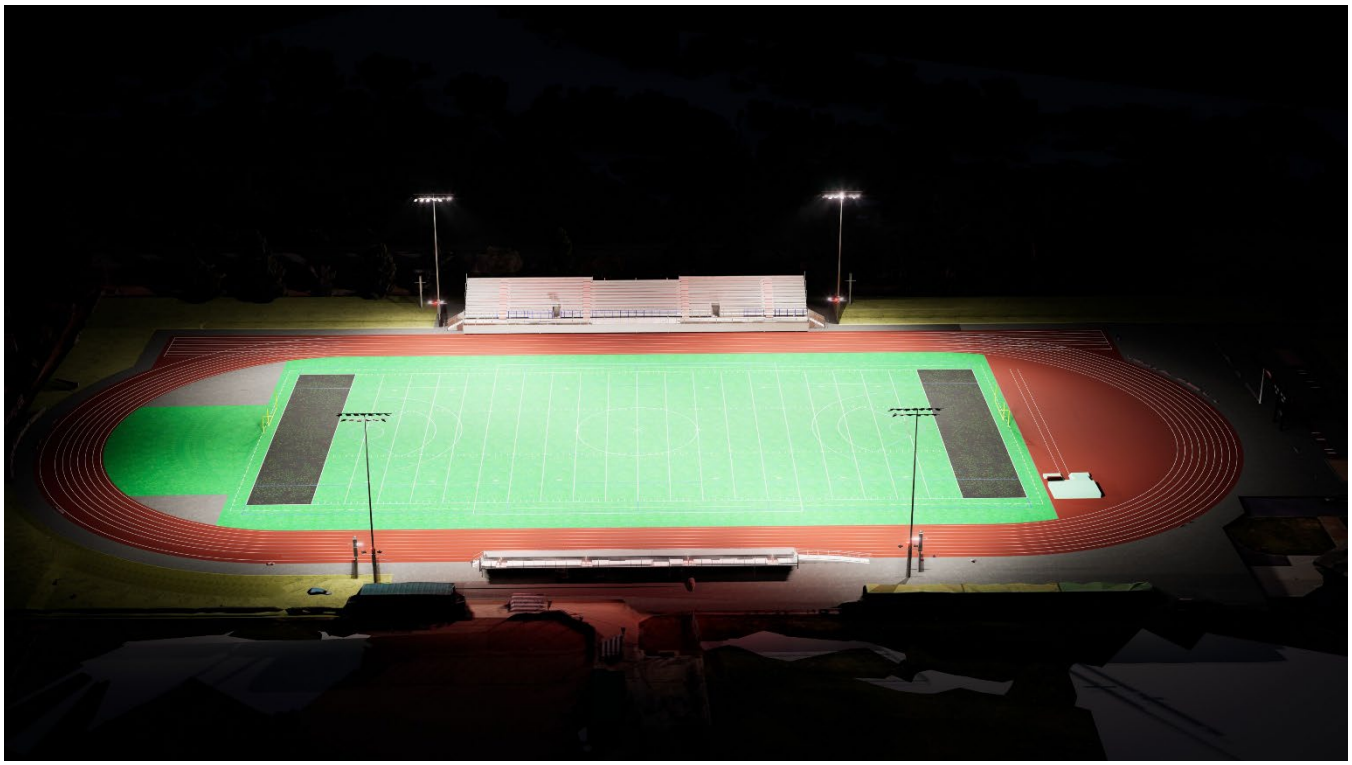
Rio Americano High School Stadium Improvements Project
Final Environmental Impact Report

SCH Number: 2026010094



November 2026

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November 2026

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1 INTRODUCTION

The San Juan Unified School District (District) prepared an environmental impact report (EIR) to evaluate the potential environmental effects of the proposed Rio Americano High School Stadium Improvements Project, also referred to as "the proposed project" in compliance with the California Environmental Quality Act (CEQA) (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations Section 15000 et seq.).

1.1 ENVIRONMETNAL REVIEW PROCESS

A Notice of Preparation (NOP) for the 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 San Juan Unified School District (District) considered comments submitted in response to the NOP during preparation of the Draft EIR.

The District prepared a Draft Environmental Impact Report (Draft EIR) (State Clearinghouse Number 2026010094) for the proposed project, and published required notices to provide responsible agencies and other interested parties with notice that the Draft EIR was available for review, and to solicit comments and concerns regarding the environmental issues associated with the proposed project. The public review period ran from September 2, 2026 to October 16, 2026.

This Final EIR (FEIR) includes copies of comments submitted, responses to the comments, and any changes to the text of the Draft EIR, as well as references and applicable attachments.

1.2 REQUIREMENTS FOR RESPONDING TO COMMENTS

In accordance with Section 15088 of the CEQA Guidelines, the District, as the lead agency, has reviewed the comments received on the Draft EIR for the proposed project and has prepared written responses to the comments received.

1.3 REQUIREMENTS FOR CERTIFICATION AND FUTURE STEPS IN PROJECT APPROVAL

The Final EIR allows the public and the District decision makers an opportunity to review revisions to the Draft EIR and the Responses to Comments. The Final EIR serves as the environmental document to inform the District Board of Education's consideration of the proposed project, either in whole or in part, or one of the alternatives to the project discussed in the Draft EIR. As required by Section 15090 of the CEQA Guidelines, a lead agency, in certifying a Final EIR, must make the following three determinations:

1. The Final EIR has been completed in compliance with CEQA.

2. The Final EIR was presented to the decision-making body of the lead agency, and the decision-making body reviewed and considered the information in the Final EIR prior to approving the project.

3. The Final EIR reflects the lead agency's independent judgment and analysis.

As required by Section 15091 of the CEQA Guidelines, no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings (Findings of Fact) for each of those significant effects, accompanied by a brief explanation of the rationale for each finding supported by substantial evidence in the record. The possible findings are:

1. Changes or alterations have been required in, or incorporated into the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.

1.4 ORGANIZATION AND FORMAT OF THE FINAL EIR

The District prepared this Final EIR, which includes:

- A full list of agencies, organizations, and individuals that provided comments on the Draft EIR;
- Responses to comments on the Draft EIR in Chapter 2, "Responses to Comments,"
- Minor revisions to the Draft EIR detailed in Chapter 3, "Errata," of this Final EIR, and
- References cited in this Final EIR are contained in Chapter 4, "References."

Chapter 2, "Responses to Comments" of this Final EIR responses to each of these comments (as required by the CEQA Guidelines Section 15132). To assist the reader, each response includes a summary of the comment. The range of responses include providing clarification on the Draft EIR, making factual corrections, explaining why certain comments may not warrant further response, or simply acknowledging the comment for consideration by decision makers when the comment does not relate to the adequacy of the EIR for addressing potential adverse physical environmental effects of the project.

In some instances, responses to comments may warrant modification of the text of the Draft EIR. In those cases, the text of the Draft EIR is revised and the changes compiled in Chapter 3, "Errata" of this Final EIR. The text deletions are shown in strikeout (strikeout) and additions are shown in underline (underline). The revisions summarized in Chapter 3 of this Final EIR do not change the conclusions presented in the Draft EIR.

All comments received on the Draft EIR are also provided as Attachment A to the Final EIR, organized by Agency, Organization, and Individual.

This document and the Draft EIR together constitute the Final EIR for consideration of certification by the District Board of Education.

2 COMMENTS ON THE DRAFT EIR

This section of the Final EIR contains responses to comments received during the public review period for the Draft EIR. In conformance with CEQA Guidelines Section 15088(a), the SJUSD has prepared written responses to comments on environmental issues received from reviewers of the Draft EIR.

2.1 COMMENTS ON THE DRAFT EIR

Table 2-1 identifies a number for each comment letter received, the author of the comment letter, and the date of the comment letter. Each comment letter is included in its entirety in Attachment A to this Final EIR for decision maker consideration. The District also received public comments after the close of the public review period that do not raise any new areas of concern outside of those identified by those comments received during the public review period and do not affect any of the EIR analysis. These comments are also identified in Table 2-1 and provided for informational purposes in Attachment A.

Table 2-1. Comments Received on the Draft EIR

Letter #	Commenter	Date
Agency		
A1	California Department of Transportation District 3, Robynn Spence, Local Development Review	September 8. 2026
A2	Sacramento County Department of Transportation, Gary Gasperi, P.E., T.E., Senior Civil Engineer	October 14, 2026
A3	Sacramento County Department of Community Development	October 16, 2026
Organizations		
O1	American River Trees, Peter Spaulding	October 15, 2026
O2	Dark Sky Sacramento, Adrienne Starkey	October 17, 2026
O3	Preserve the American River, Brenda Gustin, Ph.D., Preserve the American River Steering Committee	October 16, 2026
O4	Rio Americano Community Alliance; Jason Holder, Counsel	October 16, 2026
O5	Sacramento Area County Creek, Mark Baker, Treasurer	October 2, 2026
O6	Sacramento Bird Alliance, Cliff Feldheim, President	October 15, 2026
O7	Save the American River Association, Sara Stephens, Office Manager	October 16, 2026
O8	Sierra Club Mother Lode Chapter, Sacramento Group, Brenda Gustin, Ph.D.	October 16, 2026
O9	Waterbird Habitat Project, Andrea Willey, M.D.	October 13, 2026
Individuals		
I1	JS Adams	October 14, 2026
I2	Williams E. Avery, PhD	October 15, 2026
I3	Roger Baccigaluppi	October 13, 2026
I4	Chris Balaam	October 15, 2026
I5	Rachel Bauer	October 15, 2026
I6	Twanet Bender	October 14, 2026
I7	Sydney Brahm	October 15, 2026
I8	Bette Burrows	October 15, 2026

Letter #	Commenter	Date
I9	Patrick Carroll, MD	September 26, 2026
I10	Keith and Heidi Collins	October 16, 2026
I11	Betty Cooper	September 14, 2026
I12	Katherine Coulter	October 15, 2026
I13	Catherine Dee	September 27, 2026
I14	Del and Connie Del Real	September 13, 2026
I15	Sara Denzler	October 14, 2026
I16	Gail Derin	October 15, 2026
I17	Barbara Dugal	September 2, 2026
I18	Barbara Dugal	October 16, 2026
I19	Ms. Shawn Duncan	September 26, 2026
I20	Teeann Duncan	October 14, 2026
I21	Kimberly Erickson	October 16, 2026
I22	Scott Erickson	October 16, 2026
I23	Graham Everett	October 14, 2026
I24	Elise Fandrich	October 14, 2026
I25	Annette Faurote	September 26, 2026
I26	Alexis Firsty	October 5, 2026
I27	Marni Fylling-Ellison	September 30, 2026
I28	Erik Gabele	October 16, 2026
I29	Julie Gabele 1	October 6, 2026
I30	Julie Gabele 2	October 15, 2026
I31	Julie Gabele 3	October 16, 2026
I32	Barbara Gardner	October 14, 2026
I33	Margaret Goerig	October 16, 2026
I34	Rowena Gray	October 11, 2026
I35	Konstantin Grigoryan	October 14, 2026
I36	Liyan and Greg Grimm	October 14, 2026
I37	William Grissom	September 2, 2026
I38	William Grissom	September 8, 2026
I39	Cary Hart	October 17, 2026
I40	Phyllis Hayes	October 14, 2026
I41	Candice Heinz	October 15, 2026
I42	Reinhard Hohlwein	October 16, 2026
I43	Evan Hood	September 9, 2026
I44	Michael Hooper	September 8, 2026
I45	Gay Jones	October 14, 2026
I46	Paul Jorjorian	September 26, 2026
I47	Bruce Kamilos	October 2, 2026
I48	Janice Kelley	October 15, 2026

Letter #	Commenter	Date
I49	John Kilted	October 14, 2026
I50	Nancy Kniskern	October 16, 2026
I51	Laura Langham	October 14, 2026
I52	Linda Larson	October 14, 2026
I53	Cathie LaZier	October 14. 2026
I54	Gregory Leafe	September 29, 2026
I55	Michael Leaon	October 16, 2026
I56	Marya Liberty	October 16, 2026
I57	Erica Lynn-Croy	October 15, 2026
I58	Nancy and Stewart MacKenzie	October 14, 2026
I59	Dennis Mangers	September 8, 2026
I60	Lorraine Markoff	October 15, 2026
I61	Rachel Markoff	October 15, 2026
I62	Barbara McKnight	October 14, 2026
I63	Lisa Merritt M.D.	October 14, 2026
I64	Laura Mills	October 15, 2026
I65	Ilah Rose Minton	September 26, 2026
I66	Janice Modin	October 14, 2026
I67	Wendy Money	October 14, 2026
I68	Leslie Morelli	September 26, 2026
I69	Loretta Moreno	October 13, 2026
I70	Maureen Morris	September 2, 2026
I71	Polly Muprhy-Jones	October 14, 2026
I72	Maren Nasseri	October 16, 2026
I73	Geraldine Nicholson	October 15, 2026
I74	Joy Nishida	October 12, 2026
I75	Joe O'Connor	October 14, 2026
I76	Karen Olson	September 28, 2026
I77	Suzanna Park	September 11, 2026
I78	Pasterski	October 14, 2026
I79	William Pevec	October 13, 2026
I80	Dara Pfeiffer	September 26, 2026
I81	Lisa Phenix	September 22, 2026
I82	Lisa Phenix	October 15, 2026
I83	Patricia Prendergfast	September 27, 2026
I84	Judy Press	October 15, 2026
I85	Marybeth Primeau	October 14, 2026
I86	Cathryn Rakich	October 4, 2026
I87	Francesca Reitano	October 15, 2026
I88	Alan Rhodes	October 16, 2026

Letter #	Commenter	Date
I89	Barbara Selewicz	September 26, 2026
I90	Barbara Selewicz	October 15, 2026
I91	Joe Selewicz	October 15, 2026
I92	Joe and Barbara Selewicz 2	October 15, 2026
I93	Selge	September 27, 2026
I94	Frank Severson	October 2, 2026
I95	Cheryl Slama	October 3, 2026
I96	Paul Spaulding	October 16, 2026
I97	Mary Starkey	October 14, 2026
I98	Sara Stephens	October 15, 2026
I99	Dr. Michelle Stevens	October 16, 2026
I100	Don Stewart	October 14, 2026
I101	Sarah Strand	October 14, 2026
I102	Dale Vaira 1	October 13, 2026
I103	Dale Vaira 2	October 14, 2026
I104	Dale Vaira	October 15, 2026
I105	Darlene Vaira 1	October 15, 2026
I106	Darlene Vaira 2	October 15, 2026
I107	Darlene Vaira 3	October 15, 2026
I108	Darlene Vaira 4	October 15, 2026
I109	Philip Vercruyssen	October 15, 2026
I110	Ginny Volk-Anderson	October 15, 2026
I111	Betsy Weiland	October 15, 2026
I112	Tony Whetstone	October 14, 2026
I113	No Comment – Misnumbering of Comments	Not Applicable
I114	Mary Wilson	October 15, 2026
I115	Donald Young	October 16, 2026
I116	Kella Cohen	October 16, 2026*
	Comments Received After the Close of the Public Review Period	
Late01	Fritz Harsch	October 20, 2026
Late02	William Pevec	November 1, 2026

*

2.2 RESPONSE TO COMMENTS

This section of the Final EIR contains responses to comments in the comment letters received during the public review period for the Draft EIR. Consistent with CEQA Guidelines Section 15088(a), written responses to comments on environmental issues received from reviewers of the Draft EIR were prepared, with a focus is on comments pertaining to the adequacy of the EIR for addressing potential adverse physical environmental impacts associated with implementation of the proposed project.

2.2.1 MASTER RESPONSES

This section presents "master responses" addressing a number of similar or recurring topics in the comments received on the Draft EIR. The intent of the master responses is to avoid repetition within this document and improve readability by giving a single, comprehensive response to these comments. Individual responses to comments provide cross references to these master responses.

MASTER RESPONSE 1: CONSISTENCY WITH APPLICABLE ZONING AND OTHER REGULATIONS GOVERNING LAND USE

Several commenters stated that the Draft EIR must specifically analyze the Project's consistency with certain land use plans and zoning regulations. This Master Response addresses the following key topics related to the Project's consistency with applicable land use plans, zoning regulations, and other relevant statutory schemes:

- The Federal and State Wild and Scenic Rivers Act (16 U.S.C. § 1271, et seq.; Pub. Resources Code, § 5093.50, et seq.)

- The Urban American River Parkway Preservation Act (UARPPA) (Pub. Resources Code, § 5840 et seq.), including the American River Parkway Plan (ARRP) and the American River Parkway Natural Resources Management Plan (NRMP)

- The Sacramento County General Plan, including the Arden-Arcade Community Plan (AACP), the Sacramento Countywide Design Guidelines, the Sacramento County Zoning Code (SZC), and the Sacramento County Noise Ordinance

The Draft EIR summarizes the Project's planning context in Section 3.1 of the Project Description (pages 3-1 to 3-4) and analyzes the Project's consistency with applicable land use plans and zoning regulations in Section 5.9 (pages 5.9-29 to 5.9-30). The Draft EIR also analyzes the Project's consistency with resource-specific land use and zoning policies, including those related to Aesthetics in Section 4.1 (pages 4.1-11 to 4.1-26), Biological Resources in Section 4.2 (pages 4.2-12 to 4.2-27), and Noise in Section 4.3 (pages 4.3-12 to 4.3-27). With the exception of the Sacramento County Noise Control Ordinance, the Draft EIR concludes that the Project, as designed, will not conflict with any land use policy or zoning regulation that governs these resources in a manner that would lead to any significant adverse physical environmental impact.

CEQA provides that "there is no requirement that an EIR itself be consistent with [a] relevant [land use] plan[,]" instead, it must only "identify and discuss any *in*consistencies between a proposed project and the governing [land use plan. Because EIRs are required only to evaluate any *inconsistencies* with plans, no analysis should be required if the project is *consistent* with the relevant plans." (*City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 918–919, original italics.) The Draft EIR relies on this framework to analyze and ultimately conclude the Project will not significantly conflict, obstruct, or be inconsistent with any applicable land use plans that directly govern the Project Site. (CEQA Guidelines, § 15125, subds. (d)–(e).)

More specifically, and as to the Project's consistency with applicable land use plans and zoning regulations, the Draft EIR explains that the Project would improve Rio Americano High School's (RAHS) existing Raider Stadium by installing lighting, an upgraded public address system, additional bleacher seating, and a press box. These improvements will occur and be conducted within RAHS's existing campus footprint and will not introduce new physical features, such as roadways, fencing, or barriers. Instead, the surrounding residential neighborhoods and campus would remain connected by existing pedestrian routes and roadways (i.e., American River Drive and Fair Oaks Boulevard). (Draft EIR, p. 5.9-29.) The Draft EIR also explains how the Project complies with the site's underlying zoning designation and corresponding regulations that govern development along the American River Parkway. (Draft EIR, p. 5.9-30.) Specifically, the Project will not require a general plan amendment, a land use or zoning change, or expansion of the campus boundary. Because the high school's existing land use would remain unchanged and the Project's proposed improvements would occur entirely within the established developed campus footprint, the Project will not conflict with any applicable land use plan, policy, or regulation, including those adopted to avoid or mitigate environmental impacts. As such, implementing the Project will not generate any adverse physical environmental impacts by virtue of a conflict with a land use plan or policy. (Draft EIR, p. 5.9-30.)

School District Exemption from Local Zoning Ordinances

Several commenters raised questions about the Project's exemption from local zoning regulations. As a general rule, Government Code, section 53091, typically requires local agencies to comply with local zoning ordinances. However, Government Code, section 53094, exempts school districts from complying with the zoning ordinances of a city or county unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan. (Gov. Code, § 53094, subd. (a).) Alternatively, a school board may, by two-thirds majority vote, to "render a city or county zoning ordinance inapplicable to a proposed use of property by the school district[,]" so long as it is for facilities used directly for or related to educational purposes (i.e., non-"nonclassroom" facilities). (Gov. Code, § 53094, subd. (b); see *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1061–1063.)

The rationale behind Section 53094 is that, since most school district construction projects are subject to review and approval by the Division of the State Architect (DSA) and other State agencies, compliance with local ordinances would be redundant and, in some cases, could result in conflicting obligations for the school district. As a result, jurisdiction of school facility design and construction is seated with State agencies, such as the California Office of Public School Construction and the DSA. (Edu. Code, § 17280, et. seq.) Just as it will do with the Project here, the DSA reviews, approves, and oversees constructions of educational facilities and their requisite plans and specifications. By limiting the number of potentially overlapping zoning regulations that would govern a nonclassroom facility project, Section 53094 provides certainty to school boards, such as the District, who otherwise might be forced to expend significant time and resources trying to comply with unreasonable, inapplicable, or conflicting land use requirements, which would in turn delay construction of needed educational facilities.

San Juan Unified School District (SJUSD or the District) operates Rio Americano High School (RAHS) as a public school within the County of Sacramento. (Draft EIR, p. 4.1-18.) Because RAHS is a California public school, the District may rely on the exemption provided by Government Code, section 53094. Pursuant to subdivision (a), the District is generally exempt from local zoning regulations because neither the County Code nor General Plan explicitly provide for the location of public schools. (Gov. Code, § 53094, subd. (a).) The District may also vote to exempt its school facilities from complying with County zoning standards and regulations, pursuant to subdivision (b). The Project qualifies as an exempt school facility because it will be used for physical education classes, interscholastic athletics, matriculation and graduation events, and other on-campus spirit activities. (Draft EIR, p. 3-10.) These activities and opportunities are integral to the RAHS's programming and are a vital part of the free education that is constitutionally guaranteed to local citizens. (See *City of Santa Cruz v. Santa Cruz City School Bd. of Education* (1989) 210 Cal.App.3d 1, 4–9 [new stadium, sports field, and lights were exempt from local zoning because they served an important educational purpose that would be directly used for student instruction].) Therefore, even though the Project will not conflict with the Site's underlying land use and and zoning designations (as explained more fully below), the District can and may resolve to rely on Section 53094 to exempt the Project from the County's zoning requirements if and when it decides to certify the EIR and approve the Project. (Gov. Code, § 53094, subd. (c); see *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 919 [explanation that proposed school would not conflict with general plan, coupled with school district's exercise of zoning exemption, supported EIR's finding that no land use inconsistencies existed, therefore no further analysis in EIR was required].)

Several commenters also asked how the school district zoning exemption under Section 53094 extends to other local, state, and federal statutes and regulations that govern the nearby American River Parkway. As detailed below, this Master Response summarizes the primary pieces of legislation raised by commenters and explains how they fall within the purview of Section 53094's zoning exemption. Broadly speaking, and to provide a brief overview: the Sacramento County Zoning Code zones the Project Site as Low-Density Single-Family Residential (RD-4) within the Parkway Corridor Combining Zone (PCZ). The County adopted the PCZ zoning designation to implement the goals and policies of the American River Parkway Plan (ARPP) and its accompanying Natural Resources Management Plan (NRMP). The ARPP is the County's local land use plan that is codified by the State Legislature via the Urban American River Parkway Preservation Act (UARPPA). The ARPP also acts as the management plan for the Federal and California Wild and Scenic Rivers Acts (WSRA). Each of these statutory schemes and land use plans provide the framework and recommended goals for managing the Parkway's resources. They are thus inherently flexible in nature and rely on local implementation through more finite, area-specific restrictions, such as zoning codes. Thus, when taken together and applied here, because the PCZ's more specific zoning restrictions and development requirements serve to implement the goals and directives of these broader statutory schemes and land use plans, any zoning exemption from the PCZ—such as that provided to the District under Section 53094—necessarily results in an exemption from the statutes and plans that the PCZ zoning designation implements. So, although the Draft EIR explains how the Project would not conflict with or obstruct the goals, policies, and limitations of the PCZ or any of the aforementioned statutory schemes it implements, the Project is nevertheless exempt from them pursuant to Section 53094.

The Federal and California Wild and Scenic Rivers Acts

The Federal Wild and Scenic Rivers Act (Federal WRSA) sets forth policies that govern certain selected rivers identified as possessing outstanding and remarkable values. (16 U.S.C. § 1271, et seq.) The Act seeks to preserve all or portions of designated rivers to preserve water quality and natural, recreational, scenic, cultural, biological, and historic values. The Lower American River is designated under the Federal WSRA; therefore, the National Parks Service is responsible for determining whether federal activities or other projects over which it has jurisdiction within those areas of the River are consistent with the Act. (See ARPP, p. 90.) The Federal WSRA explicitly prohibits federal agencies from approving, constructing, or licensing certain projects within the Lower American River. (*Id.*, p. 91.) Here, the District is not a federal agency, therefore these prohibitions do not apply to the Project. As to other local jurisdictions, the Act provides management guidance and direction for purposes of ensuring consistency with the Lower American River's "recreational" designation. (*Id.*, pp. 91–92.) As relevant here, this designation means that the Lower American River is one that is "readily accessible by road or railroad, that may have some development along [its] shorelines, and that may have undergone some impoundment or diversion in the past." (*Id.*, p. 92.) The Draft EIR concludes that the Project, which will be developed on an preexisting and already disturbed site, will not have significant project-level or cumulative impacts to recreational uses. (See Draft EIR, pp. 5.13 to 5.13-34.)

The California Wild and Scenic Rivers Act (California WSRA) is the State's corollary to its federal predecessor. (Pub. Resources Code, § 5093.50, et seq.) The California WSRA requires the Natural Resources Agency to coordinate the activities of state agencies that may affect rivers within the system with those activities of other state, local, and federal agencies with jurisdiction over matters which may affect the rivers. (Pub. Resources Code, § 5093.60.) But the Act also clarifies that "[a]ll local government agencies shall exercise their powers granted under any other provision of law in a manner consistent with the policy and provisions of [the Act]." (Pub. Resources Code, § 5093.61.) In light of this, the Act reiterates that it "neither diminishes the power of the secretary or any other state or local official or agency under any other statute, nor conveys any authority, express or implied, to the secretary or any state or local agency, commission, board, or official to adopt or implement any interim or permanent order, rule, regulation, guideline, or directive concerning land use regulation." (Pub. Resources Code, § 5093.58.) This section thus expressly recognizes and does not diminish or usurp the District's authority under Government Code, section 53094 to exempt itself from zoning ordinances and land use regulations. In other words, the more specific authority granted to the District by Government Code, section 53094, controls in light of the express nonlimiting language articulated in Section 5093.58 of the California WSRA. (Code of Civ. Proc., § 1859 [specific statutes control general ones].)

The Urban American River Parkway Preservation Act (UARPPA)

The California Legislature adopted the Urban American River Parkway Preservation Act (UARPPA) (Pub. Resources Code, § 5840, et seq.) in 1984 to coordinate protection and management of the American River Parkway. (Pub. Resources Code, § 5842, subd. (a).) The County of Sacramento implements the Act through the American River Parkway Plan (ARPP). The ARPP also serves as a management plan for agencies responsible for implementing any applicable policies from the Federal and California WSRAs.

Public Resources Code, section 5842, subdivision (b), provides that "[a]ctions of state and local agencies with regard to land use decisions shall be consistent with the American River Parkway Plan, subject to [enumerated] provisions[.]" (Pub. Resources Code, § 5842, subd. (b).) Section 5842, subdivision (a), also explains that the Legislature enacted the UARPPA as a means of promulgating and adopting the ARPP, which "provide[s] coordination with local agencies in the protection and management of the diverse and valuable natural land, water, native wildlife, and vegetation of the American River Parkway." (Pub. Resources Code, § 5842, subd. (a).)

Neither Section 5842 nor the rest of the UARPPA contain any preemptive language that would indicate the Act supersedes the District's exemption authority under Government Code, section 53094. Nor do the UARPPA's provisions impose binding legal obligations on the District or its decision-making authority under CEQA. Nevertheless, and as explained more fully below, the Project would not conflict with the American River Parkway Plan (ARPP), which implements the UARPPA. (Draft EIR, p. 5.9-30.)

The American River Parkway Plan (ARPP)

Several commenters asserted that the Draft EIR did not adequately discuss the Project's consistency with policies of the American River Parkway Plan (ARPP). As explained above, the County of Sacramento implements the UARPPA via the ARPP as an element of its General Plan. The ARPP also serves as the County's Federal and State Wild and Scenic River management plan under the Federal and California Wild and Scenic River Acts. (16 U.S.C. § 1271, et seq. [Federal WSRA]; Pub. Resources Code, § 5093.50, et seq. [State WSRA].)

As with the UARPPA, the ARPP likewise does not restrict the District's land use decision-making authority. Instead, the Plan states that it functions as an "informational" "policy and action document" that helps agencies "guide land use decisions affecting the Parkway." (ARPP, p. 9.) In turn, the Plan's policy statements are "of a general and flexible nature" to help "provide basic policy guidance for the future of the Parkway." (ARPP, p. 9; see ARPP at p. 15 ["This Plan is a policy document which provides guidelines for preservation, recreational use, development, and administration of the American River Parkway"].) Given the Plan's stated flexibility, the District retains significant discretion when analyzing the Project's consistency with the Plan's applicable provisions. (See *Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 822–826 [agencies retain significant discretion and leeway in analyzing a project's consistency with land use plans]; *San Francisco Tomorrow v. City and County of San Francisco* (2014) 229 Cal.App.4th 498, 517–520 [it is the province of elected officials to weigh and balance the policies of a land use plan to determine whether a project would be in harmony with the policies stated therein].) The ARPP likewise corroborates this. Sections 7.5 and 7.24, for instance, vest local jurisdictions with the responsibility for regulating development of privately owned land and parcels on or adjacent to the Parkway. Therefore, for those parcels under the jurisdiction over another agency—such as the District—the Plan provides only policy guidance on how to regulate use of their land.

Several commenters reference ARPP Policies 7.19, 7.19.1, 7.19.2, 7.23, and 7.24 regarding the design and location of adjacent development to protect the Parkway's aesthetic and natural resources.

Policy 7.19 provides 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." (ARPP, p. 30.) For each applicable resource to which this policy applies, the Draft EIR analyzes the Project's potential impact thereto and, to the extent necessary, imposes mitigation to ensure impacts remain less than significant. (See, e.g., Draft EIR, pp. 4.1-14 to 4.1-18 [aesthetics], pp. 4.12-12 to 4.2-14 and 4.2-26 to 4.2-27 [biological resources].) As the Draft EIR explains, the Project will not have significant and unmitigated impacts to aesthetics or biological resources, and therefore, will not conflict with Policy 7.19.

Policy 7.19.1 provides that "[s]tructures shall be located so that neither they nor activities associated with them, cause damage to Parkway plants or wildlife." (ARPP, p. 30.) Similarly, Policy 7.19.2 provides that "[s]tructures 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 [the] Plan." (ARPP, p. 31.) The Draft EIR explains how the Project does not conflict with either of these policies. (See, e.g., Draft EIR, pp. 4.2-13, 4.2-26 to 4.2-27.) The Draft EIR notes that the Project will be developed within existing athletic facilities on the fully-developed RAHS campus, which, by extension, does not contain any special-status species or wildlife corridors. Moreover, the Project's activities, including its proposed lights, will not have significant impacts to any special-status species or Parkway plants and wildlife because the Project has been designed to ensure it is consistent with rigorous lighting standards that avoid light spillage, glare, and skyglow. Finally, and as explained above, the Project will not modify existing pedestrian pathways or roadways, nor will it construct structures that impede existing Parkway pathways, and thus will not impede the recreational use of the Parkway.

Policies 7.23 and 7.24 state that local jurisdictions shall regulate adjacent development visible from the Parkway and may consider tools such as vegetative screening, setbacks and buffers, and avoid intrusive lighting. (ARPP, pp. 31–32.) These kinds of aesthetic concerns are also thoroughly analyzed in the Draft EIR, which includes technical studies and visual simulations demonstrating there will be no light spillover onto the Parkway and that the light poles will be visible from the Parkway, but not prominently so. (See Draft EIR, pp. 4.1-14 to 4.1-26, 6-6; see also Draft EIR, Appx. B [Lighting Study].) The analysis also notes that users are prohibited in the Parkway after dusk, so no one should be able to view the light poles from the Parkway when they are lit for night games. (Draft EIR, pp. 5.13-33 to 5.13-34, 6-6.)

The American River Parkway Natural Resources Management Plan (NRMP)

Several commenters also reference the Project's consistency with the American River Parkway Natural Resources Management Plan (NRMP), which is a part of and supplement to the ARPP. (Available online at: https://regionalparks.saccounty.gov/content/dam/regionalparks/docs/archive/ARP-NRMPFinal-2023-01-26.pdf.) The NRMP was adopted by the County in 2023 as a guidance document for the Sacramento County Regional Parks to use in managing the American River Parkway's natural resources and environmental quality. A key aspect of the NRMP is to integrate key resource areas found within the Parkway, including biological resources, physical resources, cultural resources, and human uses. The Plan, therefore, provides recommendations along with policies for Regional Parks to consider so that it can manage natural resources in concert with multi-agency communication and coordination.

Like the ARPP, the NRMP is similarly flexible in nature and does not impose any binding land use restrictions on parcels on or adjacent to the Parkway. The NRMP explains that … The NRMP also describes the SARA Park Area, which borders the Project Site. (NRMP, pp. 8-68 to 8-73.) The Plan explains that "[a]ll of SARA Park is either intentionally or unintentionally altered by [previous] actions[,]" such as early hydraulic mining and more recent flood control projects to protect public safety. (*Id.*, p. 8-68.) Given this, the Plan identifies expected future trends around the area and "desired conditions," such as limiting future bank and levee protection projects to those required for public safety and protection of property outside the Parkway. (*Id.*, p. 8-70.) The Plan explains, though, that these desired conditions and any accompanying policies are designed to assist Regional Parks before it undertakes certain activities within the Parkway or when it reviews Parkway projects for which it serves as the lead agency. (*Id.*, p. 8-139.) The NRMP thus clarifies that "[i]t is important to note some projects would undergo a separate environmental review and Regional Parks would not be the lead agency on all projects." (*Id.*, p. 8-142.) As such, those projects—such as the proposed Project here—may, to the extent applicable or necessary, use NRMP "criteria to self-evaluate their projects[,]" but are otherwise not restricted by or statutorily obligated to implement and strictly adhere to its goals, measures, and policies. (*Id.*, p. 8-139; see *id.* at p. 1-12 [explaining that the Plan provides "recommendations," "goals," and "objectives," to sustainably manage the Parkway, but conceding that "it is important to consider the practical limitation on what can be implemented…"].)

As with the ARPP described above, the NRMP governs lands and activities within the Parkway and is largely implemented by the County Regional Parks Department. By virtue of being a part of the ARPP, the NRMP is likewise implemented via the PCZ, from which the Project is exempt. Nevertheless, the Project likewise does not implicate the NRMP's policies. Although the Project Site is next to the Parkway, it is not within the jurisdiction of the Regional Parks Department. The District, instead, is the local agency charged with self-evaluating its projects, to the extent the NRMP's policies apply. Here, the Project Site falls outside of the NRMP's resource management areas. Instead, the jurisdictional area closest to the Project Site is recognized as used for existing recreational uses (the Project Site is separated from the Parkway by the federal levee system). (See NRMP, p. 8-73, Fig. 8-33.) For the reasons reiterated above, the Draft EIR explains how and why the Project would not obstruct or conflict with applicable policies that apply to Parkway recreation and biological resources. Therefore, even though the Project will not inherently conflict with the NRMP's policies (to the extent they apply), they likewise do not directly govern the District's activities on the RAHS site.

Local Land Use and Zoning Regulations

The Sacramento County General Plan designates the Project Site for Low-Density Residential (LDR) land uses. The Arden-Arcade Community Plan (AACP), which is part of the General Plan, designates the Site for Low-Density Residential and Public/Quasi-Public land uses (RD-4/PQP). (Draft EIR, pp. 3-4, 5.9-29 to 5.9.30.) The PQP land use designation establishes areas for uses such as education, solid and liquid waste disposal, and cemeteries. As such, the operative zoning designation for RAHS and any improvements on its parcel must conform with the permitted uses accompanying the PQP designation, which includes educational facilities. Because the Project proposes to improve RAHS's stadium facilities within the existing on-campus footprint and will be used to support educational activities, the Project

constitutes an "educational facility," and is therefore a "permitted use" consistent with the Site's underlying PQP designation. The Project, therefore, will not conflict with either the County's General Plan or the AACP. (Draft EIR, pp. 4.1-13, 5.9-29.)

The Sacramento County Zoning Code (SZC) zones the Project Site and surrounding area as Low-Density Single-Family Residential (RD-4) within the Parkway Corridor Combining Zone (PCZ) overlay (together, RD-4/PC). (Draft EIR, pp. 3-4, 4.1-13, 4.1-18, 5.9-29.) The SZC permits public K-12 schools as "primary uses" in RD-4 zones. The SZC allows outdoor nighttime lights at schools with a CUP. (Draft EIR, p. 4.1-18.) As to the PCZ overlay, the SCZ explains that it "applie[s] to property in areas on which uses may affect the aesthetics of the American River Parkway. This combining zoning district has been established to limit uses that visually impact the parkway." (SCZ, Table 2.1; see Draft EIR, p. 5.9-30.) The PCZ therefore enforces targeted restrictions on parcels bordering the river corridor and regulates unincorporated properties for consistency with the ARPP and General Plan to protect the Parkway's aesthetic and environmental qualities from effects produced by neighboring developments. (SCZ, § 4.7.3; Draft EIR, p. 5.9-30.) But the PCZ also "[p]rovide[s] flexibility in development requirements…applicable to parcels of property subject to the regulations of the PC zoning district" to "[e]nsure, to the extent possible, the compatibility of land uses within the American River Parkway and land adjacent to the Parkway for their mutual benefit." (SCZ, § 4.7.1; see Draft EIR, p. 5.9-30.) Thus, because the Project's proposed stadium improvements will be for an educational purpose on an existing campus (which is a primary permitted use), the PCZ's stated flexible standards do not expressly prohibit construction of proposed educational facilities, including those proposed by the Project. (Draft EIR, p. 5.9-30.)

Based on this framework, although the Project is exempt from these requirements, the Project nevertheless would not conflict with the Site's LDR or RD-4/PQP land use designations because, as a school facility, it is permitted as a "primary use." Nor would the Project conflict with the Site's RD-4/PCZ zoning designation because the proposed stadium improvements would be developed entirely within the school's existing campus footprint, operated on government-owned (i.e., District) land, and would be consistent with the school's educational purpose and programming. Notably, Sacramento County did not comment on, let alone contradict, the Draft EIR's determination of consistency with the SCZ and PCZ.

The Sacramento County Noise Ordinance

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 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, as detailed on Draft EIR pages 4.3-15 and 4.3-16. 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, even though the District is

exempt from County noise standards by virtue of the County's Noise Ordinance operating as a zoning regulation for the reasons discussed above (under "School District Exemption from Local Zoning Ordinances").

Conclusion

For the foregoing reasons, the District may rely on its authority under Government Code, section 53094, to render any zoning ordinances and land use regulations inapplicable to the proposed Project. Because the Project Sute is zoned PCZ, which implements the ARPP, NRMP, UARPPA, and Federal and California WRSAs, any exemption from the PCZ zoning designation necessarily includes an exemption from the land use regulations and plans that the ordinance implements. This exemption is expressly allowed by the above statutes, which qualify that they do not restrict local land use authority. Moreover, the inherent flexible nature of the above mentioned plan policies necessarily means that strict conformance is required. Instead, the District enjoys discretion to interpret how the Project is consistent with any applicable land use policies and whether it will result in significant unmitigated impact to identified resources. As the Draft EIR details, no such impacts will occur. Therefore, because CEQA requires only that the EIR discuss inconsistencies that could result in significant impacts—rather than analyze how the Project is consistent—the Draft EIR is sufficient detailed to support informed decisionmaking.

MASTER RESPONSE 2: NIGHTTIME LIGHT AND GLARE IMPACTS AND NOISE IMPACTS ON WILDLIFE

A number of comments suggested that the Draft EIR should include additional analysis of potential impacts of operational lighting and noise on wildlife. Several comments also suggested that a variety of mitigation measures should be imposed to reduce the potential light and glare impacts. This Master Response addresses the following key topics related to nighttime lighting and glare impacts and noise impacts on wildlife (note that lighting and noise impacts on human receptors [i.e., surrounding neighbors] are addressed under Master Responses 3 and individual comment responses throughout this Final EIR Chapter, as applicable):

The Draft EIR analysis of potential impacts of operational lighting and noise on wildlife (Impact 4.2-1, pages 4.2-17 through 4.2-21, and Impact 4.2-4, pages 4.2-24 and 4.2-25) used conservative techniques and considered a variety of factors, including modeled/estimated conditions under the proposed project; existing conditions; the frequency, duration, and timing of new stadium events; and the nature of potential impacts.

The Draft EIR analysis focused on riparian habitat in the American River Parkway south of the school campus, which provides suitable habitat for special-status species (see Table 4.2-1, pages 4.2-4 through 4.2-7), nesting birds (page 4.2-9), and roosting bats (Appendix C), and a migratory corridor for native wildlife. As described in the Draft EIR (pages 4.2-1 through 4.2-2), the school campus and adjacent levee do not provide suitable habitat for special-status species or high-quality habitat for sensitive life stages (e.g., breeding) of native species; this assessment does not omit the possibility of occasional use of these areas by wildlife. Because the nearest riparian habitat is approximately 100 feet from the proposed project

site, the Draft EIR analysis references some measurements at this location, not to indicate that impacts may not occur at farther distances but to evaluate the highest magnitude of impacts that may occur within riparian habitat due to the attenuation of noise and light impacts with distance from the source. The analysis of operational impacts of the proposed project in the Draft EIR also considered birds that may pass over Raider Stadium during migration.

Operational Noise

Reference noise measurements from a football game at nearby El Camino High School were used to estimate operational noise levels during new stadium events under the proposed project at the nearest riparian habitat (59 to 72 dBA L_{eq}, 73 to 87 dBA L_{max}; page 4.2-20). The Draft EIR evaluation of noise impacts to wildlife (page 4.2-20) also references short-term ambient (55 dBA L_{eq}) and maximum (84 dBA L_{max}) noise measurements collected south of the project site; the maximum value was also conservatively attenuated 100 feet to riparian habitat (78 dBA L_{max}), even though any noise in the Parkway would also influence actual ambient noise levels at this location and trees along the southern boundary of the school would buffer noise. Although these numbers only reflect one short-term daytime measurement, additional references to noise measurements in multiple locations in the vicinity of the project under a variety of conditions, including nighttime measurements, measurements across the American River from the project site, and long-term measurements, are available in Existing Noise Environment (pages 4.3-2 through 4.3-8 of the Draft EIR) to further characterize the range of conditions in existing noise environment. Wildlife in riparian habitat in the Parkway are already exposed to some level of anthropogenic disturbance from existing stadium events (page 4.2-21, page 4.3-3) and recreational use. All measurements support the Draft EIR analysis of noise impacts on wildlife, which describes an increase in ambient noise levels during new stadium events and maximum noise levels within the range of maximum noise levels under existing conditions.

A-weighted decibels were used for noise measurements and estimates in the Draft EIR (page 4.3-1, page 4.2-20). Although A-weighting of sound weights frequencies based on human sensitivity to noise, A-weighted decibels are regularly used to evaluate noise impacts on wildlife (Shannon et al. 2016, Caltrans 2016) and provide an appropriate level of detail to evaluate potential impacts of the proposed project on wildlife under CEQA. Wildlife sensitivity to frequencies of the sound spectrum can differ from human sensitivity and vary between taxa but often overlap the hearing frequency range of humans; for example, birds typically hear best between 1 kilohertz and 5 kilohertz (Dooling et al. 2019). Because anthropogenic noise (e.g., stadium crowd noise) is predominantly low frequency, A-weighting of noise measurements often overestimates noise effects on wildlife, like birds and bats, with lower sensitives to noise at low frequencies (Caltrans 2016). Most available studies of noise impacts on wildlife lack spectral analysis (Shannon et al. 2016).

Little species- or taxa-specific data are available regarding exposure conditions that induce hearing loss in wildlife, particularly for aquatic reptiles like northwestern pond turtle (Mooney et al. 2026); most available data assess birds and marine mammals (Shannon et al. 2016, Mooney et al. 2026). As such, it is not possible or feasible for the EIR analysis of noise impacts to evaluate wildlife individually by species. Available data for birds indicate birds are more resistant to hearing loss and auditory damage than humans

(Saunders and Dooling 2018, as cited in Dooling et al. 2019). As indicated in the Draft EIR (pages 4.2-20 through 4.2-21), "the risk of increased noise [from the proposed project] resulting in short-term or permanent hearing loss for local wildlife is also limited." Exposure to extreme noises (i.e., over 100 dB) over long durations (i.e., 72 hours) would be necessary for hearing loss or permanent auditory damage in birds (Dooling et al. 2019); continuous noise levels between approximately 93 dBA and 110 dBA may result in temporary threshold shifts (i.e., temporary hearing loss) lasting from seconds to days (Caltrans 2016). The noise levels and durations that result in temporary or permanent hearing loss in birds are greater than those to which wildlife would be exposed under the proposed project. The conservatively estimated noise levels within the Parkway during new stadium events (59 to 72 dBA L_{eq}, 73 to 87 dBA L_{max}; page 4.2-20) would be within the range of noise levels with the potential to result in increased stress, disruption of behavioral patterns, and masking of environmental cues for wildlife, as stated on page 4.2-21 of the Draft EIR (Caltrans 2016, Shannon et al. 2016, Dooling et al. 2019). Wildlife species can use short-term behavioral responses (e.g., increased vocalization volumes, changing location [see page 4.2-21 of the Draft EIR], head turning, vocalizing during pauses in noise) to adapt to temporary increases in noise (Caltrans 2016, Dooling et al. 2019). Therefore, the variety of noise metrics, habitats, wildlife species, and exposure levels (i.e., noise level, duration, and frequency) in available studies do not directly correlate to the proposed project, but available data do indicate estimated project noise levels would not result in long-term, significant impacts to individual wildlife in riparian habitat in the Parkway.

Increased operational noise levels from the proposed project would be localized and would not affect riparian habitat throughout the 32-mile-long Parkway. Furthermore, increased noise levels would not reach typical altitudes of migrating birds (2,600 feet; see page 4.2-19 of the Draft EIR) and would not influence stopover site selection. Therefore, increased operational noise levels under the proposed project would not result in population-level effects on native wildlife.

As stated in the Draft EIR evaluation of operational noise impacts on wildlife (page 4.2-21), new stadium events under the proposed project would be infrequent, of short duration, and largely in the fall outside the nesting bird season, northwestern pond turtle nesting season, bat maternity season, and valley elderberry longhorn beetle flight season. Increased noise levels would not result in any permanent degradation of riparian habitat, including the migratory corridor along the American River. Operational noise impacts would not result in continuous or frequent masking of vocal cues or stress throughout sensitive life stages of protected and special-status species. Furthermore, Mitigation Measure 4.3-1b, identified in Section 4.3, includes measures to reduce operational noise levels.

Operational noise from the proposed project would be temporary, infrequent, and would not reach levels or distances that would result in long-term or population-level impacts on native wildlife and their habitat. Therefore, operational noise impacts on wildlife species would be less than significant, as indicated under Impacts 4.2-1 (page 4.2-21) and 4.2-4 (page 4.2-24) in the Draft EIR.

Operational Lighting

The existing lighting conditions at the project site include the use of eight portable diesel-powered light-emitting diode (LED) light towers used during some evening hours, in winter months when sunset occurs

earlier in the day. The current lighting regime is not designed with directional lighting; therefore, it does not focus light on the field of play or shield lighting to avoid glare. In contrast, the proposed project lighting would provide lighting that is designed as sports lighting to focus light on the field of play. The proposed lighting fixtures include proper shielding and directionality that meet the strict guidelines set by the International Dark-Sky Association; contain settings for adjusting light levels to be used during non-competitive events; and smaller point source design for maximum control of lighting and prevention of light spillage and glare. The ball tracker is the only fixture of the proposed lighting that is not directed downward, all other fixtures would be directed downward and would not contribute to skyglow. However, the ball tracker lighting has a glare-free beam, designed to minimize the effects of this lighting component. 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. Furthermore, as explained below, the District submitted the proposed lighting design to the International Dark Sky Association for a Design Analysis and requested a determination as to whether the design meets the program guidelines; the proposed project meets Dark Sky Outdoor Sports Lighting Program criteria and has received a "pass" rating for lighting performance (see Attachment B to this FEIR).

The lighting report prepared by Musco Lighting is included in Appendix B of the Draft EIR. As discussed in last paragraph on Draft EIR page 4.1-25, modeling demonstrates that the proposed stadium lighting would result in zero light trespass off site at public viewpoints, including the American River Parkway. Modeling also demonstrates that glare and skyglow would be reduced to levels that meet International Dark Sky Association standards. Nonetheless, because the project had not yet received the Dark Sky Association "pass" rating, the Draft EIR used a conservative approach and considered that the project could result in uplighting and glare until the project was reviewed by the International Dark Sky Association. In accordance with Mitigation Measure 4.1-2 (Draft EIR page 4.1-26), following publication of the Draft EIR, the District submitted the proposed lighting design to the International Dark Sky Association for a Design Analysis and requested a determination as to whether the design meets the program guidelines. The proposed project meets Dark Sky Outdoor Sports Lighting Program criteria and has received a "pass" rating for lighting performance (see Attachment B to this FEIR). There is no "requirement" at any school for "post-installation field certification" related to lighting, and since the appropriate modeling has been performed by Musco Lighting and the required DarkSky "pass" rating has been obtained, there is no reason to require any type of "certification" post construction. The proposed project has been designed to reduce light spill and glare, as well as manage high angle light pollution to minimize offsite light trespass and sky glow. The Dark Sky Association "Pass" rating indicates that the project's impacts related to nighttime lighting and glare from proposed stadium light stands would be avoided or minimized, consistent with the determination of the Draft EIR.

As discussed in the Draft EIR (pages 4.2-17 to 4.2-19), artificial lighting has the potential to impact the behavior and physiological processes of a variety of wildlife species in a manner that can indirectly lead to reduced fitness and survival. Artificial lighting can interfere with circadian rhythm or alter reproductive behaviors, disrupt foraging and/or movement patterns, cause disorientation, and/or interfere with navigation or migration (Jones et.al 2015; Russart and Nelson 2018; Rich and Longcore 2006).

Lighting characteristics that may influence wildlife behavior and physiological processes include both the intensity (measured in lux or footcandles[1]) and color (measured in kelvin) of lighting (Longcore 2023). As discussed in the Draft EIR (pages 4.2-17 to 4.2-18), in addition to the "Pass" rating from the International Dark Sky Alliance discussed above that demonstrates the minimization of skyglow, 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.

Kelvin (K) measures the color temperature of light. Lower Kelvin lights (approximately 1,800 K–3,000 K) produce warmer, yellowish light, while higher Kelvin lights (approximately 4000 K–5000+ K) emit a cooler, bluer light. Many taxonomic groups are sensitive to light in the blue and into the ultraviolet, and these wavelengths can disrupt biological rhythms (i.e., suppress melatonin production, alter circadian rhythms, and can trigger daytime behaviors at night), and attract or disorient animals (Longcore et.al. 2023). Although manufacturing specifications for the current mobile light towers do not identify the Kelvin, such portable lights are typically design to produce 'daytime-like' lighting conditions in the cooler white-light spectrum, such as around 5,000 K. While the proposed lighting may be similar to or slightly higher, the proposed lighting design accounts for several other important minimization techniques that are recommended by Longcore et.al. (2023) including dimming, shielding and directionality, and restricting use of lighting to a portion of the night (i.e., during use).

Overall, and as acknowledged in the Draft EIR evaluation of potential impacts on biological resources, the project may contribute to minor, short-term seasonal skyglow in the immediate vicinity of the athletic field, which could contribute to minor localized changes in behavior and physiological processes of a variety of wildlife located at or adjacent to the project site. However, as determined in the Draft EIR, the project's operational lighting would result in less-than-significant impacts to biological resources. Operational light-related impacts would largely occur outside the valley elderberry longhorn beetle flight season, and light spill would not reach the riparian habitat present in the American River Parkway that is suitable for other special-status and native wildlife species. Lighting disturbance from additional activities occurring at the athletic fields could result in a small loss of foraging habitat when lighting is used but would be largely restricted to the athletic fields because the project has been designed to direct lighting onto the athletic fields and minimize or avoid light trespass. Light would not reach higher quality riparian foraging habitat in the adjacent Parkway. Changes from the existing lighting regime to the post-project conditions are not expected to rise to a level that would alter food webs or nocturnal wildlife behavior in a significant way. And migratory birds would experience exposure once, as they pass through the area, as opposed to repeated exposure. Therefore, the determination that project's operational lighting impacts to wildlife, including foraging, migration, reproduction (nesting and roosting), would be less-than-significant remains valid.

Please also note that, while not identified as an error by commenters, nor an item that informed the analysis or determination of significance of impact under the Draft EIR, the following error was identified in preparation of this of Final EIR regarding an incorrect reference to the bat roosting season instead of

[1] 1 lux is equal to 0.1 footcandle.

the bat maternity season in regard to operational impacts of the proposed project. The following edit has been made to the EIR, as shown in Chapter 3, "Errata," of this Final EIR:

> Text on page 4.2-19 has been revised as shown in underline (new text) and strikeout (deleted text) below (See Chapter 3, "Errata" of this Final EIR):
>
> *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 maternity season and nesting bird season.*

MASTER RESPONSE 3: NIGHTTIME LIGHT AND GLARE IMPACTS ON SURROUNDING NEIGHBORS

Draft EIR Impact 4.1-2 related to potential nighttime light and glare, which is evaluated on pages 4.1-18 through 4.1-26. Draft EIR Impact 4.1-2 summarizes the results of a photometric analysis for the proposed high-mast light standards that would be installed at the stadium. The photometric analysis was performed by Musco Lighting, and is attached to the Draft EIR as Appendix B. As discussed in last paragraph on Draft EIR page 4.1-25, 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).

The property-line ranges of 0.02-0.13 are along the western school perimeter at the back fenceline of adjacent residential properties. 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, the project applicant elected to provide a comparison of nighttime lighting changes from the surrounding private residences, which was included in the project's Lighting Report. The property-line ranges of 0.40 and 0.37 are at the southern school perimeter and are not applicable to the analysis presented in the Draft EIR, as they are not at a receptor location. The 10,016 candela is a direct, unobstructed line of sight brightness looking directly into fixture's beam, while the 3,992 candela average represents the mathematical average of all measured angles across the light span accounting for engineering controls (such as Musco's reflective visors and internal geometric shielding) keeping the overall ambient glare profile uniform and restricted. Instead of focused beams, the system is designed to compress its directional brightness. Regarding the consideration of this as within the 'low' brightness range, please see Attachment C to this Final EIR that graphically represents the scale and also types of lights and technology over time relative to this scale.

Modeling also demonstrates that glare and skyglow would be reduced to levels that meet International Dark Sky Association standards. Nonetheless, without the Dark Sky Association "pass" rating, the Draft EIR conservatively considered that the project could result in uplighting and glare. Therefore, the impact from potential nighttime lighting and glare was considered potentially significant (Draft EIR page 4.1-25). Mitigation Measure 4.1-2 (Draft EIR page 4.1-26) requires the District to 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 must 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 would not be allowed to commence until the design receives the "pass" rating and approval letter. Therefore, with implementation of Mitigation Measure 4.1-2, the project's impacts related to nighttime lighting and glare would be reduced to a less-than-significant level. Furthermore, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. Finally, the District notes that there is no "requirement" at any school for "post-installation field certification" related to lighting, and since the appropriate modeling

has been performed by Musco Lighting and the required DarkSky "pass" rating has been obtained, there is no reason to require any type of "certification" post construction. For the reasons stated above, no changes to the Draft EIR are required.

MASTER RESPONSE 4: MITIGATION

This project would be implemented by the District and mitigation identified in the Draft EIR was designed to account for how the District is staffed, how Rio Americano High School is staffed, how existing facilities are managed, the responsibilities of individuals associated with event implementation and management, and the steps included in the process of mitigation implementation and monitoring. Mitigation is designed to be consistent with, and provide specific direction for campus operations and event management.

CEQA requires mitigation to be fully enforceable through permit conditions, agreements, or other measures, and monitored via a Mitigation Monitoring and Reporting Program (MMRP) (Guidelines §§15091(d), 15097, 15126.4(a)(2)). CEQA allows agencies to adopt measures that specify performance standards to be achieved through implementation of a subsequent plan prepared by qualified professionals, so long as the performance standards are clear and the commitment is enforceable (Guidelines §15126.4(a)(1)(B)).

Several commenters raised questions or concerns around the timing, enforceability, and effectiveness of proposed mitigation identified in the Draft EIR to reduce significance impacts associated with creating a new source of substantial light or glare (Impact 4.1-1), resulting in a substantial long-term increase in noise levels (Impact 4.3-1), and increasing hazards associated with transportation and circulation (Impact 4.4-3).

Mitigation Measure 4.1-2: Obtain a "pass" Rating for Project Lighting Design from the International Dark Sky Association Backlight, Uplight, and Glare, (Draft EIR page 4.1-26) identifies the enforceable commitment of the District to 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 must refine and resubmit until the design receives a "pass" rating. It provides the clear implementation pathway and performance standard that "approved designs would be validated through receipt of an International Dark-Sky Association approval letter [and] [c]onstruction would not be allowed to commence until the design receives the "pass" rating and approval letter." The measure also identifies timing as requiring the "pass" rating and approval prior to the start of construction and the responsibility being that of the District. Regardless, in this case, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. The District notes that there is no "requirement" for "post-installation field certification" related to lighting, and since the appropriate modeling has been performed by Musco Lighting and the required DarkSky "pass" rating has been obtained, there is no reason to require any type of "certification" post construction.

Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls (Draft EIR page 4.3-25 through 4.3-26) would require the District to implement a suite of measures specifically designed to control stadium event noise and identifies clear responsibility of the District and timing of implementation for various aspects, both in design and ongoing during operational events. The measure has clear performance and operational standards: a numeric L_{max} limit at residential property lines; curfew and public address/band use cutoffs after 10:00 p.m.; design requirements for speaker placement, daytime-only testing; a prohibition on unnecessary public address use; noisemaker bans with screening;

and prescriptive bleacher/ramp treatments. These standards allow detailed implementation through design and event plans.

Mitigation Measure 4.4-3a: Update the MOU with Jesuit High School for a Shared Parking Use Agreement (Draft EIR page 4.4-15 and 4.4-16) would require the District to implement an Event Transportation Management Plan prepared by a qualified transportation professional that would include specific measures to address traffic, pedestrian, and bicycle safety hazards, including during the higher attendance nighttime sports events. The measure requires clear timing of action "before the first varsity home football game or other nighttime stadium event" that is anticipated to exceed on-site parking capacity; the District is the responsible implementing entity. The 1,585-attendee data point provides a transparent, operational trigger, and the measure allows adjustment based on monitored demand, aligning with CEQA's performance-standard approach. The Shared Parking Use Agreement requires defined communication protocols, signage, and security procedures to ensure usable, available overflow spaces during covered events. Reliance on Jesuit High School as a party in this MOU is acceptable under CEQA where the District secures an agreement and retains responsibility for ensuring the outcome (availability of overflow capacity) is achieved. The measure expressly ties the threshold to measured parking conditions, enabling adaptive management while maintaining the performance standard that overflow demand is accommodated legally and safely. This measure is enforceable through a binding Shared Parking Use Agreement and operational protocols and satisfies CEQA's requirements for responsible implementation, performance standards, and monitoring. Furthermore, to demonstrate proactive steps by the District, communication between the District and Jesuit High School leadership is ongoing, with the mutual goal to formalize this MOU. Jesuit High School leadership has communicated their amenability to formalizing a MOU consistent with the Draft EIR mitigation measure. (See E*ast Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 291 [EIR need not analyze proposed agreement, instead it is sufficient if the EIR makes reference to the agreement to alert persons interested in that document to its relevance in the decisionmaking process].)

Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (Section 4.4, "Transportation and Circulation," pages 4.4-15 and 4.4-16) would require the District to implement an Event Transportation Management Plan prepared by a qualified transportation professional that would include specific measures to address traffic, pedestrian, and bicycle safety hazards, including during the higher attendance nighttime sports events. For example, Mitigation Measure 4.4-3b requires the District to provide advance information to potential attendees regarding available parking, designated pedestrian routes, and applicable parking restrictions; provide signage for on-site and off-site event parking; provide event staff and directional signs at campus access points and parking areas; implement appropriate safety treatments identified in the *Localized Traffic Analysis* at roadway crossings that attendees would use; and (as a clear performance standard to be achieved through these actions) 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. This type of plan, which contains specific performance standards and provisions for monitoring and refinement, is routinely used and considered an acceptable way to reduce transportation impacts under CEQA. (See *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 179–184, 188–190; *City of Hayward v. Trustees of Cal. State University* (2015) 242 Cal.App.4th 833, 854 [upholding adaptive transportation management program that allowed agency to monitor and adapt program measures based on future monitoring].)

Minor revisions are made to Mitigation Measures 4.4-3b and 4.4-3c to clarify implementation procedures, have clear performance standards, and limit event attendance associated with proposed stadium improvements to 3,400; these revisions are shown in Chapter 3, "Errata," to this Final EIR.

MASTER RESPONSE 5: TRIP GENERATION AND VEHICLE MILES TRAVELED

Some commenters have identified questions and observations related to the Draft EIR transportation analysis.

This Master Response addresses the following key topics related to the Project's transportation analysis:

- Project trip generation assumptions
- Congestion
- Vehicle Miles Travelled

Project Trip Generation Assumptions

Several comments assert that Project attendance and trip generation are understated because existing attendance was observed at El Camino High School, where parking is more constrained, and that Project trips should be double the values used. The analysis does not understate attendance, for the following reasons.

The analysis is based on observed attendance, not an estimate. Trip generation in Draft EIR Appendix E, "Local Transportation Analysis" (*Localized Transportation Analysis)* Draft EIR Attachment F, "Vehicle Miles Travelled Analysis" (*Vehicle Miles Travelled Analysis)* is based on District ticket sales and attendance records for all eight Rio Americano home games in the 2024 and 2025 seasons (*Localized Transportation Analysis* Attachment C; *Vehicle Miles Travelled Analysis* Attachment A). Attendance at seven of the eight games ranged from about 1,000 to 1,750, and the average across all eight games was 1,669. The single highest-attended game was the August 2025 Rio Americano vs. Jesuit rivalry game, at approximately 3,300 to 3,400 attendees. The Institute of Transportation Engineers (ITE) does not publish a trip rate for a lighted high school stadium. For land uses ITE does not represent, standard practice is to use local empirical data, as done in the *Localized Transportation Analysis* and *Vehicle Miles Travelled Analysis*.

The *Localized Transportation Analysis* accounted for increased attendance at a typical-event scenario to account for moving games on campus. The *Localized Transportation Analysis* did not assume typical attendance would stay at the observed 1,669 average. It raised the "general event" attendance to 2,200 people (about 32 percent above the observed average). The *Localized Transportation Analysis* (p. 4) explains this is because on-campus games become "more readily accessible for students and local members of the Rio Americano High School community". For comparison, the Jesuit High School Stadium Lighting EIR assumed regular-season attendance would increase about 25 percent (from 1,200 to 1,500) when games moved to Friday nights under new lights.

The *Localized Transportation Analysis* also evaluates the rivalry-game attendance. The *Localized Transportation Analysis* includes a "conservative event" scenario of 3,400 attendees, which produces

1,295 inbound vehicles (2,590 vehicle trips). This scenario covers the rivalry game, graduation, and other peak events (*Localized Transportation Analysis* Tables 7 through 10 and 16 through 17; Draft EIR Impact 4.4-3). The *Vehicle Miles Travelled Analysis* also uses this conservatively high scenario (3,400 attendees at Rio Americano compared with 3,301 at El Camino).

The data shows that parking at El Camino High School did not limit attendance. Commenters state that El Camino's 430 on-site spaces and lack of nearby street parking held attendance down. The observed data contradicts this claim. The Rio Americano vs. Jesuit game drew about 3,400 people to El Camino High School, roughly double the attendance of a typical game at the same venue under the same parking conditions. What drives attendance is the matchup (e.g., the rivalry, the visiting school's distance and following), rather than parking supply. Ticket data also shows attendance is roughly correlated with the visiting school's distance (Localized Transportation Analysis [LTA] p. 4). The potential for an increase in attendance with implementation of stadium improvements under the proposed project is reflected in the 32-percent increase in typical attendance and the 3,400-attendee conservative scenario.

Congestion

Concern over intersection delay and level of service (LOS), particularly at American River Drive and Saverien Drive, was a common theme in many comments. Those comments asked why LOS D or F conditions are acceptable, whether the change in delay is "nominal," and whether a traffic signal should be studied. The Draft EIR addresses these concerns by evaluating transportation impacts under CEQA's current metrics and by using the LTA's delay and queue results to identify potential hazards (Draft EIR Impacts 4.4-3 and 4.4-4). Under Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), automobile delay measured by LOS is not a significant environmental impact. The LTA reports vehicle delay and vehicle queues to remain consistent with the Sacramento County Transportation Analysis Guidelines for local transportation analyses. However, vehicle delay is no longer considered in determining environmental impacts under CEQA. Vehicle queues and congestion can be characterized as a safety hazard only on high-speed facilities, where the speed differential between traffic streams exceeds standard thresholds and vehicles queued to turn could spill back into faster-moving through lanes, creating the potential for a high-speed collision. These conditions do not exist within the project study area. American River Drive and Saverien Drive are both low-speed collectors, especially along the school frontage, where the stop-controlled intersection meters traffic. The LTA results are disclosed, including LOS F at Intersection 3 during conservative events (LTA Table 8), and event operations are managed by MM 4.4-3a through 4.4-3c, which include staffed traffic control at that intersection. Comments about delay alone do not identify a CEQA impact.

Furthermore, concern over the time period used in the traffic analysis was a common theme in many comments. Those comments questioned why the LTA used a 5:30-6:30 PM background hour, why several LTA exhibits display different volumes than the Synchro worksheets, and whether game arrivals between 6:30 and 7:45 PM were captured. The Draft EIR addresses these concerns by evaluating Friday evening game conditions using LTA results based on 5:30-6:30 PM background traffic (Draft EIR Impact 4.4-3; LTA p. 2). This response explains why the analysis period is appropriate and conservative, and clarifies an exhibit display error.

The 5:30-6:30 PM period is conservative. School dismissal traffic ends by about 4:00 PM, as the commenter's drone data shows. Observed game arrivals occurred from 6:30 to 7:45 PM (LTA Attachment D), when background traffic is lower. And the LTA loads 100 percent of arrivals into the single analysis hour. Combining game traffic with the 3:00-4:00 PM school peak would model a condition that does not occur. LTA Exhibits 2, 5, and 9 do show 3:00-4:00 PM school-peak volumes under a 5:30-6:30 PM legend. This is a display error only: the Synchro analysis and every reported delay and queue result use 5:30-6:30 PM volumes (LTA Attachments B and E-G).

Vehicle Miles Traveled

Concern over the project's effect on vehicle miles traveled (VMT) was a common theme in many comments. Those comments questioned how VMT can decrease when the stadium is improved, why the VMT memo and the LTA use different attendance figures, whether parking and land-use differences between El Camino and Rio Americano were considered, and whether a recalculation using LTA attendance shows a net increase. The Draft EIR addresses these concerns by comparing game-day VMT for the same event at El Camino and at Rio Americano, which shows a net reduction (Draft EIR Impact 4.4-2; VMT memo). This response clarifies why that comparison is appropriate and why the suggested recalculation in the comments does not show a significant impact.

The VMT memo compares the highest-attended game at El Camino (3,301 attendees) with the same game at Rio Americano at a higher attendance of 3,400 (VMT memo Table 1). The LTA's 2,200 typical-game figure is a buffer used to test local operations, not a forecast of new regional travel (LTA p. 4). Pairing it with the 1,669 observed average mixes two different purposes. About 1,060 of the recalculated 1,440-VMT increase comes from the memo's worst-case assumption that every visitor travels from Inderkum High School (VMT memo Table 3, note 1). Averaged across league opponents, visitor trips are the same length to either venue (VMT memo Table 2). VMT is measured from attendees' home origins, so parking and land uses around each campus do not affect it. Any added on-campus attendance would come mostly from nearby students and residents making short trips that replace other Friday evening trips. Even at 3,400 attendees, game-day VMT drops by 2,098 because home attendees travel shorter distances and some walk, bike, or are already on campus (VMT memo Tables 1 and 3).

MASTER RESPONSE 6: PARKING AVAILABILITY

A number of comments express concern regarding the amount of available parking, particularly related to the occasional events such as “rivalry” football games between Rio Americano and Jesuit High Schools when the attendance could reach higher levels. Commenters also stated a need to demonstrate that adequate parking and transportation arrangements will actually be available.

This Master Response addresses the following key topics related to parking availability:

- Projected “general event” and “conservative scenario” (maximum) attendance at Raider Stadium.
- Locations of on-site and off-site parking.
- Amount of on-site and off-site parking.
- Shared Use Parking Memorandum of Agreement between Jesuit High School and Rio Americano

High School

The Draft EIR analyzes parking availability to the extent that off-site parking may result in an increase in traffic-related hazards. Inadequate parking availability by itself is not considered an impact under CEQA (see Appendix G: Environmental Checklist Form, CEQA Statute and Guidelines). A detailed analysis related to parking demand and supply is contained in Draft EIR Appendix E, "Local Transportation Analysis" (Kimley Horn 2026, pages 13 through 16), and is summarized in Draft EIR Section 4.4, "Transportation and Circulation," (pages 4.4-4 through 4.4-6, and 4.4-12 through 4.4-17). As discussed in Draft EIR Impact 4.4-3 (pages 4.4-12 and 4.4-13), adequate parking will be available during most regular-season games. During high attendance games related to football, as well as the annual graduation ceremony, parking demand may exceed availability. During these events, attendees would be expected to park off-site at locations which may include public streets, and/or the Jesuit High School parking lot.

As explained in the *Local Transportation Analysis* prepared by Kimley Horn in 2026 and attached to the Draft EIR as Appendix E, based on reported home game ticket sales for the 2024 and 2025 football seasons, 3,301 people represents the maximum observed home game attendance from the past two years (District records list 3,397+ including complimentary and will-call; the 3,400-attendee conservative scenario covers both values). As such, a scenario including this level of attendance is considered conservative, and might be expected to occur once per year during Rio Americano High School's "rivalry game" against nearby Jesuit High School. The *Local Transportation Analysis* therefore analyzes both the "general event" of average home football game attendance and a "conservative event" scenario aligning with peak attendance for an event like the Jesuit High School football game. Per the data obtained for Rio Americano High School football attendance counts (Attachment C to the *Local Transportation Analysis*), the calculated attendance of an average Rio Americano High School football game is 1,669 people. Because attendance for football games could be expected to increase due to games being held on campus and therefore becoming more readily accessible for students and local members of the Rio Americano High School community, the "general event" home football game attendance is established as 2,200 people for the purpose of the traffic analysis. The *Local Transportation Analysis* included a Parking Supply/Demand Analysis (see Draft EIR Appendix E, pages 13 through 16), which also included a map showing the specific on-site and off-site parking locations (see Draft EIR Appendix E, Exhibit 11; and Draft EIR Section 4.4, "Transportation and Circulation," Exhibit 4.4-2 [page 4.4-5]). As explained in the Parking Supply/Demand Analysis, the existing Rio Americano High School Campus has a total event parking of 672 publicly available parking stalls. A typical Rio Americano High School home football game would generate a peak parking demand of 823 vehicles during "general event" conditions, which would result in a need for 151 off-site parking stalls. Street parking capacity was determined using segment length and an allowance of 25 feet of space per vehicle. Draft EIR Appendix E, Exhibit 11 (and Draft EIR Section 4.4, "Transportation and Circulation", Exhibit 4.4-2 [page 4.4-5]), shows the locations of parking lots and parking segments in and around Rio Americano High School. As stated on Draft EIR page 4.4-6, 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. There are no parking restrictions along Saverien Drive. Draft EIR Appendix E Table 15 (page 14) provides the calculations of off-site parking availability on local streets near Rio Americano High School. As shown in Appendix E Table 15, a total of 327 off-site parking spaces are available in proximity to the Rio Americano High

School campus. The results of this "general event" analysis are summarized in Draft EIR Impact 4.4-3 (page 4.4-12). Furthermore, as noted above in in the Draft EIR, for a typical event, there is a deficit of about 150 parking spaces. Even if half of the on-street parking spaces were taken there would still be spaces to accommodate demand for these intermittent events. As noted above, under the peak event, capacity is evaluated and identifies the parking deficit, and the Draft EIR requires Mitigation Measure 4.4-3a to address this parking concern, as well as Mitigation Measures 4.4-3b and 4.4-3c to address vehicle circulation during events.

For the "conservative event" scenario with higher attendance, there would be need for 623 off-site parking stalls (Draft EIR Appendix E, Table 16 [page 15]). With the available 327 off-site parking spaces, there would still be a deficiency of 296 parking spaces during the "conservative event" scenario. As described in detail in Draft EIR Appendix E (page 15) and shown on Draft EIR Appendix E, Exhibit 11 (and Draft EIR Section 4.4, "Transportation and Circulation," Exhibit 4.4-2 [page 4.4-5]), additional street parking is available farther along American River Drive, Saverien Drive, and other nearby neighborhood streets beyond the 327 spaces reported in this section. The results of this "conservative scenario" analysis are also summarized in Draft EIR Impact 4.4-3 (pages 4.4-12 and 4.4-13). Impact 4.4-3 was identified as potentially significant (Draft EIR page 4.4-13).

Furthermore, Rio Americano High School and Jesuit High School have a verbal Memorandum of Understanding that permits the use by Jesuit of Rio Americano High School parking during events at Jesuit High School in which a higher level of attendance is expected than may be accommodated by Jesuit High School's on-site parking. Draft EIR Mitigation Measure 4.4-3a requires that, 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, the District will coordinate with Jesuit High School to update its Memorandum of Understanding regarding shared parking. This Mitigation Measure also includes the requirement that the Shared Parking Use Agreement shall include "…communication protocol to both confirm that there are not existing high-attendance events 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", thereby addressing commenters' concerns with regard to the operational scenario in which both Rio Americano High School and Jesuit High School could host high-attended events concurrently and negate the effectiveness of the shared-parking Memorandum of Understanding. In support of the proposed project and during the preparation of this Final EIR, leadership from the District and Jesuit High School have been in communication with regard to the formal drafting and adoption of this Memorandum of Understanding and are both in agreement to prepare and adopt such an agreement, ensuring it would be in place well before the proposed project is operational. Therefore, attendees at Rio Americano High School events would be able to 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 updated Memorandum of Understanding would also provide for signage directing attendees to Jesuit Parking, and appropriate security protocols. Thus, the schools' willingness to work together supports the Draft EIR's conclusion that the MOU and integrated mitigation measures will reduce impacts to less than significant levels. (See *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 188–191; *Neighbors for Smart Rail v. Exposition*

Metro Line Construction Auth. (2013) 57 Cal.4th 439, 465–466; *East Sacramento Partnerships for a Livable City v. City of Sacramento* (2016) 5 Cal.App.5th 281, 291 [EIR need not analyze proposed agreement, instead it is sufficient if the EIR makes reference to the agreement to alert persons interested in that document to its relevance in the decisionmaking process].)

MASTER RESPONSE 7: OPERATIONS MANAGEMENT, INCLUDING TRAFFIC MANAGEMENT AND EMERGENCY EVACUATION.

Several commenters stated that the Draft EIR should provide a detailed operational management plan designed to address traffic, pedestrian, and bicycle safety hazards, particularly during the higher attendance nighttime sports events. Commenters also requested that the District establish operating limits, monitor compliance, and require corrective action if a violation occurs. Commenters also requested that the District prepare an evacuation plan to ensure that safe egress from the school campus is provided for during high-capacity sports events in case an evacuation were to become necessary due to a fire or flood hazard. This Master Response addresses the following key topics:

- School emergency plans required by the California Education Code.
- Rio Americano Night Event Management Standards.
- Traffic, pedestrian, and safety standards for sports events at Raider Stadium.
- Rio Americano High School evacuation plan.

The District maintains, and periodically updates as necessary, emergency plans for all of its schools, per California Education Code Sections 32280–32289.5, which require all K–12 public schools to develop and maintain a Comprehensive School Safety Plan. In addition to this ongoing requirement for Rio Americano High School, the Division of the State Architect (DSA) provides design and construction oversight for Kindergarten through Grade 12 schools, community colleges, and various other state-owned and leased facilities. DSA has review and approval authority over the proposed project improvements.

All plans for the stadium and associated site improvements must comply with the California Building Code/Title 24 Standards and related fire codes. Plans are submitted to DSA, which conducts concurrent reviews in three core disciplines: Fire and Life Safety, Structural Safety (Field Act compliance), and Access Compliance (Accessibility/ADA). While DSA has final jurisdiction, the local fire authority (Sacramento Metropolitan Fire Department) is also consulted for input on fire flow, hydrants, and emergency vehicle access. Construction cannot legally begin until DSA issues a formal approval stamp and project application number. During construction, a DSA-certified Project Inspector oversees daily work to ensure compliance with approved plans, and all fire and life safety systems undergo required testing and certification. Upon completion, DSA certifies the project only after all requirements are met and final documentation is submitted. With regard to safe dispersal areas, gates, and egress, DSA specifically reviews and approves all aspects of safe dispersal areas and egress gates for the project. Gates along the path of travel and those enclosing the dispersal area are heavily regulated to ensure both daily security and emergency life safety. With regard to the bleacher and dispersal area design, the safe dispersal area is sized to provide at least 5 square feet of net usable space per person for the total occupant load of the bleachers, exceeding code minimums. The dispersal area is located at least 50 feet from the perimeter of the bleachers, with an unobstructed path of travel for evacuees. Proposed bleacher seating provides for 2,575 seats, and stadium exiting is sized for a total of 3,425 people, more than sufficient for any maximum event attendance. The DSA review and certification process, in coordination with the

Sacramento Metropolitan Fire Department, ensures that all aspects of emergency egress, safe dispersal, and life safety for the stadium project not only comply with but in many cases exceed applicable state requirements. No school facility may be constructed or occupied without DSA approval and certification, providing a high level of assurance that the project will meet all relevant safety standards prior to implementation.

As stated in Draft EIR Section 3.2.2, "Operations Plan" (page 3-6), 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.

Draft EIR Mitigation Measure 4.3-1b (Section 4.3, "Noise and Vibration," pages 4.3-25 and 4.3-26) would require the District to implement a suite of measures specifically designed to control stadium event noise. These measures would apply to public address system design and operation, public address system testing and operation, event scheduling and use restrictions, artificial noisemakers and spectator controls, and bleacher and ramp noise controls. For example, the public address system would be adjusted, and additional controls would be installed, if necessary, to achieve a maximum public address system noise level of 70 dBA L_{max} at the nearest residential property line. Also included is the requirement that 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. Prohibitions on all artificial noisemakers (such as cowbells, air horns, etc.) and sound-deadening treatment to reduce bleacher noise from foot stomping, are also included, among others.

Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (Section 4.4, "Transportation and Circulation," pages 4.4-15 and 4.4-16) would require the District to implement an Event Transportation Management Plan prepared by a qualified transportation professional that would include specific actions to address traffic, pedestrian, and bicycle safety hazards, including during the higher attendance nighttime sports events. For example, Mitigation Measure 4.4-3b requires the District to provide advance information to potential attendees regarding available parking, designated pedestrian routes, and applicable parking restrictions; provide signage for on-site and off-site event parking; provide event staff and directional signs at campus access points and parking areas; implement appropriate safety treatments identified in the *Localized Traffic Analysis* at roadway crossings that attendees would use; and 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. This type of plan, which contains specific performance standards and provisions for monitoring and refinement, is routinely used and considered an acceptable way to reduce transportation impacts under CEQA. (See *Mission Bay Alliance v. Office of Community Investment & Infrastructure* (2016) 6 Cal.App.5th 160, 179–184, 188–190; *City of Hayward v. Trustees of Cal. State University* (2015) 242 Cal.App.4th 833, 854 [upholding adaptive transportation management program that allowed agency to monitor and adapt program measures based on future monitoring].)

A detailed analysis of potential project-related impacts from impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan is provided in Draft EIR Impact 5.7-5 (Draft EIR pages 5.7-24 and 5.7-25). As stated on page Draft EIR 5.7-24, "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." [Emphasis added.] As also stated on Draft EIR page 5.7-24, "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)." Similar to the potential flood hazard issue, the District would monitor the progress of any fires in the project vicinity, through coordination with the Sacramento County Office of Emergency Services, the Sacramento Metropolitan Fire District, and through websites such as CalFire and WatchDuty and, and in event of a threat to students and teachers at the Rio Americano campus, classes and sporting events would be cancelled to allow students to stay home with their families in the event an evacuation should become necessary. In other words, as part of the District's standard operating procedures for every school, fire or flood hazard scenarios would be monitored and school classes and sporting events would be cancelled ahead of time; thus, it is highly unlikely that an evacuation from a fire or flood hazard would be necessary during a sporting event at the school campus. Furthermore, there are no chemical manufacturing facilities or propane tank farms in the project vicinity that would present a hazard to the campus from explosion. A detailed discussion regarding local and regional roadways that could serve as evacuation routes is provided on Draft EIR pages 5.7-24 and 5.7-25. Furthermore, evacuation planning is part of the school's Comprehensive School Safety Plan referenced above.

Therefore, the impact from impairment of or physical interference with an adopted emergency response plan or emergency evacuation plan (Draft EIR Impact 5.7-5) was found to be less than significant. No change to the Draft EIR is necessary.

MASTER RESPONSE 8: ALTERNATIVES

Several commenters stated that the alternatives considered by SJUSD and carried forward for analysis in the Draft EIR are either too scant or too narrowly focused and that additional alternatives should have been considered in the EIR, including: a reduced-height or reduced-illumination alternative involving shorter light poles with shielded structures; a reduced-capacity and/or reduced-use alternative, involving fewer seats and/or events; an alternate or split venue alternative that involves keeping high-capacity events at El Camino High School; an alternative with an earlier enforceable curfew and fewer or no amplified events; and an alternative that reconfigures the layout and direction of the field and light poles. The SJUSD has determined that all of the above-suggested alternatives are not potentially feasible and therefore not eligible for analysis in the EIR, as explained further below.

This Master Response addresses the following key topics related to alternatives:

- Constructing the Project off-campus on a new site
- Using alternate existing off-site stadiums or "splitting" venues for games and events
- Limiting nighttime operations or modifying the scheduling for stadium and on-field events
- Reconfiguring the stadium and athletic field layout (analyzed in the Draft EIR as "Alternative 2")
- The No Project Alternative (analyzed in the Draft EIR as "Alternative 1")

Statutory Background and Requirements for Analyzing Alternatives

CEQA Guidelines, section 15126.6, subdivision (a), requires that an "EIR shall describe a range of reasonable alternatives to the project, or to the location of 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." (CEQA Guidelines, § 15126.6, subd. (a); *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 566; *Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal.3d 376, 392–393.)

CEQA Guidelines, section 15126.6, subdivision (b), states that "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 shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project…" (CEQA Guidelines, § 15126.6, subd. (b).)

CEQA Guidelines, section 15126.6, subdivision (c), states that the "range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts." (CEQA Guidelines, § 15126.6, subd. (c).)

CEQA Guidelines, Section 15124, subdivision (b), explains that a "clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings." (CEQA Guidelines, § 15124, subd. (b).) And in crafting project objectives and the project alternatives that flow from them, CEQA does not restrict a lead agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives. (*California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276–277; *In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1166 [alternatives analysis may be structured "around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"]; *Save San Francisco Bay Assn. v. San Francisco Bay Conservation and Development Com.* (1992) 10 Cal.App.4th 908, 929 [lead agency may limit alternatives to those "which could feasibly accomplish the project's purpose"].)

Finally, "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." (CEQA Guidelines, § 15126.6, subd. (f).) Thus, in order to merit analysis in an EIR, an alternative must be: (1) potentially feasible; (2) capable of attaining "most" of the basic project objectives; and (3) capable of avoiding or substantially lessening any of the significant effects of the project. (CEQA Guidelines, § 15126.6, subd. (c).) "Feasible" is defined as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines, § 15364.) As such, an EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative. (*Residents Ad Hoc Stadium Committee v. Board of Trustees* (1979) 89 Cal. App.3d 274, 286–290; CEQA Guidelines, § 15126.6, subd. (f)(3).)

Here, the only significant and unavoidable (i.e., no feasible mitigation capable of reducing significant impacts below the significance threshold) impact is from construction and operational noise that will result from the Project. All other potential impacts have been determined to be capable of being mitigated to less-than-significant levels if the recommended mitigation is adopted and implemented by the District. Based on this conclusion, the District appropriately selected and evaluated a reasonable range of alternatives that it deemed potentially feasible and that would avoid or substantially lessen any of the Project's significant noise impact. (CEQA Guidelines, §§ 15126.6, subd. (f), 15364.)

Off-Campus Alternative

Section 6.3 of the Draft EIR describes the alternatives to the proposed Project that were considered but not carried forward for further CEQA analysis, as well as the process and criteria for selecting the alternatives that were ultimately analyzed. (See Draft EIR, pp. 6-3 to 6-4; see also 1-1 to 1-2.)

The District initially considered an off-campus alternative but ultimately determined it to be infeasible, finding it would not reduce the proposed Project's significant effects to a less-than-significant level, unless it were located far from any existing residential development and could avoid significant noise and lighting effects. The Draft EIR explains, however, that locating a new stadium further from the existing RAHS campus and nearby student residences would result in increased travel distances to the stadium, which would, in turn, produce more associated criteria air pollutants and greenhouse gas emissions. Relatedly, while relocating stadium operations to a different site may reduce the proposed Project's impacts to noise within the Project Site's environmental setting, these impacts would not be eliminated but would simply be relocated to a different area. Therefore, this would not meet CEQA's criteria that, for off-site alternatives, "only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR." (CEQA Guidelines, § 15126.6(f)(2)(A).)

Moreover, developing an entirely new stadium on a different property could result in other new or more severe significant impacts that the proposed Project would not produce by virtue of it being constructed within RAHS's existing developed footprint. For instance, an off-site alternative on a new site far enough

away from any existing residential development to avoid noise and lighting effects on neighbors could significantly impact visual character, special-status species, wildlife, or habitat, damage or destroy archeological or cultural resources, or produce substantial new noise and traffic impacts. Finally, if no new site is available within a reasonable distance of RAHS and its enrolled population, then most Project objectives would not be obtained. (Draft EIR, p. 6-3; CEQA Guidelines, § 15126.6(b); see *Jones v. Regents of University of California* (2010) 183 Cal.App.4th 818, 827–828 [off-site campus alternative did not need to be further analyzed because it would not achieve primary project objective of developing a more cohesive laboratory atmosphere by dividing staff and facilities]; see also *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 576–578 [EIR not deficient for not further analyzing offsite stadium alternative where such an alternative would have many of the same if not more of the proposed project's environmental impacts].)

For these reasons, the District rejected an off-site alternative for analysis in the Draft EIR because developing the proposed Project in a different off-site location may not avoid or substantially lessen anticipated significant environmental impacts, and there are no alternate sites that would allow the District to achieve most of the Project's states objectives. (CEQA Guidelines, § 15126.6, subd. (f)(2)(A) ["only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR"]; .) None of the comments submitted on the Draft EIR provide any substantial evidence that an off-site location for the proposed Project would reduce any of the adverse physical environmental impacts identified in the Draft EIR. (See *Residents Ad Hoc Stadium Com.*, *supra*, 89 Cal.App.3d at pp. 288–289; accord *Save Our Residential Environment v. City of West Hollywood* (1992) 9 Cal.App.4th 1745, 1752–1754 [EIR need not analyze off-site alternatives when no suitable alternate location exists].)

Alternate Stadium or "Split Venue" Alternative

Several commenters have suggested that the District explore utilizing alternate stadiums or "split venues" for certain sporting and high-capacity events. As the Draft EIR explains, the District rejected for further analysis an alternative wherein it would arrange to use another facility for various practices, games, and other school-related events. Section 6.3.3 of the Draft EIR discusses why use of either Hornet Stadium at California State University, Sacramento, or Hughes Stadium at Sacramento City College would be infeasible. (Draft EIR, p. 6-4.)

The Draft EIR also explains why it did not analyze a "split-venue" alternative by maintaining the District's current use of the El Camino High School Stadium. (Draft EIR, p. 6-4.) The Draft EIR explains that holding future nighttime events at any one of these three stadiums would not reduce the proposed Project's environmental impacts in a way that would be different from the No Project Alternative that the Draft EIR did analyze. Furthermore, holding events at any of these stadiums would result in increased generation of greenhouse gases and criteria air pollutants as compared to the proposed Project due to the longer average travel distances that participants and attendees must traverse. A split-venue alternative would not achieve the Project's objectives of providing a well-suited facility that enhances RAHS as a Center of Community, or enhancing school facilities and the athletic experience for RAHS enrollees and family members within the immediate community that the school serves.

Finally, because the District does not have control over the Hornet or Hughes stadiums, it could not dictate scheduling for RAHS events. This, too, would thwart the Project's stated objectives to increase flexibility for scheduling on-campus outdoor activities over the course of the day and evening, expand RAHS's capability to host athletic and non-athletic events and conduct outdoor student activities during cooler parts of the day, or optimize scheduling opportunities for athletic practices and competitions outside the normal times of day when regular classroom instruction is held. (See *California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 981, 998, 1001–1003 [lead agency may balance competing interests in making feasibility findings to reject certain alternatives, including that an alternative would defeat project objectives, is infeasible for social or technical reasons, or is undesirable from a policy standpoint].)

For these reasons, an alternative considering the use of an existing stadium or "split-venue" option was not considered for further analysis because it would not attain most of the Project objectives and would not substantially lessen any significant environmental impacts. (CEQA Guidelines, § 15126.6, subd. (c).)

Capped Attendance and Limited Nighttime Operations/Curfew or Modified Schedule

Several commenters suggested the District should have considered an alternative that involved limited nighttime operations or an earlier mandatory curfew or capped attendance for evening games and events.

As outlined above, in considering feasible alternatives, the District relied on the Project's six stated objectives to refine its selection and identify those that would be most feasible, achieve most basic purposes of the Project, and could avoid or substantially lessen one or more of the Project's significant impacts. (CEQA Guidelines, § 15126.6.) As relevant here, four of those objectives relate to the school's ability to schedule and host certain athletic and all-school gatherings, including:

- "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"
- "Increase flexibility for scheduling on-campus outdoor activities over the course of the day and evening"
- "Optimize scheduling opportunities for athletic practices and competitions outside of normal classroom instruction times of the day"

(Draft EIR, page 6-3.) Based on these objectives, the District considered but ultimately rejected for further consideration and analysis in the Draft EIR an alternative that would reschedule practices and games to the morning instead of holding them at night, which would eliminate the need for permanent light at Raider Stadium. (Draft EIR, p. 6-4 [Section 6.3.2].) The Draft EIR explains, though, that this modified schedule would not be able to accommodate weekday games because there would be

insufficient time in the morning to host the games when considering daily school instruction and work schedules. Therefore, this alternative would not achieve most if not all of the stated Project objectives.

For similar reasons, the Draft EIR did not consider a capped or reduced capacity alternative. (See California Native Plant Society v. City of Santa Cruz (2009) 177 Cal.App.4th 957, 993 [led agency need not include alternatives to a component of a project]; *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 355-356 [lead agency need not consider variations of the same project alternative].) Capping or reducing the capacity of the Project's proposed facilities would directly conflict with the objective to provide a facility that is well-suited for and has the capacity for existing athletic and non-athletic events, including all school assemblies, graduation, and other special and regular events, as well as the objective to expand RAHS's capability to host such events. An earlier curfew or modified schedule with limited nighttime operations for the use of RAHS's facilities would also conflict with the stated objective to increase flexibility for scheduling on-campus outdoor activities during cooler parts of the day, such as the evening, and the objective to optimize scheduling opportunities for athletics outside of normal classroom instruction daytime hours (i.e., in the evening). In other words, an earlier curfew point would prevent the school from scheduling practices and competitions during the evening, which is typically the cooler part of the day that occurs outside of classroom instructional hours. Finally, reducing the proposed Project's capacity or operational times would not reduce the significant and unavoidable noise impact. As the Draft EIR explains in Section 4.3, the Project's noises and their ensuing impact are not based on their duration or the time of day during which they occur, but instead based on anticipated decibel levels. The EIR, therefore, imposes Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls, which requires the District to impose various measures designed to control stadium event noise, including a 10:00 p.m. curfew for use of the public address speaker system and school band performance. (Draft EIR, pp. 4.3-25 to 4.3-26.)

For these reasons, a capped attendance or limited nighttime operations alternative would not accomplish majority of the Project Objectives and would not meaningfully reduce the Project's significant noise impact. Therefore, it was reasonable for the District to not select it for further consideration in the Draft EIR. (See *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 576–578 [infeasible alternatives that do not meet project objectives need not be studied even if they are imagined to be environmentally superior]; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 276–277 [CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives].)

Reconfigured Stadium Layout Alternative (Alternative 2)

Several commenters have suggested SJUSD should consider an alternative configuration for the proposed stadium and athletic fields. After receiving analogous comments on the Notice of Preparation, the District determined such an alternative would meet all Project Objectives, so the Draft EIR analyzed this as "Alternative 2: Reconfigure Stadium and Athletic Fields." (See Draft EIR, p. 6-5.) Under this alternative, Raider Stadium would be demolished and rebuilt at the northeastern end of campus adjacent to and south of the American River Parkway, or approximately 875 feet from the Parkway. The existing baseball and soccer fields would be relocated to the south where Raider Stadium is currently located. The relocated

stadium would include all proposed features, including high-mast lighting, new and expanded bleacher seating, a new press box, and an upgraded public address system, while the relocated athletic fields would not be lit at night. Moreover, to provide a noise and visual buffer for residents to the north and east, Alternative 2 would provide a 100-foot-wide landscaped area consisting primarily of fast-growing evergreen trees specifically designed to provide an acoustical reduction of 5 to 8 A-weighted decibels (dBA), along the campus property boundary north and east of the new stadium.

The Draft EIR explains how Alternative 2 would produce either the same or greater impacts to all resource categories. (Draft EIR, pp. 6-7 to 6-17.) Specifically, a reconfigured stadium layout would produce greater impacts to: aesthetic visual character, air quality during construction, cultural resources, energy resources during construction, greenhouse gas emissions during construction, hazards and hazardous materials, hydrology and water quality, noise and vibration, transportation during construction, tribal cultural resources, and utilities and service systems. (See p. 6-17 [Table 6.1].) So, although Alternative 2 would meet all Project Objectives, it would not substantially lessen any of the proposed Project's impacts—in fact, it would make them even more significant, thus making it infeasible. (CEQA Guidelines, § 15126.6, subd. (c)(iii); *Residents Ad Hoc Stadium Com.*, *supra*, 89 Cal.App.3d at p. 288; *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 921 [agency may properly determine that no feasible locations exist either because basic project objectives cannot be achieved at another site or because there are no sites meeting the criteria for feasible alternate sites].)

Moreover, as part of its consideration of Alternative 2, the District appropriately considered all relevant factors as to its feasibility, including site suitability, economic viability, and availability of infrastructure, among other factors. (CEQA Guidelines, § 15126.6, subds. (a), (f).) In weighing these considerations, the District evaluated the costs and additional expenditures that it would have to incur to fund relocating and reconstructing the entire stadium and athletic facilities, as opposed to simply improving them (as contemplated by the Project). In weighing these costs against the benefits, along with the few environmental benefits this alternative would yield when compared to against the proposed project, the District concluded that the significant economic impact to the District's building fund would produce such an economic hardship to the District that it would render Alternative 2 impractical and infeasible. Given this factor, along with all other considerations as to this alternative's feasibility, the Draft EIR appropriately concluded that Alternative 2 would not be feasible. (See *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 351–352 [reiterating that a project alternative may properly be rejected as economically infeasible if the reduced profitability of the alternative is sufficiently severe as to render it impractical to proceed with the project]; *Goleta Union School Dist. v. Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025, 1033–1034 [agency's consideration of alternatives is subject to the rule of reason; how effects are mitigated or how alternatives are selected, including funding implications, is left to the discretion of the lead agency].) Nothing further was required.

The No Project Alternative (Alternative 1)

Several commenters also suggested that the No Project Alternative does not adequately explain how or why it is environmentally superior if it simply maintains existing operations, which, in turn, does not achieve Project Objectives.

CEQA Guidelines, section 15126.6, subdivision (e), requires that an EIR evaluate a specific alternative of "no project" along with its impact. (CEQA Guidelines, § 15126.6, subd. (e).) "The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." In analyzing the No Project Alternative, the CEQA Guidelines further provide that, "[i]f the project is other than a land use or regulatory plan, for example a development project on identifiable property, the 'no project' alternative is the circumstance under which the project does not proceed. Here, the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved." (CEQA Guidelines, § 15126.6, subd. (e)(3)(B).)

As described in Section 6.4.1 on pages 6-4 to 6-5 of the Draft EIR, the proposed Project site is zoned and designated for school uses. The site is currently home to the existing RAHS campus. Under the No Project Alternative, the existing land uses, buildings, parking lots, and landscaping would remain unchanged, and the proposed site redevelopment would not occur. The Project site would continue to be operated by SJUSD as RAHS and no site improvements would be made. By virtue of this, sports practices and games would continue to occur regularly throughout their respective seasons, including evening and nighttime practices and games that would continue to rely on existing temporary 11.7-horsepower diesel-powered LED light towers. RAHS would also continue to use the El Camino High School Stadium—located approximately 3 miles north—which has high-mast lighting for nighttime games. Therefore, student athletes and spectators would continue to drive to that campus to view games. Taken together, these current operations would not meet any of the Project's objectives. Nevertheless, should operations remain as they currently are under the No Project Alternative, some resource areas would have slightly reduced or slightly greater impacts. The Draft EIR explains on pages 6-8 to 6-16 how the No Project Alternative will have greater or reduced impacts to individual resources, and summarizes those conclusions in Table 6-1 on page 6-17. Because it would reduce impacts to 11 resource areas, while only increasing impacts to 4 resource areas, the Draft EIR appropriately concludes that the No Project Alternative is the environmentally superior alternative, and thus accordingly analyzes it as such, as CEQA requires. (See *City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 920–923; see also *Residents Ad Hoc Stadium Com.*, *supra*, 89 Cal.App.3d at pp. 288–289 [continued use of stadium is "clearly a no-project alternative as the status quo would be continued"].)

Although the No Project Alternative is environmentally superior, the District appropriately rejected it is as infeasible because it would not accomplish or achieve any of the stated Project Objectives. Many commenters question this conclusion and ask whether the No Project Alternative could "partially" achieve some of the stated objectives. But CEQA does not require a lead agency and EIR to craft alternatives to address problems that the agency initially set out to solve. "When an agency has deliberately limited the scope and nature of the problem that it wants to solve, the agency should not be required to consider alternatives that address a much bigger problem or that add difficult issues the agency has chosen not to tackle." (*Planning & Conservation League v. Dept. Of Water Resources* (2024) 98 Cal.App.5th 726, 760–761; see *id*. at p. 763 ["an EIR is not obliged to examine every conceivable variation of the no project alternative"].) Here, achieving only part of an objective would defeat the very problem that the District seeks to solve: providing a center for community that can host and accommodate RAHS events on the RAHS campus. Because the No Project Alternative would not achieve any of the six

stated Project Objectives, the EIR appropriately considered it to describe the existing conditions and offer a plausible vision for the foreseeable future, including a forecast of the environmental impacts of preserving the status quo. (*Id.* at p. 762.) Nothing more was required under CEQA.

MASTER RESPONSE 9: CUMULATIVE IMPACTS

This Master Response addresses comments received on the Draft EIR concerning the potential cumulative impacts of the Project and related projects. Several commenters contend the Draft EIR does not adequately analyze potential cumulative impacts associated with other related or nearby projects, including: the District's Rio Americano High School Cell Tower approval; the U.S. Army Corps of Engineers' American River Common Features Flood Risk Management Project – Erosion Contract 3B; the District's Ralph Richardson Center; overlapping events and operations at Jesuit High School, including those stemming from the stadium lights project and proposal to open enrollment to female students. This Master Response addresses CEQA's requirements for analyzing cumulative impacts and the import of these projects in the cumulative environmental setting.

Statutory Background and Framework for Analyzing Cumulative Impacts

The Draft EIR discusses the Project's potential cumulative impacts in Section 7.1 on pages 7-1 to 7-13. As discussed on page 7-1, CEQA Guidelines, section 15130, requires that an EIR consider the environmental effects of a proposed project individually as well as cumulatively. (CEQA Guidelines, § 15130.) CEQA Guidelines, section 15355, defines "cumulative impacts" as two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts. "The individual effects may be changes resulting from a single project or a number of separate projects." (CEQA Guidelines, § 15355, subd. (a).) "The cumulative impact from several projects is 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." (CEQA Guidelines, § 15355, subd. (b).) A cumulative impact is one "which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." (Guidelines, § 15130, subd. (a)(1).) "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." (Guidelines, § 15355, subd. (b).)

CEQA Guidelines, section 15130, sets forth a two-step process for determining cumulative impacts and establishing the cumulative context within which a project may be considered. (See *League to Save Lake Tahoe Mountain etc. v. County of Placer* (2022) 75 Cal.App.5th 63, 148.) The first step requires the agency to decide whether or not the combined effects from the proposed project and other related projects would result in a potentially significant cumulative impact. If the answer is "no," then the EIR needs only to briefly indicate why the cumulative impact is not significant or discussed further. (*Ibid.* ["CEQA requires no cumulative impact analysis in the EIR if the combined impact is not significant or the project's incremental contribution to the impact is not cumulatively considerable"].) If the answer is "yes," then the analysis proceeds to the second step, which is to determine whether the proposed project's incremental effects are "cumulatively considerable." Under CEQA Guidelines, section 15065, subdivision (a)(3), "cumulatively considerable" impacts occur when the incremental effects of an individual project

are significant when viewed in connection with the effects of past, current, or probable future projects. Subdivision (a)(3) clarifies that a project's contribution is considered less than "cumulatively considerable" if the project is required to fund its fair share of a mitigation measure or implement mitigation measures designed to alleviate the cumulative impact. The lead agency may rely on this, along with facts and corresponding analyses, to support its conclusion that the proposed project's contribution to certain impacts will be rendered less than cumulatively considerable.

CEQA Guidelines, section 15130, subdivision (b), explains that an EIR's discussion of cumulative impacts should reflect "the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone." (CEQA Guidelines, § 15130, subd. (b).) Instead, the discussion of cumulative impacts "should be guided by the standards of practicality and reasonableness." (*Ibid.*) As such, subdivision (b)(1) provides two ways an EIR can establish the cumulative context within which a project may be considered: (1) through the use of a list of past, present, and probable future projects; or (2) through the use of adopted projections from a general plan, other regional planning document, or a certified EIR for that planning document. (CEQA Guidelines, § 15130, subd. (b)(1).) As explained in Section 7.1, the Draft EIR utilized the first option by preparing a list of past, present, and probable future projects to establish the cumulative context against which to analyze the Project. (Draft EIR, pp. 7-1 to 7-2.)

When relying on a list of projects, "factors to consider when determining whether to include a related project should include the nature of each environmental resource being examined, the location of the project and its type." (CEQA Guidelines, § 15130, subd. (b)(2).) In populating this list, the District retains discretion to determine which closely related and probable future projects should be considered in the cumulative impacts analysis. (*Gray v. County of Madera* (2008) 167 Cal.App.4th 1099, 1127–1128.) For purposes of being included in a cumulative impacts analysis, a "probable future project" is one where "the applicant has devoted significant time and financial resources to prepare for any regulatory review[.]" (*Ibid.*) Thus, "mere awareness of proposed expansion plans or other proposed development does not necessarily require the inclusion of those proposed projects in the EIR." (*Ibid.*, citing CEQA Guidelines, § 15130, subd. (b)(1)(A); *City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 398 ["CEQA does not require that an EIR consider the potential cumulative impacts of every proposed future project; it requires only that an EIR consider the cumulative impacts of probable future projects"].) By virtue of this, the District may set a reasonable "cutoff date" to determine which projects should or should not be included in the EIR's cumulative analysis. (*Gray*, *supra*, 167 Cal.App.4th at p. 1128; accord *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 337 [agencies may set cut off dates for cumulative impact analyses because projects "are constantly being fed into the environmental review process"].)

Moreover, due to its expertise, the District retains significant discretion to select the assessment area from which it analyzes cumulative impacts. (*City of Long Beach v. Los Angeles Unified School Dist.* (2009) 176 Cal.App.4th 889, 903; CEQA Guidelines, § 15130, subd. (b)(3).) The cumulative study area is defined based on an analysis of the geographical scope relevant to each particular environmental issue. Therefore, the cumulative study area for each individual impact may vary. The specific boundaries and

environmental setting for each resource area are identified in their applicable analytical section in Chapter 4 of the Draft EIR.

The EIR's Analysis of Related Projects and Potential Cumulative Impacts

The Draft EIR presents a list of proposed development projects in the area of the Project that could affect conditions in the assessment area. (Draft EIR, p. 7-2 [Table 7-1].) Table 7-1 identifies three projects to inform the cumulative setting: (1) the District's Cell Tower at RAHS, which the District approved and deemed categorically exempt from CEQA; (2) the completed Stadium Lighting project constructed by Jesuit High School and approved by the County; and, (3) the District's proposed Ralph Richardson Center Modernization Project. (Draft EIR, p. 7-2.) Consistent with CEQA Guidelines, section 15125, this list of projects represents the cumulative baseline, representing conditions that existed when the Notice of Preparation (NOP) for the Draft EIR was published on January 5, 2026. By virtue of this, the cumulative baseline setting necessarily encompasses and incorporates into the Draft EIR's analyses any effects from past RAHS projects. (See *Environmental Protection Information Center v. Cal. Dept. of Forestry and Fire Protection* (2008) 44 Cal.4th 459, 524–525 [obligation to consider present project in the context of relevant prior activities necessarily included in environmental baseline for cumulative impacts analysis].)

Because the Project would have no impacts to agricultural and forestry resources, mineral resources, population and housing, public services, and wildland fire hazards, the cumulative analysis likewise concludes the Project will not contribute to any cumulative impacts to these resource areas and therefore does not analyze them further. (Draft EIR, p. 7-2.) Instead, the cumulative analysis incorporates a discussion of cumulative impacts that reflect the severity of impacts and their likelihood of occurrence, but in less detail than is provided throughout the rest of the Draft EIR for effects that are attributable to the Project alone. (Draft EIR, p. 7-2; CEQA Guidelines, § 15130.) In doing so, the cumulative setting in the Draft EIR "give[s] the public and decisionmakers the most accurate and understandable picture practically possible of the project's likely near-term and long-term impacts." (CEQA Guidelines, § 15125.)

The District selected the above three projects based on their geographic proximity to the proposed Project and their likelihood for contributing to incremental environmental effects the Project may share with them. CEQA does not prescribe a geographic radius or mapping requirement for assessing cumulative development. Nevertheless, for each environmental topic addressed throughout the impact analyses in Chapter 4, the geographic scope used to assess cumulative impacts is described and varies depending on the topic being analyzed. With this framework, the Draft EIR analyzes the cumulative context of the proposed Project's potential impacts and those potential impacts from the three selected projects. The Draft EIR then includes a discussion of cumulative impacts for each impact area based on specific significance criteria. Based on this criteria, the Draft EIR concludes that the proposed Project would not result in any significant and unavoidable cumulative environmental impacts to: aesthetics (pp. 7-2 to 7-3), air quality (pp. 7-3 to 7-5), biological resources (pp. 7-5 to 7-6), cultural resources (p. 7-6), energy (p. 7-7), geology and soils (p. 7-7), greenhouse gas emissions (p. 7-7), hazards and hazardous materials (pp. 7-7 to 7-9), hydrology and water quality (p. 7-9), land use (pp. 7-9 to 7-10), noise and vibration (p. 7-10),

recreation (p. 7-11), tribal cultural resources (p. 7-11), utilities and service systems (pp. 7-11 to 7-12), or transportation and circulation (pp. 7-12 to 7-13).

The Cell Tower at Rio Americano High School

The Cell Tower at RAHS Project will install a new, unlit 90-foot-tall monopole wireless communications tower and supporting equipment, including a shelter and backup generator. The ground lease area for the tower will be approximately 1,500 square feet, with approximate dimensions of 60 feet by 26 feet. The tower will be installed at the back of the campus, adjacent to and to the west of the campus cafeteria and kitchen building.

The District approved the Cell Tower Project on June 10, 2025 (Resolution No. 4212). In doing so, the District determined that the project was exempt from further CEQA review pursuant to CEQA Guidelines, sections 15303 and 15314 (i.e., the "Class 3" and "Class 14" categorical exemptions, respectively). The statutory window to legally challenge this decision expired on December 7, 2025. (Pub. Resources Code, § 21167.) No timely lawsuits were filed, so the District's approval and exemption determination is conclusively presumed to be valid. (See Pub. Resources Code, §§ 21167.2, 21167.3.)

The Cell Tower Project is separate from and unrelated to the proposed Project. Nevertheless, the Draft EIR included it in its analysis of potential cumulative impacts. The Draft EIR concludes that the two projects will not produce cumulatively considerable impacts. Specifically, the Draft EIR determines that the Project's less-than-significant impacts do not make a cumulatively considerable contribution to the identified cumulative impacts described above. The Draft EIR describes assumptions regarding the Cell Tower Project and other cumulative developments, forecasts and projects how those assumptions pertain to the evaluation of each environmental topic area. The Draft EIR then bases its conclusion on each specific environmental topic being analyzed and whether the Project would make a considerable contribution to a significant impact that is otherwise related to the Cell Tower Project.

Commenters question the Draft EIR's conclusion based on the District's determination that the Cell Tower Project is categorically exempt from CEQA; no environmental review document was prepared because of its exemption determination, so the impacts commenters allege it will have were not documented. This reasoning, however, is precisely how categorical exemptions are supposed to function—CEQA does not require lead agencies to produce specified findings or documentation that a project will not have an environmental impact. Instead, a lead agency need only have substantial evidence in its record for the project that demonstrates the project qualifies for the invoked exemptions. (See CEQA Guidelines, § 15062 [providing no requirement to write down decision]; see also §§ 15060-15061 [same]; *CalBeach Advocates v. City of Solana Beach* (2002) 103 Cal.App.4th 529, 540 [holding no specified findings nor a public hearing required to support or make an exemption decision]; *Magan v. County of Kings* (2002) 105 Cal.App.4th 468, 475 [same].)

As noted above, the District concluded that the Cell Tower Project qualified for the "Class 3" categorical exemption, which applies to projects "consist[ing] of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications

are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel." (CEQA Guidelines, § 15303.) Published case law interpreting the Class 3 exemption has affirmed that cell towers qualify for the exemption, as a matter of law. (See *Don't Cell Our Parks v. City of San Diego* (2018) 21 Cal.App.5th 338, 359–360 [cell towers, although not listed as an example in section 15303, are "much smaller" than the provided examples of exempt structures]; see also *San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012 [upholding application of Class 3 exemption to hundreds of telecommunications equipment boxes]; *Robinson v. City and County of San Francisco* (2012) 208 Cal.App.4th 950 [same].) The District also concluded the Cell Tower Project qualifies for the Class 14 categorical exemption, which "consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less." (CEQA Guidelines, § 15314.) The Cell Tower Project meets this criteria because it is an addition to existing school grounds and does not increase RAHS's original student capacity whatsoever.

Taken together, the Draft EIR concludes that impacts from the proposed Project, coupled with the Cell Tower Project, will not be cumulatively considerable. Because commenters have not presented the District with any evidence to suggest otherwise, the Draft EIR's analysis and conclusion is practical and reasonable, as required by CEQA. (*City of Long Beach v. Los Angeles Unified School Dist.*, *supra*, 176 Cal.App.4th at p. 912.)

The District's Facilities Master Plan

Several commenters request that the Draft EIR analyze the cumulative impacts of all RAHS projects envisioned in the District's 2024 Facilities Master Plan (FMP). The District publishes information about the FMP on its website at: https://www.sanjuan.edu/our-district/construction-news/facilities-master-plan. As the webpage explains, the FMP is a long-term, districtwide planning tool designed to guide investments in District schools and support facilities. The District treats the FMP as a "living document" that is regularly updated as projects are completed, new needs emerge, or funding opportunities evolve. The FMP includes campus-by-campus facility assessments, site and building layout concepts, deferred maintenance needs, and a scoring rubric to prioritize projects equitably.

For RAHS, the District provides the school's existing site plan alongside a "vision site plan," which graphically displays all desired improvements based on the school site's needs. (See: https://resources.finalsite.net/images/v1729120494/sanjuanedu/jj9azctoypgpshex1ldq/RioAmericanoHS_CampusVisionPlans.pdf). These "needs and wants" were formulated through the District's outreach and engagement with school constituents. (See: https://launch.kahua.com/file/SEE3Fz1A3F8CBC). By virtue of this, the FMP for RAHS is aspirational and does not firmly commit the District or RAHS to a specific course of development; nor does it guarantee that all desired improvements will ultimately be constructed. (See *Bridges v. Mt. San Jacinto Community College Dist.* (2017) 14 Cal.App.5th 104, 118–122 [facility maser plan's proposal to develop potential future campus site was not a development plan requiring CEQA review; while a new bond measure had "opened up options," the college still had not decided "which of the many projects on its wish list it will fund with the bond proceeds"].) Instead, if and when the details of those projects materialize and they are formally proposed, the District will perform all

requisite CEQA review on a project-level basis. (See *Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1065 [no need to analyze projects listed in campus master plan, as they will comply with CEQA before each is approved at some point in the future].) Given this, the Draft EIR appropriately concluded that many of the desired improvements identified in the FMP's "vision plan" were too speculative or nebulous to warrant inclusion and further consideration in the cumulative impacts analysis contained in Section 7. (CEQA Guidelines, § 15130, subd. (a)(1)(A) [cumulative impacts analysis need only list the "past, present, and *probable* future projects producing related or cumulative impacts"]; *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1031–1032 [EIR need not consider a project "cumulative" if its "contours…remain a mystery"]; *City of Maywood v. Los Angeles Unified School Dist.*, *supra*, 208 Cal.App.4th at p. 397 ["where future development is unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences"].)

Jesuit High School

Several commenters state that the EIR should analyze the anticipated effects of overlapping events at Jesuit High School (which recently constructed new stadium lights), including potentially concurrent sports games as well as its decision to enroll female students beginning in 2027, as commenters allege this change will contribute to a larger student body population, which will in turn affect traffic, parking, and stadium usage. Commenters ask that the EIR consider whether and how these activities, combined with the proposed Project, will have cumulative effects on traffic, noise, lighting, wildlife, and users of the American River Parkway.

The Draft EIR analyzed the potential cumulative impacts that could arise during overlapping sporting or other school events concurrently held at RAHS and Jesuit High School. Given both schools' proximities to one another and the similarities of their stadium improvement projects, the District selected Jesuit's Stadium Lighting Project as one of the "related projects" to further analyze in the Draft EIR's cumulative impact analysis. (Draft EIR, p. 7-2, Table 7-1.) The Draft EIR details which impacts could be cumulatively considerable if Jesuit and RAHS host games at the same time. For instance, the Draft EIR explains that operational noise from the Proposed Project could combine with intermittent stadium noise at Jesuit's stadium. However, because Jesuit's stadium is located approximately 0.5 miles from RAHS, noises from either stadium would not combine at the same residential receptors given that levels attenuate at approximately 6 decibels for every doubling of distance. (Draft EIR, p. 7-10.) Similarly, the Draft EIR's LTA analyzed potential traffic impacts that might occur when football games are hosted concurrently at RAHS and Jesuit. (Draft EIR, pp. 7-12 to 7-13.) The LTA notes that vehicle queuing could occur during intermittent high-capacity events, which would typically occur outside of peak-travel demand hours. As such, the EIR commits the District to Mitigation Measures 4.4-3a through 4.4-3c, which requires the District to enter into a use agreement with Jesuit to manage off-site parking, circulation, motorists, pedestrians, and related traffic measures during high-attendance events. (Draft EIR, p. 7-13.) With implementation of these measures, the Project's less than significant traffic impacts would likewise not be cumulatively considerable when combined with operations from the Jesuit Stadium Lights project. (*Ibid.*)

Jesuit's decision to enroll female students for the 2027–2028 school year does not change the conclusions reached in the Draft EIR's cumulative impact analysis nor render it insufficient. Moreover, the Draft EIR did not need to analyze this decision as part of its cumulative impacts analysis for three key reasons.

First, Jesuit's decision to create a co-divisional education model with a new "Girls Division" does not constitute a "project" under CEQA that would merit consideration in the EIR's cumulative impact analysis. (Pub. Resources Code, § 21065; CEQA Guidelines, § 15378; *City of South Gate v. Los Angeles Unified School Dist.* (1986) 184 Cal.App.3d 1416, 1422–1427; *Prentiss v. Bd. of Education* (1980) 111 Cal.App.3d 847, 851–853.) Jesuit's change in enrollment demographics is a school-specific policy decision that was not made by the District and has no relationship to the proposed Project.

Second, even if the District were to treat it as a "project," Jesuit's decision to open enrollment to female students does not change the environmental setting's underlying baseline conditions. More specifically, some commenters contend that enrolling female students will exacerbate local traffic impacts due to more parking and stadium use. But Jesuit clarified that its decision to slowly introduce a co-divisional education model "builds upon Jesuit's decades-long history of welcoming young women to campus through performing arts, summer programs, athletics, and other activities." (See https://www.abc10.com/article/news/local/fair-oaks-carmichael/jesuit-high-school-faces-lawsuit-after-announcing-plan-admit-girls-in-2027/103-cb233d93-13f9-440b-8b2c-ea34f496642e.) So, female student athletes and visitors were already part of the existing baseline analyzed in the EIR and therefore would not be separately considered as part of the cumulative analysis. To this end, issues like parking and stadium usage are not "impacts" under CEQA and would not be subject to environmental review.

Third, Jesuit's decision is currently subject to ongoing litigation. (See *Men for Others v. Alling, Jesuit High School of Sacramento Bd. of Trustees, Jesuit High School of Sacramento, et al.* (Jul. 17, 2026) Sacramento County Super. Ct., Case No. 26CV017288.) The lawsuit, filed on July 17, 2026, seeks to enjoin and void Jesuit's decision. Therefore, until the suit is resolved or decided, the school's co-divisional framework remains subject to change, which presents a level of uncertainty that the District cannot and should not try to predict or analyze. (See *Environmental Protection Information Center v. Cal. Dept. of Forestry and Fire Protection* (2008) 44 Cal.4th 459, 503 [where future actions are "unspecified and uncertain, no purpose can be served by requiring an EIR to engage in sheer speculation as to future environmental consequences"].)

For these reasons, the Draft EIR's cumulative impacts analysis was not required to analyze Jesuit's decision to change to a co-divisional educational model. (CEQA Guidelines, §§ 15130, 15125.)

The U.S. Army Corps of Engineers' American River Common Features Flood Risk Management Project – Erosion Contract 3B

Several commenters contend that the Draft EIR's cumulative impacts analysis should have considered the U.S. Army Corps of Engineers' American River Common Features ("ARCF") Flood Risk Management Project – Erosion Contract 3B (hereinafter, "ARCF Contract 3B Project").

The ARCF Contract 3B Project is part of the Army Corps' larger flood risk management effort to address flood protection measures along the Sacramento River, Natomas East Main Drainage Canal, Arcade Creek, Magpie Creek, Sacramento Weir and Bypass, and Lower American River. Contract 3B—which includes Contracts 3B North and South—is one of several contracts that authorizes the Corps to design and implement erosion protection and levee improvements for flood-risk reduction. Specifically, Contract 3B North would construct approximately 1.8 miles of launchable rock toe, trench, and bank protection, while Contract 3B South would construct approximately 1.5 miles of launchable rock toe, trench, bank protection and tie backs along the Lower American and Sacramento Rivers.

The ARCF Project first received federal congressional authorization and funding in 1996. The Corps completed the ARCF General Reevaluation Report and accompanying EIS/EIR in 2016. Following congressional approval of the formalized ARCF Project in 2016, the Corps began individually designing erosion protection and levee improvement projects for various segments of the Sacramento and American Rivers. The Corps refined these smaller designs in the draft Supplemental EIS/Subsequent EIR in 2023, and later in 2025 in the final SEIS/SEIR. The Corps issued its record of decision approving Contract 3B and adopting the 2025 final SEIS/SEIR on June 18, 2025.

On August 21, 2025, Plaintiffs American River Trees, Save the American River Association, and Center for Biological Diversity filed a federal lawsuit challenging the Corps' decision. (*American River Trees, et al. v. Central Valley Protection Bd., et al.* (Aug. 21, 2026), E.D. Cal., Case No. 2:25-cv-02384-DC-CSK.) On November 20, 2025, the District Court for the Eastern District of California granted Plaintiffs' motion for a preliminary injunction to enjoin the Corps from engaging in any ground or vegetation disturbing activities, including site preparation, vegetation removal, and tree felling in the Contract 3B area to preserve the status quo before the court reaches a decision on the merits.

When the District published its NOP of an EIR for the proposed Project on January 5, 2026, this litigation remained active and ongoing. By the time the District prepared and circulated the Draft EIR, the parties to the above lawsuit were engaged in active briefing on the merits. The Corps filed a Status Report with the Court on September 30, 2026. Otherwise, the District Court has not yet issued a decision on the merits of Plaintiffs' claims, nor has it lifted the November 2025 injunction it issued against all Contract 3B activities.

Given this procedural posture and the ongoing injunction against Contract 3B, it remains to be seen whether, when, or if the Corps will ever implement the project as proposed. Because of this uncertainty, there is no way for the District to know or ascertain when Contract 3B will be constructed and if it will coincide with construction and operation of the proposed Project. Moreover, given the nature of the lawsuit and the claims raised therein, it is also unknown whether the iteration of Contract 3B that the Corps approved in 2025 will proceed as-is or if it will be modified. Taken together, the ongoing litigation and temporary injunction against Contract 3B renders the project too speculative and uncertain to consider as part of the cumulative impacts analysis. The Draft EIR, therefore, was not required to analyze in its cumulative impacts analysis because CEQA "does not require a lead agency to speculate. It requires a lead agency to describe settings and impacts in the light of what is reasonably feasible and with a good faith effort at full disclosure." (*League to Save Lake Tahoe Mountain, etc.*, *supra*, 75 Cal.App.5th at p.

151.) Because commenters have not presented the District with any evidence that establishes or even suggests Contract 3B is a "probable future project," the District appropriately concluded that Contract 3B "was too speculative to warrant cumulative impacts analysis" because it would force the District to "engage in sheer speculation as to future environmental consequences." (*City of Maywood v. Los Angeles Unified School Dist.*, *supra*, 208 Cal.App.4th at pp. 397–398.)

Nevertheless, even if the District needed to consider the ARCF Contract 3B project as part of its cumulative baseline, substantial evidence establishes that the Project would not contribute to cumulatively considerable impacts. Many commenters expressed concerns about the proximity of the Contract 3B staging area to the Project Site, and the potential for overlapping construction vehicle schedules. More specifically, commenters wondered whether construction vehicles traveling to and from the proposed Project Site would overlap with construction vehicles traveling to and from the Contract 3B staging area. The ARCF Contract 3B Comprehensive SEIS/SEIR shows that this would not occur.

Specifically, Figure 3.5.2-7 of the SEIS/SEIR shows the North Site 4-2 staging area for Contract 3B construction activities. (See SEIS/SEIR, p. 3-34.) Figure 3.5.2-7 also shows that the access route to that staging area would be via the levee crown maintenance road, not American River Drive, which is what the proposed Project's construction vehicles will use. (SEIS/SEIR, p. 3-34; Draft EIR, pp. 4.1-5, 4.4-8, 4.4-11, 4.4-17, 5.3-12, 7-12 to 7-13.) The nearest access to the levee crown maintenance road would be along the vacant lot adjacent to the Sacramento County Recorder's and Assessor's Office, approximately 1.25 miles east of the RAHS campus. (See *ibid.*) Thus, the Corps and/or its construction contractors would not be driving trucks on American River Drive near or past RAHS, nor would they be accessing side streets to drive onto the levee. (See SEIS/SEIR, Ch. 3, "Description of Project Alternatives"].) Because the Project will not have any vehicular impacts to the Parkway, it also will not cumulatively contribute to any of the perceived traffic impacts generated by the Corps' construction vehicles. Finally, the proposed Project's anticipated window of construction schedule and activities is short and limited that there likely will not be any overlap with Contract 3B's proposed construction schedule. Nevertheless, and in the unlikely event this occurs, the proposed Project's construction activities will not have any impacts to the Parkway, so they necessarily will not cumulatively contribute to any of the vehicular construction generated by the Contract 3B project. For these reasons, the Draft EIR's cumulative traffic analysis appropriately does not consider, nor does it need to consider, traffic from the ARCF Contract 3B Project on American River Drive. Accordingly, no further changes to the Draft EIR are required.

MASTER RESPONSE 10: ACCURATE, STABLE, AND FINITE PROJECT DESCRIPTION

This Master Response explains and clarifies the stability of the Project Description and how it appropriately evaluated existing and future Project scenarios based on best available information pertaining to anticipated use of the stadium improvements and athletic field. This Master Response also provides clarification on elements of the Project Description that were raised in comments on the Draft EIR and, to the extent necessary, identifies revisions to the Project as reflected in the Errata in Chapter 3 of this Final EIR. This response is not intended to address or analyze the environmental effects of those revisions.

Chapter 3, *Project Description*, of the Draft EIR provides a detailed description of the Project (pp. 3-1 to 3-12). The chapter includes maps and graphic presentations of the Project Site and existing setting (pp. 3-1 to 3-4), along with extensive narrative descriptions about the Project's background and need, proposed land uses and components, and anticipated construction activities and operational characteristics (pp. 3-4 to 3-10). Finally, the chapter identifies six project objectives that describe the Project's underlying purpose and identify reasonable goals (p. 3-10), along with impact avoidance and minimization measures (pp. 3-10 to 3-11), and regulatory permit requirements and approvals (pp. 3-11 to 3-12). The level of detail was designed to provide agencies, members of the public, and decisionmakers with sufficient information about the Project so that they can understand the full scope of its physical and operational characteristics, and make an intelligent evaluation of the nature and magnitude of its potential impacts. (CEQA Guidelines, § 15124; see *id.* at § 15146 ["The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR"]; see also *Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1052–1055.)

As outlined in Section 3.1.2, the Project was developed because RAHS currently lacks adequate sports lighting and sufficient stadium capacity. As a result, athletic practices and games must be held during daytime hours, while some evening events can be hosted with the use of portable, diesel-powered lights. Otherwise, the limited capacity has forced RAHS to host touchstone school events, such as home football games and graduation ceremonies, at offsite locations elsewhere, which, in turn, requires students and their families to travel farther distances to attend them. (Draft EIR, pp. 3-1, 3-6.) Section 3.2 outlines how the Project would address these issues by improving the existing RAHS athletic facilities with new high-mast light standards, new and expanded bleachers, an upgraded public address system, a new press box, and new pedestrian pathway lighting. (Draft EIR, p. 3-4.) The new high-mast lights will be designed with the latest LED light fixture technology that achieves maximum cut-off and light control to reduce spillage and glare, and satisfies the strict guidelines set by the International Dark-Sky Association ("IDA").

As detailed more fully below, the Draft EIR contains all important project description parameters required by CEQA that are necessary to understand whether the Project will have a substantial adverse change to the physical environment. The Project Description outlined in Chapter 3 of the Draft EIR, along with the supporting analyses, is clear, accurate, and stable. To the extent there have been minor changes made to the Project Description between the Draft EIR and this Final EIR those changes are reflected in the Final EIR's Errata. Moreover, those minor variations do not render the Project Description unstable. The Project Site remains the same, as do the types of proposed land uses, construction improvements, infrastructure, footprint, and operations. For these reasons, the Project Description remains stable and meaningful public input and informed decision-making can be well supported by the Final EIR.

Environmental Setting and Project Site Boundaries

Some commenters contend the Draft EIR misdescribes the Project's setting and existing environment and seek clarification as to why the Draft EIR does not treat the adjacent north bank American River levee as "part of" the American River Parkway. In considering the environmental setting and the Project Site's proximity to the American River Parkway, the Draft EIR explains that the RAHS campus and stadium

where Project improvements will occur are "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." (Draft EIR, pp. 3-4, 4.1-7; see also Draft EIR, pp. 4.1-17, 4.1-18, 4.2-1, 4.2-2, 7-2, 7-5, 7-15.) The Draft EIR explains that the levee "is elevated approximately 10 feet *above* the Parkway." (Draft EIR, p. 6-14, emph. added.) As such, the Draft EIR further clarifies that the "levee crown" is likewise "technically not part of the Parkway." (Draft EIR, p. 4.1-8, 4.5-1, 7-6.)

Nevertheless, several commenters dispute this characterization and maintain that the levee is "part of the Parkway." As the Draft EIR explains, however, "[t]he American River Parkway is a [Sacramento] County regional park." (Draft EIR, p. 5.2-2.) The intervening levees, on the other hand, are under the federal jurisdiction of the U.S. Army Corps of Engineers.[2] (See Draft EIR, pp. 3-4, 5-9.29, 6-5.) So, the Corps' levees are not "part of the Parkway" because they are not under the oversight and jurisdiction of the County. The American River Parkway Plan impliedly recognizes this. ARPP Policy 7.23, for example, notes that levees are "man-made…buffers" that are "used to separate, buffer, or screen the Parkway visually from adjoining land uses…" (Draft EIR, p. 4.2-14; see ARPP, p. 31.) Here, the Corps' manmade north bank levee separates the RAHS campus and Project Site from the Parkway's Rio Americano Subarea. (Draft EIR, p. 4.2-13.) Therefore, the levees fall outside the jurisdictional boundary of the Parkway. Given this, the Draft EIR appropriately concluded that, for purposes of assessing and delineating the Project's environmental setting, RAHS campus is "separated from" the Parkway because the levee is not "part of" the Parkway. (See CEQA Guidelines, §§ 15125 15126.2, subd. (a); see also *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 474 ["identifying the effects on the project and its users of locating the project in a particular environmental setting is neither consistent with CEQA's legislative purpose nor required by the CEQA statutes"].) The Draft EIR appropriately focuses on potentially significant adverse physical environmental effects of the Project, while also identifying all potential conflicts with applicable plans, policies, and regulations adopted with the intent of reducing or avoiding environmental impacts. The presence of the levee vis-à-vis the Parkway is an aspect of the environmental analysis presented in the Draft EIR—the levee separates the existing development (such as the existing school and existing residential development surrounding the school) from the recreational and natural portions of the Parkway, which is relevant to, and a fact incorporated into the biological resources evaluation (see Draft EIR, pages 4.2-1 through 4.2-27). The raised levee area blocks views of the campus from recreational areas within the Parkway, a fact that is incorporated into the aesthetics analysis (see Draft EIR, pages 4.1-1 through 4.1-26 and 7-2 through 7-3). Relative to potential conflicts with the American River Parkway Plan, analysis presented in the Draft EIR is focused on the substance of the policies (Draft EIR, pages 4.1-8, 4.1-9, 4.1-14, 4.1-18, 4.2-12 through 4.2-13, and 5.9-30).

Proposed Project Operations Plan and Schedule of Uses

[2] While the U.S. Army Corps of Engineers retains jurisdictional control over the levees, the California Reclamation Board maintains an agreement with the Federal Government that grants the Board with the responsibility of operating and maintaining the levees and related flood control facilities. The Reclamation Board is an independent State Agency, within which Reclamation District 1000 is the local maintenance district that possesses jurisdiction over the north right bank levee of the American River. (See ARPP, pp. 86, 87, 217, 220.)

Sections 3.2.2 and 3.2.3 of the Draft EIR describe the Project's proposed operations plan and schedule of uses. (Draft EIR, pp. 3-6 to 3-8.) The Draft EIR explains that the District would employ Night Event Management Standards that would be used in conjunction with RAHS's existing standard operations, policies, and procedures, which are governed by the school's Safety Team, Athletic Department, and the California Interscholastic Federation ("CIF"), including the Sac-Joaquin Section of which RAHS is a member. CIF, specifically, promulgates Game Management Guidelines that contain procedures visiting schools must adhere to, including expectations surrounding conduct, event volunteer duties, management of on- and off-site parking, and sound system operation. (Draft EIR, p. 3-6.) The CIF Sac-Joaquin Section's Constitution memorializes these guidelines and sets forth rules governing conduct, game play, eligibility, and scheduling.[3] (Available online at: SJSFullConstitution2627.)

Comments on the Draft EIR expressed concerns about the accuracy of the Project Description's summary of how many visitors may attend certain events. Table 3-1 of the Project Description outlines the anticipated number of attendees various sporting and school events. Some commenters note a numerical discrepancy between the anticipated number of graduation guests between the body of the Project Description and the figures displayed in Table 3-1. More specifically, page 3-8 of the Draft EIR states: "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." Based on these figures, commenters note that these estimates total approximately 1,400 anticipated attendees at graduation. Table 3-1, though, identifies the "average estimated attendance per event" for graduation to be approximately 3,500 attendees. While graduation was originally considered in the development of the proposed project operating scenario to accommodate 3,500 attendees, further discussion and reflection upon available bleacher and field seating resulted in a slight refinement of this maximum event capacity to 3,400; this aligns with the maximum football game attendance scenario and the basis of analysis applied throughout the Draft EIR, including for Transportation, as well as the is within the capacity of the fire and life-safety requirements for design review and approval by DSA. Master Response 10 confirms that 3,400 attendees is the intended estimate and identifies a corresponding to Mitigation Measure 4.4-3c to implement this limit, as also reflected in Chapter 3, "Errata," to this Final EIR. The Draft EIR analyzed all potential impacts based on the 3,400 attendee-figure for the purposes of consideration of peak-attendance events, such as graduation, as applicable; therefore, the EIR's analyses and significance determinations remain unchanged and no further revisions are needed apart from the aforementioned minor corrective typographical changes, which are reflected in the Errata contained in Chapter 3 of this Final EIR. (See *Mount Shasta Bioregional Ecology Center v. County of Siskiyou* (2012) 210 Cal.Ap.4th 184, 226 [understating certain figures and estimates in Draft EIR did not preclude informed decision-making or public participation because the actual increased estimates did not produce or reveal a new significant environmental impact].)

3 Available online at: https://cifsjs1-my.sharepoint.com/personal/wdeboard_cifsjs_org/_layouts/15/onedrive.aspx?id=%2Fpersonal%2Fwdeboard%5Fcifsjs%5Forg%2FDocuments%2FWebsite%2FBylaws%2F2026%2D27%2FSJSFullConstitution2627%2Epdf&parent=%2Fpersonal%2Fwdeboard%5Fcifsjs%5Forg%2FDocuments%2FWebsite%2FBylaws%2F2026%2D27&ga=1(hereinafter, "CIF SJS Constitution").

Commenters also expressed concerns about the Project Description's stableness when referring to anticipated events' precise hours of operation. For instance, many commenters question the Project Description's reference to events starting and ending "generally" around certain times (see Draft EIR, p. 3-7), and instead ask for more precision, such as exact end times and/or mandatory curfews. Such fine level of detail, however, is not required by CEQA. Rather, the level of detail about the Project that the Draft EIR provides satisfies CEQA's requisite standards. Specifically, CEQA requires that the EIR include "a *general description* of the project's technical, economic, and environmental characteristics, considering the principal engineering proposals if any and supporting public facilities." (CEQA Guidelines, § 15124, subd. (c), emph. added.) While this description must be "accurate, stable, and finite," it "should not supply extensive detail beyond that needed for evaluation and review of the environmental impact." (*Ibid.*; CEQA Guidelines, § 15146.) Instead, a "general description" of a project's technical characteristics can mean "involving only the main features of something rather than details or particulars." (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 28.) This requirement is "consistent with other CEQA mandates to make the EIR a user-friendly document" and "fosters the principle that EIRs should be prepared early enough in the planning stages of a project to enable environmental concerns to influence the project's design." (*Ibid.*) In other words, a "general description of a project element can be provided earlier in the process than a detailed engineering plan and is more amenable to modification to reflect environmental concerns." (*Ibid.*) For these reasons, the "degree of specificity required depends on the type of project. There must be sufficient information to understand the environmental impacts of the proposed project[,] [and] [t]he EIR must achieve a balance between technical accuracy and public understanding." (*Ibid.*; CEQA Guidelines, § 15146; *id.*, § 15003, subd. (i) ["CEQA does not require technical perfect in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure"].)

Here, the District cannot predict with finite specificity the time when future, unknown sporting events will end. Given this inherent uncertainty and the unpredictable nature of sports games, it would not be reasonable for the District to impose a mandatory curfew. For instance, some games may take longer than others if they go into overtime, as is occasionally necessary to break a tie between the two teams. (Draft EIR, p. 3-7.) Alternatively, the school may need to adjust the hours during which certain outdoor practices are held if necessary on high-heat days. (Draft EIR, p. 3-7.) To this end, if the football team makes the playoffs, then the number of home games might be more than prior years. For the same reason, the District cannot predict the exact number of games that will be held for each sport for every year moving forward. As the Draft EIR explains, the District does not have full control over its athletic competition schedule and does not dictate which games will be played at home or away, as this is coordinated amongst all league schools for multiple sports utilizing the same facilities. (See Draft EIR, p. 3-7.) Rather, CIF oversees all scheduling, which is inherently subject to change based on various extraneous factors. (See Draft EIR, p. 3-7; see CIF SJS Constitution, Bylaws 504, 504.3, 700, and Article 22 [Football].) Nevertheless, the Draft EIR still commits the District to restricting the times during which the stadium as used, to the greatest extent feasible. Mitigation Measure 4.3-1b provides that "[e]vening 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." (MM 4.3-1b, italics added; Draft EIR, p. 1-12.) But "[i]f 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." (*Ibid.*, italics added.) For these reasons, the Project Description appropriately relies on data from existing baseline conditions to predict and anticipate the number and hours of certain games for specified sports in order to inform its analysis of any related environmental impacts and impose corresponding mitigation. (*Ibid*.) This is entirely acceptable under CEQA. (See *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 658 ["the baseline environmental setting must be premised on realized physical conditions on the ground, as opposed to merely hypothetical conditions allowable[;]" so, "established levels of a particular use have been considered to be part of an existing environmental setting" because "[e]nvironmental conditions may vary from year to year"].)

Finally, several commenters sought clarification about the specific types of assemblies and community events that the Project will facilitate as a "Center of Community." Education Code, section 38131, requires every public school facility and grounds in California to have a "civic center" for community use. Section 38131 also outlines the purposes for which school districts may grant access to such centers. Accordingly, the District's Board of Directors approved the "Use of School Facilities Handbook" (and later revised in 2023), which outlines the process for community use of school facilities. Among other facilities, the Handbook includes the existing Raider Stadium and will include the iteration of the stadium that will exist once implemented via the Project. The Handbook provides that usage of the stadium must proceed under a structured permit, fee, and eligibility system that mirrors the list of authorized purposes outlined in Section 38131. While RAHS and other District campuses do not have a history of frequent community use, the Draft EIR nevertheless uses reasonable and conservative assumptions for its analyses. For example, the underlying vehicular activity used in the air quality analysis assumes eight new home football games per year (the actual level of activity would be between five to eight games per year), four school assemblies, one graduation, and four new potential school-sanctioned community events, which were assumed to be peak-attendance events.

Chapter 3, *Project Description*, of the Draft EIR defines the Project components and the range of existing and future activities accommodated on-site (i.e., number of attendees that may attend various events) that would occur with implementation of the Project. The Draft EIR thus appropriately evaluates multiple scenarios that represent the range of activities that would be accommodated by implementation of the Project. The Draft EIR also provides a detailed accounting of the existing conditions at Raider Stadium, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares these existing conditions to what would occur under the Project. For these foregoing reasons, the Project Description and environmental setting in the Draft EIR are sufficient to apprise the public of the Project's proposed uses and potential impacts, as required by CEQA.

Consideration of 2010 Rio Americano High School Outdoor Sports Facility Upgrades Project

Several commenters contend that the Draft EIR's Project Description fails to fully discuss or compare this Project to the District's previously proposed Rio Americano High School Outdoor Sports Facility Upgrades Project (SCH#2005072119). As commenters correctly note, the District approved that project and certified the related EIR in 2010. However, the District ultimately never constructed it. Given this,

that project's approvals and environmental analyses are no longer directly relevant or applicable here. Instead, and because 16 years have elapsed since the District first proposed that project, the District now proposes the underlying Project to address the changed and current needs of RAHS. In doing so, the District has commissioned the preparation of this Draft EIR to accurately reflect the development setting and the changed conditions that have likely occurred during those intervening decades. Reliance on the 2010 EIR, on the other hand, would produce inaccurate results based on outdated data for an entirely different project. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 994–995 [where city council did not take action on prior project nor did it formally incorporate that environmental review into new project EIR, it was not "manifestly unreasonable" for city to decline to revisit previously rejected alternatives].) This would be antithetical to CEQA's directive that "[t]he defined project and not some different project must be the EIR's bona fide subject. The CEQA reporting process is not designed to freeze the ultimate proposal in the precise mold of the initial project; indeed, new and unforeseen insights may emerge during investigation, evoking revision of the original proposal." (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199–200.) Nevertheless, because the District had the benefit of the analyses prepared in the prior EIR, to the extent they remain factually relevant, the District may rely on those analyses to better inform or guide how it conducts its analyses here. (See C*alifornia Native Plant Society v. Santa Cruz*, *supra*, 177 Cal.App.4th at pp. 994–995; *California Oak Foundation v. Regents of University of California* (2010) 188 Cal.App.4th 227, 270–271.)

Moreover, incorporating a detailed comparison of the 2010 EIR into this environmental document would create unnecessary confusion and not produce any meaningful insights or change this EIR's significance determinations. Including this level of detail would also contravene CEQA's policy that lead agencies should reduce delay and paperwork by "[e]mphasizing the portions of the environmental impact report that are useful to decision-makers and the public and *reducing emphasis on background material*." (CEQA Guidelines, § 15006, subd. (s), emph. added.) Finally, commenters have not provided substantial evidence that the Draft EIR's failure to provide line-by-line comparisons of the Project against that contemplated in the 2010 EIR is crucial to their review of this Project's environmental effects or how that missing analysis impacts public participation and informed decision-making. (See *South of Market Community Action Network v. City and County of San Francisco* (2019) 33 Cal.App.5th 321, 332–335.)

Other School District Projects

Several commenters contend that other District projects or improvements on the RAHS campus are somehow related to or constitute a "foreseeable expansion" of the Project. As explained in Master Response 9: Cumulative Impacts and Related Projects, the Draft EIR considered the Project's potential cumulative impacts based on other reasonably probable school projects unrelated to the one proposed here, such as the approved Cell Tower Project at RAHS and the proposed modernization of the nearby Ralph Richardson Center. As Master Response 9 explains, those projects are entirely separate from and unrelated to the Project, so they were appropriately considered only as part of the cumulative setting and analysis.

Master Response 9 also explains why CEQA does not obligate or require the District to analyze conceptual projects that were identified in the District's Facilities Master Plan (FMP). As a flexible long-

term planning document, many of the projects and improvements identified in the Plan are aspirational as opposed to definitive commitments. One of those, for instance, is relocating the tennis courts. Some commenters suggest that any future relocation of the tennis courts would be a reasonably foreseeable expansion of the Project's improvements. But as Master Response 9 explains, the District has not formulated, conceptualized, or even taken steps towards any relocation efforts. Plus, if and when that does occur, any such decision will be subject to CEQA. (See *California Oak Foundation v. Regents of University of California*, *supra*, 188 Cal.App.4th at pp. 271–272.) Because this Project does not propose relocating the tennis courts or any of the other long-term aspirational plans in the FMP, the EIR need not discuss them in the Project Description or speculate about their potential for occurring. (CEQA Guidelines, § 15145.) Finally, some commenters question the funding that would support future FMP projects and how it implicates the planning and construction of this Project. These types of economic concerns, however, are not considered "environmental impacts" under CEQA and therefore need not be analyzed or described as part of the baseline or cumulative setting.

Project Necessity and Social/Economic Implications

Several commenters raise issues that relate to the Project's perceived impacts to social or economic conditions, including community consequences or benefits, rather than the environmental analyses or associated impacts and mitigation measures raised in the Draft EIR. Such topics that were raised in comments: induced access to the American River Parkway and whether event attendees would unlawfully enter or trespass into it at night after hours; the potential for cyclists commuting home within the Parkway at night perceiving light emitted from the Project's stadium lights; whether the District would construct additional permanent public restrooms; the capital and funding that will be expended to construct the Project's proposed improvements and implement its proposed operations versus how much would be spent to maintain existing conditions as-is; suggestions to implement an entirely different project, such as an environmental learning center; the potential decrease in property values to homes in the surrounding neighborhood; and the implications for street parking and availability.

CEQA Guidelines, section 15131, provides that the "social effects of a project *shall not* be treated as significant effects on the environment." (CEQA Guidelines, § 15131, subd. (a), italics added.) CEQA Guidelines, section 15384, further reiterates that "evidence of social or economic impacts which do not contribute to or are not caused by physical impacts on the environment does not constitute substantial evidence" of a potentially significant impact for purposes of CEQA. (CEQA Guidelines, § 15384, subd. (a); see Pub. Resources Code, section 21082.2, subds. (b), (c).) In interpreting these directives, courts have clarified that "we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general." (*Santa Monica Chamber of Commerce v. City of Santa Monica* (2002) 101 Cal.App.4th 786, 799.) The reason for this is because "all government activity has some direct or indirect adverse effect on some persons. The issue is not whether the project will adversely affect particular persons but whether the project will adversely affect the environment of persons in general." (*Ibid.*, quoting *Topanga Beach Renters Assn. v. Department of General Services* (1976) 58 Cal.App.3d 188.)

With this framework in mind, the Draft EIR appropriately did not (and does not need to) analyze the economic and social effects of the Project; instead, the purpose of the Draft EIR is to fully analyze and mitigate the Project's potentially significant physical impacts to the environment to the extent feasible. The District's review of both environmental issues and the Project's merits is important when the Board ultimately makes a decision on what action to take on the Project, and both are considered in that decision-making process. However, the District is only required by CEQA to respond to comments regarding significant environmental issues. (CEQA Guidelines, § 15204.) Absent substantial evidence of them producing environmental impacts, each of the topics summarized above relate only to perceived potential social and economic effects, and therefore need not be further analyzed in the Draft or Final EIR. (See, e.g., *Porterville Citizens for Responsible Hillside Development v. City of Porterville* (2007) 157 Cal.App.4th 885, 903 [project's perceived impacts to property values is an economic concern, not an environmental concern recognized under CEQA]; *Save Our Access etc. v. Watershed Conservation Authority* (2021) 68 Cal.App.5th 8, 24–25 [social inconvenience of having to hunt for scarce street parking is not an environmental impact]; *National Parks and Conservation Association v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1359–1361 [rejecting claim that a visitor use and perception study was required to ascertain lighting impacts to visitors of a national park situated next to proposed landfill]; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 584–587 [crowd safety of downtown patrons near proposed basketball arena is not an environmental impact that must be analyzed in EIR]; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 376–377 [no evidence that concerns about the user safety of proposed playground equipment would result in significant environmental impacts]; *City of South Gate v. Los Angeles Unified School Dist.* (1986) 184 Cal.App.3d 1416, 1423–1427 [public controversy unrelated to an environmental issue is not governed by CEQA].)

Refinements to Project Description

Between the publication of the Draft EIR and drafting of this Final EIR, as proposed project design has progressed, some minor refinements have been identified by the design team for the purposes of increased safety measures and compliance with the Division of the State Architect's requirements.

These refinements include: updated location and extent of the egress lighting to provide 12 total light poles from the Stadium exit to the northern exit of the parking lot at American River Drive; additional gates to accommodate increased flow of pedestrian egress out of Raider Stadium; and additional egress lighting at these gateways. Minor additional trenching and related hardscape disturbance would be required for a total of 3,200 square feet of trenching along the pedestrian access pathway and egress lighting areas, as well as an increase in disturbed areas around the stadium to 10,450 square feet of hardscape and 12,725 square feet of softscape.

The District has reviewed these refinements in the context of the Draft EIR's analysis and determined that they would not substantively change the impact analyses and significance determinations made therein. The area of disturbance is limited to the existing paved parking areas and the Stadium and adjacent egress areas, consistent with the Draft EIR, do not extend the duration of construction or require equipment that would result in significant air quality impacts or increased noise levels compared to those evaluated in the

Draft EIR. Instead, these additional improvements support safety and emergency response features. Minor edits to the Draft EIR's Project Description are required to reflect these design refinements, as shown below and in Chapter 3, "Errata" to this Final EIR. Otherwise, because these changes are not substantial and do not present significant new information, recirculation is not required. (See *Beverly Hills Unified School Dist. v. Los Angeles Metro. Transp. Auth.* (2015) 241 Cal.App.4th 627, 664–666 [no recirculation required for EIR addendum describing revised construction schedule that did not cause new significant air quality impacts]; *Planning & Conservation League v. Dept. of Water Resources* (2004) 98 Cal.App.5th 726, 765–766 ["New information that clarifies or amplifies the previously circulated draft EIR does not require recirculation"].)

Conclusion

In sum, the Draft EIR provides an accurate, stable, and finite description of the Project that provides the public and decisionmakers with sufficient information about its proposed uses, environmental setting, objectives, and requisite permits. The Draft EIR evaluates the whole of the Project based on reasonably foreseeable physical development and maximum intensity of use that is anticipated and feasible under existing and proposed circumstances. Any minor variations in the Project Description that have occurred between the Draft EIR and Final EIR do not render it unstable. The Project Site remains the same, as do the types of Project land uses, proposed improvements to be constructed, any potential impacts, and anticipated operational characteristics. For these reasons, the Project Description remains stable and meaningful public input and informed decision-making are well supported by the Final EIR.

2.2.2 AGENCY

COMMENT LETTER A1, CALIFORNIA DEPARTMENT OF TRANSPORTATION DISTRICT 3, SEPTEMBER 8. 2026

Response to Comment Letter A1, California Department of Transportation District 3

Comment A1-1 Response: The District appreciates Caltrans' review of the Draft EIR and letter noting that the agency has no comments. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER A2, SACRAMENTO DEPARTMENT OF TRANSPORTATION, OCTOBER 15. 2026

Response to Comment Letter A2, Sacramento Department of Transportation

Comment A2-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted and the District thanks the commenter for their input.

Comment A2-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted and the District thanks the commenter for their input.

Comment A2-3 Response: The comment notes concurrence with proposed traffic management, as would be implemented through Mitigation Measures 4.4-3b and 4.4-3c), specifically requesting that traffic management at American River Drive and Saverien Drive intersection include, at a minimum, crossing guards and law enforcement to direct traffic intersection during a "conservative event." These actions are generally consistent with proposed mitigation, except that the specific authority to direct traffic during a "conservative" (or peak attendance) event shall be determined through the design of the Traffic Management Plan.

Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (Section 4.4, "Transportation and Circulation," pages 4.4-15 and 4.4-16) would require the District to implement an Event Transportation Management Plan prepared by a qualified transportation professional that would include specific actions to address traffic, pedestrian, and bicycle safety hazards, including during the higher attendance nighttime sports events. For example, Mitigation Measure 4.4-3b requires the District to provide advance information to potential attendees regarding available parking, designated pedestrian routes, and applicable parking restrictions; provide signage for on-site and off-site event parking; provide event staff and directional signs at campus access points and parking areas; implement appropriate safety treatments identified in the Localized Traffic Analysis at roadway crossings that attendees would use; and 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. This type of plan, which contains specific performance standards and provisions for monitoring and refinement, is routinely used and considered an acceptable way to reduce transportation impacts under CEQA. (See Mission Bay Alliance v. Office of Community Investment & Infrastructure (2016) 6 Cal.App.5th 160, 179–184, 188–190; City of Hayward v. Trustees of Cal. State University (2015) 242 Cal.App.4th 833, 854 [upholding adaptive transportation management program that allowed agency to monitor and adapt program measures based on future monitoring].) Minor revisions are made to Mitigation Measures 4.4-3b and 4.4-3c to clarify implementation procedures, have clear performance standards, and limit event attendance associated with proposed stadium improvements to 3,400; these revisions are shown in Chapter 3, "Errata," to this Final EIR.

Comment A2-4 Response: Comment noted. The LTA identified median modification (LTA p. 13, I2) so the County could add westbound left-turn storage if and when the County

determines that this improvement would be appropriate, at the County's discretion. The proposed project does not include the modification. If the County pursues this improvement, the District will coordinate with the County, and in the meantime, event queues are managed through County-coordinated event signal timing under revised MM 4.4-3c, as presented in Chapter 3, "Errata," to this Final EIR. As detailed in the Draft EIR (pages 4.4-16 and 4.4-17), 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. 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 Measure 4.4-3a would reduce the potential for queuing since some attendees would instead turn into Jesuit High School before reaching this intersection to make use of overflow parking to be provided at Jesuit for a peak-attendance event. 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. The operational impact related to event parking, bicycle and pedestrian safety, vehicle circulation, and queuing was determined to be less than significant. In order to further ensure that traffic and circulation conditions as a result of the proposed project would not be greater than as evaluated under this EIR, the District has modified Mitigation Measure 4.4-3c to include a maximum event attendance of 3,400, as shown in Chapter 3, "Errata," to this Final EIR.

Comment A2-5 Response: The LTA notes that vehicle queuing could occur during intermittent high-capacity events, which would typically occur outside of peak-travel demand hours. The 5:30-6:30 PM period used for modeling is conservative. School dismissal traffic ends by about 4:00 PM, as the commenter's drone data shows. Observed game arrivals occurred from 6:30 to 7:45 PM (LTA Attachment D), when background traffic is lower. And the LTA loads 100 percent of arrivals into the single analysis hour. Combining game traffic with the 3:00-4:00 PM school peak would model a condition that does not occur. The Draft EIR Project Description provide Table 3-1 and a written summary of the existing and anticipated new events that would occur, including frequency and estimated attendance ranges. As noted, due to inadequate sports lighting and capacity, Rio Americano is currently unable to host home football games and graduation ceremonies, which represent the anticipated highest attendance events. While the commenter notes concerns around vehicle queues and delays during school dropoff and pickups, such are existing conditions and not affected by the proposed project. The primary events that would be new to the school as a result

of the proposed project are evening football games, graduation, and some schoolwide or school-sanctioned community events. These events would not occur concurrently with school pickup and dropoff times; thus such an evaluation would not be informative to the impact analysis of the Draft EIR. No changes to the Draft EIR or supporting LTA are required.

Comment A2-6 Response: Comment noted. The District appreciates Sacramento County Department of Transportation's review and comment on the Draft EIR.

COMMENT LETTER A3, SACRAMENTO COUNTY DEPARTMENT OF COMMUNITY DEVELOPMENT, OCTOBER 16. 2026

Response to Comment Letter A3, Sacramento County Department of Community Development

Comment A1-3 Response: The District appreciates Sacramento County's comment. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

2.2.3 ORGANIZATIONS

COMMENT LETTER O1. AMERICAN RIVER TREES, PETER SPAULDING; OCTOBER 15, 2026

Response to Comment Letter O1. American River Trees

Comment O1-1 Response: The information is noted. No specific environmental issue requiring further response is raised.

Comment O1-2 Response: The information is noted. Please see Response to Comment O1-3 and Master Response 9: Cumulative Impacts and Related Projects for discussion of the U.S. Army Corps of Engineers' American River Common Features erosion-control projects and their relationship to the cumulative impacts analysis.

Comment O1-3 Response: Draft EIR Section 4.2, "Biological Resources," evaluates the proposed project's effects on wildlife habitat and movement within the American River Parkway, including potential disturbance associated with increased lighting and noise. Under Impact 4.2-1 (pages 4.2-17 through 4.2-21), the Draft EIR considers potential changes in wildlife behavior and habitat use. Impact 4.2-4 (pages 4.2-24 through 4.2-25) evaluates potential interference with wildlife movement through the Parkway corridor. The analysis considers the anticipated magnitude, frequency, and duration of disturbance, surrounding habitat conditions, and absence of new physical barriers within the Parkway.

Draft EIR Section 7.1, "Cumulative Impacts," evaluates the project's potential contribution to cumulative impacts on biological resources. Master Response 9: Cumulative Impacts and Related Projects specifically addresses the U.S. Army Corps of Engineers' American River Common Features Contract 3B, including its approval history, pending litigation, and injunction restricting implementation. Master Response 9 explains the District's determination that uncertainty regarding whether, when, and in what form Contract 3B would proceed precluded its inclusion as a reasonably foreseeable cumulative project. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife.

Comment O1-4 Response: Draft EIR Section 4.2, "Biological Resources," evaluates potential effects on special-status wildlife, nesting and migratory birds, bats, and wildlife movement using biological surveys, habitat assessments, and available scientific literature. Under Impact 4.2-1 (pages 4.2-17 through 4.2-21), the Draft EIR acknowledges that increased nighttime lighting and noise could affect wildlife behavior, including foraging, nesting, roosting, migration, and habitat use. The analysis also considers construction-related noise and vibration, estimated operational noise exposure, modeled lighting conditions, anticipated disturbance frequency and duration, and sensitive wildlife life stages.

The Draft EIR does not establish separate numerical disturbance thresholds for each potentially affected species. Rather, it evaluates the significance of anticipated disturbance based on available biological information and project-specific exposure conditions. The analysis considers potential wildlife displacement but does not rely solely on the availability of alternative habitat. Under Impact 4.2-4, the Draft EIR also evaluates potential interference with

wildlife movement through the Parkway, considering the lighting design, intermittent event noise, and absence of new physical barriers. .As noted in the Draft EIR under Impact 4.2-1 (pages 4.2-17 through 4.2-19) and Impact 4.2-5 (pages 4.2-24 through 4.2-25), proposed light fixtures would infrequently contribute to minimal glare or skyglow during new nighttime events, including during the migratory season for birds. To more clearly reflect this, the determination for the impact of operational lighting on the movement of native species has been updated to less than significant in Chapter 3, "Errata" to this Final EIR.

The Final EIR errata clarify that operational lighting could result in limited effects on wildlife movement and revise the corresponding impact conclusion from no impact to less than significant. Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional scientific support regarding anticipated behavioral responses and the significance of operational lighting and noise exposure.

Comment O1-5 Response: Draft EIR Section 4.3, "Noise and Vibration" (pages 4.3-2 through 4.3-9), characterizes existing noise conditions using measurements collected at and around the project site, including during evening athletic activities. Although no evening ambient noise measurements were collected along the Parkway trail south of the project site, the Draft EIR includes nighttime measurements from other nearby locations. To evaluate anticipated stadium noise, the Draft EIR uses reference measurements collected during a high-attendance Rio Americano football game at El Camino High School. Monitoring began at approximately 4:00 p.m., before the 7:30 p.m. kickoff, and included both pregame activities and game operations. Draft EIR Section 4.2 (pages 4.2-20 through 4.2-21) uses these reference measurements to estimate noise exposure at the nearest Parkway riparian habitat and evaluates potential wildlife disturbance based on anticipated noise levels, event frequency and duration, and the sensitivity of nearby wildlife.

Draft EIR Section 4.2 evaluates the potential effects of increased operational noise on wildlife, including behavioral disturbance and habitat avoidance, considering estimated exposure levels and anticipated event frequency and duration. Draft EIR Section 5.13, "Recreation" (pages 5.13-33 through 5.13-34), evaluates effects on Parkway recreational use, including consideration of the Parkway's nighttime closure. Section 4.3 separately identifies operational stadium noise impacts as significant and unavoidable after mitigation. Draft EIR Chapter 6 evaluates the No Project Alternative, under which nighttime football games would continue at El Camino High School Stadium, and identifies it as environmentally superior while explaining that it would not achieve the identified project objectives. Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife and Master Response 8: Alternatives.

COMMENT LETTER O2, DARKSKY SACRAMENTO, OCTOBER 16, 2026

Response to Comment Letter O1, DarkSky Sacramento

Comment O2-1 Response: As stated on Draft EIR page 4.1-11, the lower American River from its confluence with the Sacramento River upstream to Nimbus Dam (23 river miles), which includes the portion parallel to Rio Americano High School, 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). See Master Response 3 with regard to existing lighting conditions along the American River Parkway and those that would occur under the proposed project.

Comment O2-2 Response: See Master Response 3 with regard to existing lighting conditions at the project site and surrounding developed areas and those that would occur under the proposed project.

Comment O2-3 Response: See Master Response 3 with regard to existing lighting conditions at and surrounding the proposed project site. With regard to the proposed egress pathway lights, these internal to the project site for a focused security path and not continuous with public light sources in public areas surrounding the project site. These lights would be on a timer and used as needed to ensure required on-site safety. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O2-4 Response: As the commenter did not provide any written comment on this text, no response is warranted.

Comment O2-5 Response: As the commenter did not provide any written comment on this text, no response is warranted.

Comment O2-6 Response: See Master Response 3 with regard to existing lighting conditions at and surrounding the proposed project site.

Comment O2-7 Response: See Master Response 3 with regard to existing lighting conditions along the American River Parkway and those that would occur under the proposed project.

Comment O2-8 Response: The highlighted text is a general characterization of existing light conditions within the American River Parkway and acknowledging the existence of trees that limit light trespass. The text does not address any specific light fixtures, nor propose the use of tree canopy to limit any specific light trespass. See Master Response 3 with regard to existing lighting conditions within the American River Parkway and those that would occur under the proposed project.

Comment O2-9 Response: Concurrence by the commenter with the characterization in the Draft EIR of the existing conditions of this area as LZ-0 is noted.

Comment O2-10 Response: The commenter does not provide any information or data that explains why lights should be turned off within two hours of sunset, what impact such action

would mitigate, or the effectiveness of such mitigation. Operational impacts on wildlife (including lighting, noise, and people) along with other biological resources are evaluated in Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27).

Comment O2-11 Response: The commenter correctly lists the total potential days of nighttime field use and the fact that such use would include use over the winter months. The commenter does not provide any information or data that specifies how this use would be deleterious to wildlife. Operational impacts on wildlife (including lighting, noise, and people) along with other biological resources are evaluated in Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27).

Comment O2-12 Response: The commenter is correct that the visual simulation accounted for existing trees, which are not proposed to be removed and would continue to be in place with implementation of the proposed project. However, the light and glare modeling conducted by Musco Lighting does not account for terrain, such as these trees. Therefore, the identified lighting levels in this report are not dependent upon the trees to reduce or limit light levels at the American River Parkway. See also, Master Response 3 with regard to existing lighting conditions within the American River Parkway and those that would occur under the proposed project.

Comment O2-13 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR and does not suggest any substantive revisions to the Draft EIR; the comment is noted.

Comment O2-14 Response: The highlighted text does not indicate that the project was reviewed by the IDA. Rather, it is explaining that IDA reviewed the same technology for a very similar project for proposed stadium lighting (not for existing lighting). This project was for the Jesuit High School Stadium Lighting project, which proposed four permanent stadium light poles at the Jesuit High School stadium, approximately one-quarter mile northwest of the proposed project. Two of the Jesuit High School light standards were proposed to be 100 feet tall and two were proposed to be 90 feet tall, all using the same lighting technology as the proposed Rio Americano High School project. The design and technology of this similar Jesuit High School project is highly comparable to the proposed project, particularly with regard to skyglow and light trespass outside the project site boundaries, regardless of the exact location. The analysis does not adopt the Jesuit High School analysis or findings, but uses this analysis for informational purposes. The Draft EIR analysis specifically considers the existing conditions at and surrounding the proposed project site and considers the lighting zones of the surrounding neighborhoods and the American River Parkway, which are unique to the proposed project site.

Comment O2-15 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR and does not suggest any substantive revisions to the Draft EIR; the comment is noted.

Comment O2-16 Response: This text is not making a comparison. Rather, it is reporting the modeled brightness of the proposed lights. The 10,016 candela is a direct, unobstructed line of sight brightness looking directly into fixture's beam, while the 3,992 candela average represents the mathematical average of all measured angles across the light span accounting for engineering controls (such as Musco's reflective visors and internal geometric shielding) keeping the overall ambient glare profile uniform and restricted. Instead of focused beams, the system is designed to compress its directional brightness. The text in this highlighted portion that states "all circuits on" is explaining that the reported brightness is under the condition in which the lights are on at their maximum brightness. The reported maximum scenario assumes all fields are active simultaneously. However, the system's design features four independent circuits controlling distinct groupings of fixtures across four poles at staggered, custom-engineered heights. Rather than an "all-or-nothing" approach, the four circuits allow the for a zonal control by sport/scene (e.g, the track zone allows for fixtures aimed to the apex of the track to be turned off for Football and Soccer games and reduce glare beyond the apex of the track near the homes).

Comment O2-17 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR and does not suggest any substantive revisions to the Draft EIR; the comment is noted.

Comment O2-18 Response: The commenter has not specified any type of additional analyses that he believes should have been included in the Draft EIR aesthetics analysis nor does this comment suggest any specific revisions to the Draft EIR; the comment is noted.

Comment O2-19 Response: While the commenter has noted opinions that the areas west, north, and east of the project site are LZ1, no additional data or analysis has been provided to support this opinion. See also, Master Response 3 with regard to existing lighting conditions at and surrounding the proposed project site.

Comment O2-20 Response: The comment is understood to express support of this component of Mitigation Measure 4.1-2. Comment is noted.

Comment O2-21 Response: The sentence is accurate that the proposed lighting plan was submitted to the International Dark Sky Association. This submittal was planned during the writing of the Draft EIR and, in order to provide the most complete design details, this submittal was delayed. The text does not assert that the validation had taken place or that the International Dark Sky Association had confirmed that the proposed lighting plan met any specified criteria at the time of the writing of this Draft EIR. However, the text has been clarified to note that the "proposed lighting plan for the proposed project *will be* submitted…" Furthermore, since the Draft EIR was published, the required "pass" rating from the Dark Sky Association has been received and is included in Attachment B to this FEIR.

Comment O2-22 Response: From an environmental and sports engineering perspective, removing the ball tracker would actually increase overall light pollution. Without a dedicated vertical tracking light, the only way to illuminate high-flying kicks or punts is to tilt the main stadium floodlights higher. Tilting standard fixtures upward would negate their built-in shielding and would cause light spill outside of the school

boundaries and skyglow. If the main lights are kept downward as designed, and no ball tracker is used, a "curtain of darkness" is created just above the light poles. When a ball is kicked into the air above this level, it would become not visible in the darkness and players attempting to track a high ball would experience a dangerous effect in which the ball is invisible until it suddenly drops back into the lower light layer only seconds or a fraction of a second before impact, increasing the risk of player collisions and head injuries.

Comment O2-23 Response: Operational impacts on wildlife (including lighting, noise, and people) along with other biological resources are evaluated in Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27). Potential physical environmental impacts from the proposed project on the American River Parkway are evaluated throughout the Draft EIR where appropriate, including consideration of lighting and biological resources. Furthermore, please see Draft EIR Mitigation Measure 4.1-2, which requires the District to 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 must 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, which has since been received and is attached to this FEIR in Attachment B. Construction would not be allowed to commence until the design receives the "pass" rating and approval letter, indicating appropriate standards regarding nighttime lighting skyglow are met. Accordingly, as evaluated in Impact 4.2-1 and Impact 4.2-4, proposed lighting would not contribute to glare or skyglow such that it would be expected to influence migratory bird stopover site selection. No changes to the Draft EIR are required.

Comment O2-24 Response: Riparian habitat is present in the American River Parkway. The south-side levee toe (i.e., on the American River Parkway side of the levee), where riparian habitat begins just north of the Jedediah Smith Memorial Trail, is 105 feet south of the Rio Americano High School southern boundary and at least 140 feet south of any proposed project improvements.

Comment O2-25 Response: The commenter is correct in identifying this error. As noted in Response to Comment O1-23, The south-side levee toe (i.e., on the American River Parkway side of the levee), where riparian habitat begins just north of the Jedediah Smith Memorial Trail, is 105 feet south the Rio Americano High School southern boundary and at least 140 feet south of any proposed project improvements. This typo has been corrected in Chapter 3, "Errata" to this Final EIR.

Comment O2-26 Response: The commenter is correct in identifying this less-than-significant impact. As noted in the Draft EIR under Impact 4.2-1 (pages 4.2-17 through 4.2-19) and Impact 4.2-5 (pages 4.2-24 through 4.2-25), proposed light fixtures would infrequently contribute to minimal glare or skyglow during new nighttime events, including during the migratory season for birds. The determination for the impact of operational lighting on the movement of native species has been updated to less than significant in Chapter 3, "Errata" to this Final EIR.

COMMENT LETTER O3. PRESERVE THE AMERICAN RIVER, BRENDA GUSTIN, PH.D, PRESERVE THE AMERICAN RIVER STEERING COMMITTEE; OCTOBER 16, 2026

Response to Comment Letter O3. Preserve the American River

Comment O3-1 Response: The District acknowledges receipt of the comment letter. The letter has been included in the Final EIR, and responses to the environmental issues raised are provided in Responses to Comments O3-2 through O3-18.

Comment O3-2 Response: The commenters concurrence with the comments submitted by Sacramento County Regional Parks on February 4, 2026, on the Draft EIR NOP are noted. The District received the NOP comment letter from the Sacramento County Regional Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the Sacramento County Regional Parks letter is provided in Draft EIR Appendix A

Comment O3-3 Response: The designation of the Lower American River is noted and consistent with as presented in the Draft EIR including in Section 4.1, "Aesthetics" (pages 4.1-12 and 4.1-14), "Biological Resources" (pages 4.2-13 to 14), Land Use and Planning (page 4.9-30), and as applicable throughout each of those respective impact evaluations. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR and does not suggest any substantive revisions to the Draft EIR; the comment is noted.

Comment O3-4 Response: Draft EIR Section 4.2, "Biological Resources," evaluates existing habitat conditions and the potential occurrence of special-status species within and adjacent to the project site, including riparian habitat associated with the American River Parkway. The proposed improvements would be constructed within the existing school campus and would not involve direct removal of riparian habitat within the Parkway. The Draft EIR nevertheless evaluates potential indirect effects associated with construction and operation, including noise, nighttime lighting, and disturbance to wildlife. Draft EIR Sections 4.1, 4.2, and 5.9 evaluate the proposed project's potential effects on Parkway resources and consistency with applicable policies. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for further discussion of the applicable Wild and Scenic River protections and Parkway Plan provisions, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional discussion of potential effects on Parkway wildlife.

Comment O3-5 Response: See the discussion of "Environmental Setting and Project Site Boundaries" in Master Response 10: Accurate, Stable, and Finite Project Description for information regarding the parkway boundaries in relation to the proposed project and evaluation of impacts in the Draft EIR.

Regardless of the jurisdictional distinction between the levee and the Parkway, Draft EIR Section 4.2 evaluates biological resources based on existing habitat conditions and species with potential to occur within and adjacent to the project site. The biological resources analysis therefore considers potential effects on adjacent riparian habitat and wildlife rather than limiting its evaluation to the boundaries of the school campus. Please see Master Response 1: Consistency

with Applicable Zoning and Other Regulations Governing Land Use and Response to Comment O4-35 for additional discussion of the levee and Parkway setting.

Comment O3-6 Response: Draft EIR Section 5.9, "Land Use and Planning" (pages 5.9-29 through 5.9-30), evaluates the proposed project's consistency with applicable land use plans and zoning provisions. The proposed improvements would occur within the existing Rio Americano High School campus and would not require a land use designation change or expansion of the campus boundary.

Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use addresses the District's authority under Government Code Section 53094 to render local zoning ordinances inapplicable to qualifying school facilities, subject to the required action by the District's governing board.

Comment O3-7 Response: This comment quotes a comment on the Draft EIR NOP provided by Sacramento County Parks Department. The District received the NOP comment letter from the Sacramento County Regional Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the Sacramento County Regional Parks letter is provided in Draft EIR Appendix A. The Sacramento County Parks Regional Department did not submit any comment letter on the Draft EIR. Each topic area raised in the quoted text, including reference to the American River Parkway Plan, asserted impacts to aesthetic and biological resources, cumulative effects, and suggested alternatives were considered in the drafting of the Draft EIR and addressed throughout the Draft EIR, including Draft EIR Sections 4.1, 4.2, 5.9, Chapter 6 and Section 7.1, which evaluate potential effects on Parkway scenic resources, biological resources, consistency with applicable land use plans and policies, alternatives to the proposed project, and cumulative impacts, respectively. This comment does not further expand up on or make any direct independent statements on the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O3-9 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the District notes the stated economic benefit of the American River Parkway.

Comment O3-9 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the District notes the comment's reference o the location of Rio Americano High School and proposals to create a "STEAM Program" at the District.

Comment O3-10 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the District notes the selection of the Lower American River as a Sentinel Project under the Sustainable Interdisciplinary Research to Inspire Undergraduate Success Project.

Comment O3-11 Response: The comment asserts potential impacts to species due to relocation as a result of light and sound, without evidence to such claims, and incorrectly states that no mitigation is proposed. The Draft EIR comprehensively evaluations potential impacts to biological resources, including result of proposed project lighting and noise sources, in Section 4.2, "Biological Resources." In addition, the Draft EIR

identifies multiple mitigation measures to reduce potential impacts associated with light and noise and biological resources, including Mitigation Measures 4.1-2, 4.2-1a through 4.2-1e, and 4.3-1a and b. With regard to the United States Army Corp of Engineers and related impacts, please see Master Response 9: Cumulative Impacts. No changes to the Draft EIR are required.

Comment O3-12 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O3-13 Response: Please see Master Response 8: Alternatives.

Comment O3-14 Response: Please see Master Response 8: Alternatives.

COMMENT LETTER O4. RIO AMERICANO COMMUNITY ALLIANCE; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4. Rio Americano Community Alliance

Comment O4-1 Response: The District appreciates the commenter's review of the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4-2 Response: Draft EIR Chapter 3, "Project Description," provides a complete description of the proposed project and anticipated operational activities with implementation of the proposed project. The Draft EIR contains a thorough, detailed, quantified analysis of all of the project's potential physical impacts on the environment. In the case that an impact is determined to be potentially significant, mitigation is identified to reduce such impacts to less than significant, where feasible. As more fully explained in Master Response 10, the District's 2010 EIR and mitigation commitments were for a different project that was considered 16 years ago and therefore are not applicable here. (See *California Native Plant Society v. City of Santa Cruz (*2009) 177 Cal.App.4th 957, 994-995.) Feasible alternatives that could reduce significant impacts are described and evaluated in Chapter 6. Please see responses to comments I04-3 through I04-226 and Master Responses 8 and 10. No changes to the Draft EIR are required.

Comment O4-3 Response: The identified Exhibits A through J attached to this comment letter are received and responses provided to each attachment individually in responses to comment letters O4A through O4J, below. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-4 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the request for written notice of the Final EIR, any hearing on the Project, and any Notice of Determination is noted.

Comment O4-5 Response: The District appreciates the commenter's review of the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4-6 Response: Please see response to comment O4-2.

Comment O4-7 Response: The identified reports and supporting materials are noted and identified as attachments to this comment letter; responses are provided to each attachment individually in responses to comment letters O4A through O4E, below. All submitted materials have been included in the administrative record.

Comment O4-8 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-9 Response: The commenter accurately summarizes the proposed project improvements and anticipated operational activities that may be accommodated by the proposed project improvements. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted

Comment O4-10 Response: See Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-11 Response: The proposed project objectives are focused on serving Rio Americano High School. Education Code § 38131 establishes that every public school facility and grounds in California must have a "civic center" for community use, and it outlines the purposes for which school districts may grant access. Accordingly, San Juan Unified School District Board of Directors approved the District's Use of School Facilities Handbook (revised 2023), which outlines the process for community use of school facilities, which includes the existing Raider Stadium and that as it would exist with implementation of the proposed project, under a structured permit, fee, and eligibility system that mirrors the statute's list of authorized purposes. While Rio Americano and other District campuses do not have a history of frequent community use, the Draft EIR uses reasonable and conservative assumptions for the analysis presented therein. For example, for the air quality analysis, the underlying vehicular activity assumes eight new home football games per year (the actual level of activity would be between five and eight games per year), four school assemblies, graduation and four new potential school-sanctioned community events, which were assumed to be peak-attendance events. Draft EIR Chapter 3, "Project Description," defines the proposed project components and the range of existing and future activities accommodated on-site (i.e., number of attendees that may attend various events) that would occur with implementation of the proposed project. The EIR appropriately evaluates multiple scenarios that represent the range of activities that would be accommodated by implementation of the proposed project. The Draft EIR provides a detailed accounting of the existing conditions, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares the existing conditions to what would occur under the proposed project.

Furthermore, the commenter references one of the proposed project objectives to "[e]xpand the capability of Rio Americano High School to host athletic and non-athletic events." This is an accurate reference to Draft EIR Section 3.4, "Project Objectives." However, the "non-athletic" events does not infer an intent to increase the school's hosting of community events; rather, the Draft EIR identified non-athletic events that could be more adequately accommodated by the proposed project improvements, including school assemblies and graduation. See also, Master Response 10 regarding a stable project description.

Comment O4-12 Response: See Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-13 Response: Regarding the specific statutory provisions identified by the commenter, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, which discusses Public Resources Code Section 5842, Government Code Section 53094, and the District's authority concerning local zoning. The proposed project involves minimal ground disturbance for the four proposed light poles, footings for the bleachers, and new and replacement pedestrian egress lighting, which does not require a grading permit.

Comment O4-14 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. Since the issuance of the NOP, the District has

decided not to pursue state matching school-construction funding that would require California Department of Education approval of the project.

Comment O4-15 Response: See response to comment O4-2 and Master Response 9: Cumulative Impacts and Related Projects.

Comment O4-16 Response: The comment accurately describes the project site zoning and surrounding residential neighborhoods. Regarding the American River Parkway and its Rio Americano subarea, please see Master Response 10 regarding "Environmental Setting and Project Site Boundaries." The comment also accurately notes that the proposed light standards would be visible from the levee and partially from the Parkway, and that the levee itself does not eliminate noise, skyglow, or visibility of the light poles, biological disturbance or the relevance of the adjacent Parkway. The Draft EIR evaluates the potential environmental impacts associated with project-noise, lighting, and drainage in Section 4.3, "Noise and Vibration," Section 4.1, "Aesthetics," Section 5.8, "Hydrology and Water Quality," and Section 4.2, "Biological Resources," No significant impacts to the American River Parkway were identified in the Draft EIR from project-related noise, lighting, or drainage, and Parkway was very clearly identified as a relevant proximate land use and habitat and evaluated in the Draft EIR.

Comment O4-17 Response: This comment describes the Rio Americano subarea designated by the Parkway Plan for Limited Recreation. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-18 Response: See Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, as well as responses to comments O4-59 through O4-97 and O4-154 through O4-168. For the reasons stated therein, no changes to the Draft EIR are required.

Comment O4-19 Response: The District received the NOP comment letter from the Rio Americano Community Alliance and considered the comments therein during preparation of the Draft EIR; a copy of the Rio Americano Community Alliance letter is provided in Draft EIR Appendix A.

Comment O4-20 Response: The commenter has suggested the addition of eight topics to the listing of potential areas of concern and issues to be resolved presented in Section 1.3 of the Draft EIR. As noted in this section of the Draft EIR, "[t]opics 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. Copies of the NOP comment letters, along with a summary of all of the comments received, are contained in Attachment 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" (Draft EIR, page 1-2 and 1-3). The commenter is referred to the full set of responses to the NOP provided in the Draft EIR appendix, and as augmented in this FEIR. To the extent that any topic raised as a part of the scoping phase of the Draft EIR or in the additional community engagement relates to a potential adverse environmental impact of the proposed project, all such topics are fully addressed in the Draft EIR. The primary areas of expressed concern identified in the Draft

EIR included 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. This is a fair and accurate summary of the topics of concern raised during scoping. The additional topics suggested by the commenter, if related to a potential adverse environmental impact of the proposed project are comprehensively addressed in the Draft EIR, and are included here for decision maker consideration. No change to the Draft EIR is needed.

Comment O4-21 Response: Impact 4.1-1 acknowledges the non-zero footcandle values that would result from the proposed lighting system at various locations at and surrounding the project site perimeter and uses this information, as well as other factors presented in Impact 4.1-1 to inform a determination of significance. The reference to "zero light trespass" specifically points to that at the surrounding public roadways and adjacent residences; for clarification, and as shown in the Lighting Report, the zero footcandle modeled results are at the front (streetside) of adjacent residences. 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, the project applicant elected to provide a comparison of nighttime lighting changes from the surrounding private residences, which was included in the project's Lighting Report. No changes to the Draft EIR are required.

Comment O4-22 Response: See Master Response 10: Accurate, Stable, and Finite Project Description. The biological resources impact evaluation (Impact 4.2-1, Draft EIR pages 4.2-16 through 4.2-17 and 4.2-20 through 4.2-21) acknowledges that 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 impact evaluation further explains that 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 and would not result in a significant impact related to 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.

Comment O4-23 Response: See Master Response 10: Accurate, Stable, and Finite Project Description. With regard to the difference in significance findings between the potential impact of noise on biological resources (Impact 4.2-1, Draft EIR pages 4.2-16 through 4.2-17 and 4.2-20 through 4.2-21) and noise impacts on surrounding residences (Impact 4.3-1, Draft EIR pages 4.3-16 through 4.3-27), the applicable thresholds and approach to impact analysis differ between the two resource topics. Distinct from the analysis of biological resources and noise, as contained in Draft EIR Impact 4.2-1 and described above in response to comment 04-22, the noise evaluation in Section 4.3 on the impact of stadium-generated noise on residences applies an industry standard threshold that considers even the intermittent, temporary increase of noise levels at residential receptors to be a significant impact. CEQA Guidelines section 15064(b)(1) explains that "[t]he

determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." (See *California Oak Foundation v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 282 [urban setting in which trees were planted lessened their biological significance]; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 375 ["a lead agency has the discretion to determine whether to classify an impact described in an EIR as 'significant,' depending on the nature of the area affected"].) Similarly, a noise impact may be significant based on the adopted local policies but less than significant in terms of any biological resources impact as local noise standards would be developed based on impact on human activities and settings. See also Master Response 2 in which this is discussed further.

Comment O4-24 Response: The commenter is correct that the cumulative noise discussion explains how noise sources do not always contribute cumulatively to noise levels at individual receptors, which is due to the attenuation of noise over distance and due to various environmental factors such as topography, land use, and shielding, and because noise is not a lasting phenomena that continues after the noise source terminates. The commenter is also correct that the cumulative analysis for operational noise is found to be cumulatively considerable and unavoidable, which, as described in Draft EIR page 7-10, because the proposed project itself is found to have a significant and unavoidable impact related to long-term operational noise generation. No changes to the Draft EIR are required.

Comment O4-25 Response: The Draft EIR's vibration analysis evaluates operational ground-borne vibration at offsite receptors using standard vibration metrics and criteria. The proposed project does not include long-term operational sources (e.g., continuous heavy mechanical processes) that would generate perceptible ground-borne vibration at offsite locations; accordingly, and as noted by the commenter, the Draft EIR states there are no long-term operational vibration sources. Separate from ground-borne vibration, footfall on bleachers can excite the bleacher structure locally and radiate as airborne sound. That "vibration-related noise" is part of the overall stadium noise environment and was evaluated within Impact 4.3-1 using applicable noise metrics. Mitigation measures referencing "footfall or vibration-related noise" address bleacher panel resonance and rattles (airborne sound) through isolation, damping, and fastening improvements. These measures do not indicate the presence of offsite ground-borne vibration impacts. Therefore, there is no contradiction: the vibration analysis properly finds no long-term operational vibration sources affecting offsite receptors, while the noise analysis appropriately accounts for bleacher footfall as part of stadium noise and identifies design-focused noise controls. No changes to the Draft EIR are required.

Comment O4-26 Response: See responses to comments O4-21 through O4-25 and Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-27 Response: This comment summarizes requirements of a finite project description, and does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-28 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description. With regard to the commenter's note that graduation is described as drawing 1,400 people, the reference for this data point in not provided and the District cannot identify such a data point in the Draft EIR. Therefore, and for the reasons laid out in Master Response 10, no changes to the Draft EIR are required.

Comment O4-29 Response: The District recognizes how the terminology as it pertains to the lighting technology and design can be confusing to members of the general public who might not be familiar with such equipment, technology, or design terminology. A "luminaire" is the technically correct term for a complete lighting unit, while a "fixture" is a more general or colloquial term. Draft EIR Page 3-6 provides a parenthetical that identifies the term "luminaires" as interchangeable with "lighting fixtures." The Draft EIR Project Description (page 3-6) does correctly describe that each of the four stadium light poles would contain fixture attachments at heights ranging from 16 to 80 feet; however it incorrectly states that "[t]he 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…" Rather, each fixture attachment would contain between one and eight fixtures (or luminaires), and there would be a total of 16 fixtures (or luminaires) per pole, for a total of 64 fixtures among all four stadium lighting standards (poles). While the numbers in this statement were incorrectly presented, the analysis for all resources areas that may be impacted by lighting use the information provided in the MUSCO Lighting Report (Attachment B to the Draft EIR), and lighting impacts are accurately and consistently analyzed throughout the Draft EIR. The necessary edits to the statement in Section 3.2.1, "Project Components," of the Draft EIR (Page 3-6 of the Draft EIR) has been revised; these edits are shown in Chapter 3, "Errata" of this Final EIR.

Comment O4-30 Response: See Master Response 10: Accurate, Stable, and Finite Project Description, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O4-31 Response: Draft EIR Chapter 3, "Project Description," defines the proposed project components and the range of existing and future activities accommodated on-site (i.e., number of attendees that may attend various events) that would occur with implementation of the proposed project. The EIR appropriately evaluates multiple scenarios that represent the range of activities that would be accommodated by implementation of the proposed project. The Draft EIR provides a detailed accounting of the existing conditions, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares the existing conditions to what would occur under the proposed project. As the use of existing diesel-powered portable lights is at the discretion of the school as existing on-site equipment to support school activities, there is not a detailed tracking of each use of such lights. Photo Viewpoint KOP-4, KOP-5, and KOP-6 provide views of the existing Raider Stadium, and the levee and Parkway to the south of the school boundary during a nighttime girls' soccer game at Raider Stadium, during which

the portable lights were used to accommodate the use of the existing stadium for this evening game. The existing diesel-powered portable lights can be manually adjusted for light directionality through fixture adjustment, rotation, and mounting angle; there are no anti-glare shields or specialty spill controls. Contrary to the commenter's comment that the "Draft EIR relies heavily on the current use of portable diesel-powered lights to characterize existing nighttime light, noise, emissions, and event activity," the Draft EIR, in actually, provides the context of the existing use of these lights to appropriately present the baseline conditions. The Draft EIR does not imply that these lights are used all the time and does not characterize all existing nighttime, light, noise, emissions or activity as dependent upon and using these lights. Rather, the Draft EIR presents the information for the reader to understand that, even under existing conditions and without the proposed project, there are evening activities that make use of nighttime lighting and generate noise, as well as some toxic air contaminant and criteria air pollutant emissions in this case, due to these portable lights being the currently-available equipment to light Raider Stadium. Furthermore, while the use of these diesel-powered portable lights are identified in the Draft EIR as part of the existing conditions, such use is not relied upon to inform the significance determinations throughout the Draft EIR. While the Aesthetics impact analysis (Draft EIR pages 4.1-16 through 4.1-26) acknowledges that the existing use of diesel-powered portable lights are currently used, the significance determination is rooted in the data in the Lighting Report (Appendix B to the Draft EIR) and presented within the Draft EIR analysis, as well as the Visual Simulations prepared to demonstrate expected views from key viewpoints, including surrounding roadways, neighborhoods, and the Jedediah Smith Trail. The Biological Resources impact analysis (Draft EIR page 4.2-15 through 4.2-27) also acknowledges the existing use of diesel-powered portable lights and the light and noise that they generate while in use, but also rely on noise-modeling (which did not include portable diesel-powered lights in operation during existing ambient noise monitoring) and the data from the Lighting Report, as applicable, to inform the determination of potential impacts. Finally, the Noise and Vibration impact analysis (Draft EIR page 4.3-16 through 4.3-27) also acknowledges that existing evening and nighttime events may use the diesel-powered portable lights, but the ambient noise monitoring data that is applied to identify the potential net increase in noise levels from existing ambient conditions to peak event conditions with implementation of the proposed project did not include such on-site noise source, therefore provided a conservative analysis (i.e., reduced noise existing noise levels and greater potential increase in noise levels with implementation of the proposed project). Therefore, the Draft EIR accurately represented existing conditions and did not rely on the existing use of diesel-powered portable lights at Raider Stadium as the basis of analysis or impact determination. No changes to the Draft EIR are required.

Comment O4-32 Response: Regarding facilities and operations approved in the past related to other projects and previous environmental documentation, as made clear in the NOP, Initial Study, scoping meeting, community meetings, and the Draft EIR, the project considered by the District has no relationship to any other projects or environmental documents. The commenter makes reference to "facilities and operations approved by the 2010 EIR" – any such proposed project or environmental review that the commenter intends to reference here is unrelated to the proposed project addressed in the Draft EIR and in this FEIR. The

commenter makes reference to "improvements later approved through categorical exemptions or separate actions" – any such proposed project or environmental review or exemption that the commenter intends to reference here is unrelated to the proposed project addressed in the Draft EIR and in this FEIR. With regard to point #3, regarding the actual physical conditions when the 2026 NOP was issued, please refer to Sections 3.1.1, 4.1.1, 4.2.1, 4.3.1, 4.4.1, and 4.5.1 of the Draft EIR – these sections detail the actual physical conditions that serve as the environmental baseline against which project impacts are assessed. With regard to the commenter's reference to "maximum operations those successive improvements now make possible," please see Section 3.1.2 – it is true that Rio Americano High School was constructed in 1963, had additions to the school in 1965–1967, and several modernizations in 1996, and in the early 2000s after a fire destroyed the theater and counseling offices, bleacher seating and small upgrades in 2006, and improvements to the stadium were completed in 2019. Please see also Section 7.1 of the Draft EIR, which identifies the cumulative context where effects attributable to the project are evaluated as to whether they are cumulatively considerable. With regard to the commenter's suggestion that "[t] Final EIR should provide a comparison identifying the components approved, constructed, or left unbuilt under each prior action; the attendance and operating assumptions used in each environmental review; and all mitigation measures or operational limits that remain applicable," the proposed project is detailed in Chapter 3 of the Draft EIR, and the direct and reasonably foreseeable effects of the proposed project are addressed comprehensively throughout Chapter 4 of the Draft EIR and in a cumulative context in Chapter 7 of the Draft EIR. The proposed project has no relationship to any other project considered in the past by the District or subject to separate environmental review. See also Master Response 10. No change to the Draft EIR is needed.

Comment O4-33 Response: See response to comments O4D-1, O4D-2, O4D-14, O4D-25, O4D-26, O4D-28, O4D-29, O4D-36, O4D-40, AND O4D-45 through O4D-53

Comment O4-34 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-35 Response: The Draft EIR Section 4.2, "Biological Resources," evaluates the potential for impacts based on the existing habitat and species with potential to occur, regardless of the jurisdiction of any individual land use. Draft EIR Section 4.2.1, "Environmental Setting," for the Biological Resources section accurately describes the surrounding habitat, including that of the Parkway and the levee. Whether the levee is considered part of the Parkway or not, the question for the purposes of impact evaluation is the type and quality of habitat. As noted in the Draft EIR (page 4.2-9), the levee is maintained for flood control purposes and does not provide suitable habitat for special-status and protected species. Similarly, Draft EIR (page 4.2-2) describes the riparian existing habitat and species known to or with potential to occur associated with the American river and surrounding vegetation. The statements within the Draft EIR about separation of the project site and the Parkway by way of the levee is to inform the reader of this elevated, paved, and maintained flood control infrastructure that exists and does, in fact, differ in the type and quality of habitat from that which is on the waterside of the levee. These existing conditions are accurate and form the

basis for the impact analysis contained within Section 4.2, "Biological Resources."

Furthermore, while the commenter references comments from the Sacramento County Parks Department on the Notice of Preparation of the Draft EIR, the District received the NOP comment letter from the Sacramento County Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the County Parks letter is provided in Draft EIR Appendix A. The Sacramento County Parks Department did not submit any comment letter on the Draft EIR. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 10: Accurate, Stable, and Finite Project Description. For the reasons stated therein and explained above, no changes to the Draft EIR are required.

Comment O4-36 Response: As described in the Draft EIR (page 4.1-9 and 4.1-10), the Joint Illuminating Engineering Society and International Dark-Sky Association 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; they are not regulatory. The California Building Standards Code (Title 24) does not apply to sports lighting, but does provide guidance relative to an understanding of the existing lighting environment. Finally, the Electric Power Research Institute commissioned a report entitled Light Trespass Research by Ian Lewin, PhD, which presented recommended maximum illuminance levels for the environmental zones described – these, again, are best practice expert recommendations, not regulatory standards. These lighting zone classifications were presented in the Draft EIR to provide a framework and reasonable basis of impact evaluation for the purposes of CEQA and do not purport to be regulatory in nature. There is no adopted standard or regulation that defines a lighting classification for the landside levee toe versus the levee crown versus the waterside levee toe. Nonetheless, the Draft EIR uses substantial evidence and criteria developed by experts in illumination to evaluate the project site and surrounding land uses appropriately based on existing conditions and the framework of lighting zones and recommended illuminance levels detailed in the Draft EIR. At the southern boundary of the project site, the primary potential environmental impact that could be attributable to the proposed project lighting is that on biological resources. These impacts are evaluated comprehensively in Draft EIR Section 4.2, "Biological Resources." The identification of lighting zones does not determine the potential for impact. Rather, it is informed by the modeled light levels and consideration of the existing environmental setting, quality of habitat, potential for species occurrence, and the scale of potential impacts associated with the lighting levels, as modeled, that would result from the proposed project at various distances from the project site. See also Master Response 10: Accurate, Stable, and Finite Project Description and the response to comment O4-35. For the reasons stated therein and explained above, no changes to the Draft EIR are required.

Comment O4-37 Response: With regard to American River Parkway Plan consistency, see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. For the reasons stated therein, no changes to the Draft EIR are required.

Comment O4-38 Response: See Master Response 9: Cumulative Impacts. For the reasons stated therein, no changes to the Draft EIR are required.

Comment O4-39 Response: See Master Response 9: Cumulative Impacts. The Draft EIR contains a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13). With regard to the 2018 DSA application, this was for previous maintenance and improvements to the existing fields, including the all-weather track and field, refurbished adjacent fields and courts, a new scoreboard, and renovated restrooms and concessions. This is separate from the proposed project. With regard to the District's Facilities Master Plan, at the present time, the District has no plans to make additional improvements at the Rio Americano High School campus. If and when the District were to decide to make any additional future improvements at Rio Americano High School, the District would prepare the appropriate environmental document as required by CEQA. As made clear in the NOP, Initial Study, scoping meeting, community meetings, and the Draft EIR, the project considered by the District has no relationship to any other projects or environmental documents prepared by the District. Any previous project or environmental review is unrelated to the proposed project addressed in the Draft EIR and in this FEIR. The proposed project is detailed in Chapter 3 of the Draft EIR, and the direct and reasonably foreseeable effects of the proposed project are addressed comprehensively throughout Chapter 4 of the Draft EIR and in a cumulative context in Chapter 7 of the Draft EIR. The proposed project has no relationship to any other project considered in the past by the District or that was subject to separate environmental review. See also Master Response 9: Cumulative Impacts and Master Response 10: Accurate, Stable, and Finite Project Description. No change to the Draft EIR is needed.

Comment O4-40 Response: See Master Response 9: Cumulative Impacts. For the reasons stated therein, no changes to the Draft EIR are required.

Comment O4-41 Response: See Master Response 9: Cumulative Impacts. For the reasons stated therein, no changes to the Draft EIR are required.

Comment O4-42 Response: See Master Response 4: Mitigation.

Comment O4-43 Response: See Master Response 4: Mitigation.

Comment O4-44 Response: See Master Response 6: Parking Availability.

Comment O4-45 Response: See Master Response 4: Mitigation. Regarding the commenter's note that mitigation measures need to use the terms "shall" and "must," the applicable mitigation measures of the Draft EIR have been revised to use this terminology, rather than using the term "should." These edits are provided in Chapter 3, "Errata," of this Final EIR.

Comment O4-46 Response: See responses to Comments O4D-28 and O4D-29.

Comment O4-47 Response:. Mitigation Measure 4.4-3c has been revised with clarifying edits to outline specific requirements for the Event Management Plan. See also Master Response: Mitigation.

Comment O4-48 Response: Please see responses to Comments O4B-3, Maser Response 2, O4C-18, O4B-122. O4B-126, O4B-112.

Comment O4-49 Response: Please see response to Comment O4C-18.

Comment O4-50 Response: Please see response to Comments O4D-25, O4D-32, and O4D-47.

Comment O4-51 Response: With regard to evidence of potentially feasible mitigation, please see Master Response 4: Mitigation. With regard to evaluation of additional mitigation evidence raised in Comments O4-47 through O4-50, please see respective responses to Comments O4-47 through O4-50 and related comment responses identified therein provided below on the applicable exhibits attached to this comment letter.

Comment O4-52 Response: The District acknowledges the date discrepancy noted. The LTA and the VMT analysis included as Draft EIR Appendices E and F are the September 1, 2026 versions, and those are the precise versions on which the Draft EIR analysis relied. The "Draft" watermark on the LTA reflects internal quality-control status at the time of compilation and not the substantive status of the analysis. The references list in the Draft EIR inadvertently cites earlier dates (LTA: July 3, 2026; VMT: June 19, 2026). This has been corrected, as noted in Chapter 3, "Errata" to this Final EIR to reflect the September 1, 2026 date for both studies. This correction does not alter the Draft EIR's analysis, findings, or conclusions. All technical materials relied upon in the Draft EIR—lighting, biological surveys, noise, transportation, VMT, air quality, and project operations—were made available for the full public review period.

Comment O4-53 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-54 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-55 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-56 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-57 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-58 Response: Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-59 Response: As explained in Draft EIR Section 4.1, "Aesthetics," (page 4.1-15), the project site itself and the surrounding areas to the north, east, and west do not constitute scenic vistas. Views of the American River Parkway south of the project site are blocked by the elevated American River north bank flood control levee, and a line of tall trees along the school campus' southern property boundary. Thus, the Draft EIR appropriately concludes that the project would

have no impact on a scenic vista. As detailed throughout the Draft EIR and, in particular, within Section 4.1, "Aesthetics," the project site is developed with buildings and other improvements and is surrounded to the north, east, and west by existing development, as well. The school was constructed in 1963 and improved over time as the surrounding area was developed primarily for single-family housing. The proposed project would involve relatively minor visual changes to an existing high school campus – as an indication of the level of change attributable to the proposed project, the total land area disturbed by the proposed project would be less than one percent of the area of the Rio Americano campus. The only public viewpoints in the project vicinity are from American River Drive immediately north of the project site and pedestrians and bicyclists on the paved crown (maintenance access road) of the north bank of the American River levee. The intervening elevated flood control levee screens the project site from view from the Jedediah Smith Memorial Trail and other recreational areas within the Parkway. While portions of the proposed light poles would be visible off-site, they would be relatively small in diameter and during the day when the Parkway is open, they would tend to blend in with the sky background (Draft EIR, page 7-3). The important question in the context of CEQA analysis is whether a project would affect scenic resources. This is made clear throughout the CEQA statute and Guidelines – the pertinent question is whether a project would "damage…scenic resources" (CEQA Guidelines Section 15300.2[d]), would "[h]ave a substantial adverse effect on a scenic vista…" or "[s]ubstantially damage scenic resources…" (CEQA Guidelines Appendix G Environmental Checklist Form). Exceptions to exemptions also emphasize that the relevant question is whether a project would affect scenic resources, and not whether a project would affect an existing developed property that is near scenic resources – for example, the Class 4 categorical exemption creates exceptions to the exemption if a project would affect mature, scenic trees or would involve grading in an officially designated scenic area (CEQA Guidelines Section 15304). The clarity of this question has also been affirmed by court rulings on this question – for example, the City of Los Angeles approved an elder care facility in Pacific Palisades, using the Class 32 categorical exemption for infill development. A neighborhood group filed suit, claiming that the project would have a significant aesthetic impact, but the Court of Appeal supported the City's use of this exemption, in part, since the project would not have an adverse effect on scenic resources since the project is located in "an area highly developed with residential and commercial uses" *Pacific Palisades Residents Assoc. v. City of Los Angeles* (March 8, 2023) Cal.App.5th. The evaluation in the Draft EIR is consistent with the CEQA statute, the CEQA Guidelines, precedent case law, and the District's reasoning supported by substantial evidence in the Draft EIR.

Comment O4-60 Response: Impact 4.1-1 acknowledges the non-zero footcandle values that would result from the proposed lighting system at various locations at and surrounding the project site perimeter and uses this information, as well as other factors presented in Impact 4.1-1 to inform a determination of significance. The reference to "zero light trespass" specifically points to that at the surrounding public roadways and adjacent residences; for clarification, and as shown in the Lighting Report, the zero footcandle modeled results are at the front (streetside) of adjacent residences. The commenter's references to various data points contained within the Musco Lighting Report are data points that exist within the Report. However, these data points do not contradict the evaluation or conclusions of the Draft EIR.

The property-line ranges of 0.02-0.13 are along the western school perimeter at the back fenceline of adjacent residential properties. 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, the project applicant elected to provide a comparison of nighttime lighting changes from the surrounding private residences, which was included in the project's Lighting Report. The property-line ranges of 0.40 and 0.37 are at the southern school perimeter and are not applicable to the analysis presented in the Draft EIR, as they are not at a receptor location. The 10,016 candela is a direct, unobstructed line of sight brightness looking directly into fixture's beam, while the 3,992 candela average represents the mathematical average of all measured angles across the light span accounting for engineering controls (such as Musco's reflective visors and internal geometric shielding) keeping the overall ambient glare profile uniform and restricted. Instead of focused beams, the system is designed to compress its directional brightness. Regarding the consideration of this as within the 'low' brightness range, please see Attachment C to this Final EIR that graphically represents the scale and also types of lights and technology over time relative to this scale.

Comment O4-61 Response: The Draft EIR Project Description (page 3-6) describes the fixture count and ball-tracker and the analysis relies on the Musco Lighting Report (Attachment B to the Draft EIR) to evaluate potential impacts based on the maximum scenario reported outputs, including light temperature, intensity, and trespass, all of which is distinguished throughout the Draft EIR. See also response to comment O4-29 with regard to the fixture count. The comment in not specific as to what additional resolutions on these items are needed. The comment also identifies the proposed system's "RGBU" circuit and related fixtures, and asserts that they need to be disclosed as part of the Draft EIR. This circuit is included in the Musco Lighting Report as part of the Draft EIR and support brief (e.g., on the order of magnitude of seconds – such as 5 to 10 seconds) use of colored lights during key game activities such as introductions or a touchdown. The duration is minimal, the color spectrum is darker than the field lighting, and the use does not change the lighting design such as shielding and downward aim to minimize light trespass and avoid glare and skyglow; the impacts assessed based on outputs in the Musco Lighting Report for the maximum lighting scenario of all fixtures in use represent a conservative (i.e., greater potential impacts) analysis. It is not required to evaluate all potential light-use scenarios that would be less intensive than that used to inform significance determinations and identify applicable mitigation.

Comment O4-62 Response: Each instance of a measured distance is explained relative to the context and the variation is based on whether measuring from the light standard, proposed disturbance area, or school boundary, as well as whether measuring to the levee toe, various points along Jedediah Smith Trail (which curves), or the Parkway, as well as some rounding (i.e., 225 feet rounded to 230 feet). Regardless of the distances presented in each case, the evaluations informed throughout these commenter-referenced statements in Section 4.1, "Aesthetics," are supported by evidence regarding measured light modeling at various points (as shown in graphical format with the modeled light outputs overlain on an aerial basemap, such that exact distances are not the data point used to inform the analysis) and

visual simulations as provided in Section 4.1. The specific distances are not the basis of impact analysis and determination.

Comment O4-63 Response: Draft EIR Section 4.1, "Aesthetics," contains detailed analyses evaluating the project's potential to create glare and skyglow, as well as a photometric analysis performed by Musco Lighting that is discussed in Section 4.1 and attached to the Draft EIR as Appendix B. Draft EIR. In accordance with Mitigation Measure 4.1-2 (Draft EIR page 4.1-26), following publication of the Draft EIR, the District submitted the proposed lighting design to the International Dark Sky Association for a Design Analysis and requested a determination as to whether the design meets the program guidelines. The proposed project meets Dark Sky Outdoor Sports Lighting Program criteria and has received a "pass" rating for lighting performance (see Appendix B to this FEIR). No changes to the Draft EIR are required.

Comment O4-64 Response: See response to Comment O4-63; as the requirements of Mitigation Measure 4.2-2 have bene met and the DarkSky Association "pass" rating has been received for the proposed project stadium lighting, the commenter's suggestions are not applicable. No changes to the Draft EIR are required.

Comment O4-65 Response: Please see responses to Comments O4B-20 through O4B-23, O4B-30 through O4B-32, and O4B-50.

Comment O4-66 Response: Please see responses to Comments O4B-20 through O4B-32, O4B-50, O4B-58, and O4B-59.

Comment O4-67 Response: The Exhibit B to Comment Letter O4 cited pages and photos by the commenter do not support the statements in this comment regarding skyglow, light from the campus, or people at the Rio Americano wetland/lagoon area at midnight. Nonetheless, such statements would suggest existing conditions include existing light levels greater that are not intrinsically dark and use of the American River Parkway by people outside of open hours. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-68 Response: The commenter does not make a clear connection between the prior stated information and the Draft EIR presentation of the existing environmental setting at and surrounding the project site. See above responses to Comments O4-65 though O4-67.

Comment O4-69 Response: See responses to Comments O4B-69 through O4B-71. As stated under Impact 4.2-5 in the Draft EIR (pages 4.2-25 through 4.2-26), no trees would be removed as part of the proposed project. Furthermore, project implementation would adhere to the measures described under Impact 4.2-5 to protect native trees with driplines. Finally, please see Master Response 10: Project Description for a detailed explanation on why the District's previous stadium improvements project that it approved in 2010 but ultimately did not construct is not relevant to the proposed project or this EIR's analyses.

Comment O4-70 Response: As stated on page 4.2-2 of the Draft EIR, the row of trees bordering the football field includes eucalyptus and valley oak. The proposed project does not

include removal of any of these trees and would also include measures to protect native trees, including valley oaks, from impacts (pages 4.2-25 and 4.2-26 of the Draft EIR). See responses to Comments O4B-9, O4B-69, and O4B-123 regarding consideration of this row of trees in the Draft EIR evaluation of proposed project impacts on biological resources. The District did not rely on preservation of these trees in the Draft EIR analysis.

Comment O4-71 Response: See responses to Comments O4B-71 through O4B-73.

Comment O4-72 Response: The Draft EIR analysis included consideration of potential impacts on bats, bat roosting habitat, and bat foraging habitat. The Draft EIR evaluates the change that would occur from increased nighttime activity as compared to existing conditions. See also response to comment OB4-71 and Master Response 2 for additional details regarding the Draft EIR's evaluation of operational noise impacts on bats.

Comment O4-73 Response: The analysis is not predicated on seasonality. The analysis recognizes that the stadium would be used most of the school year and potentially during summer. However, the statement about "mostly in the non-nesting season" is emphasizing that the analysis also acknowledges that the stadium is currently utilized, as expressed in the commenter's statements in Comment O4-67 of the bulleted list, noting existing lighting from surrounding development, and reflected in Table 3-1. Als, as described in Chapter 3, "Project Description," of the DIER, the primary new uses would be football games, and school assemblies and other school-sanctioned events; while existing events that already take place at Raider Stadium may shift in time due to the availability of improved lighting.

Comment O4-74 Response: The commenter's statement that the biological resources impact evaluation in the Draft EIR treats indirect lighting and operational-noise effects as less than significant or nonexistent" is baseless and disregards the majority of the analysis presented in Section 4.2, "Biological Resources," of the Draft EIR. Draft EIR Section 4.2, "Biological Resources" (pages 4.2-18 through 4.2-21), separately evaluates how increased nighttime lighting and operational noise could affect wildlife within the American River Parkway, including nesting and migratory birds. The biological resources analysis considers the timing and frequency of stadium events, including events during migration season, predicted lighting levels within Parkway habitat, and the duration and magnitude of increased noise exposure. Based on these considerations, the Draft EIR concludes that operational lighting and noise impacts on biological resources would be less than significant. With regard to the significance determination for noise relative to standards established for the human environment and disturbance (Section 4.3, "Noise and Vibration") and that of potential impacts of noise on biological resources (Section 4.2, "Biological Resource), Draft EIR Section 4.2, "Biological Resources" (pages 4.2-18 through 4.2-21), separately evaluates how increased nighttime lighting and operational noise could affect wildlife within the American River Parkway, including nesting and migratory birds. The biological resources analysis considers the timing and frequency of stadium events, including events during migration season, predicted lighting levels within Parkway habitat, and the duration and magnitude of increased noise exposure. Based on these considerations, the Draft EIR concludes that operational lighting and noise impacts on biological resources would be less than significant. The

commenter also notes the proposed lighting's Kelvin rating, but does not provide any evidence as to how the Draft EIR is inadequate in it's evaluation of potential biological resources impacts associated with such proposed lighting. See also response to Comment O4-73.

Comment O4-75 Response: See response to Comment O4B-86 with regard to ambient noise measurements taken, response to Comment 04C-11 with regard to reference game-period noise measurements, and O4B-89 regarding the numerous ways that noise impacts wildlife and the use of A-weighted decibels. Regarding the reference game attendance, the estimate of 3,000 was rounded conservatively and is slightly lower than the actual attendance, which, as provided by the District based on ticket sales and non-ticketed attendees and shown in Attachment A to the VMT analysis, was about 3,397. The commenter's note that the Draft EIR text identifies 3,000 as greater than the proposed project capacity, that is correct in reference to the proposed seated capacity. Regardless, the analysis utilized the reference game noise measurements, which hosted approximately 3,397 (or nearly 3,400) attendees, which is consistent with the peak-attendance event scenario identified under the Draft EIR.

Comment O4-76 Response: Regarding the Draft EIR's analysis of lighting impacts, including light trespass, and skyglow and glare, please see Master Response 2: Nighttime Lighting and Glare and Noise Impacts on Wildlife. Please also see Draft EIR Mitigation Measure 4.1-2, which requires the District to 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 must 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 would not be allowed to commence until the design receives the "pass" rating and approval letter. Furthermore, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. As is clear in the evaluation of potential impacts in Section 4.1, "Biological Resources," of the Draft EIR, including the environmental setting and impact analysis, the off-site habitat including the American River Parkway is evaluated for existing conditions and for the project's potential to result in significant impacts on this off-site habitat, as the commenter suggests is necessary. The Parkway and related habitat and wildlife are discussed on every page of the biological resources environmental setting (Draft EIR pages 4.2-1 through 4.2-10) and are evaluated comprehensively in the biological resources impact analysis. See also Master Response 2 regarding the how the Draft EIR did evaluate the frequency, timing, magnitude, and effects of the proposed project on wildlife using with the Parkway corridor.

Comment O4-77 Response: Please see responses to Comments O4B-62 through O4B-66, O4B-84, and O4B-24.

Comment O4-78 Response: Please see responses to Comments O4B-96 and O4B-97.

Comment O4-79 Response: The commenter points to a single incident of a nest being established on the artificial turn immediately after it was improved to the artificial material. This

incident does not suggest that artificial turf and the existing stadium is suitable habitat for nesting birds, nor does a cited singular incident suggest that ground nesting in the artificial turn is a likely occurrence. The observation of a juvenile red-tailed hawk "calling nonstop" from a redwood tree does not necessarily indicate nesting activity. Juvenile hawks often remain in the vicinity of their natal area after fledging, using trees for perching, hunting, or resting. Vocalizations by juveniles are common and typically reflect begging behavior or communication with adults, rather than evidence of active nesting. Importantly, the Draft EIR acknowledges the project site's proximity to the American River Parkway, which provides extensive, high-quality habitat for raptors and other wildlife. The presence of a juvenile hawk on campus is consistent with the species' use of the broader Parkway corridor for foraging and dispersal, rather than indicating that the campus itself is important nesting habitat. The Draft EIR and its biological resources assessment considered the presence of trees and potential for raptor nesting, and included standard mitigation measures to avoid impacts to nesting birds, including pre-construction surveys and avoidance buffers if active nests are detected. Mitigation Measure 4.2-1a is proposed in the Draft EIR to address potential impacts associated with project construction. As operational impacts are determined to be less than significant, no mitigation is required. With regard to the commenter's suggested "nesting-bird protections" and asserted inadequacies of the Draft EIR Mitigation Measure 4.2-1e, please see responses to comments O4B-118.

Comment O4-80 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. In addition, Draft EIR Section 4.2, "Biological Resources," evaluates potential impacts based on existing habitat conditions and species with potential to occur, regardless of jurisdictional boundaries. The analysis considers both the levee and adjacent Parkway habitat and does not exclude potential effects on biological resources based on whether the levee is considered part of the Parkway.

Comment O4-81 Response: This comment quotes a comment on the Draft EIR NOP provided by Sacramento County Parks Department. The District received the NOP comment letter from the Sacramento County Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the County Parks letter is provided in Draft EIR Appendix A. The Sacramento County Parks Department did not submit any comment letter on the Draft EIR. Each topic area raised in the quoted text, including reference to the American River Parkway Plan, asserted impacts to aesthetic and biological resources, cumulative effects, and suggested alternatives were considered in the drafting of the Draft EIR and addressed throughout the Draft EIR, including Draft EIR Sections 4.1, 4.2, 5.9, Chapter 6 and Section 7.1, which evaluate potential effects on Parkway scenic resources, biological resources, consistency with applicable land use plans and policies, alternatives to the proposed project, and cumulative impacts, respectively. The comment refers to the Sacramento County Parks NOP comment letter contents as "the agency's findings." Under the California Environmental Quality Act (CEQA) Guidelines (§15082 and §15083), the purpose of the NOP and scoping process is to solicit input from agencies and the public regarding the scope and content of the environmental analysis to be included in the Draft EIR. Comments received during this phase are intended to inform the preparation of the EIR, but they do not constitute "findings" under

CEQA, nor do they represent formal determinations of impact significance. This comment does not further expand up on or make any direct independent statements on the adequacy of the environmental analysis contained in the Draft EIR. Please also see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, as well as responses to Comments O4B-20 through O4B-30, O4B-36, O4B-38, and O4B-50.

Comment O4-82 Response: Please see responses to Comments O4B-1 through O4B-154 regarding the conclusions and input of Dr. Smallwood, as presented in this Exhibit B to the commenter's letter.

Comment O4-83 Response: Please see response to comments O4B-1 through O4B-92, particularly Comment-O4B-81, with regard to characterization of the existing setting. Please see also Master Response 2: Nighttime Lighting and Glare and Noise Impacts on Wildlife.

Comment O4-84 Response: Please see Master Response 2: Nighttime Lighting and Glare and Noise Impacts on Wildlife.

Comment O4-85 Response: Please see response to Comments O4B-112.

Comment O4-86 Response: Please see responses to Comments O4B-115 through O4B-117.

Comment O4-87 Response: Please see responses to Comments O4-75, O8-18, and Master Response 2: Nighttime Lighting and Glare and Noise Impacts on Wildlife.

Comment O4-88 Response: Please see response to Comment O4B-121.

Comment O4-89 Response: Please see responses to Comments O4B-122. O4C-20, and Master Response 2: Nighttime Lighting and Glare and Noise Impacts on Wildlife.

Comment O4-90 Response: Please see response to Comment O4B-123.

Comment O4-91 Response: Please see response to Comment O4B-124.

Comment O4-92 Response: Please see response to Comments O4B-125, O4B-126, and O4B-127.

Comment O4-93 Response: Draft EIR Section 4.2 ("Biological Resources") and Attachment C (Biological Resources Assessment) provide detailed information regarding the biological study area and field-survey boundaries. The Draft EIR clearly explains the extent of the study area, which encompasses the project site, adjacent school grounds, and relevant portions of the American River Parkway where potential direct or indirect impacts could occur. The boundaries were established based on the location of proposed improvements, proximity to sensitive habitats, and the potential for project-related effects to extend beyond the immediate site. The commenter does not provide explanation as to how this is in adequate in the Draft EIR nor how it would affect the determination of significance. No changes to the Draft EIR are necessary.

Comment O4-94 Response: Please see response to Comments O4-94 and O4B-04.

Comment O4-95 Response: Please see response to Comments O4B-3 and O4B-65.

Comment O4-96 Response: Please see responses to Comments O4B-99 through O4B-101 and Master Response 9: Cumulative Impacts.

Comment O4-97 Response: Please see responses to Comments O4-65 through O4-96. For the reasons stated therein, no changes to the Draft EIR determinations of significance are applicable and no new mitigation is necessary.

Comment O4-98 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-99 Response: With regard to the commenters quoted conclusion of the Exhibit C to this comment letter, please see response to Comment O4C-25. With regard to the operational noise analysis methodology, see response to Comment O4C-11.

Comment O4-100 Response: Please see responses to Comments O4C-6 and O4C-7.

Comment O4-101 Response: The commenter's quoted text from the Draft EIR is correct, but is not internally inconsistent. Rather the quotes are taken out of context and each is discussion a different point. The air quality distance of 50 feet is relative to the stadium itself, but then goes on to explain (as quoted by the commenter) that equipment itself would be 150 feet or more from said residence. Similarly, the text in the Draft EIR explains what vibration levels could be of large construction equipment, and applies the edge of the stadium (50 feet, the same as the distance referenced in the air quality analysis and quoted by the commenter) as a conservative reference distance in order to demonstrate that, even at this distance, impacts would be less than significant.

Comment O4-102 Response: See response to Comment O4C-7.

Comment O4-103 Response: Extending noise measurements after 10 p.m. simply because a game under the proposed project could extend past 10 p.m. is not necessary. The noise monitoring of the game is intended to capture reference game-time noise levels, which is what is accomplished by monitoring during the actual event game period.

Comment O4-104 Response: The Draft EIR discussion of thresholds of significance for the noise analysis (pages 4.3-15 and 4.3-16), as pointed to by the commenter, describes the transportation and non-transportation noise source thresholds that the District is applying to the analysis, specifically those identified by the County in Policy NO-1, NO-9, and NO-6. The Draft EIR further identifies the consideration of the Federal Interagency Committee on Noise guidance as well. These policies and standards all identify a the level of increase in noise (e.g., +5 dB or +3 dB) from ambient conditions, which is consistent with the analysis presented in the DIER impact evaluation of noise (DIER pages 4.3-16 through 4.3-27). See also, responses to Comments O4C-8 and O4C-9. Note that the commenter is applying bright-line dBA thresholds rather than the incremental increase in noise levels relative to ambient conditions that the Draft EIR noise analysis describes. Nonetheless, the impact determination is consistent, as the Draft EIR noise

analysis found construction and operational noise from the proposed project to be significant and unavoidable.

Comment O4-105 Response: Evening events are scheduled and would continue to be scheduled to end before 10:00 p.m., and most events would end earlier than this. Only five to eight evenings during the year, the District anticipates the ability under the proposed project to shift football games from their current off-campus location to the campus. As noted in the Draft EIR, most activities using the facilities would continue to end by or before 9:00 p.m. Mitigation Measure 4.3-1b requires a redesigned public address system, that, compared to the existing public address system, would reduce noise for adjoining properties. This mitigation measure also requires the public address system to include the ability for zone control in order to turn off speaker groupings that are unnecessary for different on-site activities. The mitigation also requires testing in order to ensure that the public address system noise is within the performance standards stipulated by the mitigation measure. As noted, Mitigation Measure 4.3-1b also requires events to be scheduled to end by 10:00 p.m., and prohibits use of the public address system, amplified music, and band activity after 10:00 p.m., prohibits the use of noisemakers, requires posting of instructions to keep noise to a minimum, and requires noise-reducing design and material treatments to the bleachers. As acknowledged in the Draft EIR, the mitigation measures required will reduce noise, including in the possible, though very uncommon instance where competition would require overtime play and could extend past 10:00 p.m. 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.; and bleacher/ramp noise reduction features. Because some residences are located close to the high school campus, and because crowd noise, bleacher activity, and certain event-related sound sources cannot be fully controlled through feasible mitigation, event noise may continue to result in substantial temporary and periodic increases above ambient evening conditions. The Draft EIR appropriately considered this impact to be significant and unavoidable (Draft EIR, page 4.3-27). Sacramento County Code Section 6.68.090 exempts from the Noise Ordinance, "[s]chool bands, school athletic and school entertainment events."

Comment O4-106 Response: See the response to Comment O4-105. Mitigation required by the Draft EIR for periodic noise associated with a few activities that could be shifted to Rio Americano that do not currently occur at the campus is focused on design and operational elements that are possible for the District and the high school to influence. As noted in the Draft EIR and throughout this FEIR, it is not possible for the District or the high school to exert total control over vocalizations of attendees at events that could be hosted on campus under the proposed project. As detailed throughout the Draft EIR, the County's non-transportation noise standard for nighttime noise affecting noise-sensitive outdoor areas is 70 dBA Lmax for residential receiving land uses (Draft EIR, page 4.3-13, https://landuse.saccounty.gov/gp/no/). Sacramento County Code Section 6.68.090 exempts from the Noise Ordinance, "[s]chool bands, school athletic and school entertainment events." The public address system testing and performance standard part of Mitigation Measure 4.3-1b ensures that noise attributable to the

public address system is consistent with the performance standard. The Draft EIR includes noise monitoring data, as referenced in the comment, along with anticipated event attendance and duration, and other relevant details. The District does not anticipate any especially low-frequence noise based on the details of activities that could shift to the campus under the proposed project. All anticipated activities, types of activities, normal and out of the ordinary hours of use (such as the very infrequent possibility of overtime play), non-athletic events, band activity, clean up, departures, and other relevant details are described throughout the Draft EIR (in particular, see Draft EIR pages 3-4 through 3-10).

Comment O4-107 Response: The Draft EIR evaluates project-related traffic noise using both average daily and peak-hour conditions, consistent with accepted CEQA practice. As described in Draft EIR Section 4.3, the County's +1 dB threshold is intended to apply to long-term ambient noise conditions, which are most relevant for assessing permanent changes in community noise exposure and land use compatibility. The Draft EIR reports that, for average daily traffic, the project would result in increases of only 0.1 to 0.3 dB, which is well below the +1 dB threshold. While the Draft EIR acknowledges that peak-hour event traffic could result in temporary noise increases of up to 1.7 dB (typical event) or 2 dB (peak event), these conditions are short-term and intermittent, occurring only during event departures rather than as a sustained or recurring ambient condition. The County's noise policies and thresholds are designed to protect residents from ongoing, chronic increases in noise, not brief surges associated with occasional special events. The Draft EIR does not "set aside" the peak-hour exceedance, but rather explains its context and why it does not represent a significant impact under the applicable standards. The analysis is consistent with the intent of the Sacramento County General Plan and CEQA, and no further mitigation is warranted for these temporary, event-related noise increases.

Comment O4-108 Response: Please see responses to Comments O4C-14 and O4C-15.

Comment O4-109 Response: Please see responses to Comments O4C-13 and O4C-16. As described therein, bleacher-related noise was evaluated. The comments on the NOP that the commenter identified were received by the District and considered in the preparation of the Draft EIR and included in Attachment A to the Draft EIR.

Comment O4-110 Response: Please see responses to Comments O4C-16 through O4C-24.

Comment O4-111 Response: See response to Comment O4-112. See also, Master Response 4: Mitigation.

Comment O4-112 Response: Regarding the commenter's suggested mitigation of a total-event noise standard at the nearest residential property line equal to the County standards the Draft EIR adopts (70 dBA Lmax before 10:00 p.m. and 65 dBA Lmax after), verified by monitoring during actual events, Draft EIR Mitigation Measure 4.3-1b establishes a maximum public address system noise level of 70 dBA Lmax, with additional controls required if this standard is exceeded. The Draft EIR also requires post-installation testing and adjustment of the public address system to ensure compliance.

Regarding the commenter's suggested mitigation of remote noise monitoring with public reporting and automatic alerts, see response to Comment O4C-28.

Regarding the commenter's suggested mitigation of damping of the bleacher decks and seats, Mitigation Measure 4.3-1b, which requires the Project's bleacher design to include noise-reducing features for ramps, platforms, or other walking surfaces. Clarifying edits are made to Mitigation Measure 4.3-1b to specifically mention that noise-reducing features may include sound-deadening treatment on the underside of seating and floorboards, as shown in Chapter 3, "Errata", of this Final EIR.

Regarding the commenter's suggested mitigation of damping of absorptive walls at the bleachers; see response to Comment O4C-24. In addition, Mitigation Measure 4.3-1b has been refined to add additional details consistent with the comment. These edits are reflected in Chapter 3, "Errata," to this Final EIR.

Regarding the commenter's suggested mitigation of firm attendance and event limits, Mitigation Measure 4.4-3c has been refined to make clear that maximum attendance at events as a result of the proposed project shall be limited to 3,400, consistent with the maximum attendance scenario evaluated in this EIR.

Regarding the commenter's suggested mitigation of earlier hard curfews; please see Master Response 8: Alternatives.

Regarding the commenter's suggested mitigation of limits on amplified sound, bands, and PA output, speaker orientation or relocation, and post-installation nighttime testing during representative events, EIR Mitigation Measure 4.3-1b includes restrictions on amplified sound, band activity, and public address system operation, including curfews and use limitations, as well as public address system testing.

Regarding the commenter's suggested mitigation of a documented complaint-response process; and corrective-action thresholds that require additional controls when measured noise exceeds the standard, commitment to implementation of each mitigation measure and compliance monitoring is done through the Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if and when the District certifies the EIR. However, additional monitoring and corrective action, outside of those items identified in Mitigation Measure 4.3-1b such as artificial noisemaker prohibition, would be infeasible; for example, it is not realistic for the District to suggest that it could feasibly avoid any bleacher noise, crowd cheering, or similar noise sources and, therefore, has not suggested such in the proposed mitigation. For these reasons, and as disclosed in the Draft EIR (page 4.3-27) Impact 4.3-1 is found to be significant and unavoidable. Should the District certify the Final EIR and approve the project, in accordance with California Public Resources Code Section 21081.6, the Environmental Mitigation Monitoring and Reporting Program prepared in conjunction with this Final EIR provides for the monitoring of mitigation measures, including Mitigation Measure 4.3-1b, as set forth in this Final EIR. The intent of the Mitigation Monitoring and Reporting Program is to ensure the effective implementation and enforcement of adopted mitigation measures, as suggested by the commenter and consistent with requirements of CEQA Guidelines Section 15126.4 subd. [a][1][B].

The suggested measures, such as setting numeric event noise limits, requiring pre-opening nighttime commissioning, ongoing monitoring, complaint protocols, and mandatory operational reductions, would not reduce the impact to less than significant, as the primary source of noise is the nature and scale of the event itself. In addition, many of the suggested measures (e.g., reducing attendance or prohibiting band activity) would fundamentally alter the project's purpose and are not considered feasible mitigation under CEQA (See Master Response 8: Alternatives).

Comment O4-113 Response: Mitigation Measure 4.3-1a has been revised, as shown in Chapter 3, "Errata," of this Final EIR to narrow the allowable construction hours to align with that identified in the Project Description.

Comment O4-114 Response: The equipment is listed in the Draft EIR Project Description (page 3-10). Mitigation Measure 4.3-1a includes a limit of a 150-foot setback to ensure that such equipment is not placed nearer, since the 150-foot distance is reflective of the proposed construction area but is not at the school boundaries; this is just a precautionary measure to ensure the assumed setback to adhered to. With regard to any "equipment controls" adopted in 2010 by the District, please see Master Response 10: Project Description for a detailed explanation on why the District's previous stadium improvements project that it approved in 2010 but ultimately did not construct is not relevant to the proposed project or this EIR's analyses.

Comment O4-115 Response: The comment summarizes various data points from the LTA attached to the Draft EIR. Regarding the queuing conditions that could occur under various event attendance scenarios, under Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), automobile delay, as measured by LOS or similar measures of vehicular capacity or congestion, is not a significant environmental impact. The intersection delay and queuing analysis in the *Local Transportation Analysis* is used to identify operational conditions that could create hazards, such as vehicle queues spilling into through lanes, bike lanes, or crosswalks, or blocking emergency access. Those are the conditions Mitigation Measures 4.4-3a through 4.4-3c address. Comments about delay or LOS by themselves do not identify a significant impact under CEQA. With regard to the "Draft" watermark on the LTA, see response to Comment O4-52.

Comment O4-116 Response: As detailed in the Draft EIR (pages 4.4-16 and 4.4-17), 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. 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. See also Master Response 5: Trip Generation and Vehicle Miles Traveled.

Comment O4-117 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled, Master Response 6: Parking Availability, and responses to Comments O4D-25 through O4D-28. Furthermore, implementation of Measure 4.4-3a would reduce

the potential for queuing since some attendees would instead turn into Jesuit High School before reaching this intersection to make use of overflow parking to be provided at Jesuit for a peak-attendance event. 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. The operational impact related to event parking, bicycle and pedestrian safety, vehicle circulation, and queuing was determined to be less than significant. The Draft EIR Project Description provide Table 3-1 and a written summary of the existing and anticipated new events that would occur, including frequency and estimated attendance ranges. See also Master Response 10: Accurate, Stable, and Finite Project Description.

In order to further ensure that traffic and circulation conditions as a result of the proposed project would not be greater than as evaluated under this EIR, the District has modified Mitigation Measure 4.4-3c to include a maximum event attendance of 3,400, as shown in Chapter 3, "Errata," to this Final EIR.

Comment O4-118 Response: See Master Response 6: Parking Availability.

Comment O4-119 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled. With regard to whole-school assemblies during or immediately following school hours, these events would include the students already at the campus for school and would not influence a change in traffic or parking around the school pick-up hours, as these students would need to leave campus by their typical means of transportation regardless of any such event; the proposed project itself is not drawing attendees to the school in this case.

Comment O4-120 Response: This comment summarizes the work of a consultant that prepared Exhibit E attached to this comment letter. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-121 Response: With regard to whole-school assemblies during or immediately following school hours, these events would include the students already at the campus for school and would not influence a change in traffic or parking around the school pick-up hours, as these students would need to leave campus by their typical means of transportation regardless of any such event; the proposed project itself is not drawing attendees to the school in this case.

Comment O4-122 Response: Please see response to Comment O4D-27, and O4D-30 through O4D-34.

Comment O4-123 Response: Please see Master Response 6: Parking Availability of O4D-47.

Comment O4-124 Response: Mitigation at this location is not limited to crosswalk markings. Mitigation Measure 4.4-3b requires designated crossings with treatments, which may include nighttime lighting, warning signs, and advance yield or stop lines, plus event staff where conflicts are expected. Mitigation Measure 4.4-3c requires staffed traffic control. Please refer also to Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O4-125 Response: The Draft EIR evaluates emergency access based on the existing street grid, established emergency response protocols, and project design features, as detailed in Section 4.8 (Hazards and Hazardous Materials) and Section 4.13 (Transportation). The project site is served by multiple access points and public streets, and the proposed improvements do not alter or restrict emergency access routes. The Draft EIR includes standard mitigation requiring ongoing coordination with Sacramento County Sheriff, Fire, and other relevant agencies during final design and event planning, consistent with CEQA's requirement to identify and implement feasible mitigation. Please refer also to Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O4-126 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled and Master Response 10: Accurate, Stable, and Finite Project Description. In addition, as noted in Master Response 10, while graduation was originally considered in the development of the proposed project operating scenario to accommodate 3,500 attendees, further discussion and reflection upon available bleacher and field seating resulted in a slight refinement of this maximum event capacity to 3,400; this aligns with the maximum football game attendance scenario and the basis of analysis applied throughout the Draft EIR, including for Transportation, as well as the is within the capacity of the fire and life-safety requirements for design review and approval by DSA. Master Response 10 confirms that 3,400 attendees is the intended estimate and identifies a corresponding correction to Mitigation Measure 4.4-3c to implement this limit, as also reflected in Chapter 3, "Errata," to this Final EIR.

Comment O4-127 Response: See response to Comment O4D-39 and Master Response 5: Trip Generation and Vehicle Miles Traveled.

Comment O4-128 Response: See Master Response 5: Trip Generation and Vehicle Miles Traveled.

Comment O4-129 Response: Please see response to comment I47-5 with regard to the consistency of the Draft EIR evaluation of operations. The various data points identified by the commenter are taken out of context of the Draft EIR and do not inherently conflict. For example the data points associated with the air quality analysis (those in sections 5.2 and 7 and Appendix G of the Draft EIR) were prepared to apply what are intermittent event trip rate and travel distance estimates to annual modeling using the California Emissions Estimator Model; in addition, in order to ensure that localized emissions associated with travel to the project site, regardless of regional VMT benefits were captured, the air quality analysis did not directly apply the same VMT data as the LTA and VMT analyses. Similarly, analyses such a biological resources and noise took into consideration the shifting of existing events in time (such as to later hours of the day, which could be accommodated under the proposed project due to improved lighting); this shift

is important to these resource areas and such events are therefore noted in the data points, but do not directly influence *new* trips and VMT under the proposed project, and therefore are not applicable to the LTA and VMT analysis.

In addition, with regard to the maximum operational scenario, Draft EIR Chapter 3, "Project Description," defines the proposed project components and the range of existing and future activity types and scales (i.e., number of attendees that may attend various events) that would occur with implementation of the proposed project. The EIR appropriately evaluates multiple scenarios of operational scales, reflective of the range of activities that would be accommodated by implementation of the proposed project. There is not one maximum operating scenario. Rather, there are existing activities hosted under current conditions at the high school campus – both practices and competitions. The Draft EIR provides a detailed accounting of the existing conditions, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares the existing conditions to what would occur under the proposed project. Relative to a maximum operating scenario, the Draft EIR summarizes conservative assumptions that were used for analysis throughout the document. As noted, due to inadequate sports lighting and capacity, Rio Americano is currently unable to host home football games and graduation ceremonies, which represent the anticipated highest attendance events. While most home football games that could be hosted at Rio Americano high school in the future are not anticipated to be among the highest attendance events, and would be anticipated to draw between 1,100 and 1,700 attendees, while the highest attendance events are conservatively assumed to have an attendance of up to 3,400. Where specific data was not available, such as future levels of attendance, the Draft EIR analysis used conservative assumptions. For example, while the typical home football game based on historical data would have an attendance of between 1,100 and 1,700, the transportation analysis supporting the Draft EIR instead assumed that the typical home football game attendance would be 2,200 (Draft EIR, page 4,4-12). Regarding the commenter's suggestion that a maximum operating scenario should be referenced in every Draft EIR chapter, for many sections of the Draft EIR, the peak event is not relevant to the impacts. For example, with respect to biological resources, cultural resources, and tribal cultural resources, most impacts would be related to the trenching for electricity, the three-foot-diameter holes for the four new stadium light poles, and the extent of site clearing, and other construction details. The analysis presented in the Draft EIR evaluates not just the periodic higher attendance events at the campus, but also construction-related effects and the more routine use of the facilities in order ensure a comprehensive depiction of both the existing conditions and the incremental impacts of the proposed project.

Mitigation Measure 4.4-3b requires implementation of event transportation management strategies, which would include designation of parking locations and pedestrian routes, staffing and signage to direct attendees, designation of ingress and egress routes, procedures for managing concentrated post-event departures, and adaptive management to adjust as conditions warrant. Feasible mitigation is included for the anticipated period higher attendance activities accommodated by the proposed project. Furthermore, while graduation was originally considered in the development of the proposed project operating

scenario to accommodate 3,500 attendees, further discussion and reflection upon available bleacher and field seating resulted in a slight refinement of this maximum event capacity to 3,400; this aligns with the maximum football game attendance scenario and the basis of analysis applied throughout the Draft EIR, including for Transportation, as well as the is within the capacity of the fire and life-safety requirements for design review and approval by DSA. Master Response 10 confirms that 3,400 attendees is the intended estimate and identifies a corresponding correction to Table 3-1 and to Mitigation Measure 4.4-3c to implement this limit, as also reflected in Chapter 3, "Errata," to this Final EIR. The Draft EIR analyzed all potential impacts based on the 3,400 attendee-figure for the purposes of consideration of peak-attendance events, such as graduation, as applicable; therefore, the EIR's analyses and significance determinations remain unchanged and no further revisions are needed apart from the aforementioned minor corrective typographical changes, which are reflected in the Errata contained in Chapter 3 of this Final EIR. For more on the stability of the project description, please also refer to Master Response 10: Project Description. No changes to the Draft EIR outside of the errata items identified in this response herein are necessary, and recirculation is not required.

Comment O4-130 Response: As suggested by the commenter, to ensure that attendance would be limited to that peak scenario evaluated in the EIR and expressed in the Draft EIR significance determination discussion for transportation and circulation, refinements to Mitigation Measure 4.4-3c have been identified to implement this limit as a mandatory, enforceable condition; these edits are reflected in Chapter 3, "Errata," to this Final EIR.

Comment O4-131 Response: It should be noted that the fire and medical response incidents identified by the commenter are unrelated to the proposed project, nor is there evidence that such incidents would increase as a result of the proposed project. Draft EIR Section 4.4, "Transportation and Circulation," evaluates potential safety impacts associated with increased event attendance, including emergency access under Impact 4.4-4. Draft EIR Section 5.7, "Hazards and Hazardous Materials," also evaluates potential interference with emergency response and evacuation. The proposed improvements would be subject to applicable design, occupancy, and fire and life-safety requirements before implementation. Please see Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation for additional discussion of applicable safety review requirements and stadium event management.

Comment O4-132 Response: Please see response to Comment O4D-3 and Master Response 6: Parking Availability regarding arrival routes and parking lot capacity and parking availability. Please see also response to Comment O4D-15 regarding the commenter's statement regarding recalculated VMT and Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance and associated VMT.

Comment O4-133 Response: Please see responses to Comments O4-115 through O4-132. For the reasons stated therein, no changes to the Draft EIR determinations of significance are applicable and no new mitigation is necessary.

Comment O4-134 Response: Please see Master Response 4: Mitigation and Master Response 6: Parking Availability. The commenter presents parking demand data points consistent with those identified in the Draft EIR; the Draft EIR does not suggest that all parking would be accommodated by on-site parking spaces. As suggested by the commenter, to ensure that attendance would be limited to that peak scenario evaluated in the EIR and expressed in the Draft EIR significance determination discussion for transportation and circulation, refinements to Mitigation Measure 4.4-3c have been identified to implement this limit as a mandatory, enforceable condition; these edits are reflected in Chapter 3, "Errata," to this Final EIR.

Comment O4-135 Response: As noted by the commenter, the inconvenience of parking is not itself an environmental impact under CEQA. (See *Save Our Access etc. v. Watershed Conservation Auth.* (2021) 68 Cal.App.5th 8, 24–25; *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 697.) Parking availability is an indicator of the use of off-site parking, such as available street parking, that may occur under various operational conditions (i.e., lower versus higher attended events); such use of street parking is considered under CEQA and in the Draft EIR in order to evaluate the potential for conflicts among pedestrians and motor vehicles and related safety. The Draft EIR identified this as a potentially significant impact, and proposed Mitigation Measures 4.4-3a: Update the Memorandum of Understanding with Jesuit High School for Shared Parking Use Agreement, Mitigation Measure 4.4-3b: Implement an Event Transportation Management Plan, and Mitigation Measure 4.4-3c: High-Capacity Event Access and Circulation Management (Draft EIR pages 4.4-15 and 4.4-16).).

The Draft EIR evaluates transportation impacts based on conflicts with plans and policies (Impact 4.4-1), VMT (Impact 4.4-2), hazards (Impact 4.4-3), and emergency access (Impact 4.4-4). The intersection delay and queuing analysis in Draft EIR Appendix E, "Local Transportation Analysis" is used to identify operational conditions that could create hazards, such as vehicle queues spilling into through lanes, bike lanes, or crosswalks, or blocking emergency access. Potential impacts, including hazards associated with transportation and circulation are addressed by mitigation measures throughout the Draft EIR, including Mitigation Measures 4.4-3a through 4.4-3c, include appropriate performance standards and identify the types of potential actions that can feasibly achieve such standards.

Comment O4-136 Response: The commenter is correct that there was a typographical error in the number of annual trips that informed the operational air quality and greenhouse gas analysis. However, the corrected annual trips do not change the significance conclusions of the air quality and greenhouse gas impact analyses. The corrected number of annual trips (29,894 one-way trips) is 4.4 times higher than the originally reported value (6,826 one-way trips). Applying this increase to the annual operational mobile source PM_{10} and $PM_{2.5}$ emissions results in 0.08 tons/year PM10 and 0.02 tons/year PM2.5, which are both still well below the Sacramento Air Quality Management District recommended thresholds of significance of 14.6 and 15 tons/year for PM_{10} and $PM_{2.5}$, respectively. Operational mobile source greenhouse gas emissions would increase from 18 metric tons of carbon dioxide equivalents to 79 metric tons of carbon dioxide equivalents, and total operational greenhouse gas emissions would be 81 metric

tons of carbon dioxide equivalents, still well below the Sacramento Air Quality Management District recommended threshold of significance of 1,100 metric tons of carbon dioxide equivalents. Therefore, this correction to the annual number of operational vehicle trips does not change the significance conclusions or result in new impacts. The corrected values are presented in Chapter 3, "Errata", of this Final EIR.

Comment O4-137 Response: As described in Draft EIR Chapter 3, "Project Description", 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. American River Drive, Saverien Drive, and the fire access lane are paved; therefore, vehicles accessing the project site would not travel on "dusty, dirt filled routes." The commenters reference to the NOP comment and statements around past incidences of construction fugitive dust are noted, but do not provide evidence that the Draft EIR evaluation of construction dust associated with the proposed project is insufficient.

As shown in Table 5.2-1 (Draft EIR page 5.2-5), maximum daily unmitigated PM_{10} emissions are estimated to be approximately 2 pounds per day, well below the Sacramento Metropolitan Air Quality Management District recommended threshold of significance of 80 pounds per day. Fugitive dust emissions of PM10 generated by vehicles on paved roads would be approximately 0.7 pounds per day as shown in Draft EIR Appendix G for maximum daily worker, vendor, and haul vehicle emissions on the maximum day of overlapping activities. Additionally, project construction would primarily be conducted on existing paved areas and ground disturbing activities that could generate fugitive dust emissions would be limited.

Additionally, as described in Impact 5.2-3, temporary construction activities would result in less than significant impacts related to exposure of sensitive receptors to toxic air contaminant concentrations due to the intermittent and short-term generation of emissions during construction, as well as the dispersive nature of PM2.5 emissions. As described on Draft EIR page 5.2-10, 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.

Therefore, the commenter's concerns about particulate matter emissions are appropriately addressed and no changes to the Draft EIR are required.

Comment O4-138 Response: The Project Description was updated since the NOP to clarify that no such structures would be demolished. As such the comments on the NOP from the California Department of Toxic Substances Control and Sacramento Metropolitan Air Quality Management District pertaining to hazardous materials associated with these structures and cited by the commenter were no longer applicable and not necessary to address in the Draft EIR. Furthermore, neither the California Department of Toxic Substances Control or Sacramento Metropolitan Air Quality Management District commented on the Draft EIR.

Comment O4-139 Response: The suggested analysis requested by the commenter—evaluation of water quality impacts associated with increased litter in the Parkway—is not physical

impacts on the environment from the proposed project. (See Preserve Poway v. City of Poway (2016) 245 Cal.App.4th 560, 578–579 [CEQA does not require an analysis of subjective social impacts].) The project site is situated on the Rio Americano High School campus and attendees at sports events are expected to stay on the high school campus, which is fenced. The District acknowledges that litter within the Parkway can have environmental effects. However, trespassing on the Parkway after dark (along with any associated illegal littering) would be a matter for County law enforcement. (See City of Hayward v. Trustees of Cal. State Univ. (2015) 242 Cal.App.4th 833, 843.).

Comment O4-140 Response: The CalEEMod run included in Appendix G of the Draft EIR, dated December 18, 2025, was included erroneously and was an older version of the emissions inputs and outputs. The correct version of the air quality appendix, which was prepared at the time of the Draft EIR analysis and informed the impact analysis, is attached to this Final EIR as Attachment E.

Comment O4-141 Response: The commenter's suggestion that the Draft EIR statements fuel would not be stored on site, equipment would be staged in paved areas, and the contractor would follow County general requirements for best management practices are not mitigation is accurate. Chapter 3, "Project Description" Exhibit 3-3 (Draft EIR page 3-5), clearly shows the limits of project-related work, which would be confined solely to the Rio Americano High School campus. The Draft EIR contains feasible mitigation measures, where necessary, to reduce potentially significant and significant impacts. Where impacts have been identified as less than significant (e.g., hydrology and water quality impacts evaluated on Draft EIR pages 5.8-27 through 5.8-29), no mitigation measures are required.

Comment O4-142 Response: The commenter does not provide any information or data that supports how the proposed project's construction emissions would result in health risks; the Draft EIR, as cited by the commenter, accounts for the project site location, proximity to sensitive receptors (including residences approximately 150 feet from construction), construction equipment type and duration of use, and finds potential air quality impacts associated with exposure of sensitive receptors to substantial pollutant concentrations to be less than significant. CEQA does not require a quantitative health risk assessment for every project. Instead, CEQA allows the lead agency to exercise technical expertise and discretion in determining the appropriate level of analysis, as long as substantial evidence supports the impact determination (CEQA Guidelines §15064, §15151). The Draft EIR provides substantial evidence—including emissions quantification, regulatory guidance, and expert judgment—supporting its conclusion that construction emissions would not expose sensitive receptors to substantial pollutant concentrations. CEQA does not require mitigation for impacts determined to be less than significant (CEQA Guidelines §15126.4(a)(3)). Since the Draft EIR concludes that construction-related air quality impacts are less than significant, additional mitigation measures are not warranted.

Comment O4-143 Response: The lease plans that the commenter references may provide specific technical details about the backup generator, such as its manufacturer (Generac), power rating (30 kilowatts), and installation location (on a new concrete pad). Whereas, the Draft EIR describes it in more general terms as a "backup generator." Both statements are accurate. This does not present a conflict. Please

see also Master Response 9: Cumulative Impacts for additional discussion of the cell tower.

Comment O4-144 Response: The proposed project would not involve any work within or immediately adjacent to the American River flood control north levee as shown in Draft EIR Exhibit 3-3 (Draft EIR page 3-5), and therefore no coordination with flood control agencies is necessary. The Draft EIR accurately describes the location of the project site relative to the U.S. Army Corps of Engineers flood-control levee and the 200-year floodplain. The nearest proposed light standard foundation is approximately 175 feet from the Parkway's northern edge, which is generally aligned with the levee toe. The actual distance from the landside toe of the levee to the nearest foundation exceeds regulatory setback requirements for flood control structures. The Draft EIR's geology and soils analysis (Section 4.6) evaluates the potential for unstable soils and ground disturbance and concludes that there would be no impact based on the distance from the levee, the nature of the proposed augered foundations, and compliance with standard construction practices. The project does not propose any work on or within the levee prism, nor does it involve excavation within the critical zone (typically 10 feet or more from the levee toe) that would trigger additional geotechnical or seepage analysis under CEQA or flood control regulations. The Draft EIR identifies all required discretionary approvals, including Division of the State Architect review, which encompasses structural and geotechnical safety for public school projects. In addition, any work within the jurisdiction of the Central Valley Flood Protection Board will be subject to their review and approval, as required by law. The project will comply with all applicable federal, state, and local regulations regarding flood control and levee protection. If Central Valley Flood Protection Board approval is determined to be required during final design, the District will obtain such approval prior to construction. Note that the Central Valley Flood Protection Board did not comment on the Draft EIR.

Comment O4-145 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-146 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-147 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances

and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094, and how the Project qualifies as a facility for educational purposes per the holding in *City of Santa Cruz v. Santa Cruz City Schools Bd. Of Education* (1989) 210 Cal.App.3d 1, as cited by the commenter.

Comment O4-148 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-149 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-150 Response: As explained in Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. Please also see Master Response 9: Cumulative Impacts for a discussion on why the District's 2010 approvals for a different RAHS stadium improvement project are no longer relevant or applicable here.

Comment O4-151 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. Please also see Master Response 9: Cumulative Impacts for a discussion on why the District's 2010 approvals for a different RAHS stadium improvement project are no longer relevant or applicable here.

Comment O4-152 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-153 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-154 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-155 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. In addition, there are no County grading, drainage, road, stormwater, access, or related approvals required for the Project.

Comment O4-156 Response: The text quoted by the commenter from the Draft EIR is taken out of context. Prior to this text, the Draft EIR is clear that "[b]ecause 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." Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use.

Comment O4-157 Response: As included in the text quoted by the commenter, the Draft EIR is clear that this point is provided for informational purposes and does not apply, particularly with the inclusion of the phrase, "if the County had jurisdiction." Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and response to comment O4-150. As explained therein, the District can and may choose to exempt the proposed Project from local zoning

ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094.

Comment O4-158 Response: The quoted text by the commenter is taken out of context but is accurate and does not imply any County jurisdiction or required approvals. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. Please also see Master Response 9: Cumulative Impacts for a discussion on why the District's 2010 approvals for a different RAHS stadium improvement project are no longer relevant or applicable here.

Comment O4-159 Response: As shown in Chapter 3, "Errata," to this FEIR, the typographical error identified by the words "No Impact" at the start of Impact 5.9-2 (Draft EIR page 5.9-29) have been replaced with the words "Less-than-Significant" to match the conclusion on Draft EIR page 5.9-30. The Draft EIR correctly states that the referenced standards apply to buildings, and the proposed project does not include any new buildings. As also correctly stated on Draft EIR page 5.9-30, the County zoning standards do not apply to the Rio Americano High School. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No additional changes to the Draft EIR are required.

As shown in Chapter 3, "Errata," to this FEIR, the typographical error identified by the words "section 4.2, 'Aesthetics'" on Draft EIR page 5.9-30, and "Section 3.1, 'Aesthetics'" on Draft EIR page 7-11, have been with the accurate text of "Section 4.1, "Aesthetics"'.

Comment O4-160 Response: The quoted text by the commenter is accurate but is taken out of context. The biological resources section of the Draft EIR does not apply the Parkway Plan policies; rather it acknowledges them and explains how the project does not conflict with them. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for a more detailed explanation on the scope and reach of the zoning exemption under Government Code, section 53094. Furthermore, as the Draft EIR explains, public schools and their related uses are permitted by right in the RD-4 zone that governs the Project Site.

Comment O4-161 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. As explained therein, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its

authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. In doing so, the District will produce requisite findings that show the Project's proposed uses are for educational purposes and programming. As Master Response 1 explains, the Project's improvements will facilitate and be used for used for physical education classes, interscholastic athletics, matriculation and graduation events, and other on-campus spirit activities. (Draft EIR, p. 3-10.) These activities and opportunities are integral to RAHS's programming and are a vital part of the free education that is constitutionally guaranteed to local citizens. (See *City of Santa Cruz v. Santa Cruz City School Bd. of Education* (1989) 210 Cal.App.3d 1, 4–9 [new stadium, sports field, and lights were exempt from local zoning because they served an important educational purpose that would be directly used for student instruction].) Therefore, the District may exempt the Project from local zoning as a facility directly used for educational purposes. (*Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist.* (2013) 215 Cal.App.4th 1013, 1061–1063 [affirming *Santa Cruz* to hold that "high school athletic stadium light is directly used for or related to the educational purposes of the high school and therefore should be considered part of classroom facilities that may be exempted from zoning laws pursuant to Government Code section 53094"].)

Comment O4-162 Response: As explained in Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, the District can and may choose to exempt the proposed Project from local zoning ordinances and regulations pursuant to its authority under Government Code, section 53094, subdivisions (a) and (b). The District will make that determination when it considers and renders a final decision on the Project and Final EIR. Please see Master Response 1 for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. Please also see Master Response 9: Cumulative Impacts for a discussion on why the District's 2010 approvals for a different RAHS stadium improvement project are no longer relevant or applicable here.

Comment O4-163 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for a more detailed explanation on the scope and reach of the District's zoning exemption authority under Section 53094. Please also see Master Response 1 for how this exemption extends to the land use plans that the County's zoning ordinance implements, including the American River Parkway Plan and the Urban American River Parkway Preservation Act. As Master Response 1 explains, both the ARPP and the UARPPA explain that they are inherently flexible in nature and not meant to supersede or override authority conferred to agencies by other statutory schemes, such as Government Code, section 53094. Please also see Master Response 1 and Draft EIR pages 5.9-29 to 5.9-30 for an analysis of how the Project does not conflict with any land use plans that were adopted to avoid or mitigate environmental impacts.

Comment O4-164 Response: The commenter asks that the EIR address potential lighting, glare, noise, and pedestrian activity impacts to the Parkway and the effects on Parkway recreationists. Please see Master Response 2: Nighttime Light and Glare Impacts

and Noise Impacts on Wildlife for more on the analyses p lighting and noise analyses and the methodologies used to support the EIR's determinations. As to the commenter's contentions about analyzing potential impacts to Parkway recreationist, please see Master Response 10: Accurate, Stable, and Finite Project Description for a discussion on how the EIR is focused on analyzing environmental, not social impacts. (See *National Parks and Conservation Association v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1359–1361 [rejecting claim that a visitor use and perception study was required to ascertain lighting impacts to visitors of a national park situated next to proposed landfill]; *Saltonstall v. City of Sacramento* (2015) 234 Cal.App.4th 549, 584–587 [crowd safety of downtown patrons near proposed basketball arena is not an environmental impact that must be analyzed in EIR].)

Comment O4-165 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use.

Comment O4-166 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, which explains how the District's exemption from local zoning pursuant to its authority under Government Code, section 53094, extends to land use plans that the underlying zoning implements, including the American River Parkway Plan and Public Resources Code, section 5842.

Comment O4-167 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use.

Comment O4-168 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife.

Comment O4-169 Response: Archaeological cultural resources, Tribal Cultural Resources, and human remains do not always fall into clear "categories" at the time of an unanticipated discovery. The mitigation measures called out by the commentor rely on flexibility to identify the most appropriate personnel and protocols based on the find. There are no inherent inconsistencies or conflicts to be resolved in the mitigation measure language.

Comment O4-170 Response: Minor revisions to the text on Draft EIR page 5.3-14 have been made in consideration of the comment.

Errata: Text on page 5.3-14 has been revised as shown in underline (new text) below (See Chapter 3, "Errata" of this Final EIR):

There has been no indication or evidence that the <u>project</u> area has been used for human burials.

Comment O4-171 Response: Minor revisions to the text on Draft EIR pages 5.3-12 through 5.3-14 have been made in consideration of the comment.

Errata: Text on page 5.3-13 has been revised as shown in underline (new text) below (See Chapter 3, "Errata" of this Final EIR):

Moreover, previous development and associated sub-surface excavation at the project site, including trenching at a depth of three and four feet and 18 inches wide for electrical, gas, water, and sewer lines for the buildings at the site, would further limit the likelihood of encountering buried cultural resources.

Errata: Text on page 5.3-14 has been revised as shown in underline (new text) and strikeout (deleted text) below (See Chapter 3, "Errata" of this Final EIR):

Mitigation Measure 5.3-~~1~~2 provides appropriate actions for inadvertent discovery of cultural resources (excluding human remains, which are addressed below). Implementation of Mitigation Measure 5.3-~~1~~2 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.

Errata: Text on page 4.5-12 has been revised as shown in underline (new text) and strikeout (deleted text) below (See Chapter 3, "Errata" of this Final EIR):

Mitigation Measure 4.5-1c:

- *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).*

Comment O4-172 Response: See responses to Comments O4-173 through O4-189.

Comment O4-173 Response: As explained in Master Response 9: Cumulative Impacts, the Draft EIR (Draft EIR) includes the approved Rio Americano High School Cell Tower project in its cumulative impacts analysis, consistent with CEQA Guidelines §§15130 and 15355. The Draft EIR's cumulative analysis (Section 7.1, Table 7-1) identifies the cell tower as a related project and considers its potential for incremental impacts in conjunction with the proposed stadium improvements.

The Draft EIR acknowledges that both the cell tower and the stadium light standards are of similar height and that the light standards would be visible from the Parkway. The cell tower, however, was reviewed and approved as a separate project and was found to be categorically exempt from CEQA. The Draft EIR's cumulative aesthetics analysis focuses on the incremental visual change from the proposed project when considered with other reasonably foreseeable projects. The addition of the cell tower does not result in a cumulatively considerable impact because the tower is a slender, unlit monopole, and its visual profile is distinct from the multiple, illuminated stadium light standards. The cumulative analysis considers the overall change to the visual environment, and the presence of one additional vertical structure of similar scale does not substantially alter the cumulative visual effect, especially given the existing urban and institutional context of the campus. The Draft EIR's cumulative aesthetics analysis is consistent with CEQA's direction to provide a practical and reasonable discussion of cumulative impacts, focusing on severity and likelihood rather than

duplicating detailed project-level analysis for each related project (CEQA Guidelines §15130(b)).

The cell tower project was determined to be categorically exempt from CEQA, and its approval included consideration of its limited footprint and lack of significant habitat disturbance. The Draft EIR's cumulative biological resources analysis appropriately focuses on projects with the potential to contribute to cumulative habitat or wildlife impacts. The small footprint and location of the cell tower, in a previously developed area of the campus, do not contribute to a cumulatively considerable impact on biological resources when considered with the stadium project.

The Draft EIR's cumulative noise analysis notes that the cell tower's only operational noise source is the backup generator, which would operate only during testing or power outages. Such use is infrequent and regulated by applicable noise ordinances. The generator's occasional operation does not, in combination with stadium activities, result in a cumulatively considerable noise impact. The Draft EIR's approach is consistent with CEQA's requirement to focus on substantial, ongoing, or chronic sources of noise rather than rare or emergency operations.

The Draft EIR concludes that the cell tower would have no effect on recreation at the American River Parkway. The tower is a passive, unmanned facility with no regular activity or public access, and its presence does not interfere with recreational use or enjoyment of the Parkway. This conclusion is supported by substantial evidence and is consistent with CEQA's requirement to focus on effects that are reasonably foreseeable and potentially significant.

The Draft EIR's cumulative analysis appropriately considers the cell tower project in accordance with CEQA requirements.

Comment O4-174 Response: Any previous project or environmental review is unrelated to the proposed project addressed in the Draft EIR and in this FEIR. The proposed project is detailed in Chapter 3 of the Draft EIR, and the direct and reasonably foreseeable effects of the proposed project are addressed comprehensively throughout Chapter 4 of the Draft EIR and in a cumulative context in Chapter 7 of the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4-175 Response: Section 15126.2(d) specifically requires an EIR to discuss the ways in which a project could foster economic or population growth, or the construction of additional housing, and how that growth could affect the environment. This section is often cited when discussing growth-inducing impacts, which are a required element of EIRs, separate from but related to cumulative impacts. This is not an erroneous citation, as asserted by the commenter.

The citation to "15216.2(b) in Section 7.4 of the Draft EIR is a typographical error that has been changed to "15126.2(b)", as shown in Chapter 3, "Errata," to this Final EIR. The content of the Draft EIR still appropriately addresses the requirements under CEQA and no additional changes are required as a result of this typographical error.

Comment O4-176 Response: The reference to Mitigation Measure 4.3-2 rather than Mitigation Measure 4.3-1b of the Draft EIR is a typographical error that has been changed to "4.3-1b" as no "Mitigation Measure 4.3-2" exists, as shown in Chapter 3, "Errata," to this Final EIR. The content of the Draft EIR still appropriately addresses the requirements under CEQA and no additional changes are required as a result of this typographical error.

The commenters point regarding noting that Draft EIR text states that the proposed project would not produce cumulatively considerable impacts, while also concluding that the proposed project's construction- and operational-noise contributions would be cumulatively considerable is taken out of context. Analysis on Draft EIR page 7-10 explains that "b]ecause 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." Nonetheless, as a conservative approach, the Draft EIR finds the cumulative impact to be cumulatively significant and unavoidable because the project-level impact is such. No changes to the Draft EIR are required.

The incorrect acronym definition of "IDA" for Table 7-1 has been changed to "International Dark-Sky Association (also known as DarkSky International)", as shown in Chapter 3, "Errata," to this Final EIR.

Comment O4-177 Response: Chapter 7, "Cumulative Impacts and Other CEQA Considerations," of the Draft EIR provides a comprehensive analysis of cumulative impacts associated with each resources area. Please see responses to Comments O4-1 through O4-176, to address the range of comments raised based on each of the commenter's referenced exhibits provided as attachments to this comment letter.

Comment O4-178 Response: Chapter 7, "Cumulative Impacts and Other CEQA Considerations," of the Draft EIR provides a comprehensive analysis of cumulative impacts associated with each resources area, including visual resources. This comment generally states what is to be evaluated, which has been done through Draft EIR chapter 7, and does not specific what is lacking in analysis or substantial evidence in the Draft EIR. Please see also response to Comment O4-173 and Master Response 9: Cumulative Impacts.

Comment O4-179 Response: Overlapping or sequential construction activities, including construction traffic, equipment noise, air emissions, interference with emergency access, drainage and erosion effects, fuel handling, and spill risk near the Parkway and levee are addressed in chapter 7, "Cumulative Impacts and Other CEQA Considerations," of the Draft EIR. This comment generally states what is to be evaluated, which has been done through Draft EIR chapter 7, and does not specific what is lacking in analysis or substantial evidence in the Draft EIR. Please see also response to Comment O4-173 and Master Response 9: Cumulative Impacts.

Comment O4-180 Response: Combined operational noise is addressed on page 7-10 of the Draft EIR. See also response to Comment O4-143. This comment generally states what is to be evaluated related to noise sources, which has been done through Draft EIR

chapter 7, and does not specific what is lacking in analysis or substantial evidence in the Draft EIR. Please see also response to Comment O4-173 and Master Response 9: Cumulative Impacts.

Comment O4-181 Response: Cumulative impacts on biological resources is addressed on pages 7-5 through 7-6 of the Draft EIR. This comment generally states what is to be evaluated, which has been done through Draft EIR chapter 7, and does not specific what is lacking in analysis or substantial evidence in the Draft EIR, so the District cannot address the request further. Please see also Master Response 9: Cumulative Impacts.

Comment O4-182 Response: Chapter 7, "Cumulative Impacts and Other CEQA Considerations," of the Draft EIR provides a comprehensive analysis of cumulative. This comment generally states what is to be evaluated, which has been done through Draft EIR chapter 7, and does not specific what is lacking in analysis or substantial evidence in the Draft EIR, so the District cannot address the request further. See Master Responses 9: Cumulative Impacts and 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use.

Comment O4-183 Response: The Draft EIR identified the required approvals for the proposed project; no approvals are required of Sacramento County, the Central Valley Flood Protection Board, the U.S. Army Corps of Engineers, or other agencies with jurisdiction over the levee, Parkway, drainage, access, or related resources. No additional analysis is required.

Comment O4-184 Response: Please see Master Response 9: Cumulative Impacts. The Draft EIR contains a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13). With regard to the 2018 DSA application, this was for previous maintenance and improvements to the existing fields, including the all-weather track and field, refurbished adjacent fields and courts, a new scoreboard, and renovated restrooms and concessions. This is unrelated to the proposed project and does not apply to the cumulative analysis under CEQA.

Comment O4-185 Response: These sports and activities mentioned by the commenter are accommodated at other facilities currently on the Rio Americano High School campus, and would remain at those facilities after implementation of the proposed project. External pedestrian circulation and neighborhood traffic is also a part of the existing conditions. These current operations and conditions are part of the existing (baseline) conditions described for each resource area and used to inform the project analyses through Chapters 4 and 5 of the Draft EIR. No further cumulative analysis of existing conditions is warranted.

Comment O4-186 Response: With regard to the 2010 EIR and related mitigation measures and operating conditions, and how they do not apply to this Draft EIR, please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O4-187 Response: Please see Master Response 9: Cumulative Impacts regarding the inclusion of Jesuit High School in the cumulative impacts analysis, which evaluates combined effects, as applicable, of both school and not only the proposed project in isolation. The commenter references the cumulative impact analysis related to

traffic presented on Draft EIR page 7-13. The traffic studies performed for the project (attached to the Draft EIR in Appendices E and F) are adequate and complete. Draft EIR Section 4.4, "Transportation and Circulation," includes feasible mitigation measures that would reduce the project's potentially significant impacts, as well as the project's cumulative traffic impacts, to a less-than-significant level. No changes to the Draft EIR are required.

Comment O4-188 Response: Please see Master Response 9: Cumulative Impacts.

Comment O4-189 Response: See Responses to Comments O4-172 through O4-188.

Comment O4-190 Response: All mitigation measures contained in the Draft EIR are specific, measurable, enforceable, and funding is available. The commenter's request that the District identify who is responsible for implementing each measure, when it must be completed, and how compliance will be verified will be contained a Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if and when the District certifies the EIR. Regarding the commenter's note that mitigation measures need to use the terms "shall" and "must," the applicable mitigation measures of the Draft EIR have been revised to use this terminology, rather than using the term "should." These edits are provided in Chapter 3, "Errata," of this Final EIR.

Comment O4-191 Response: See responses to Comments O4-63 and O4-64. For the reasons therein, no changes to Mitigation Measure 4.1-2 are required.

Comment O4-192 Response: See responses to Comment O4-139. For the reasons therein, no changes to Mitigation Measure 4.2-1b are required..

Comment O4-193 Response: See responses to Comment O4-79. For the reasons therein, no changes to Mitigation Measure 4.2-1e are required.

Comment O4-194 Response: See responses to Comments O4-113 and O4-114. As stated in O4-113, Mitigation Measure 4.3-1a has been revised, as shown in Chapter 3, "Errata," of this Final EIR to narrow the allowable construction hours to align with that identified in the Project Description and as suggested by the commenter.

Comment O4-195 Response: See response to Comment O4-112. Clarifying edits are made to Mitigation Measure 4.3-1b to specifically mention that noise-reducing features may include sound-deadening treatment on the underside of seating and floorboards, as shown in Chapter 3, "Errata", of this Final EIR.

Comment O4-196 Response: See responses to Comments O4-130 and O4-134. For the reasons therein, no changes to Mitigation Measure 4.4-3a are required. However, it should be noted that revisions to Mitigation Measure 4.4-3c have been incorporated into Chapter 3, "Errata," of this Final EIR to limit attendance to 3,400.

Comment O4-197 Response: See responses to Comment O4-124. For the reasons therein, no changes to Mitigation Measure 4.4-3b are required.

Comment O4-198 Response: All mitigation measures contained in the Draft EIR are specific, measurable, enforceable, and funding is available. The commenter's request that the District

identify who is responsible for implementing each measure, when it must be completed, and how compliance will be verified will be contained a Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if and when the District certifies the EIR. Regarding the commenter's note that mitigation measures need to use the terms "shall" and "must," the applicable mitigation measures of the Draft EIR have been revised to use this terminology, rather than using the term "should." These edits are provided in Chapter 3, "Errata," of this Final EIR. See also, response to Comment O4-47.

Comment O4-199 Response: See response to Comment O4-171. Refinements to Mitigation Measures 4.5-1c have been made to remove the "if feasible" phrase, as shown in Chapter 3, "Errata," to this Final EIR.

Comment O4-200 Response: See response to Comment O4-142. For the reasons stated therein, no changes to Mitigation Measure 5.2-1 are required.

Comment O4-201 Response: To ensure that attendance would be limited to that peak scenario evaluated in the EIR, refinements to Mitigation Measure 4.4-3c have been identified to implement this limit as a mandatory, enforceable condition; these edits are reflected in Chapter 3, "Errata," to this Final EIR and in alignment with commenter's suggestion.

Comment O4-402 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives. No further changes to the Draft EIR are required.

Comment O4-402 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives. No further changes to the Draft EIR are required.

Comment O4-203 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved the use of alternate existing stadiums or "split venues", as those alternatives would not be feasible or obtain any of the basic Project objectives.

A no permanent lighting, reduced height/illumination (in the form of portable diesel-power lights), and reduced capacity alternative is included in the Draft EIR as the No Project Alternative, which is described on Draft EIR pages 6-4 and 6-5, and evaluated on Draft EIR pages 6-6 through 6-17. Regarding a reduced capacity or limited-operations approach, one of the project objectives is to "[p]rovide 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." Another project objective is to "[e]xpand the capability of Rio Americano High School to host athletic and non-athletic events...." (Draft EIR, page 6-3). The focus of alternatives analysis must be on 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. Reducing

the capacity of the proposed facilities would conflict with multiple project objectives. Regarding an earlier curfew, the project objectives include: "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; 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" (Draft EIR, page 6-3). Creating an earlier curfew point for the use of Rio Americano's facilities would not allow scheduling of practices and competitions outside of the normal classroom instruction times of the day or scheduling of events during cooler parts of the day. Regarding reduced height or illumination, the height of the lighting standards allows the light to be focused specifically on the field of play and avoid any light trespass or glare that could affect off-site areas. Regarding a reduction in illumination, the lighting design employs the best practices and technology available to avoid light trespass and glare. No changes to the Draft EIR are required.

Comment O4-204 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved the use of alternate existing stadiums or "split venues," as those alternatives would not be feasible or obtain any of the basic Project objectives. As to the commenter's contentions about the use of El Camino High School, Draft EIR Section 6.4.1, "No Project Alternative," evaluates the continuation of existing stadium operations, including continued use of El Camino High School Stadium for nighttime football games. Under this alternative, the proposed stadium improvements would not be constructed, and existing athletic activities would continue, including use of portable lighting for certain evening events. The Draft EIR identifies the No Project Alternative as environmentally superior because it would avoid construction of the proposed improvements and reduce impacts in several environmental resource areas. However, the Draft EIR also explains that continued use of El Camino High School would not achieve the project objectives related to hosting additional athletic and non-athletic events on the Rio Americano campus and increasing scheduling flexibility. Draft EIR Section 6.3.3 discusses the use of existing alternative stadiums, including additional travel associated with off-campus events and the District's limited control over scheduling at those facilities. No further changes to the Draft EIR are required.

Comment O4-205 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives. As Master Response 8 explains, based on feedback it received during the public scoping process, along with comments raised in response to the NOP, the District crafted alternatives for consideration that encompassed the suggestions proposed by commenters. Alternative 2, specifically, incorporates many of the proposed features that commenters requested, including a woodland buffer and relocating the proposed stadium and improvements. For a discussion on why the District ultimately concluded this alternative would not be feasible, please see Master Response 8 and Draft EIR, page 6-5. That the Draft EIR did not individually

analyze every alternative suggested by commenters and agencies does not render it deficient or lacking in informational quality needed for informed decision making. (See *Save Our Access etc. v. Watershed Conservation Auth.* (2021) 68 Cal.App.5th 8, 32 ["CEQA does not require that an agency consider specific alternatives that are proposed by members of the public or other outside agencies. Rather, an agency is responsible for selecting a range of project alternatives that could feasibly accomplish most of the basic objectives of the project and could avoid or lessen one or more of its significant impacts"].) No further changes to the Draft EIR are required.

Comment O4-206 Response: Please see Master Response 8: Alternatives. As to the commenter's contention that the Draft EIR inconsistently explains the proximity of Alternative 2's sports lighting to the American River Parkway, as shown in FEIR Chapter 3, "Errata," the typographical error noted by the commenter in the last paragraph on page 6-7 has been corrected to state that, under Alternative 2, the sports lighting would be located *further* from American River Parkway and relatively *less* visible from this public viewing location compared to the visibility of lighting under the proposed project.

As to the commenter's question about how the Draft EIR concluded that the No Project Alternative would have "slightly greater" impacts related to a "New Source of Light and Glare," even though it would continue to use existing lights, the Draft EIR explains that this question and ensuing impacts centers on potential lighting impacts that stem from light trespass and glare, rather than the mere visibility of light from public viewpoints. (Draft EIR, pp. 6-6 to 6-7.) The Draft EIR explains that the proposed Project's lighting standards would reduce light trespass and glare at the public viewpoints from where the existing temporary on-site lighting is currently directed. (Draft EIR, p. 6-7.) The Draft EIR explains that, under the No Project Alternative, the District would not use the proposed Project's two ball trackers, which are highly controlled portion of the lighting 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 pall. Instead, the existing lighting at the track and field, which is not directional and currently results in some light spillage outside the campus boundary, would remain. In other words, the proposed Project's lighting features would reduce the existing light spillage impacts that would continue to persist under the No Project Alternative. Accordingly, the No Project Alternative's impacts on light trespass and glare would be slightly greater than the proposed Project's. (Draft EIR, p. 6-7.) No further changes to the Draft EIR are required.

Comment O4-207 Response: Please see Master Response 8: Alternatives, Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. As to the commenter's contention that the Draft EIR's comparison of the proposed Project and Alternative 2 must consider operational light impacts to wildlife, the Draft EIR does so on pages 6-8 to 6-9. The Draft EIR explains that "[t]here would be no change in operational light 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." (Draft EIR, p. 6-9.) Because both would have less-than-significant operational lighting impacts on wildlife, the Draft EIR concludes impacts for the proposed Project and Alternative 2 would be the same, thus not requiring mitigation. Please also

see response to comments O4B-110, O4B-106, O4B-117. No further changes to the Draft EIR are required.

Comment O4-208 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives. Please also see response to comment O4-302 and O4-204. As to the commenter's contentions that the Draft EIR overstates that the No Project Alternative would meet none of the Project objectives and instead should distinguish those that would be partially satisfied, CEQA does not require this level of extensive analysis in considering the feasibility of alternatives; nor does it require an EIR to analyze alternatives to a component of a proposed project or variations of the same alternative. (*California Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 993; *Cherry Valley Pass Acres & Neighbors v. City of Beaumont* (2010) 190 Cal.App.4th 316, 355–356.) Moreover, CEQA does not obligate the District to modify its Project objectives to meet a desired alternative, including the No Project Alternative. (See *Planning & Conservation League v. Department of Water Resources* (2024) 98 Cal.App.5th 726, 760–761 ["When an agency has deliberately limited the scope and nature of the problem that it wants to solve, the agency should not be required to consider alternatives that address a much bigger problem or that add difficult issues the agency has chosen not to tackle"].) The Draft EIR provides sufficient information to allow meaningful evaluation, analysis, and comparison with the proposed project. Therefore, no further changes to the Draft EIR are required.

Comment O4-209 Response: Please see Master Response 8: Alternatives. As to the commenter's request that the EIR include a separate acoustical analysis to assess the noise reduction benefit of Alternative 2's proposed 100-foot landscape buffer, CEQA does not require this level of technical detail when analyzing alternatives. (CEQA Guidelines, § 15126.6(d) [EIR must include "sufficient information" about each alternative, but impacts need not be discussed with the same detail as those of the project].) The Draft EIR concludes, based on best available data produced by technical industry experts and substantial evidence, that Alternative 2's proposed 100-foot-wide landscape buffer would provide some noise reduction but not fully eliminate crowd, bleacher, band, and public-address related event noise. This conclusion is reasonable and does not mandate a separate technical analysis. (CEQA Guidelines, § 15126.6 [range and analysis of alternatives is governed by the "rule of reason"].) Therefore, no further changes to the Draft EIR are required.

Comment O4-210 Response: Please see Master Response 8: Alternatives. As to the commenter's suggestions about lighting colors, times, and event curfews, please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife; Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors; and responses to comments O4-B120, O4-B121 and O4B-122. As to the commenter's suggestions about noise monitoring, bleacher damping, and bleacher walls, please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife, Master Response 4: Mitigation, and responses to comments O4C-13, O4C-15, O4C-22, O4C-23, and O4C-24. Clarifying edits are made to Mitigation Measure 4.3-1b to specifically mention that noise-reducing features may include sound-deadening treatment on the underside of seating and

floorboards, as shown in Chapter 3, "Errata", of this Final EIR. As to the commenter's contentions about traffic, circulation, and parking impacts, please see Master Response 4: Mitigation, Master Response 5: Trip Generation and Vehicle Miles Traveled, Master Response 6: Parking Availability; Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation; and responses to comments O4D-1, O4-D3, O4D-15, and OD-4-31. Otherwise, the commenter does not explain how the proffered alternatives would avoid or substantially lessen one or more of the project's significant impacts. (*Save Our Access etc. V. Watershed Conservation Auth.* (2021) 68 Cal.App.5th 8, 33.) Thus, no further changes to the Draft EIR are required.

Comment O4-211 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved a reduced-capacity alternative, as it would not be feasible or obtain any of the basic Project objectives. Please also see response to comment O4-203. No further changes to the Draft EIR are required.

Comment O4-212 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved limited nighttime operations alternative, as it would not be feasible or obtain any of the basic Project objectives. Please also see response to comment O4-203. No further changes to the Draft EIR are required.

Comment O4-213 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved a split-venue alternative, as it would not be feasible or obtain any of the basic Project objectives. Please also see response to comment O4-203. No further changes to the Draft EIR are required.

Comment O4-214 Response: Please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved a hybrid alternative, as it would not be feasible or obtain any of the basic Project objectives. Please also see response to comment O4-203. No further changes to the Draft EIR are required.

Comment O4-215 Response: The commenter contends that each alternative should be compared quantitatively using the same attendance, schedule, noise, traffic, parking, and biological assumptions applied to the proposed Project. As detailed in Chapter 6, *Alternatives*, the Draft EIR compares the selected alternatives (Alternatives 1 and 2) against the assumptions that were used to inform the proposed Project's analysis. The commenter does not provide further information or explain how or why this analysis was insufficient. To the extent the commenter is requesting that

these considerations be analyzed for the alternatives proposed in the preceding list, please see Master Response 8: Alternatives, which provides a detailed summary outlining how the District selected and analyzed project alternatives to further consider in the EIR based on the stated Project objectives, including why the District rejected for further consideration an alternative that would have involved a split-venue alternative, as it would not be feasible or obtain any of the basic Project objectives. Please also see response to comment O4-203. No further changes to the Draft EIR are required.

Comment O4-216 Response: This comment includes the commenter's conclusion and is noted. Please see Master Response 10: Accurate, Stable, Finite Project Description, and Master Response 4: Mitigation, Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No further changes to the Draft EIR are required.

Comment O4-217 Response: Please see Master Response 9: Cumulative Impacts, and Master Response 10: Accurate, Stable, and Finite Project Description. No further changes to the Draft EIR are required.

Comment O4-218 Response: Please see Master Response 9: Cumulative Impacts, and Master Response 10: Accurate, Stable, and Finite Project Description. No further changes to the Draft EIR are required.

Comment O4-219 Response: Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife, Master Response 4: Mitigation, and responses to comments O4-35, O4-36, O4B-3, O4B-4, O4B-18, O4B-52, O4B-53, O4B-61, O4B-71, O4B-76, and O4B-82. No further changes to the Draft EIR are required.

Comment O4-220 Response: Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife, Master Response 4: Mitigation, and responses to comments O4-22, O4-23, O4-24, and O4-25. No further changes to the Draft EIR are required.

Comment O4-221 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No further changes to the Draft EIR are required.

Comment O4-222 Response: Please see Master Response 4: Mitigation, Master Response 8: Alternatives, and Master Response 10: Accurate, Stable, Finite Project Description. No further changes to the Draft EIR are required.

Comment O4-223 Response: Please see Master Response 10: Accurate, Stable, Finite Project Description regarding why recirculation of the Draft EIR is not necessary because it does not present significant new information about substantially new or more severe environmental impacts. No further changes to the Draft EIR are required.

Comment O4-224 Response: Please see response to comment letters O4A, O4B, O4C, O4D, and O4E for individual responses to the contentions raised therein. No further changes to the Draft EIR are required.

Comment O4-225 Response: Please see Master Response 10: Accurate, Stable, Finite Project Description regarding why recirculation of the Draft EIR is not necessary because it does not present significant new information about substantially new or more severe environmental impacts. No further changes to the Draft EIR are required.

Comment O4-226 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER O4A. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT A; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4A. Rio Americano Community Alliance, Attachment A

Comment O4A-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER O4B. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT B; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4B. Rio Americano Community Alliance, Attachment B

Comment-O4B-1 Response: Responses to discrete comments regarding the analysis of impacts on biological resources in the Draft EIR are provided in O4B-2 through O4B-154, below.

Comment-O4B-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-3 Response: The Draft EIR evaluates native wildlife and other sensitive biological resources in addition to special-status species. For example, please see "Vegetation and Wildlife" (pages 4.2-1 through 4.2-2), "Special-Status and Nesting Birds" (page 4.2-9), and "Roosting Bats" (pages 4.2-9 through 4.2-10) in the Draft EIR. Please also see the evaluation of potential impacts to sensitive biological resources, including native wildlife, under Impact 4.2-1 (pages 4.2-15 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27) in the Draft EIR.

This comment does not identify why additional field surveys would be necessary to support the analysis. Please see response to comment O4B-71 below regarding bat survey techniques.

Comment-O4B-4 Response: The Draft EIR did not restrict analysis of potential project impacts on wildlife to the school campus. Evaluation included biological resources in the American River Parkway for relevant project impacts (e.g., noise, movement corridors) where the potential extent of an impact overlapped the potential for sensitive biological resources (e.g., habitat in the American River Parkway). Please see the evaluation of potential impacts to sensitive biological resources under Impact 4.2-1 (pages 4.2-15 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27) in the Draft EIR.

Comment-O4B-5 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-6 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-7 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-8 Response: Comparison of site-specific bat survey results with other survey results is not necessary to evaluate project-specific potential impacts on bat species.

Comment-O4B-9 Response: This comment mischaracterizes the Draft EIR analysis of noise and light impacts on wildlife in the American River Parkway. The Draft EIR does not claim the trees along the south edge of Raider Stadium would "prevent project-generated light and noise from affecting wildlife in the Parkway." The bat survey

memorandum in Appendix C notes that the trees "would reduce potential disturbance in the American River Parkway to a degree that it would not be expected to cause roost abandonment." The analysis in the Draft EIR under Impact 4.2-1 (pages 4.2-20 through 4.2-21) expounds on potential operational noise impacts on wildlife by providing conservative estimates of noise levels during stadium events without any screening. The Draft EIR analysis considers these noise estimates, among other factors (e.g., noise frequency and duration), in the impact analysis and comes to a determination of a less-than-significant impact, rather than no impact.

Comment-O4B-10 Response: This comment does not identify how the Draft EIR misuses the California Natural Diversity Database (CNDDB) or which wildlife species were inaccurately assessed. Please see specific response to Comment-O4B-76 below regarding identification of special-status species for analysis.

Please also note that the biological resources section of the Draft EIR (Section 4.2) did not define a single study area but evaluated impacts where the extent of that impact may overlap potential sensitive biological resources.

Comment-O4B-11 Response: This comment does not identify why the Draft EIR analysis of noise and light impacts on wildlife is incomplete. Please see Master Response 2 regarding the Draft EIR evaluation of operational light and noise impacts on biological resources.

Comment-O4B-12 Response: Please see response to Comment-O4B-96 regarding productive capacity.

Comment-O4B-13 Response: Please see responses to Comment-O4B-105 through Comment-O4B-119 regarding the proposed project's mitigation strategy.

Comment-O4B-14 Response: Please see responses to Comment-O4B-120 through Comment-O4B-121 regarding mitigation for operational lighting impacts, and responses to Comment-O4B-125 through Comment-O4B-127 regarding measurement of project impacts to bats.

Comment-O4B-15 Response: The assessment of project alternatives considered potential impacts to all evaluated environmental resources, including biological resources. See Table 6-1 in the Draft EIR (p. 6-17). Please also see response to Comment-O4B-129 regarding impacts to biological resources under Alternative 2.

Comment-O4B-16 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-17 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-18 Response: As indicated in on pages 4.2-2 and 4.2-3 of the Draft EIR, special-status species considered in this Draft 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 (CFGC);
- taxa (i.e., taxonomic categories or groups) assigned a California Rare Plant Rank (CRPR) of 1A, 1B, 2A, or 2B;
- taxa that meet the criteria for listing, even if not currently included on any list, as described in Section 15380 of the CEQA Guidelines.

The commenter provides no basis for considering all plant and wildlife species on California's Taxa to Watch List or U.S. Fish and Wildlife Service Birds of Conservation Concern list or protected by the California Fish and Game Code as special-status species. The commenter's characterization of special-status species does not align with the definition of endangered, rare, or threatened in Section 15380 of the CEQA Guidelines.

Comment-O4B-19 Response: Please also note that the biological resources section of the Draft EIR (Section 4.2) did not define a study area but evaluated impacts where the extent of that impact may overlap potential sensitive biological resources. This evaluation of potential impacts to biological resources was not limited to the project's construction footprint.

Comment-O4B-20 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-21 Response: The commenter's habitat observations are consistent with the Draft EIR descriptions of the environmental setting, including turf grass on the project site, ornamental trees along the southern border of the school campus, and riparian habitat south of the project site (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2 in the Draft EIR). This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-22 Response: The Draft EIR noted the potential for wildlife species to use the project site (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2 in the Draft EIR), consistent with the commenters' observations. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-23 Response: This comment notes the existing conditions at the project site and in surrounding riparian habitat included bright skyglow at the time of the commenters' observations. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-24 Response: The American River Parkway has a 15 mile-per-hour speed limit for cyclists, including those on e-bikes, which poses low risk for wildlife collisions, particularly during daytime hours, and the American River Parkway closes at sunset. As referenced under Impact 4.2-1 in the Draft EIR, vegetation management along the levee slopes likely precludes the presence of sensitive life stages of native wildlife (e.g., nesting birds or northwestern pond turtles) along the levee, and northwestern pond turtles along the levee during daylight would be mobile and able to disperse away from any increased disturbance associated with stadium events. As noted in the comment, extensive recreation use of the American River Parkway, to which native wildlife is accustomed, currently

occurs. The Jedediah Smith Memorial Trail is approximately 32 miles long, running from the confluence of the Sacramento and American rivers in Sacramento to Folsom Lake; given the regional nature of the trail, the District does not anticipate that the shift in location and timing of a few stadium events under the proposed project would increase e-bike travel at a level that would be meaningful relative to wildlife conflicts.

Comment-O4B-25 Response: The Draft EIR analysis recognizes the potential for anthropogenic noise to "cover critical environmental sound cues" and "disturb sensitive life stages of protected wildlife species, including nesting birds" (page 4.2-21). Please see Master Response 2 for additional details regarding the Draft EIR's evaluation of operational noise impacts on wildlife.

See response to Comment-O4B-24 above regarding risk of wildlife collisions associated with potential project-related increases in bicycle traffic through the American River Parkway.

Comment-O4B-26 Response: These photos document existing riparian habitat conditions and a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-27 Response: This photo documents existing habitat conditions and a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-28 Response: This photo documents a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-29 Response: This photo documents a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-30 Response: The commenter's observations of various wildlife species, including juveniles, are consistent with the Draft EIR descriptions of the environmental setting (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2 in the Draft EIR). See responses to Comment-O4B-50 and Comment-O4B-51 below regarding the "special-status species" noted by the commenter in Tables 1 and 2. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-31 Response: The commenter's observations of various life stages and behaviors of native wildlife species are consistent with the Draft EIR descriptions of the environmental setting (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2 in

the Draft EIR). This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-32 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-33 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-34 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-35 Response: These photos document a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-36 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-37 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-38 Response: These photos document habitat and native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-39 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-40 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-41 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-42 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-43 Response: These photos document one native (osprey [*Pandion haliaetus*]) and one invasive (mute swan [*Cygnus olor*]) wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-44 Response: These photos document native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-45 Response: This photo documents a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-46 – Comment-O4B-49 Response: These species identifications are generally consistent with species expected to occur in the project vicinity. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-50 Response: The commenter's observations of various wildlife species are consistent with the Draft EIR descriptions of the environmental setting (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2, and "Northwestern Pond Turtle," "Special-Status and Nesting Birds," and "Roosting Bats" on pages 4.2-9 through 4.2-10) in the Draft EIR. Note that this comment indicates northwestern pond turtle is a candidate for federal listing, but it is proposed for federal listing as threatened under the Endangered Species Act. Please also refer to Comment-O4B-18 above regarding the use of the term "special-status species" in the Draft EIR and in this comment letter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-51 Response: The comment does not point out the relevance of Table 2, which includes wildlife observations 1 mile from the project site from 2020 to 2023, to the analysis of potential project impacts on biological resources in the Draft EIR. Impacts of the proposed project (e.g., noise, light) will not reach 1 mile from the project site. Furthermore, the habitat at and adjacent to the project site may differ from the habitat where these observations occurred.

Comment-O4B-52 Response: This comment does not provide sufficient detail to indicate why all species in Table 1 and likely Table 2 would face habitat loss from the proposed project. The comment does not reference the proximity of the observations or suitable habitat for observed species relative to potential light and noise impacts from the proposed project. Furthermore, as indicated in the response to Comment-O4B-51 above, the assumption that all species listed in Table 2 would likely face habitat loss as a result of the proposed project is not supported; these observations occurred 1 mile from the project site where habitat would not be exposed to project impacts. The Draft EIR addresses potential impacts of project light and noise on biological resources under Impact 4.2-1 (pages 4.2-15 through 4.2-24) and Impact 4.2-4 (pages 4.2-24 through 4.2-25). Please also see Master Response 2 for additional details regarding potential operational light and noise impacts from the proposed project on biological resources.

Comment-O4B-53 Response: The comment letter does not sufficiently detail survey methods to defend the applicability of nonlinear regressions to the commenter's wildlife observations. Furthermore, this comment does not assess the comparability of previous surveys in the region (e.g., habitats present, area surveyed, survey timing) to surveys in the vicinity of the proposed project. This comment does not pertain to the adequacy of the project-specific environmental analysis contained in the Draft EIR. Regardless, the Draft EIR analysis notes the quality of riparian habitat in the American River Parkway and the potential for various life stages of native wildlife to occur both within that riparian habitat and within lower quality habitat within the project site (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2). The Draft EIR also evaluates potential impacts of the project on wildlife under Impact 4.2-1 (pages 4.2-15 through 4.2-24) and Impact 4.2-4 (pages 4.2-24 through 4.2-25).

Comment-O4B-54 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. See response to Comment-O4B-53 above regarding the nonlinear regression data and evaluation of native wildlife in the Draft EIR.

Comment-O4B-55 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. See response to Comment-O4B-53 above regarding the nonlinear regression data and evaluation of native wildlife in the Draft EIR.

Comment-O4B-56 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. See response to Comment-O4B-53 above regarding the nonlinear regression data and evaluation of native wildlife in the Draft EIR.

Comment-O4B-57 Response: This data is consistent with expected bat activity in the project vicinity. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-58-60 Response: Fewer than 20 bat species are known from the project area, so the mathematical species projections exceed the total number of species possible; however, the species projections and bat activity are generally consistent with expected bat species diversity and activity in the project vicinity. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment-O4B-61 Response: Comment-O4B-52 through Comment-O4B-60 do not reflect why comparative analyses are necessary to support CEQA evaluation of project-specific impacts on biological resources. Furthermore, evaluation of potential project impacts on biological resources should consider more factors than species richness. The Draft EIR addresses potential project impacts on biological resources in consideration of the rarity of resources (e.g., species' statuses), sensitivity of resources (e.g., breeding or roosting life stages), magnitude and frequency of potential impacts, and the existing (baseline) setting, among other factors, under Impact 4.2-1 (pages 4.2-15 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27).

In response to specific concerns regarding the approach used to evaluate potential impacts to bat species, the survey results and mathematical projections provided by the commenter are consistent with the type of survey results that would be anticipated from the project vicinity, and which were assumed as part of the impact analysis. Surveys to document the species composition and activity levels were not necessary to confirm the assumptions used in the analysis, nor were comparative analyses from surveys in other areas. Such surveys and comparisons would provide no additional useful information for evaluating potential impacts to bats at and near the project site. The Parkway provides abundant and high-quality foraging habitat, and bats in the project vicinity generally would be expected to continue to favor this habitat over the poor-quality foraging habitat provided at and around the highly disturbed artificial turf that exists at the project site. Evaluation of the existing foraging habitat in comparison with the similarly poor-quality projected foraging habitat was sufficient to determine that bats foraging at or near the project site would experience little change and impacts to foraging bats would be less than significant.

Comment-O4B-62 Response: See response to Comment-O4B-53 above regarding the nonlinear regression data in this comment letter and the comparability of observations near the project site to commenters' other observations. This comment also does not acknowledge the differences in habitat availability and quality at the project site, the adjacent levee, and the riparian and aquatic habitat in the American River Parkway greater than 100 feet from the project site, instead referring to all these habitats cumulatively as the "project area."

The Draft EIR analysis notes the quality of riparian habitat in the American River Parkway and the potential for various life stages of native wildlife to occur both within that riparian habitat and within lower quality habitat within the project site

(see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2) and adjacent levee. The Draft EIR also evaluates potential impacts of the project on wildlife under Impact 4.2-1 (pages 4.2-15 through 4.2-24) and Impact 4.2-4 (pages 4.2-24 through 4.2-25).

Comment-O4B-63 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. See response to Comment-O4B-53 above regarding the nonlinear regression data and evaluation of native wildlife in the Draft EIR.

Comment-O4B-64 Response: The CEQA Guidelines do not outline specific procedures for assessing species occurrence and project outcomes. The evaluation of biological resources in the Draft EIR included both desktop review and a field survey/habitat assessment for bats. The Draft EIR assessed the communities in and adjacent to the project site (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2), the potential presence of special-status species (see "Species with Potential to Occur" on pages 4.2-3 through 4.2-10), and potential impacts to sensitive biological resources (Impact 4.2-1 [pages 4.2-15 through 4.2-24], Impacts 4.2-2 and 4.2-3 [page 4.2-24], Impact 4.2-4 [pages 4.2-24 and 4.2-25], Impact 4.2-5 [pages 4.2-25 and 4.2-26], and Impact 4.2-6 [pages 4.2-26 and 4.2-27]). No changes to the Draft EIR are required.

Comment-O4B-65 Response: Field surveys are not necessary to identify species with the potential to occur at or near the project site. Field surveys for wildlife are susceptible to negative findings associated with survey timing, unit effort, and species detectability. The Draft EIR conservatively assumes potential presence of species based on the availability and quality of suitable habitat at and adjacent to the project site. The Draft EIR evaluates species with the potential to be present and impacted by the proposed project and includes surveys as part of Mitigation Measures 4.2-1c, 4.2-1d, and 4.2-1e (pages 4.2-22 through 4.2-23) where necessary to confirm species' presence and avoid significant impacts.

Comment-O4B-66 Response: The Draft EIR characterizes the existing Environmental Setting in Section 4.2.1 to inform the evaluation of potential impacts of the proposed project on biological resources. This comment mischaracterizes the Draft EIR's assessment of wildlife species; the Draft EIR does not speculate that the wildlife community of the Rio Americano Area is entirely separate from the Rio Americano High School campus. In the provided example, the Draft EIR notes that yellow-billed cuckoos are unlikely to occur in the project site based on the habitat quality relative to the species' habitat associations. As noted in Table 4.2-1 of the Draft EIR, yellow-billed cuckoo occurs in "wooded habitat with dense cover and water nearby." This habitat is available within the American River Parkway but not on the school campus. This assessment does not imply that the proposed project would have no impact on species in the American River Parkway. The Draft EIR evaluates potential impacts on species both on the school campus and in adjacent habitat. See response to Comment-O4B-65 above regarding the need for field surveys and assumptions regarding the presence of biological resources.

Comment-O4B-67 Response: This comment mischaracterizes the Draft EIR's assessment of wildlife species. The Draft EIR uses the term "common wildlife" once in "Vegetation and Wildlife" on page 4.2-1 when specifically addressing wildlife species adapted to

urban environments. The Draft EIR addresses non-special-status wildlife species throughout the biological resources evaluation in Section 4.2, including additional language in "Vegetation and Wildlife" section. Please refer to response to Comment-O4B-18 above regarding the definition of special-status species in the Draft EIR.

Comment-O4B-68 Response: As stated under Impact 4.2-5 in the Draft EIR (pages 4.2-25 through 4.2-26), no trees would be removed as part of the proposed project. Furthermore, project implementation would adhere to the measures described under Impact 4.2-5 to protect native trees with driplines.

Comment-O4B-69 Response: The Musco lighting report (Appendix B of the Draft EIR) modeled light levels that would result from the proposed project stadium lighting following construction; the trees along the southern boundary of the school campus were not included in the operational light modeling. Estimates of operational noise in the Draft EIR analysis under Impact 4.2-1 (pages 4.2-20 through 4.2-21) used standard point-source attenuation rates to estimate noise attenuation between Raider Stadium and nearby riparian habitat in the American River Parkway. Therefore, the numbers used in the analysis of operational light and noise impacts on wildlife in the Draft EIR were conservative relative to existing conditions where trees and the raised levee may buffer some noise from events at Raider Stadium. The Draft EIR does not mischaracterize or overstate buffering of operational light or noise impacts by the trees along the project site. No changes to the Draft EIR are required.

Comment-O4B-70 Response: The Draft EIR's evaluation of the existing setting at and near the project site was informed by the bat field surveys and desktop review. The Draft EIR's characterization of vegetation and wildlife at the project site and in the vicinity does not reflect only the incidental wildlife observations recorded during the bat survey. The desktop review included evaluation of multiple references, including aerial imagery, CNDDB, and U.S. Fish and Wildlife Service's Information for Planning and Consultation (IPaC) (see page 4.2-2 of the Draft EIR) to assess available habitat and the potential for sensitive biological resources at and near the project site.

Comment-O4B-71 Response: This comment mischaracterizes the habitat assessment conducted for bat roosting habitat as "a search for guano under candidate roost sites." As described in Appendix C, "All buildings and other human-made structures were inspected using binoculars and a flashlight for structural features that could provide suitable roosting areas, such as holes in buildings larger than a quarter-inch that could provide ingress to building interiors and protected gaps or cavities that could provide roosting habitat on the outside of buildings. Structures were also inspected for indications of roosting such as guano, urine or oil staining, the sounds and smells of bat roosting, and bats visibly roosting. All trees within the survey area were also inspected for potentially suitable roosting habitat such as cavities and sloughing bark." The time used for conducting this habitat assessment was appropriate for the work required.

This comment states that "the field-fitting performed by Fettke was implemented without the benefit of observing actual light and noise from the project; in other words, Fettke speculated over where light and noise might penetrate up to 500

feet into the Parkway." Project evaluation that included "the benefit of observing actual light and noise from the project" would not have been possible until after the project was constructed and in use. The habitat assessment and impact analysis for potential bat-related impacts was scheduled and conducted during the early stages of project evaluation in order that any emergence surveys determined necessary could be conducted during the summer maternity season. Because quantified noise and lighting analysis for the project had not yet been completed, a conservative survey area was used, and conservative assumptions of noise and light changes were considered. Noise and light studies from the similar, nearby lighting project recently completed at Jesuit Highschool were reviewed, and that project site was visited during and after a lighted football game to evaluate the post-project conditions. Using these very conservative assumptions, as described in Appendix C, Ms. Fettke used the best professional judgement to determine that "Several trees along the American River Parkway had small cavities and small pieces of sloughing bark with appropriate protection and solar exposure that would provide potential roosting habitat to small numbers of bats. However, these potential roost features are screened from proposed lighting and noise disturbance at the high school by a row of large trees (mostly eucalyptus species) located along the southern fenceline between the school and the American River Parkway. The screening provided by this row of trees would reduce potential disturbance in the American River Parkway to a degree that it would not be expected to cause roost abandonment if any of the trees in the American River Parkway are used for roosting. Therefore, no further survey efforts were necessary for trees in the American River Parkway." The quantified noise and light studies that were later completed indicate less potential impact would result from project implementation (e.g., zero light trespass at the Parkway edge) than the conservative assumptions used for evaluating potential project impacts on bats and bat habitat.

This comment mischaracterizes the reasons for the emergence survey methodology used by stating that the use of night-vision technology would have been "impractical." It is true that in many circumstances the use of night-vision technology is a preferred survey approach. However, as described in Appendix C, for the project circumstances, conducting the emergence surveys using the naked eye was preferred "because lighting provided on the school buildings allowed superior visibility of flying bats after last light."

This comment indicates that the use of an Echometer for conducting acoustic surveys is inadequate. It is true that Echometers are not an appropriate tool for conducting professional acoustic surveys. Acoustic surveys were determined unnecessary for this project, and none were completed. As described in Appendix C, the Echometer used during the emergence surveys was used to help detect bats emerging from the trees being surveyed, not to conduct acoustic surveys or evaluate species presence or bat use of the project site for foraging. i.e., the sounds emitted from the Echometer were used to help detect any bats nearby during the emergence survey. Unvetted species IDs provided by the Echometer were consistent with the size, shape, and flight characteristics of the bats concurrently observed, but the unvetted species IDs were reported as incidental data, not as results of an acoustic survey.

Comment-O4B-72 Response: This comment stipulates that acoustic studies and a comparative analysis of foraging activity are required for evaluation of the proposed project. As described above in responses to Comment-O4B-61 and O4B-71, neither acoustic studies nor a comparative analysis were necessary nor appropriate to evaluate potential impacts on foraging bats or habitat.

Comment-O4B-73 Response: This comment presents an alternate interpretation of observations referenced in Appendix C and does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-74 Response: This comment implies that acoustic surveys were conducted and expresses a number of opinions about the adequacy of the survey methodology and results. Acoustic surveys were not conducted. See Response O4B-71. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

Comment-O4B-75 Response: This comment stipulates that acoustic studies and a comparative analysis of foraging activity are required for evaluation of the proposed project. As described above in responses to Comment-O4B-61 and O4B-71, neither acoustic studies nor a comparative analysis were necessary nor appropriate to evaluate potential impacts on foraging bats or habitat.

Comment-O4B-76 Response: CNDDB is widely regarded as a reliable and authoritative source for compiling lists of species with potential to occur in a given area. The CNDDB is administered by the California Department of Fish and Wildlife and only contains verified species observation data that is published if there is credible evidence of species presence. The California Native Plant Society Rare Plant Inventory and U.S. Fish and Wildlife Service's IPaC were also queried to identify special-status species with potential to occur in or near the project site. Furthermore, CNDDB records were not the sole source for estimating the occurrence likelihood of special-status species. The assessment of the potential for special-status species to occur within or near the project site in Table 4.2-1 of the Draft EIR (pages 4.2-4 through 4.2-7) considered species' ranges and habitat associations relative to the project site and surrounding habitat. In addition to evaluating specific special-status species identified by queries of CNDDB and IPaC, the Draft EIR also recognized the potential for nesting birds and roosting bats in and near the project site (pages 4.2-9 and 4.2-10).

Comment-O4B-77 Response: Please see response to Comment O4B-82 regarding use of eBird and iNaturalist records and the species included in Table 3. Please also see response to Comment O4B-18 regarding the definition of special-status species used in the Draft EIR.

Comment-O4B-78 Response: Please see responses to Comment O4B-76 and Comment O4B-82 regarding sources for special-status species records and the species included in Table 3. Please also see response to Comment O4B-18 regarding the definition of special-status species used in the Draft EIR.

Comment-O4B-79 Response: The Draft EIR's determinations of species occurrence likelihood in Table 4.2-1 are based on habitat associations, range, and the presence of suitable habitat where species may be impacted by the proposed project. The commenter does

not identify any specific mischaracterizations of occurrence likelihood in the Draft EIR.

Comment-O4B-80 Response: Please see response to Comment-O4B-4. The Draft EIR discusses biological resources potentially present at or adjacent to the project site in Section 4.2.1 (pages 4.2-1 through 4.2-10), with additional focused discussion of special-status or protected species with potential to be impacted by the project. Standard industry-accepted database queries were performed to establish potential presence of special-status and/or protected species. Please see responses to Comments-O4B-61 and O4B-71 through O4B-75 in regard to bat survey methods and impact evaluation approach.

Comment-O4B-81 Response: Please see response to Comment-O4B-4 regarding the extent of areas that were assessed for biological resources potentially present at or adjacent to the project site. The referenced Bat Survey Report included discussion of potential presence and impacts to bat species specifically and did not assess presence of or impacts to other special status species. Please see responses to Comments-O4B-61 and O4B-71 through O4B-75 with regard to bat survey methods and impact evaluation approach.

Comment-O4B-82 Response: The commenter provides records from citizen-science websites (eBird and iNaturalist), which are not standard industry-accepted databases. The CDFW's Biogeographic Data Branch reviews observation records from these websites and incorporates records that meet California's data quality standards into official state biodiversity databases, including the CNDDB.

This table includes species with records up to 30 miles from the project site. Proposed project impacts would not reach the distances used in this table to identify "occurrence likelihood" (i.e., 1.5 miles, 4 miles, and 30 miles), so occurrence likelihood should consider the presence of suitable habitat for these species at locations susceptible to project impacts, as was done in the Draft EIR evaluation of occurrence likelihood.

This table incorrectly incorporates the Draft EIR evaluation and determinations for multiple species, including Conservancy fairy shrimp, vernal pool fairy shrimp, vernal pool tadpole shrimp, northwestern pond turtle, and American badger.

Please see response to Comment-O4B-18 regarding the definition of special-status species used in the Draft EIR. All species fitting the Draft EIR definition of special status that are listed as "on site" in this table were evaluated in detail in the Draft EIR under Impact 4.2-1 (pages 4.2-15 through 4.2-24).

Comment-O4B-83 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-84 Response: The Draft EIR reflects bat survey data and industry-standard database occurrence records in its evaluation of biological resources. Mitigation Measures 4.2-1c, 4.2-1d, and 4.2-1e incorporate agency guidance and recommended survey techniques and buffers for special-status species with the potential to be impacted

by the proposed project. Please see Master Response 2 regarding the Draft EIR evaluation of operational light and noise impacts on biological resources.

Comment-O4B-85 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational light and noise impacts on biological resources.

Comment-O4B-86 Response: The collection of noise measurements presented in Section 4.3 of the Draft EIR followed industry standards, whereas the ambient noise levels that were measured and presented by the commenter do not. Furthermore, the commenter does not disclose the location(s) or duration(s) of these measurements. These measurements do not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

The Draft EIR evaluates impacts to native wildlife species from operational noise under "Noise" (pages 4.2-20 to 4.2-21), including species potentially present in the American River Parkway. Potential behavioral impacts on wildlife from operational noise are assessed in consideration of multiple factors, including frequency and duration of increased noise levels, attenuation of noise between the stadium and the American River Parkway, and ambient daytime conditions. The Draft EIR discloses that the modeled noise levels would be greater than ambient daytime conditions. Please see Master Response 2 regarding the Draft EIR evaluation of operational light and noise impacts on biological resources.

Comment-O4B-87 Response: Please see response to Comment-O4B-86. The commenters' measurements do not pertain to the adequacy of the environmental analysis contained in the Draft EIR. Please see Master Response 2 regarding operational noise-related impacts to wildlife species, including species potentially present in the American River Parkway.

Comment-O4B-88 Response: Please see response to Comment-O4B-86. The commenters' measurements do not pertain to the adequacy of the environmental analysis contained in the Draft EIR. Please see Master Response 2 regarding operational noise-related impacts to wildlife species, including species potentially present in the American River Parkway.

Comment-O4B-89 Response: The commentor's statement regarding the numerous ways that noise impacts wildlife species is consistent with the Draft EIR's impact analysis presented under "Noise" (pages 4.2-20 to 4.2-21), including reduced survival and fitness, increased psychological stress (i.e., release of stress hormones), and disruption of behavioral patterns. Use of A-weighted decibels (dBA) to establish noise-related impacts to wildlife species is consistent with established noise measurement methods for noise impact analysis of multiple taxa of wildlife (Shannon et al. 2016). As this comment indicates, noise impacts on wildlife vary with noise level, frequency, duration, and timing, which is consistent with the Draft EIR analysis. Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources.

The referenced literature by Slabbekoorn and Peet (2003) does show that the song pitch of the studied bird species elevated in response to increase ambient noise levels; however, the study indicates that this species exhibited behavioral plasticity that allowed the species to maintain effective communication and

territorial defense. Increased pitch does not cause direct physical harm. Therefore, this reference does not affect the adequacy of the environmental analysis contained in the Draft EIR.

Comment-O4B-90 Response: The commentor's statement regarding effects of noise on animal behavior is consistent with the potential behavioral impacts to wildlife species associated with noise, discussed in the Draft EIR.

Use of A-weighted decibels (dBA) to establish noise-related impacts to wildlife species is consistent with established noise measurement methods for noise impact analysis of multiple taxa of wildlife (Shannon et al. 2016). The Draft EIR's impact analysis presented under "Noise" (pages 4.2-20 to 4.2-21) noted potential for reduced survival and fitness, increased psychological stress (i.e., release of stress hormones), and disruption of behavioral patterns. However, the Draft EIR analysis also considers duration, frequency, and timing of operational noise when evaluating noise-related impacts to wildlife. Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources.

Comment-O4B-91 Response: Exact data are not available in the scientific literature for each special-status species with the potential to be impacted by the proposed project, and available studies, including the provided examples, cannot align perfectly with the modeled noise levels, duration, frequency, and seasonality of the proposed project. The Draft EIR's impact analysis presented under "Noise" (pages 4.2-20 to 4.2-21) noted potential for reduced survival and fitness, increased psychological stress (i.e., release of stress hormones), and disruption of behavioral patterns. However, the Draft EIR analysis also considers duration, frequency, and timing of operational noise when evaluating noise-related impacts to wildlife. Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources.

Comment-O4B-92 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources.

Comment-O4B-93 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational light impacts on biological resources.

Comment-O4B-94 Response: As discussed in the last paragraph on Draft EIR page 4.1-25, modeling of light conditions demonstrates that the proposed stadium lighting would result in zero light trespass off site at public (i.e., the American River Parkway) viewpoints. The lighting modeling used standard methods to establish and evaluate lighting trespass. The commenter's reference of a project and related lighting analysis that is unrelated to the Rio Americano High School Lighting Improvements project does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-95 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources.

Comment-O4B-96 Response: Modeling productive capacities is an ecological planning tool, often used for wildlife management decision making on a landscape level. This is not a

statutory requirement under CEQA. Potential impacts of the proposed project on nesting birds are evaluated under Impact 4.2-1 (pages 4.2-15 through 4.2-24) in the Draft EIR. The scale of the proposed analysis is not appropriate for a project-specific analysis of impacts that occur in a small area with existing (baseline) disturbance, infrequently, at short duration, and with new activities primarily being football games that generally outside the nesting season and an annual graduation and schoolwide assemblies and possibly school-sanctioned community events, as presented in Draft EIR Table 3-1.

Therefore, this comment does not affect the adequacy of the environmental analysis contained in the Draft EIR.

Comment-O4B-97 Response: Please see Comment-O4B-96 Response regarding productive capacity. Please responses to Comment-O4B-94 and Comment-O4B-95 regarding light trespass and skyglow, and response to Comment-O4B-24 regarding human traffic in the American River Parkway.

Comment-O4B-98 Response: The Draft EIR evaluated potential impacts to migratory corridors for all native wildlife species under Impact 4.2-4 (pages 4.2-24 through 4.2-25). Please see response to Comment-O2-26 regarding the determination of impacts to movement corridors in the EIR, and response to Comment O4B-24 regarding human traffic in the American River Parkway.

Comment-O4B-99 Response: The Draft EIR provides an evaluation of cumulative impacts from implementation of the proposed project when considered in combination with the other cumulative projects under Section 7.1.3 (pages 7-2 through 7-13) of the Draft EIR in conformance with Section 15130 of the CEQA Guidelines. Permanent habitat loss is not anticipated to result from the proposed project, and therefore does not need to be quantified. Potential impacts of operational noise and light are acknowledged and evaluated in the Draft EIR (pages 4.2-15 through 4.2-24) and found to be less than significant, but would not result in permanent habitat loss.

Comment-O4B-100 Response: This comment mischaracterizes the Draft EIR analysis. The Draft EIR evaluates potential project impacts to special-status species under Impact 4.2-1 (pages 4.2-15 through 4.2-24). Please see response to Comment-O4B-18 regarding the use of the term “special-status species” in the Draft EIR and in this comment letter.

Comment-O4B-101 Response: Section 4.2.2, “Environmental Setting,” of the Biological Resources section of the Draft EIR accounts for how past projects may have shifted the biological resources in the area over decades. Rio Americano High School has been present in its current location, including a stadium and regular active use of the stadium and surrounding athletic fields for practices, games, and other school activities since 1963.The environmental setting section describes the quality of existing habitat and potential species to occur and informs both the project-level and cumulative impacts analyses in the Draft EIR. Please see Master Response 9 regarding the cumulative impact assessment in the EIR.

Comment-O4B-102 Response: The Draft EIR conclusion that the proposed project would have a less-than-significant impact to migration considers other factors in addition to the

surface area of the poles. The Draft EIR analysis notes that it is more likely that wildlife would use the higher quality habitat along the American River Parkway as a movement corridor compared to the lower quality habitat within the project site (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2). As discussed in the Draft EIR under Impact 4.1-2 (pages 4.2-17 to 4.2-19), migrating birds typically fly at altitudes of approximately 2,600 feet, which is much greater than the 80-foot height of the light poles. Therefore, there is minimal collision risk associated with the proposed project.

Comparison of wind turbine projects to lighting pole project is inappropriate in this case, as wind turbines typically have a much larger surface area than the proposed lighting poles, and thus a larger area where collision could occur. Wind turbines also are frequently placed in movement corridors for raptors and other avian species, increasing the collision risk relative to the proposed project. See also Master Response 9: Cumulative Impacts and Related Projects.

Comment-O4B-103 Response: Please see response to Comment-O4B-102 and Master Response 9: Cumulative Impacts.

Comment-O4B-104 Response: The proposed project would not have any effects associated with radiofrequency radiation that would cumulatively contribute to those from the cell tower. The proposed project is also not anticipated to impact special-status invertebrate species, such as monarch butterfly, that are more vulnerable to exposure to radiofrequency radiation, as referenced in the comment. The comment does not identify how the proposed project would contribute to cumulatively considerable impacts relative to the radiofrequency radiation from the cell tower.

Comment-O4B-105 Response: Figure 6 in the comment letter is "The mean (95% confidence interval) number of vertebrate wildlife species detected by me [the commenter] and Noriko at hundreds of project sites (red), developed sites (black), and more pristine sites we survey as reference sites (green)." It is not relevant to this comment.

Section 4.2.1 in the Draft EIR identifies biological resources present or potentially present in areas potentially impacted by the proposed project, including the project site, the adjacent levee, and the American River Parkway, as appropriate. Potential impacts to these resources are assessed for significance, and appropriate mitigation is provided, where necessary, under Impact 4.2-1 (pages 4.2-15 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27) in the Draft EIR.

Please see responses to specific Comments O4B-106 through O4B-119 below.

Comment-O4B-106 Response: The purpose of Mitigation Measure 4.2-1a: Environmental Awareness Training is to avoid, minimize, or mitigate for possible impacts to wildlife and plant species during construction. The referenced concern about avoiding impacts caused by lighting and noise is related to operational impacts, which were determined to be less than significant under Impact 4.2-1 (pages 4.2-15 through 4.2-24) and Impact 4.2-4 (pages 4.2-24 and 4.2-25) in the Draft EIR.

Comment-O4B-107 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-108 Response: Note that, due to an error in numbering of comments in Comment O4B for this Final EIR, the numbered comments as identified in Comment Letter O4-B in Attachment A to this Final EIR goes from Comment O4B-107 to O4B-109, and skips the number O4B-108. There is no missing comment, just a typographical error. Therefore this is a placeholder and no response to comment provided.

Comment-O4B-109 Response: Environmental awareness training for project construction personnel is a widely accepted and implemented practice that is often required by natural resource regulatory agencies. These trainings facilitate compliance with environmental regulations and improve the project's ability to protect environmental resources during construction. Project personnel would be expected to adhere to any training provided as part of the project and any no-disturbance buffers, regulations, or policies disclosed in that training.

Mitigation Measure 4.2-1a would be implemented in conjunction with other measures to protect sensitive biological resources during construction. Where necessary to avoid impacts to these resources, sufficient steps have been included in other mitigation measures. For example, Mitigation Measure 4.2-1c (page 4.2-22 in the Draft EIR) includes flagging or fencing blue elderberry for avoidance, and Mitigation Measure 4.2-1e (pages 4.2-22 through 4.2-23 in the Draft EIR) includes establishment of a buffer around and monitoring of active nests by a qualified biologist.

Comment-O4B-110 Response: Implementation of construction Best Management Practices and construction monitoring by a qualified biologist, as needed per Mitigation Measures 4.2-1c through 4.2-1e, is a requirement for project implementation, as discussed in the Draft EIR. A qualified biologist would be required to be present onsite to administer the environmental awareness training and perform pre-construction surveys for protected plant and wildlife species. If, at any point, sensitive biological resources are discovered on the project site in areas in a situation where they could be impacted, the qualified biologist would be contacted and be present at the project sites to ensure the appropriate protective actions are taken.

The purpose of Mitigation Measure 4.2-1b: Best Management Practices for Biological Resources is to avoid and minimize possible impacts to wildlife and plant species during construction. The referenced concern about avoiding impacts caused by lighting and noise is related to operational impacts. Mitigation is not required for less-than-significant operational noise and light impacts on wildlife. Operational light and noise are addressed in the project's design considerations and Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls. The measure will remain as is.

Comment-O4B-111 Response: Mitigation Measure 4.2-1b would work in conjunction with Mitigation Measures 4.2-1a, 4.2-1c, 4.2-1d, and 4.2-1e to avoid and minimize potentially significant impacts of project construction on blue elderberry shrub habitat for valley elderberry longhorn beetle, northwestern pond turtle, and nesting birds.

Please see "Significance after Mitigation" on page 4.2-23 of the Draft EIR for an evaluation of how the measures would avoid and minimize potential impacts.

Public Resources Code § 21081.6 requires a Lead Agency to adopt a monitoring and reporting program for any mitigation measures incorporated into a project or imposed as conditions of approval. Commitment to implementation of each mitigation measure and compliance monitoring is done through the Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if or when the District certifies the Final EIR.

Comment-O4B-112 Response: Mitigation Measure 4.2-1c: Blue Elderberry Avoidance is a requirement for project implementation, as discussed in the Draft EIR. The commenter does not clearly identify the purpose of the suggested reporting requirement, nor does it define the metrics that should be included in the report or to whom the report would be given. Therefore, it is unclear how this suggestion would improve the efficacy of the mitigation measure as it is currently written. Public Resources Code § 21081.6 requires a Lead Agency to adopt a monitoring and reporting program for any mitigation measures incorporated into a project or imposed as conditions of approval. Commitment to implementation of each mitigation measure and compliance monitoring is done through the Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if or when the District certifies the Final EIR.

No changes to the Draft EIR are required.

Comment-O4B-113 Response: Mitigation Measure 4.2-1c mitigates for potential construction impacts to valley elderberry longhorn beetle habitat, not operational noise and light impacts to valley elderberry longhorn beetle. Please see Master Response 2 regarding operational light and noise impacts of the proposed project on wildlife.

Comment-O4B-114 Response: Mitigation Measure 4.2-1d: Northwestern Pond Turtle Protections is a requirement for project implementation, as discussed in the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-115 Response: Mitigation Measure 4.2-1e: Nesting Bird Protections is a requirement for project implementation, as discussed in the Draft EIR. A qualified biologist would be required to survey the described buffers for the noted species. The mitigation measure does not require all surveys throughout all buffers to be performed by the same qualified biologist; multiple qualified biologists could perform the task as long as all required areas are surveyed by at least one qualified biologist.

Comment-O4B-116 Response: Mitigation Measure 4.2-1e: Nesting Bird Protections is a requirement for project implementation, as discussed in the Draft EIR. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-117 Response: The purpose of Mitigation Measure 4. 4.2-1e: Nesting Bird Protections is to avoid, minimize, or mitigate for possible impacts to bird species during construction. The referenced concern about avoiding impacts caused by lighting

and noise is related to operational impacts. Mitigation is not required for less-than-significant operational noise and light impacts on wildlife. Operational light and noise are addressed in the project's design considerations and Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls.

Comment-O4B-118 Response: Mitigation Measure 4.2-1e: Nesting Bird Protections does contain objective criteria for monitoring possible impacts to nesting birds, in order to appropriately implement protection actions. The measure defines what is considered unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, or flying away from the nest), under "Nest Avoidance." Appropriate non-disturbance buffer distances vary between bird species, where larger buffer distances are implemented for species that are more sensitive to human disturbance. A qualified biologist is expected to use their best objective, professional judgment to make decisions regarding species protection.

Comment-O4B-119 Response: Please see response to Comment-O4B-111.

Comment-O4B-120 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on wildlife. The commenter does not identify any potentially significant impacts for which the commenter's suggested mitigation would apply. As detailed in Draft EIR Section 4.3, "Environmental Impacts and Mitigation Measures," of the evaluation of the proposed project's potential impacts on biological resources, the Draft EIR determined that operational impacts to biological resources would be less than significant. Mitigation is not required for less-than-significant operational noise and light impacts on wildlife. Nonetheless, it is noted that any color-changing lighting (such as the RGBU and RGBW circuits identified in the Musco Lighting Report) would be used for intermittent and very short durations (on the scale of seconds) to emphasize things like introductions and scores in a game. Furthermore, the proposed project has been designed to reduce light spill and glare, as well as manage high angle light pollution to minimize offsite light trespass and sky glow. Since the publication of the Draft EIR, the proposed project lighting design has received a "pass" rating form the Dark Sky Association, indicating that the project's impacts related to nighttime lighting and glare from proposed stadium light stands would be avoided or minimized.

Comment-O4B-121 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on wildlife. The commenter does not identify any potentially significant impacts for which the commenter's suggested mitigation would apply. As detailed in Draft EIR Section 4.3, "Environmental Impacts and Mitigation Measures," of the evaluation of the proposed project's potential impacts on biological resources, the Draft EIR determined that operational impacts to biological resources would be less than significant. Mitigation is not required for less-than-significant operational noise and light impacts on wildlife. Furthermore, the commenter does not provide any evidence as to how limiting lighting use to 15 minutes after the end of an event, of which could end at 6pm, 8pm, or 10pm, depending on the season and event, or limiting lighting use to 6 out of 7 days per week, would have any substantive affect on potential impacts. Finally, the commenter's recommendation to limit lighting use to 12 nights per

year would not achieve most of the project objectives; see also Master Response 8: Alternatives.

Comment-O4B-122 Response: The commenter does not identify any potentially significant impacts for which the commenter's suggested mitigation would apply. Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on wildlife. As detailed in Draft EIR Section 4.3, "Environmental Impacts and Mitigation Measures," of the evaluation of the proposed project's potential impacts on biological resources, the Draft EIR determined that operational impacts to biological resources would be less than significant. Mitigation is not required for less-than-significant operational noise and light impacts on wildlife. Nevertheless, the proposed project does include Mitigation Measure 4.3-1b to Implement Stadium Event Noise Controls, which includes a maximum public address system noise level of 70 dBA L_{max} at the nearest residential property line, scheduling events to conclude by 10:00 p.m., and cessation of the use of the public address system, music, and band activity after 10:00 p.m., except for safety-related items.

Comment-O4B-123 Response: The commenter does not identify any potentially significant impacts for which the commenter's suggested mitigation would apply. As detailed in Draft EIR Section 4.3, "Environmental Impacts and Mitigation Measures," of the evaluation of the proposed project's potential impacts on biological resources, the Draft EIR determined that operational impacts to biological resources would be less than significant. Mitigation is not required for less-than-significant operational noise and light impacts on wildlife. Furthermore, the proposed project does not include any removal of existing trees, and would also include measures to protect native trees from impacts (pages 3-10, 4.2-25 and 4.2-26 of the Draft EIR).

Comment-O4B-124 Response: The American River Parkway closes at sunset, so event attendees would not be expected to enter it after dark. The District cannot be responsible for enforcing policies outside the school campus. The commenter's personal opinion that increased nighttime attendance at sports events held at Raider Stadium could result in an increase in attendees unlawfully entering the Parkway at night is noted. If that were to happen, it would be a law enforcement matter; this does not represent a physical impact on the environment. (CEQA Guidelines Section 15131(a) ["social effects of a project shall not be treated as significant effects on the environment"].) No changes to the Draft EIR related to this issue are required.

Comment-O4B-125 Response: The commenter's reference to different types of bat roosting habitat is consistent with the Draft EIR descriptions of the environmental setting (see "Vegetation and Wildlife" on pages 4.2-1 and 4.2-2 in the Draft EIR) and descriptions described in Appendix C. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-126 and 127 Response: The comment suggests that the Draft EIR focused only on roost sites, and that a measurement of a standardized bat detection rates would be more effective at evaluating potential impacts to bats. The Draft EIR analysis included consideration of potential impacts on bats, bat roosting habitat, and bat foraging

habitat. The comment doesn't articulate what types of potential impacts the suggested methodology would be intending to address. However, standardized acoustic measurements of detection at or around the project site could be used to evaluate potential operational impacts on foraging bats and foraging bat habitat. Please see responses to Comment-O4B-61 and O4B-71 for discussion of why neither standardized acoustic measurements of detection nor a comparative analysis were necessary or appropriate to evaluate potential impacts on foraging bats or habitat, and the suggested corresponding mitigation measures are unnecessary for this potential impact that was determined to be less-than-significant.

Comment-O4B-128 Response: As detailed in the Draft EIR Section 6.5.3 for the evaluation of Alternative 2 impacts to biological resources, and consistent with requirements under CEQA Guidelines Section 15126.6(d) that requires sufficient information for a meaningful comparison with the proposed project, the Draft EIR notes that "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." A change in view of light poles would not be expected to impact wildlife.

Comment-O4B-129 Response: Alternative 2 would not be anticipated to alter project-generated human traffic in the American River Parkway, which could also be used to access the stadium if relocated to the northeastern corner of the campus. As stated in the Draft EIR (p. 6-9), operational noise impacts on wildlife would be reduced under Alternative 2 but would remain less than significant. No changes to the EIR are required.

Comment-O4B-130 Response: The comment does not pertain to adequacy of the Draft EIR, and above comments O4B-2 through O4B-129 provide responses to comments, as applicable, that cited to these reference materials.

Comment-O4B-131 Response: This photo documents a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-132 Response: This photo documents a native wildlife species in the vicinity of the project site, consistent with the Draft EIR evaluation under "Vegetation and Wildlife" on page 4.2-2. The comment does not note distance to the project site. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment-O4B-133 to Comment-O4B-154 Response: These sections present the commentor's professional qualifications and do not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

COMMENT LETTER O4C. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT D; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4C. Rio Americano Community Alliance, Attachment C

Comment O4C-1 Response: This comment provides an introduction of the comment letter and background on the firm and consultant that prepared the comment letter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4C-2 Response: This comment summarizes potential health effects of noise. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4C-3 Response: This comment describes previous projects related to sports facility noise that the commenter has been involved in and potential actions by attendees leaving large sporting events that can generate noise, including "people yelling to each other as they part, car doors slamming, engines starting and revving, potentially people honking as frustration mounts if traffic bogs down on the local streets, and music from radios playing" as described by the commenter. The commenter states that these "exit" noises should be controlled by school authorities by posting adequate staff and/or security personnel throughout the area where people park, including off-site. Mitigation Measure 4.3-1b requires the District to post signage and provide event announcements requesting that attendees depart quietly and respect nearby residential neighborhoods. No changes to the Draft EIR are required.

Comment O4C-4 Response: The commenter's concern that "the Draft EIR does an inadequate job of addressing those aspects of noise which it does treat quantitatively and does not even consider many of the associated noises that local residents are so rightfully concerned about" is addressed in the remaining comment responses to this comment letter (O4C-6 through O4C-29).

Comment O4C-5 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4C-6 Response: This comment includes direct text from Draft EIR Section 4.3, "Noise and Vibration" (p. 4.3-23) describing where the measurements were taken at the August 29, 2025 game at El Camino High School. The commenter states that the Draft EIR lacks a detailed description of what "football game" noises were captured by the measurements. This information is contained within the descriptions of the monitoring locations. The monitoring location behind the western bleachers, described in the Draft EIR on page 4.3-23 as being near the announcer cabin and speaker system and the location along the northern edge of the field, both approximately 50 feet from the nearest crowd seating area and/or public address/announcer area, represent higher-exposure conditions closer to the primary crowd and amplified sound sources from the public address/announcer area. The monitoring location behind the eastern bleachers, described on Draft EIR on page 4.3-23 as being 50 feet from the nearest crowd seating area and 50 feet from the public address/announcer area, also captures crowd noise and amplified sound from the speaker system. As detailed on Draft EIR page 4.3-22,

crowd noise includes cheering, yelling, whistles, and musical instruments. As described in Draft EIR Section 4.3.1 under the "Representative Measurements" heading, 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 and that these measurements are representative of the type and intensity of noise generated during nighttime high school football games.

Comment O4C-7 Response: The commenter summarizes the reference measurement monitoring locations and results from the Rio Americano home game at El Camino High School on August 29, 2025 in a table, including the average values and the maximum values for monitoring locations LT-01 and LT-02, with observations as to potential errors. While this represents an increase relative to that presented in the Draft EIR, it does not change the significance determination or applicable mitigation.

The commenter states that a detailed description of activities during the 20-minute measurements is not provided. As described in Draft EIR Section 4.3, "Noise and Vibration" (p. 4.3-9), 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., represent game-period noise conditions. As outlined in comment response O4C-6, 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 and that these measurements are representative of the type and intensity of noise generated during nighttime high school football games. Therefore, the short-term measurements captured crowd noise, such as yelling, cheering, whistles, and musical instruments, and amplified sound from the public address system.

No changes to the Draft EIR are required.

Comment O4C-8 Response: The commenter notes that the Draft EIR describes that the long-term measurements may understate noise levels during the game period (Draft EIR p. 4.3-11), but that the highest noise levels measured during the game period, assumed to be 7:30 PM – 9:30 PM, occurred at monitoring location LT-02 in the 8:00 PM – 9:00 PM hour at 84.1 dBA L_{eq} and 99.5 dBA L_{max}. A clarifying edit to the statement the commenter refers to in the subheader "Reference Measurements" of Section 4.3.1, "Environmental Setting" of the Draft EIR (p. 4.3-11) has been made; these edits are shown in Chapter 3, "Errata" of this Final EIR.

The commenter then applies the 17 dBA attenuation rate used in the Draft EIR and estimates the associated L_{eq} and L_{max} values.

The L_{eq} values presented in the Draft EIR (pp. 4.3-23 to 4.3-24) are the average measured values during the measurement period. Edits to clarify that the L_{eq} values are the average have been made and are shown in Chapter 3, "Errata" of this Final EIR. The L_{eq} values are provided for informational and comparative purposes to ambient noise measurements and are not used as the basis for the significance determination.

The L_{max} values previously presented reflected the average of measured values during the six-hour measurement period. The L_{max} values have been updated to reflect the highest hourly L_{max} values during the measurement period; these edits are shown in Chapter 3, "Errata" of this Final EIR. However, the previously identified significant and unavoidable operational noise impact remains unchanged.

Comment O4C-9 Response: The Draft EIR found that the Project's operational noise impact would be potentially significant due to exceedance of the Sacramento County noise thresholds, and ultimately significant and unavoidable with implementation of mitigation. As shown in the Draft EIR (p. 4.3-24), with edits in the Errata as described in comment response O4C-8, the maximum level at nearby residences when accounting for attenuation was found to exceed the threshold of significance, which was established based on Sacramento County noise policies, as acknowledged by the commenter. With regard to the L50 and L90 values, these were inadvertently transposed in the Appendix D to the Draft EIR, but were reported accurately in Draft EIR Section 4.3, "Noise and Vibration." As identified by the commenter, it is clear which is which, as L90 values cannot be greater than L50.

Comment O4C-10 Response: The commenter suggests that greater reliance should be placed on this analysis using the Draft EIR's long term data. The reference measurements collected at El Camino High School, which ultimately informed the operational noise significance finding, included long-term monitoring locations behind the eastern and western bleachers and shorter attended measurements near the northeastern corner of the field and along the northern and southern field boundaries. The long-term measurements documented the combined sound environment over the available six-hour monitoring period, including pre-game activities and the football game. The short-term measurements characterized conditions during selected periods of active game operations.

The significant and unavoidable significance conclusion of the Project's operational noise impact is based on the maximum reference football game noise level, which as noted in comment response O4C-8, occurred at the long-term monitoring location LT-02 in the 8:00 PM – 9:00 PM hour. As also noted in comment response O4C-8, edits are shown in Chapter 3, "Errata", of this Final EIR to reflect the highest hourly value and associated attenuated noise level at nearby residences. Nonetheless, the operational noise impact remains significant and unavoidable. Therefore, while the short-term measurements were evaluated to inform selected period of active game operations, these measurements ultimately were not the highest measured noise levels and therefore were not used to compare to the thresholds of significance. No changes to the Draft EIR are required.

Comment O4C-11 Response: The District acknowledges the comment regarding the characterization of crowd and band noise sources. The noise analysis in the EIR was conducted using established, industry-standard methodologies for environmental noise assessment, which are widely accepted under CEQA and by acoustical professionals. As outlined in Draft EIR Section 4.3, "Noise and Vibration" (p. 4.3-9), the noise measurements taken at El Camino High School approximately 50 feet from the crowd seating areas are within the area influenced by the

operation of the public address system and spectator activity during an evening game. The Draft EIR (pp. 4.3-23 to 4.3-24) also explains that the representative acoustical-center approach provides a simplified screening evaluation of stadium-event noise propagation. It does not mean that all spectators, instruments, and loudspeakers are located at one point or that all sources have identical propagation characteristics.

As outlined in the Draft EIR (p. 4.3-23), the nearest eastern residence would be approximately 350 feet from the 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 at greater distances from comparable sources may experience additional distance attenuation, although actual exposure would depend on individual source locations, directivity, and shielding would be at a greater distance from the noise sources and experience increased attenuation, resulting in reduced noise exposure compared to this nearest residence.

The commenter's simplified distributed-source example does not consider the actual contribution of individual spectators and other sources that depend on source strength, spatial distribution, directivity, and operating conditions. For example, human voice is directional and spectators typically face the field. The example does not, by itself, establish the magnitude of any underprediction for the proposed stadium. Furthermore, the commenter’s logic regarding the influence of near versus far noise sources does not demonstrate that the noise measurements fail to capture a conservative estimate of noise levels at the nearest noise-sensitive receptor. The purpose of the evaluation is not to isolate the relative contribution of sources close to and farther from the point of measurement, but rather to establish applicable reference noise measurements as they would occur during a similar scale game event.

The potential for elevated event noise at nearby residences is retained in the significance determination. The Draft EIR concludes that operational stadium-event noise would remain significant and unavoidable following implementation of all feasible mitigation. No changes to the Draft EIR are required. See the responses to comments O4B-1 through O4B-131 for noise impacts to the Parkway.

Comment O4C-12 Response: The locations of the noise measurements collected at El Camino High School are described on Draft EIR page 4.3-9 as being located behind the eastern and western bleachers and near the northeastern corner of the field and along the northern and southern field boundaries. As outlined in comment response O4C-6, the descriptions of the monitoring locations provide a description of what noise sources were captured by the representative measurements at El Camino High School.

By nature, noise sources during a high school football game would vary throughout the course of the game, with maximum measured noise levels occurring intermittently during louder crowd, public address, or band activity,

rather than constantly and all from the same sources throughout the duration of the game. The representative noise measurements reflect the combined influence of activities occurring during the respective measurement intervals. The measurements do not separately quantify the sound contributions from each activity and the measured maximum noise levels cannot be attributed to individual sources.

Comment O4C-13 Response: The Draft EIR includes spectator-generated bleacher noise as a source of noise during football games, which were identified as the representative worst-case event in the noise analysis due to their potential to generate the largest attendance, greatest public address system use, and highest levels of cheering, band activity, bleacher movement, and other spectator-generated noise (Draft EIR p. 4.3-22). Additionally, the Draft EIR includes mitigation to specifically address spectator-generated bleacher noise in Mitigation Measure 4.3-1b, which requires the Project's bleacher design to include noise-reducing features for ramps, platforms, or other walking surfaces. Clarifying edits are made to Mitigation Measure 4.3-1b to specifically mention that noise-reducing features may include sound-deadening treatment on the underside of seating and floorboards, as shown in Chapter 3, "Errata", of this Final EIR. Because the reference measurements do not isolate bleacher-generated noise, the analysis does not assign an unsupported source-specific sound level or assume a numerical reduction from an unselected treatment.

As noted by the commenter, fans stomping on the metal floorboards of the bleachers is a "familiar rallying tactic". Such rallying tactics would occur intermittently and for short-term periods during key moments of game play, and would not occur throughout the entire football game.

Further, the commenter acknowledges that the issue is recognized in the Draft EIR in Mitigation Measure 4.3-1b. While noise-reducing treatments would serve to reduce spectator-generated bleacher noise, the Draft EIR does not attempt to take credit for a certain level of quantifiable noise reductions and ultimately finds that impacts from stadium event noise would be significant and unavoidable.

Comment O4C-14 Response: The Kimley-Horn Draft Local Transportation Analysis dated August 13, 2026, evaluates both general-event and conservative-event attendance scenarios. Under the general-event scenario, estimated attendance of 2,200 people would generate demand for approximately 823 parking spaces, compared with 672 available on-campus spaces, resulting in an estimated deficit of 151 spaces. Under the conservative-event scenario, estimated attendance of 3,400 people would generate demand for approximately 1,295 parking spaces, resulting in an estimated on-campus deficit of 623 spaces.

The transportation analysis also identifies approximately 327 potential on-street parking spaces along nearby roadway segments. Therefore, the 623-space deficit does not establish that all 623 vehicles would park immediately adjacent to the nearest residences. Parking demand would be distributed among available neighborhood spaces, more distant parking locations, and potential shared parking facilities. For illustration, assuming two parking-related movements per vehicle during one hour and a reference sound exposure level of 71 dBA SEL at 50 feet (consistent with the assumption applied in the Draft EIR for on-site

parking), the estimated Project-only hourly noise levels for 5, 10, and 25 vehicles would be approximately 45.4, 48.4, and 52.4 dBA L_{eq}, respectively, at 50 feet. At a representative distance of 25 feet, the corresponding levels would be approximately 51.4, 54.4, and 58.4 dBA L_{eq}, assuming point-source attenuation. These calculations represent illustrative localized parking-activity scenarios rather than predictions that a specific number of vehicles would park along any individual residential frontage. The Draft EIR estimated that on-site parking lot noise would be approximately 64 dBA L_{eq} at 50 feet; therefore, even when considering parking related movements associated with 25 vehicles at a distance of 25 or 50 feet, which would not realistically occur proximate to a singular residence, off-site parking activities would not generate noise at levels higher than those already disclosed in the Draft EIR for on-site parking lot activities.

Therefore, potential noise generated by off-site parking activities would be lower than that disclosed in the Draft EIR and would not result in any new significant impacts. No changes to the Draft EIR are required.

Comment O4C-15 Response: The commenter notes that the parking lot noise analysis uses an "L_{eq}" reference level. Hourly L_{eq} is an appropriate acoustical descriptor for evaluating the cumulative sound energy associated with multiple vehicle movements over a specified period.

Potential sources of noise generated by spectators parking off-site raised by the commenter, including door closures, engine starts, engines revving, potentially squealing tires, potentially horns honking, and loud conversations, may result in intermittent and short-term noise in proximity to residences. However, these sources of noise would be short term (on the order of 1 second to shut a car door, a few seconds to start a car, and a few minutes of spectator conversations as they walk to their cars) and would not be cumulatively generated by all attendees parking offsite in the immediate vicinity of any one residence. Such sources of short-term noise by vehicles potentially parked in the vicinity of off-site residences, which would be limited by the number of parking spaces proximate to any one resident, would not be expected to generate noise at levels greater than those disclosed in the Draft EIR, as described in comment response O4C-14 above. Additionally, Mitigation Measure 4.3-1b would serve to reduce noise generated by spectators off-site by requiring the District to post signage and provide event announcements requesting that attendees depart quietly and respect nearby residential neighborhoods. The Draft EIR does not attempt to take credit for any quantifiable reductions in offsite noise and ultimately finds that stadium event noise would result in a significant and unavoidable impact. No changes to the Draft EIR are required.

Comment O4C-16 Response: The commenter acknowledges that the Draft EIR finds that operation of the improved stadium would result in significant and unavoidable impacts and that the District is required to adopt all feasible mitigation measures. The commenter's concerns that "the impacts of 'football noise' based on the quantified analysis may be underestimated and that stomping noise (which the Draft EIR acknowledges only obliquely as 'bleacher activity' and 'footfall or vibration-related noise'), has yet to be adequately analyzed in any quantified manner" are addressed in comment responses O4C-6 through O4C-13 above.

No changes to the Draft EIR are required.

Comment O4C-17 Response: This comment summarizes and restates language from Draft EIR Mitigation Measure 4.3-1b. The commenter acknowledges that the Draft EIR relies on a performance standard and specific actions to mitigate noise from the public address system. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4C-18 Response: The commenter suggests that "a more robust monitoring system should be used for at least the entire first season since the public address system's output will depend on the vocal effort of the announcers and the compression of any recorded playback as well as the system settings".

Draft EIR Mitigation Measure 4.3-1b (Draft EIR pages 4.3-25 through 4.3-26) provides feasible, enforceable, performance standards that would be implemented to reduce the project's operational noise impact. Mitigation Measure 4.3-1b already includes a maximum public address system noise level of 70 dBA L_{max} at the nearest residential property line, requires the approved public address system settings to be documented and maintained for evening events, and requires the District to prohibit event staff from increasing the public address system above the approved settings; edits are shown in Chapter 3, "Errata", of this Final EIR.

Beyond the public address system, which has a controllable and enforceable maximum system noise output, the District cannot feasibly control crowd noise. The Draft EIR noise analysis was prepared based on actual monitoring of noise at a football game representative of a worst-case event that could be held under the Project, including all noise sources. Therefore, additional monitoring would not further reduce noise levels and is not necessary. Mitigation Measure 4.3-1b includes several measures that would serve to reduce noise associated with such sources, including prohibition of artificial noisemakers, implementation of noise-reducing design features on the bleachers and ramps, and requesting that attendees depart quietly after events. The significant and unavoidable impact associated with stadium event noise identified in the Draft EIR captures the potential impacts associated with these noise sources that are not easily controlled by the maximum public address system level established in Mitigation Measure 4.31-b.

Comment O4C-19 Response: As the commenter acknowledges, Mitigation Measure 4.3-1b requires that use of the public address system, amplified music, and band activity shall cease after 10:00 PM if an event extends beyond 10:00 PM. Therefore, the commenter's suggestion that a remote monitoring system be programmed with a trigger threshold lower than 70 dBA to capture any use of the public address system after 10:00 PM is not necessary and would not further reduce noise, as Mitigation Measure 4.3-1b already prohibits use of the public address system after 10:00 PM. No changes to the Draft EIR are required.

Comment O4C-20 Response: As outlined in comment response O4C-18, the District cannot exert absolute control over all crowd noise. The maximum public address system limit of 70 dBA is intended specifically to control noise from the public address system and does not apply to other stadium event noise sources, including artificial noisemakers. The significant and unavoidable impact associated with

stadium event noise identified in the Draft EIR captures the potential impacts associated with these noise sources that are not easily controlled by the maximum public address system level. No changes to the Draft EIR are required.

Comment O4C-21 Response: This comment restates text from Mitigation Measure 4.3-1b. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4C-22 Response: As outlined in comment response O4C-13, the Draft EIR includes spectator-generated bleacher noise as a source of noise during football games and because the reference measurements do not isolate bleacher-generated noise, the analysis does not assign an unsupported source-specific sound level or assume a numerical reduction from an unselected treatment. The significant and unavoidable operational noise impact associated with stadium noise therefore includes spectator-generated bleacher noise, which would be reduced through implementation of Mitigation Measure 4.3-1b. The Draft EIR does not attempt to take credit for quantifiable reductions associated with noise-reducing treatments applied to the bleachers. Clarifying edits are made to Mitigation Measure 4.3-1b to specifically mention that noise-reducing features may include sound-deadening treatment on the underside of seating and floorboards, as shown in Chapter 3, "Errata", of this Final EIR.

Comment O4C-23 Response: This comment notes potential noise dampening material treatments for bleacher seats and floorboards. A review of noise-reducing design features will be conducted as part of the bleacher design for the Project. The commenter's suggested materials are noted.

The commenter is correct that "because all of these treatments would be applied to the undersides of the bleachers, the grounds the Draft EIR gives for finding step-surface treatments infeasible (durability, weather exposure, maintenance, or safety) would not apply." The exemption for noise-reducing treatments, as outlined in Draft EIR Mitigation Measure 4.3-1b, is specifically for bleacher step surfaces where application of noise-reducing treatments on such surfaces may be infeasible due to durability, weather exposure, maintenance, or safety concerns. No changes to the Draft EIR are required.

Comment O4C-24 Response: This comment provides a description and visual representation of where sound absorbing walls could be. The commenter's suggestions are noted. Absorptive or shielding material along bleacher sides is one option included in Mitigation Measure 4.3-1b as a noise-reducing design feature that would be considered as part of the Project's bleacher design, with the design of such features evaluated to ensure that they would not interfere with safety, drainage, accessibility, maintenance, or spectator sightlines. A review of noise-reducing design features will be conducted as part of the bleacher design for the Project. In addition, Mitigation Measure 4.3-1b has been refined to add additional details consistent with the comment. These edits are reflected in Chapter 3, "Errata," to this Final EIR.

Comment O4C-25 Response: Please refer to comment response O4C-6 regarding the sources of noise evaluated in the Draft EIR. As noted by the commenter, the Draft EIR ultimately found that impacts associated with stadium event noise would be significant and

unavoidable with implementation of mitigation. No changes to the Draft EIR are required.

Comment O4C-26 Response: Please refer to comment responses O4C-12 and O4C-13 regarding noise sources included in the Draft EIR, including band activity and foot stomping. Please refer to comment responses O4C-14 and O4C015 regarding noise associated with automobile use.

Comment O4C-27 Response: Please refer to comment response O4C-11 regarding how the representative acoustical-center approach applied in the Draft EIR provides a simplified screening evaluation of stadium-event noise propagation.

Comment O4C-28 Response: Please refer to comment response O4C-18, O4C-19, and O4C-20 regarding why a remote noise monitoring system would not further reduce stadium event noise associated with the Project. As outlined in comment responses O4C-23 and O4C-24, a review of noise-reducing design features will be conducted as part of the bleacher design for the Project. Because the specific noise-reducing features will be determined as part of bleacher design and the associated potential reductions are not known at this time, and because the reference measurements do not isolate bleacher-generated noise, the Draft EIR does not assign an unsupported source-specific sound level or assume a quantitative reduction from implementation of noise-reducing features outlined in Mitigation Measure 4.3-1b. No changes to the Draft EIR are required.

Comment O4C-29 Response: This comment provides technical data sheets for noise-reducing treatment options. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4C-30 Response: This section presents the commentor's professional qualifications and does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

COMMENT LETTER O4D. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT D; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4D. Rio Americano Community Alliance, Attachment D

Comment O4D-1 Response: The Project's *Vehicle Miles Travelled Analysis* does not understate the Project's VMT impact because it evaluates the highest new VMT producing event to be hosted at the improved Rio American Stadium under Project conditions. The *Vehicle Miles Travelled Analysis* is based on observed attendance data for a "conservative event" scenario reflective of rivalry-game attendance, and the reduction in trip distances and trip rates that would occur under Project conditions due to football games and other community events being hosted more centrally located to Rio Americano students, family members, and other event attendees. Regarding why 'typical' game attendance was assumed to have potential to increase if hosted at Rio Americano High School rather than an off-site location, but the 'peak' event was not assumed to increase due to a change in location, 'typical' games may have lower attendance because it's at a neutral campus, whereas the home campus could attract new attendees; however, the rival game already attracts most of the attendees that would come regardless of location. Specifically, the maximum ticket sales of any game from 2024 and 2025 was 3,301 (noting additional non-ticketed attendees and participants) at El Camino High School in which the capacity is 4,000; this demonstrates that, even with additional capacity, this is generally the maximum anticipated level of attendance at a rivalry game and the actual max two-year event was not at all affected by seating capacity. Furthermore, the project proposes 2,575 as the seating capacity, but the Draft EIR evaluates the max attendance at 3,400, which would account for additional attendees under a standing-room-only condition, and likely result in a natural cap of attendees. Please refer also to comment response O4D-15 regarding the commenter's statement regarding recalculated VMT and Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance and associated VMT. No changes to the Draft EIR are required.

Comment O4D-2 Response: Doubling trip generation is not supported. Doubling the general-event trip generation (823 inbound vehicles) under Project conditions would equate to 1,646 inbound vehicles, or roughly 3,900 attendees at the observed occupancy rate of 2.36 persons per vehicle. That is more than the highest attendance recorded in the last two seasons (3,397). The commenter provides no data showing that typical or highest attendance games would reach that level. Please refer also to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance and why parking availability does not limit trip generation. No changes to the Draft EIR are required.

Comment O4D-3 Response: The Synchro analysis conducted as part of the *Local Transportation Analysis* and all reported delay and queue results correctly use the 5:30–6:30 PM volumes. The background (existing) traffic volumes shown in Exhibit 2 of the *Local Transportation Analysis* are the 3:00–4:00 PM school peak-hour counts, even though the exhibit legends say "5:30–6:30 PM". This is a display error in the exhibits, not an error in the analysis. The *Local Transportation Analysis* states that "intersection turning movement data reflecting conditions from 5:30 PM – 6:30 PM was used to establish the Existing (2025) baseline operations" (LTA p.

2), and the Synchro worksheets in *Local Transportation Analysis* Attachments B, E, F, and G use those volumes. None of the analysis results or conclusions change with the updates to the exhibit legends.

The 5:30 – 6:30PM background period is appropriate for analyzing Friday evening games because games would not overlap with school-peak volumes that occur at 3:00 – 4:00 PM associated with student dismissal and pick-up. Additionally, this approach is conservative because background traffic is higher at 5:30-6:30PM than during actual arrivals to games (6:30 – 7:45PM). As shown in Attachment A of *Local Transportation Analysis*, at Intersection 3 (location), 15-minute vehicle volumes fall through the early evening (157 vehicles at 5:00 PM, 141 at 5:15 PM, 124 at 5:30 PM, 105 at 5:45 PM, 127 at 6:00 PM, and 66 at 6:15 PM). Therefore, background traffic during the observed 6:30–7:45 PM arrival window would be the same or lower than the 5:30–6:30 PM volumes used. Furthermore, even though the NDS survey shows arrivals spread over at least 75 minutes, with the busiest hour (6:45–7:45 PM) carrying about 80 percent of observed arrivals (452 of 564 vehicles), concentrating all inbound vehicle arrivals in the single hour used in the analysis (5:30 – 6:30PM) on top of 5:30–6:30 PM background traffic overstates peak-hour volumes compared with observed arrival patterns.

The commenter adds up the inbound project volumes at Intersection 3 and Intersection 4 (Project Driveways 2 and 3) shown in Exhibit 4. The commenter treats that total (657 vehicles) as the number of vehicles parking in Lots 4 and 5 (371 spaces combined) and concludes that 286 vehicles would be "turned away" and not accounted for. Exhibit 4 shows where vehicles enter campus, not where they park. Trip assignment in a traffic study places project trips on the roadway network and at the access points vehicles use to enter the site. It does not model which parking stall each vehicle uses. Project Driveway 2 at Saverien Drive is the main campus entrance and the *Local Transportation Analysis* and Mitigation Measure 4.4-3c route most attendees through it. After entering, vehicles move through the campus's internal parking connections to all available on-campus parking. This includes Lots 3, 4, and 5, the internal connections between Lots 4 and 5, and the Lot 6 overflow area. Lot 2 is reached from Driveway 1, as outlined in Mitigation Measure 4.4-3c. The full on-campus event supply is 672 spaces (*Local Transportation Analysis* Table 14). All inbound vehicles are counted at the study intersections, including those that park off-site. The *Local Transportation Analysis* assigns all 823 inbound general-event vehicles to the study intersections. That includes the roughly 151 vehicles expected to park on American River Drive and Saverien Drive because on-campus demand exceeds supply (*Local Transportation Analysis* Tables 14 and 15). Assigning these vehicles to campus driveways at the main entrance loads Intersection 3 more heavily than if some were assigned directly to on-street parking. Their trips are therefore included in the intersection analysis and *Local Transportation Analysis*.

No changes to the Draft EIR are required.

Comment O4D-4 Response: A permanent signal is not warranted or needed. California Manual on Uniform Traffic Control Devices signal warrants are based on average-day volumes. On a typical Friday evening, Intersection 3 operates at LOS A with about 9 seconds of delay (refer to *Local Transportation Analysis,* Table 1), and

traffic associated with a maximum event under the Project would occur for only a few nights a year. Implementation of Mitigation Measures 4.4-3b and 4.4-3c would require staffed traffic control at key intersections (refer to *Local Transportation Analysis,* Exhibit 12), which allows for better adjustments to short-term surges in traffic than a fixed signal.

Under Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), automobile delay, as measured by LOS or similar measures of vehicular capacity or congestion, is not a significant environmental impact. The intersection delay and queuing analysis in the *Local Transportation Analysis* is used to identify operational conditions that could create hazards, such as vehicle queues spilling into through lanes, bike lanes, or crosswalks, or blocking emergency access. Those are the conditions Mitigation Measures 4.4-3a through 4.4-3c address. Comments about delay or LOS by themselves do not identify a significant impact under CEQA.

Please refer to comment response O4D-3 regarding the *Local Transportation Analysis*'s correct use of vehicle volumes during the 5:30 – 6:30 PM being a display errorr. The commenter's LOS F adds game traffic under the Project (5:30 PM – 6:30 PM) to the school dismissal peak (3:00 PM – 4:00 PM), a condition that does not occur. The *Local Transportation Analysis* already discloses LOS F at Intersection 3 for conservative events (147 seconds; LTA Table 8), and potential impacts, including hazards associated with transportation and circulation are addressed by Mitigation Measures M 4.4-3a through 4.4-3c.

Mitigation at this location is not limited to crosswalk markings. Mitigation Measure 4.4-3b requires designated crossings with treatments, which may include nighttime lighting, warning signs, and advance yield or stop lines, plus event staff where conflicts are expected. Mitigation Measure 4.4-3c requires staffed traffic control. Minor revisions are made to Mitigation Measures 4.4-3b and 4.4-3c to clarify implementation procedures, have clear performance standards, and limit event attendance associated with proposed stadium improvements to 3,400; these revisions are shown in Chapter 3, "Errata," to this Final EIR.

Please refer also to Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

No additional changes to the Draft EIR are required.

Comment O4D-5 Response: The 23 percent share (noted by the commenter) and 30 percent share (documented in the *Local Transportation Analysis*) of Project traffic along Saverien Drive describes school-dismissal traffic, which is mostly local pick-up and through traffic observed to occur between 3:00 PM – 4:00 PM. Evening game attendees, including about 500 visiting fans, arrive from the regional network by Fair Oaks Boulevard and Saverien Drive, the most direct route to the main entrance (*Local Transportation Analysis* p. 5, Exhibit 3). The 60 percent share of Project traffic used in the *Local Transportation Analysis* is also conservative because it places more traffic at Intersections 3 and 6.

Saverien Drive has no posted parking restrictions, and parking there is legal today (refer to *Local Transportation Analysis*, Table 15, note 2). Saverien Drive accounts for 73 of the 327 off-site spaces (refer to *Local Transportation Analysis*, Table 15, Segments 005 and 006). Additionally, Mitigation Measure 4.4-3b requires that the Event Transportation Management Plan to "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" (Draft EIR p. 4.4-15). Therefore, the commenter's concerns about vehicles parking along Saverien Drive are unsupported. Please refer also to Master Response 6: Parking Availability and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Please refer to Comment O4D-19 Response regarding how graduation and other community events were included in the VMT analysis.

No changes to the Draft EIR are required.

Comment O4D-6 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4D-7 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O4D-8 Response: The vehicle occupancy rate of 2.36 persons per vehicle is conservative. The 2.36 persons per vehicle used in the analysis was observed at a Rio Americano home game as documented in Attachment D of the *Local Transportation Analysis.* It is lower than the occupancies observed at comparable high school stadium events, as described in the Draft EIR (p. 4.4-6): 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. A lower occupancy rate produces more vehicles per attendee, so using 2.36 overstates vehicle trips and parking demand compared with the other observed rates. The commenter's statement that "more people will drive" at Rio Americano is not supported by data. Moving games to the students' own campus makes walking, biking, and staying on campus after school (e.g., to watch the junior varsity game) more practical, not less. The comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. No changes to the Draft EIR are required.

Comment O4D-9 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-10 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-11 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-12 Response: The commenter acknowledges that ITE does not publish a trip rate for a lighted high school stadium with a press box and bleachers. For land uses that ITE does not represent, the standard practice is to use local empirical data, and that is what the Project's Local Transportation Analysis did. The comment does not pertain to the adequacy of the environmental analysis in the Draft EIR. No changes to the Draft EIR are required.

Comment O4D-13 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Travelled regarding the development of Project trip generation estimates.

Comment O4D-14 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance and associated VMT. Refer also to comment response O4D-1. No changes to the Draft EIR are required.

Comment O4D-15 Response: The commenter attempts to recalculate VMT using the "general event" attendance under existing conditions (1,669) and Project conditions (2,200) and the methods and inputs in the VMT analysis, including application of the same level of visitor attendance under both conditions (500), percent of home attendees assumed to walk or bike (15 percent), and trip distances (as shown in the *Vehicle Miles Travelled Analysis,* Table 3). The commenter's recalculated VMT results in 11,170 VMT for existing conditions and 12,610 VMT for Project conditions. Most of the commenter's calculated increase comes from a deliberately conservative visitor-trip assumption. In the Project's *Vehicle Miles Travelled Analysis,* all visiting attendees were conservatively assumed to travel from Inderkum High School, the league opponent whose trip distance increases the most when the game moves to Rio Americano (12.8 miles to El Camino compared with 15.3 miles to Rio Americano; *Vehicle Miles Travelled Analysis,* Table 3, note 1). Therefore, the commenter's application of the same visitor attendee rate as used the "conservative event" scenario to their recalculation using the total "typical event" attendance rates accounts for about 1,060 of the 1,440 VMT increase. When visitor distances are averaged across the league opponents in *Vehicle Miles Travelled Analysis,* Table 2, the average trip is the same to either venue (about 14.0 miles).

The Project's *Vehicle Miles Travelled Analysis* compares the highest-attended home game at El Camino High School (3,301 attendees) with the same game at Rio Americano under a rounded-up, conservatively high attendance of 3,400. This approach captures the largest VMT-generating event, and it assumes attendance increases with the change in location of games to Rio Americano. The rounded-up use of the actual recorded attendance for the highest attendance game of 2024 and 2025 is made more conservative by the fact that the proposed capacity for Rio Americano High School is less than the capacity at El Camino High School. The commenter's recalculation instead compares an observed existing average (1,669) with a Project estimate that adds a 32-percent attendance buffer (2,200). That buffer was developed for the purposes of the *Local Transportation Analysis,* to stress-test local intersection, queuing, and parking operations under a typical event scenario. The buffer is appropriate for an

operations analysis, where more attendees produce more conservative results. It is not a forecast of new regional vehicle travel.

Therefore, estimating the net change in VMT based on application of an attendance buffer that was developed for evaluating local intersection, queuing, and parking operations is not appropriate. The Project's *Vehicle Miles Travelled Analysis* appropriately evaluates the highest VMT-generating event and calculates a net reduction of 2,098 game-day VMT because moving existing varsity home games from El Camino High School to Rio Americano shortens the average home-attendee trip distance (5.8 miles to 5.0 miles), and because some home attendees would walk, bike, or already be on campus. No changes are required in the Draft EIR.

Comment O4D-16 Response: Table 3 of the *Vehicle Miles Traveled Analysis* multiplies vehicles by the average one-way distance and by 2 (the trip to and from the game), using unrounded distances. The distances shown are rounded to one decimal place. Using the rounded values, existing VMT is approximately19,170 and project VMT is about 16,920, still resulting in a net reduction in VMT with the Project. A note is added to Table 3 to detail this; edits are shown in Chapter 3, "Errata", of this Final EIR.

Comment O4D-17 Response: The commenter is correct that the values in Table 2 of the *Vehicle Miles Traveled Analysis* are one-way trip distances. The title of Table 2 is revised to clarify that the distances shown are one-way distances; edits are shown in Chapter 3, "Errata", of this Final EIR.

Comment O4D-18 Response: The conclusion of the *Vehicle Miles Traveled Analysis* does not rely on the 230-trip screening criterion. Because the Project would relocate existing events and would not generate new events, a quantitative analysis was completed (*Vehicle Miles Traveled Analysis* p. 4), and the Draft EIR conclusion rests on its 2,098-VMT net reduction (Draft EIR Impact 4.4-2, p. 4.4-11). A clarifying edit has been made in the *Vehicle Miles Traveled Analysis;* edits are shown in Chapter 3, "Errata", of this Final EIR.

Comment O4D-19 Response: The Project's *Vehicle Miles Travelled Analysis* describes that the Project would accommodate other potential school events such as graduation and that a varsity home football game was identified as the highest new VMT producing event under Project conditions. Draft EIR Section 4.4, "Transportation and Circulation" (page 4.4-10) further describes that the Project could accommodate graduation, occasional assemblies, and school-sanctioned community events 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. Additionally, as described in Draft EIR Section 4.4, "Transportation and Circulation" (page 4.4-10), attendance of such events 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, as used in the Project's VMT analysis. The *Localized Transportation Analysis* (p. 7) also estimated attendance associated with graduation being hosted at Rio Americano under Project conditions as 3,400 people. Therefore, the Project's

evaluation of the highest new VMT producing event (football games) is appropriate, as graduation and other school-sanctioned community events would result in the same or lower attendance. No changes to the Draft EIR are required.

Comment O4D-20 Response: The 23-percent share (noted by the commenter) and 30-percent share (documented in the *Local Transportation Analysis*) of Project traffic along Saverien Drive describes school-dismissal traffic, which is mostly local pick-up and through traffic observed to occur between 3:00 PM – 4:00 PM. Evening game attendees, including about 500 visiting fans, arrive from the regional network by Fair Oaks Boulevard and Saverien Drive, the most direct route to the main entrance (*Local Transportation Analysis* p. 5, Exhibit 3). The 60-percent share of Project traffic used in the *Local Transportation Analysis* is also conservative because it places more traffic at Intersections 3 and 6. No changes to the Draft EIR are required.

Comment O4D-21 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-22 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-23 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-24 Response: The comment summarizes data collected by the commenter. This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment O4D-25 Response: The *Localized Transportation Analysis* (p. 4) explains that the increase in typical game attendance (32 percent) is because of "…games being held on campus and therefore becoming more readily accessible for students and local members of the Rio Americano High School community". The *Localized Transportation Analysis* evaluated both this general-event scenario and the conservative event scenario of 3,400 attendees. As explained in Master Response 5: Trip Generation and Vehicle Miles Traveled, attendance is driven by the matchup (e.g., the rivalry, the visiting school's distance and following) rather than parking supply. Please see also Master Response 5: Trip Generation and Vehicle Miles Traveled regarding the basis for the Project trip generation estimates. No changes to the Draft EIR are required.

Comment O4D-26 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding why parking availability does not limit VMT.

Comment O4D-27 Response: Please refer to comment Response O4D-3.

Comment O4D-28 Response: Please refer to comment Response O4D-3.

Comment O4D-29 Response: Please refer to comment Response O4D-3.

Comment O4D-30 Response: As described in comment response O4D-3, background traffic is higher at 5:30-6:30PM than during actual arrivals to games (6:30 – 7:45PM). No changes to the Draft EIR are required.

Comment O4D-31 Response: The comment summarizes vehicle volumes from the *Localized Transportation Analysis* and the number of parking spaces in Lots 4 and 5. As described in comment response O4D-3, trip assignment in a traffic study places project trips on the roadway network and at the access points vehicles use to enter the site. It does not model which parking stall each vehicle uses. After entering, vehicles move through the campus's internal parking connections to all available on-campus parking. All inbound vehicles are counted at the study intersections, including those that park off-site. No changes are required to the Draft EIR.

Comment O4D-32 Response: Potential impacts at the impacted intersection of American River Drive and Saverien Drive are not addressed through markings and parking restrictions on crosswalk approaches alone. Mitigation Measure 4.4-3b requires designated crossings with treatments, which may include nighttime lighting, warning signs, and advance yield or stop lines, in addition to event staff where conflicts are expected. In accordance with Mitigation Measure 4.4-3c, the District must have an Event Management Plan on file by the start of the school year in the project's first year of operation, one part of which addresses transportation and circulation. A qualified professional must prepare it using recognized special-event and traffic-control guidance. The transportation and circulation section of the Event Management Plan must include minimum sections on event determination, parking, access and internal circulation, traffic control and staffing, pedestrian and bicycle safety, emergency access, communication, and monitoring and corrective action. If monitoring finds problems, the plan must be revised and corrective actions taken. Additionally, Mitigation Measure 4.4-3c has been revised with clarifying edits to outline specific requirements for the Event Management Plan; these edits are shown in Chapter 3, "Errata", of this Final EIR. While the *Local Transportation Analysis* cites FHWA guidance that the listed pedestrian countermeasures should "always be considered," for the roadway configuration of the intersection of American River Drive and Saverien Drive, these measures, in addition to others as described above, are incorporated in Mitigation Measures 4.4-3b and 4.4-3c.

Comment O4D-33 Response: A permanent signal is not warranted nor needed. California Manual on Uniform Traffic Control Devices signal warrants are based on average-day volumes. On a typical Friday evening, Intersection 3 operates at LOS A with about 9 seconds of delay (refer to *Local Transportation Analysis,* Table 1), and traffic associated with a maximum event under the Project would occur for only a few nights a year. Implementation of Mitigation Measures 4.4-3b and 4.4-3c would require staffed traffic control at key intersections (refer to *Local Transportation Analysis,* Exhibit 12), which allows for better adjustments to short-term surges in traffic than a fixed signal.

Under Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), automobile delay, as measured by LOS or similar measures of vehicular capacity or congestion, is not a significant environmental impact. The intersection delay and queuing analysis in the *Local Transportation Analysis*

is used to identify operational conditions that could create hazards, such as vehicle queues spilling into through lanes, bike lanes, or crosswalks, or blocking emergency access. Those are the conditions Mitigation Measures 4.4-3a through 4.4-3c address. Comments about delay or LOS by themselves do not identify a significant impact under CEQA.

Comment O4D-34 Response: Please refer to comment Response O4D-3 regarding the *Local Transportation Analysis*'s correct use of vehicle volumes during the 5:30 – 6:30 PM period being a display error. The commenter's LOS F adds game traffic under the Project (5:30 PM – 6:30 PM) to the school dismissal peak (3:00 PM – 4:00 PM), a condition that does not occur. The *Local Transportation Analysis* already discloses LOS F at Intersection 3 for conservative events (147 seconds; LTA Table 8), and the resulting hazards are addressed by Mitigation Measures M 4.4-3a through 4.4-3c. As outlined in comment response O4D-33 response, LOS is not a significant environmental impact. No changes to the Draft EIR are required.

Comment O4D-35 Response: Under Public Resources Code Section 21099(b)(2) and CEQA Guidelines Section 15064.3(a), automobile delay, as measured by level of service (LOS) or similar measures of vehicular capacity or congestion, is not a significant environmental impact. The Draft EIR evaluates transportation impacts based on conflicts with plans and policies (Impact 4.4-1), VMT (Impact 4.4-2), hazards (Impact 4.4-3), and emergency access (Impact 4.4-4). The intersection delay and queuing analysis in Draft EIR Appendix E, "Local Transportation Analysis" is used to identify operational conditions that could create hazards, such as vehicle queues spilling into through lanes, bike lanes, or crosswalks, or blocking emergency access. Those are the conditions Mitigation Measures 4.4-3a through 4.4-3c address. Comments about delay or LOS by themselves do not identify a significant impact under CEQA. No changes to the Draft EIR are required.

Comment O4D-36 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding the basis of the Project trip generation estimates.

Comment O4D-37 Response: Draft EIR Section 4.4, "Transportation and Circulation" (pp. 4.4-10 through 4.4-11) explains that because games held at Rio Americano High School 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. No changes to the Draft EIR are required.

Comment O4D-38 Response: The difference in existing and Project conditions trips shown in Table 3 of the *Vehicle Miles Travelled Analysis* the commenter is referring is due to the accounting of attendees that can walk, bike, or remain on campus after school and would therefore not drive to the games, as shown in Table 2 of the *Vehicle Miles Travelled Analysis.* The *Vehicle Miles Travelled Analysis* is an analysis of how regional VMT would change with implementation of the Project, which would not add new football games or other community events, but would rather relocate existing events already occurring elsewhere to Rio Americano High

School. Project effects on traffic in the vicinity of the Project site are evaluated in the *Local Transportation Analysis.* No changes to the Draft EIR are required.

Comment O4D-39 Response: The *Vehicle Miles Travelled Analysis* and the less-than-significant VMT impact is based on a maximum potential event scenario of 3,400 attendees, based on the Rio Americano vs Jesuit rivalry game that occurred August 2025. The *Vehicle Miles Travelled Analysis* (Table 1) acknowledges the increase in attendance between existing conditions and Project conditions, as appropriate. As outlined in Response O4D-37, the reduction in VMT under Project conditions, even with the increase in attendance, is due to a reduction in trip distances and trip rates because of games now being held 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.

The *Localized Transportation Analysis* also evaluated the "conservative event" scenario at 3,400 attendees. The *Localized Transportation Analysis* also accounted for an increase in typical attendance to account for moving games on campus. The *Localized Transportation Analysis* did not assume typical attendance would stay at the observed 1,669 average. It raised the "general event" attendance to 2,200 people (about 32 percent above the observed average). The LTA explains this is because on-campus games become "more readily accessible for students and local members of the Rio Americano High School community" (LTA p. 4); see also response to Comment O4D-1. For comparison, the Jesuit High School Stadium Lighting EIR assumed regular-season attendance would increase about 25 percent (from 1,200 to 1,500) when games moved to Friday nights under new lights.

Therefore, the VMT and LTA analyses and Draft EIR did account for an increase in attendance with the move in game location to Rio Americano High School. No changes to the Draft EIR are required.

Comment O4D-40 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding how increased attendance under Project conditions was accounted for.

Comment O4D-41 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding how increased attendance under Project conditions was accounted for.

Comment O4D-42 Response: Event management limits re-circulation. Mitigation Measures 4.4-3b and 4.4-3c require event staff at campus access points, "lot full" signs once capacity is reached, designated off-site parking locations, and advance information to attendees about where to park. These measures direct drivers to available parking before they enter a full lot, which limits the re-circulation the commenter describes. Re-circulation would not meaningfully affect VMT. Even if every vehicle that cannot park on campus drove an extra half mile looking for parking, that would add about 75 VMT for a general event (151 vehicles) or about 310 VMT for a conservative event (623 vehicles). That is small compared with the 2,098-VMT net reduction reported in the *Vehicle Miles Travelled Analysis* and

would not change the identified less-than-significant VMT conclusion. Mobile source emissions were estimated as outlined in Impact 5.2-2 in Draft EIR Section 5.2, "Air Quality" and as shown in Table 5.2-2, operational emissions were found to be well below the thresholds of significance recommended by the Sacramento Metropolitan Air Quality Management District. The minimal level of VMT noted above for vehicles having to drive to look for parking would not cause mobile source emissions to exceed thresholds. Additionally, as explained in Impact 5.2-3, the peak vehicle volumes associated with Project conditions would not cause air quality concerns related to carbon monoxide hotspots.

The commenter states that "[t]he traffic coming at 6 to 9 pm will be an addition". As described in comment response O4D-3, background traffic is higher at 5:30-6:30PM than during actual arrivals to games (6:30 – 7:45PM) and concentrating all inbound vehicle arrivals in the single hour used in the analysis (5:30 – 6:30PM) on top of 5:30–6:30 PM background traffic overstates peak-hour volumes compared with observed arrival patterns. Additionally, post-game departures occur late in the evening, when background traffic is lower. Therefore, the additional traffic the commenter refers to is accounted for in the analysis. Please refer also to Master Response 5: Trip Generation and Vehicle Miles Traveled regarding how increased attendance under Project conditions was accounted for. No changes to the Draft EIR are required.

Comment O4D-43 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance and why parking availability does not limit VMT.

Comment O4D-44 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance.

Comment O4D-45 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled regarding why parking availability does not limit VMT.

Comment O4D-46 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled regarding why parking availability does not limit VMT.

Comment O4D-47 Response: Saverien Drive has no posted parking restrictions, and parking there is legal today (refer to *Local Transportation Analysis*, Table 15, note 2). Saverien Drive accounts for 73 of the 327 off-site spaces (refer to *Local Transportation Analysis*, Table 15, Segments 005 and 006). Additionally, Mitigation Measure 4.4-3b requires that the Event Transportation Management Plan to "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" (Draft EIR p. 4.4-15). Therefore, the commenter's concerns about vehicles parking along Saverien Drive are unsupported. Please refer also to Master Response 6: Parking Availability and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment O4D-489 Response: Please refer to comment response O4D-47.

Comment O4D-49 Response: Please refer to Master Response 5: Trip Generation and Vehicle Miles Traveled.

Comment O4D-50 Response: The *Local Transportation Analysis* reflects trip generation in the vicinity of Rio Americano High School under both a general-event scenario, which accounted for a 32 percent increase in attendance from historical average attendance, and a conservative event scenario. Therefore, the *Local Transportation Analysis* already evaluates the rivalry-game attendance the commenter recommends. This scenario covers the rivalry game, graduation, and other peak events (*Local Transportation Analysis* Tables 7 through 10 and 16 through 17; Draft EIR Section 4.4, "Transportation and Circulation", Impact 4.4-3). The results of the *Local Transportation Analysis* for the "conservative event" scenario, including LOS F operations at the intersection of the Project Driveway/American River Drive and Saverien Drive (147 seconds of delay) and a westbound left-turn queue of about 1,055 feet at Fair Oaks Boulevard/Saverien Drive, are disclosed in the Draft EIR (p. 4.4-14) and are the basis for Mitigation Measures 4.4-3a through 4.4-3c. No changes to the Draft EIR are required.

Comment O4D-51 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled regarding projected attendance.

Comment O4D-52 Response: As outlined in comment response O4D-3, the *Local Transportation Analysis* did use the appropriate peak time period for Project conditions. Comment response O4D-2 explains why doubling project trip generation is not supported or reflective of anticipated Project conditions. Please refer also to Master Response 5: Trip Generation and Vehicle Miles Travelled regarding projected attendance.

Comment O4D-53 Response: The NDS survey measured vehicle occupancy and was not a count of all attendees. As shown in Attachment D to the *Local Transportation Analysis,* the NDS survey recorded people per vehicle for vehicles arriving from 6:30 to 7:45 PM and did capture earlier or later arrivals, drop-offs, walk-ins, or buses. The attendance data presented in Attachment C to the *Local Transportation Analysis* is based on District records for ticket sales. No changes to the Draft EIR are required.

Comment O4D-54 Response: This section presents the commentor's professional qualifications and does not pertain to the adequacy of the environmental analysis contained in the Draft EIR.

COMMENT LETTER O4E. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT E; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4E. Rio Americano Community Alliance Attachment E

Comment O4E-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER O4F. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT F; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4F. Rio Americano Community Alliance, Attachment F

Comment O4F-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER O4G. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT G; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4G. Rio Americano Community Alliance, Attachment G

Comment O4G-1 Response: The District acknowledges that the Draft EIR did not include a separate summary of individual NOP comments or a cross-reference table. This was an error in the Draft EIR's description. CEQA Guidelines Section 15083 requires the lead agency to consider input received during scoping to inform the scope and content of the EIR, but there is no requirement to respond in writing to each scoping comment or to provide a summary or matrix of where each issue is addressed. All scoping comments received were reviewed and considered in the preparation of the Draft EIR. The EIR addresses the relevant environmental issues raised during scoping in the appropriate technical sections. Please see Response to Comment O4-1 through O4-226, which address the topics raised in this attachment to the comment letter.

COMMENT LETTER O4H. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT H; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4H. Rio Americano Community Alliance, Attachment H

Comment O4H-1 Response: Please see Master Response 10: Project Description for a detailed explanation on why the District's previous stadium improvements project that it approved in 2010 but ultimately did not construct is not relevant to the proposed project or this EIR's analyses.

COMMENT LETTER O4I. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT I; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4I. Rio Americano Community Alliance, Attachment I

Comment O4I-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER O4J. RIO AMERICANO COMMUNITY ALLIANCE, ATTACHMENT J; JASON HOLDER, COUNSEL; OCTOBER 16, 2026

Response to Comment Letter O4J. Rio Americano Community Alliance, Attachment J

Comment O4J-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER O5. SACRAMENTO AREA COUNTY CREEK, MARK BAKER, TREASURER; OCTOBER 2, 2026

Response to Comment Letter O5. Sacramento Area County Creek

Comment O5-1 Response: As stated in Draft EIR Section 3, "Project Description" (pages 3-1 and 3-4), the proposed project would include an increase in the amount of available bleacher seating from approximately 288 people (under existing conditions) to 2,575 people. The Draft EIR evaluates the potential environmental impacts associated with project-related noise, lighting, and traffic in Section 4.3, "Noise and Vibration," Section 4.1, "Aesthetics," and Section 4.4, "Transportation and Circulation." Impacts associated with biological resources are evaluated in Draft EIR Section 4.2, "Biological Resources," and impacts associated with recreation are evaluated in Draft EIR Section 5.13, "Recreation." No significant impacts to the American River Parkway were identified in the Draft EIR from project-related noise, lighting, traffic, or recreation. Feasible mitigation measures that address construction-related impacts to biological resources are included in the Draft EIR (pages 4.2-22 and 4.2-23), which would reduce these potentially significant biology impacts to a less-than-significant level.

Comment O5-2 Response: Feasible mitigation measures to reduce the project's construction- and operation-related impacts are included throughout all of the topic areas evaluated in the Draft EIR, where necessary. As explained in Draft EIR Section 7.4, "Significant and Unavoidable Adverse Impacts," the only impact that would remain significant and unavoidable even after the implementation of all feasible mitigation measures would be generation of a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards (i.e., temporary short-term construction noise, and operational stadium event noise). With regards to impacts on wildlife and habitat in the American River Parkway, please see response to comment I1-1.

Comment O5-3 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment O5-4 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; nevertheless, the District responds as follows. Raider Stadium is an existing outdoor track and field facility with bleacher seating, scoreboard, and public address system, at the Rio Americano High School Campus. Although the proposed permanent stadium lighting and additional bleacher seating would allow for increased attendance at and additional use of the stadium at night for events (particularly football games, as shown in Draft EIR Table 3-1 [page 3-9]), attendance numbers ranging from 1,500–3,400 people on five to eight evenings per year, and on one day of the year during graduation ceremonies, does not represent a high-intensity sports and event facility. High-intensity facilities are used daily by hundreds or thousands of people for league play, or are associated with college stadiums such as Sacramento State University (which accommodates 21,195 seats). As stated on Draft EIR page 6-5, Rio Americano High School was originally constructed in 1963, and the track and 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 additional improvements to the stadium were completed in 2019. See also, Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O5-5 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O5-6 Response: The commenter does not identify or provide any suggestions related to what other alternative he believes should be evaluated, that is different from the alternatives presented and evaluated in Draft EIR Section 6, "Alternatives," nor does the commenter identify how such an alternative would reduce stadium event noise from increased attendance to a less-than-significant level. As explained in Draft EIR Section 6, "Alternatives," the only alternative available that would result in less-than-significant noise impacts from stadium event noise would be the No Project Alternative. Under this 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. Please see also Master Response 6, Alternatives. No changes to the Draft EIR are required.

Comment O5-7 Response: As stated on Draft EIR page 4.3-15, the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element. Please see the detailed discussion related to the use of the Sacramento County Noise Ordinance standards as CEQA thresholds for the proposed project, contained in Draft EIR Section 4.3, "Noise and Vibration," on pages 4.3-15 and 4.3-16. Please also see Master Response 1 regarding consistency with applicable zoning and other regulations governing land use.

Comment O5-8 Response: Draft EIR Section 4.1, "Aesthetics," contains 26 pages of detailed, meaningful analyses that evaluate the project's potential to create glare and skyglow, as well as a light spectrum (photometric) analysis performed by Musco Lighting which is discussed throughout the text of Section 4.1 and attached to the Draft EIR as Appendix B. Draft EIR Section 4.1 presents information related to the American River Parkway and the project's potential effects on the Parkway, including photos of existing conditions and visual simulations showing conceptual the views of the project site with the proposed stadium lighting as viewed from the Parkway at dusk and in full darkness. As noted in Draft EIR Section 4.1, "Aesthetics" and Section 5.13, "Recreation," the American River Parkway is closed to any type of use after dark; parkway facilities and trails are only available for public use from sunrise to sunset throughout the year. The commenter has not specified any type of additional analyses that he believes should have been included in the Draft EIR aesthetics analysis, nor does the commenter present any disagreement with the impact conclusions reached in the Draft EIR aesthetics section or with Musco Lighting's Photometric Analysis attached as Draft EIR Appendix B.

The comment also states that the EIR should "require lighting designed to achieve the greatest practical reduction in nighttime light impacts, consistent with DarkSky principles and wildlife-sensitive lighting practices."

Please see Draft EIR Mitigation Measure 4.1-2, which requires the District to 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 must 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 would not be allowed to commence until the design receives the "pass" rating and approval letter. Furthermore, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. No changes to the Draft EIR are required.

COMMENT O5-9 The comment requests that the EIR, "clearly identify the maximum anticipated operating conditions for the stadium, rather than relying on generalized 'typical' operating conditions."

Comment O5-9 Response: The San Juan Unified School District has been operating since 1960. The District maintains records related to attendance at school events, including ticket counts. The information related to existing and projected attendance at school events at Raider Stadium, presented in Draft EIR Table 3-1, is based on District records and ticket counts both daytime and nighttime sporting events. The methodology and details as to how the District arrived at the data presented in Draft EIR Table 3-1 (page 3-9) are described in detail in Draft EIR Section 3.2.3, "Schedule of Uses," on pages 3-6 through 3-8. In fact, the Draft EIR consistently evaluates both a projected average attendance and a projected maximum attendance scenario, and quantifies the potential impacts therefrom as related to noise, traffic, and parking (see Draft EIR Section 4.3, "Noise and Vibration," and Section 4.4, "Transportation and Circulation"). The commenter has not cited any case, statute, regulation, or other authority that would require the District to place a finite limit on the number of events to be held each year were the project to be completed. All of the topic areas in the Draft EIR evaluate the estimated maximum potential level of attendance shown in Draft EIR Table 3-1 (page 3-9). However, to ensure that attendance would be limited to that peak scenario evaluated in the EIR, refinements to Mitigation Measure 4.4-3c have been identified to implement this limit as a mandatory, enforceable condition; these edits are reflected in Chapter 3, "Errata," to this Final EIR. See also, Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O5-10 Response: Please see Master Responses 7: Operations Management, including Traffic Management and Emergency Evacuation, and Master Response 4: Mitigation.. No changes to the Draft EIR are required.

Comment O5-11 Response: The proposed project is a public school, and as such, it is not subject to residential use standards in the County Zoning Ordinance or the County General Plan. As a public school, the project is also not subject to the American River Parkway Plan, which contains a set of guidelines; the Parkway Plan is not implemented by law. Potential physical environmental impacts from the proposed project on the American River Parkway are evaluated throughout the Draft EIR where appropriate (e.g., aesthetics, biological resources, land use, noise, and recreation), and feasible mitigation measures to reduce the project's short-term construction-related impacts on special-status wildlife (the only

significant impact related to the Parkway identified in the Draft EIR) are included in Draft EIR Section 4.2, "Biological Resources." No changes to the Draft EIR are required. Please see also Master Response 1, Consistency with Applicable Zoning and Other Regulations Governing Land Use.

Comment O5-12 Response: The Draft EIR uses an "accurate" environmental baseline. As stated in Draft EIR Chapter 3, "Project Description," (page 3-1) and in various other topic area sections through the Draft EIR (for example, aesthetics, air quality, biological resources, energy, greenhouse gas emissions, noise, and recreation), the District has been and continues now to use eight mobile 11.7-horsepower diesel-powered light-emitting diode (LED) light towers at the existing Raider Stadium, primarily during the week in winter months when sunset occurs in the afternoon. These are the existing conditions and therefore they represent an accurate environmental baseline. See also Master Response 10: Accurate, Stable, and Finite Project Description.

Comment O5-13 Response: The analyses requested by the commenter regarding the effects of ongoing stadium operations are presented and fully evaluated in the Draft EIR, as specifically noted below:

- Operational effects of nighttime lighting are evaluated in Impact 4.1-1 (pages 4.1-17 and 4.1-18) and Impact 4.1-2 (4.1-18 through 4.1-26).
- Operational noise effects are evaluated in Impact 4.3-1 (pages 4.3-18 through 4.3-27) and Impact 4.3-2 (page 4.3-27).
- Operational impacts on wildlife (including lighting, noise, and people) along with other biological resources are evaluated in Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27).
- Operational impacts related to recreation, including traffic and event impacts on the Parkway, are evaluated in Impact 5.13-2 (pages 5.13-33 and 5.13-34).

No changes to the Draft EIR are required.

Comment O5-14 Response: The cumulative analysis contained in the Draft EIR includes the cell tower that was previously installed at the Rio Americano High School campus. Please see Draft EIR Table 7-1 (page 7-2) which presents the list of projects that were considered in the cumulative analysis; as shown therein on the first row of the table, the cell tower at Rio Americano High School was included in the cumulative analysis. For more on this, please see Master Response 9: Cumulative Analysis. No changes to the Draft EIR are required.

COMMENT O5-15 **The comment states that the EIR "should provide a comprehensive parking and transportation analysis based on the anticipated attendance of 3,500 or more people at stadium events" and states that providing off-site parking locations without demonstrating that adequate, secure parking and transportation arrangements will actually be available is not sufficient.**

Comment O5-15 Response: The detailed analysis requested by the commenter is contained in Draft EIR Appendix E, "Local Transportation Analysis" (Kimley Horn 2026, pages 13 through 16), and is summarized in Draft EIR Section 4, "Traffic and Transportation," (pages 4.4-4 through 4.4-6, and 4.4-12 through 4.4-17). Please see Master Response 6: Parking Availability. Furthermore, Mitigation Measure 4.4-3c has been revised with clarifying edits to outline specific requirements for the Event Management Plan, as shown in Chapter 3, "Errata," of this Final EIR.

Comment O5-16 Response: Draft EIR Chapter 6, "Alternatives," contains an analysis of two alternatives on Draft EIR pages 6-6 through 6-17. Under Alternative 2, "Reconfigure Stadium and Athletic Fields," 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. As stated on Draft EIR page 6-5, to provide a noise and visual buffer for the residents to the north and east, Alternative 2 would provide 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), along the campus property boundary north and east of the new stadium. As further stated on Draft EIR page 6-5, 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. Therefore, Alternative 2 evaluated in Draft EIR Chapter 6, "Alternatives," appears to address the concerns raised by the commenter. Furthermore, the commenter does not provide any other suggested alternatives that he believes the Draft EIR should evaluate. No changes to the Draft EIR are required. Please see also Master Response 8: Alternatives.

Comment O5-17 Response: The analysis contained in the Draft EIR fully addresses the potential physical environmental impacts of the proposed project. No changes to the Draft EIR are required.

COMMENT LETTER O6. SACRAMENTO BIRD ALLIANCE, CLIFF FELDHEIM, PRESIDENT; OCTOBER 15, 2026

Response to Comment Letter O6. Sacramento Bird Alliance

Comment O6-1 Response: The Sacramento Bird Alliance's comment letter has been included in the administrative record for the proposed project. Responses to the comments are provided in responses to comments O6-2 through O6-4.

Comment O6-2 Response: Draft EIR Chapter 3, "Project Description," identifies the proposed increase in bleacher seating capacity from approximately 288 to 2,575 people. Draft EIR Table 3-1 (page 3-9) identifies the anticipated types, frequency, and attendance of stadium events under the proposed project, including additional football games and school events throughout the year. These projected changes in stadium operations are considered in the Draft EIR's environmental impact analysis. Draft EIR Section 4.3, "Noise and Vibration," evaluates increased operational noise associated with expanded stadium activities and concludes that stadium event noise would remain significant and unavoidable after implementation of feasible mitigation. Draft EIR Section 4.2, "Biological Resources" (pages 4.2-18 through 4.2-21), separately evaluates how increased nighttime lighting and operational noise could affect wildlife within the American River Parkway, including nesting and migratory birds. The biological resources analysis considers the timing and frequency of stadium events, including events during migration season, predicted lighting levels within Parkway habitat, and the duration and magnitude of increased noise exposure. Based on these considerations, the Draft EIR concludes that operational lighting and noise impacts on biological resources would be less than significant. No changes to the Draft EIR are required.

Comment O6-3 Response: The proposed stadium improvements would occur within the existing Rio Americano High School campus and would not involve construction within the American River Parkway or removal of Parkway habitat. However, Draft EIR Section 4.2, "Biological Resources," also evaluates potential indirect impacts on Parkway wildlife associated with increased nighttime lighting and event-related noise. As discussed on pages 4.2-18 through 4.2-21, the analysis considers potential disturbance to nesting, foraging, and migratory birds, including the anticipated timing and frequency of additional stadium events. The analysis concludes that operational impacts on biological resources would be less than significant. Draft EIR Section 7.1.3, "Cumulative Impact Analysis" (pages 7-5 and 7-6), further considers the proposed project's contribution to cumulative biological resource impacts, including those associated with urbanization and existing development, and concludes that cumulative impacts would be less than significant. No changes to the Draft EIR are required.

Comment O6-4 Response: Draft EIR Section 4.2, "Biological Resources," evaluates potential construction- and operation-related impacts on wildlife and habitat within the American River Parkway, including impacts on nesting and migratory birds, wildlife movement, and habitat use. The operational analysis in Impacts 4.2-1 and 4.2-4 considers the proposed stadium lighting, anticipated event frequency, and potential increases in noise associated with expanded stadium operations. Draft EIR Section 7.1.3, "Cumulative Impact Analysis" (pages 7-5 and 7-6), evaluates the project's contribution to cumulative impacts on biological resources

in combination with other development and concludes that cumulative biological resource impacts would be less than significant. Draft EIR Section 5.9, "Land Use and Planning," evaluates potential conflicts with applicable land use plans and policies, including the American River Parkway Plan, while Section 5.13, "Recreation," evaluates potential impacts on recreational facilities and use of the Parkway. Stadium activities would occur within the existing school campus, with potential indirect effects on adjacent Parkway resources evaluated in the applicable Draft EIR sections. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

COMMENT LETTER O7. SAVE THE AMERICAN RIVER ASSOCIATION, SARA STEPHENS, OFFICE MANAGER; OCTOBER 16, 2026

Response to Comment Letter O7. Save the American River Association

Comment O7-1 Response: Comment letter O7 has been included in the project's administrative record. Responses to specific comments are provided in responses O7-2 through O7-61.

Comment O7-2 Response: The commenter's opposition to the proposed project is noted. As detailed in responses to O7-4 through O7-61, below, the Draft EIR does not contain deficiencies that require correction, no additional supporting information is needed for informed public review, and appropriate alternatives have been evaluated in the Draft EIR. Corrections to minor typographical errors are shown in Chapter 3, "Errata," of this FEIR.

Comment O7-3 Response: As detailed in responses to O7-4 through O7-61, below, the Draft EIR has described a representative baseline and an appropriate operating program; the Draft EIR has appropriately evaluated the project's potential physical impacts on the environment, including the Parkway; and the Draft EIR includes an evaluation of appropriate alternatives. With regards to compliance with the American River Parkway Plan (ARPP) and other state law, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. Responses to specific issues raised by the commenter are provided in responses O7-2 through O7-61, below.

Comment O7-4 Response: The commenter's information regarding page numbers is noted.

Comment O7-5 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O7-6 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O7-7 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O7-8 Response: Please see Master Response 10: Project Description for a detailed explanation on why the District's previous stadium improvements project that it approved in 2010 but ultimately did not construct is not relevant to the proposed project or this EIR's analyses.

Comment O7-9 Response: The 2022 letter from the District cited by the commenter was intended to notify the surrounding residents of the school's intention to use portable diesel-powered lights at Raider Stadium, which the District continues to use today. The commenter is correct that that letter does not establish year-round lighting, large nighttime spectator events, or operations through 11:30 p.m., nor was it intended to do so; hence, the purpose and need for the proposed project.

Comment O7-10 Response: The information requested by the commenter is already noted by SARA in comment O7-9 and is contained in the attachment to SARA's letter coded as O7-61. Therefore, the Draft EIR baseline, which includes the use of diesel-powered lighting as noted by the commenter, beginning in 2022 and continuing today, is

not "a hypothetical maximum operations" scenario as suggested by the commenter. No changes to the Draft EIR are required.

Comment O7-11 Response: Please see response to comment I47-18. The Draft EIR does not say that the proposed project would improve conditions in the Parkway, as alleged by the commenter. No changes to the Draft EIR are required.

Comment O7-12 Response: The commenter's summary of the proposed project components described in Draft EIR Chapter 3, "Project Description," is noted. The Draft EIR provides a thorough and complete analysis of all of the proposed project components throughout all of the topic areas. No changes to the Draft EIR are required.

Comment O7-13 Response: Please see Master Response 10: Project Description and response to comment I47-18. No changes to the Draft EIR are required.

Comment O7-14 Response: Please see Master Response 10: Project Description and response to comment I47-18. No changes to the Draft EIR are required.

Comment O7-15 Response: Please see Master Response 10: Project Description and response to comment I47-18. No changes to the Draft EIR are required.

Comment O7-16 Response: The Draft EIR is not required to "[Ii]dentify every fixture type, its function, which circuits operate for each activity, and whether the model represents ordinary use or a conservative maximum," as suggested by the commenter. (See *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20, 28 [CEQA only requires a "general description" of a project's technical characteristics, which can mean "involving only the main features of something rather than details or particulars"].) The description of the lighting system contained in Draft EIR Chapter 3, "Project Description," (page 3-6), and Exhibit 3-3 (page 3-5) showing the location of the proposed lighting system, are sufficiently detailed to allow a thorough and accurate analysis throughout all topic areas of the Draft EIR. As further noted on Draft EIR page 3-6, the lighting system has been designed by Musco Lighting, the details of which are presented in Draft EIR Appendix B, Musco Lighting Report. Placing the additional details requested by the commenter from Draft EIR Appendix B into the text of Draft EIR Chapter 3, "Project Description," would not affect the impact analyses or mitigation measures. No changes to the Draft EIR are required.

Comment O7-17 Response: The Draft EIR contains a finite and stable project description. All of the proposed project components and the proposed uses of Raider Stadium are described on Draft EIR pages 3-4 through 3-9; this description encompasses "the whole of the action" as requested by the commenter. The Draft EIR provides a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13), which includes the campus cell tower as requested by the commenter. With regards to the District's Facilities Master Plan: at the present time, the District has no plans to make additional improvements at the Rio Americano High School campus. If and when the District were to decide to make any additional future improvements at Rio Americano High School, the District would prepare the appropriate environmental document as required by CEQA. (See *City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 397-398 ["Mere awareness of proposed expansion plans...does not necessarily require the

inclusion of those proposed projects in the EIR. Rather, those proposed projects must become 'probable future projects'"].) For more on these, please refer to Master Response 9: Cumulative Analysis and Master Response 10: Project Description. No changes to the Draft EIR are required.

Comment O7-18 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-19 Response: As shown in Chapter 3, "Errata," to this FEIR, the typographical error identified by the words "No Impact" at the start of Impact 5.9-2 (Draft EIR page 5.9-29) have been replaced with the words "Less-than-Significant" to match the conclusion on Draft EIR page 5.9-30. The Draft EIR correctly states that the referenced standards apply to buildings, and the proposed project does not include any new buildings. As also correctly stated on Draft EIR page 5.9-30, the County zoning standards do not apply to the Rio Americano High School. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No additional changes to the Draft EIR are required.

Comment O7-20 Response: The georeferenced map requested by the commenter is not required. The Draft EIR provides appropriate exhibits, where necessary, throughout Chapter 3, "Project Description," as well as the individual topic area sections. The American River north bank flood control levee is a flood control levee created by the U.S. Army Corps of Engineers (USACE) and maintained by USACE and the Sacramento Area Flood Control Agency (SAFCA). The levee crown road is a levee maintenance access road that is gated and public vehicular use is not permitted. Although pedestrians and bicyclists are permitted to use the levee crown road, it is not a designated trail and is not part of the designated Parkway trail system as shown in the American River Parkway Plan, SARA Park Area, page 174 (Sacramento County 2008). The only designated trail in the SARA Park Area is the Jedediah Smith Memorial Trail, which is southeast of the levee (American River Parkway Plan, SARA Park Area, page 174) (Sacramento County 2008). Regardless, the Draft EIR analyzes potential impacts to recreationists who may be using the levee crown road and the Jedediah Smith Memorial Trail in Section 4.1, "Aesthetics," Section 4.3, "Noise and Vibration," and Section 5.13, "Recreation."

Comment O7-21 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-22 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-23 Response: The oak grassland restoration policy from the Americano River Parkway Plan referenced by the commenter, which applies to the Parkway not the project site, has no relevance to the proposed project, which consists of improvements to the existing Raider Stadium within the Rio Americano High School Campus. The high school campus is not within the Parkway; see American River Parkway Plan, SARA Park Area, page 174 (Sacramento County 2008). Please see also

Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-24 Response: Please see response to comment O7-23. No changes to the Draft EIR are required.

Comment O7-25 Response: As stated by the commenter, "Policy 10.27 [in the American River Parkway Plan, SARA Park Area] concerns the original SARA Park site on the south bank and prohibits further development there." The project site is not within the Parkway and furthermore is west of the north bank, not the south bank, of the American River. Please see response to comment O7-23 and Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-26 Response: Draft EIR Section 4.2, "Biological Resources," provides a detailed analysis of all of the project's potential environmental impacts on biological resources, including habitat within the Parkway. Please see also response to comment O7-23 and Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-27 Response: The meaning of the commenter's statement that, "[A] recommendation for property-line illumination is not, by itself, evidence of protection for habitat, river views, or night-sky conditions" is unclear. Draft EIR Appendix B contains a thorough light and glare analysis based on the system designed by Musco Lighting for the project site, the results of which are summarized in Draft EIR Section 4.1, "Aesthetics." Draft EIR Section 4.2, "Biological Resources," provides a detailed analysis of all of the project's potential environmental impacts on biological resources, including wildlife within the Parkway that could be affected by the proposed lighting (see Draft EIR pages 4.2-17 through 4.2-19). No changes to the Draft EIR are required.

Comment O7-28 Response: Please see response to Comment O4-60.

Comment O7-29 Response: Please see response to Comment O4-61.

Comment O7-30 Response: The commenter's request is unclear. However, the application of lighting measurements to the evaluation of biological resources is further detailed in Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife.

Comment O7-31 Response: Please see responses to Comments O4-60 and O4-120.

Comment O7-32 Response: Please see response to comment O7-27. No changes to the Draft EIR are required.

Comment O7-33 Response: Please see Master Response 4: Mitigation, with regards to DarkSky "pass" and approval letter.

Comment O7-34 Response: As stated in Draft EIR Project Description (page 3-8), 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. Under these conditions, except in the rare event of overtime, lights would be off by or before 11:00 P.M.

Comment O7-35 Response: The mitigation measures throughout the Draft EIR, including Mitigation Measure 4.1-2 (page 4.126), include appropriate performance standards, and therefore are not deferred. See also Master Response 4: Mitigation. Furthermore, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. No changes to the Draft EIR are required.

Comment O7-36 Response: Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources. The Draft EIR's discussion of operational noise under "Noise" (pages 4.2-20 to 4.2-21) provides a combination of real data obtained from field measurement, as well as modeled sounds attenuation over distance. The measurement of 84 dBA refers to the maximum level of noise (L_{max}) that was obtained at ST-03, south of the project site near the existing levee during daytime hours. The measurement of 78 dBA refers to the attenuated L_{max} estimated using standard point-source attenuation rate of 6 dBA per doubling distance (84 dBA attenuating 6 dBA over 100 feet results in 78 dBA). These numbers provided a conservative comparison of the modeled L_{max} at 100 feet from the edge of the project area between existing, daytime conditions and predicted evening game-time conditions. Additional noise measurements under existing conditions, including evening measurements, measurements across the American River, and measurements during a soccer event, are available in "Existing Noise Environment" (pages 4.3-2 through 4.3-6) in the Draft EIR.

Comment O7-37 Response: As the commentor acknowledges, different receptors can have different conclusions regarding level of significance. The analysis provided in the Draft EIR concluded that the impact of operational noise on biological resources would be less than significant, as discussed under "Operational Noise (Pages 4.2-20 and 4.2-21). Please see Master Response 2 regarding the Draft EIR evaluation of operational noise impacts on biological resources.

Comment O7-38 Response: The bat surveys conducted during one day and four evenings during the summer maternity season were appropriate for evaluating potential impacts from the proposed project. No indications of roosting were found and additional surveys during other seasons would provide no useful information for evaluating potential impacts to roosting bats. The project area primarily contains low quality foraging habitat, the proposed project would cause little change to these low-quality foraging conditions, and bats are expected to continue to favor the adjacent high-quality foraging habitat. Surveys to specifically evaluate foraging at the project site would provide no useful information for evaluating potential impacts to foraging bats.

Comment O7-39 Response: The bat survey memorandum describes the bat habitat assessment that was completed to evaluate habitat with characteristics that may provide suitable roosting habitat, and to look for indications of roosting. No indications of roosting were found. Several small trees were observed within the Parkway that

contained habitat in the form of small woodpecker cavities and sloughing bark that have some potential for providing roosting habitat for a small number of bats. As described in the memo, if these trees do serve as roosting habitat, project activities would not be expected to cause roost abandonment, which is the threshold of impact that was assessed. Therefore, no additional surveys were required to evaluate if this potential roost habitat is actually used for bat roosting. This is consistent with the results of the light and noise studies, which indicate that any small increases of noise or light that might result from project implementation, with or without screening provided by existing trees along the southern project border, would not be expected to cause roost abandonment that may or may not occur within the subject trees. See response to Comment O7-38 above regarding additional surveys to evaluate bat foraging. No changes to the Draft EIR are required.

Comment O7-40 Response: This comment mischaracterizes the analysis provided in the Draft EIR (pages 4.2-24 and 4.2-25). The Draft EIR references mobility as part of a larger discussion of exposure of various life stages of wildlife to potential operational impacts of the proposed project. The Draft EIR analysis addresses potential impacts to wildlife fitness associated with behavioral disruptions (page 4.2-25). See Master Response 2 for additional details regarding the evaluation of operational noise and light impacts of the proposed project on wildlife.

Comment O7-41 Response: The Draft EIR, under Impacts 4.2-1 (pages 4.2-15 through 4.2-24) and 4.2-4 (pages 4.2-24 through 4.2-25) evaluates the project's potential effects to wildlife. This evaluation does not only consider wildlife mortality or removal of vegetation; it also includes behavioral impacts, as well as the timing of impacts relative to various life stages of wildlife (e.g., migration, breeding). Please see Master Response 2 for additional details regarding the Draft EIR evaluation of operational noise and light impacts on wildlife.

Comment O7-42 Response: The Draft EIR evaluates potential impacts of artificial lighting on insect prey and foraging (page 4.2-18 under Impact 4.2-1). Operational impacts would be minor, intermittent, and short-duration, and the project has been designed to minimize glare and skyglow. See Master Response 2 for additional details regarding the Draft EIR evaluation of operational light impacts on wildlife. Minimal change in foraging ability on a small number of days per year would not affect population survivability.

Comment O7-43 Response: The Draft EIR evaluation of operational lighting impacts of the proposed project on wildlife under Impact 4.2-1 (pages 4.2-17 through 4.2-19) and Impact 4.2-4 (page 4.2-24 and 4.2-25) addresses insect attraction and wildlife disorientation. As addressed in the Draft EIR, the proposed project has been designed to minimize skyglow and light trespass, and the Musco Lighting Report and "pass" rating from the International Dark-Sky Association confirm the localized nature of lighting impacts around Raider Stadium. Note that the Draft EIR analysis addresses new stadium events relative to existing conditions. The less-than-significant determination for this impact considers the timing, frequency, duration, habitat quality, and localized nature of operational lighting. Please see Master Response 2 for additional details regarding the Draft EIR evaluation of operational lighting impacts of the proposed project on wildlife.

Please also see response to Comment O2-26 regarding the significance determination for the impact of operational lighting on wildlife movement.

Comment O7-44 Response: Draft EIR Section 4.2, "Aesthetics," provides a thorough analysis of the project's potential to substantially degrade the existing visual character or quality of the project site as required by the State CEQA Guidelines (see Impact 4.2-1, pages 4.1-16 through 4.1-18). The proposed project components are evaluated from appropriate viewpoints, including the Parkway. (Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use.) Draft EIR Section 4.2 appropriately and accurately describes the distances to various features, such as the distance from the project site to the river, the distance between Raider Stadium's southern edge and the Parkway, and the distance between the proposed new light standards and the Jedediah Smith Memorial Trail, which are a necessary part of the impact analysis. These distance references are on different pages of Draft EIR Section 4.1, "Aesthetics," (e.g., 4.1-7, 4.1-8, 4.1-14, 4.1-18, 4.1-19) and they have not been "combined as though they share a surveyed horizontal and vertical reference," as suggested by the commenter. The commenter's attempted mathematical calculations regarding the levee height and sightline distances are irrelevant, since Draft EIR Photo Viewpoint KOP-7 (page 4.1-8) clearly shows that most views of the proposed project components from the Jedediah Smith Memorial Trail are blocked by the tall levee and the even taller row of trees along the school campus' southern property boundary. The analysis of the project components that would be visible from the Parkway above the levee and above the line of trees along the campus southern property boundary (in the context of the project's potential to substantially degrade the existing visual character or quality of the project site) is provided on Draft EIR page 4.1-18. Furthermore, the commenter has not stated any disagreement with the conclusions of Impact 4.1-1 (less than significant) as presented on Draft EIR pages 4.1-17 and 4.1-18. The Draft EIR includes substantial evidence to support the less-than-significant impact conclusion as presented throughout the discussion of Draft EIR Impact 4.1-1 and in the Environmental Setting information presented on Draft EIR pages 4.1-1 through 4.1-11. CEQA does not require a lead agency to conduct additional environmental review or gather new data if the process would amount to a "meaningless paper-pushing exercise." The purpose of CEQA is to disclose the potential physical environmental impacts of a project so that lead agencies can make decisions with environmental consequences in mind, not generating paper as a process for process's sake (State CEQA Guidelines Section 15003[g]). Furthermore, CEQA requires that decisions be informed and balanced. It must not be subverted into an instrument for the oppression and delay of social, economic, or recreational development or advancement (State CEQA Guidelines Section 15003[j]). No further analysis or visual simulations are required.

Comment O7-45 Response: As shown in FEIR Chapter 3, "Errata" the typographical error noted by the commenter in the last paragraph on page 6-7 has been corrected to state that under Alternative 2, the sports lighting would be located *further* from American River Parkway and relatively *less* visible from this public viewing location compared to the visibility of lighting under the proposed project.

Comment O7-46 Response: The commenter asks that an analysis of nighttime light intrusion into the Parkway related to recreation be prepared even though no recreationists would be present to perceive it because the Parkway is closed after dark, with very limited exceptions, such as pedestrians or cyclists who are commuting home. (Sac. County

Code, section 9.36.067.) This requested analysis would not change the Draft EIR's conclusions that aesthetic impacts from the project's lighting would be less than significant with mitigation. That there might be a few occasional Parkway users after dark who are commuting home does not require a separate or new analysis, as there likely would be so few after-dark users that they would not be affected. The commenter does not present substantial evidence indicating that, absent this analysis, the project would have significant and unmitigated impacts. (See *Laurel Heights Improvement Association v. Regents of Univ. Of Cal.* (1988) 47 Cal.3d 376, 415 [commenters "can always imagine some additional study," but even if such a study "might be helpful [it] does not make it necessary"].) To this end, CEQA requires an analysis of impacts to the physical environment, not to individual users or persons. (*National Parks and Conservation Association v. County of Riverside* (1999) 71 Cal.App.4th 1341, 1359–1361.) Furthermore, visual simulations showing the proposed nighttime lighting from the Parkway at dusk and after dark are provided on Draft EIR pages 4.1-21 and 4.1-22. The project's potential nighttime lighting impacts on wildlife are thoroughly evaluated in Draft EIR Impact 4.2-1 on pages 4.2-17 through 4.2-19. As outlined in Master Response 10, the suggested analyses requested by the commenter—illegal gathering near the levee or trail after dark, "informal viewing areas" (which the commenter has not defined), increased litter in the Parkway, restroom demand from Parkway use, and off-trail movement as related to Parkway use—are not physical impacts on the environment from the proposed project. (See *Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 578–579 [CEQA does not require an analysis of subjective social impacts].) The project site is situated on the Rio Americano High School campus and attendees at sports events are expected to stay on the high school campus, which is fenced; trespassing on the Parkway after dark (along with any associated litter or demand for new Parkway restrooms from illegal use) would be a matter for County law enforcement. (See *City of Hayward v. Trustees of Cal. State Univ.* (2015) 242 Cal.App.4th 833, 843.)

Comment O7-47 Response: Please see Master Response 9: Cumulative Impacts for a discussion on why the Draft EIR did not need to analyze the U.S. Army Corps of Engineers Project as part of its cumulative impacts analysis. Please also see Response to Comment I82-23.

Comment O7-48 Response: Please see response to comment O7-17.

Comment O7-49 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As to the commenter's contention that the EIR and District should consider whether the Project will rise to a "public nuisance," as defined by Civil Code sections 3479 and 3480, CEQA requires no such analysis, nor does the commenter point to any obligation to do so. To this end, the commenter does not present substantial evidence that establishes the Project and its elements will cause and create a substantial adverse burden to property.

Nevertheless, Civil Code section 3479 provides that a "nuisance" includes "[a]nything which is injurious to health, including, but not limited to, the illegal sale of controlled substances, or is indecent or offensive to the senses, or an obstruction to the free use of property, so as to interfere with the comfortable enjoyment of life or property, or unlawfully obstructs the free passage or use, in the customary manner, of any navigable lake, or

river, bay, stream, canal, or basin, or any public park, square, street, or highway, is a nuisance." (Civ. Code, § 3479.) Section 3480 defines a "public nuisance" as "one which affects at the same time an entire community or neighborhood, or any considerable number of persons, although the extent of annoyance or damage inflicted upon individuals may be unequal." (Civ. Code, § 3480.) Critically, however, the following provision—Section 3481—provides that "[n]othing which is done or maintained under the express authority of a statute can be deemed a nuisance." (Civ. Code, § 3482.) As explained in Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, and Master Response 10: Accurate, Stable, and Finite Project Description, the District, as an agency of the State, is statutorily authorized and required to develop certain infrastructure for its educational facilities. (See Edu. Code, § 38131 [each and every public school facility must have a civic center]; Gov. Code, § 53094 [school districts may exempt themselves from local zoning ordinances to construct educational facilities].) Notwithstanding the District's invocation of the zoning exemption provided by Government Code, section 53094, the Project likewise conforms with the site's underlying RD-4 zoning designation, which permits educational uses by right. As explained in Master Response 1, the Project's proposed facility improvements directly serve an educational purpose that are fundamental to the school's programming. Furthermore, by preparing this EIR and evaluating the Project's potential impacts, the District is also fulfilling its statutory obligations under CEQA. The EIR analyzes and mitigates for any potential impacts the commenter expresses concerns about—i.e., the Parkway's recreational uses, biological resources, aesthetics from lighting, and noise. The EIR also explains that the Project will be developed entirely within and not extend beyond the RAHS campus footprint. By virtue of this, and absent substantial evidence to the contrary, Project construction and operation will not impair recreational access to or passage through the Parkway. Nor will it substantially or adversely burden the public's ability to use parkland or river-dependent resources. The commenter otherwise does not explain how or why the Project will "unreasonably" impair a "considerable number of persons' enjoyment" of the off-site Parkway or "neighboring public resources," therefore no further response is required and no further edits to the Draft EIR are necessary.

Nevertheless, substantial evidence establishes that no such significant impacts will occur to resources overseen or managed by CDFW. The Draft EIR explains that, with implementation of Mitigation Measures 4.2-1a through 4.2-1e, the Project will have less-than-significant impacts to species identified as a candidate, sensitive, or special-statutes species in CDFW plans, policies, or regulations. (Draft EIR, pp. 1-5 to 1-8, 4.2-15 to 4.2-24.) Among other requirements, these measures include coordination and consultation with appropriate CDFW staff. The Draft EIR also finds that the Project will have no impact to riparian habitats or other sensitive natural communities identified in CDFW plans and regulations because Project construction and operational activities will occur entirely within the RAHS campus footprint, and there are no riparian or sensitive natural habitats within 100 feet of the Project Site. (Draft EIR, pp. 1-8, 4.2-24.) As also noted in Response to Comment O9-21, the Project Team met with CDFW staff on March 25, 2026, to evaluate the Project's potential impacts to biological resources, and the team incorporated CDFW's input and feedback into the Draft EIR's analysis. Notably, CDFW did not submit comments on this Draft EIR expressing concerns about potential unmitigated impacts or adverse effects to public trust resources. Thus, taken together, substantial evidence supports the Draft EIR's conclusion that the Project will not have significant

unmitigated impacts to biological resources protected by applicable CDFW regulations, nor will it interfere with CDFW's role in overseeing and administering public trust resources.

Comment O7-50 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment O7-51 Response: An alternative that would reduce the project's noise impacts, as requested by the commenter, is fully evaluated in Draft EIR Chapter 6, "Alternatives": this is Alternative 2: Reconfigure Stadium and Athletic Fields, described on Draft EIR page 6-5. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment O7-52 Response: The commenter states that the project objectives are "meaningless" because the District has not demonstrated that the proposed school improvements are necessitated by existing "hardship." The commenter nevertheless correctly concedes that CEQA does not require proof of hardship before a school improves its facilities, . The comment concludes by stating that the Draft EIR's alternatives analysis is deficient because there is no "distinct intermediate alternative combining targeted Rio improvements with continued off-campus use for major events." As explained in the Draft EIR and outlined in Master Response 8: Alternatives, the potential for a reduced operations alternative was considered but ultimately rejected by the District because it would not achieve any of the project objectives. Draft EIR Chapter 3, "Project Description," and elsewhere throughout the document, the Draft EIR explains how the District is already using portable diesel-powered lights, which help with some availability for nighttime practices, but do not provide sufficient lighting for all of the school's nighttime sports events; the only way to achieve that utility is to install high-mast stadium lighting. CEQA does not restrict an agency's discretion to identify and pursue a particular project designed to meet a particular set of objectives. (*California Oak Foundation v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 276–277; *In re Bay-Delta Programmatic Envtl. Impact Report Coordinated Proceedings* (2008) 43 Cal.4th 1143, 1166 [alternatives analysis may be structured "around a reasonable definition of underlying purpose and need not study alternatives that cannot achieve that basic goal"]; *Save San Francisco Bay Assn. v. San Francisco Bay Conservation and Development Com.* (1992) 10 Cal.App.4th 908, 929 [lead agency may limit alternatives to those "which could feasibly accomplish the project's purpose"].) Draft EIR Chapter 6, "Alternatives," contains a meaningful comparison of potentially feasible ways to achieve most of the project's objectives while reducing significant effects, as requested by the commenter. Please see also Master Response 8: Alternatives and response to comment O7-51.

Comment O7-53 Response: Please see response to comment I47-18, and Master Response X: finite and stable project description. As suggested by the commenter, the District will weigh the benefits of the proposed project against the potential environmental impacts identified in the EIR as part of its decision whether or not to certify the EIR and adopt either the proposed project or one of the alternatives (including the No Project Alternative). No changes to the Draft EIR are required.

Comment O7-54 Response: Please see responses to comment O7-51 through O7-53, and Master Response 8: Alternatives. For the reasons explained therein, another alternative as suggested by the commenter is not required. With regard to the commenter's request to establish enforceable limits on attendance, amplification, lighting circuits, hours, frequency, and seasonal use, please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment O7-55 Response: Please see responses to comment O7-51 through O7-53, and Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment O7-56 Response: The commenter's request that asks the Draft EIR to "…distinguish the statement that No Project meets none of the enhancement objectives from the different proposition that existing facilities provide no underlying educational or athletic service" is unclear. As described in Chapter 3, "Project Description," and noted throughout the Draft EIR, the District is already using portable diesel-powered lights, which help with some availability for nighttime practices, but do not provide sufficient lighting for all of the school's nighttime sports events; the only way to achieve that utility is to install high-mast stadium lighting t Alternative 1: No Project Alternative, would include continued use of the existing portable diesel-powered lights, and would also include continued use of the El Camino High School Stadium for nighttime sports events such as football games (Draft EIR page 6-5). With regards to the commenter's request to distinguish the alternative other than Alternative 1: No Project that would be environmentally superior, the Draft EIR does so by analyzing Alternative 2. Nevertheless, as shown in Chapter 3, "Errata," of this FEIR, the text requested by the commenter has been added to Draft EIR page 6-17. This change does not affect the analyses or conclusions contained in the Draft EIR. Please also see Master Response 8: Alternatives.

Comment O7-57 Response: An EIR is not required to consider economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. CEQA Guidelines, section 15064, subdivision (e) states: "Economic and social changes resulting from a project shall not be treated as significant effects." (CEQA Guidelines Section 15064[e]). "Where a physical change is caused by economic or social effects of a project, the physical change *may* be regarded as a significant effect in the same manner as any other physical change resulting from the project" (CEQA Guidelines Section 15064[e]) (emphasis added). However, the physical changes from the proposed project are not caused by economic and social effects in any way. Furthermore, economic considerations, such as those raised by the commenter, do not constitute substantial evidence of a potentially significant environmental impact resulting from a physical change (Public Resources Code Sections 21080[e][2] and 21082.2[c]; CEQA Guidelines Sections 15384[a], 15382; *Goleta Union School Dist. v. Regents of Univ. Of Cal.* (1995) 37 Cal.App.4th 1025, 1031). Therefore, no changes to the Draft EIR are required.

Comment O7-58 Response: For the reasons explained in responses to comments O7-1 through O7-57, the changes to the Draft EIR that are requested in comment O7-58 are not required.

Comment O7-59 Response: Written responses to the issues raised by the commenter are contained in responses O7-1 through O7-61.

Comment O7-58 Response: For the reasons explained in responses to comments O7-1 through O7-57, the changes to the commenter that are requested in comment O7-58 are not required.

Comment O7-59 Response: Written responses to the issues raised by the commenter are contained in responses O7-1 through O7-61. There is no new significant information, new significant effects, a substantial increase in an effect, or a substantially different feasible alternative or mitigation measure that would clearly lessen significant effects but is declined, and therefore recirculation of the Draft EIR is not required. If the District decides to the certify the EIR and adopt either the proposed project or one of the alternatives, a Mitigation Monitoring and Reporting Program will also be adopted, along with a Findings of Fact and Statement of Overriding Considerations, as required by CEQA. No changes to the Draft EIR are required.

Comment O7-60 Response: SARA's comment letter dated October 16, 2026 and its attachments have been included in the project's administrative record. The SARA letter referenced by the commenter from 2010 and attached to the SARA 2026 comment letter is noted and is incorporated herein; however, because the 2010 letter does not relate to the proposed project, no responses to the comments raised in that attachment are necessary. Please see also response to comment O7-8. Public notice of the FEIR availability, and any public hearing related to EIR certification and project approval, will be provided on the District's website.

Comment O7-61 Response: SARA's opposition to the proposed project is noted.

COMMENT LETTER O8. SIERRA CLUB MOTHER LODE CHAPTER, SACRAMENTO GROUP, BREMNDA GUSTIN, PH.D.; OCTOBER 16, 2026

Response to Comment Letter O8. Sierra Club Mother Lode Chapter, Sacramento Group

Comment O8-1 Response: The Sierra Club's comment letter has been received and included in the administrative record. Responses to the substantive comments are provided in Responses to Comments O8-2 through O8-34.

Comment O8-2 Response: The comment expresses opposition to the proposed project based on its proximity to the American River Parkway and concerns regarding environmental impacts, including noise. The Draft EIR evaluates potential impacts on the Parkway and surrounding environment in Sections 4.1, "Aesthetics," 4.2, "Biological Resources," 4.3, "Noise and Vibration," and 5.13, "Recreation." As acknowledged in Section 4.3, construction and operational stadium event noise impacts would remain significant and unavoidable after implementation of feasible mitigation. Please see the responses to the specific environmental issues raised in the Comments O8-3 through O8-29.

Comment O8-3 Response: The Draft EIR evaluates the proposed project's potential environmental impacts in Chapters 4 and 5, including impacts associated with nighttime lighting, biological resources, noise, transportation, and recreation. Chapter 6 evaluates project alternatives, and Chapter 7 addresses cumulative impacts. The specific concerns regarding the adequacy of these analyses and proposed mitigation measures are addressed in Responses to Comments O8-4 through O8-29.

Comment O8-4 Response: Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 4.3, "Noise and Vibration," evaluate the potential effects of the proposed stadium improvements beyond the campus boundary, including effects on the adjacent American River Parkway. The analysis does not assume that lighting and noise would be confined to the stadium. Draft EIR Section 4.1 (pages 4.1-18 through 4.1-26) evaluates light trespass, glare, skyglow, and visibility of the proposed improvements from surrounding viewpoints. Draft EIR Section 4.2 (pages 4.2-18 through 4.2-21) evaluates nighttime lighting and operational noise effects on nearby wildlife habitat, including estimated event noise levels within the Parkway. In particular, the biological resources analysis estimates that football game noise could range from approximately 59 to 72 dBA Leq at 100 feet from the source, compared with an existing measured daytime ambient level of approximately 55 dBA Leq along the nearby trail. The Draft EIR considers the anticipated magnitude, frequency, and duration of these effects in reaching its biological resources conclusions. Separately, Section 4.3 identifies significant and unavoidable construction and operational noise impacts on surrounding sensitive receptors. Exhibit 4.3-2 depicts the locations of existing game noise measurements; it does not establish a limit on the distance that stadium noise or light could travel. Please also see Master Response 2 regarding impacts on biological resources.

Comment O8-5 Response: The Sierra Club's interest in protecting the American River Parkway and its natural, scenic, and recreational resources is noted. The comment does not

identify a specific deficiency in the Draft EIR's environmental analysis. No changes to the Draft EIR are required.

Comment O8-6 Response: The American River Parkway Plan and its policies regarding adjacent development are discussed in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 5.9, "Land Use and Planning." These analyses consider potential project effects on Parkway scenic resources, wildlife, habitat, and recreational use. Section 4.1 evaluates the visibility of the proposed lighting and other improvements from Parkway viewpoints, while Section 4.2 evaluates potential indirect effects of operational lighting and noise on wildlife and habitat. Draft EIR Section 5.9 (pages 5.9-29 and 5.9-30) evaluates potential environmental impacts resulting from conflicts with applicable land use plans and policies, including the American River Parkway Plan and Parkway Corridor Combining Zone. The relationship between the proposed project and Parkway Plan Policies 7.19 through 7.19.2 and 7.23 through 7.24 is further discussed in Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use.

Comment O8-7 Response: Draft EIR Section 5.9, "Land Use and Planning" (pages 5.9-29 and 5.9-30), evaluates the proposed project's consistency with applicable land use plans and policies, including the American River Parkway Plan and Parkway Corridor Combining Zone. The analysis acknowledges the Urban American River Parkway Preservation Act and considers the applicable Parkway Corridor Combining Zone provisions in evaluating potential environmental impacts associated with land use conflicts. Draft EIR Sections 4.1, "Aesthetics," and 4.2, "Biological Resources," also evaluate potential effects on the scenic and biological resources of the Parkway. Regarding the specific statutory provisions identified by the commenter, please also see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, which discusses Public Resources Code Section 5842, Government Code Section 53094, and the District's authority concerning local zoning and Parkway Plan consistency.

Comment O8-8 Response: Draft EIR Section 3.4, "Project Objectives," identifies the objectives of the proposed stadium improvements, including enhancing Rio Americano High School as a Center of Community, improving facilities for athletic and non-athletic events, and increasing flexibility in scheduling campus activities. Draft EIR Chapter 3 describes the proposed increase in bleacher seating from approximately 288 to 2,575 people, installation of four 80-foot-tall stadium light standards, and other improvements. Table 3-1 (page 3-9) identifies anticipated event frequency and attendance, including high-attendance football games and graduation. The potential environmental effects associated with these changes in stadium operations are evaluated in Chapters 4 and 5, including impacts on the adjacent American River Parkway and surrounding residential neighborhoods. Draft EIR Chapter 6 evaluates alternatives to the proposed project, including their relative environmental effects and ability to achieve the project objectives. Please also see Master Response 8: Alternatives.

Comment O8-9 Response: Draft EIR Section 4.3, "Noise and Vibration," identifies construction-related noise and operational stadium event noise as significant and unavoidable impacts after implementation of feasible mitigation. Mitigation Measure 4.3-1a

establishes measures to reduce construction noise, including restrictions on construction hours, equipment controls, and notification of nearby residents. Mitigation Measure 4.3-1b establishes operational noise controls addressing the public address system, event scheduling, artificial noisemakers, and bleacher-related noise. Although these measures would reduce noise exposure, the Draft EIR acknowledges that certain construction activities and event-related sound sources cannot be sufficiently controlled to reduce all noise impacts to less-than-significant levels. Draft EIR Chapter 6, "Alternatives," evaluates the No Project Alternative and Alternative 2: Reconfigure Stadium and Athletic Fields, including their relative environmental effects. Please also see Master Responses 4 and 8 regarding noise impacts and alternatives.

Comment O8-10 Response: The Draft EIR identifies significant and unavoidable construction and operational noise impacts after implementation of feasible mitigation. Under CEQA, if the District elects to approve a project with significant and unavoidable environmental impacts, it must make the required findings under CEQA Guidelines Section 15091 and, where applicable, adopt a Statement of Overriding Considerations under Section 15093. Such findings and considerations are part of the District's project approval process and do not themselves reduce the identified impacts to a less-than-significant level or replace applicable legal requirements. The comment is noted.

Comment O8-11 Response: Draft EIR Section 6.4.1, "No Project Alternative," evaluates the continuation of existing stadium operations, including continued use of El Camino High School Stadium for nighttime football games. Under this alternative, the proposed stadium improvements would not be constructed, and existing athletic activities would continue, including use of portable lighting for certain evening events. The Draft EIR identifies the No Project Alternative as environmentally superior because it would avoid construction of the proposed improvements and reduce impacts in several environmental resource areas. However, the Draft EIR also explains that continued use of El Camino High School would not achieve the project objectives related to hosting additional athletic and non-athletic events on the Rio Americano campus and increasing scheduling flexibility. Draft EIR Section 6.3.3 discusses the use of existing alternative stadiums, including additional travel associated with off-campus events and the District's limited control over scheduling at those facilities. Please also see Master Response 8: Alternatives.

Comment O8-12 Response: Draft EIR Chapter 6, "Alternatives," evaluates alternatives to the proposed project in accordance with the selection criteria identified in Section 6.2.1 (page 6-2), including the ability to achieve most of the basic project objectives, feasibility, and the potential to avoid or substantially reduce significant environmental impacts. The alternatives analysis addresses several of the approaches identified by the commenter. Specifically, Draft EIR Section 6.3.2 (page 6-4) considers rescheduling athletic practices and games to morning hours, which would eliminate the need for permanent nighttime stadium lighting. This alternative was not carried forward for detailed evaluation because winter sunrise times and the school and work schedules of participants and attendees would limit opportunities to accommodate practices and weekday competitions. Draft EIR Section 6.3.3 (page 6-4) also considers the use of existing off-site stadiums and explains that continued use of such facilities would be similar to existing

conditions, as evaluated under the No Project Alternative, and would present additional travel and scheduling constraints.

Draft EIR Section 6.4.1 (pages 6-4 and 6-5) evaluates the No Project Alternative in detail. Under this alternative, the existing stadium would continue operating without expanded bleacher seating, permanent stadium lighting, an upgraded public address system, or a new press box. Existing portable lighting would continue to be used for certain evening activities, and Rio Americano High School would continue hosting nighttime football games at El Camino High School Stadium. As discussed in Section 6.5, the No Project Alternative would reduce environmental impacts in several resource areas compared with the proposed project but would not achieve the identified project objectives related to expanded on-campus activities and scheduling flexibility.

The Draft EIR also evaluates Alternative 2: Reconfigure Stadium and Athletic Fields, which would relocate the stadium farther from the American River Parkway while retaining the proposed improvements. These alternatives provide a comparison of the environmental effects of maintaining existing operations, relocating the proposed improvements, and implementing the proposed project. Please also see Master Response 8: Alternatives for further discussion of the alternatives considered and the District's rationale for their selection.

Comment O8-13 Response: The Draft EIR identifies specific measures, implementation requirements, and performance standards intended to reduce potentially significant environmental impacts. For example, Mitigation Measure 4.1-2 requires the District to submit the proposed stadium lighting design to the International Dark-Sky Association for review and obtain a “pass” rating and approval letter before construction may begin. If the design does not meet the program requirements, it must be revised and resubmitted until approval is obtained. Mitigation Measure 4.3-1b establishes requirements for the design and operation of the public address system, including pre-operation sound testing, a maximum public address system noise level of 70 dBA Lmax at the nearest residential property line, documented volume settings, and restrictions on amplified activities after 10:00 p.m. The Draft EIR acknowledges that these measures would reduce operational noise but would not eliminate the significant and unavoidable impact.

Similarly, Mitigation Measures 4.4-3a through 4.4-3c establish requirements for managing event-related parking, pedestrian safety, and vehicle circulation. Mitigation Measure 4.4-3b requires the District to prepare an Event Transportation Management Plan through a qualified transportation professional before the first event anticipated to require off-site parking and implement the plan during applicable events. The mitigation measure specifies the matters the plan must address, including anticipated attendance and parking demand, designated parking locations, pedestrian routes, roadway crossing treatments, event staffing, and circulation procedures. It also requires the District to evaluate the plan's effectiveness following the first highly attended nighttime event and revise it as necessary to address identified safety and circulation conditions. Although certain implementation details would be finalized before operation, the Draft EIR establishes the required measures, timing, and procedures rather than leaving the identification of transportation mitigation entirely to future planning.

Please also see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O8-14 Response: Draft EIR Section 4.3, "Noise and Vibration" (pages 4.3-22 through 4.3-27), evaluates combined stadium event noise, including crowd, band, bleacher, and public address system activity, using reference measurements from El Camino High School. Estimated noise levels at the nearest residences range from 48 to 61 dBA Leq and 62 to 76 dBA Lmax. Draft EIR Section 4.2, "Biological Resources" (page 4.2-20), separately estimates event noise levels near Parkway habitat at 59 to 72 dBA Leq and 73 to 87 dBA Lmax.

Mitigation Measure 4.3-1b establishes public address system controls, a 70 dBA Lmax residential property-line limit for the public address system, and restrictions on amplified sound and other event noise sources. The Draft EIR does not quantify the reduction attributable to each individual measure or establish a separate Parkway noise limit, it acknowledges that these measures would not fully control combined event noise. Accordingly, operational stadium noise impacts would remain significant and unavoidable. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-15 Response: Draft EIR Section 4.3, "Noise and Vibration" (pages 4.3-14 through 4.3-16), explains that although the District considers itself exempt from local noise regulations, the analysis uses Sacramento County noise standards to evaluate potential environmental impacts under CEQA. The Draft EIR also identifies Sacramento County Code Section 6.68.090, which specifically exempts school bands, school athletic events, and school entertainment events from the County Noise Ordinance.

Draft EIR Section 3.2.3 and Table 3-1 identify the anticipated stadium uses, including athletic competitions, graduation, school assemblies, and school-sanctioned community events. The Draft EIR does not separately identify private rental events or determine whether such events would qualify for the ordinance's school-event exemption. Regardless of the claimed exemption, Section 4.3 evaluates noise associated with the anticipated stadium activities and concludes that operational noise impacts would remain significant and unavoidable after mitigation. Please also see Response to Comment O8-14.

Comment O8-16 Response: Mitigation Measure 4.3-1b, presented in Draft EIR Section 4.3, "Noise and Vibration," requires the public address system to undergo sound testing and property-line measurements before its use for evening events. The measure requires the system to be adjusted, with additional controls installed if necessary, to meet a maximum level of 70 dBA Lmax at the nearest residential property line. Approved public address system settings must be documented and maintained, and event staff are prohibited from increasing the volume beyond those settings. The measure also prohibits certain artificial noisemakers and restricts amplified activities after 10:00 p.m. These requirements address specific controllable sources of stadium noise. However, because other event noise sources cannot be fully controlled, the Draft EIR concludes that operational stadium event noise would remain significant and unavoidable. The comment additionally requests ongoing event monitoring, public reporting, corrective-

action procedures, and further operational restrictions. The pre-use public address system testing required by Mitigation Measure 4.3-1b does not constitute an ongoing monitoring program for combined stadium event noise.

Comment O8-17 Response: Draft EIR Section 4.1, "Aesthetics," evaluates potential light trespass, glare, and skyglow associated with the proposed stadium lighting using project-specific modeling prepared by Musco Lighting and included in Draft EIR Appendix B. Mitigation Measure 4.1-2 requires the lighting design to obtain a "pass" rating from the International Dark-Sky Association before construction. Furthermore, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. The Draft EIR's biological resources evaluation is not limited to DarkSky design approval. Draft EIR Section 4.2 (pages 4.2-17 through 4.2-21) separately evaluates potential operational lighting impacts on wildlife, including nesting and migratory birds and bats, with consideration of the proposed lighting design, anticipated event timing and duration, and potential habitat disturbance. The Draft EIR concludes that operational lighting impacts on biological resources would be less than significant based on the project-specific conditions and exposure considered in the analysis. Please also see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-18 Response: Draft EIR Section 4.2, "Biological Resources" (pages 4.2-17 through 4.2-19), identifies the proposed stadium lighting as 5,700 Kelvin LED fixtures and evaluates potential ecological effects of artificial nighttime lighting, including changes in wildlife foraging, nesting, roosting, and migration. The analysis considers the proposed lighting design, modeled light trespass, and anticipated frequency and duration of nighttime activities in concluding that operational lighting impacts on biological resources would be less than significant. Kelvin (K) measures the color temperature of light. Lower Kelvin lights (approximately 1,800 K–3,000 K) produce warmer, yellowish light, while higher Kelvin lights (approximately 4000 K–5000+ K) emit a cooler, bluer light. Many taxonomic groups are sensitive to light in the blue and into the ultraviolet, and these wavelengths can disrupt biological rhythms (i.e., suppress melatonin production, alter circadian rhythms, and can trigger daytime behaviors at night), and attract or disorient animals (Longcore et.al. 2023). Although manufacturing specifications for the current mobile light towers do not identify the Kelvin, such portable lights are typically design to produce 'daytime-like' lighting conditions in the cooler white-light spectrum, such as around 5,000 K. While the proposed lighting may be similar to or slightly higher, the proposed lighting design accounts for several other important minimization techniques that are recommended by Longcore et.al. (2023) including dimming, shielding and directionality, and restricting use of lighting to a portion of the night (i.e., during use). Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-19 Response: Draft EIR Section 4.1, "Aesthetics" (pages 4.1-18 through 4.1-26), and Appendix B evaluate the proposed lighting design, including measures to minimize light trespass, glare, and skyglow through directional fixtures, shielding, and adjustable illumination. Mitigation Measure 4.1-2 requires the District to obtain an International Dark-Sky Association "pass" rating and approval letter before construction, with revisions and resubmittal required if the

design does not meet the applicable standards. Draft EIR Section 3.2.3 describes anticipated lighting hours, while Mitigation Measure 4.3-1b establishes scheduling and amplified-sound restrictions for evening events. The Draft EIR requires design approval before installation but does not separately establish post-installation lighting measurements. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources and Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors.

Comment O8-20 Response: The American River Parkway's nighttime closure is considered in Draft EIR Section 5.13, "Recreation," in evaluating potential effects on recreational users. However, the Draft EIR's biological resources analysis does not rely on the absence of nighttime recreational activity to evaluate potential effects on wildlife. Draft EIR Section 4.2 (pages 4.2-17 through 4.2-21) considers nighttime lighting and noise impacts on nearby wildlife, including bats and migratory birds. Separately, Draft EIR Section 4.1 evaluates the visibility of the proposed light standards and other improvements from surrounding public viewpoints. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources and Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors.

Comment O8-21 Response: Draft EIR Section 3.2.3, "Schedule of Uses" (pages 3-6 through 3-9), and Table 3-1 identify the anticipated types, frequency, attendance, and operating hours of stadium activities, including high-attendance events. The Draft EIR states that football games would generally conclude by 10:00 p.m., but could extend until 11:00 p.m., with reduced lighting potentially remaining on for approximately 30 minutes afterward for safe exiting and cleanup. Mitigation Measure 4.3-1b requires evening events to be scheduled to conclude by 10:00 p.m., while recognizing that certain events may extend beyond that time because of overtime or other circumstances outside the District's control. In such cases, amplified music, band activity, and non-emergency public address use must cease after 10:00 p.m. The event frequencies and attendance levels in Table 3-1 represent anticipated operations rather than express operational caps. The Draft EIR also establishes event-specific transportation management requirements under Mitigation Measures 4.4-3a through 4.4-3c. Please also see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O8-22 Response: Draft EIR Section 3.2.3, "Schedule of Uses" (pages 3-6 through 3-9), and Table 3-1 describe anticipated stadium activities, including five to eight annual home football games and other athletic and school-related events. The environmental analysis considers high-intensity operating conditions rather than relying solely on historical averages. Specifically, Section 4.3 evaluates operational noise using reference measurements from a high-attendance football game, while Section 4.1 and Appendix B evaluate the proposed stadium lighting under maximum modeled illumination conditions.

Draft EIR Section 4.2, "Biological Resources" (pages 4.2-17 through 4.2-25), evaluates potential effects of operational lighting and noise on Parkway habitat and wildlife, including foraging, nesting, roosting, and migration. Under Impact 4.2-4, the Draft EIR also evaluates potential effects on wildlife corridor function,

considering the lighting design, intermittent event noise, and absence of new physical barriers within the Parkway. Based on these factors, the Draft EIR concludes that impacts on biological resources and wildlife movement would be less than significant. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-23 Response: Draft EIR Section 3.2.2, “Operations Plan,” describes the District's proposed Night Event Management Standards and existing school operating procedures. The Draft EIR also identifies specific mitigation requirements governing stadium operations. Mitigation Measure 4.3-1b establishes enforceable public address system performance standards, restrictions on artificial noisemakers, and limits on amplified activities after 10:00 p.m. Mitigation Measure 4.4-3b requires an Event Transportation Management Plan to be prepared by a qualified transportation professional before the first event anticipated to require off-site parking and implemented during applicable events. The plan must address anticipated attendance, parking demand, designated parking locations, pedestrian routes, staffing, and circulation procedures. It also requires evaluation of the plan's effectiveness following the first highly attended nighttime event and revisions as necessary. These measures establish specific operational responsibilities and implementation requirements beyond the general Night Event Management Standards. Please also see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O8-24 Response: Draft EIR Section 5.9, “Land Use and Planning” (pages 5.9-29 through 5.9-30), evaluates consistency with the American River Parkway Plan (ARPP) and applicable Parkway Corridor Combining Zone (PCCZ) provisions, including standards intended to minimize visual intrusion and protect Parkway resources. Draft EIR Sections 4.1, “Aesthetics,” and 4.2, “Biological Resources,” further evaluate consistency with ARPP policies addressing scenic quality, wildlife habitat, and wildlife corridors. The analysis considers the existing developed campus, intervening levee and vegetation, proposed lighting design, and absence of direct disturbance to Parkway habitat. Mitigation Measure 4.1-2 requires lighting design approval before construction. Based on these considerations, the Draft EIR concludes that the proposed project would not conflict with applicable Parkway-related policies. Please also see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-25 Response: Draft EIR Sections 4.1, “Aesthetics,” 4.2, “Biological Resources,” and 4.3, “Noise and Vibration,” describe existing environmental conditions at and near Rio Americano High School, including the adjacent American River Parkway. The analysis incorporates existing stadium operations, ambient noise measurements, biological resource surveys, and existing nighttime lighting conditions. Section 4.3 includes measurements collected during evening soccer games at Rio Americano High School in February 2026, as well as reference football game measurements from El Camino High School to evaluate potential noise from larger events that are not currently hosted at Raider Stadium. Draft EIR Chapter 3 and Table 3-1 identify anticipated changes in stadium use, including attendance, event frequency, and operating hours. Please also see

Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-26 Response: Draft EIR Section 4.2, “Biological Resources” (page 4.2-9), describes the July 2025 bat roost habitat assessment and four subsequent dusk emergence surveys conducted in July and August 2025. Although no bats were observed emerging from the surveyed trees, bats were observed foraging near the playing field, and the Draft EIR recognizes the vicinity as bat foraging habitat. The absence of observed emergence during the surveys does not establish that suitable habitat could not be used during other seasons. The operational analysis on pages 4.2-18 through 4.2-21 considers potential disturbance from nighttime lighting and noise, including effects during sensitive periods such as the maternity season and winter months. The Draft EIR's less-than-significant conclusion considers the lighting design, predicted exposure, anticipated duration of stadium activities, and surrounding habitat conditions, rather than relying solely on the summer survey results. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-27 Response: Draft EIR Section 4.2, “Biological Resources,” and Table 4.2-1 evaluate 25 special-status species identified through database searches, screening their potential to occur or be affected based on habitat conditions and species requirements. Five special-status wildlife species were identified as potentially occurring within or adjacent to the project site and being affected by project implementation. The Draft EIR also evaluates potential effects on bats and migratory birds.

Under Impact 4.2-1 (pages 4.2-17 through 4.2-21), the Draft EIR acknowledges that nighttime lighting and noise may affect insect activity, wildlife foraging, nesting, roosting, migration, and habitat use. The analysis recognizes potential wildlife displacement and considers the magnitude, frequency, and duration of disturbance, predicted light trespass, sensitive seasonal periods, and availability of surrounding habitat. Under Impact 4.2-4, the Draft EIR further evaluates wildlife corridor function, including potential disturbance from lighting and noise and the absence of new physical barriers within the Parkway. Based on these considerations, the Draft EIR concludes that operational impacts on biological resources and wildlife movement would be less than significant. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment O8-28 Response: Draft EIR Chapter 7, “Cumulative Impacts and Other CEQA Considerations,” evaluates the proposed project in combination with the projects identified in Table 7-1, including the approved 90-foot campus cell tower, completed Jesuit High School Stadium Lighting Project, and proposed Ralph Richardson Center Modernization Project.

Section 7.1.3 (pages 7-2 through 7-5) evaluates cumulative visual impacts, including views from the American River Parkway and levee, and the contribution of stadium lighting to existing ambient illumination. The analysis considers the proposed lighting design, visibility of the stadium improvements, and surrounding development, concluding that the project's contribution to

cumulative visual and lighting impacts would be less than considerable. The approved cell tower is identified as an unlighted structure.

The cumulative biological resources analysis (pages 7-5 through 7-6) considers potential lighting and noise effects on Parkway habitat and wildlife. The operational noise analysis (page 7-10) considers the potential for overlapping stadium noise from Jesuit High School and acknowledges significant and unavoidable cumulative operational noise impacts. The transportation analysis (pages 7-12 through 7-13) specifically evaluates concurrent football games at Rio Americano and Jesuit High Schools, including combined vehicle queuing and circulation effects. Other potential cumulative impacts on Parkway resources, including recreation, land use, and water quality, are addressed in their respective sections of Chapter 7. Please also see Master Response 9: Cumulative.

Comment O8-29 Response: Draft EIR Section 4.4, "Transportation and Circulation" (pages 4.4-13 through 4.4-18), evaluates parking demand, vehicle queuing, pedestrian and bicycle safety, and emergency access under a high-attendance scenario of 3,400 people. The analysis identifies potentially significant transportation hazards without mitigation.

Mitigation Measure 4.4-3a requires the District to coordinate a shared parking agreement with Jesuit High School before the first applicable high-attendance event, including procedures to confirm parking availability and avoid conflicting events. Mitigation Measure 4.4-3b requires an Event Transportation Management Plan, prepared by a qualified transportation professional and implemented for each applicable event, addressing anticipated attendance, available parking, pedestrian crossings, staffing, circulation, and emergency access. Mitigation Measure 4.4-3c establishes additional access and circulation requirements. These measures require advance planning; evaluation following the first highly attended nighttime event provides an additional opportunity to identify necessary adjustments. The Draft EIR further states that if anticipated parking demand cannot be accommodated, the District must reduce vehicle parking demand or limit attendance. To ensure that attendance would be limited to that peak scenario evaluated in the EIR, refinements to Mitigation Measure 4.4-3c have been identified to implement this limit as a mandatory, enforceable condition; these edits are reflected in Chapter 3, "Errata," to this Final EIR. Emergency access is evaluated separately under Impact 4.4-4. Please also see Master Response 6: Parking Availability and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment O8-30 Response: The Sierra Club's support for and incorporation by reference of the October 16, 2026, comments submitted by the Save the American River Association (SARA) is noted. The environmental issues raised in SARA's letter are addressed separately in the responses to that letter and the applicable master responses. Please also see those responses for the District's consideration of the incorporated comments.

Comment O8-31 Response: Draft EIR Chapter 6, "Alternatives," evaluates the No Project Alternative and Alternative 2: Reconfigure Stadium and Athletic Fields, including their environmental effects and ability to achieve the project objectives. Section 6.6 identifies the No Project Alternative as environmentally superior. The Draft EIR

also acknowledges significant and unavoidable construction and operational noise impacts associated with the proposed project. The District's Board of Education will consider the alternatives, environmental findings, and public comments before determining whether to approve the project. Please also see Master Response 8: Alternatives.

Comment O8-32 Response: Draft EIR Section 5.9, “Land Use and Planning” (pages 5.9-29 through 5.9-30), evaluates the proposed project's consistency with the ARPP, the UARPPA, applicable PCZ provisions, and federal and state Wild and Scenic Rivers protections. The Draft EIR identifies Public Resources Code Section 5840 and explains that, although the District considers local zoning requirements not directly applicable, the PCZ's environmental protection objectives are considered in the CEQA analysis. Draft EIR Sections 4.1, “Aesthetics,” and 4.2, “Biological Resources,” further evaluate effects on Parkway scenic resources, wildlife habitat, and wildlife movement. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for additional discussion of the applicable statutory requirements and the basis for the District's position regarding local zoning.

Comment O8-33 Response: CEQA Guidelines Section 15088.5 establishes the circumstances under which an EIR must be recirculated before certification, including when significant new information is added that would deprive the public of a meaningful opportunity to comment on substantial adverse environmental effects or feasible measures to avoid or mitigate them. Clarifications or amplifications of information already presented in the Draft EIR do not necessarily require recirculation. The District will consider the comments, responses, and any resulting revisions in determining whether recirculation is required before certification of the Final EIR.

Comment O8-34 Response: The comment requests substantive written responses to the Sierra Club's comments and notification of the availability of the Final EIR and upcoming project hearings, including the November 17, 2026, Board meeting identified in the letter. Responses to the environmental issues raised in the Sierra Club's letter are provided in this Final EIR. The request for notification is noted, and notice of future proceedings will be provided in accordance with applicable CEQA and District requirements.

COMMENT LETTER O9. WATERBIRD HABITAT PROJECT, ANDREA WILLEY, M.D.; OCTOBER 13, 2026

Response to Comment Letter O9. Waterbird Habitat Project

Comment O9-1 Response: Comment letter 09 has been included in the project's administrative record. Responses to specific comments are provided in responses O9-2 through O9-44.

Comment O9-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted and the District thanks the commenter for their input.

Comment O9-3 Response: The Draft EIR contains a complete and reliable analysis of the physical environmental impacts on wildlife associated with construction and operation of the proposed project. The commenter's characterization of CEQA analysis as deficient and incomplete is noted.

Comment O9-4 Response: The Draft EIR recognizes and evaluates changes in the frequency and magnitude of potential operational disturbances. This comment does not detail why construction noise should be considered potentially significant. No changes to the Draft EIR are required.

Comment O9-5 Response: The analysis of noise impacts on biological resources under Impacts 4.2-1 and 4.2-4 in the Draft EIR does not use residential noise standards. Please see Master Response 2 for additional details regarding the analysis of operational noise impacts on biological resources. No changes to the Draft EIR are required.

Comment O9-6 Response: Please see Master Response 2 for details regarding the analysis of operational noise impacts on wildlife, including available data, as applicable to the proposed project. Whether the District adopts a statement of overriding considerations is a decision that falls outside the analysis of this EIR. However, if after reviewing the EIR, the District decides to approve the proposed project, it may exercise its discretion to determine whether it needs to adopt a Statement of Overriding Considerations based on its review of evidence in the record. If the District decides to approve the project despite any significant and unavoidable impacts identified in the Final EIR, it must adopt a Statement of Overriding Considerations (SOC) explaining why the project's benefits outweigh those remaining significant impacts (CEQA Guidelines Section 15093).

Comment O9-7 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-8 Response: For a more conservative analysis, the Draft EIR analysis considered modeled light and measured noise conditions at a similar event relative to existing (baseline) ambient conditions, rather than conditions during a stadium event at Rio Americano High School. Events currently do not occur at the same times, seasons, or frequency as they would under the proposed project. Please see Master Response 2 for details regarding the analysis of operational noise and lighting impacts on biological resources.

Comment O9-9 Response: The bat surveys conducted during one day and four evenings during the summer maternity season were appropriate for evaluating potential impacts from the proposed project. No indications of roosting were found. As described in the Draft EIR Appendix C, the project site primarily contains low-quality foraging habitat consisting of an artificial turf athletic field with adjacent strips of ruderal grasslands. The proposed project would cause little change to these low-quality foraging conditions during any hours that bats may be foraging. Emergence surveys conducted from sunset to one hour after sunset confirmed little foraging activity in the project area, observed only over the ruderal grassland swale adjacent to the athletic field. Though these emergence surveys were conducted to evaluate potential roosting, the hour after sunset is one of the peak foraging hours for most bat species. Very high-quality foraging habitat exists nearby in the Parkway and it is expected that bats will continue to favor this high-quality foraging habitat after project implementation.

Comment O9-10 Response: Operational noise and light impacts on northwestern pond turtle are addressed under Impact 4-1 (pages 4.2-17 through 4.2-21). As indicated in the Draft EIR analysis, operational lighting will not reach suitable habitat for northwestern pond turtle. Analysis of operational noise impacts addresses mobile (e.g., dispersing, foraging, basking) and sensitive (e.g., overwintering, nesting) life stages of northwestern pond turtles. The noise analysis considers the frequency, duration, and magnitude of anticipated operational noise, as well as the location of available habitat for these life stages. No changes to the Draft EIR are required.

Comment O9-11 Response: The Draft EIR analysis of impacts on biological resources followed the CEQA Guidelines, which require evaluation of impacts on endangered, rare, or threatened species. The Draft EIR addressed impacts on endangered, rare, or threatened species with the potential to be impacted by the proposed project, including northwestern pond turtles. No bobcats (*Lynx rufus*) or nocturnal mammals, other than bats, that have the potential to occur near the proposed project site are considered endangered, rare, or threatened under CEQA so do not require species-specific analysis. The Draft EIR evaluated potential impacts to migratory corridors and nursery sites for all native wildlife species under Impact 4.2-4 (pages 4.2-24 through 4.2-25).

Comment O9-12 Response: As discussed in response O6-9, the existing habitat at the project site provides little, low-quality foraging habitat, and minor intermittent changes in lighting and noise resulting from the proposed project would cause little change to these low-quality foraging conditions. It is expected that bats will continue to favor the adjacent high-quality foraging habitat in the Parkway, and would experience low or no altered foraging behavior at the project site. Please also see response to Comment O9-11 regarding evaluation of nocturnal mammals in the Draft EIR.

Comment O9-13 Response: The comment does not indicate how multi-season surveys would aid in the Draft EIR analysis of operational impacts of the proposed project on biological resources. Multi-season surveys under existing conditions would inform species presence and use of nearby habitat but would not inform potential operational impacts on these species.

As discussed in response to Comment-O9-9, the bat surveys conducted during one day and four evenings during the summer maternity season were appropriate for evaluating potential impacts from the proposed project. No indications of roosting were found and additional surveys during other seasons would provide no useful information for evaluating potential impacts to roosting bats. The project area primarily contains low quality foraging habitat, the proposed project would cause little change to these low-quality foraging conditions, and bats are expected to continue to favor the adjacent high-quality foraging habitat. Surveys to evaluate foraging at the project site would provide no useful information for evaluating potential impacts to foraging bats.

The Draft EIR analysis in Impacts 4.2-1 (pages 4.2-15 through 4.2-24) and 4.2-4 (pages 4.2-24 through 4.2-25) acknowledges the potential presence of bats, nesting birds, and northwestern pond turtles in habitat on and near the project site and evaluates operational impacts on these species. Please also see response to Comment O9-11 regarding the Draft EIR analysis of other mammal species. No changes to the Draft EIR are required.

Comment O9-14 Response: CEQA requires identification of an environmentally superior alternative, which is the alternative that would avoid or lessen significant and unavoidable impacts to the greatest extent, even if it is less desirable for other reasons. As indicated in Table 6-1 of the Draft EIR (page 6-17), Alternative 2: Reconfigure Stadium and Athletic Fields would not be considered the environmentally superior alternative because it would result in greater impacts to more environmental resources than the proposed project. For further explanation on this, please refer to Master Response 8: Alternatives.

Comment O9-15 Response: The project lighting was designed to minimize lighting trespass as much as possible, as demonstrated in the project-specific modeling prepared by Musco Lighting and included in Draft EIR Appendix B. Mitigation Measure 4.1-2 requires the lighting design to obtain a “pass” rating from the International Dark-Sky Association before construction. Furthermore, the “pass” rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Appendix B. While the project may may contribute to some minor and short-term seasonal skyglow in the immediate vicinity of the athletic field, which could contribute to minor localized changes in insect behavior, these changes are not expected to rise to a level that would alter food webs or nocturnal wildlife behavior in a significant way.

Comment O9-16 Response: Consistency of the proposed project with the policies in the American River Parkway Plan was evaluated under Impact 4.2-6 (pages 4.2-26 and 4.2-27) in the Draft EIR. As detailed in the Draft EIR, the policies contained in the American River 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. Project implementation would not impact habitat quality or quantity within the Parkway, including water quality in the American River, migratory corridors, or riparian vegetation. For more on this, please refer to Master Response 1.

Comment O9-17 Response: The Draft EIR provides an evaluation of cumulative impacts from implementation of the proposed project when considered in combination with the other cumulative projects under Section 7.1.3 (pages 7-2 through 7-13) of the Draft EIR in conformance with Section 15130 of the CEQA Guidelines. Existing school activities are considered as part of the existing (baseline) setting relative to potential impacts of the proposed project. For more on this, please refer to Master Response 9: Cumulative Impacts.

Comment O9-18 Response: The Draft EIR contains a complete and reliable analysis of the physical environmental impacts associated with construction and operation of the proposed project and does not require recirculation. The commenter's request for recirculation or supplemental analysis is noted.

Comment O9-19 Response: The Draft EIR contains a complete and reliable analysis of the physical environmental impacts associated with construction and operation of the proposed project and does not require recirculation. Light modeling and noise measurements followed standard protocols for assessing reasonably foreseeable future conditions under the proposed project. The Draft EIR evaluated reconfiguration of the proposed project under Alternative 2 in Section 6.4.2. Use of alternate existing stadiums was considered but dismissed from further evaluation because environmental impacts would be greater than or similar to those evaluated under the No Project alternative and proposed project. For more on this, please refer to Master Response 8: Alternatives.

Comment O9-20 Response: The Draft EIR evaluated reconfiguration of the proposed project under Alternative 2 in Section 6.4.2. Other alternatives, such as rescheduling to morning hours, were dismissed from further evaluation due to infeasibility. The comment does not propose a specific refined alternative for evaluation. For more on this, please refer to Master Response 8: Alternatives.

Comment O9-21 Response: CEQA requires that the NOP and Draft EIR be circulated for review and comment to responsible agencies, trustee agencies (including CDFW), local agencies, organizations, and the public (CEQA Guidelines §§15082, 15086, 15105). CEQA does not require focused or targeted consultation with any particular agency or advisory body during the preparation of an EIR, unless otherwise mandated by statute for specific resource topics (e.g., tribal consultation under AB 52, which did take place for the proposed project and is documented in the Draft EIR page 4.5-7). The purpose of circulation of the Draft EIR is to ensure all interested parties have the opportunity to provide input and raise concerns, which are then addressed in the Final EIR. The project team met with California Department of Fish and Wildlife staff on March 25, 2026, regarding evaluation of potential impacts of the proposed project on biological resources. Input was incorporated into the Draft EIR analysis. All comments received from agencies, organizations, and the public, including those from CDFW, Sacramento County Parks, and other organizations and individuals, have been considered and addressed in this Final EIR.

Comment O9-22 Response: Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife regarding operational light and noise impacts on biological resources. Operational impacts of the proposed project on native wildlife would

be less than significant such that no mitigation, such as adaptive monitoring, would be required.

Comment O9-23 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted and the District thanks the commenter for their input.

Comment O9-24 Response: Comment letter 09 has been included in the project's administrative record. Responses to specific comments are provided in responses O9-2 through O9-44.

Comment O9-25 Response: The District acknowledges the concerns raised about the effects of noise and lighting on wildlife species. The CEQA Guidelines require evaluation of impacts on endangered, rare, or threatened species. Since bobcat, coyote (*Canis latrans*), North American beaver (*Castor canadensis*), and North American river otter (*Lontra canadensis*) are not listed as endangered, rare, or threatened per the CEQA guidelines, no species-specific evaluation is included in the Draft EIR. However, the Draft EIR does evaluate potential impacts to established wildlife corridors (i.e., the Parkway) and native wildlife nursery sites under Impact 4.2-4 (page 4.2-24), which considers impacts to all native wildlife species. As referenced in response to Comment-O9-16, 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 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.

The Draft EIR evaluated potential presence of and impacts to special status salmonids in Table 4.2-1 under Section 4.2.1 (page 4.2-5). As indicated, project implementation would not impact aquatic habitat in the American River. Please see response to Comment-O9-11 regarding evaluation of impacts to endangered, rare, or threatened species. Please see Master Response 2 for details regarding the analysis of operational noise impacts on wildlife, including available data, as applicable to the proposed project.

Comment O9-26 Response: An evaluation of the cumulative impacts of the project on biological resources in conjunction with the Rio Americano High School Cell Tower Project is included in the Draft EIR under Section 7.1.3 (pages 7-5 and 7-6).

Comment O9-27 Response: Roads near the project site do not provide native wildlife corridors, like the Parkway. Potential interference with wildlife use of resident or migratory wildlife corridors is evaluated under Impact 4.2-4 (pages 4.2-24 through 4.2-25).

Federal and state laws protecting biological resources that are relevant to the proposed project are evaluated in Section 4.2.2 (pages 4.2-10 through 4.2-12) of the Draft EIR.

Comment O9-28 Response: The Draft EIR recognizes and evaluates changes in the frequency and magnitude of potential operational disturbances from lighting and noise. Existing large-scale developments that support high-use, such as the California State Fair at the California Exposition (Cal Expo) are considered a part of the existing

(baseline) environmental conditions. The Draft EIR evaluates changes to sensitive resources by comparing post-project conditions against baseline conditions.

The requirements contained in American River Parkway Plan ensure that natural resources, ecosystem health, and high-value habitats are protected before and during development. Consistency of the proposed project with the policies in the American River Parkway Plan was evaluated under Impact 4.2-6 (pages 4.2-26 and 4.2-27) in the Draft EIR. Please see Comment-O9-16 regarding evaluation of impacts to and consistency with the American River Parkway Plan.

Evaluation of the cumulative impacts of the project in conjunction with projects, including impacts to biological resources, is included in the Draft EIR under Section 7.1.3 (pages 7-2 through 7-13) of the Draft EIR.

Comment O9-29 Response: The Draft EIR evaluates impacts of lighting noise, and traffic to sensitive resources and receptors. Please see Chapter 4.1 Aesthetics; Chapter 4.2, Biological resources; Chapter 4.3 Noise and Vibration; and Chapter 4.4, Transportation and Circulation. Evaluation of the cumulative impacts of the project in conjunction with projects, including impacts to biological resources, is included in the Draft EIR under Section 7.1.3 (pages 7-2 through 7-13) of the Draft EIR.

Comment O9-30 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-31 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-32 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-33 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-34 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-35 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-36 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-37 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-38 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-39 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-40 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-41 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-42 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-43 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment O9-44 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

2.2.4 INDIVIDUAL

COMMENT LETTER I1. JS ADAMS; OCTOBER 14, 2026

Response to Comment Letter I1. JS Adams

Comment I1-1 Response: The potential environmental impacts associated with the proposed stadium improvements, including increased attendance, nighttime lighting, noise, traffic, and pedestrian and bicycle safety, are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.3, "Noise and Vibration," and 4.4, "Transportation and Circulation." These sections identify feasible mitigation measures, where appropriate, to address potentially significant impacts. The Draft EIR concludes that operational stadium event noise would remain significant and unavoidable after implementation of feasible mitigation. Please see also Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors, Master Response 5: Trip Generation and Vehicle Miles Traveled, Master Response 6: Parking Availability, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I1-2 Response: Potential impacts associated with nighttime lighting and operational noise on the surrounding community are evaluated in Draft EIR Sections 4.1, "Aesthetics," and 4.3, "Noise and Vibration," respectively. The Draft EIR identifies mitigation measures to reduce these impacts; however, operational stadium event noise would remain significant and unavoidable after implementation of feasible mitigation. Potential effects of nighttime lighting and operational noise on wildlife and habitat within the American River Parkway are evaluated in Draft EIR Section 4.2, "Biological Resources," which concludes that these operational impacts would be less than significant. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I1-3 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation, which addresses nighttime event management, security, emergency access, and evacuation planning. Potential impacts on emergency evacuation and access are also evaluated in Draft EIR Section 5.7, "Hazards and Hazardous Materials," and Section 4.4, "Transportation and Circulation." No changes to the Draft EIR are required.

Comment I1-4 Response: Raider Stadium is an existing outdoor track and field facility on the Rio Americano High School campus. As described in Draft EIR Chapter 6, "Alternatives," the track and football field have existed in their current locations since 1963, with subsequent stadium improvements completed in 2006 and 2019. Potential environmental impacts associated with the proposed stadium improvements and their proximity to the American River Parkway are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," 4.3, "Noise and Vibration," 5.9, "Land Use and Planning," and 5.13, "Recreation." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I1-5 Response: The suggestion that Rio Americano High School develop an environmental science and education program using the American River Parkway as a living classroom is noted. The comment does not identify a deficiency in the environmental analysis contained in the Draft EIR. No changes to the Draft EIR are required.

Comment I1-6 Response: Draft EIR Chapter 6, "Alternatives," evaluates alternatives intended to avoid or substantially lessen the proposed project's significant environmental impacts, including operational stadium noise. Section 6.3 discusses alternatives considered but not carried forward for detailed evaluation, including an off-campus stadium location, rescheduling activities to morning hours, and use of other existing stadiums. These alternatives were rejected based on considerations including potential additional environmental impacts, scheduling constraints, and the ability to meet project objectives. Of the alternatives evaluated in detail, the No Project Alternative would avoid the significant and unavoidable operational stadium event noise impact but would not meet the project objectives. Alternative 2, which would relocate Raider Stadium farther from the American River Parkway, would result in slightly greater operational noise impacts because of its proximity to residences along American River Drive (Draft EIR Section 6.5.11). Please see also Master Response 8: Alternatives, which addresses the range of alternatives considered under CEQA. No changes to the Draft EIR are required.

Comment I1-7 Response: As explained in Draft EIR Section 4.3, "Noise and Vibration" (pages 4.3-15 and 4.3-16), the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element. Nevertheless, the Draft EIR uses applicable Sacramento County noise standards as thresholds for evaluating potential environmental impacts under CEQA. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I1-8 Response: Draft EIR Section 4.1, "Aesthetics," evaluates potential nighttime lighting impacts, including light trespass, glare, and skyglow, based on the lighting analysis prepared by Musco Lighting and included as Appendix B. The analysis includes photographs of existing nighttime conditions and visual simulations of the proposed stadium lighting from surrounding viewpoints, including the American River Parkway. Draft EIR Section 4.2, "Biological Resources," identifies the proposed lighting characteristics and evaluates potential effects of operational nighttime lighting on wildlife within the Parkway. Mitigation Measure 4.1-2 requires the District to submit the proposed lighting design to the International Dark Sky Association for a Design Analysis and obtain a "pass" rating and approval letter before construction may commence. If the design does not meet the program guidelines, it must be refined and resubmitted until approval is obtained. Furthermore, the required "pass" rating has since been obtained and is attached to this FEIR as Appendix B. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I1-9 Response: Draft EIR Section 3.2.3, "Schedule of Uses" (pages 3-6 through 3-9), describes anticipated stadium operations, including event frequency, attendance, scheduling, and nighttime lighting use. Table 3-1 (page 3-9) presents existing and

proposed stadium uses based on District attendance records and historical ticket counts. The Draft EIR evaluates both typical attendance and a conservative maximum-attendance scenario of approximately 3,400 people, including associated noise, traffic, and parking impacts. No changes to the Draft EIR are required.

Comment I1-10 Response: Draft EIR Section 3.2.2, "Operations Plan," describes the District's use of Night Event Management Standards in conjunction with existing school policies and California Interscholastic Federation Game Management Guidelines. These guidelines address event conduct, volunteer responsibilities, on- and off-site parking management, and operation of the sound system. In addition, Draft EIR Mitigation Measure 4.4-3b requires implementation of an Event Transportation Management Plan for nighttime stadium events anticipated to require off-site parking, including event staffing, parking controls, pedestrian safety measures, and monitoring. Please see also Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation, for additional discussion of event management and security. No changes to the Draft EIR are required.

Comment I1-11 Response: Draft EIR Section 5.9, "Land Use and Planning," evaluates potential conflicts with land use plans, policies, and regulations, including the Sacramento County Parkway Corridor Combining Zone and American River Parkway Plan. Although the District is not directly subject to County zoning requirements, the Draft EIR evaluates the proposed project's physical environmental impacts on surrounding residential areas and the American River Parkway in Sections 4.1, "Aesthetics," 4.2, "Biological Resources," 4.3, "Noise and Vibration," and 5.13, "Recreation." The Draft EIR acknowledges that operational stadium event noise would remain significant and unavoidable after mitigation. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I1-12 Response: Draft EIR Section 4.0.2 (page 4.0-1) identifies existing physical environmental conditions in 2025 as the baseline for evaluating project impacts. As described in Draft EIR Chapter 3, "Project Description," (pages 3-1 and 3-4) existing stadium operations include the use of eight mobile diesel-powered LED light towers for certain evening athletic activities, primarily during winter months. As further discussed in response to comment O7-10, the District began using portable lighting in 2022 and continued its use during the Draft EIR baseline period. Accordingly, the existing use of portable lighting is included in the environmental baseline, while the proposed permanent stadium lighting and expanded nighttime operations are evaluated as part of the proposed project. No changes to the Draft EIR are required.

Comment I1-13 Response: The Draft EIR evaluates potential impacts associated with ongoing stadium operations, including nighttime lighting, noise, increased attendance, and recreational use. Operational lighting impacts are evaluated in Draft EIR Section 4.1, "Aesthetics," under Impact 4.1-1. Operational noise impacts are evaluated in Section 4.3, "Noise and Vibration," under Impacts 4.3-1 and 4.3-2. Potential effects on wildlife and habitat within the American River Parkway, including operational lighting and noise, are evaluated in Section 4.2, "Biological Resources," under Impacts 4.2-1 through 4.2-6. Impacts associated with

recreational facilities and their use are evaluated in Section 5.13, "Recreation." No changes to the Draft EIR are required.

Comment I1-14 Response: The cumulative impact analysis presented in Draft EIR Section 7.1.3, "Cumulative Impact Analysis," includes the Rio Americano High School cell tower among the projects considered in combination with the proposed stadium improvements. The cell tower is identified in Draft EIR Table 7-1 (page 7-2), which lists the projects included in the cumulative analysis. No changes to the Draft EIR are required. Please see also Master Response 9: Cumulative Analysis.

Comment I1-15 Response: Draft EIR Section 4.4, "Transportation and Circulation," evaluates event-related parking demand, vehicle circulation, and pedestrian and bicycle safety, supported by the Local Transportation Analysis included in Appendix E. The analysis considers a conservative maximum attendance scenario of approximately 3,400 people. Mitigation Measure 4.4-3a requires the District to coordinate with Jesuit High School for a Shared Parking Use Agreement to accommodate parking demand during events anticipated to exceed available on-site parking capacity. Mitigation Measures 4.4-3b and 4.4-3c establish additional event transportation, parking, and circulation management requirements. Minor revisions are made to Mitigation Measures 4.4-3b and 4.4-3c to clarify implementation procedures, have clear performance standards, and limit event attendance associated with proposed stadium improvements to 3,400; these revisions are shown in Chapter 3, "Errata," to this Final EIR. Please see also Master Response 6: Parking Availability. No additional changes to the Draft EIR are required.

COMMENT LETTER I2. WILLIAMS E. AVERY, PHD; OCTOBER 15, 2026

Response to Comment Letter I2. Williams E. Avery, PhD

Comment I2-1 Response: Please see response to comment I1-1.

Comment I2-2 Response: Please see response to comment I1-2.

Comment I2-3 Response: Please see response to comment I1-3.

Comment I2-4 Response: Please see response to comment I1-4.

Comment I2-5 Response: Please see response to comment I1-5.

Comment I2-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I2-7 Response: Please see response to comment I1-8.

Comment I2-8 Response: Please see response to comment I1-9.

Comment I2-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I2-10 Response: Please see response to comment I1-12.

Comment I2-11 Response: Please see response to comment I1-13.

Comment I2-12 Response: Please see response to comment I1-14.

Comment I2-13 Response: Please see response to comment I1-15.

COMMENT LETTER I3. ROGER BACCIGALUPPI; OCTOBER 13, 2026

Response to Comment Letter I3. Roger Baccigaluppi

COMMENT I3-1 **The commenter expresses concern that the proposed stadium lighting will adversely affect the American River Parkway.**

Comment I3-1 Response: Potential effects to the American River Parkway from implementing the proposed project are evaluated in Draft EIR Section 4.1, "Aesthetics," Section 4.2, "Biological Resources," Section 5.9, "Land Use and Planning," and Section 5.13, "Recreation." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

COMMENT LETTER I4. CHRIS BALAAM; OCTOBER 15, 2026

Response to Comment Letter I4. Chris Balaam

Comment I4-1 Response: The information regarding the commenter's personal background is noted. The District notes that the Rio Americano High School campus already has an existing stadium: Raider Stadium. The purpose of the proposed project is to provide permanent nighttime lighting for on-campus high school sporting events. The commenter's opposition to the project is noted.

COMMENT LETTER I5. RACHEL BAUER; OCTOBER 15, 2026

Response to Comment Letter I5. Rachel Bauer

Comment I5-1 Response: Please see response to comment I1-1.

Comment I5-2 Response: Please see response to comment I1-2.

Comment I5-3 Response: Please see response to comment I1-4.

Comment I5-4 Response: Please see response to comment I1-5.

Comment I5-5 Response: Please see response to comment I1-6 and I1-7.

Comment I5-6 Response: Please see response to comment I1-8.

Comment I5-7 Response: Please see response to comment I1-9.

Comment I5-8 Response: Please see responses to comments I1-10 and I1-11.

Comment I5-9 Response: Please see response to comment I1-12.

Comment I5-10 Response: Please see response to comment I1-13.

Comment I5-11 Response: Please see response to comment I1-14.

Comment I5-12 Response: Please see response to comment I1-15.

COMMENT LETTER I6. TWANET BENDER; OCTOBER 14, 2026

Response to Comment Letter I6. Twanet Bender

Comment I6-1 Response: Please see response to comment I1-1.

Comment I6-2 Response: Please see response to comment I1-2.

Comment I6-3 Response: Please see response to comment I1-3.

Comment I6-4 Response: Please see response to comment I1-4.

Comment I6-5 Response: Please see response to comment I1-5.

Comment I6-6 Response: Please see response to comment I1-6.

Comment I6-7 Response: Please see response to comment I1-7.

Comment I6-8 Response: Please see response to comment I1-8.

Comment I6-9 Response: Please see response to comment I1-9.

Comment I6-10 Response: Please see response to comment I1-10.

Comment I6-11 Response: Please see response to comment I1-11.

Comment I6-12 Response: Please see response to comment I1-12.

Comment I6-13 Response: Please see response to comment I1-13.

Comment I6-14 Response: Please see response to comment I1-14.

Comment I6-15 Response: Please see response to comment I1-15.

COMMENT LETTER I7. SYDNEY BRAHM; OCTOBER 15, 2026

Response to Comment Letter I7. Sydney Brahm

Comment I7-1 Response: Please see response to comment I1-1.

Comment I7-2 Response: Please see response to comment I1-2.

Comment I7-3 Response: Please see response to comment I1-3.

Comment I7-4 Response: Please see response to comment I1-4.

Comment I7-5 Response: Please see response to comment I1-5.

Comment I7-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I7-7 Response: Please see response to comment I1-8.

Comment I7-8 Response: Please see response to comment I1-9.

Comment I7-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I7-10 Response: Please see response to comment I1-12.

Comment I7-11 Response: Please see response to comment I1-13.

Comment I7-12 Response: Please see response to comment I1-14.

Comment I7-13 Response: Please see response to comment I1-15.

COMMENT LETTER I8. BETTE BURROWS; OCTOBER 15, 2026

Response to Comment Letter I8. Bette Burrows

Comment I8-1 Response: Please see response to comment I1-2.

Comment I8-2 Response: Please see response to comment I1-1.

Comment I8-3 Response: Please see response to comment I1-2.

Comment I8-4 Response: Please see response to comment I1-3.

Comment I8-5 Response: Please see response to comment I1-4.

Comment I8-6 Response: Please see response to comment I1-5.

Comment I8-7 Response: Please see responses to comments I1-6 and I1-7.

Comment I8-8 Response: Please see response to comment I1-8.

Comment I8-9 Response: Please see response to comment I1-9.

Comment I8-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I8-11 Response: Please see response to comment I1-12.

Comment I8-12 Response: Please see response to comment I1-13.

Comment I8-13 Response: Please see response to comment I1-14.

Comment I8-14 Response: Please see response to comment I1-15.

COMMENT LETTER I9, PATRICK CARROLL, MD, SEPTEMBER 26, 2026

Response to Comment Letter I9, Patrick Carroll, MD

Comment I9-1 Response: This comment letter (I9), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I9-2 through I9-15.

Comment I9-2 Response: Please see response to comment I1-1.

Comment I9-3 Response: Please see response to comment I1-2.

Comment I9-4 Response: Please see response to comment I1-3.

Comment I9-5 Response: Please see response to comment I1-4.

Comment I9-6 Response: Please see response to comment I1-5.

Comment I9-7 Response: Please see responses to comments I1-6 and I1-7.

Comment I9-8 Response: Please see response to comment I1-8.

Comment I9-9 Response: Please see response to comment I1-9.

Comment I9-10 Response: Please see response to comment I1-10.

Comment I9-11 Response: Please see response to comment I1-11.

Comment I9-12 Response: Please see response to comment I1-12.

Comment I9-13 Response: Please see response to comment I1-13.

Comment I9-14 Response: Please see response to comment I1-14.

Comment I9-15 Response: Please see response to comment I1-15.

COMMENT LETTER I10. KEITH AND HEIDI COLLINS; OCTOBER 16, 2026

Response to Comment Letter I10. Keith and Heidi Collins

Comment I10-1 Response: Responses to individual comments are provided in I10-2 through I10-8.

Comment I10-2 Response: The District appreciates the support for the proposed project expressed by the commenters and the other 19 nearby residents.

Comment I10-3 Response: The commenters' letter was received by the District within the established Draft EIR comment period. The commenters' information regarding copies to the County District Supervisor and the Rio Americano High School athletic director are noted.

Comment I10-4 Response: Please see response to comment I10-2.

COMMENT LETTER I11, BETTY COOPER, SEPTEMBER 14, 2026

Response to Comment Letter I11, Betty Cooper

COMMENT-I11-1 **The commenter expresses concern that the proposed stadium lighting along nighttime event noise will adversely affect migratory birds along the American River, and that the American River is protected by the Wild and Scenic Rivers Act.**

Comment I11-1 Response: Potential effects on migratory birds in the nearby American River Parkway from implementing the proposed project are evaluated in Draft EIR Section 4.2, "Biological Resources," Impact 4.2-1 (page 4.2-15 through 4.2-24). As explained in detail therein, the impact of operational use of lighting and operational noise on migratory birds would be less than significant. Furthermore, implementation of Mitigation Measures 4.2-1a and 4.2-1e, in addition to the required "pass" rating from the DarkSky Association, would reduce construction and operational impacts on nesting birds to a less-than-significant level (Draft EIR pages 4.22-4.2-24). Finally, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Attachment B. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

COMMENT-I11-2 **The commenter states that local residents will be adversely affected during the nighttime hours because the school does not have enough on-site parking.**

Comment I11-2 Response: Please see Master Response 6: Parking Availability. No changes to the Draft EIR are required.

COMMENT LETTER I12. KATHERINE COULTER; OCTOBER 15, 2026

Response to Comment Letter I12. Katherine Coulter

Comment I12-1 Response: Please see response to comment I1-1.

Comment I12-2 Response: Please see response to comment I1-3.

Comment I12-3 Response: Please see response to comment I1-4.

Comment I12-4 Response: Please see response to comment I1-2.

Comment I12-5 Response: Please see response to comment I1-2.

Comment I12-6 Response: Please see response to comment I1-5.

Comment I12-7 Response: Please see response to comment I1-6 and I1-7.

Comment I12-8 Response: Please see response to comment I1-8.

Comment I12-9 Response: Please see responses to comments I1-9, I1-10, and I1-11.

Comment I12-10 Response: Please see response to comment I1-13.

Comment I12-11 Response: Please see response to comment I1-14.

Comment I12-12 Response: Please see response to comment I1-15.

Comment I12-13 Response: The Draft EIR fully evaluates the project's potential impacts on the Parkway, and includes feasible mitigation measures (where necessary) to reduce the project's potentially signiticant and significant impacts. With regards to alternatives, please see response to comment I1-6 and Master Response 8: Alternatives.

COMMENT LETTER I13, CATHERINE DEE, SEPTEMBER 27, 2026

Response to Comment Letter I13, Catherine Dee

Comment I13-1 Response: Please see response to comment I1-1.

Comment I13-2 Response: Please see response to comment I1-2.

Comment I13-3 Response: Please see response to comment I1-3.

Comment I13-4 Response: Please see response to comment I1-4.

Comment I14-5 Response: Please see response to comment I1-5.

Comment I13-6 Response: Please see response to comment I1-6.

Comment I13-7 Response: Please see response to comment I1-7.

Comment I13-8 Response: Please see response to comment I1-8.

Comment I13-9 Response: Please see response to comment I1-9.

Comment I13-10 Response: Please see response to comment I1-10.

Comment I13-11 Response: Please see response to comment I1-11.

Comment I13-12 Response: Please see response to comment I1-12.

Comment I13-13 Response: Please see response to comment I1-13.

Comment I13-14 Response: Please see response to comment I1-14.

Comment I13-15 Response: Please see response to comment I1-15.

COMMENT LETTER I14. DEL AND CONNIE DEL REAL; SEPTEMBER 13, 2026

Response to Comment Letter I14. Del and Connie Del Real

Comment I14-1 Response: This comment letter (I14), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I14-2 through I14-15.

Comment I14-2 Response: Please see response to comment I1-1.

Comment I14-3 Response: Please see response to comment I1-2.

Comment I14-4 Response: Please see response to comment I1-3.

Comment I14-5 Response: Please see response to comment I1-4.

Comment I14-6 Response: Please see response to comment I1-5.

Comment I14-7 Response: Please see responses to comments I1-6 and I1-7.

Comment I14-8 Response: Please see response to comment I1-8.

Comment I14-9 Response: Please see response to comment I1-9.

Comment I14-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I14-11 Response: Please see response to comment I1-12.

Comment I14-12 Response: Please see response to comment I1-13.

Comment I14-13 Response: Please see response to comment I1-14.

Comment I14-14 Response: Please see response to comment I1-15.

COMMENT LETTER I15. SARA DENZLER; OCTOBER 14, 2026

Response to Comment Letter I15. Sara Denzler

Comment I15-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I15-2 Response: The information regarding the commenter's personal background is noted.

Comment I15-3 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I15-4 Response: As stated in Draft EIR Section 3, "Project Description" (pages 3-1 and 3-4), the proposed project would include an increase in the amount of available bleacher seating from approximately 288 people under existing conditions to 2,575 people. The Draft EIR evaluates the potential environmental impacts associated with project-related noise, lighting, and traffic in Section 4.3, "Noise and Vibration," Section 4.1, "Aesthetics," and Section 4.4, "Transportation and Circulation." Impacts associated with biological resources are evaluated in Draft EIR Section 4.2, "Biological Resources," and impacts associated with recreation are evaluated in Draft EIR Section 5.13, "Recreation." No significant impacts on the American River Parkway were identified in the Draft EIR from project-related noise, lighting, traffic, or recreation. Feasible mitigation measures that address construction-related impacts to biological resources are included in the Draft EIR (pages 4.2-22 and 4.2-23), which would reduce these potentially significant biological resources impacts to a less-than-significant level.

Comment I15-5 Response: Feasible mitigation measures to reduce the project's construction- and operation-related impacts are included throughout the topic areas evaluated in the Draft EIR, where necessary. As explained in Draft EIR Section 7.4, "Significant and Unavoidable Adverse Impacts," the only impact that would remain significant and unavoidable even after implementation of all feasible mitigation measures would be generation of a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards, including temporary short-term construction noise and operational stadium event noise. Operational impacts on wildlife, including lighting, noise, and people, are evaluated in Draft EIR Section 4.2, "Biological Resources." Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment I15-6 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; nevertheless, the District responds as follows: Raider Stadium is an existing outdoor track and field facility with bleacher seating, a scoreboard, and a public address system at the Rio Americano High School campus. Although the proposed permanent stadium lighting and additional bleacher seating would allow for increased attendance at and additional nighttime use of the stadium, particularly for football games, the stadium and associated athletic fields are existing facilities. The suggestion that Rio Americano High School develop an environmental science and education program using the American River Parkway as a living classroom is noted. The comment does not

identify a deficiency in the environmental analysis contained in the Draft EIR. No changes to the Draft EIR are required.

Furthermore, this would not achieve any of the project objectives so further consideration of this suggested alternative is not required here.

Comment I15-7 Response: The analyses requested by the commenter regarding the effects of ongoing stadium operations are presented and evaluated in the Draft EIR. Operational effects of nighttime lighting are evaluated in Impact 4.1-1 and Impact 4.1-2. Operational noise effects are evaluated in Impact 4.3-1 and Impact 4.3-2. Operational impacts on wildlife, including lighting, noise, and people, along with other biological resources are evaluated in Impacts 4.2-1 through 4.2-6. Operational impacts related to recreation, including traffic and event impacts on the American River Parkway, are evaluated in Impact 5.13-2. No changes to the Draft EIR are required.

Comment I15-8 Response: The commenter does not identify or provide any suggestions regarding another alternative that should be evaluated that is different from the alternatives presented and evaluated in Draft EIR Section 6, "Alternatives," nor does the commenter identify how such an alternative would reduce stadium event noise from increased attendance to a less-than-significant level. As explained in Draft EIR Section 6, "Alternatives," the alternative that would result in less-than-significant noise impacts from stadium event noise would be the No Project Alternative. Under this 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 the project objectives. For more on this, please also see Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I15-9 Response: As stated on Draft EIR page 4.3-15, the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element. Please see the detailed discussion regarding the use of Sacramento County Noise Ordinance standards as CEQA thresholds for the proposed project contained in Draft EIR Section 4.3, "Noise and Vibration," on pages 4.3-15 and 4.3-16. Please also see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I15-10 Response: Draft EIR Section 4.1, "Aesthetics," contains detailed analyses evaluating the project's potential to create glare and skyglow, as well as a photometric analysis performed by Musco Lighting that is discussed in Section 4.1 and attached to the Draft EIR as Appendix B. Draft EIR Section 4.1 presents information related to the American River Parkway and the project's potential effects on the Parkway, including photos of existing conditions and visual simulations showing views of the project site with the proposed stadium lighting as viewed from the Parkway at dusk and in darkness. In accordance with Mitigation Measure 4.1-2 (Draft EIR page 4.1-26), following publication of the Draft EIR, the District submitted the proposed lighting design to the International Dark Sky Association for a Design Analysis and requested a determination as to whether the design meets the program guidelines. The proposed project meets Dark Sky Outdoor Sports

Lighting Program criteria and has received a "pass" rating for lighting performance (see Appendix B to this FEIR). No changes to the Draft EIR are required.

Comment I15-11 Response: Please see Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation, regarding night-event management standards, including facility-use rules, staffing, security, parking controls, and public-address system limitations. No changes to the Draft EIR are required.

Comment I15-12 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use regarding the Urban American River Parkway Preservation Act and American River Parkway Plan. No changes to the Draft EIR are required.

Comment I15-13 Response: The District maintains records related to attendance at school events, including ticket counts. The information related to existing and projected attendance at school events at Raider Stadium, presented in Draft EIR Table 3-1, is based on District records and ticket counts for daytime and nighttime sporting events. The methodology and details regarding the data presented in Draft EIR Table 3-1 (page 3-9) are described in Draft EIR Section 3.2.3, "Schedule of Uses," on pages 3-6 through 3-8. The Draft EIR evaluates both a projected average attendance and a projected maximum attendance scenario and quantifies the potential impacts related to noise, traffic, and parking. No changes to the Draft EIR are required.

Comment I15-14 Response: The Draft EIR uses the existing environmental conditions as its baseline. As stated in Draft EIR Chapter 3, "Project Description," and in other topic area sections throughout the Draft EIR, the District has been and continues to use eight mobile diesel-powered LED light towers at the existing Raider Stadium, primarily during winter months when sunset occurs in the afternoon. These are existing conditions and therefore are included in the environmental baseline. For more on this, please refer to Master Response 10: Project Description. No changes to the Draft EIR are required.

Comment I15-15 Response: The cumulative analysis contained in the Draft EIR includes the cell tower previously installed at the Rio Americano High School campus. Please see Draft EIR Table 7-1 (page 7-2), which presents the projects considered in the cumulative analysis and includes the cell tower at Rio Americano High School. For more on this, please refer to Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I15-16 Response: The detailed analysis requested by the commenter is contained in Draft EIR Appendix E, "Local Transportation Analysis" (Kimley Horn 2026, pages 13 through 16), and is summarized in Draft EIR Section 4.4, "Transportation and Circulation" (pages 4.4-4 through 4.4-6 and 4.4-12 through 4.4-17). Please see Master Response 6: Parking Availability regarding projected attendance, on-site and off-site parking, and the shared parking arrangement with Jesuit High School. No changes to the Draft EIR are required.

COMMENT LETTER I16. GAIL DERIN; OCTOBER 15, 2026

Response to Comment Letter I16. Gail Derin

Comment I16-1 Response: Please see responses to comments I1-1 and I1-2 regarding potential project-related effects on the American River Parkway, surrounding community, wildlife, and habitat. Please see also Master Response 9: Cumulative Analysis and response to comment I1-14 regarding the cumulative analysis of the proposed project and the cell tower at Rio Americano High School. No changes to the Draft EIR are required.

COMMENT LETTER I17, BARBARA DUGAL, SEPTEMBER 2, 2026

Response to Comment Letter I17, Barbara Dugal

Comment I17-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER I18. BARBARA DUGAL; OCTOBER 16, 2026

Response to Comment Letter I18. Barbara Dugal

Comment I18-1 Response: The District acknowledges that your comment letter on the Notice of Preparation was inadvertently omitted from the compilation in the Draft EIR of comments received on the District's Notice of Preparation. Your comment letter has been included in the Final EIR in an updated compilation as part of Chapter 3, Errata, as well as addressed through Responses to Comments IX-2 through IX-X below. As such, they will also be included in the administrative record for the proposed project.

Comment I18-2 Response: Event management and compliance with District operating procedures is an integral part of existing operations management of the Rio Americano High School. The proposed project would accommodate additional events due to expanded use of the stadium during nighttime and evening events as well as increased attendance at events, which would be subject to all existing District operating standards.

Comment I18-3 Response: Draft EIR Section 3.1.1, "Regional and Local Project Location," identifies the Rio Americano High School campus at 4540 American River Drive and provides the assessor's parcel number used to identify the project site. The Draft EIR also provides geographic exhibits showing the campus location and describes the locations of the proposed stadium improvements, including new lighting, bleachers, and pedestrian access lighting.

The project would be constructed within the existing school campus, and its physical footprint is described in Draft EIR Chapter 3, "Project Description." The discrepancy between the assessor's parcel numbers identified in the Draft EIR and those provided by the commenter should be verified against Sacramento County assessor records, with any confirmed correction reflected in the Final EIR. Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I18-4 Response: Draft EIR Chapter 3, "Project Description," identifies the existing physical characteristics of Raider Stadium, including the artificial turf athletic field, surrounding track, existing bleacher seating, scoreboard, public address system, and portable lighting. The Draft EIR distinguishes these existing facilities from the proposed improvements, including four new 80-foot lighting standards, expanded seating capacity from approximately 288 to 2,575 seats, an upgraded public address system, a new press box, and pedestrian safety lighting.

Draft EIR Table 3-1 identifies the existing and anticipated future uses of the stadium and provides the operational assumptions used in the environmental analyses. The use of the term "Raider Stadium" does not change the physical characteristics or operational assumptions evaluated in the Draft EIR. Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I18-5 Response: Draft EIR Chapter 3, "Project Description," identifies the location and physical characteristics of the proposed improvements. The geographic extent of the environmental analyses is not limited to the school property boundary. The

Draft EIR evaluates potential off-site effects based on the environmental resource and the locations where project-related impacts could occur. For example, Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 4.3, "Noise and Vibration," evaluate potential effects on the American River Parkway and nearby residential areas. Section 4.4, "Transportation and Circulation," evaluates effects on the surrounding transportation network. Please see Master Response 10: Accurate, Stable, and Finite Project Description for additional discussion of the environmental setting and project boundaries.

Comment I18-6 Response: Draft EIR Sections 4.1 through 4.4 evaluate potential effects on aesthetics, biological resources, noise and vibration, and transportation and circulation, including effects extending beyond the campus. The biological resources analysis evaluates the potential for construction and operational disturbance to wildlife within adjacent Parkway habitat. The noise analysis considers measurements collected at and around the project site, including nearby residential locations and locations across the American River. The transportation analysis evaluates roadways and intersections serving the school rather than limiting its evaluation to on-campus circulation. Potential cumulative impacts are evaluated in Draft EIR Section 7.1, "Cumulative Impacts." Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife; Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors; Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation; and Master Response 9: Cumulative Impacts.

Comment I18-7 Response: Draft EIR Section 5.15, "Wildland Fire Hazards," evaluates the proposed project's potential effects related to wildfire risk. The Draft EIR identifies the project site as an existing developed school campus that is not within or near a designated fire hazard severity zone and concludes that the proposed improvements would not exacerbate wildland fire risks. Draft EIR Impact 5.7-5 (pages 5.7-24 through 5.7-25) separately evaluates potential interference with emergency response and evacuation. As discussed in Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation, Rio Americano High School is subject to the District's Comprehensive School Safety Plan requirements. Draft EIR Mitigation Measure 4.4-3b also requires measures to prevent event-related parking and vehicle queues from obstructing fire lanes, emergency-access routes, and other circulation facilities. Please see Master Response 7 for additional discussion of event management and emergency response procedures.

Comment I18-8 Response: Draft EIR Section 3.2.2, "Operations Plan" (page 3-6), identifies Night Event Management Standards that would apply to stadium events in conjunction with the school's existing operating procedures. These include applicable school safety and athletic event management procedures. Draft EIR Mitigation Measure 4.3-1b establishes specific operational noise controls, including public address system requirements, restrictions on artificial noisemakers, and limits on amplified sound and band activity after 10:00 p.m. Draft EIR Mitigation Measures 4.4-3a through 4.4-3c establish additional requirements for event-related parking and transportation management. Please see Master Response 4: Mitigation and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation for further discussion of the enforceability and implementation of these measures.

Comment I18-9 Response: Draft EIR Section 4.4, "Transportation and Circulation," and Appendix E, "Localized Transportation Analysis," evaluate potential transportation and safety impacts associated with increased event attendance at Rio Americano High School. The analysis focuses on roadways and intersections providing primary access to the campus, including American River Drive, Saverien Drive, and Fair Oaks Boulevard. The concern regarding reduced available travel width on Wixford Way when vehicles are parked along both sides of the roadway is acknowledged.

Draft EIR Impact 4.4-4 evaluates whether the proposed project would result in inadequate emergency access. Although on-street parking on Wixford Way occurs under existing conditions, the potential for additional event-related parking to affect emergency access must also be considered. To address project-related parking and circulation effects, Mitigation Measure 4.4-3b requires the District to prepare and implement an Event Transportation Management Plan before the first event anticipated to require off-site parking. The plan must identify designated legal parking locations, direct attendees to appropriate parking areas, provide event staffing and signage, and prevent event-related parking and vehicle queues from obstructing public travel lanes, driveways, fire lanes, and emergency-access routes. The measure also requires the District to evaluate the plan's effectiveness following the first highly attended nighttime event and revise it as necessary to address observed circulation and emergency-access conditions. With implementation of Mitigation Measures 4.4-3a and 4.4-3b, the Draft EIR concludes that project-related emergency-access impacts would be less than significant. Please also see Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

Comment I18-10 Response: Draft EIR Section 4.3, "Noise and Vibration," includes ambient noise measurements collected at multiple locations in the project vicinity, including residential areas near the stadium. The analysis also includes measurements taken during evening athletic activities at Rio Americano High School and reference measurements from a high-attendance football game hosted at El Camino High School. The monitoring locations and results are provided in Draft EIR Section 4.3 and Appendix D.

The reference measurements are used to characterize noise generated by stadium events, while the project-specific analysis considers the locations of surrounding sensitive receptors and anticipated noise exposure. Draft EIR Section 4.2 separately evaluates potential effects of operational noise on wildlife within the adjacent American River Parkway. The Draft EIR identifies significant and unavoidable operational stadium noise impacts after mitigation. Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife and Master Response 4: Mitigation.

Comment I18-11 Response: Draft EIR Section 4.1, "Aesthetics," identifies the portion of the American River Parkway south of the flood control levee as Lighting Zone LZ-0 for purposes of evaluating nighttime lighting impacts. As explained in Response to Comment O4-35, Draft EIR Section 4.2, "Biological Resources," evaluates potential impacts based on existing habitat conditions and species with potential to occur, regardless of jurisdictional boundaries. The analysis considers both the levee and adjacent Parkway habitat and does not exclude potential effects on

biological resources based on whether the levee is considered part of the Parkway.

Please see Response to Comment O4-35 and Master Response 10: Accurate, Stable, and Finite Project Description for additional discussion of the levee and Parkway boundaries. Please also see Response to Comment O4-36 regarding the lighting-zone classifications and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife regarding potential lighting effects on wildlife.

Comment I18-12 Response: Final formatting somehow created a technical formatting error in presentation of this figure in the LTA and Draft EIR. However, the figure was prepared and utilized correctly for the purposes of analysis and technical analysts were well informed on the project site location, driveways, and surrounding roadways, so no revisions to the Draft EIR are required as result of this formatting error. Nonetheless, to present an accurate figure, this figure has been updated and provided in Chapter 3, "Errata," to this Final EIR.

Comment I18-13 Response: The commenter is incorrect in stating that the Rio versus Jesuit game was played on August 28, 2025. The Draft EIR is accurate in identifying the game and date of data collection as August 29, 2025. This game was a Friday, which aligns with the 2025 calendar, and the data also aligns with the published game schedule. No changes to the Draft EIR are required.

Comment I18-14 Response: Draft EIR Section 4.1, "Aesthetics," evaluates potential changes to the visual character of the project vicinity, including views from the American River Parkway. The analysis includes representative key observation points, visual simulations, and consideration of existing vegetation and the visibility of proposed improvements. The visual impact analysis is based on multiple viewpoints and the anticipated appearance of the project under existing and proposed conditions. Please see Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors for additional discussion of the lighting analysis and project-specific photometric study.

Comment I18-15 Response: Draft EIR Chapter 3, "Project Description," identifies graduation ceremonies among the events that could be accommodated at the improved stadium. Draft EIR Table 3-1 anticipates one graduation ceremony annually, with an estimated attendance of approximately 3,500 people. As clarified in Master Response 10: Accurate, Stable, and Finite Project Description, the lower attendance figure described in the text of Draft EIR Section 3.2 is inconsistent with Table 3-1. While graduation was originally considered in the development of the proposed project operating scenario to accommodate 3,500 attendees, further discussion and reflection upon available bleacher and field seating resulted in a slight refinement of this maximum event capacity to 3,400; this aligns with the maximum football game attendance scenario and the basis of analysis applied throughout the Draft EIR, including for Transportation, as well as the is within the capacity of the fire and life-safety requirements for design review and approval by DSA. Master Response 10 confirms that 3,400 attendees is the intended estimate and identifies a corresponding correction to Table 3-1 and to Mitigation Measure 4.4-3c to implement this limit, as also reflected in Chapter 3, "Errata," to this Final EIR.

Seating logistics, standing-room management, and the cost of temporary seating are economic/operational issues; CEQA does not treat these as significant environmental effects unless they translate into a physical change (§15131(a)). By contrast, physical effects from graduation events—such as traffic, parking demand, temporary noise levels from amplified sound and crowd noise, lighting, and short-term air emissions from vehicle trips—are within CEQA's scope and are analyzed accordingly throughout the Draft EIR. The Draft EIR evaluates special-event conditions (including graduation) using a reasonable worst-case attendance scenario to ensure that analyses reflect peak conditions supported by substantial evidence (Guidelines §§15064, 15126.6). The specific seating arrangements, occupancy limits, and measures necessary to accommodate attendees safely, including during periods of high temperatures or adverse weather, would be addressed through the District's event planning and applicable facility safety requirements. Please see Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

Comment I18-16 Response: Draft EIR Chapter 3, "Project Description," identifies the proposed stadium improvements, including the increase in permanent bleacher seating capacity. Draft EIR Table 3-1 identifies the anticipated types, frequency, and attendance of stadium events used in evaluating the proposed project's environmental impacts. These attendance estimates establish the assumptions used for environmental analysis and are not intended to establish the maximum occupant load permitted under applicable building and fire safety requirements.

Draft EIR Section 4.4, "Transportation and Circulation," evaluates potential safety impacts associated with increased event attendance, including emergency access under Impact 4.4-4. Draft EIR Section 5.7, "Hazards and Hazardous Materials," also evaluates potential interference with emergency response and evacuation. The proposed improvements would be subject to applicable design, occupancy, and fire and life-safety requirements before implementation. Please see Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation for additional discussion of applicable safety review requirements and stadium event management.

Comment I18-17 Response: Draft EIR Chapter 3, "Project Description," identifies the existing and anticipated uses of Raider Stadium, including athletic competitions, graduation ceremonies, school assemblies, and school-sanctioned community events. Table 3-1 identifies the anticipated frequency and attendance of these activities, which inform the environmental analyses. The proposed project would improve existing athletic facilities but would not involve construction of additional athletic fields or a change in the school's educational use. As discussed in Response to Comment O4-11, Education Code Section 38131 provides for community use of public school facilities, and the District's Use of School Facilities Handbook establishes procedures governing authorized use of District facilities, including Raider Stadium. Such uses would remain subject to applicable District policies and facility-use requirements. Draft EIR Section 5.12, "Public Services," identifies the Sacramento Metropolitan Fire District as the existing fire protection and emergency medical service provider. Draft EIR Impact 4.4-4 evaluates potential impacts on emergency access, and Mitigation Measures 4.4-3a and 4.4-3b establish measures to manage event-related parking and circulation to maintain access for emergency responders. Please see Master Response 10:

Operations Management, Including Traffic Management and Emergency Evacuation.

Comment I18-18 Response: Draft EIR Chapter 3, "Project Description" (pages 3-1 through 3-12), provides the location, existing conditions, proposed improvements, and anticipated operational characteristics of the project. Section 3.2.1, "Project Components," describes the proposed high-mast lighting standards, expanded bleacher seating, upgraded public address system, press box, and pedestrian safety lighting. The Draft EIR includes exhibits identifying the project site and surrounding land uses, while Appendix B provides project-specific lighting design information and photometric modeling used to evaluate potential lighting impacts.

CEQA Guidelines Section 15124 requires an EIR to provide a general description of a project's technical, economic, and environmental characteristics sufficient to support informed environmental review. Completion of all construction-level engineering drawings is not required before circulation of a Draft EIR, provided the project is described with sufficient detail to evaluate its reasonably foreseeable environmental effects. The proposed improvements are also subject to the applicable Division of the State Architect design review process, which is separate from the District's environmental review under CEQA. Please see Master Response 10: Accurate, Stable, and Finite Project Description for additional discussion of the project description and the information used to evaluate environmental impacts.

Comment I18-19 Response: Draft EIR Section 4.1, "Aesthetics," describes the existing mature eucalyptus trees along the southern boundary of Rio Americano High School and considers their role in screening views of the proposed stadium improvements from the American River Parkway. The presence and screening function of these trees are also documented in the Bat Survey Memo (Draft EIR Appendix C), which describes field surveys conducted in July and August 2025. Draft EIR Key Observation Point (KOP) 7 (page 4.1-8) depicts the existing vegetation and elevated levee as viewed from the Jedediah Smith Memorial Trail. The proposed project would not require removal of these trees.

The Draft EIR does not assume that the existing tree canopy would completely obstruct views of the proposed 80-foot light standards. As discussed on page 4.1-17, portions of the light poles and luminaires would be intermittently visible through the trees from the Parkway and levee crown road. Draft EIR Visual Simulations 2a and 2b (pages 4.1-21 and 4.1-22) further illustrate anticipated dusk and nighttime views of the proposed improvements from the Jedediah Smith Memorial Trail, including the intervening vegetation and visible portions of the lighting standards. The analysis considers these visual changes in relation to the existing developed campus, surrounding vegetation, levee, and Parkway landscape and concludes that the proposed improvements would not substantially degrade the visual character or quality of public views.

Although the Draft EIR does not provide a separate quantitative tree height or canopy inventory, the existing vegetation is documented through photographs and biological field observations. The separate 90-foot cell tower identified by the commenter is not part of the proposed stadium improvements; it is identified

as an approved related project in Draft EIR Table 7-1. Please see Master Response 9: Cumulative Impacts for additional discussion of the cell tower.

Comment I18-20 Response: Draft EIR Section 4.1, "Aesthetics," identifies representative key observation points (KOPs) used to characterize existing visual conditions surrounding Rio Americano High School. Exhibit 4.1-1 identifies the locations of these viewpoints. KOP-7 (page 4.1-8) depicts the existing view looking north toward the campus from the Jedediah Smith Memorial Trail and identifies Google Earth (2016) as the source of the photograph. The photograph shows the existing vegetation along the southern campus boundary and the elevated American River levee.

Draft EIR Section 4.1 (pages 4.1-20 through 4.1-22) also presents visual simulations prepared by Musco Lighting in 2026. Visual Simulations 2a and 2b depict anticipated dusk and nighttime conditions from the Jedediah Smith Memorial Trail, including the proposed stadium lighting and intervening vegetation. These simulations supplement the existing-condition photographs and are considered in the evaluation of potential visual impacts.

The Draft EIR does not separately identify the camera elevation, photograph date, or vegetation measurements used to prepare each simulation. However, the visual analysis acknowledges that the existing trees provide only partial screening and that portions of the proposed light poles and luminaires would remain visible through the vegetation from certain viewpoints. Please see Response to Comment I18-19 for additional discussion of the existing tree canopy and its role in the visual analysis.

Comment I18-21 Response: As discussed in Response to Comment I18-19, Draft EIR Section 4.1, "Aesthetics," identifies the mature trees along the southern campus boundary and evaluates their role in screening views of Raider Stadium from the American River Parkway. The existing vegetation is documented in KOP-7 (page 4.1-8) and the Bat Survey Memo (Draft EIR Appendix C), which includes field observations conducted in July and August 2025.

Although the Draft EIR does not provide measured tree heights or canopy dimensions, its visual impact analysis does not assume that the proposed 80-foot light standards would be completely concealed by existing vegetation. Draft EIR Section 4.1 (page 4.1-17) acknowledges that portions of the light poles and luminaires would be intermittently visible through the trees from the Parkway and levee crown road. Visual Simulations 2a and 2b (pages 4.1-21 through 4.1-22) illustrate anticipated dusk and nighttime views from the Jedediah Smith Memorial Trail. The analysis considers the visibility of the proposed improvements in the context of the existing campus development, intervening vegetation, and surrounding landscape and concludes that the resulting visual changes would not substantially degrade the visual character or quality of public views. The separate 90-foot cell tower referenced by the commenter is not part of the proposed stadium improvements. The tower is identified as an approved related project in Draft EIR Table 7-1 and is considered in the cumulative impact analysis in Chapter 7. Please see Master Response 9: Cumulative Impacts for additional discussion of the cell tower.

Comment I18-22 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled and Master Response 10: Accurate, Stable, and Finite Project Description for discussion of the historical attendance data, projected event attendance, and assumptions used in the environmental analyses.

Comment I18-23 Response: Please see Master Response 5: Trip Generation and Vehicle Miles Traveled and Master Response 6: Parking Availability for discussion of the historical ticket sales and attendance records, including complimentary and will-call admissions, and the development of the projected attendance scenarios used in the transportation analysis.

Comment I18-24 Response: Draft EIR Table 3-1 identifies the types, frequency, and anticipated attendance of stadium events under the proposed project, including athletic competitions, graduation ceremonies, school assemblies, and school-sanctioned community events. These assumptions inform the environmental analyses presented throughout the Draft EIR.

As discussed in Master Response 5: Trip Generation and Vehicle Miles Traveled, the transportation analyses use historical attendance data and evaluate both general and higher-attendance event scenarios. Draft EIR Section 4.4, "Transportation and Circulation," evaluates the potential transportation and parking-related safety impacts of stadium operations. Response to Comment O4-11 also discusses the assumptions used to evaluate non-athletic events, including school assemblies and potential community events. Please see Master Response 5: Trip Generation and Vehicle Miles Traveled; Master Response 6: Parking Availability; and Master Response 10: Accurate, Stable, and Finite Project Description for additional discussion of the attendance assumptions and range of anticipated stadium activities.

Comment I18-25 Response: The commenter questions whether the District consistently implements and enforces its existing facilities-use permit requirements and whether alleged noncompliance affects the Draft EIR's evaluation of existing conditions. As discussed in Response to Comment O4-11, the District's Use of School Facilities Handbook (revised 2023) establishes the procedures for authorizing community use of school facilities, including Raider Stadium. The Draft EIR evaluates existing stadium activities and the reasonably foreseeable changes in use associated with the proposed improvements, rather than assessing compliance with individual facilities-use permits. Its environmental conclusions are based on the operational assumptions described in Chapter 3 and the potential physical effects of the proposed project. Please see Response to Comment O4-11 and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

Comment I18-26 Response: The commenter's observations and photographs concerning weekend soccer activities, private landscaping work, and other activities at Rio Americano High School are acknowledged. These concerns relate to the administration and enforcement of existing facilities-use requirements. The proposed project does not authorize the specific activities identified by the commenter or modify the District's existing permit process. The Draft EIR evaluates the anticipated changes in stadium operations and associated environmental effects resulting from the proposed improvements. Please see Response to Comment O4-11

regarding the District's facilities-use policies and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

Comment I18-27 Response: The commenter requests that the District's facilities-use policies, permit approval procedures, complaint-response processes, and enforcement requirements be disclosed and incorporated into project mitigation. As discussed in Response to Comment O4-11, the District's Use of School Facilities Handbook establishes requirements governing authorized community use of school facilities. The Draft EIR separately establishes mitigation measures to address identified environmental impacts associated with stadium operations, including operational noise controls under Mitigation Measure 4.3-1b and event-related parking and circulation requirements under Mitigation Measures 4.4-3a through 4.4-3c. These requirements would be enforceable through the Mitigation Monitoring and Reporting Program. Please see Master Response 4: Mitigation and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

Comment I18-28 Response: The commenter requests enforceable limits on stadium operations, including event scheduling, lighting, amplified sound, and attendance, as well as monitoring and complaint-response procedures. Draft EIR Sections 3.2.2 and 3.2.3 identify the anticipated operating conditions and event schedule used in the environmental analyses. These estimates describe the activities evaluated in the Draft EIR and do not themselves establish separate maximum attendance or annual event limits. The Draft EIR does establish specific operational controls through mitigation, including restrictions on amplified sound and band activity after 10:00 p.m. under Mitigation Measure 4.3-1b and requirements for event-related parking and circulation management under Mitigation Measures 4.4-3a through 4.4-3c. Compliance with adopted mitigation would be addressed through the Mitigation Monitoring and Reporting Program. The additional attendance limits, independent monitoring, and event-related complaint-response procedures requested by the commenter are not separately established as mitigation measures. Please see Master Response 4: Mitigation; Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation; and Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I18-29 Response: The Draft EIR specifically evaluates the upward-directed ball-tracking fixtures as part of the proposed stadium lighting system. Draft EIR Section 4.2, “Biological Resources” (pages 4.2-18 through 4.2-19), considers their potential contribution to glare, skyglow, and effects on migratory birds. As explained in Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife, the fixtures' limited, intermittent use would contribute minimally to glare and skyglow. Regarding the commenter's request to remove the ball trackers, Response to Comment O2-22 explains that eliminating them could require the primary field lights to be directed higher, potentially increasing light spill and skyglow, or could reduce visibility of high-flying footballs and create player-safety concerns. Therefore, removal of the fixtures was not identified as necessary to reduce a significant environmental impact. Please see Master Response 2 and Response to Comment O2-22.

Comment I18-30 Response: The Ralph Richardson Center Modernization Project was included in Draft EIR Table 7-1 because it is a nearby project with the potential to contribute to environmental effects considered in the cumulative analysis. A related project does not need to involve the same type of development as the proposed stadium improvements to warrant consideration under CEQA. Regarding the U.S. Army Corps of Engineers' Contract 3B, Master Response 9: Cumulative Impacts explains the District's determination that the project's implementation remains uncertain because of ongoing litigation and an injunction. The Master Response also considers potential overlapping construction-related transportation effects and explains that the anticipated construction access routes would differ from those used for the proposed stadium improvements. Master Response 9 further addresses the potential for overlapping stadium events at Jesuit High School and the uncertainties surrounding the school's planned enrollment changes. Please see Master Response 9: Cumulative Impacts for supporting discussion and the District's cumulative impact determinations.

Comment I18-31 Response: The commenter's correction regarding the distance between Rio Americano High School and El Camino High School is acknowledged. Draft EIR Chapter 6, "Alternatives," describes El Camino High School as approximately three miles north of Rio Americano High School. This is an approximate geographic description rather than the distance applied uniformly in the transportation analysis. The Vehicle Miles Traveled Analysis (Draft EIR Appendix F) uses GIS-based travel distances calculated between attendee origins and event locations. Kimley-Horn's August 25, 2026 VMT analysis identifies an approximately 2.7-mile modeled driving distance between the two school campuses. This distance exceeds the 2.24-mile figure identified by the commenter and therefore represents a conservative estimate of the driving distance between the campuses. The Draft EIR's rounded three-mile description was not used as a uniform trip-distance assumption in the VMT calculations. Please see Master Response 5: Trip Generation and Vehicle Miles Traveled for additional discussion of the transportation analysis methodology.

Comment I18-32 Response: Draft EIR Chapter 6 evaluates Alternative 2: Reconfigure Stadium and Athletic Fields concludes that relocating the stadium to the northeastern portion of the campus would result in the same or greater impacts across the evaluated resource areas, including additional construction-related impacts. Therefore, although Alternative 2 would achieve the project objectives, it would not substantially reduce the project's significant environmental impacts. Master Response 8: Alternatives also explains why reduced-capacity, limited nighttime operations, alternative-location, and continued off-site facility-use options were not selected for detailed evaluation. The District determined that these alternatives would not achieve most of the project's basic objectives or meaningfully reduce its significant noise impacts. The proposed nature and outdoor science education alternative would not achieve most of the objectives associated with improving athletic facilities and accommodating school events. The No Project Alternative was evaluated and identified as environmentally superior. Please see Master Response 8: Alternatives for the District's feasibility determinations.

Comment I18-32 Response: The specificity, enforceability, and monitoring of mitigation measures are addressed in Master Response 4: Mitigation, which identifies the implementation

responsibilities, performance standards, and monitoring requirements associated with the Draft EIR's mitigation measures. The Draft EIR also acknowledges that construction and operational noise impacts would remain significant and unavoidable after implementation of feasible mitigation. Regarding the requested prohibition on all future portable lighting throughout the Rio Americano High School campus, the proposed permanent lighting system is intended to replace the portable diesel-powered lights currently used for certain activities at Raider Stadium. A prohibition extending to all future portable lighting elsewhere on campus is beyond the proposed stadium improvements and was not identified as necessary mitigation for a significant project-related environmental impact. Therefore, the Draft EIR does not propose the requested campus-wide prohibition. Please see Master Response 4: Mitigation and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

COMMENT LETTER I19, MS. SHAWN DUNCAN, SEPTEMBER 26, 2026

Response to Comment Letter I19, Ms. Shawn Duncan

Comment I19-1 Response: Please see response to comment I1-1.

Comment I19-2 Response: Please see response to comment I1-2.

Comment I19-3 Response: Please see response to comment I1-3.

Comment I19-4 Response: Please see response to comment I1-4.

Comment I19-5 Response: Please see response to comment I1-5.

Comment I19-6 Response: Please see response to comment I1-6.

Comment I19-7 Response: Please see response to comment I1-7.

Comment I19-8 Response: Please see response to comment I1-8.

Comment I19-9 Response: Please see response to comment I1-9.

Comment I19-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I19-11 Response: Please see response to comment I1-12.

Comment I19-12 Response: Please see response to comment I1-13.

Comment I19-13 Response: Please see response to comment I1-14.

Comment I19-14 Response: Please see response to comment I1-15.

COMMENT LETTER I20. TEEANN DUNCAN; OCTOBER 14, 2026

Response to Comment Letter I20. Teeann Duncan

Comment I20-1 Response: Please see response to comment I1-1.

Comment I20-2 Response: Please see response to comment I1-2.

Comment I20-3 Response: Please see response to comment I1-3.

Comment I20-4 Response: Please see response to comment I1-4.

Comment I20-5 Response: Please see response to comment I1-5.

Comment I20-6 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I20-7 Response: Please see response to comment I1-9.

Comment I20-8 Response: Please see response to comment I1-10 and I1-11.

Comment I20-9 Response: Please see response to comment I1-12.

Comment I20-10 Response: Please see response to comment I1-13.

Comment I20-11 Response: Please see response to comment I1-14.

Comment I20-12 Response: Please see response to comment I1-15.

COMMENT LETTER I21. KIMBERLY ERICKSON; OCTOBER 16, 2026

Response to Comment Letter I21. Kimberly Erickson

Comment I21-1 Response: Please see response to comment I1-1.

Comment I21-2 Response: Please see response to comment I1-2.

Comment I21-3 Response: Please see response to comment I1-3.

Comment I21-4 Response: Please see response to comment I1-4.

Comment I21-5 Response: Please see response to comment I1-5.

Comment I21-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I21-7 Response: Please see response to comment I1-8.

Comment I21-8 Response: Please see response to comment I1-9.

Comment I21-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I21-10 Response: The commenter's request to discontinue existing use of the portable diesel-powered lights at Raider Stadium is noted. Please see also response to comment I1-12.

Comment I21-11 Response: Please see response to comment I1-13.

Comment I21-12 Response: Please see response to comment I1-14.

Comment I21-13 Response: Valley Fever is endemic to the San Joaquin Valley, not the Sacramento Valley; thus, there would be no impact from the proposed project. With regards to the times when lights would be turned off at the stadium, please see Draft EIR Chapter 3, "Project Description," (page 3-7). No mitigation measures are required.

Comment I21-14 Response: The proposed project would not result in any change in the use of herbicides to control weeds or fertilizers as compared to existing conditions at the Rio Americano High School campus because the project does not include modifications to existing athletic fields or landscaping. Thus, there would be no impact.

Comment I21-15 Response: As discussed in detail in Draft EIR Section 4.4, "Transportation and Traffic," on Draft EIR pages 4.4-10 and 4.4-11, VMT would be substantially reduced by implementing the proposed project because the average trip distance (for home attendees, aka Rio Americano High School students, coaches, and parents) would decrease as compared to trips to El Camino High School under existing conditions, and the trip rates, even with an increase in attendance, would also decrease, as detailed in Draft EIR Appendix E. Please see also response to comment I1-15

Comment I21-16 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the commenter's opposition to the project is noted.

COMMENT LETTER I22. SCOTT ERICKSON; OCTOBER 16, 2026

Response to Comment Letter I22. Scott Erickson

Comment I22-1 Response: Please see response to comment I1-1.

Comment I22-2 Response: Please see response to comment I1-2.

Comment I22-3 Response: Please see response to comment I1-3.

Comment I22-4 Response: Please see response to comment I1-4.

Comment I22-5 Response: Please see response to comment I1-5.

Comment I22-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I22-7 Response: Please see response to comment I1-8.

Comment I22-8 Response: Please see response to comment I1-9.

Comment I22-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I22-10 Response: Please see response to comment I1-12.

Comment I22-11 Response: Please see response to comment I1-13.

Comment I22-12 Response: Please see response to comment I1-14.

Comment I22-13 Response: Please see response to comment I1-15.

COMMENT LETTER I23. GRAHAM EVERETT; OCTOBER 14, 2026

Response to Comment Letter I23. Graham Everett

Comment I23-1 Response: Please see response to comment I1-1.

Comment I23-2 Response: Please see response to comment I1-2.

Comment I23-3 Response: Please see response to comment I1-3.

Comment I23-4 Response: Please see response to comment I1-4.

Comment I23-5 Response: Please see response to comment I1-5.

Comment I23-6 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I23-7 Response: Please see responses to comments I1-9 through I1-12.

Comment 123-8 Response: Please see response to comment I1-13.

Comment I23-9 Response: Please see response to comment I1-14.

Comment I23-10 Response: Please see response to comment I1-15.

COMMENT LETTER I24. ELISE FANDRICH; OCTOBER 14, 2026

Response to Comment Letter I24. Elise Fandrich

Comment I24-1 Response: Please see response to comment I1-1.

Comment I24-2 Response: Please see response to comment I1-2.

Comment I24-3 Response: Please see response to comment I1-3.

Comment I24-4 Response: Please see response to comment I1-4.

Comment I24-5 Response: Please see response to comment I1-5.

Comment I24-6 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I24-7 Response: Please see response to comment I1-9.

Comment I24-8 Response: Please see responses to comments I1-10 and I1-11.

Comment I24-9 Response: Please see response to comment I1-12.

Comment I24-10 Response: Please see response to comment I1-13.

Comment I24-11 Response: Please see response to comment I1-14.

Comment I24-12 Response: Please see response to comment I1-15.

COMMENT LETTER I25, ANNETTE FAUROTE, SEPTEMBER 26, 2026

Response to Comment Letter I25, Annette Faurote

Comment I25-1 Response: Please see response to comment I1-1.

Comment I25-2 Response: Please see response to comment I1-2.

Comment I25-3 Response: Please see response to comment I1-3.

Comment I25-4 Response: Please see response to comment I1-4.

Comment I25-5 Response: Please see response to comment I1-5.

Comment I25-6 Response: Please see response to comment I1-6.

Comment I25-7 Response: Please see response to comment I1-7.

Comment I25-8 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I25-8 Response: Please see response to comment I1-8.

Comment I25-9 Response: Please see response to comment I1-9.

Comment I25-10 Response: Please see response to comment I1-10.

Comment I25-11 Response: Please see response to comment I1-11.

Comment I25-12 Response: Please see response to comment I1-12.

Comment I25-13 Response: Please see response to comment I1-13.

Comment I25-14 Response: Please see response to comment I1-14.

Comment I25-15 Response: Please see response to comment I1-15.

COMMENT LETTER I26, ALEXIS FIRSTY, OCTOBER 5, 2026

Response to Comment Letter I26, Alexis Firsty

Comment I26-1 Response: This comment letter (I26), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I26-2 through I26-10.

Comment I26-2 Response: Please see response to comment I1-1.

Comment I26-3 Response: Please see response to comment I1-2.

Comment I26-4 Response: Please see response to comment I1-4.

Comment I26-5 Response: Please see response to comment I1-2.

Comment I26-6 Response: Please see responses to comments I1-1 and I1-2.

Comment I26-7 Response: Please see response to comment I1-5.

Comment I26-8 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the commenter's opposition to the project is noted.

Comment I26-9 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I26-10 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER I27, MARNI FYLLING-ELLISON, SEPTEMBER 30, 2026

Response to Comment Letter I27, Marni Fylling-Ellison

Comment I27-1 Response: The information regarding the commenter's personal background is noted. Draft EIR Sections 4.1 through 4.5 include feasible mitigation measures, where necessary, to reduce the project's potentially significant and significant physical environmental impacts to a less-than-significant level. Potential effects to the American River Parkway from implementing the proposed project are evaluated in Draft EIR Section 4.1, "Aesthetics," Section 4.2, "Biological Resources," Section 4.3, "Noise and Vibration," Section 5.9, "Land Use and Planning," and Section 5.13, "Recreation." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources.

Comment I27-2 Response: The District notes that the Rio Americano High School campus already has an existing stadium: Raider Stadium. The purpose of the proposed project is to provide permanent nighttime lighting for on-campus high school sporting events. The commenter's opposition to the project is noted.

Comment I27-3 Response: 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. With regards to consistency with the Wild and Scenic River designation, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. The commenter's opinion that the Rio Americano High School campus should be used for recreation and science projects is noted.

Comment I27-4 Response: Please see responses to comments I1-1 and I1-2. Furthermore, as explained in detail in Draft EIR Section 5.2, "Biological Resources," Impacts 4.2-1 through 4.2-6 (pages 4.2-15 through 4.2-27), the proposed project would not result in the loss of any habitat or ecosystems.

Comment I27-5 Response: The District notes that the Rio Americano High School campus already includes an existing sports/event stadium: Raider Stadium. The purpose of the proposed project is to provide permanent nighttime lighting for on-campus high school sporting events. Please see response to comment I27-4. For the reasons described in detail in Draft EIR Section 4.4, "Transportation and Traffic," the impacts related to potential conflicts with existing transportation circulation plans and the impacts related to VMT would be less than significant (Impact 4.4-1 and 4.4-2, pages 4.4-8 through 4.4-11). The Draft EIR includes feasible mitigation measures to reduce the project's potentially significant impacts related to event-related pedestrian and bicycle circulation, and event-related vehicle queuing, to a less-than-significant level (Draft EIR pages 4.4-13 through 4.4-16).

Comment I27-6 Response: The purpose of environmental documents prepared under CEQA is to evaluate the potential *physical* environmental impacts of a project. As stated in the CEQA Guidelines Section 15131(a), "Economic or social effects of a project shall not be treated as significant effects on the environment… The focus of the analysis shall be on the physical changes." No changes to the Draft EIR are required.

Comment I27-7 Response: All of the potential physical environmental impacts that could occur from implementing the proposed project are evaluated in the Draft EIR. Cumulative impacts are evaluated in Draft EIR Section 7.1 (pages 7-1 through 7-13), and as discussed in detail therein, no cumulative adverse impacts to the Parkway would occur. The District has considered all public comments that have been submitted on the NOP and the Draft EIR, and all such comments are included in the project's administrative record.

Comment I27-8 Response: The Draft EIR contains a thorough analysis of the project's potential environmental impacts, and feasible mitigation measures are included, where necessary, to reduce the project's potentially significant and significant.

COMMENT LETTER I28. ERIK GABELE; OCTOBER 16, 2026

Response to Comment Letter I28. Erik Gabele

Comment I28-1 Response: Responses to individual comments are provided in I28-2 through I28-12.

Comment I28-2 Response: The Draft EIR evaluates the potential environmental impacts associated with project-related noise and lighting in Section 4.3, "Noise and Vibration," and Section 4.1, "Aesthetics," respectively. Impacts associated with biological resources are evaluated in Draft EIR Section 4.2, "Biological Resources," and impacts associated with recreation are evaluated in Draft EIR Section 5.13, "Recreation." Operational noise effects are evaluated in Impact 4.3-1 (pages 4.3-18 through 4.3-27) and Impact 4.3-2 (page 4.3-27), and operational impacts related to recreation, including event impacts on the American River Parkway, are evaluated in Impact 5.13-2 (pages 5.13-33 and 5.13-34). No significant impacts on the American River Parkway were identified in the Draft EIR from project-related noise, lighting, traffic, or recreation. No changes to the Draft EIR are required.

Comment I28-3 Response: Operational impacts related to recreation, including traffic and event impacts on the American River Parkway, are evaluated in Impact 5.13-2 (pages 5.13-33 and 5.13-34). No changes to the Draft EIR are required.

Comment I28-4 Response: As explained in Draft EIR Section 7.4, "Significant and Unavoidable Adverse Impacts," generation of a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards, including operational stadium event noise, would remain significant and unavoidable even after implementation of all feasible mitigation measures. With regards to property values, the purpose of environmental documents prepared under CEQA is to evaluate the potential physical environmental impacts of a project. As stated in CEQA Guidelines Section 15131(a), economic or social effects of a project shall not be treated as significant effects on the environment; the focus of the analysis is on physical changes. Property values involve a perceived economic impact that is not recognized as an environmental impact under CEQA. (*Porterville Citizens for Responsible Hillside Development v. City of Porterville* (2007) 157 Cal.App.4th 885, 903.) No changes to the Draft EIR are required.

Comment I28-5 Response: Operational impacts on wildlife, including lighting, noise, and people, along with other biological resources are evaluated in Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27). No changes to the Draft EIR are required.

Comment I28-6 Response: Operational noise effects are evaluated in Impact 4.3-1 (pages 4.3-18 through 4.3-27) and Impact 4.3-2 (page 4.3-27). Operational impacts related to recreation, including traffic and event impacts on the American River Parkway, are evaluated in Impact 5.13-2 (pages 5.13-33 and 5.13-34). No changes to the Draft EIR are required.

Comment I28-7 Response: The methodology and details regarding the existing and projected schedule of uses at Raider Stadium are described in Draft EIR Section 3.2.3, "Schedule of

Uses," on pages 3-6 through 3-8. The commenter has not cited any case, statute, regulation, or other authority that would require the District to place a finite limit on the number of events to be held each year were the project to be completed. Measures to reduce noise from project operation related to stadium use are contained in Draft EIR Mitigation Measure 4.3-1b (Draft EIR pages 4.3-25 and 4.3-26). Please see also Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment I28-8 Response: The information related to existing and projected attendance at school events at Raider Stadium is presented in Draft EIR Table 3-1, and the methodology and details regarding the data presented in Table 3-1 are described in Draft EIR Section 3.2.3, "Schedule of Uses," on pages 3-6 through 3-8. Please see also Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation, regarding night-event management standards, including facility-use rules and public-address system limitations. No changes to the Draft EIR are required.

Comment I28-9 Response: The Draft EIR evaluates both a projected average attendance and a projected maximum attendance scenario and quantifies the potential impacts related to noise, traffic, and parking. The commenter has not cited any case, statute, regulation, or other authority that would require the District to place a finite limit on the number of events to be held each year were the project to be completed.

Comment I28-10 Response: Draft EIR Table 3-1 (page 3-9) identifies the anticipated schedule of uses at Raider Stadium, including anticipated events and attendance, including the types of events, anticipated attendance, and estimated frequency of use. The commenter's request that neighboring residents be provided with a schedule identifying events that will use amplified sound and/or are expected to have high attendance is noted. No changes to the Draft EIR are required.

Comment I28-11 Response: Draft EIR Mitigation Measure 4.3-1b requires implementation of stadium event noise controls to reduce off-site noise exposure from crowd activity, bleacher activity, band activity, artificial noisemakers, and public address/amplified sound. These measures include limits on public-address system operation, sound testing and performance standards, and event scheduling and use restrictions. The commenter's request that the District identify a neighborhood/Parkway liaison who would be available by telephone during events involving amplified sound or high attendance to receive complaints from nearby residents is noted. Please see also response to Comment O4B-112 with regard to a complaint notification and response system and edit to a statement within the Draft EIR due to the infeasibility of such being implemented effectively.

Comment I28-12 Response: Although the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element, the Draft EIR uses the County standards as applicable metrics for evaluating potential noise impacts on nearby sensitive receptors. Please see Draft EIR Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls. The commenter's requests for additional sound-level monitoring during high-attendance events, measurements within the American River Parkway, public reporting of monitoring results, and incorporation of these requirements into a

memorandum of agreement with surrounding neighbors are noted. No changes to the Draft EIR are required.

COMMENT LETTER I29. JULIE GABELE; OCTOBER 6, 2026

Response to Comment Letter I29. Julie Gabele

Comment Response I29: Thank you for bringing this issue to our attention. We have determined that your letter was inadvertently omitted from the compilation in the Draft EIR of comments received on the District's Notice of Preparation. We have reviewed your comments and have determined that all of the issues raised in your letter were addressed in the Draft EIR, because those issues were also raised by other commenters. Your comments have be included in the Final EIR in Chapter 3, "Errata," to the Final EIR. along with any other minor revisions and corrections that will be made to the Draft EIR. As such, they will also be included in the administrative record for the project.

COMMENT LETTER I30. JULIE GABELE; OCTOBER 15, 2026 RESPONSE TO

Response to Comment Letter I30. Julie Gabele

Comment Response I29: Thank you for bringing this issue to our attention. We have determined that your letter was inadvertently omitted from the compilation in the Draft EIR of comments received on the District's Notice of Preparation. We have reviewed your comments and have determined that all of the issues raised in your letter were addressed in the Draft EIR, because those issues were also raised by other commenters. Your comments have be included in the Final EIR in Chapter 3, "Errata," to the Final EIR. , along with any other minor revisions and corrections that will be made to the Draft EIR. As such, they will also be included in the administrative record for the stadium improvements project at RAHS.

COMMENT LETTER I31. JULIE GABELE; OCTOBER 16, 2026

Response to Comment Letter I31. Julie Gabele

Comment I31-1 Response: The Draft EIR provides a complete, accurate, transparent, and evidence-based assessment of the project's potential physical impacts on the environment. Please see also response to comment I1-1. No changes to the Draft EIR are necessary, and recirculation is not required.

Comment I31-2 Response: Draft EIR Section 5.13, "Recreation," includes an analysis of whether the proposed project would 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 (Impact 5.13-1, page 5.13-33), and an analysis of whether the proposed project would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment (Impact 5.13-2, pages 5.13-33 and 5.13-34), as required by the State CEQA Guidelines Appendix G. For the reasons explained therein, the Draft EIR correctly concludes that impacts related to recreation would be less than significant. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I31-3 Response: Because the commenter has not provided any specific details, the District cannot respond with specificity other than to state that the Draft EIR appropriately evaluates the project as a whole, including its permanent physical features, intended operational capacity and use, frequency and duration of use, proposed activities, and interactions with other present and reasonably foreseeable cumulative projects. No changes to the Draft EIR are required.

Comment I31-4 Response: The Draft EIR is not focused only on construction, the Draft EIR fully and thoroughly evaluates operation-related physical impacts on the environment from the proposed project in all topic areas; please see also responses to comments I1-1 and I1-13, and response to comment I31-3. No changes to the Draft EIR are required.

Comment I31-5 Response: Please see response to comment I31-3. No changes to the Draft EIR are required.

Comment I31-6 Response: Please see response to comment I1-1. No changes to the Draft EIR are required.

Comment I31-7 Response: The Draft EIR contains a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13). With regards to the District's Facilities Master Plan: at the present time, the District has no plans to make additional improvements at the Rio Americano High School campus. If and when the District were to decide to make any additional future improvements at Rio Americano High School, the District would prepare the appropriate environmental document as required by CEQA. No changes to the Draft EIR are required.

Comment I31-8 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I31-9 Response: Please see responses to comments I1-1 and I1-2. No changes to the Draft EIR are required.

Comment I31-10 Response: The commenter's opposition to the proposed project, which involves improvements to the existing Raider Stadium on the Rio Americano High School campus, is noted. Please see responses to comments I31-1 through I31-9, above. No changes to the Draft EIR are required.

Comment I31-11 Response: Please see responses to comments I31-2, I1-1, I1-2, I1-13, and Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I31-12 Response: Please see responses to comments I31-1 through I31-11, above. No changes to the Draft EIR are required.

Comment I31-13 Response: Draft EIR Section 4.2, "Biological Resources," contains a thorough analysis of all biological resources that could potentially be affected by the proposed project. Full citations for all references cited in Draft EIR Section 4.2, along with all of the other references cited in the Draft EIR, are provided in Draft EIR Chapter 8, "References." The reference material for these sources are by way of a database system in which the inputs and outputs are catered to the specific project location and conditions and, therefore, are not readily available as public maps. The link provided is that which is used by industry experts to gather the necessary data to inform the analysis. Copies of all of the listed references are included as part of the project's administrative record and are available upon request to the District. No changes to the Draft EIR are required.

Comment I31-14 Response: Although the commenter does not provide information as to which specific reference, or which section or page number of the Draft EIR to which she is referring, the District assumes the commenter is referring to the California Department of Education 2026 reference that is provided on Draft EIR page 8-1. The referenced website address listed on page 8-1 is: https://dq.cde.ca.gov/dataquesUdqcensus/EnrEthGrd.aspx?cds=3467 44 73436714&agglevel=School&year=2025-26&ro=y. This listed address is correct; however, because the full website address is so long, it was necessary to split it in half for formatting purposes, and therefore it is necessary to use the entire address as a complete search term. The root webpage to access CDE Dataquest is: https://dq.cde.ca.gov/dataquest/, which is available based on a simple Internet query. No password is required to access the data provided by CDE. Following the prompts to select the school, and the school name, and the annual enrollment data, yields the data cited in the reference and the exact website address that is listed on Draft EIR page 8-1. As noted above, copies of all of the references cited in Draft EIR Section 4.2 are included as part of the project's administrative record and are available to the public, upon request to the District. No changes to the Draft EIR are required.

Comment I31-15 Response: The Draft EIR contains as appropriate description of the proposed project in Chapter 3, "Project Description." The detailed items requested by the commenter

(such as blueprints) are not required for the EIR. The images and renderings contained in the Draft EIR are easy to read and are provided according to the latest technology available using Portable Data Format (.pdf). The "renderings shared [by the District] outside of the Draft EIR" are, as noted by the commenter, not part of EIR and therefore this part of the comment does not pertain to the environmental analysis. No changes to the Draft EIR are required.

Comment I31-16 Response: Please see responses to comments I31-2 and I31-4. No changes to the Draft EIR are required.

Comment I31-17 Response: The Draft EIR does not contain any "false or misleading assumptions." The Draft EIR correctly states that the proposed stadium lighting would only be used during the nighttime hours (the stadium lights obviously would not be needed during the daytime) (see Draft EIR Chapter 3, "Project Description"), and Draft EIR Section 5.13, "Recreation," correctly states that since the Parkway is closed to public use after sundown there would be no recreationists in the Parkway when the lights are in use. With regards to potential lighting issues experienced by the commenter outside her residence, as stated on Draft EIR page 4.1-22, 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* (2004) 119 Cal.App.4th 477, 493). Nevertheless, for purposes of full disclosure, the District has elected to provide a comparison of nighttime lighting changes from the surrounding private residences." This analysis is presented on Draft EIR pages 4.1-22 through 4.1-26. The commenter's generalized assumption regarding the start times of junior varsity games at other schools in different locations is noted; Draft EIR Section 3.2.1, "Project Components," pages 3-4 through 3-9, provides appropriate information regarding the existing and proposed uses of Raider Stadium after installation of the proposed lighting. Please see also response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-18 Response: The Draft EIR appropriately describes and evaluates potential physical impacts on the environment related to recreation in Section 5.13, "Recreation," and related to "ecological" concerns in Section 4.2, "Biological Resources." The Draft EIR contains a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13). Providing a description of "health and wellness activities occurring in the affected area," as requested by the commenter, has no relationship to the project's potential physical impacts on the environment, and therefore this information is not necessary. No changes to the Draft EIR are required.

Comment I31-19 Response: Please see response to comment I31-4. No changes to the Draft EIR are required.

Comment I31-20 Response: Please see response to comment I31-2. No changes to the Draft EIR are required.

Comment I31-21 Response: The geographic extent of the project's potential physical impacts on the environment, including the American River Parkway, is appropriately described and evaluated throughout all of the individual topic areas in the Draft EIR. No changes to the Draft EIR are required.

Comment I31-22 Response: Because the commenter does not provide any specifics as to items in the Draft EIR that she believes are deficient, the District is unable to respond with specificity other than to state that all of the individual topic areas in the Draft EIR contain thorough and complete analyses of the project's potential physical impacts on the environment, which are substantiated by substantial evidence as presented and discussed throughout the Draft EIR. No changes to the Draft EIR are required.

Comment I31-23 Response: Please see response to comment I31-2. No changes to the Draft EIR are required.

Comment I31-24 Response: Please see response to comment I31-2. No changes to the Draft EIR are required.

Comment I31-25 Response: The Draft EIR thoroughly and appropriately evaluates all of the potential physical environmental impacts from the proposed project, including increased bleacher seating and spectator capacity, vibration, and crowd noise impacts on residents and the Parkway as requested by the commenter. Please see responses to comments I1-1, I1-2, and I1-13, and Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I31-26 Response: Draft EIR Section 4.1, "Aesthetics," includes appropriate representative viewpoints documenting both existing conditions (pages 4.1-2 through 4.1-6 and 4.1-8) and visual simulations (pages 4.1-20 through 4.1-24). No changes to the Draft EIR are required.

Comment I31-27 Response: The Draft EIR appropriately evaluates the potential project-related noise impacts to the Parkway in Section 4.2, "Biological Resources," page 4.2-20. No changes to the Draft EIR are required.

Comment I31-28 Response: Please see response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-29 Response: Please see responses to comments I31-26, I79-11, I79-12, and I47-29. No changes to the Draft EIR are required.

Comment I31-30 Response: The noise analyses suggested by the commenter are contained in Draft EIR Section 4.3, "Noise and Vibration"; please see Impact 4.3-1, pages 4.3-18 through 4.3-27. No changes to the Draft EIR are required.

Comment I31-31 Response: The Draft EIR analyzes the potential for bicycle and pedestrian use, access, and safety in Appendix E (Local Transportation Plan), Impact 4.4-1 (Draft EIR pages 4.4-8 through 4.4-9), and Impact 4.4-3 (Draft EIR pages 4.4-11 through 4.4-17). With regards to the commenter's request that the Draft EIR evaluate the impacts on Parkway trails from people "wandering from events before, during, and after," this is not an impact from the proposed project. The project site is situated on the Rio Americano High School Campus, and attendees at the improved Raider Stadium would be expected to be situated on the school campus (which is fenced), or traveling through the school campus from American River

Drive to the stadium from off-site parking on local streets (identified in Draft EIR Exhibit 4.4-2, page 4.4-5). No changes to the Draft EIR are required.

Comment I31-32 Response: Please see response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-33 Response: As discussed in Response to Comment O4-11, Education Code Section 38131 provides for community use of public school facilities, and the District's Use of School Facilities Handbook establishes procedures governing authorized use of District facilities, including Raider Stadium. Such uses would remain subject to applicable District policies and facility-use requirements.. No changes to the Draft EIR are required.

Comment I31-34 Response: Please see responses to comment I31-1 through I31-33. No changes to the Draft EIR are required.

Comment I31-35 Response: Draft EIR Chapter 3, "Project Description," contains a finite, stable project description which has been used consistently throughout all of the topic area analysis contained in the Draft EIR. Please see additional details in response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-36 Response: Please see response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-37 Response: The Draft EIR thoroughly analyzes both daytime and nighttime uses that are proposed at Raider Stadium, as described in Chapter 3, "Project Description," throughout all topic areas. Please see also response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-38 Response: Please see response to comment I31-37. No changes to the Draft EIR are required.

Comment I31-39 Response: Draft EIR Section 4.3, "Noise and Vibration," thoroughly analyzes noise from "the full range of proposed activities, including crowd noise, public-address announcements, amplified music, bands, whistles, cheering, and event personnel" as requested by the commenter. The analysis in Draft EIR Section 4.3 includes ambient noise measurements under existing conditions, and then evaluates predicted sound levels and changes in the acoustic environment under representative and reasonably foreseeable operating conditions, as requested by the commenter. Draft EIR Section 4.2, "Biological Resources," thoroughly analyzes the potential for project-related events at Raider Stadium to affect wildlife, including noise, on pages 4.2-15 through 4.2-17 and pages 4.2-20 through 4.2-24. The Draft EIR also contains a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13). Please see also response to comment I47-18. No changes to the Draft EIR are required.

Comment I31-40 Response: The analyses requested by the commenter are contained throughout all of the topic area sections of the Draft EIR. Draft EIR Mitigation Measures 4.3-1a and 4.3-1b (Draft EIR pages 4.3-24 through 4.3-26) provide feasible, enforceable, performance standards that would be implemented to reduce the project's noise

impacts. As discussed on Draft EIR page 4.3-27 and listed in Draft EIR Section 7.4, "Significant and Unavoidable Impacts," (page 7-14) the only impact that would remain significant and unavoidable even after the implementation of all feasible mitigation measures would be generation of a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards (i.e., temporary short-term construction noise, and operational stadium event noise). No changes to the Draft EIR are required.

Comment I31-41 Response: Please see responses to comments I31-26, I79-11, I79-12, and I47-29. No changes to the Draft EIR are required.

Comment I31-42 Response: Please see responses to comments I31-26, I79-11, I79-12, and I47-29. No changes to the Draft EIR are required.

Comment I31-43 Response: Biological resources, wildlife, and habitat are evaluated in the Draft EIR in relation to the actual stadium operations, including the specifics requested by the commenter. Please see Draft EIR Section 4.2, "Biological Resources." No changes to the Draft EIR are required.

Comment I31-44 Response: The analyses requested by the commenter are contained in Draft EIR Section 4.2, "Biological Resources." No changes to the Draft EIR are required.

Comment I31-45 Response: Please see response to comment I31-44. No changes to the Draft EIR are required.

Comment I31-46 Response: Please see response to comment I31-2. No changes to the Draft EIR are required.

Comment I31-47 Response: Please see response to comment I31-2. No changes to the Draft EIR are required.

Comment I31-48 Response: Please see response to comment I31-7. No changes to the Draft EIR are required.

Comment I31-49 Response: Please see response to comment I31-7. No changes to the Draft EIR are required.

Comment I31-50 Response: Please see response to comment I31-33. No changes to the Draft EIR are required.

Comment I31-51 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I31-52 Response: Please see responses to comment I31-13, I31-14, I31-17, and I47-18. No changes to the Draft EIR are required.

Comment I31-53 Response: The Draft EIR includes feasible, enforceable mitigation with performance standards throughout the Draft EIR (where necessary) to reduce the project's environmental impacts. Please see also Master Response 7: Operations

Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I31-54 Response: Please see responses to comment I47-18 and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I31-55 Response: Please see response to comment I47-18 and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I31-56 Response: The Draft EIR includes an appropriate analysis of alternatives in Draft EIR Chapter 6, "Alternatives," including the options suggested by the commenter, and includes feasible, enforceable mitigation with performance standards throughout the Draft EIR (where necessary) as requested by the commenter. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I31-57 Response: Most of this comment does not pertain to the adequacy of the environmental analysis contained in the EIR. Draft EIR Chapter 6, "Alternatives" evaluates two potential alternatives that would avoid or reduce the project's significant impacts, as requested by the commenter. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I31-58 Response: Please see responses to comments I31-1 through I31-57. No changes to the Draft EIR are required.

Comment I31-59 Response: Please see Master Response 9: Cumulative Impacts and response to comment I31-7. The cell tower at the Rio Americano High School Campus is included in the Draft EIR's cumulative analysis, as shown in Table 7-1 (Draft EIR page 7-2).

Comment I31-60 Response: Please see response to comment I31-29. Although the commenter states, "I took pictures of number of places where you see the goals posts from paved bike trail, unpaved trails, from mitigation planting area, from unpaved trails west and east and behind the stadium," these are clearly not the photographs submitted in comment I31-67, because these photographs do not show the project site or any potential views of the proposed Raider Stadium improvements. No changes to the Draft EIR are required.

Comment I31-61 Response: Please see responses to comments I31-1 through I31-60. No changes to the Draft EIR are required.

Comment I31-62 Response: Written responses to the commenter's concerns are provided in responses I31-1 through I31-67.

Comment I31-63 Response: For the reasons explained in responses to comments I31-1 through I31-62, there is no new analysis required nor is there any substantial new information, new mitigation measures, or new alternatives. Therefore, recirculation of the Draft EIR is not required.

Comment I31-64 Response: Please see responses to comments I31-1 through I31-63. The commenter's disagreement with the analysis and conclusions contained in the Draft EIR is noted. No changes to the Draft EIR are required.

Comment I31-65 Response: Please see responses to comments I31-1 through I31-64. The commenter's disagreement with the analysis and conclusions contained in the Draft EIR is noted. No changes to the Draft EIR are required.

Comment I31-66 Response: The commenter's disagreement with the proposed project is noted. No changes to the Draft EIR are required.

Comment I31-67 Response: The photographs submitted by the commenter do not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted (please see also response to comment I31-60). The commenter's letter has been included in the project's administrative record and the FEIR.

COMMENT LETTER I32. BARBARA GARDNER; OCTOBER 14, 2026

Response to Comment Letter I32. Barbara Gardner

Comment I32-1 Response: This comment letter (I32), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Please see also response to comment I1-1.

Comment I32-2 Response: Please see response to comment I1-2.

Comment I32-3 Response: Please see response to comment I1-3.

Comment I32-4 Response: Please see response to comment I1-4.

Comment I32-5 Response: Please see response to comment I1-5.

Comment I32-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I32-7 Response: Please see response to comment I1-8.

Comment I32-8 Response: Please see responses to comments I1-9.

Comment I32-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I32-10 Response: Please see response to comment I1-12.

Comment I32-11 Response: Please see response to comment I1-13.

Comment I32-12 Response: Please see response to comment I1-14.

Comment I32-13 Response: Please see response to comment I1-15.

COMMENT LETTER I33. MARGARET GOERIG; OCTOBER 16, 2026

Response to Comment Letter I33. Margaret Goerig

Comment I33-1 Response: The commenter's opposition to the proposed project is noted.

Comment I33-2 Response: Please see response to comment I1-1.

Comment I33-3 Response: Please see response to comment I1-2.

Comment I33-4 Response: Please see response to comment I1-3.

Comment I33-5 Response: Please see response to comment I1-4.

Comment I33-6 Response: Please see response to comment I1-5.

Comment I33-7 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I33-8 Response: Please see response to comment I1-9.

Comment I33-9 Response: Please see response to comment I1-10 and I1-11.

Comment I33-10 Response: Please see response to comment I1-12.

Comment I33-11 Response: Please see response to comment I1-13.

Comment I33-12 Response: Please see response to comment I1-14.

Comment I33-13 Response: Please see response to comment I1-15.

COMMENT LETTER I34. ROWENA GRAY; OCTOBER 11, 2026

Response to Comment Letter I34. Rowena Gray

Comment I34-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I34-2 Response: The potential effect of hot weather on travel behavior is noted. As described in Draft EIR Section 4.4, "Transportation and Circulation," the parking analysis assumes that approximately 10 percent of attendees would remain on campus after school or walk or bicycle to the event due to proximity to the school, with the remaining attendees traveling by vehicle. Please see Master Response 6: Parking Availability regarding the parking demand and supply analysis for general and higher attendance events. No changes to the Draft EIR are required.

Comment I34-3 Response: The potential for students to leave campus between school dismissal and an evening event and return by vehicle is noted. The Draft EIR transportation analysis evaluates event-related travel and parking demand based on anticipated attendance, vehicle occupancy, and the number of attendees expected to remain on campus or walk or bicycle to the event. The Draft EIR does not separately identify interim trips for meals or other activities between school dismissal and an evening event. Please see Master Response 6: Parking Availability regarding the parking demand and supply analysis for general and higher attendance events. No changes to the Draft EIR are required.

Comment I34-4 Response: Please see Master Response 6: Parking Availability. Draft EIR Mitigation Measure 4.4-3a requires the District to coordinate with Jesuit High School for a Shared Parking Use Agreement for events anticipated to require off-site parking. The agreement is required to include signage directing attendees to Jesuit parking and security protocols to ensure that the Jesuit parking areas are open and available to Rio Americano High School event attendees. Mitigation Measure 4.4-3b also requires an Event Transportation Management Plan that identifies designated off-site parking locations and pedestrian routes or transportation arrangements, provides advance parking information to attendees, and provides event staff and directional signage. No changes to the Draft EIR are required.

Comment I34-5 Response: The Local Transportation Analysis evaluates event-related traffic and parking under both general event conditions and a higher attendance scenario based on peak observed football game attendance. The parking analysis assumes that the majority of attendees would travel by vehicle and identifies potential parking deficits during higher attendance events. Please see Master Response 6: Parking Availability regarding the parking demand and supply analysis and measures addressing off-site parking. The commenter's suggestion that additional on-campus parking be constructed as part of the proposed project is noted. No changes to the Draft EIR are required.

COMMENT LETTER I35. KONSTANTIN GRIGORYAN; OCTOBER 14, 2026

Response to Comment Letter I35. Konstantin Grigoryan

Comment I35-1 Response: The District appreciates the support for the proposed project expressed by the commenter, and for addressing potential environmental and neighborhood impacts through appropriate planning and mitigation. The Draft EIR evaluates the potential physical environmental impacts of the proposed project and includes feasible mitigation measures where necessary to reduce potentially significant impacts. The comment is noted.

Comment I35-2 Response: The District appreciates the support for the proposed project expressed by the commenter.

Comment I35-3 Response: The commenter's support for considering the proposed project in relation to the American River Parkway is noted. Potential physical environmental impacts on the American River Parkway are evaluated throughout the Draft EIR, including in Section 4.1, "Aesthetics," Section 4.2, "Biological Resources," Section 5.9, "Land Use and Planning," and Section 5.13, "Recreation." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use regarding the proposed project's relationship to the American River Parkway and applicable plans and regulations. No changes to the Draft EIR are required.

Comment I35-4 Response: The Draft EIR separately evaluates the project's construction- and operation-related environmental impacts. Potential nighttime lighting and glare impacts are evaluated in Draft EIR Section 4.1, "Aesthetics," potential impacts on biological resources are evaluated in Section 4.2, "Biological Resources," and operational noise impacts are evaluated in Section 4.3, "Noise and Vibration." Mitigation Measure 4.1-2 requires measures to reduce potential nighttime lighting and glare impacts, and Mitigation Measure 4.3-1b requires stadium event noise controls, including controls on public-address and amplified sound. Section 4.2 also includes mitigation measures to avoid and minimize potentially significant construction-related impacts on biological resources. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I35-5 Response: The commenter's support for protecting the American River Parkway while allowing improvements to existing school facilities is noted. Potential effects of the proposed project on the American River Parkway are evaluated in the Draft EIR, including in Sections 4.1, "Aesthetics," 4.2, "Biological Resources," 5.9, "Land Use and Planning," and 5.13, "Recreation." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I35-6 Response: The Draft EIR evaluates potential impacts related to lighting, noise, parking, traffic, and public safety and includes mitigation measures where necessary. Mitigation Measure 4.1-2 addresses potential nighttime lighting and glare impacts; Mitigation Measure 4.3-1b requires stadium event noise controls; and Mitigation Measures 4.4-3a through 4.4-3c address event parking, transportation management, pedestrian and vehicle circulation, and access during highly

attended events. Please see also Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation. The commenter's support for practical and measurable mitigation measures and coordination with neighboring residents and other stakeholders is noted. No changes to the Draft EIR are required.

Comment I35-7 Response: The commenter's support for consideration of the cell tower and for transparent environmental review of that project is noted. The cell tower is a separate project from the proposed Rio Americano High School Stadium Improvements Project. For more information, please refer to Master Response 9: Cumulatives Analysis. No changes to the Draft EIR are required.

Comment I35-8 Response: The District appreciates the support for the proposed project expressed by the commenter in the context of implementing appropriate mitigation measures that would address potential environmental impacts. The Draft EIR evaluates the potential physical environmental impacts of the proposed project and identifies feasible mitigation measures where necessary. The comment is noted.

COMMENT LETTER I36, GREG AND LIYAN GRIMM, AUGUST 27, 2026

Response to Comment Letter I-36, Greg and Liyan Grimm

Comment I36-1 Response: Please see response to comment I1-1. Responses to additional specific comments are provided in I36-2 through I36-15.

Comment I36-2 Response: Please see response to comment I1-1, Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation, and Master Response 6: Parking Availability.

Comment I36-3 Response: The Draft EIR contains an analysis of realistic maximum-attendance scenarios. The traffic and noise analyses include both a "general event" of average home football game attendance, and a "conservative event" scenario aligning with peak attendance for an event like the Jesuit High School football game (Draft EIR Appendix E pages 3 and 4; Draft EIR Section 4.4, "Traffic and Transportation," pages 4.4-1, 4.4-10, 4.4-13; Draft EIR Section 4.3, "Noise and Vibration," pages 4.3-16 through 4.3-28). Please see also Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I36-4 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I36-5 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation, and Master Response 6: Parking Availability.

Comment I36-6 Response: A less intensive alternative, as requested by the commenters, is evaluated in the Draft EIR as the No Project Alternative (described on Draft EIR pages 6-4 and 6-5). With regards to the commenter's request for enforceable limits on event frequency and hours, please see response to comment I47-18. As stated on Draft EIR page 4.3-15, the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I36-7 Response: Please see response to comment I1-8. No changes to the Draft EIR are required.

Comment I36-8 Response: Please see response to comment I1-13. No changes to the Draft EIR are required.

Comment I36-9 Response: Please see response to comment I1-13. No changes to the Draft EIR are required.

Comment I36-10 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I36-11 Response: The commenters' opposition to the project is noted.

Comment I36-12 Response: The commenter's request to evaluate smaller scale athletic improvements and other alternative locations would not result in a difference from existing conditions at Raider Stadium, and is analyzed in the Draft EIR as Alternative 1: No Project Alternative. For more on this, please refer to Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I36-13 Response: With regards to event frequency, please see response to comment I1-9. Because the commenter does not reference specific mitigation measures, the District cannot respond with specificity other than to state that enforceable mechanisms are incorporated as part of all of the mitigation measures contained in the Draft EIR; therefore, no changes to the Draft EIR are required.

Comment I36-14 Response: The Draft EIR provides a complete and transparent analysis, as requested by the commenter, of the project's potential physical impacts on the environment. A smaller scale alternative (the No Project Alternative), and an alternative that would move Raider Stadium to a location further from the Parkway and also reduce noise levels (Alternative 2) are evaluated in Draft EIR Chapter 6, "Alternatives." For more on this, pleas frefer to Master Response 8: Alternatives. The commenters' opposition to the project is noted.

Comment I36-15 Response: The commenters' letter and attached photos have been included in project's administrative record, and written responses to the issues raised by the commenter's are provided in responses I36-1 through I36-13, above.

COMMENT LETTER I37, WILLIAM GRISSOM, SEPTEMBER 2, 2026

Response to Comment Letter I37, William Grissom

Comment I37-1 Response: Draft EIR Section 4.3, "Noise and Vibration," evaluates operational stadium event noise, including noise associated with the public address system. Please see Draft EIR Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls. Mitigation Measure 4.3-1b requires the public address system to include digital signal processing or equivalent volume-limiting controls to establish a maximum output level that cannot be exceeded by event staff. The measure also requires a maximum public address system noise level of 70 dBA Lmax at the nearest residential property line and requires the approved public address system settings to be documented and maintained for evening events. No changes to the Draft EIR are required.

COMMENT LETTER I38. WILLIAM GRISSOM; SEPTEMBER 8, 2026

Response to Comment Letter I38. William Grissom

Comment I38-1 Response: The commenter references prior agreements between the District and surrounding neighborhoods, as well as prior litigation related to earlier stadium improvement proposals is noted. This comment does not pertain to the adequacy of the environmental analysis contained in the EIR.

Comment I38-2 Response: Please see Draft EIR Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls. Mitigation Measure 4.3-1b requires the public address system to include digital signal processing or equivalent volume-limiting controls that establish a maximum output level that cannot be exceeded by event staff. The measure also requires the approved public address system settings to be documented and maintained for evening events. These controls prevent event staff from increasing the public address system volume above the established maximum output level. No changes to the Draft EIR are required.

COMMENT LETTER I39. CARY HART; OCTOBER 17, 2026

Response to Comment Letter I39. Cary Hart

Comment I39-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I39-2 Response: Please see response to comment I1-1.

Comment I39-3 Response: Please see response to comment I1-2.

Comment I39-4 Response: Please see response to comment I1-3.

Comment I39-5 Response: Please see response to comment I1-4.

Comment I39-6 Response: Please see response to comment I1-5.

Comment I39-7 Response: Please see responses to comments I1-6 and I1-7.

Comment I39-8 Response: Please see response to comment I1-8.

Comment I39-9 Response: Please see response to comment I1-9.

Comment I39-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I39-11 Response: Please see response to comment I1-12.

Comment I39-12 Response: Please see response to comment I1-13.

Comment I39-13 Response: Please see response to comment I1-14.

Comment I39-14 Response: Please see response to comment I1-15.

COMMENT LETTER I40. PHYLLIS HAYES; OCTOBER 14, 2026

Response to Comment Letter I40. Phyllis Hayes

Comment I40-1 Response: Please see response to comment I1-1.

Comment I40-2 Response: Please see response to comment I1-2.

Comment I40-3 Response: Please see response to comment I1-3.

Comment I40-4 Response: Please see response to comment I1-4.

Comment I40-5 Response: Please see response to comment I1-5.

Comment I40-6 Response: Please see response to comment I1-6.

Comment I40-7 Response: Please see response to comment I1-7.

Comment I40-8 Response: Please see response to comment I1-8.

Comment I40-9 Response: Please see response to comment I1-9.

Comment I40-10 Response: Please see response to comment I1-10.

Comment I40-11 Response: Please see response to comment I1-11.

Comment I40-12 Response: Please see response to comment I1-12.

Comment I40-13 Response: Please see response to comment I1-13.

Comment I40-14 Response: Please see response to comment I1-14.

Comment I40-15 Response: Please see response to comment I1-15.

COMMENT LETTER I41. CANDICE HEINZ; OCTOBER 15, 2026

Response to Comment Letter I41. Candice Heinz

Comment I41-1 Response: This comment letter (I41), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comment are provided in I41-2 through I41-21.

Comment I41-2 Response: Because the commenter has not provided any details as to how she believes the Draft EIR is deficient, the District cannot respond with specificity other than to state that the Draft EIR provides a thorough and complete analysis of the project's potential physical impacts on the environment. No changes to the Draft EIR are required.

Comment I41-3 Response: The project's cumulative impacts are not addressed separately throughout the report; all of the project's cumulative impacts are evaluated in Draft EIR Section 7.1, "Cumulative Impacts," (pages 7-1 through 7-13). As stated on Draft EIR page 7-7, climate change impacts from greenhouse gas (GHG) emissions are inherently cumulative in nature and therefore are appropriately addressed in the detailed discussion presented in Draft EIR Section 5.6, "Greenhouse Gas Emissions." No changes to the Draft EIR are required.

Comment I41-4 Response: Master Response 9: Cumulative Impacts and Related Projects.

Comment I41-5 Response: The analysis of potential project impacts on biological resources in the Parkway considered nighttime noise; please see Draft EIR Section 4.2, "Biological Resources," pages 4.2-20 and 4.2-21. With regards to the commenter's request for additional wildlife noise analyses, the commenter has not presented any established "quantitative wildlife noise thresholds or individual species tolerances" that she believes should have been evaluated in the Draft EIR. The Draft EIR incorporates an appropriate science-based approach. Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. No changes to the Draft EIR are required.

Comment I41-6 Response: Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. No changes to the Draft EIR are required.

Comment I41-7 Response: Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. No changes to the Draft EIR are required.

Comment I41-8 Response: Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. No changes to the Draft EIR are required.

Comment I41-9 Response: The commenter is not clear about how the stated noise measurement represent an "outlier. The text summarizes the data and points to section 4.3, "Noise and Vibration," for additional details. The comment does not make clear what additional monitoring would achieve. No changes to the Draft EIR are required.

Comment I41-10 Response: Please see Master Response 2 Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. No changes to the Draft EIR are required.

Comment I41-11 Response: Please see response to comment I1-12.

Comment I41-12 Response: Please see responses to comments I47-6 and I47-10. Furthermore, the DarkSky "pass" rating required by Draft EIR Mitigation Measure 4.1-2 (page 4.1-26) has been received and is attached to this FEIR as Appendix B.

Comment I41-13 Response: Under CEQA, the lead agency has discretion to select the methodology it uses to analyze potential impacts so long as the approach is reasonable and supported by substantial evidence in the record. CEQA does not mandate a particular model or require quantitative modeling in all cases. The CEQA Guidelines emphasize that an EIR must include a "sufficient degree of analysis" to inform decision-makers and the public, but it "need not be exhaustive" or perfect to be adequate; the key is a good-faith effort with reasoned analysis supported by evidence (Guidelines §§15064, 15144, 15151)

The project does not introduce substantial sources of ground-borne vibration (e.g., rail operations, continuous heavy industrial equipment, or frequent impulsive sources like pile driving). Spectator activity and public address systems are primarily airborne noise sources and are not reasonably expected to generate off-site ground-borne vibration at levels of concern. Given that context, a qualitative explanation is sufficient under CEQA to conclude operational vibration impacts would be less than significant. No changes to the Draft EIR are required.

Comment I41-14 Response: The Draft EIR contains a thorough and complete analysis of both daytime and nighttime activities that would occur at Raider Stadium after the proposed lighting is installed, throughout all of the topic areas contained in the Draft EIR. An analysis of the project's proposed lighting at dusk in relationship to the Parkway, including visual simulations, is contained in Draft EIR Impact 4.2-1 (pages 4.1-18 through 4.1-26). The Draft EIR correctly notes that the levee crown road is a maintenance access road for use by the U.S. Army Corps of Engineers, the Sacramento Area Flood Control Agency, and their authorized contractors; public vehicular traffic is prohibited and the levee crown road is not designated as a trail. Nevertheless, the Draft EIR analyzes the potential impact from pedestrians and bicyclists who may use the levee crown maintenance road in Impacts 4.1-1 and 4.1-2 (Draft EIR pages 4.1-16 through 4.1-26). Draft EIR Section 5.13, "Recreation," correctly states that there would be no conflicts between recreationists using the Parkway and Raider Stadium nighttime events when higher attendance is expected, because the additional parking for high-attendance events would be on-street parking that is located 0.25 mile or more from the Parkway. Because the proposed project would be entirely confined within the Rio Americano High School campus, there is no potential for the project to physically alter Parkway recreational facilities, as correctly stated in Draft EIR Section 5.13, "Recreation." Draft EIR Section 4.1, "Aesthetics," Impacts 4.1-1 and 4.1-2 contain thorough and complete analyses, including visual simulations, of potential impacts to Parkway viewers from the proposed lighting. No changes to the Draft EIR are required.

Comment I41-15 Response: The minor changes to the campus electrical system to accommodate the proposed new lighting would be installed according to the electrical requirements of the California Building Standards Code. Thus, there would be no increased

fire risk from the electrical system as suggested by the commenter. No changes to the Draft EIR are required.

Comment I41-16 Response: The commenter propounds a theory that simply because more people will be present on the Rio Americano High School campus during high-attendance sports events, that this fact alone will result in increased potential for fire starts on the campus. The commenter provides no factual evidence to support this theory. Furthermore, the proposed project is confined to the existing Raider Stadium (which is composed of a synthetic track, center turf grass oval, metal bleachers, metal scoreboard, and buildings), and paved drive isles and the paved main campus parking lot. There is no potential for additional fire risk from implementing the proposed project. Please see also Draft EIR Section 5.15, "Wildland Fire Hazards." No changes to the Draft EIR are required.

Comment I41-17 Response: The commenter's opinion that the event transportation management plans (required as part of Draft EIR Mitigation Measures 4.4-3b and 4.4-3c) would not be effective is noted. With regards to evacuation, please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment I41-18 Response: The cell tower associated with the Rio Americano High School campus is not part of the proposed project, and therefore the analysis requested by the commenter is not required as part of the Draft EIR. The cell tower is analyzed in Draft EIR Section 7.1, "Cumulative Impacts." Please see also Master Response 9: Cumulative Impacts and Related Projects. No changes to the Draft EIR are required.

Comment I41-19 Response: Please see response to comment I41-18.

Comment I41-20 Response: Please see response to comment I1-9.

Comment I41-21 Response: For the reasons explained above in responses to comments I41-2 through I41-20, no changes to the Draft EIR are required. The commenter's opposition to the proposed project is noted.

COMMENT LETTER I42. REINHARD HOHLWEIN; OCTOBER 16, 2026

Response to Comment Letter I42. Reinhard Hohlwein

Comment I42-1 Response: Draft EIR Section 4.2, "Biological Resources," evaluates potential effects of operational nighttime lighting on wildlife and habitat within the American River Parkway, including effects on wildlife foraging, nesting, roosting, and movement. The analysis considers the anticipated frequency and timing of nighttime stadium events and concludes that operational lighting impacts on wildlife would be less than significant. Draft EIR Section 4.1, "Aesthetics," also evaluates potential nighttime light trespass, glare, and skyglow. Please also see Mitigation Measure 4.1-2 and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I42-2 Response: Draft EIR Chapter 6, "Alternatives," evaluates Alternative 2: Reconfigure Stadium and Athletic Fields, which would relocate Raider Stadium to the northeastern portion of the campus, approximately 875 feet from the American River Parkway. The Draft EIR evaluates the environmental impacts of this alternative in comparison to the proposed project. Potential impacts on the American River Parkway are also evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 5.13, "Recreation." Please also see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 8: Alternatives. No changes to the Draft EIR are required.

COMMENT LETTER I43. EVAN HOOD; SEPTEMBER 9, 2026

Response to Comment Letter I43. Evan Hood

Comment I43-1 Response: The District appreciates the support for the proposed project expressed by the commenter. The comment is noted.

COMMENT LETTER I44. MICHAEL HOOPER; SEPTEMBER 8, 2026

Response to Comment Letter I44. Michael Hooper

Comment I44-1 Response: The commenter's statements that she has never noticed any "light pollution" from nighttime games held at the Jesuit High School stadium and has never heard any noise from that sound system are noted. The commenter's opinion that since the distance to Rio Americano High School is 50 feet further from her residence, she does not expect any light or sound issues, is also noted. Potential nighttime lighting impacts and noise impacts from the proposed project are evaluated in Draft EIR Section 4.1, "Aesthetics," and Section 4.3, "Noise and Vibration."

Comment I44-2 Response: The District appreciates the support for the proposed project expressed by the commenter. The comment is noted.

COMMENT LETTER I45. GAY JONES; OCTOBER 14, 2026

Response to Comment Letter I45. Gay Jones

Comment I45-1 Response: Please see response to comment I1-1.

Comment I45-2 Response: Please see response to comment I1-2.

Comment I45-3 Response: Please see response to comment I1-3.

Comment I45-4 Response: Please see response to comment I1-4.

Comment I45-5 Response: Please see response to comment I1-5.

Comment I45-6 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I45-7 Response: Please see response to comment I1-9.

Comment I45-8 Response: Please see responses to comments I1-10 and I1-11.

Comment I45-9 Response: Please see response to comment I1-12.

Comment I45-10 Response: Please see response to comment I1-13.

Comment I45-11 Response: Please see response to comment I1-14.

Comment I45-12 Response: Please see response to comment I1-15.

COMMENT LETTER I46. PAUL JORJORIAN; SEPTEMBER 26, 2026

Response to Comment Letter I46. Paul Jorjorian

Comment I46-1 Response: Please see response to comment I1-1.

Comment I46-2 Response: Please see response to comment I1-2.

Comment I46-3 Response: Please see response to comment I1-3.

Comment I46-4 Response: Please see response to comment I1-4.

Comment I46-5 Response: Please see response to comment I1-5.

Comment I46-6 Response: Please see response to comment I1-6.

Comment I46-7 Response: Please see response to comment I1-7.

Comment I46-8 Response: Please see response to comment I1-8.

Comment I46-9 Response: Please see response to comment I1-9.

Comment I46-10 Response: Please see response to comment I1-10.

Comment I46-11 Response: Please see response to comment I1-11.

Comment I46-12 Response: Please see response to comment I1-12.

Comment I46-13 Response: Please see response to comment I1-13.

Comment I46-14 Response: Please see response to comment I1-14.

Comment I46-15 Response: Please see response to comment I1-15.

COMMENT LETTER I47. BRUCE KAMILOS; OCTOBER 2, 2026

Response to Comment Letter I47. Bruce Kamilos

Comment I47-1 Response: This comment letter (I47), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to specific comments are provided in responses to Comments I47-2 through I47-50.

Comment I47-2 Response: The District appreciates the commenter's support for safe, accessible athletic facilities for students. The proposed project would provide permanent nighttime lighting at the existing Raider Stadium, and would build on the existing safe, accessible student athletic facilities at the Rio Americano High School campus. The Draft EIR contains a complete and reliable analysis of the physical environmental impacts associated with construction and operation of the proposed project. The commenter's objection to EIR certification and adoption of the proposed project is noted. Responses to specific comments are provided in responses I47-2 through I47-50.

Comment I47-3 Response: As discussed in detail in Draft EIR Chapter 3, "Project Description," the proposed project consists of the following improvements at the existing Raider Stadium on the Rio Americano High School campus: installing new high-mast light standards (which would replace the use of temporary portable nighttime lighting), removing the existing bleachers and installing new and expanded bleacher seating, and installing an upgraded public address system and a new press box. The necessary "safety and accessibility improvements" associated with the proposed project are new light standards that would be installed along the existing paved fire lane between the stadium and the main campus parking lot and at gates along the western side of the stadium to provide improved pedestrian nighttime visibility associated with potential increased attendance at nighttime games, as well as safety gates – these features are included to achieve DSA safety requirements for the proposed project design (also described in Draft EIR Chapter 3, "Project Description"). Raider Stadium has an existing public address system, which has been in use for many years; however, the public address system is proposed to be replaced as a part of the proposed project. The intent of the permanent high-mast light standards is to allow all of the school's sporting events to be held on campus at Raider Stadium, instead of holding them off-site at the El Camino High School's stadium. Holding these events on campus would likely result in increased attendance, and therefore an increased amount of bleacher seating is included as part of the proposed project. All of the proposed project elements described in the Project Description (Draft EIR Chapter 3) are fully evaluated through all of the topic areas of the Draft EIR. Since the commenter has failed to identify what specific "safety and security benefits" should have been included in the proposed project or another alternative and evaluated in the Draft EIR, the District cannot respond with specificity. For the reasons stated above, no changes to the Draft EIR are required. The Alternatives chapter (Draft EIR Chapter 6) evaluates a broad range of potentially feasible alternatives to the proposed project, as well as a no project alternative. This chapter also details why some alternative concepts that were originally considered were ultimately rejected due to obvious feasibility issues, including a new off-campus location for events, rescheduling to morning hours, and the use

of existing off-site facilities. For more on this, please refer to Master Response 8: Alternatives.

Comment I47-4 Response: A reduced capacity, no permanent lighting, and operations-limited alternative was evaluated in Draft EIR Chapter 6, "Alternatives" – this is the No Project Alternative, which is described in detail on Draft EIR pages 6-4 and 6-5, and evaluated in Draft EIR Section 6.5 on pages 6-6 through 6-17. Please see also Master Response 6: Alternatives. See also Master Response 8 regarding Alternatives requirements of the Draft EIR. Regarding a reduced capacity or limited-operations approach, one of the project objectives is to [p]rovide 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. Another project objective is to "[e]xpand the capability of Rio Americano High School to host athletic and non-athletic events...." (Draft EIR, page 6-3). The focus of alternatives analysis must be on 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. Reducing the capacity of the proposed facilities would conflict with multiple project objectives. Regarding an earlier curfew, the project objectives include: "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; 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" (Draft EIR, page 6-3). Creating an earlier curfew point for the use of Rio Americano's facilities would not allow scheduling of practices and competitions outside of the normal classroom instruction times of the day or scheduling of events during cooler parts of the day. No changes to the Draft EIR are required.

Comment I47-5 Response: The commenter has not provided any specific details, section titles, or page numbers in the Draft EIR where he believes that inaccurate or inconsistent information has been presented. Therefore, the District cannot respond with specificity to this comment other than to state that the Draft EIR contains consistent information regarding the proposed project which is described in Chapter 3, "Project Description," and evaluated throughout all of the topic area sections in the Draft EIR. With regard to the commenter's statement that some of the information in the Draft EIR consists of "nonbinding estimates," the commenter is correct. For example, the attendance data presented in Table 3-1 (Draft EIR Chapter 3, "Project Description," page 3-9) is based on historical attendance data and ticket counts maintained by the District from both daytime and nighttime sporting events. In fact, the Draft EIR consistently evaluates both a projected average attendance and a projected maximum attendance scenario, and quantifies the potential impacts therefrom as related to noise, traffic, parking (see Draft EIR Section 4.3, "Noise and Vibration," and Section 4.4, "Transportation and Circulation"). The District has comprehensively described the proposed project, including all operational components, and has included conservative assumptions (that would tend to overestimate the degree of impacts) where specific data regarding project elements was not available. The commenter has not cited any case, statute, regulation, or other authority that would require the District to place a finite limit on the number of evening events to be held each year were the project to be approved and completed. Furthermore, the commenter

has not specified any particular dataset that is allegedly inaccurate, and therefore the District cannot respond with specificity other than to state that the data provided throughout the Draft EIR is accurate, and that the District has made a good faith effort to provide the best available information. Therefore, no changes to the Draft EIR are required.

Comment I47-6 Response: The District assumes the commenter is referring to Draft EIR Impact 4.1-2 related to potential nighttime light and glare, which is evaluated on pages 4.1-18 through 4.1-26. Draft EIR Impact 4.1-2 summarizes the results of a photometric analysis for the proposed high-mast light standards that would be installed at the stadium. The photometric analysis was performed by Musco Lighting, and is attached to the Draft EIR as Appendix B. As discussed in last paragraph on Draft EIR page 4.1-25, modeling demonstrates that the proposed stadium lighting would result in zero light trespass off site at public viewpoints (American River Drive, Regency Circle, and the American River Parkway) . Modeling also demonstrates that glare and skyglow would be reduced to levels that meet International Dark Sky Association standards. Nonetheless, without the Dark Sky Association "pass" rating, the Draft EIR conservatively considered that the project could result in uplighting and glare. Therefore, the impact from potential nighttime lighting and glare was considered potentially significant (Draft EIR page 4.1-25). Mitigation Measure 4.1-2 (Draft EIR page 4.1-26) requires the District to 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. Since publication of the Draft EIR, the District submitted the proposed lighting design to the DarkSky International Association and, as provided in Attachment B to this FEIR, the proposed lighting system received a "pass" rating, meeting the requirements of Mitigation Measure 4.1-2. Therefore, with implementation of Mitigation Measure 4.1-2, the project's impacts related to nighttime lighting and glare are demonstrated to be reduced to a less-than-significant level. With regards to the commenter's reference to a "final operating policy," it is unclear to what the commenter is referring but, with the context of lighting and the DarkSky pass letter, the District assumes this to refer to how the proposed lighting system is operated. The Draft EIR evaluates the proposed lighting system under the maximum lighting conditions (i.e., all circuits and fixtures in use), and does not identify any potentially significant impact related to this lighting operation; therefore, no mitigation is identified and no specific operating policy necessary. Finally, the District notes that there is no "requirement" at any school for "post-installation field certification" related to lighting, and since the appropriate modeling has been performed by Musco Lighting and a DarkSky "pass" rating has been received (attached to this FEIR as Appendix B), there is no reason to require any type of "certification" post construction. For the reasons stated above, no changes to the Draft EIR are required.

Comment I47-7 Response: The District notes that, unlike the cited reference point by the commenter regarding a separate project, the Rio Americano High School campus is surrounded by existing development accessed via public streets where on-street parking is generally available. Please see Master Response 6: Parking Availability. Furthermore, the Draft EIR includes analyses of vehicle circulation and emergency access effects related to both on-site and *off-site* parking, and includes required mitigation measures, in Draft EIR Section 4.4, "Traffic and

Transportation," Impact 4.4-3 (pages 4.4-12 through 4.4-17) and Impact 4.4-4 (pages 4.4-17 and 4.4-18). Noise related to on-site and off-site parking is evaluated in Draft EIR Section 4.3, "Noise and Vibration," Impact 4.3-1 (pages 4.3-19 and 4.3-20). Please see also Master Response 6: Parking Availability.

With regards to the commenter's statement that the Draft EIR does not identify parking for the additional 296 vehicles under the "conservative scenario" (maximum attendance) event at Radar Stadium, Impact 4.4-3 was identified as potentially significant (Draft EIR page 4.4-13). Additional off-site parking would be provided at Jesuit High School through a Memorandum of Understanding, as required by Mitigation Measure 4.4-3a (Draft EIR page 4.4-15). Please see also Master Response 6: Parking Availability. For the reasons stated above, no changes to the Draft EIR are required.

Comment I47-8 Response: Because the commenter provides no details, such as Draft EIR section numbers, titles, or page numbers, it is unclear as to what "Parkway analysis" for which the commenter claims that daytime noise data have been used to evaluate nighttime disturbance, the commenter is referring. For purposes of this response, the District assumes the commenter is referring to Draft EIR Impact 4.2-1 in Section 4.2, "Biological Resources." Impact 4.2-1 contains an analysis of both construction- and operation-related potential noise effects on wildlife, as indicated under the headings "Construction-Related Impacts" on Draft EIR page 4.2-15, and "Operational Impacts" on Draft EIR page 4.2-17. The analysis of potential construction-related impacts appropriately uses daytime noise criteria, since construction work would only occur during the daytime hours. The analysis of potential operation-related impacts appropriately uses acoustic measurements that were taken during evening ambient conditions to determine the baseline ambient noise level in the project site and vicinity (presented on Draft EIR page 4.2-20), as well as reference measurements taken during a Rio Americano High School nighttime football game hosted at the nearby El Camino High School to estimate nighttime noise conditions that could be created at Rio Americano by the proposed project (presented on Draft EIR page 4.2-20). Therefore, the Draft EIR appropriately used nighttime noise data to analyze potential nighttime operational noise effects on wildlife in the nearby American River Parkway. Please see Master Response 2 for additional details regarding the EIR evaluation of operational noise and light impacts on wildlife.

With regard to the commenter's claim that the Draft EIR inappropriately relies on selected rounded 0.00-foot-candle predictions, footcandles are the industry standard unit of measurement for photometric analyses. Draft EIR Impact 4.1-2 appropriately summarizes the results of the Musco Lighting analysis contained in Draft EIR Appendix B, using the appropriate units of measurement.

The commenter's claim that that the Draft EIR "does not meaningfully evaluate the proposed 5700 K spectrum or repeated evening use" is unclear. It appears the commenter has cited to one particular piece of data contained in the Musco Lighting Report (Draft EIR Appendix B), on page 1, which states that the proposed light sources would be LED 5700 K, and the commenter then attempts to argue that because this specific piece of information about the light sources is not mentioned in the impact analysis in Draft EIR Section 4.1, "Aesthetics," that the Draft EIR's nighttime light and glare analysis is somehow deficient. The text

contained in Draft EIR Section 4.1 is not required to repeat verbatim every piece of information contained in the Musco Lighting Report (attached to the Draft EIR as Appendix B). The commenter has made no showing that mentioning a "5700 K spectrum" as the light source would have any effect whatsoever on the impact analysis or the conclusions contained in the Draft EIR. In fact, the "5700 K" light source proposed by Musco Lighting refers to the color "temperature," which was evaluated by Musco Lighting as part of its photometric analysis and is directly reflected in the visual simulations provided in Draft EIR Section 4.1. Furthermore, the number of evenings and times of the year when the proposed stadium lighting would be used are detailed in Draft EIR Table 3-1 (in Chapter 3, "Project Description," page 3-9), and this data forms the basis for the impact analyses contained in all of the Draft EIR topic area sections.

For the reasons stated above, the Draft EIR appropriately evaluates noise, aesthetics, and the amount of nighttime lighting use at Raider Stadium under the proposed project, and therefore no changes to the Draft EIR are required.

Comment I47-9 Response: The commenter's preference for the No Project Alternative (which would be continuation of the current existing conditions, including portable nighttime lighting at Radar Stadium) is noted.

Comment I47-10 Response: Please see response to comment I47-5 with regard to the consistency of the Draft EIR evaluation of operations. In addition, with regard to the maximum operational scenario, Draft EIR Chapter 3, "Project Description," defines the proposed project components and the range of existing and future activity types and scales (i.e., number of attendees that may attend various events) that would occur with implementation of the proposed project. The EIR appropriately evaluates multiple scenarios of operational scales, reflective of the range of activities that would be accommodated by implementation of the proposed project. There is not one maximum operating scenario. Rather, there are existing activities hosted under current conditions at the high school campus – both practices and competitions. The Draft EIR provides a detailed accounting of the existing conditions, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares the existing conditions to what would occur under the proposed project. Relative to a maximum operating scenario, the Draft EIR summarizes conservative assumptions that were used for analysis throughout the document. As noted, due to inadequate sports lighting and capacity, Rio Americano is currently unable to host home football games and graduation ceremonies, which represent the anticipated highest attendance events. While most home football games that could be hosted at Rio Americano high school in the future are not anticipated to be among the highest attendance events, and would be anticipated to draw between 1,100 and 1,700 attendees, while the highest attendance events are conservatively assumed to have an attendance of up to 3,400. Where specific data was not available, such as future levels of attendance, the Draft EIR analysis used conservative assumptions. For example, while the typical home football game based on historical data would have an attendance of between 1,100 and 1,700, the transportation analysis supporting the Draft EIR instead assumed that the typical home football game attendance would be 2,200 (Draft EIR, page 4,4-12). Regarding the commenter's suggestion that a maximum operating scenario should be referenced in every Draft EIR chapter,

for many sections of the Draft EIR, the peak event is not relevant to the impacts. For example, with respect to biological resources, cultural resources, and tribal cultural resources, most impacts would be related to the trenching for electricity, the three-foot-diameter holes for the four new stadium light poles, and the extent of site clearing, and other construction details. The analysis presented in the Draft EIR evaluates not just the periodic higher attendance events at the campus, but also construction-related effects and the more routine use of the facilities in order ensure a comprehensive depiction of both the existing conditions and the incremental impacts of the proposed project. With regard to the commenter's suggestion of an enforceable maximum operating scenario, the District has imposed restrictions, where this is feasible, and where this would be necessary to reduce potentially significant effects of the project – for example, Mitigation Measure 4.3-1b requires evening events to be scheduled to conclude by no later than 10:00 p.m., and prohibits use of the public address system, amplified music, and band activity after 10:00 p.m., except for brief safety- or emergency-related announcements. Mitigation Measure 4.4-3b requires implementation of event transportation management strategies, which would include designation of parking locations and pedestrian routes, staffing and signage to direct attendees, designation of ingress and egress routes, procedures for managing concentrated post-event departures, and adaptive management to adjust as conditions warrant. Feasible mitigation is included for the anticipated period higher attendance activities accommodated by the proposed project. Furthermore, while graduation was originally considered in the development of the proposed project operating scenario to accommodate 3,500 attendees, further discussion and reflection upon available bleacher and field seating resulted in a slight refinement of this maximum event capacity to 3,400; this aligns with the maximum football game attendance scenario and the basis of analysis applied throughout the Draft EIR, including for Transportation, as well as the is within the capacity of the fire and life-safety requirements for design review and approval by DSA. Master Response 10 confirms that 3,400 attendees is the intended estimate and identifies a corresponding correction to Table 3-1 and to Mitigation Measure 4.4-3c to implement this limit, as also reflected in Chapter 3, "Errata," to this Final EIR. The Draft EIR analyzed all potential impacts based on the 3,400 attendee-figure for the purposes of consideration of peak-attendance events, such as graduation, as applicable; therefore, the EIR's analyses and significance determinations remain unchanged and no further revisions are needed apart from the aforementioned minor corrective typographical changes, which are reflected in the Errata contained in Chapter 3 of this Final EIR. For more on the stability of the project description, please also refer to Master Response 10: Project Description. No changes to the Draft EIR outside of the errata items identified in this response herein are necessary, and recirculation is not required.

Comment I47-11 Response: Please see responses to comments I47-2 and I47-3. Please see also Master Response 8: Alternatives. For the reasons explained therein, no changes to the Draft EIR are necessary, and recirculation is not required.

Comment I47-12 Response: The Draft EIR contains complete lighting, noise, parking, and wildlife studies and analyses that clearly explain the methods, assumptions, and results. Please see Draft EIR Section 4.2, "Aesthetics" and Appendix B; Section 4.2, "Biological Resources," and Appendix C; Section 4.3, "Noise and Vibration," and Appendix D; and Section 4.4, "Traffic and Transportation," and Appendix E.

Therefore, no changes to the Draft EIR are necessary, and recirculation is not required.

Comment I47-13 Response: It is unclear as to what operating limits, compliance, violation, and corrective action the commenter is referring, and since the commenter has not provided any details as to what he believes should be included in the Draft EIR, the District cannot respond with specificity. However, in the case that the Draft EIR identified a potentially significant impact, the Draft EIR identifies mitigation to reduce such impact. As summarized in Draft EIR Table 1-1, "Summary of Impacts and Mitigation Measures," all potentially significant impacts are reduced to less than signification with implementation of mitigation, with the exception of noise impacts, which are determined to be significant and unavoidable. Commitment to implementation of each mitigation measure and compliance monitoring is done through the Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if and when the District certifies the EIR. Please see also responses to comment I47-2 through I47-12, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are necessary, and recirculation is not required.

Comment I47-14 Response: The Jesuit High School Lighting Project is included in the project's cumulative impact analyses for all topic areas as shown in Draft EIR Table 7-1, "List of Cumulative Projects" (page 7-2), and as addressed for all topic areas in Chapter 7, which include traffic, parking, and emergency access, as raised by the commenter. See all Master Response 6: Parking Availability, that discusses the analysis that was conducted for the Draft EIR with regard to parking, which included peak scenario events, and Draft EIR Mitigation Measure 4.4-3 (page 4.4-15) that requires the existing verbal Memorandum of Understanding between the two schools to be updated to require that Rio Americano coordinate with Jesuit to ensure that the required off-site parking at Jesuit is available and concurrent peak-attendance at both schools would not occur. Therefore, no changes to the Draft EIR are necessary, and recirculation is not required.

Comment I47-15 Response: Responses to comments contained in Attachment A submitted by the commenter are provided below in responses I47-18 through I47-51. With regards to the commenter's February 2, 2026 scoping letter, that letter was received by the District, the comments contained therein were considered during preparation of the Draft EIR, and a copy of the commenter's February 2, 2026 letter was included in Draft EIR Appendix A. The commenter's letters and all attachments have been included in the administrative record, and responses to comments I47-1 through I47-51 provide separate, good-faith, reasoned responses to each numbered comment.

Comment I47-16 Response: For the reasons stated above in responses to comment I47-1 through I47-14, the Draft EIR does not contain any deficiencies, no changes to the Draft EIR are necessary, and therefore recirculation is not required.

Comment I47-17 Response: CEQA provides that a lead agency (in this case, San Juan Unified School District) may approve a project even where an EIR finds there may be significant and unavoidable impacts. Public Resources Code Section 21081 and the State CEQA Guidelines Section 15093 require the decision-making agency to balance,

as applicable, the economic, legal, social, technological, or other benefits, including region-wide or statewide environmental benefits, of a proposed project against its unavoidable environmental risks when determining whether to approve the project. In this event, as required by the State CEQA Guidelines Section 15093, if the District is to approve the EIR and adopt the proposed project, the District must prepare a Statement of Overriding Conditions providing the specific reasons to support its action based on the FEIR and/or other information in the record.

The analysis contained in the Draft EIR is thorough, complete, and adequate, and all feasible mitigation measures have been included (where appropriate) to reduce the project's potentially significant and significant impacts. The Draft EIR also includes an appropriate analysis of alternatives as required by CEQA (please see Master Response 8: Alternatives). The commenter's opposition to the proposed project is noted.

Comment I47-18 Response: Responses to each comment in Attachment A are presented in responses I47-19 through I47-51.

Comment I47-19 Response: The information presented in Draft EIR Chapter 3, "Project Description," regarding the times when nighttime events at Raider Stadium are likely to conclude is based on District records from previous games, and Rio Americano nighttime football games held at El Camino High School. For more on the project description and how it conforms to CEQA's requirements, please see Master Response 10: Project Description. The commenter is correct that this information does not constitute "enforceable limits," nor is the District required to do so, as the total duration of football games is not strictly limited by any league or District policy. As noted in the Draft EIR, for example, if overtime play is required for football games, they will conclude slightly later in the evening, though, as required by Mitigation Measure 4.3-1b, evening events shall be scheduled to conclude by no later than 10:00 p.m., and if due to overtime play 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 safety- or emergency-related announcements. As another example, the times for nighttime games listed in Draft EIR Table 3-1 include estimates as to how long it will take for attendees to leave the stadium; it is not possible for the District to establish a "binding limit" on "exactly" how long it will take for every football game to conclude, or "exactly" how long it will take spectators to leave the bleachers and sidelines. The District has provided conservative estimates based on the best available data in Draft EIR Chapter 3 regarding future anticipated stadium use and the estimated times when games will conclude and how long it is estimated to take for attendees to leave the stadium; however, this information necessarily must be estimated (see Draft EIR pages 3-6 through 3-9). The commenter has not cited any case, statute, regulation, or other authority that would require the District to place a finite limit on the number of evening events to be held each year were the project to be completed. Also, Draft EIR Chapter 3 states that the stadium will not be used for other community events.

With regard to the purported "inconsistencies" in the number of events and the projected attendance levels listed in the Project Description (Draft EIR Table 3-1, page 3-9) and the information stated in the aesthetics, noise, and transportation

sections of the Draft EIR, the commenter presents the information out of context. The commenter's statement that the Draft EIR noise section evaluates "13 new events" (page 4.3-18) is part of a discussion encompassing several pages that acknowledges both the number of existing practices and games at Raider Stadium (listed in Draft EIR Table 3-1) as well as the number of additional events that are expected to occur over and above existing conditions following installation of the new permanent lighting (which is also reflected in Draft EIR Table 3-1). Thus, there is no inconsistency. The commenter's statement that the aesthetics analysis relies on 40 nighttime event days and as many as 88 practice days (Draft EIR page 4.1-20) is consistent with the information presented in Table 3-1. Contrary to the commenter's assertion, the Draft EIR does not say that only 1,400 people would attend the Rio Americano High School graduation ceremony (and the commenter does not provide any specific section or page number where this was stated). The commenter's assertion that the Draft EIR transportation analysis analyzes 3,400 attendees although the new bleachers hold approximately 2,575, is correct. As stated in the *Local Transportation Analysis* prepared by Kimley Horn (2026) and attached to the Draft EIR as Appendix E, 3,400 people represents the maximum observed home game attendance from the past two years. As such, a scenario including this attendance level is conservative (would tend to overestimate the typical activity levels) and might be expected to occur once per year during Rio Americano High School's "rivalry game" against nearby Jesuit High School. Therefore, the traffic analysis includes both a "general event" of average home football game attendance, and a "conservative event" scenario aligning with peak attendance for an event like the Jesuit High School football game (Draft EIR Appendix E pages 3 and 4; Draft EIR Section 4.4, "Traffic and Transportation," pages 4.4-1, 4.4-10, 4.4-13). As stated on Draft EIR page 4.4-10, "[t]he 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." If that many people were to attend the once yearly Rio Americano vs. Jesuit football game, the people in excess of the bleacher seating capacity would be required to stand along the sidelines and the endzones. For the reasons explained above, the Draft EIR does not contain any inconsistencies, and no changes to the Draft EIR are required.

Comment I47-20 Response: Please see response to comment I47-19. Draft EIR Chapter 3 contains a finite, stable project description which has been used consistently throughout all of the topic area analyses contained in the Draft EIR. Therefore, the changes to the Draft EIR requested by the commenter are not necessary, and no re-analysis is required.

Comment I47-21 Response: As discussed in detail in Draft EIR Chapter 6, "Alternatives," on pages 6-3 and 6-4, construction of a new off-campus stadium could result in the same significant and unavoidable noise impacts, but for a different set of residences in a different location, as well as other additional and potentially more severe environmental effects than those identified for the proposed project. Morning

scheduling for athletic games or practices would conflict with the students' required schooling. Use of other existing stadiums is already occurring under existing conditions (i.e., Rio Americano games are currently held at El Camino High School). Therefore, these alternatives would either result in the same or more significant impacts on the environment, are not feasible, or are substantially similar to existing conditions, and thus they were not carried forward for more detailed analysis. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I47-22 Response: A no permanent lighting, reduced height/illumination (in the form of portable diesel-power lights), and reduced capacity alternative is included in the Draft EIR as the No Project Alternative, which is described on Draft EIR pages 6-4 and 6-5, and evaluated on Draft EIR pages 6-6 through 6-17. An earlier curfew alternative would not meet the project purpose and need. The project objectives include the District's intent to "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; 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" (Draft EIR, page 6-3). Creating an earlier cutoff point for the use of Rio Americano's facilities would not allow scheduling of practices and competitions outside of the normal classroom instruction times of the day or scheduling of events during cooler parts of the day. Regarding reduced height or illumination, the height of the lighting standards allows the light to be focused specifically on the field of play and avoid any light trespass or glare that could affect off-site areas. Regarding a reduction in illumination, the lighting design employs the best practices and technology available to avoid light trespass and glare. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I47-23 Response: Please see response to comment I47-22 and Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I47-24 Response: Mitigation Measure 4.1-2 (Draft EIR page 4.1-26) requires the District to 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. Since publication of the Draft EIR, the District submitted the proposed lighting design to the DarkSky International Association and, as provided in Attachment B to this FEIR, the proposed lighting system received a "pass" rating. There is no "requirement" at any school for "post-installation field certification" related to lighting, and since the appropriate modeling has been performed by Musco Lighting and the required DarkSky "pass" rating has been obtained, there is no reason to require any type of "certification" post construction. The proposed project has been designed to reduce light spill and glare, as well as manage high angle light pollution to minimize offsite light trespass and sky glow

Comment I47-25 Response: There is no "requirement" at any school for "post-installation field certification" related to lighting, and since the appropriate modeling has been performed by Musco Lighting and the required DarkSky "pass" rating has been obtained, there is no reason to require any type of "certification" post

construction. The proposed project has been designed to reduce light spill and glare, as well as manage high angle light pollution to minimize offsite light trespass and sky glow.

Comment I47-26 Response: Please see responses to Comments O4-21 and O4-60.

Comment I47-27 Response: Please see responses to Comments O4-21 and O4-60.

Comment I47-28 Response: Please see responses to Comments O4-21 and O4-60.

Comment I47-29 Response: Please see response to Comment O4-61. The Project Description (page 3-8) establishes that 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 lights would be used as designed and there is no reason to assume that they would be left on when not in use. The Draft EIR evaluation does not hinge upon reduced lighting modes. The CEQA does not require mitigation for impacts determined to be less than significant (CEQA Guidelines §15126.4(a)(3)). Since the Draft EIR concludes that construction-related air quality impacts are less than significant, additional mitigation measures are not warranted.

Comment I47-30 Response: The commenter correctly notes that the proposed project would include installation of four 80-foot poles, enlarged bleachers, and a press box approximately 30 feet above grade. However, Draft EIR Section 4.1, "Aesthetics," explains that 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 flood control levee. Views of the project site from the Parkway, including from the Jedediah Smith Memorial Trail, are blocked by the elevated levee as shown in Photo Viewpoint KOP-7 (page 4.1-8). The proposed light standards would be installed approximately 225–460 feet north of the Jedediah Smith Memorial Trail (at the closest points) contained within the Parkway. Due to the intervening tall evergreen trees along the back side of the campus property (shown in KOP-7) and the height of flood control levee, and considering 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 and above the levee) to recreationists looking upwards and northwards from the Parkway. 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 Draft EIR correctly concludes that 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 (Draft EIR page 4.1-18). As noted on Draft EIR page 4.1-18, the Parkway is closed to all use after sundown; therefore, although visual simulations were included showing the effect of the stadium lights at dusk and after dark (visual simulations 2a and 3b, Draft EIR pages 4.1-21 and 4.1-22), there is no potential degradation of visual character or quality from the Parkway after dark

because no people will be (nor are allowed to be) present. Because the levee crown referenced by the commenter is a gated access road installed by the U.S. Army Corps of Engineers that is intended for use by levee maintenance vehicles and is not part of the American River Parkway, a visual simulation showing the proposed stadium improvements from the levee maintenance road is not required.

As stated on Draft EIR page 4.1-22, 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* (2004) 119 Cal.App.4th 477, 493 [upholding city's position that private views were not protected and therefore not required to be considered for adequate aesthetic impact analysis].). Therefore, although the District elected to provide a comparison of nighttime lighting changes from the surrounding private residences on Draft EIR pages 4.1-22 through 4.1-25, the District cannot be compelled to provide such an analysis, or to provide any visual simulations related to such an analysis. (*Mira Mar Mobile Community v. City of Oceanside* (2004) 119 Cal.App.4th 477, 492-494.) In fact, the District did provide three visual simulations (labelled 3a, 3b, and 4, on Draft EIR pages 4.1-23 and 4.1-24) that provide representations of the effects of the proposed nighttime lighting from residences east of the project site. Furthermore, it would not be possible for the District to provide visual simulations from the backyards of nearby residences, as suggested by the commenter, because those residences constitute private property to which the District does not have access.

The fact that the commenter disagrees with the results of the Musco Lighting Analysis (Draft EIR Appendix B) and the associated summary text, conclusions, and mitigation measures in the Draft EIR (Impact 4.1-2, pages 4.1-18 through 4.1-26) is noted. Please see Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors.

The Draft EIR includes an analysis of the physical change in aesthetics from sensitive public viewpoints (and although it is not required to do so, the Draft EIR also includes an analysis of the visual change from nearby private residences). Appropriate visual simulations are included in the Draft EIR. For the reasons stated above, no changes to the Draft EIR are required.

Comment I47-31 Response: CEQA requires that an EIR provide a good-faith effort at full disclosure and use reasonable methods, supported by substantial evidence, to evaluate potential environmental effects (CEQA Guidelines §§15144, 15151). CEQA does not require speculative or infeasible analyses, nor does it require data that cannot reasonably be obtained (CEQA Guidelines §15144; Laurel Heights Improvement Assn. v. Regents of Univ. of California (1988) 47 Cal.3d 376, 404–405). Use of surrogate or analogous sites is an accepted and common practice when project-specific data are unavailable or when the project site cannot accommodate the activity being analyzed.

Rio Americano High School currently lacks a home stadium capable of hosting varsity football games; such events are typically held at El Camino High School. Because it is not possible to conduct site-specific noise monitoring for a varsity football game at Rio Americano, the EIR reasonably relied on reference measurements from a comparable event at El Camino High School, which reflects the actual conditions and crowd sizes expected for the project. The

analysis conservatively applied standard acoustic modeling techniques, including distance attenuation, to account for differences in geometry and receptor proximity. Where the proposed stadium would be closer to sensitive receptors, the analysis adjusted for these distances to ensure a conservative estimate of potential impacts. The Draft EIR acknowledges the use of a surrogate site (Draft EIR Page 4.3-14). The analysis applies standard point-source attenuation and considers distributed sources (crowd, band, speakers, parking, travel routes), providing a reasonable and conservative estimate of noise exposure at the nearest residences. The EIR concludes that, even with these conservative assumptions, operational stadium-event noise would remain significant and unavoidable—thus disclosing the worst-case scenario and meeting CEQA's disclosure requirements.

Comment I47-32 Response: See response to Comment I47-31. The District acknowledges the importance of a transparent and reproducible noise analysis. As explained in the Draft EIR (pages 4.3-18 through 4.3-24), the operational noise analysis was based on representative, worst-case events using actual measurements from a varsity football game at El Camino High School—the current location for such events due to the absence of a home stadium at Rio Americano High School. The analysis accounted for all relevant noise sources identified by the commenter, including speaker locations, bleachers, ramps, press box, parking areas, and travel routes. Barriers and topography were not credited with any noise reduction in the analysis because the proposed project site has limited existing or planned noise-attenuating features. This approach provides a conservative, worst-case scenario that likely overstates potential impacts, ensuring that significant effects are not understated. CEQA does not require speculative or infeasible analyses when site-specific data cannot reasonably be obtained (CEQA Guidelines §§15144, 15151; Laurel Heights Improvement Assn. v. Regents of Univ. of California (1988) 47 Cal.3d 376). The use of a surrogate site is an accepted and reasonable method under CEQA when the project site cannot accommodate the activity being analyzed (City of Long Beach v. Los Angeles Unified School Dist. (2009) 176 Cal.App.4th 889). The EIR's methodology and assumptions are fully disclosed, and the analysis conservatively models all major noise sources, ensuring that the impact determination is robust and protective of nearby receptors.

Comment I47-33 Response: Limiting total event noise, including crowd noise and bleacher noise is not feasible. The commenter is incorrect that Mitigation Measure 4.3-1b only limits public address system noise. As detailed in Draft EIR pages 4.3-25 through 4.3-26, Mitigation Measure 4.3-1b also identifies time limits for amplified music and band activity, prohibits artificial noisemakers, includes signage and announcements to manage crowd departure noise, and requires bleacher noise reducing design features. Sound limits, as identified in Mitigation Measure 4.3-1b are measurable and feasible to control. However, additional monitoring and corrective action, outside of those items identified in Mitigation Measure 4.3-1b such as artificial noisemaker prohibition, would be infeasible; for example, it is not realistic for the District to suggest that it could feasibly avoid any bleacher noise, crowd cheering, or similar noise sources and, therefore, has not suggested such in the proposed mitigation. For these reasons, and as disclosed in the Draft EIR (page 4.3-27) Impact 4.3-1 is found to be significant and unavoidable. Should the District certify the Final EIR and approve the project, in accordance with California Public Resources Code Section 21081.6, the Environmental

Mitigation Monitoring and Reporting Program prepared in conjunction with this Final EIR provides for the monitoring of mitigation measures, including Mitigation Measure 4.3-1b, as set forth in this Final EIR. The intent of the Mitigation Monitoring and Reporting Program is to ensure the effective implementation and enforcement of adopted mitigation measures, as suggested by the commenter and consistent with requirements of CEQA Guidelines Section 15126.4 subd. [a][1][B].

Comment I47-34 Response: The suggested measures, such as setting numeric event noise limits, requiring pre-opening nighttime commissioning, ongoing monitoring, complaint protocols, and mandatory operational reductions, would not reduce the impact to less than significant, as the primary source of noise is the nature and scale of the event itself. In addition, many of the suggested measures (e.g., reducing attendance or prohibiting band activity) would fundamentally alter the project's purpose and are not considered feasible mitigation under CEQA (See Master Response 8: Alternatives).

Comment I47-35 Response: This comment correctly summarized the information presented in Draft EIR Section 4.4, "Traffic and Transportation," and Section 4.3, "Noise and Vibration," along with Draft EIR Appendix E

Comment I47-36 Response: Please see response to comment I47-7 and Master Response 6: Parking Availability. The analysis requested by the commenter is contained in Draft EIR Section 4.3, "Noise and Vibration," Impact 4.3-1 (Draft EIR pages 4.3-19 and 4.3-20), which includes both on-site and off-site parking noise. No changes to the Draft EIR are required.

Comment I47-37 Response: The case cited by the commenter is not applicable to the proposed project, for several reasons. First, the San Diego Unified School District (San Diego District) prepared an Initial Study, rather than EIR, for its project to add stadium lighting at the existing Hoover High School. The plaintiffs argued that under CEQA's "fair argument standard," an EIR should have been prepared for that project, to which the Court ultimately agreed. However, in the case of the proposed project, the San Juan Unified School District has prepared an EIR which thoroughly evaluates the potential environmental impacts of the proposed project regarding all topic areas, including parking. An EIR is not subject to the "fair argument standard" but is instead subject to the "substantial evidence" test, which is deferential to an agency's analytical conclusions where those are supported by substantial evidence, which the District's analysis is here. In this case, the commenter has provided no evidence of any kind, and instead relies on argument and speculation.

Second, the Hoover High School, which was the subject of the court case referenced by the commenter, was located in downtown San Diego, in an area where residents demonstrated that parking in the evening hours was already difficult to obtain because there was already an insufficient supply of on-street parking, which the residents themselves needed for their own parking. Furthermore, the parking "analysis" in the Initial Study (prepared by a consultant for the San Diego District) did not make any attempt to ascertain the total number of off-site, street parking spaces in the immediate area, nor was there any attempt made to ascertain the number of available off-site, street parking spaces during

the Friday evening time period when the off-site street parking would be needed for the high school. The Court stated that the record included extensive evidence (e.g., letters and photographs) from residents in the area showing the San Diego District project may have an adverse effect on local on-street parking. For those reasons, the Court required the San Diego District to prepare an EIR, and to provide physical evidence (in the form of photographs) that the necessary street parking would be available. In the case of the Rio Americano High School project, however, the high school campus is not situated in a downtown area; instead, the campus is situated in a suburban area comprised of single-family residences on large lots, where sufficient parking for residents is available in their garages and driveways and where public streets provide publicly available on-street parking. Unlike the court case cited by the commenter, the parking analysis for the proposed project, contained in Draft EIR Appendix E prepared by Kimley Horn (2026), did in fact ascertain the total number of off-site street parking spaces in the immediate area, including the number of available off-site street parking spaces during the Friday evening time period when the off-site street parking would be needed for the Rio Americano High School.

Finally, off-site on-street parking along local residential streets is permitted under County Code Chapter 10.30, and, therefore, during the evenings, weekends, or holidays, non-resident vehicles (such as attendees at the nearby Rio Americano High School stadium) may be parked on the street in front of the residences.

The Draft EIR does not treat the on-street parking as mitigation. The Draft EIR discloses that on-street parking is available to all, provides a map showing the exact locations, and explains the methodology for calculating the number of spaces (see Master Response 6: Parking Availability, for details). The Draft EIR has demonstrated that the on-street parking would be available when needed for use by attendees at the Rio Americano High School stadium, and the commenter provides no evidence to the contrary.

Comment I47-38 Response: Please see responses to comments I47-7, I47-38, and Master Response 6: Parking Availability. For the reasons stated therein, no further analysis is necessary and no changes to the Draft EIR are required.

Comment 147-39 Response: As explained in the Local Transportation Analysis (page 15 of 20), "…the 327 street parking spaces would not be sufficient to accommodate the 623 vehicles in excess of the existing on-campus parking supply. Table 17 shows a remaining deficit of 296 parking spaces. In this instance, it is understood that a conservative event scenario would require coordination between Rio Americano High School and Jesuit High School to utilize parking on the Jesuit High School campus consistent with the terms of their existing MOU." The reference to a parking "surplus" in Table 17 was a typographical error in which the "296" spaces is intended to be "-296"; this error is updated Chapter 3, "Errata," of this Final EIR. Furthermore, the analysis in Draft EIR Chapter 4.4, "Transportation and Circulation," correctly identifies that "there would be an estimated residual demand of approximately 296 spaces (or 271 when accounting for the 25 on-site electric-vehicle-designated spaces) under the conservatively high event attendance scenario." Please see also Master Response 6: Parking Availability. For the reasons stated therein, and because the Draft EIR appropriately identified for the deficit of 296 parking spaces under the peak-event conservative scenario,

the edit to the Local Transportation Analysis Table 17 in this FEIR Errata does not affect the Draft EIR evaluation and no further analysis is necessary.

Comment I47-40 Response: Though not all mitigation measures, to be valid, need to include performance standards, such standards are necessary where many of the crucial details for a mitigation plan are deferred until after project approval. "Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure" (CEQA Guidelines Section 15126.4, subd. [a][1][B]).

The inconvenience of parking is not itself an environmental impact under CEQA. (See *Save Our Access etc. v. Watershed Conservation Auth.* (2021) 68 Cal.App.5th 8, 24–25; *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 697.) Parking availability is an indicator of the use of off-site parking, such as available street parking, that may occur under various operational conditions (i.e., lower versus higher attended events); such use of street parking is considered under CEQA and in the Draft EIR in order to evaluate the potential for conflicts among pedestrians and motor vehicles and related safety. The Draft EIR identified this as a potentially significant impact, and proposed Mitigation Measures 4.4-3a: Update the Memorandum of Understanding with Jesuit High School for Shared Parking Use Agreement, Mitigation Measure 4.4-3b: Implement an Event Transportation Management Plan, and Mitigation Measure 4.4-3c: High-Capacity Event Access and Circulation Management (Draft EIR pages 4.4-15 and 4.4-16). The mitigation measures throughout the Draft EIR, including Mitigation Measures 4.4-3a through 4.4-3c, include appropriate performance standards and identify the types of potential actions that can feasibly achieve such standards. Should the District certify the Final EIR and approve the project, in accordance with California Public Resources Code Section 21081.6, the Environmental Mitigation Monitoring and Reporting Program prepared in conjunction with this Final EIR provides for the monitoring of mitigation measures, including Mitigation Measures 4.4-3a through 4.4-3c, as set forth in this Final EIR. The intent of the Mitigation Monitoring and Reporting Program is to ensure the effective implementation and enforcement of adopted mitigation measures, as suggested by the commenter and consistent with requirements of CEQA Guidelines Section 15126.4 subd. [a][1][B]. This is a well-accepted practice under CEQA. (See *City of Hayward v. Trustees of Cal. State University* (2015) 242 Cal.App.4th 833, 854–855 [traffic plan that allowed agency to monitor and adapt program upheld as valid mitigation because it enumerated specific measures for evaluation, incorporated quantitative criteria and deadlines, and included a monitoring program; holding that "[d]eferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed, and possibly incorporated in the mitigation plan"].)

Comment I47-41 Response: Please see Master Response 2 regarding analysis of operational noise impacts on biological resources. Please see response to Comment O2-26 regarding an update to the impact determination for potential lighting impacts on native wildlife movement. See page 4.2-25 of Chapter 3, "Errata" of this Final EIR for associated revisions to text.

Comment I47-42 Response: The illuminance (i.e., footcandle) values presented in the evaluation of operational lighting impacts to biological resources in Impact 4.2-1 (pages 4.2-17 through 4.2-24) were obtained from the Lighting Report by Musco Lighting in Appendix B of the Draft EIR, and are based on those at the nearest suitable habitat to the project site. The significant digits in the Lighting Report are standard for this type of analysis. Please see Master Response 2 for additional detail regarding analysis of operational light impacts on biological resources. Operational light impacts would not reach the riparian habitat in the Parkway identified as having less-than-significant noise impacts, as indicated in Impact 4.2-1.

Comment I47-43 Response: The evaluation of operational impacts to biological resources in Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27) considers all new stadium events. Football practices and some other stadium uses occur under existing (baseline) conditions and would result in no new impacts on biological resources. The Draft EIR analysis recognizes that not all new events would occur outside the sensitive life stages of special-status species (p. 4.2-21). No changes to the Draft EIR are required.

Comment I47-44 Response: Please see Master Response 2 regarding analysis of operational light and noise impacts on biological resources. Please see response to Comment O2-26 regarding an update to the impact determination for potential lighting impacts on native wildlife movement. See page 4.2-25 of Chapter 3, "Errata" of this Final EIR for associated revisions to text. The project has incorporated shielded and directional lighting sources and noise and schedule restrictions in Mitigation Measure 4.3-1b, and additional monitoring and mitigation measures are not required for less-than-significant impacts on biological resources.

Comment I47-45 Response: Please see Master Response 9: Cumulative Impacts and response to Comment O4-24.

Comment I47-46 Response: Please see Master Response 9: Cumulative Impacts.

Comment I47-47 Response: See Response to Comments I47-48 and I47-48 with regard to the enforceability and identified performance standards and monitoring, as applicable, of Draft EIR proposed mitigation measures, and how proposed mitigation measures appropriately support the significance findings of the Draft EIR for each applicable resource area.

Comment I47-48 Response: Mitigation Measure 4.1-2 (Draft EIR page 4.1-26) requires the District to 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. Since publication of the Draft EIR, the District submitted the

proposed lighting design to the DarkSky International Association and, as provided in Attachment B to this FEIR, the proposed lighting system received a "pass" rating.

Comment I47-49 Response: Please see Master Response 4: Mitigation.

Comment I47-50 Response: For the reasons stated in responses to comment I47-2 through I47-49, mitigation measures contained in the Draft EIR are not inappropriately deferred, no additional alternatives are required to be analyzed, and there is no new significant information that requires inclusion in the Draft EIR; therefore, recirculation is not required.

COMMENT LETTER I48. JANICE KELLEY; OCTOBER 15, 2026

Response to Comment Letter I48. Janice Kelley

Comment I48-1 Response: This comment letter (I48), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record.

Comment I48-2 Response: Please see response to comment I1-1.

Comment I48-3 Response: Please see response to comment I1-2.

Comment I48-4 Response: Please see response to comment I1-3.

Comment I48-5 Response: Please see response to comment I1-4.

Comment I48-6 Response: Please see response to comment I1-5.

Comment I48-7 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I48-8 Response: The commenter has provided no evidence to substantiate her opinion that the proposed project would constitute a "safety hazard." Draft EIR Section 4.2, "Biological Resources," thoroughly evaluates the project's potential impacts on wildlife in the Parkway.

Comment I48-9 Response: Please see responses to comments I1-6 and I1-7.

Comment I48-10 Response: Please see response to comment I1-8.

Comment I48-11 Response: Please see response to comment I1-9.

Comment I48-12 Response: Please see responses to comments I1-10 and I1-11.

Comment I48-13 Response: Please see response to comment I1-12.

Comment I48-14 Response: Please see response to comment I1-13.

Comment I48-15 Response: Please see response to comment I1-14.

Comment I48-16 Response: Please see response to comment I1-15.

COMMENT LETTER I49. JOHN KILTED; OCTOBER 14, 2026

Response to Comment Letter I49. John Kilted

Comment I49-1 Response: Please see response to comment I1-1.

Comment I49-2 Response: Please see response to comment I1-2.

Comment I49-3 Response: Please see response to comment I1-3.

Comment I49-4 Response: Please see response to comment I1-4.

Comment I49-5 Response: Please see response to comment I1-5.

Comment I49-6 Response: Please see response to comment I1-6.

Comment I49-7 Response: Please see response to comment I1-7.

Comment I49-8 Response: Please see response to comment I1-8.

Comment I49-9 Response: Please see response to comment I1-9.

Comment I49-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I49-11 Response: Please see response to comment I1-12.

Comment I49-12 Response: Please see response to comment I1-13.

Comment I49-13 Response: Please see response to comment I1-14 .

Comment I49-14 Response: Please see response to comment I1-15.

COMMENT LETTER I50. NANCY KNISKERN; OCTOBER 16, 2026

Response to Comment Letter I50. Nancy Kniskern

Comment I50-1 Response: Responses to individual comments are provided in I50-2 through I50-19.

Comment I50-2 Response: Please see response to comment I1-1.

Comment I50-3 Response: The commenter's opposition to the proposed project is noted.

Comment I50-4 Response: The purpose of CEQA is to disclose the potential physical environmental impacts of a project so that lead agencies can make decisions with environmental consequences in mind. The Draft EIR provides a thorough and complete analysis of the project's potential physical impacts on the environment. No changes to the Draft EIR are required.

Comment I50-5 Response: The mitigation measure the commenter refers to, Mitigation Measure 5.2-1 (Draft EIR pages 5.2-3 through 5.2-4) is not specific to only transportation routes, but rather requires application of water twice per day on exposed surfaces, which include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads. As described in Draft EIR Chapter 3, "Project Description", 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. American River Drive, Saverien Drive, and the fire access lane are paved; therefore, vehicles accessing the project site would not travel on "dusty, dirt filled routes" as cited by the commenter. As shown in Table 5.2-1 (Draft EIR page 5.2-5), maximum daily unmitigated PM_{10} emissions are estimated to be approximately 2 pounds per day, well below the Sacramento Metropolitan Air Quality Management District recommended threshold of significance of 80 pounds per day. Fugitive dust emissions of PM10 generated by vehicles on paved roads would be approximately 0.7 pounds per day as shown in Draft EIR Appendix G for maximum daily worker, vendor, and haul vehicle emissions on the maximum day of overlapping activities. Additionally, project construction would primarily be conducted on existing paved areas and ground disturbing activities that could generate fugitive dust emissions would be limited.

Additionally, as described in Impact 5.2-3, temporary construction activities would result in less than significant impacts related to exposure of sensitive receptors to toxic air contaminant concentrations due to the intermittent and short-term generation of emissions during construction, as well as the dispersive nature of PM2.5 emissions. As described on Draft EIR page 5.2-10, 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.

Therefore, the commenter's concerns about particulate matter emissions are appropriately addressed and no changes to the Draft EIR are required.

Comment I50-6 Response: Draft EIR Section 5.6, "Greenhouse Gas Emissions", contains an evaluation of greenhouse gas emissions generated by Project construction and

operations, including estimates of construction-related GHG emissions inclusive of off-road equipment and large vehicles. As shown in Draft EIR Section 5.6, the Project would result in less than significant impacts related to greenhouse gas emissions. No changes to the Draft EIR are required.

Comment I50-7 Response: The commenter's concerns related to soil compaction are noted. However, as discussed in Draft EIR Section 5.8, "Hydrology and Water Quality" (pages 5.8-27 and 5.8-28) 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 area that would be disturbed, soil compaction would not occur; thus, there would be no impact, and no mitigation measures are required.

Comment I50-8 Response: Draft EIR Section 4.3, "Noise and Vibration," contains a thorough and complete analysis of the project's potential noise impacts on nearby sensitive receptors (including residences and recreationists in the Parkway). Noise impacts on wildlife in the Parkway are appropriately evaluated in Draft EIR Impact 4.2-1 (pages 4.2-20 and 4.2-21). No changes to the Draft EIR are required.

Comment I50-9 Response: Noise impacts on wildlife in the Parkway are appropriately evaluated in Draft EIR Impact 4.2-1 (pages 4.2-20 and 4.2-21). No changes to the Draft EIR are required.

Comment I50-10 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I50-12 Response: Please see responses to comments I50-5, I50-6, I50-7, and I1-1.

Comment I50-12 Response: Raider Stadium, and the additional events at the stadium that would be enabled by the proposed lighting, is not intended to "support all the athletics provided in the high school – swimming, gymnastics, basketball, tennis, volleyball" as stated by the commenter. These sports mentioned by the commenter are accommodated at other facilities currently on the Rio Americano High School campus, and would remain at those facilities after implementation of the proposed project. Please see also response to comment I1-5.

Comment I50-13 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I50-14 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I50-15 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I50-16 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I50-17 Response: Please see responses to comments I50-2 through I50-16.

Comment I50-18 Response: Because the proposed project is confined to the existing Rio Americano High School campus, there is no potential for degradation of riparian habitat in the Parkway, which begins approximately 100 feet from the southernmost boundary of the school campus and is separated from the project site by the elevated American River north bank flood control levee (please see Draft EIR Impact 4.2-2 (page 4.2-24).

Comment I50-19 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I51. LAURA LANGHAM; OCTOBER 14, 2026

Response to Comment Letter I51. Laura Langham

Comment I51-1 Response: Please see response to comment I1-1.

Comment I51-2 Response: Please see response to comment I1-2.

Comment I51-3 Response: Please see response to comment I1-3.

Comment I51-4 Response: Please see response to comment I1-4.

Comment I51-5 Response: Please see response to comment I1-5.

Comment I51-6 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I51-7 Response: Please see response to comment I1-9.

Comment I51-8 Response: Please see responses to comments I1-10 and I1-11.

Comment I51-9 Response: Please see response to comment I1-12.

Comment I51-10 Response: Please see response to comment I1-13.

Comment I51-11 Response: Please see response to comment I1-14.

Comment I51-12 Response: Please see response to comment I1-15.

COMMENT LETTER I52. LINDA LARSON; OCTOBER 14, 2026

Response to Comment Letter I52. Linda Larson

Comment I52-1 Response: Please see response to comment I1-1.

Comment I52-2 Response: Please see response to comment I1-2.

Comment I52-3 Response: Please see response to comment I1-3.

Comment I52-4 Response: Please see response to comment I1-4.

Comment I52-5 Response: Please see response to comment I1-5.

Comment I52-6 Response: Please see response to comment I1-6.

Comment I52-7 Response: Please see response to comment I1-7.

Comment I52-8 Response: Please see response to comment I1-8.

Comment I52-9 Response: Please see response to comment I1-9.

Comment I52-10 Response: Please see response to comment I1-10.

Comment I52-11 Response: Please see response to comment I1-11.

Comment I52-12 Response: Please see response to comment I1-12.

Comment I52-13 Response: Please see response to comment I1-13.

Comment I52-14 Response: Please see response to comment I1-14.

Comment I52-15 Response: Please see response to comment I1-15.

COMMENT LETTER I53. CATHIE LAZIER; OCTOBER 14. 2026

Response to Comment Letter I53. Cathie LaZier

Comment I53-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I53-2 Response: Please see response to comment I1-2.

Comment I53-3 Response: Please see response to comment I1-3.

Comment I53-4 Response: Please see response to comment I1-4.

Comment I53-5 Response: Please see response to comment I1-5.

Comment I53-6 Response: Please see response to comment I1-6.

Comment I53-7 Response: Please see response to comment I1-7.

Comment I53-8 Response: Please see response to comment I1-8.

Comment I53-9 Response: Please see response to comment I1-9.

Comment I53-10 Response: Please see response to comment I1-10.

Comment I53-11 Response: Please see response to comment I1-11.

Comment I53-12 Response: Please see response to comment I1-12.

Comment I53-13 Response: Please see response to comment I1-13.

Comment I53-14 Response: Please see response to comment I1-14.

Comment I53-15 Response: Please see response to comment I1-15.

Comment I53-16 Response: Please see response to comment I1-15.

COMMENT LETTER I54. GREGORY LEAFE; SEPTEMBER 29, 2026

Response to Comment Letter I54. Gregory Leafe

Comment I54-1 Response: Please see response to comment I1-1.

Comment I54-2 Response: Please see response to comment I1-2.

Comment I54-3 Response: Please see response to comment I1-3.

Comment I54-4 Response: Please see response to comment I1-4.

Comment I54-5 Response: Please see response to comment I1-5.

Comment I54-6 Response: Please see response to comment I1-6.

Comment I54-7 Response: Please see response to comment I1-7.

Comment I54-8 Response: Please see response to comment I1-8.

Comment I54-9 Response: Please see response to comment I1-9.

Comment I54-10 Response: Please see response to comment I1-10.

Comment I54-11 Response: Please see response to comment I1-11.

Comment I54-12 Response: Please see response to comment I1-12.

Comment I54-13 Response: Please see response to comment I1-13.

Comment I54-14 Response: Please see response to comment I1-14.

Comment I54-15 Response: With regards to parking and traffic, please see response to comment I1-15 and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation. The project's potential impacts related to air quality, including traffic-related air quality, are evaluated in Draft EIR Section 5.2, "Air Quality."

COMMENT LETTER I55. MICHAEL LEAON; OCTOBER 16, 2026

Response to Comment Letter I55. Michael Leaon

Comment I55-15 Response: Responses to individual comments are provided in I55-2 through I55-14.

Comment I55-15 Response: Please see response to comment I1-1.

Comment I55-15 Response: Please see response to comment I1-2.

Comment I55-15 Response: Please see response to comment I1-3.

Comment I55-15 Response: Please see response to comment I1-4.

Comment I55-15 Response: Please see response to comment I1-5.

Comment I55-15 Response: Please see responses to comments I1-6 and I1-7.

Comment I55-15 Response: Please see response to comment I1-8.

Comment I55-15 Response: Please see response to comment I1-9.

Comment I55-15 Response: Please see responses to comments I1-10 and I1-11.

Comment I55-15 Response: Please see response to comment I1-12.

Comment I55-15 Response: Please see response to comment I1-13.

Comment I55-15 Response: Please see response to comment I1-14.

Comment I55-15 Response: Please see response to comment I1-15.

COMMENT LETTER I56. MARYA LIBERTY; OCTOBER 16, 2026

Response to Comment Letter I56. Marya Liberty

Comment I56-15 Response: Please see response to comment I1-1.

Comment I56-15 Response: Please see response to comment I1-2.

Comment I56-15 Response: Please see response to comment I1-3.

Comment I56-15 Response: Please see response to comment I1-4.

Comment I56-15 Response: Please see response to comment I1-5.

Comment I56-15 Response: Please see responses to comments I1-6 and I1-7.

Comment I56-15 Response: Please see response to comment I1-8.

Comment I56-15 Response: Please see response to comment I1-9.

Comment I56-15 Response: Please see responses to comments I1-10 and I1-11.

Comment I56-15 Response: Please see response to comment I1-12.

Comment I56-15 Response: Please see response to comment I1-13.

Comment I56-15 Response: Please see response to comment I1-14.

Comment I56-15 Response: Please see response to comment I1-15.

Comment I56-15 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I57. ERICA LYNN-CROY; OCTOBER 15, 2026

Response to Comment Letter I57. Erica Lynn-Croy

Comment I57-15 Response: Please see response to comment I1-1.

Comment I57-15 Response: Please see response to comment I1-2.

Comment I57-15 Response: Please see response to comment I1-3.

Comment I57-15 Response: Please see response to comment I1-4.

Comment I57-15 Response: Please see response to comment I1-5.

Comment I57-15 Response: Please see response to comment I1-6.

Comment I57-15 Response: Please see response to comment I1-7.

Comment I57-15 Response: Please see response to comment I1-8.

Comment I57-15 Response: Please see response to comment I1-9.

Comment I57-15 Response: Please see responses to comments I1-10 and I1-11.

Comment I57-15 Response: Please see response to comment I1-12.

Comment I57-15 Response: Please see response to comment I1-13.

Comment I57-15 Response: Please see response to comment I1-14.

Comment I57-15 Response: Please see response to comment I1-15.

COMMENT LETTER I58. NANCY AND STEWART MACKENZIE; OCTOBER 14, 2026

Response to Comment Letter I58. Nancy and Stewart MacKenzie

Comment I58-15 Response: The commenter's background is noted. Please see response to comment I1-1.

Comment I58-15 Response: Please see response to comment I1-2.

Comment I58-15 Response: Please see response to comment I1-3.

Comment I58-15 Response: Please see response to comment I1-4.

Comment I58-15 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I58-15 Response: Please see response to comment I1-5.

Comment I58-15 Response: Please see responses to comments I1-6 and I1-7.

Comment I58-15 Response: Please see response to comment I1-8.

Comment I58-15 Response: Please see response to comment I1-9.

Comment I58-15 Response: Please see responses to comments I1-10 and I1-11.

Comment I58-15 Response: Please see response to comment I1-12.

Comment I58-15 Response: Please see response to comment I1-13.

Comment I58-15 Response: Please see response to comment I1-14.

Comment I58-15 Response: Please see response to comment I1-15.

COMMENT LETTER I59. DENNIS MANGERS AND MICHAEL SESTAK; SEPTEMBER 8, 2026

Response to Comment Letter I59. Dennis Mangers

Comment I59-1 Response: The District appreciates the support for the proposed project expressed by the commenters. The comment is noted.

COMMENT LETTER I60. LORRAINE MARKOFF; OCTOBER 15, 2026

Response to Comment Letter I60. Lorraine Markoff

Comment I60-1 Response: Please see response to comment I1-1.

Comment I60-2 Response: Please see response to comment I1-2.

Comment I60-3 Response: Please see response to comment I1-3.

Comment I60-4 Response: Please see response to comment I1-4.

Comment I60-5 Response: Please see response to comment I1-5.

Comment I60-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I60-7 Response: Please see response to comment I1-8.

Comment I60-8 Response: Please see response to comment I1-9.

Comment I60-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I60-10 Response: Please see response to comment I1-12.

Comment I60-11 Response: Please see response to comment I1-13.

Comment I60-12 Response: Please see response to comment I1-14.

Comment I60-13 Response: Please see response to comment I1-15.

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COMMENT LETTER I61. RACHEL MARKOFF; OCTOBER 15, 2026

Response to Comment Letter I61. Rachel Markoff

Comment I61-1 Response: Please see response to comment I1-1.

Comment I61-2 Response: Please see response to comment I1-2.

Comment I61-3 Response: Please see response to comment I1-3.

Comment I61-4 Response: Please see response to comment I1-4.

Comment I61-5 Response: Please see response to comment I1-5.

Comment I61-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I61-7 Response: Please see response to comment I1-8.

Comment I61-8 Response: Please see response to comment I1-9.

Comment I61-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I61-10 Response: Please see response to comment I1-12.

Comment I61-11 Response: Please see response to comment I1-13.

Comment I61-12 Response: Please see response to comment I1-14.

Comment I61-13 Response: Please see response to comment I1-15.

COMMENT LETTER I62. BARBARA MCKNIGHT; OCTOBER 14, 2026

Response to Comment Letter I62. Barbara McKnight

Comment I62-1 Response: Draft EIR Chapter 6, "Alternatives," evaluates the No Project Alternative, under which Rio Americano High School would continue using El Camino High School Stadium for nighttime football games. Chapter 6 also discusses alternative stadium locations considered but not carried forward for detailed analysis. Please see Master Response 8: Alternatives. Questions regarding project funding and potential tax increases are noted. Regarding property values, CEQA Guidelines Section 15131(a) provides that economic or social effects are not, by themselves, considered significant environmental effects under CEQA. Potential physical environmental effects on the American River Parkway are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 5.13, "Recreation." Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I62-2 Response: Draft EIR Section 4.4, "Transportation and Circulation," evaluates potential traffic and circulation impacts associated with stadium events, including event-related parking demand and vehicle circulation. Mitigation Measures 4.4-3a through 4.4-3c address parking, transportation management, and access and circulation. Operational noise impacts are evaluated in Draft EIR Section 4.3, "Noise and Vibration," and Mitigation Measure 4.3-1b establishes operational noise controls. Draft EIR Section 5.14, "Utilities and Service Systems," evaluates solid-waste generation and disposal and explains that operational waste would continue to be managed through the District's existing collection and recycling services. Please also see Master Response 6: Parking Availability and Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

COMMENT LETTER I63. LISA MERRITT M.D.; OCTOBER 14, 2026

Response to Comment Letter I63. Lisa Merritt M.D.

Comment I63-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I63-2 Response: The commenter's summary of the proposed project components is noted. Draft EIR Section 4.2, "Biological Resources," Impact 4.2-1 (page 4.2-17 through 4.2-19) evaluates the potential impacts on wildlife related to the use of the proposed nighttime lighting, as well as the number of sports events at Raider Stadium and the times when those events would occur (as detailed in Draft EIR Chapter 3, "Project Description," pages 3-4 through 3-9).

Comment I63-3 Response: The Draft EIR includes an ambient noise level measurement at the eastern edge of the high school campus boundary immediately adjacent to the backyards of the private residences along Whitehall Way (please see Draft EIR Exhibit 4.3-2, page 4.3-7), which was appropriately used in the impact analysis related to noise impacts on adjacent private property. Draft EIR Section 4.3, "Noise and Vibration," includes analyses of construction noise, operation of the upgraded public address system, event-related traffic, and comparison with existing ambient noise conditions, as requested by the commenter. Please see Impact 4.3-1 (pages 4.3-16 through 4.3-27). No changes to the Draft EIR are required.

Comment I63-4 Response: Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 and 4.3-26) includes reasonable restrictions on amplified sound, evening hours, and lighting hours, as suggested by the commenter. Draft EIR Chapter 3, "Project Description," includes the frequency of nighttime events associated with the proposed project which are analyzed throughout all topic areas of the Draft EIR. Regarding the commenter's opinion that sound barriers should be considered, the District did consider noise barriers, but this is infeasible. In order to provide benefit, the noise barriers should need to break the line of sight between the noise source and the noise receptor, which is infeasible for a project where noise sources include bleachers and where the noise source is at a distance from the noise receptors. In addition, since the proposed Project is primarily shifting noise-generating events in time and adding a very limited number of new events that must currently be hosted elsewhere, it is infeasible to construct noise barriers to address infrequent events, particularly since the construction of noise barriers would introduce environmental effects (construction noise and air quality, for example).

Comment I63-5 Response: Please see response to comment I63-2.

Comment I63-6 Response: Project-related impacts on bats are evaluated in Draft EIR Section 4.2, "Biological Resources," Impact 4.2-1 (pages 4.2-15 through 4.2-21) and, as noted by the commenter, were found to be less than significant. No changes to the Draft EIR are required.

Comment I63-7 Response: The analysis requested by the commenter is contained in Draft EIR Section 4.2, "Biological Resources," Impact 4.2-1 (pages 4.2-15 through 4.2-24). Please see also response to comment O5-8. No changes to the Draft EIR are required.

Comment I63-8 Response: The analyses requested by the commenter are contained in Draft EIR Section 4.3, "Noise and Vibration," Section 4.4, "Traffic and Transportation," and Section 5.2, "Air Quality." No changes to the Draft EIR are required.

Comment I63-9 Response: An analysis of air quality impacts is contained in Draft EIR Section 5.2, "Air Quality." Localized exposures associated with the project are evaluated in Impact 5.2-3, which describes that impacts related to exposure of sensitive receptors to substantial pollutant concentrations would be less than significant due to the temporary and intermittent generation of emissions during construction, as well as the dispersive nature of diesel particulate matter emissions. The location of sensitive receptors, which include children, the elderly, and individuals with chronic and acute illnesses, was considered in the evaluation of project air quality impacts. No changes to the Draft EIR are required.

Comment I63-10 Response: Impacts associated with diesel equipment, construction traffic, dust, and excavation are evaluated in Draft EIR Section 5.2, "Air Quality". Noise impacts are evaluated in Draft EIR Section 4.3, "Noise and Vibration". Draft EIR Mitigation Measure 5.2-1 addresses the commenters concerns and requires implementation of watering, limitation of diesel idling in accordance with regulatory requirements, maintenance of equipment in proper working condition according to manufacturer's specifications. Construction-related emissions, including particulate matter, would be well below the Sacramento Air Quality Management District recommended thresholds of significance, as shown in Table 5.2-1, and would be limited through Mitigation Measure 5.2-1; as such, monitoring of particulate matter emissions would not result in meaningful reductions of emissions. No changes to the Draft EIR are required.

Comment I63-11 Response: The Draft EIR contains a thorough and appropriate cumulative impact analysis in Draft EIR Section 7.1, "Cumulative Impacts" (pages 7-1 through 7-13). Growth-inducing effects are evaluated in Draft EIR Section 7.2 (page 7-13). No changes to the Draft EIR are required.

Comment I63-12 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I63-13 Response: The Draft EIR does not identify an adverse impact on any known culturally significant locations. The proposed project would be implemented at the existing Rio Americano High School campus, which was originally developed as a school in 1963. As stated in Draft EIR Section 4.5, "Tribal Cultural Resources," Impact 4.5-1 (page 4.5-11), on November 24, 2025, AECOM sent Assembly Bill 52 notification and invitation to consult letters, via email, to each listed individual and organization on the contact list provided by Native American Heritage Commission. Wilton Rancheria and the United Auburn Indian Community both responded that they wished to consult. However, neither tribe identified Tribal Cultural Resources in or near the project site, and no Tribal Cultural Resources were identified during previous ground-disturbing activities, nor in the North Central Information Center of the California Historical Resources Information System records searches. Out of an abundance of caution, the Draft EIR identified Mitigation Measures 4.5-1a, 4.5-1b, and 4.5-1c, which incorporate the mitigation measures recommended by the United Auburn Indian Community in case of accidental discovery of previously unknown Tribal Cultural Resources.

Comment I63-14 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted. With regards to the commenter's question as to the whether the proposed project includes improvements to track and field or tennis facilities, the answer is no. All components of the proposed project are identified in Draft EIR Chapter 3, "Project Description," on pages 3-4 through 3-9.

Comment I63-15 Response: A smaller scale alternative that "improves the existing athletic facility without transforming its intensity of use, for example, more limited seating expansion, less intrusive lighting, preservation of existing nighttime limitations, restrictions on amplified sound, sound walls, fewer large community events, and targeted improvements to track-and-field and other student athletic facilities," as suggested by the commenter, would not meet the project's purpose and need and would not accomplish any of the project's objectives. The purpose of the proposed project is to meet a need for permanent nighttime lighting at the existing Raider Stadium so that nighttime sports events (particularly football games) can be held on campus instead of requiring students, parents, coaches, and sports attendees to drive to the El Camino High School as they do now. Please see also Master Response 6: Alternatives. No changes to the Draft EIR are required.

Comment I63-16 Response: The commenter's opposition to the proposed project, and request for continuation of existing conditions (i.e., Alternative 1: No Project Alternative) is noted.

Comment I63-17 Response: With regards to the commenter's request that the District evaluate a less intensive alternative, please see response to comment I63-15. The Draft EIR contains a "rigorous analysis of noise, nighttime lighting, wildlife, traffic, localized air quality, construction impacts, public health and cumulative impacts upon the American River corridor" as requested by the commenter. No changes to the Draft EIR are required.

Comment I63-18 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I64. LAURA MILLS; OCTOBER 15, 2026

Response to Comment Letter I64. Laura Mills

Comment I64-1 Response: Responses to individual comments are provided in I64-2 through I64-15.

Comment I64-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I64-3 Response: Please see response to comment I1-4. The commenter's opposition to the proposed project is noted.

Comment I64-4 Response: The commenter correctly states that Draft EIR Impact 4.3-1 found that short-term construction-related noise and long-term operational noise from the proposed project would be significant and unavoidable even after implementation of all feasible mitigation measures (Draft EIR pages 4.3-16 through 4.3-27).

Comment I64-5 Response: Please response to comment I1-7.

Comment I64-6 Response: Draft EIR Impact 4.1-2 (pages 4.1-18 through 4.1-26) correctly concludes that nighttime skyglow and glare impacts from the proposed project would be less than significant with implementation of Mitigation Measure 4.1-2. Furthermore, the "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Appendix B. Draft EIR Impact 4.2-1 (pages 4.2-17 through 4.2-19) correctly concludes that nighttime impacts to wildlife in the Parkway would be less than significant. Therefore, the significant and unavoidable impacts suggested by the commenter would not occur, and no changes to the Draft EIR are required.

Comment I64-7 Response: Please see response to comment I82-6.

Comment I64-8 Response: Please see response to comment I1-9.

Comment I64-9 Response: Please see response to comment I1-10.

Comment I64-10 Response: Please see response to comment I1-11.

Comment I64-11 Response: Please see response to comment I1-12.

Comment I64-12 Response: Please see response to comment I1-13.

Comment I64-13 Response: Please see response to comment I1-14.

Comment I64-14 Response: Please see response to comment I1-15.

Comment I64-15 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I65. ILAH ROSE MINTON; SEPTEMBER 26, 2026

Response to Comment Letter I65. Ilah Rose Minton

Comment I66-1 Response: Please see response to comment I1-1.

Comment I66-2 Response: Please see response to comment I1-2.

Comment I66-3 Response: Please see response to comment I1-3.

Comment I66-4 Response: Please see response to comment I1-4.

Comment I66-5 Response: Please see response to comment I1-5.

Comment I66-6 Response: Please see response to comment I1-6.

Comment I66-7 Response: Please see response to comment I1-7.

Comment I66-8 Response: Please see response to comment I1-8.

Comment I66-9 Response: Please see response to comment I1-9.

Comment I66-10 Response: Please see response to comment I1-10.

Comment I66-11 Response: Please see response to comment I1-11.

Comment I66-12 Response: Please see response to comment I1-12.

Comment I66-13 Response: Please see response to comment I1-13.

Comment I66-14 Response: Please see response to comment I1-14.

Comment I66-15 Response: Please see response to comment I1-15.

Comment I66-16 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I66. JANICE MODIN; OCTOBER 14, 2026

Response to Comment Letter I66. Janice Modin

Comment I66-1 Response: The commenter's opposition to the proposed project is noted. Potential impacts associated with nighttime lighting, biological resources, and operational noise are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 4.3, "Noise and Vibration," respectively. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I66-2 Response: Draft EIR Section 4.1, "Aesthetics," evaluates the project's potential to create light trespass, glare, and skyglow, and includes the photometric analysis prepared by Musco Lighting as Appendix B. Operational impacts of nighttime lighting on wildlife are evaluated in Draft EIR Section 4.2, "Biological Resources," including potential effects on foraging, roosting, nesting, movement, and migratory behavior. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. Draft EIR Mitigation Measure 4.1-2 requires the District to submit the proposed lighting design to the International Dark Sky Association for a Design Analysis and obtain a "pass" rating before construction may commence. After the Draft EIR was prepared, the District has since received the required "pass" rating for the proposed project's lighting design from the Dark Sky Association (attached to this FEIR as Appendix B). No changes to the Draft EIR are required.

Comment I66-3 Response: Draft EIR Section 4.3, "Noise and Vibration," concludes that operational stadium event noise would remain significant and unavoidable after implementation of feasible mitigation. Separately, the potential effects of operational noise on wildlife are evaluated in Draft EIR Section 4.2, "Biological Resources." As explained in Impact 4.2-1 (pages 4.2-20 and 4.2-21), the analysis considers noise levels associated with higher-attendance sports events and concludes that operational noise impacts on wildlife would be less than significant. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I66-4 Response: Draft EIR Section 4.2, "Biological Resources," evaluates potential operational noise effects on wildlife, including potential effects on behavioral patterns, foraging, nesting, roosting, and movement. The evaluation considers the existing environmental setting, the frequency and timing of new stadium events, proximity of suitable habitat, and noise levels during stadium events in reaching less-than-significant conclusions for operational impacts on wildlife. Draft EIR Section 4.3, "Noise and Vibration," identifies feasible measures to reduce operational stadium event noise, and Draft EIR Chapter 6, "Alternatives," evaluates alternatives to the proposed project. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources and Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I66-5 Response: As stated on Draft EIR page 4.3-15, the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element. Please see the detailed discussion regarding

the use of Sacramento County Noise Ordinance standards as CEQA thresholds for the proposed project contained in Draft EIR Section 4.3, "Noise and Vibration," on pages 4.3-15 and 4.3-16. Draft EIR Mitigation Measure 4.3-1b includes public-address system testing and performance standards, property-line noise measurements, volume-limiting controls, and operational restrictions for stadium events. No changes to the Draft EIR are required.

Comment I66-6 Response: Draft EIR Mitigation Measure 4.3-1b includes feasible measures to reduce stadium event noise, including controls on public address and amplified sound, artificial noisemakers, event scheduling and use, and bleacher and ramp noise. Draft EIR Chapter 6, "Alternatives," evaluates the No Project Alternative and Alternative 2: Reconfigure Stadium and Athletic Fields. Please see also Master Response 8: Alternatives, which addresses additional alternatives related to reduced nighttime operations, modified scheduling, alternate venues, and reconfiguration of the stadium and athletic fields. No changes to the Draft EIR are required.

Comment I66-7 Response: The Draft EIR's evaluation of operational impacts on wildlife is not limited to the effects of a single stadium event. The evaluation in Impacts 4.2-1 and 4.2-4 considers the existing environmental setting, the frequency and timing of new stadium events, proximity of suitable habitat for native wildlife species, light and noise levels during new stadium events, and the nature of potential impacts to wildlife species in reaching less-than-significant determinations. The analysis also considers the timing of events relative to sensitive wildlife periods, including nesting, roosting, and other sensitive life stages. Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources for additional details regarding evaluation of operational light and noise impacts on biological resources in the Draft EIR. No changes to the Draft EIR are required.

Comment I66-8 Response: Draft EIR Section 4.1, "Aesthetics," evaluates the proposed stadium lighting's potential to result in light trespass, glare, and skyglow and includes a project-specific photometric analysis prepared by Musco Lighting in Appendix B. Draft EIR Section 4.2, "Biological Resources," separately evaluates the potential effects of operational nighttime lighting on wildlife, including effects on foraging, nesting, roosting, and wildlife movement and migration. The biological resources analysis also considers modeled light levels within the American River Parkway and concludes that the proposed stadium lighting would generate 0.00 footcandle at the northernmost edge of the Parkway adjacent to riparian habitat. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources and Draft EIR Mitigation Measure 4.1-2, which requires the proposed lighting design to obtain a "pass" rating from the International Dark Sky Association before construction may commence. No changes to the Draft EIR are required. After the Draft EIR was prepared, the District has since received the required "pass" rating for the proposed project's lighting design from the Dark Sky Association (attached to this FEIR as Appendix B).

Comment I66-9 Response: The proposed stadium light standards would be shielded and directed downward to reduce light spillover and nighttime glare, and the proposed stadium lighting would have adjustable lighting settings to allow greater control

of light trespass and brightness. Draft EIR Mitigation Measure 4.1-2 requires the District to submit the proposed lighting design to the International Dark Sky Association for a Design Analysis and obtain a "pass" rating before construction may commence. After the Draft EIR was prepared, the District has since received the required "pass" rating for the proposed project's lighting design from the Dark Sky Association (attached to this FEIR as Appendix B). Draft EIR Section 4.2, "Biological Resources," also identifies the anticipated timing and frequency of nighttime lighting use and evaluates potential effects of operational lighting on wildlife. The commenter's requests for additional lighting controls, including restrictions related to spectral characteristics and automatic shutoff, are noted. No changes to the Draft EIR are required.

Comment I66-10 Response: As stated on Draft EIR page 4.3-15, the District is not legally subject to the Sacramento County Noise Ordinance or the County General Plan Noise Element. The Draft EIR nevertheless uses applicable County noise standards as CEQA thresholds for evaluating potential noise impacts. Please see Draft EIR Section 4.3, "Noise and Vibration," pages 4.3-15 and 4.3-16. In addition, Mitigation Measure 4.3-1b requires a sound check and property line noise measurement before operation of the permanent public address system for evening events, requires adjustment of the system and additional controls if necessary to achieve the specified performance standard, and requires the approved public address settings to be documented and maintained for evening events. Event staff are prohibited from increasing the public address volume above the approved settings. No changes to the Draft EIR are required.

Comment I66-11 Response: Draft EIR Mitigation Measure 4.3-1b includes feasible measures to reduce stadium event noise, including controls on public address and amplified sound, artificial noisemakers, event scheduling and use, and bleacher and ramp noise. As explained in Draft EIR Section 4.3, even with implementation of these feasible mitigation measures, operational stadium event noise during intermittent high-capacity events would remain significant and unavoidable. Draft EIR Chapter 6, "Alternatives," also evaluates alternatives to the proposed project, including the No Project Alternative and Alternative 2: Reconfigure Stadium and Athletic Fields, and discusses other alternatives considered but not carried forward for detailed analysis. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I66-12 Response: Draft EIR Chapter 6, "Alternatives," describes the alternatives considered by the District, evaluates the No Project Alternative and Alternative 2: Reconfigure Stadium and Athletic Fields in detail, and explains the reasons other alternatives were not carried forward for detailed analysis. The No Project Alternative would avoid the proposed project's significant and unavoidable operational stadium event noise impact but would not meet the project objectives. Alternative 2 would relocate the stadium farther from the American River Parkway but would result in greater construction impacts and slightly greater operational noise impacts at surrounding residential receptors compared to the proposed project. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I66-13 Response: Operational impacts on wildlife, including the effects of nighttime lighting, noise, and people, are evaluated in Draft EIR Section 4.2, "Biological

Resources." The evaluation considers the existing environmental setting, frequency and timing of new stadium events, proximity of suitable habitat for native wildlife species, light and noise levels during new stadium events, and sensitive periods for wildlife in reaching less-than-significant determinations. Cumulative impacts of the proposed project in combination with other past, present, and reasonably foreseeable projects are evaluated separately in Draft EIR Section 7.1.3, "Cumulative Impact Analysis." Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. No changes to the Draft EIR are required.

Comment I66-14 Response: Draft EIR Mitigation Measure 4.1-2 establishes a performance requirement for the proposed stadium lighting by requiring the District to obtain a "pass" rating from the International Dark Sky Association before construction may commence; if the proposed design does not meet the program guidelines, the design must be refined and resubmitted until it receives a "pass" rating. After the Draft EIR was prepared, the District has since received the required "pass" rating for the proposed project's lighting design from the Dark Sky Association (attached to this FEIR as Appendix B). Draft EIR Mitigation Measure 4.3-1b establishes performance standards and operational controls for stadium event noise, including public-address system testing, property-line noise measurements, maximum public-address system noise levels, documented approved settings, and restrictions preventing event staff from exceeding those settings. The District's MMRP, as required by CEQA, provides an enforceable mechanism to ensure that lighting and noise mitigation measures are implemented, monitored, and corrected if necessary. The District is legally obligated to comply with these requirements, and CEQA presumes faithful implementation. Therefore, no additional corrective-action program or external enforcement mechanism is required under CEQA. It is reasonable and consistent with CEQA to assume that the District will implement the project as described, including all mitigation requirements. Courts have recognized that agencies are presumed to act in good faith and in accordance with their adopted programs (see Citizens for Responsible Equitable Environmental Development v. City of San Diego (2011) 196 Cal.App.4th 515, 528).

Comment I66-15 Response: The Draft EIR evaluates the physical environmental effects associated with the proposed stadium improvements and increased nighttime use, including potential effects from nighttime lighting, operational noise, and stadium activity. These impacts are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," and 4.3, "Noise and Vibration." Potential effects on and consistency with the American River Parkway are also evaluated in the Draft EIR. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources. The commenter's concerns are noted. No changes to the Draft EIR are required.

Comment I66-16 Response: The Draft EIR evaluates potential long-term operational effects on biological resources, including effects associated with nighttime lighting and operational noise, in Section 4.2, "Biological Resources." The Draft EIR also evaluates alternatives to the proposed project in Chapter 6, "Alternatives." Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on

Biological Resources and Master Response 8: Alternatives. The commenter's concerns are noted. No changes to the Draft EIR are required.

COMMENT LETTER I67. WENDY MONEY; OCTOBER 14, 2026

Response to Comment Letter I67. Wendy Money

Comment I67-1 Response: Please see response to comment I1-1.

Comment I67-2 Response: Please see response to comment I1-2.

Comment I67-3 Response: Please see response to comment I1-3.

Comment I67-4 Response: Please see response to comment I1-4

Comment I67-5 Response: Please see response to comment I1-5.

Comment I67-6 Response: Please see response to comment I1-6.

Comment I67-7 Response: Please see response to comment I1-7.

Comment I67-8 Response: Please see response to comment I1-8.

Comment I67-9 Response: Please see response to comment I1-9.

Comment I67-10 Response: Please see response to comment I1-10.

Comment I67-11 Response: Please see response to comment I1-11.

Comment I67-12 Response: Please see response to comment I1-12.

Comment I67-13 Response: Please see response to comment I1-13.

Comment I67-14 Response: Please see response to comment I1-14.

Comment I67-15 Response: Please see response to comment I1-15.

Comment I67-16 Response: Please see response to comment I1-2.

COMMENT LETTER I68. LESLIE MORELLI; SEPTEMBER 26, 2026

Response to Comment Letter I68. Leslie Morelli

Comment I68-1 Response: This comment letter (I68), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I68-2 through I68-16.

Comment I68-2 Response: Please see response to comment I1-1.

Comment I68-3 Response: Please see response to comment I1-2.

Comment I68-4 Response: Please see response to comment I1-3.

Comment I68-5 Response: Please see response to comment I1-4.

Comment I68-6 Response: Please see response to comment I1-5.

Comment I68-7 Response: Please see response to comment I1-6.

Comment I68-8 Response: Please see response to comment I1-7.

Comment I68-9 Response: Please see response to comment I1-8.

Comment I68-10 Response: Please see response to comment I1-9.

Comment I68-11 Response: Please see response to comment I1-10.

Comment I68-12 Response: Please see response to comment I1-11.

Comment I68-13 Response: Please see response to comment I1-12.

Comment I68-14 Response: Please see response to comment I1-13.

Comment I68-15 Response: Please see response to comment I1-14.

Comment I68-16 Response: Please see response to comment I1-15.

COMMENT LETTER I69. LORETTA MORENO; OCTOBER 13, 2026

Response to Comment Letter I69. Loretta Moreno

Comment I69-1 Response: Responses to individual comments are provided in I69-2 through I69-28, below.

Comment I69-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I69-3 Response: Please see response to comment I1-1. No changes to the Draft EIR are required.

Comment I69-4 Response: The District received the NOP comment letter from the Sacramento County Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the County Parks letter is provided in Draft EIR Appendix A. Sacramento County Parks Department did not submit any comment letter on the Draft EIR. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. The commenters' opposition to the project is noted.

Comment I69-5 Response: As explained in Master Response 9: Cumulative Impacts and Master Response 10: Project Description, the Draft EIR relies on a stable project description, includes all required impact analyses, and analyzed cumulative impacts. The environmental baseline – the existing conditions – are compared with activities attributable to the proposed project in order to isolate impacts of the project. In this case, the existing conditions include athletic practices, athletic competitions, the use of lights, the use of a public address system, vehicles traveling to and from the high school campus, vehicles using the parking facilities, and other activities that would also occur following implementation of the project. The Athletic Director and High School Principal and their staff provided a detailed and comprehensive accounting of all existing use of the existing sports facilities on the high school campus in order to precisely establish the baseline conditions against which project impacts would be compared. The baseline conditions are detailed and contrasted with conditions under the proposed project throughout the Draft EIR, starting with the Project Description, and in particular, within Table 3-1 and Section 3.2.3. Within this portion of the Draft EIR, SJUSD explains that the proposed project would allow updating of the public address system and lighting system to incorporate best practices, as well as hosting five to eight home football games, graduation, and other community events – assumed to occur once monthly. The anticipated activities – their types, attendance levels, and timing – has not changed. Therefore, no changes to the Draft EIR are necessary, and recirculation is not required.

Comment I69-6 Response: The proposed project objectives are focused on serving Rio Americano High School. Education Code § 38131 establishes that every public school facility and grounds in California must have a "civic center" for community use, and it outlines the purposes for which school districts may grant access. Accordingly, San Juan Unified School District Board of Directors approved the District's Use of School Facilities Handbook (revised 2023), which outlines the process for community use of school facilities, which includes the existing Raider Stadium

and that as it would exist with implementation of the proposed project, under a structured permit, fee, and eligibility system that mirrors the statute's list of authorized purposes. While Rio Americano and other campuses do not have a history of frequent community use, the Draft EIR uses reasonable and conservative assumptions for the analysis presented therein. For example, for the air quality analysis, the underlying vehicular activity assumes eight new home football games per year (the actual level of activity would be between five and eight games per year), four school assemblies, graduation and four new potential school-sanctioned community events, which were assumed to be peak-attendance events. Draft EIR Chapter 3, "Project Description," defines the proposed project components and the range of existing and future activities accommodated on-site (i.e., number of attendees that may attend various events) that would occur with implementation of the proposed project. The EIR appropriately evaluates multiple scenarios that represent the range of activities that would be accommodated by implementation of the proposed project. The Draft EIR provides a detailed accounting of the existing conditions, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares the existing conditions to what would occur under the proposed project. See also, Master Response 10 regarding a stable project description. Finally, as to the commenter's reference to a direct conversation with the Chief Operations Officer for the District, "comments with respect to an environmental impact report shall not be deemed determinative of whether the project may have a significant effect on the environment." (Pub. Resources Code, § 21082.2(e).)

Comment I69-7 Response: With regards to event frequency, please see response to comment I1-9. Because the commenter does not reference specific mitigation measures, the District cannot respond with specificity other than to state that enforceable mechanisms are incorporated as part of all of the mitigation measures contained in the Draft EIR; therefore, no changes to the Draft EIR are required.

Comment I69-8 Response: See the responses to comments I69-6 and I47-10. Because the commenter does not reference specific Draft EIR impacts or page numbers, the District cannot respond with specificity other than to state that the Draft EIR comprehensively evaluates all proposed events at Raider Stadium as listed in Draft EIR Table 3-1 (page 3-9), and their potential associated physical environmental impacts. No changes to the Draft EIR are required.

Comment I69-9 Response: The Draft EIR's assertions in Section 4.1, "Aesthetics," that the project site not visible from the Parkway due to the intervening presence of the elevated American River north bank flood bank levee are correct; please see Photo Viewpoint KOP-7 on Draft EIR page 4.1-8. The Draft EIR further correctly notes that the levee crown road is a maintenance access road for use by the U.S. Army Corps of Engineers, the Sacramento Area Flood Control Agency, and their authorized contractors; public vehicular traffic is prohibited and the levee crown road is not designated as a trail. Nevertheless, the Draft EIR analyzes the potential impact from pedestrians and bicyclists who may use the levee crown maintenance road in Impacts 4.1-1 and 4.1-2 (Draft EIR pages 4.1-16 through 4.1-26). No changes to the Draft EIR are required.

Comment I69-10 Response: Please see responses to comments I1-1, I1-2 and I1-8. No changes to the Draft EIR are required.

Comment I69-11 Response: Draft EIR Chapter 4.2, "Biological Resources," appropriately evaluates the project's potential lighting related impacts on wildlife in the riparian habitat of the Parkway.

Comment I69-12 Response: The analysis of lighting impacts on wildlife, including nocturnal species and migratory birds, is included in the Draft EIR under Impact 4.2-1 (pages 4.2-17 to 4.2-21). The referenced effects to wildlife included in this comment are addressed therein. No changes to the Draft EIR are required.

Comment I69-13 Response: In accordance with Mitigation Measure 4.1-2 (Draft EIR page 4.1-26), following publication of the Draft EIR, the District submitted the proposed lighting design to the International Dark Sky Association for a Design Analysis and requested a determination as to whether the design meets the program guidelines. The proposed project meets Dark Sky Outdoor Sports Lighting Program criteria and has received a "pass" rating for lighting performance (see Appendix B to this FEIR). There is no "requirement" at any school for "post-installation field certification" related to lighting, and since the appropriate modeling has been performed by Musco Lighting and the required DarkSky "pass" rating has been obtained, there is no reason to require any type of "certification" post construction. The proposed project has been designed to reduce light spill and glare, as well as manage high angle light pollution to minimize offsite light trespass and sky glow. The Dark Sky Association "Pass" rating indicates that the project's impacts related to nighttime lighting and glare from proposed stadium light stands would be avoided or minimized, consistent with the determination of the Draft EIR.

With respect to the separate, low-level egress/pathway safety lighting, CEQA does not require third-party certification for lighting systems, and substantial evidence provided in the Draft EIR without such certification demonstrates that physical lighting effects have been minimized to a less-than-significant level. The proposed egress/pathway lighting has been designed to meet applicable California Building and Energy Code requirements for life-safety illumination, which govern pedestrian egress routes during and immediately after events. The egress lighting is distinct in function and design from the proposed stadium lighting, operating at low mounting heights, with shielding and directional control to provide only the minimum illumination necessary for safe exiting. Requiring additional certification for egress/pathway lighting would not further reduce a significant environmental effect, as the lighting design and operational measures already ensure compliance with CEQA and applicable codes. Therefore, no further certification is warranted or necessary.

Comment I69-14 Response: Draft EIR under Impact 4.2-1 in Section 4.2, "Biological Resources," contains an analysis of both construction- and operation-related potential noise effects on wildlife, as indicated under the headings "Construction-Related Impacts" (page 4.2-15 to 4.2-17), and "Operational Impacts" (page 4.2-17 to 4.2-21). No changes to the Draft EIR are required.

Comment I69-15 Response: Policies that protect biological resources are identified and summarized in Section 4.2.2 of the Draft EIR (pages 4.2-10 through 4.2-14), and includes the American River Parkway Plan. With regards to the applicability of the American River Parkway Plan and the Urban American River Parkway Preservation Act, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I69-16 Response: Draft EIR Section 5.13, "Recreation," contains a thorough and complete analysis of the project's potential impacts related to recreation. As stated on Draft EIR page 5.13-3, "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*." [Emphasis added.] The commenter expresses no concern that the existing school sports events, which are held during both daytime and nighttime periods, are adversely affecting the Parkway now, but instead alleges, without any evidence, that the proposed project would adversely affect the "tranquil recreational experience sought by hundreds of thousands of Parkway visitors." As stated on Draft EIR page 5.13-33, the adjacent American River Parkway is closed to public use after dark. Nighttime games are the times when larger attendance at Raider Stadium would occur; since there would be no recreationists on the Parkway during the times when these sports events would be held, there would necessarily be no impact related to Parkway recreation. Therefore, the Draft EIR properly concludes that recreation impacts would be less than significant. With regards to potential project-related impacts on wildlife in the Parkway, please see response to comment I69-14 above. No changes to the Draft EIR are required.

Comment I69-17 Response: Any nighttime pedestrian and bicycle ingress via unlit Parkway trails and levee paths would constitute an illegal activity. Therefore, the analysis suggested by the commenter is not required.

Comment I69-18 Response: Draft EIR Impact 4.3-1 (pages 4.3-18 through 4.3-20) and Mitigation Measure 4.3-1b (Draft EIR pages 4.3-25 through 4.3-27) address the stadium noise referenced by the commenter, including marching bands, the public address system, and the spectators.

Comment I69-19 Response: There is no need to model noise carry over the American River as requested by the commenter because the noise levels would generally decrease with distance (as explained in Draft EIR Impact 4.3-1). The nearest sensitive receptors where noise levels may exceed respective standards were modeled (see Draft EIR Appendix D). Although sound propagation across the American River may be influenced by open-water conditions and atmospheric temperature inversions, these conditions do not eliminate geometric spreading. Accordingly, stadium-event noise would be expected to decrease with distance across the river, although the magnitude of attenuation would vary with atmospheric conditions, source characteristics, and receptor location. Therefore, noise levels at more distant receptors across the American River, particularly considering topography and vegetation, would be expected to be lower than at the modeled receptors that included residences adjacent to the school property line, although actual levels would depend on source orientation, shielding, and atmospheric conditions. No changes to the Draft EIR are required.

Comment I69-20 Response: The Draft EIR, including Section 4.3, "Noise and Vibration," contains feasible mitigation measures where potentially significant or significant impacts are identified. Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 and 4.3-26) requires a variety of specific stadium event noise controls to be implemented during all stadium usage (i.e., both daytime and nighttime events). The commenter provides no reasoning or evidence to support her opinion that Mitigation Measure 4.3-1b would not be enforceable. Therefore, no changes to the Draft EIR are necessary.

Comment I69-21 Response: The requirements of CEQA Guidelines Section 15355 related to cumulative impacts are discussed on Draft EIR page 7-1. As discussed therein, cumulative impacts occur 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." The existing conditions cited by the commenter, including the "Sheriff's Training Center, Cordova High School, and Hagan Park," are not past, present, or reasonably foreseeable probable future projects. Please see also, Master Response 9 with regard to cumulative analysis and impacts.

Comment I69-22 Response: The proposed project is confined to the existing Rio Americano High School campus, and therefore would result in no encroachment on or degradation of the Parkway (please see Exhibit 3-3, Proposed Project Improvement Areas, on Draft EIR page 3-5). Potential impacts on biological resources, including those associated with the Parkway, are comprehensively evaluated in Section 4.2, "Biological Resources," of the Draft EIR. No changes to the Draft EIR are required.

Comment I69-23 Response: As explained in the State CEQA Guidelines Section 15126.6(b), "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 shall 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 be more costly*." (Emphasis added.) Moreover, the District may reject as infeasible a project alternative that it determines will be undesirable from a social or economic policy standpoint. (*CNPS v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 999–1003; *City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417–418; CEQA Guidelines, § 15126.6(f)(1) "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure…"].) Otherwise, for purposes of CEQA, the concern and focus of an EIR is to analyze and mitigate for potential physical—not economic—impacts to the environment. (Pub. Resources Code, § 21060.5.) The Draft EIR appropriately evaluated an alternative that would reduce the project's noise impacts: Alternative 2. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I69-24 Response: The commenters' preference for continued use of the El Camino High School stadium for Rio Americano sports events, which is the No Project Alternative, is noted.

Comment I69-25 Response: The meaning of the comment is unclear. The Draft EIR does not conclude that Alternative 2 is infeasible (for any reason, including "potential effects on the surrounding neighborhood"), and the Alternative 2 analysis does not overstate the potential construction-related impacts. Draft EIR Chapter 6, "Alternatives," provides evaluation of the relative impacts of Alternative 2, including if and how Alternative 2 could result in greater, similar, or reduced impacts as compared to the proposed project. No changes to the Draft EIR are required.

Comment I69-26 Response: The Draft EIR does not conclude that Alternative 2 is infeasible. Rather, that is a decision for the District to ultimately make. In making that decision, however, the District may reject as infeasible any alternative it deems to be socially or economically undesirable, particularly when weighed against all other competing factors. (*Cal. Native Plant Society v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 999–1003; CEQA Guidelines, § 15126.6(f)(1); Pub. Resources Code, § 21081(a)(3).) The commenters' concerns regarding costs are thus noted.

Comment I69-27 Response: The Draft EIR adequately discloses the project's physical environmental impacts, and includes feasible mitigation measures where necessary. No changes to the Draft EIR are required.

Comment I69-28 Response: The Draft EIR adequately discloses the project's physical environmental impacts, includes feasible mitigation measures where necessary, and appropriately analyzes alternatives. Therefore, no changes to the Draft EIR are necessary and recirculation is not required.

COMMENT LETTER I70. MAUREEN MORRIS; SEPTEMBER 2, 2026

Response to Comment Letter I70. Maureen Morris

Comment I70-1 Response: The District appreciates the support for the proposed project expressed by the commenter. The comment is noted.

COMMENT LETTER I71. POLLY MURPHY-JONES; OCTOBER 14, 2026

Response to Comment Letter I71. Polly Muprhy-Jones

Comment I71-1 Response: Please see response to comment I1-1.

Comment I71-2 Response: Please see response to comment I1-2.

Comment I71-3 Response: Please see response to comment I1-3.

Comment I71-4 Response: Please see response to comment I1-4.

Comment I71-5 Response: Please see response to comment I1-5.

Comment I71-6 Response: Please see response to comment I1-6.

Comment I71-7 Response: Please see response to comment I1-7.

Comment I71-8 Response: Please see response to comment I1-8.

Comment I71-9 Response: Please see response to comment I1-9.

Comment I71-10 Response: Please see response to comment I1-10.

Comment I71-11 Response: Please see response to comment I1-11.

Comment I71-11 Response: Please see response to comment I1-12.

Comment I71-13 Response: Please see response to comment I1-13.

Comment I71-14 Response: Please see response to comment I1-14.

Comment I71-15 Response: Please see response to comment I1-15.

COMMENT LETTER I72. MAREN NASSERI; OCTOBER 16, 2026

Response to Comment Letter I72. Maren Nasseri

Comment I72-1 Response: Please see response to comment I1-1.

Comment I72-2 Response: Please see response to comment I1-2.

Comment I72-3 Response: Please see response to comment I1-3.

Comment I72-4 Response: Please see response to comment I1-4.

Comment I72-5 Response: Please see response to comment I1-5.

Comment I72-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I72-7 Response: Please see response to comment I1-8.

Comment I72-8 Response: Please see response to comment I1-9.

Comment I72-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I72-10 Response: Please see response to comment I1-12.

Comment I72-11 Response: Please see response to comment I1-13.

Comment I72-12 Response: Please see response to comment I1-14.

Comment I72-13 Response: Please see response to comment I1-15.

COMMENT LETTER I73. GERALDINE NICHOLSON; OCTOBER 15, 2026

Response to Comment Letter I73. Geraldine Nicholson

Comment I73-1 Response: Please see response to comment I1-1.

Comment I73-2 Response: Please see response to comment I1-2.

Comment I73-3 Response: Please see response to comment I1-3.

Comment I73-4 Response: Please see response to comment I1-4.

Comment I73-5 Response: Please see response to comment I1-5.

Comment I73-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I73-7 Response: Please see response to comment I1-8.

Comment I73-8 Response: Please see response to comment I1-9.

Comment I73-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I73-10 Response: Please see response to comment I1-12.

Comment I73-11 Response: Please see response to comment I1-13.

Comment I73-12 Response: Please see response to comment I1-14.

Comment I73-13 Response: Please see response to comment I1-15.

COMMENT LETTER I74. JOY NISHIDA; OCTOBER 12, 2026

Response to Comment Letter I74. Joy Nishida

Comment I74-1 Response: This comment letter (I74), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I74-2 through I74-30.

Comment I74-2 Response: Please see response to comment I1-1.

Comment I74-3 Response: Please see response to comment I1-2.

Comment I74-4 Response: Please see response to comment I1-3.

Comment I74-5 Response: Please see response to comment I1-4.

Comment I74-6 Response: Please see response to comment I1-5.

Comment I74-7 Response: Please see response to comment I1-6.

Comment I74-8 Response: Please see response to comment I1-7.

Comment I74-9 Response: Please see response to comment I1-8.

Comment I74-10 Response: Please see response to comment I1-8.

Comment I74-11 Response: Please see response to comment I1-9.

Comment I74-12 Response: Please see response to comment I1-10.

Comment I74-13 Response: Please see response to comment I1-11.

Comment I74-14 Response: Please see response to comment I1-12.

Comment I74-15 Response: Draft EIR Section 4.1, "Aesthetics," evaluates potential changes in visual character from public viewpoints surrounding the project site, including the paved access road along the crown of the north bank American River flood protection levee. The analysis considers existing views from the levee crown and the visibility of proposed stadium improvements, including the light standards. Please see Draft EIR Impact 4.1-1 (pages 4.1-15 through 4.1-18). No changes to the Draft EIR are required.

Comment I74-16 Response: Draft EIR Section 4.1, "Aesthetics," evaluates the visibility of the proposed stadium light poles and luminaires from the American River Parkway and levee crown road. The Rio Americano High School cell tower is identified in Draft EIR Table 7-1 (page 7-2) as an approved cumulative project, and cumulative impacts on visual character are evaluated in Draft EIR Section 7.1.3, "Cumulative Impact Analysis." No changes to the Draft EIR are required.

Comment 174-17 Response: The Draft EIR evaluates operational impacts of the proposed project on wildlife and habitat under Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts

4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27). The Draft EIR evaluates operational impacts of the proposed project on recreation under Impacts 5.13-1 and 5.13-2 (pages 5.13-33 and 5.13-34).

Comment I74-18 Response: Responses to the specific issues raised by the commenter related to special-status species and nesting birds are provided in I74-19 through I74-25.

Comment I74-19 Response: Table 4.2-1 (page 4.2-5) in the Draft EIR noted that monarch butterflies are unlikely to occur (but possible) at the project site, consistent with the comment. However, as noted in the Draft EIR, breeding life stages of monarch butterflies are not expected on the project site itself. Furthermore, the proposed project does not include any removal of milkweed (*Asclepias* spp.) or foraging habitat suitable for monarch butterflies on adjacent properties so would not be expected to directly impact the species. As noted in Table 4.2-1, the project site is outside the current overwintering range of monarch butterflies; the Draft EIR analysis cannot speculate on potential future changes in species' ranges.

Comment I74-20 Response: Table 4.2-1 (page 4.2-5) in the Draft EIR noted that Crotch's bumble bee are unlikely to occur (but possible) at the project site, consistent with the comment. However, as noted in the Draft EIR, breeding life stages of Crotch's bumble bee are not expected on the project site itself. Furthermore, the proposed project does not include any removal of foraging habitat suitable for Crotch's bumble bee on adjacent properties so would not be expected to directly impact the species.

Comment I74-21 Response: Table 4.2-1 (page 4.2-5) in the Draft EIR noted that northwestern pond turtle may use the levee for basking or dispersal, consistent with the comment. Mitigation Measure 4.2-1d includes assessment and repair of the existing fencing prior to project implementation such that turtles would be excluded from the site.

Comment I74-22 Response: Blue elderberry shrubs in the Parkway and near the project's construction footprint would be protected by Mitigation Measure 4.2-1c, which includes flagging of all blue elderberry shrubs within 165 feet of the construction footprint and an avoidance area of 20 feet from shrub driplines. This measure is consistent with U.S. Fish and Wildlife Service recommendations for valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) (USFWS 2017).

Comment I74-23 Response: Nesting birds on and near the proposed project site would be protected by Mitigation Measure 4.2-1e, which includes preconstruction surveys and no-disturbance buffers during active construction activities.

Comment I74-24 Response: The Draft EIR evaluates potential project impacts on migratory birds under Impact 4.2-1 (pages 4.2-17 through 4.2-24) and Impact 4.2-4 (pages 4.2-24 and 4.2-25).

Comment I74-25 Response: The Draft EIR evaluates potential project impacts on native wildlife corridors under Impact 4.2-4 (pages 4.2-24 and 4.2-25).

Comment I74-26 Response: Potential wildland fire hazards are evaluated in Draft EIR Section 5.7, "Hazards and Hazardous Materials," under Impact 5.7-6, and Section 5.15, "Wildland Fire Hazards." The analysis considers the project's location adjacent to

the American River Parkway, surrounding land uses, and applicable fire hazard severity zone designations. The Draft EIR correctly concludes that installation and operation of the proposed improvements at the existing developed project site would not exacerbate wildland fire risks. The situation described by the commenter, related to the potential for accidental (illegal) fires in homeless encampments within the Parkway, or fires caused by illegal fireworks in the Parkway, to spread onto the project site, are not impacts that would be caused by the proposed project and would be the result of illegal activities; therefore, these situations do not require evaluation in the Draft EIR. If the situations mentioned by the commenter were to occur in the Parkway, they would be law enforcement matters. No changes to the Draft EIR are required.

Comment I74-27 Response: The Rio Americano High School cell tower is included in the cumulative impact analysis presented in Draft EIR Section 7.1.3, "Cumulative Impact Analysis," and is identified in Table 7-1 (page 7-2). The Draft EIR identifies the cell tower as a 90-foot-tall monopole that would not be lit. Potential effects of the proposed stadium lighting and light standards on bird movement and migration are evaluated in Draft EIR Section 4.2, "Biological Resources," including Impacts 4.2-1 and 4.2-4. Please see also Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Biological Resources and Master Response 9: Cumulative Impacts.

Comment I74-28 Response: Construction and operational air quality and greenhouse gas emissions are evaluated in Draft EIR Sections 5.2, "Air Quality," and 5.6, "Greenhouse Gas Emissions." Cumulative impacts are evaluated in Draft EIR Section 7.1.3, "Cumulative Impact Analysis," which includes the Jesuit High School Stadium Lighting Project. The analysis considers operational vehicle trips and associated emissions from stadium events. Transportation-related vehicle miles traveled are evaluated in Draft EIR Section 4.4, "Transportation and Circulation," and Appendix F. The comment regarding potential future enrollment changes at Jesuit High School is noted.

Comment I74-29 Response: Please see response to comment I1-15.

Comment I74-30 Response: Draft EIR Section 4.4, "Transportation and Circulation," evaluates potential impacts on pedestrian and bicycle safety associated with stadium event traffic along American River Drive. The intersection of American River Drive and Estates Drive is included in the transportation study area. Mitigation Measure 4.4-3b requires implementation of an Event Transportation Management Plan that identifies designated pedestrian crossing locations and appropriate safety treatments, which may include high-visibility crosswalk markings, nighttime lighting, pedestrian crossing-warning signs, and other measures. The measure also requires monitoring and adjustments to the plan following the first highly attended nighttime event. Please see also Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation.

COMMENT LETTER I75. JOE O'CONNOR; OCTOBER 14, 2026

Response to Comment Letter I75. Joe O'Connor

Comment I75-1 Response: This comment letter (I75), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I75-2 through I75-14.

Comment I75-2 Response: Please see response to comment I1-1.

Comment I75-3 Response: Please see response to comment I1-2.

Comment I75-4 Response: Please see response to comment I1-3.

Comment I75-5 Response: Please see response to comment I1-4.

Comment I75-6 Response: Please see response to comment I1-5.

Comment I75-7 Response: Please see responses to comments I1-6 and I1-7.

Comment I75-8 Response: Please see response to comment I1-8.

Comment I75-9 Response: Please see response to comment I1-9.

Comment I75-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I75-11 Response: Please see response to comment I1-12.

Comment I75-12 Response: Please see response to comment I1-13.

Comment I75-13 Response: Please see response to comment I1-14.

Comment I75-14 Response: Please see response to comment I1-15.

COMMENT LETTER I76. KAREN OLSON; SEPTEMBER 28, 2026

Response to Comment Letter I76. Karen Olson

Comment I76-1 Response: Please see response to comment I1-1.

Comment I76-2 Response: Please see response to comment I1-2.

Comment I76-3 Response: Please see response to comment I1-3.

Comment I76-4 Response: Please see response to comment I1-4.

Comment I76-5 Response: Please see response to comment I1-5.

Comment I76-6 Response: Please see response to comment I1-6.

Comment I76-7 Response: Please see response to comment I1-7.

Comment I76-8 Response: Please see response to comment I1-8.

Comment I76-9 Response: Please see response to comment I1-9.

Comment I76-10 Response: Please see response to comment I1-10.

Comment I76-11 Response: Please see response to comment I1-11.

Comment I76-12 Response: Please see response to comment I1-12.

Comment I76-13 Response: Please see response to comment I1-13.

Comment I76-14 Response: Please see response to comment I1-14.

Comment I76-15 Response: Please see response to comment I1-15.

COMMENT LETTER I77. SUZANNA PARK; SEPTEMBER 11, 2026

Response to Comment Letter I77. Suzanna Park

Comment I77-1 Response: Responses to individual comments are provided in I77-2 through I77-8.

Comment I77-2 Response: Draft EIR Section 4.3, "Noise and Vibration," evaluates potential construction-related noise impacts on surrounding residences and includes Mitigation Measure 4.3-1a, which requires measures to reduce construction noise, including restrictions on construction hours, equipment controls, and notification of nearby residents. Despite implementation of feasible mitigation, construction-related noise impacts would remain significant and unavoidable. Draft EIR Section 4.4, "Transportation and Circulation" (pages 4.4-11 and 4.4-12), also evaluates temporary construction traffic and concludes that construction-related transportation hazards would be less than significant. No changes to the Draft EIR are required.

Comment I77-3 Response: Draft EIR Chapter 3, "Project Description," describes the proposed stadium improvements, including the expansion of bleacher seating from approximately 288 to 2,575 people, installation of four 80-foot-tall stadium light standards, and six 15-foot-tall pedestrian safety light standards along the existing paved fire lane between the stadium and the main campus parking lot. Draft EIR Table 3-1 (page 3-9) identifies anticipated stadium activities under the proposed project, including approximately five to eight home football games per year, graduation, and additional school assemblies or school-sanctioned community events. The Draft EIR's environmental impact analyses account for the anticipated increases in attendance and nighttime activities associated with these improvements. Potential impacts related to lighting, noise, and transportation are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.3, "Noise and Vibration," and 4.4, "Transportation and Circulation," respectively. No changes to the Draft EIR are required.

Comment I77-4 Response: Draft EIR Section 4.4, "Transportation and Circulation" (pages 4.4-12 through 4.4-17), evaluates parking demand associated with anticipated stadium attendance. The Draft EIR identifies approximately 672 on-campus parking spaces available for events, including overflow parking, and approximately 327 on-street spaces along identified segments of American River Drive and Saverien Drive. For a general football game scenario with 2,200 attendees, the Draft EIR estimates demand for approximately 823 parking spaces. For the conservatively high attendance scenario of 3,400 people, the Draft EIR estimates demand for approximately 1,295 parking spaces, which would exceed the identified on-campus and on-street supply. The Draft EIR acknowledges that parking demand during highly attended events could extend into surrounding neighborhoods and increase potential conflicts among pedestrians, bicyclists, and vehicles. Mitigation Measures 4.4-3a through 4.4-3c require a shared-parking arrangement with Jesuit High School, an Event Transportation Management Plan, and event-specific access and circulation management measures to address these potential impacts. The Draft EIR concludes that transportation safety impacts associated with event parking would be less than significant with mitigation. Please see also Master Response 6: Parking Availability. No changes to the Draft EIR are required.

Comment I77-5 Response: Draft EIR Section 4.4, "Transportation and Circulation," evaluates potential changes in traffic circulation and vehicle queuing associated with anticipated stadium attendance. As discussed on pages 4.4-13 and 4.4-14, the Local Transportation Analysis identifies potential vehicle queues extending beyond available turn-lane storage at Fair Oaks Boulevard and Saverien Drive during stadium events. The Draft EIR also identifies potential safety concerns associated with increased pedestrian and vehicle activity during highly attended events. Accordingly, Mitigation Measures 4.4-3a through 4.4-3c require shared off-site parking arrangements, preparation and implementation of an Event Transportation Management Plan, and event-specific access and circulation management measures. With implementation of these measures, the Draft EIR concludes that transportation safety impacts would be less than significant. Please see also Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I77-6 Response: Draft EIR Chapter 3, "Project Description," identifies four proposed 80-foot-tall stadium light standards and six 15-foot-tall pedestrian safety light standards along the existing paved fire lane between the stadium and the main campus parking lot. Draft EIR Section 4.1, "Aesthetics," evaluates potential nighttime lighting impacts on surrounding residences, including properties north and east of the school campus. The analysis incorporates project-specific lighting calculations prepared by Musco Lighting, provided in Draft EIR Appendix B, to evaluate light trespass, glare, and skyglow. The proposed stadium lighting would use directional fixtures designed to concentrate illumination within the stadium and minimize spillover onto adjacent properties. Mitigation Measure 4.1-2 further requires the stadium lighting design to obtain a "pass" rating from the International Dark Sky Association before construction. With implementation of this measure, the Draft EIR concludes that nighttime lighting impacts would be less than significant. After the Draft EIR was prepared, the District has since received the required "pass" rating for the proposed project's lighting design from the Dark Sky Association (attached to this FEIR as Appendix B). Please see also Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors. No changes to the Draft EIR are required.

Comment I77-7 Response: Draft EIR Section 4.3, "Noise and Vibration," evaluates potential operational noise impacts on surrounding residences associated with increased attendance, crowd activity, the public address system, and other stadium events. The analysis acknowledges that noise from high-attendance nighttime events could be clearly perceptible and disruptive to nearby residents. Mitigation Measure 4.3-1b requires stadium event noise controls, including a distributed public address system with volume controls, restrictions on artificial noisemakers, limits on amplified sound and band activity after 10:00 p.m., and noise-reducing features for bleachers and ramps where feasible. Although these measures would reduce operational noise, the Draft EIR concludes that stadium event noise impacts would remain significant and unavoidable. No changes to the Draft EIR are required.

Comment I77-8 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I78. PASTERSKI; OCTOBER 14, 2026

Response to Comment Letter I78. Pasterski

Comment I78-1 Response: The project objectives are identified in Draft EIR Section 3.4, "Project Objectives" (page 3-10), and include enhancing the Rio Americano High School campus as a Center of Community, improving athletic and non-athletic facilities, and enhancing the athletic experience for students and the school community. The comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR. No changes to the Draft EIR are required.

COMMENT LETTER I79. WILLIAM PEVEC; OCTOBER 13

Response to Comment Letter I79. William Pevec

Comment I79-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I79-2 Response: The Draft EIR contains a thorough, detailed analysis of the project's potential physical impacts on the environment. Detailed responses to the issues raised by the commenter are provided in 79-3 through 79-35, below.

Comment I79-3 Response: The Draft EIR evaluates impacts of construction and operation of the proposed project on wildlife in Impact 4.2-1 (pages 4.2-17 through 4.2-24) and Impact 4.2-4 (pages 4.2-24 and 4.2-25), including evaluation of protected species, like Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), the Modesto population of song sparrow (*Melospiza melodia*, pop. 1), and valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*). The Draft EIR includes Mitigation Measures 4.2-1a (Environmental Awareness Training), 4.2-1b (Best Management Practices for Biological Resources), 4.2-1c (Blue Elderberry Avoidance), 4.2-1d (Northwestern Pond Turtle Protections), and 4.2-1e (Nesting Bird Protections) to avoid and minimize impacts on wildlife species during project construction. The evaluation of operational impacts of the proposed project on wildlife species in Impacts 4.2-1 and 4.2-4 considers the existing environmental setting, frequency and timing of new stadium events, proximity of suitable habitat for native wildlife species, light and noise levels during new stadium events, and the nature of potential impacts to wildlife species in reaching less-than-significant determinations. Please see Master Response 2 for additional details regarding evaluation of operational light and noise impacts on biological resources in the Draft EIR.

Comment I79-4 Response: The Draft EIR evaluates the potential environmental impacts associated with project-related lighting and noise in Section 4.1, "Aesthetics," and Section 4.3, "Noise and Vibration." The Draft EIR is not required to evaluate "the potential for unruly behavior on the Parkway," which is not a physical environmental impact, and would be a law enforcement matter if it were to occur. No changes to the Draft EIR are required.

Comment I79-5 Response: Please see response to comment I1-12. No changes to the Draft EIR are required.

Comment I79-6 Response: The Draft EIR includes Mitigation Measure 4.1-1, which requires the District to obtain a "pass" rating from the Dark-Sky Association before the start of construction activities, thereby ensuring that the proposed project will meet the "modeling standards" as requested by the commenter. Furthermore, as shown in Attachment B to this FEIR, the required "pass" rating from the Dark Sky Association has been received. No changes to the Draft EIR are required.

Comment I79-7 Response: The Draft EIR evaluates bat foraging in Impact 4.2-1 (pages 4.2-18 through 4.2-21). The Draft EIR concludes that impacts of the proposed project on bat foraging are less than significant, not significant as indicated by the comment.

Comment I79-8 Response: The evaluation of operational impacts of the proposed project on wildlife species in Impacts 4.2-1 and 4.2-4 considers the existing environmental setting, frequency and timing of new stadium events, proximity of suitable habitat for native wildlife species, light and noise levels during new stadium events, and the nature of potential impacts to wildlife species in reaching less-than-significant determinations. Please see Master Response 2 for additional details regarding evaluation of operational noise impacts on biological resources in the Draft EIR.

Comment I79-9 Response: The Draft EIR notes under Impact 4.2-1 (page 4.2-19) that, "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." This sentence is specifically evaluating impacts of proposed project lighting on roosting bats and nesting birds, not all project impacts on wildlife. Cumulative impacts of the proposed project are evaluated in Section 7.1.3 of the Draft EIR (pages 7-2 through 7-13).

Comment I79-10 Response: The commenter's summary of Sacramento County Zoning Code Section 2.3.2 regarding the Parkway Corridor is noted.

Comment I79-11 Response: The commenter has submitted photographs in support of his allegation that the statements made in Draft EIR Section 4.1, "Aesthetics"—that the project site is not visible from the Jedediah Smith Memorial Trail due to the height of the intervening American River north bank levee flood control levee—are incorrect. As noted by the commenter, photos 2, 4, and 6 submitted by the commenter are greatly zoomed ("telephoto") images; these images do not reflect the view of the project site as perceived by the human eye. As clearly shown in the other photos submitted by the commenter (numbers 1, 3, and 5): the goalposts at the stadium are not visible in photo 1; the very tops of the goalposts and scoreboard in photo 3 are barely visible because the color and the thin lines blend in the with the surrounding environment, and would only be noticed if a person on the trail were to stop walking or bicycling, and stand and stare intently focused on the location noted by the commenter straining their eyes to see anything; and finally, the goalposts at the stadium are again not visible in photo 5. Draft EIR Photo Viewpoint KOP-7 (page 4.1-8) provides an appropriately representative viewpoint towards the project site. Regardless of where any viewer is positioned on the Jedediah Smith Memorial Trail, views of the project site are blocked due to the height of the levee and the intervening tall trees. Draft EIR Impacts 4.1-1 and 4.1-2 (pages 4.1-16 through 4.1-26) appropriately analyze the potential change in visual character and the potential impacts from nighttime glare and skyglow with visual simulations from a variety of locations including the Jedediah Smith Memorial Trail, appropriately demonstrating that only the tops of the proposed new light standards would be visible from the trail (Draft EIR page 4.1-18). No changes to the Draft EIR are required.

Comment I79-12 Response: Please see response to comment I79-11, above. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I79-13 Response: The commenter provides several quotations related to the County's Parkway Corridor Combining District from an unidentified source listed as "Sacramento

County 2024, page 2- 11." Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I79-14 Response: The proposed project is confined to the existing Rio Americano High School campus. The project's potential to introduce "unruly behavior" in the Parkway after dark when the Parkway is closed, or the project's potential to result in increased "litter" in the Parkway (again, after dark, when the Parkway is closed to public use), are not physical impacts on the environment from the proposed project, and therefore do not require analysis in the EIR. See response to Comment O7-46.

Comment I79-15 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. As detailed in Draft EIR pages 4.3-25 through 4.3-26, Mitigation Measure 4.3-1b identifies time limits for amplified music and band activity, prohibits artificial noisemakers, includes signage and announcements to manage crowd departure noise, and requires bleacher noise reducing design features. As explained in the Draft EIR, while the Sacramento County Noise Ordinance and the Sacramento County General Plan do not apply to the proposed Project, the County's noise standards were considered in evaluating noise impacts. Regarding the commenter's note that the County requires setbacks and design prior to considering noise barriers, setbacks for noise generating equipment are required and mitigation in the Draft EIR dictates the design of the public address system to reduce noise impacts. Regarding the request for bleacher and ramp design features to reduce noise impacts, please see Mitigation Measure 4.3-1b. Regarding the commenter's opinion that sound barriers should be considered, the District did consider noise barriers, but this is infeasible. In order to provide benefit, the noise barriers should need to break the line of sight between the noise source and the noise receptor, which is infeasible for a project where noise sources include bleachers and where the noise source is at a distance from the noise receptors. In addition, since the proposed Project is primarily shifting noise-generating events in time and adding a very limited number of new events that must currently be hosted elsewhere, it is infeasible to construct noise barriers to address infrequent events, particularly since the construction of noise barriers would introduce environmental effects (construction noise and air quality, for example).

Comment I79-16 Response: Noise from the high school campus parking lot that could be generated during events at Raider Stadium is evaluated in Draft EIR Impact 4.3-1, on pages 4.3-19 and 4.3-20. The Draft EIR appropriately concluded that the impact from on-campus parking would be less than significant (page 4.3-20). The commenter has not provided any evidence to support his allegation that this significance conclusion should be changed. No revisions to the Draft EIR are required.

Comment I79-17 Response: Please see Master Response 6: Parking Availability, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I79-18 Response: A plan that would address pedestrian safety from off-site parking, as requested by the commenter, is included in Draft EIR Mitigation Measure 4.4-3b (Draft EIR pages 4.4-15 and 4.4-16). See also, Master Response 7: Operations

Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I79-19 Response: The queueing that the commenter references is the reported 95th-percentile queue at one intersection for turning movements where the proposed project is anticipated to contribute additional traffic under conservative event assumptions for a peak event drawing in a crowd of 3,400 attendees, which is a reasonably foreseeable condition but one that would only could occur once or twice per year during events such as graduation or if a rivalry football game is highly attended. This queuing is not a typical condition that would result from the proposed project, but was considered for the purposes of the Draft EIR to ensure the analysis accounted for such peak events. With regards to the "emergency access plan" requested by the commenter, please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I79-20 Response: Please see Master Response 6: Parking Availability, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I79-21 Response: The "traffic management plan" suggested by the commenter is contained in Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (Draft EIR pages 4.4-15 and 4.4-16). No changes to the Draft EIR are required. See also, Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation

Comment I79-22 Response: A discussion as to the reasons why the level of impact would be reduced is presented on Draft EIR page 4.4-17, immediately after the mitigation measure text. Regarding how parking would be managed, see also, Master Response 6: Parking Availability, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I79-23 Response: The Draft EIR evaluated the continued use of El Camino High School for Rio Americano sports events in Alternative 1: No Project Alternative. As explained on Draft EIR page 6-4, holding future nighttime games at a different lighted stadium (e.g., 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, as evaluated in detail on Draft EIR pages 6-6 through 6-17. How such an alternative may affect the use of District funds does not pertain to the adequacy of the Draft EIR. (See *Goleta Union School Dist. v. Regents of Univ. of Cal.* (1995) 37 Cal.App.4th 1025, 1033–1034 [agency's consideration of alternatives is subject to the rule of reason; how effects are mitigated or how alternatives are selected, including funding implications, is left to the discretion of the lead agency].) Nonetheless, this comment is noted and provided as part of this Final EIR. No changes to the Draft EIR are required.

Comment I79-24 Response: The Draft EIR explains on page 4.4-11 how the trip distances were developed and used to inform vehicle miles traveled under various conditions, including existing and with implementation of the proposed project; this is also

further detailed in Appendix F, "Vehicle Miles Travelled Analysis," of the Draft EIR. As explained in Appendix F, trip distances for attendees are calculated from Geographical Information System (GIS) functions in the TransCAD modeling package to optimize travel time from origins to destinations. The Rio Americano High School home block groups, visiting school locations, and stadium locations are inputs for the multi-path analysis to identify logical paths and estimate driving distance for home and visiting attendees. This data supports the analysis in the Draft EIR, including trip distances and vehicle miles travelled for No changes to the Draft EIR are required.

Comment I79-25 Response: The Jesuit High School Lighting Project is included in the project's cumulative impact analyses for all topic areas as shown in Draft EIR Table 7-1, "List of Cumulative Projects" (page 7-2), and as addressed for all topic areas in Chapter 7, which include traffic, parking, and emergency access, as raised by the commenter. Please also refer to Master Response 9: Cumulative Impacts for further discussion. No changes to the Draft EIR are required.

Comment I79-26 Response: Please see Master Response 6: Parking Availability.

Comment I79-27 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the Draft EIR; the comment is noted.

Comment I79-28 Response: The commenter's preference for the No Action Alternative (i.e., continued use of the El Camino High School for Rio Americano High School sports events) is noted.

Comment I79-29 Response: The Draft EIR contains a thorough and complete analysis of the project's potential physical impacts on the environment, and includes feasible, enforceable mitigation measures (where necessary) to reduce the level of impact. The commenter's disagreement with the conclusions presented in the Draft EIR is noted, and specific concerns raised throughout this comment letter are addressed through responses to comments I79-1 through I79-28. No changes to the Draft EIR are required.

Comment I79-30 Response: With regards to the photographs submitted by the commenter, please see response to comment 79-11.

Comment I79-31 Response: With regards to the photographs submitted by the commenter, please see response to comment 79-11.

Comment I79-32 Response: With regards to the photographs submitted by the commenter, please see response to comment 79-11.

Comment I79-33 Response: With regards to the photographs submitted by the commenter, please see response to comment 79-11.

Comment I79-34 Response: With regards to the photographs submitted by the commenter, please see response to comment 79-11.

Comment I79-35 Response: With regards to the photographs submitted by the commenter, please see response to comment 79-11.

COMMENT LETTER I80. DARA PFEIFFER; SEPTEMBER 26, 2026

Response to Comment Letter I80. Dara Pfeiffer

Comment I80-1 Response: This comment letter (I80), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I80-2 through I80-16.

Comment I80-2 Response: Please see response to comment I1-1.

Comment I80-3 Response: Please see response to comment I1-2.

Comment I80-4 Response: Please see response to comment I1-3.

Comment I80-5 Response: Please see response to comment I1-4.

Comment I80-6 Response: Please see response to comment I1-5.

Comment I80-7 Response: Please see response to comment I1-6.

Comment I80-8 Response: Please see response to comment I1-7.

Comment I80-9 Response: Please see response to comment I1-8.

Comment I80-10 Response: Please see response to comment I1-9.

Comment I80-11 Response: Please see response to comment I1-10.

Comment I80-12 Response: Please see response to comment I1-11.

Comment I80-13 Response: Please see response to comment I1-12.

Comment I80-14 Response: Please see response to comment I1-13.

Comment I80-15 Response: Please see response to comment I1-14.

Comment I80-16 Response: Please see response to comment I1-15.

COMMENT LETTER I81. LISA PHENIX; SEPTEMBER 22, 2026

Response to Comment Letter I81. Lisa Phenix

Comment I81-1 Response: This comment letter (I81), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I81-2 and I81-3.

Comment I81-2 Response: The Draft EIR was published on September 2, 2026. The 45-day public review and comment period began on September 2, 2026 and ended on October 16, 2026. The District approved the Cell Tower Project on June 10, 2025 (Resolution No. 4212). In doing so, the District determined that the project was exempt from further CEQA review pursuant to CEQA Guidelines, sections 15303 and 15314 (i.e., the "Class 3" and "Class 14" categorical exemptions, respectively). Please see additional details contained in Master Response 9: Cumulative Impacts.

Comment I81-3 Response: Details related to the Cell Tower Project are contained in Master Response 9: Cumulative Impacts.

COMMENT LETTER I82. LISA PHENIX; OCTOBER 15, 2026

Response to Comment Letter I82. Lisa Phenix

Comment I82-1 Response: As stated on Draft EIR page 3-1, and stated throughout the other chapters and topic area sections of the Draft EIR, the project site consists of the existing Raider Stadium, which is comprised of an artificial turf field with an eight-lane synthetic track surrounding the field perimeter, a freestanding scoreboard, a public address system, and bleacher seating. No changes to the Draft EIR are required.

Comment I82-2 Response: The reference by the District to preparation of a Focused Draft EIR at public meetings, as mentioned by the commenter, is related to the CEQA Guidelines. A lead agency may prepare and circulate an Initial Study that identifies topic areas where there would be no impact or where impacts would clearly be less than significant, thereby "focusing" the Draft EIR on topic areas that may have potentially significant and/or significant impacts (CEQA Guidelines Section 15081, 15082). The Draft EIR comprehensively evaluated all resource areas identified in the CEQA Guidelines Appendix G Checklist, and topic areas where there would be no impact or where impacts would clearly be less than significant are evaluated in Draft EIR Chapter 5, "Effects Found To Be Less Than Significant."

Comment I82-3 Response: As discussed in Draft EIR Chapter 3, "Project Description," and Section 4.3, "Noise and Vibration," the existing Raider Stadium has bleacher seating for approximately 288 people, and noise is already being created by existing school sports events held during both the afternoon, and during some evening hours with the use of portable diesel-powered lighting. Moreover, the existing Raider Stadium has an existing public address system that is used for sports events, and therefore existing sports events noise from the public address system is already occurring. Contrary to the commenter's assertion, there is no deficiency in restrooms. With regard to the commenter's alleged "lack of meaningful evacuation plan improvement," please see responses to comments I82-31 and I82-32.

Comment I82-4 Response: The Draft EIR includes an appropriate analysis of the project's physical impacts on the environment from construction and operation, including the frequency, duration, and attendance of events at Raider Stadium (described in Draft EIR Chapter 3, "Project Description"), and cumulative impacts (Draft EIR Chapter 7, "Cumulative Impacts and Other CEQA Considerations"). Pedestrian and bicycle safety are evaluated in Draft EIR Section 4.4, "Transportation and Traffic." No changes to the Draft EIR are required.

Comment I82-5 Response: The Draft EIR includes an analysis of the No Project (no build) alternative, along with an alternative that is designed to reduce the project's significant noise impact (Draft EIR Chapter 6, "Alternatives"). Other alternatives that were considered but not carried forward for further consideration are discussed in Draft EIR Chapter 6, pages 6-3 and 6-4. Please see also Master Response 6: Alternatives. No changes to the Draft EIR are required.

Comment I82-6 Response: All comments received by the District on the NOP were considered during preparation of the Draft EIR. Responses to individual comments provided on the Draft EIR are included in this FEIR. In addition, the District hosted an in-person meeting on October 13th, 2025, an in-person design review meeting on August 27th, 2026, created and publicized a regularly updated webpage, provided email updates through the course of design and environmental review to those signing up via the project website, sent out mailers to addresses around the campus (first mailer to a ¼ mile radius and three mailers using a ½ mile radius), communicated with Rio Americano staff, students, and families via emails, phone calls, newsletters, and the school website, and placed a banner along the frontage of the school site to promote awareness of the project. All comments were considered by the District in relation to the design and operational/management strategies. NOP comments and comments on the Draft EIR are published within the FEIR. The NOP directed respondents to "provide your written comments…to…Nicholas Arps, Director of Facilities Construction & Modernization, San Juan Unified School District, 3738 Walnut Avenue, Carmichael, CA 95608, construction@sanjuan.edu." As noted, NOP comments were used in developing the scope of analysis and the Draft EIR, and responses to all comments on the Draft EIR are included in the FEIR, including those that have suggested minor revisions to the Draft EIR included as a part of the "Errata" chapter of the Final EIR.

Comment I82-7 Response: The comment letter (not just the email) referred to by the commenter is, in fact, attached as part of Draft EIR Appendix A, on pages 151 and 152. No changes to the Draft EIR or Administrative Record are required.

Comment I82-8 Response: Please see response to comment IX-6.

Comment I82-9 Response: All appendices to the Draft EIR, along with main body of the Draft EIR, were circulated for agency and public review and were available for download from the District's website at sanjuan.edu/riostadium and the State Clearinghouse website. The District complied with its posting obligations under CEQA. The District published the NOP, the NOA, and the Draft EIR to the SCH website. The NOA indicates where the Draft EIR's appendices can be found. CEQA requires only that these notices and draft documents be published to the SCH website so that State responsible agencies can review them. All other environmental review documents can be published on the lead agency's website, which is what the District did here, as further indicated in the NOA. That the District did not post the appendices directly to the SCH website did not preclude informed decision making or the public's ability to review them. Nothing further was required. (Pub. Resources Code, §§ 21082.1, 21152; CEQA Guidelines § 15205.)

Comment I82-10 Response: With regard to the commenter's request that the Draft EIR analyze "all meaningful alternatives," including the specific additional alternatives suggested by the commenter, please see responses to comments I47-3 and I47-20, and Master Response 8: Alternatives. Furthermore, the commenter suggests alternatives including continuing to use Rio Americano High School gym and community building, shifting practices to early morning and daytime, and bussing students to El Camino High School for use of this school's existing stadium; these are all part of the existing operations and the No Project Alternative presented in the Draft EIR. The commenter also suggests the use of

battery-powered electric lights; the commenter does not identify any potentially significant impact that such lights would reduce relative to the proposed project, and such sights would not provide the advance technology that the proposed stadium lights offer, as described in Master Responses 2 and 3. No changes to the Draft EIR are required.

Comment I82-11 Response: Although the applicable Parkway Plan policies have been included in the Draft EIR for informational purposes, these policies are not applicable to the proposed project. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I82-12 Response: The Draft EIR's conclusion that the elevated levee and existing trees block many views of the stadium from portions of the Parkway is substantiated in Draft EIR Section 4.1, "Aesthetics," as shown in representative photo viewpoints KOP-6 and KOP-7 (Draft EIR pages 4.1-6 and 4.1-8), and visual simulations 2a and 2b (Draft EIR pages 4.1-21 and 4.1-22). The aesthetics analysis contained on Draft EIR pages 4.1-16 through 4.1-26 appropriately distinguishes relevant viewpoints and evaluates the potential impacts from public locations where the project would be visible. With regard to consistency with Parkway policies, please see response to comment I82-11 and Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I82-13 Response: The commenter's restatement of the project components and number of events at Raider Stadium as contained in Draft EIR Chapter 3, "Project Description," is noted. The Draft EIR analysis the potential physical environmental impacts from increased illumination and attendance, as explained in response to comment I1-1. Regarding the commenter's request that "these estimates" (referring to attendance in Draft EIR Table 3-1, page 3-9) "need to become clear, and include binding limits on actual operations," please see response to comment I47-4. No changes to the Draft EIR are required.

Comment I82-14 Response: The "pass" rating from the DarkSky Association required by Draft EIR Mitigation Measure 4.1-2 has been received, and is attached to this FEIR as Appendix B. Please see Master Response 10: Accurate, Stable, and Finite Project Description with regarding to operational use. The Project Description (page 3-8) establishes that 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 lights would be used as designed and there is no reason to assume that they would be left on when not in use. Finally, the project does not proposed to remove any tress; existing trees would continue to be in place with implementation of the proposed project.

Comment I82-15 Response: An alternative that would reduce the project's operational noise levels is evaluated in the Draft EIR: this is Alternative 2: Reconfigure Stadium and

Athletic Fields, which is described on Draft EIR page 6-5. No changes to the Draft EIR are required.

Comment I82-16 Response: The noise analysis requested by the commenter, related to events where a higher occurrence may occur and therefore a higher level of noise may be generated, is contained in Draft EIR Section 4.3, "Noise and Vibration" (see Impact 4.3-1, pages 4.3-16 through 4.3-27). See also response to Comment I69-19 regarding noise levels across the American River. No changes to the Draft EIR are required.

Comment I82-17 Response: Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 and 4.3-26) encompasses the noise-control measures suggested by the commenter. The District declines to add the suggested additional mitigation measure committing to "remove it speakers" at Raider Stadium solely because the commenter or other residents decide that the public address system constitutes a "public nuisance." Draft EIR Mitigation Measure 4.3-1b contains a suite of specific, enforceable measures that would appropriately limit noise disruption. The Draft EIR does not discount the environmental impacts of the proposed Raider Stadium because they are "intermittent" nor has the commenter provided any evidence that the Draft EIR does so. The Draft EIR fully evaluates all sports events as described in Draft EIR Table 3-1 (page 3-9) throughout all of the topic area sections. The Draft EIR appropriately evaluates the No Project Alternative as required by CEQA, as well as Alternative 2: Reconfigure Stadium and Athletic Fields (which would reduce the project's significant noise impacts). Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I82-18 Response: The commenter's opinion that the Parkway and the Lower American River "will likely be affected by light, noise, and increased nighttime activity even when construction and ongoing use stays within school property" is noted. The Draft EIR thoroughly analyzes potential physical environmental impacts to the Parkway related to light and noise, as explained in response to comment I1-1. No changes to the Draft EIR are required.

Comment I82-19 Response: The commenter's personal opinion that increased nighttime attendance at sports events held at Raider Stadium could result in an increase in attendees unlawfully entering the Parkway at night is noted. If that were to happen, it would be a law enforcement matter; this does not represent a physical impact on the environment. (CEQA Guidelines Section 15131(a) ["social effects of a project shall not be treated as significant effects on the environment"].) No changes to the Draft EIR related to this issue are required.

AECOM agrees that the absence of observed emergence from the surveyed trees does not establish that the surrounding corridor is free of wildlife impacts or that nighttime operations would have no effect. Emergence surveys were conducted along the tree corridor to support analysis of potential impacts to those potential roost trees. Other variables were considered for analysis of other potential impacts to bats and bat habitat that were determined to be less than significant, as described in Draft EIR Section 4.2, "Biological Resources" and Appendix C.

Comment I82-20 Response: Draft EIR Section 4.2, "Biological Resources," evaluates both direct and indirect impacts during construction and operation, including impacts associated

with lighting, noise, disturbance, nesting birds, wildlife movement, and the use of adjacent habitat. The Draft EIR evaluation of biological resources was conducted by qualified biologists with experience in the species and habitat of the Parkway and lower American River corridor.

The Draft EIR includes the appropriate level of analysis for potential impacts to native species. The Draft EIR considers special-status and protected species with the potential to be impacted by the proposed project (see Table 4.2-1 on pages 4.2-4 through 4.2-7 and Impact 4.2-1 on pages 4.2-15 through 4.2-24) and native wildlife movement corridors and nursery sites (see Impact 4.2-4 on pages 4.2-24 through 4.2-25). See responses to Comment-O4B-64 and Comment-O4B-65 regarding the need for additional surveys.

See Master Response 2 regarding the evaluation of operational noise and lighting impacts of the proposed project on native wildlife. Mitigation is not necessary for these less-than-significant impacts.

Comment I82-21 Response: The evaluation of potential impacts of the proposed project and implementation of mitigation measures, as applicable, is provided throughout Draft EIR Chapter 4 for each resource topic, including consideration of potential direct and indirect impacts on the nearby American River Parkway. With regard to issues related to compliance with the American River Parkway Plan policies, please see response to comment I82-11, I82-19, and Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. Adding a Parkway entrance gate that can be locked, as suggested by the commenter, would not reduce the severity of any identified physical impact on the environment. No changes to the Draft EIR are required.

Comment I82-22 Response: The commenter restates the results of the vehicle queuing analysis in Draft EIR Appendix E and summarized in Draft EIR Impact 4.4-3 (pages 4.4-13 and 4.4-14). The commenter also restates the results of the parking analysis in Draft EIR Appendix E and summarized in Draft EIR Impact 4.4-3 (pages 4.4-12 and 4.4-13). The commenter's statement that "large events will place substantial pressure on nearby streets and intersections" does not constitute an inadequacy or inconsistency in the Draft EIR. The "two transportation analyses" referred to by the commenter (which the District assumes refers to Draft EIR Appendices E and F) use the same assumptions regarding the share of attendees who walk, bike, or are already on campus. Furthermore, Draft EIR Section 4.4, "Transportation and Circulation," provides a consistent analysis of trip generation, intersection delay, queueing, and parking demand under both typical and conservative event conditions. No changes to the Draft EIR are required.

Comment I82-23 Response: The staging area referred to by the commenter, associated with the American River Common Features Project (ARCF), Erosion Contract 3B, North Site 4-2, is shown on Figure 3.5.2-7 (page 3-34) of the ARCF Comprehensive SEIS/SEIR prepared by the U.S. Army Corps of Engineers (USACE), Sacramento District[4]. However, the access route to the staging area would be the levee crown

[4] Available: https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/_ARCF%20Final%20SEIS-SEIR%20Document%2009MAY25.pdf?ver=LG0SUUZjm7tJTWNXyKZiFA%3d%3d.

maintenance road, as also shown on page 3-34 of the ARCF Comprehensive SEIS/SEIR, not American River Drive. The nearest access to the levee crown maintenance road would be along the vacant lot adjacent to the Sacramento County Recorder's and Assessor's office, approximately 1.25 miles east of the Rio Americano High School campus (as also shown on Figure 3.5.2-7, page 3-34 of the ARCF Comprehensive SEIS/SEIR). Thus, the USACE and/or its construction contractors would not be driving trucks on American River Drive "close to and past Rio" or accessing side streets to drive onto the levee, as explained in detail in the ARCF Comprehensive SEIS/SEIR Chapter 3, "Description of Project Alternatives." Thus, traffic from the ARCF project on American River Drive does not need to be factored into the project's cumulative traffic analysis, and no changes to the Draft EIR are required. Please see also Master Response 9: Cumulative Impacts.

Comment I82-24 Response: The commenter's assertions regarding people who use American River Drive to access various locations in the area are noted. The commenter's request to revise the Draft EIR's traffic modeling to include every potential location for every potential reason why members of the public might travel on American River Drive is unnecessary; the traffic analysis contained in the Draft EIR Appendices E and F and Section 4.4, "Transportation and Circulation," appropriately analyze affected circulation facilities. The commenter's request that the District contact the Wilhaggin Del Dayo Neighborhood Association (a neighborhood that is approximately 1 mile west of the project site) to request feedback as to how to "most safely add the expected traffic increase at Rio" is also unnecessary. Any agency or member of the public was welcome to submit comments during the NOP and the Draft EIR comment period; the Wilhaggin Del Dayo Neighborhood Association did not submit any comments. No changes to the Draft EIR are required.

Comment I82-25 Response: The commenter's suggested traffic and event parking management plan is included in Draft EIR Mitigation Measure 4.4-3b (page 4.4-15). With regard to off-street parking, please see Master Response 6: Parking Availability. The commenter's requests that the Draft EIR (1) prohibit event-related parking in designated neighborhood streets where it would block driveways, restrict access, or create safety hazards, provide adequate enforcement to make restrictions effective; and (2) require event staffing and traffic control at key intersections and access points, with a plan for managing queues and protecting pedestrian and bicycle movements; are included in Draft EIR Mitigation Measure 4.4-3b and 4.4-3c (pages 4.4-15 and 4.4-16). As discussed in detail in Draft EIR Appendix E and the impact analyses contained in Draft EIR Section 4.4, "Transportation and Circulation," no intersection improvements are required, nor has the commenter submitted any evidence demonstrating that such improvements would be necessary. Mitigation Measure 4.4-3b includes the commenter's requested review of traffic as part of the review of the Event Transportation Management Plan that would occur following the first high-attendance sports event. The commenter's request that advance notice be provided before events at the sports stadium is included in Mitigation Measure 4.4-3b. No changes to the Draft EIR are required.

Comment I82-26 Response: The commenter's opposition to the use of nearby public street parking for Rio Americano High School sports event parking is noted. However, absent substantial evidence that shows the use of nearby public street parking will result

in an adverse physical impact on the environment, or will result in any secondary adverse environmental effects at the project site, concerns about parking are not considered significant impacts under CEQA. Therefore, no further response is required and no changes to the Draft EIR are necessary. (See *Save Our Access etc. v. Watershed Conservation Auth.* (2021) 68 Cal.App.5th 8, 24–25; *San Franciscans Upholding the Downtown Plan v. City & County of San Francisco* (2002) 102 Cal.App.4th 656, 697.)

Comment I82-27 Response: The requested specific location of the cell tower at Rio Americano High School is described in the first row of Draft EIR Table 7-1 (Draft EIR page 7-2). With regard to the information requested by the commenter regarding access to the cell tower, the cell tower would be fenced so that only authorized personnel can enter. For more information, please see Master Response 9: Cumulative Impacts. No changes to the Draft EIR are required.

Comment I82-28 Response: With regard to the commenter's request that the Draft EIR cumulative analysis also include any other proposed changes at the Rio Americano High School campus identified in the District's Facilities Master Plan, please see Master Response 9: Cumulative Impacts.

Comment I82-29 Response: The traffic management plan suggested by the commenter is contained in Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (pages 4.4-15 and 4.4-16). No changes to the Draft EIR are required.

Comment I82-30 Response: See Response to Comment I82-23 and Master Response 9: Cumulative Impacts. In addition with regard to equipment noise and vibration and dust generation, such impacts are localized in nature and, in the case that there would be any concurrent activity from the American River Common Features Project in the vicinity of Rio Americano High School, the proposed American River Common Features Project activities are minimal in this area and include revegetation and a staging area. Such activities, in combination with the proposed project, would not generate noise, vibration, or air quality effects that would result in cumulatively considerable impacts.

Comment I82-31 Response: The commenter's opinion that the District has a problem under existing conditions if the Rio Americano High School campus were to require evacuation is factually incorrect and is unsupported by any evidence. The commenter's opinion that the proposed project would expose the District to additional liability, from the commenter's perceived inability of the campus to handle increased sports event traffic in the event of a necessary evacuation, is also noted. Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required

Comment I82-32 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I82-33 Response: The proposed construction schedule requested by the commenter is contained in Draft EIR Chapter 3, "Project Description," page 3-10. No changes to the Draft EIR are required.

Comment I82-34 Response: The proposed project would not involve any work within or immediately adjacent to the American River flood control north levee as shown in Draft EIR Exhibit 3-3 (Draft EIR page 3-5), and therefore no coordination with flood control agencies is necessary. No changes to the Draft EIR are required.

Comment I82-35 Response: The commenter's request that construction staging, equipment, material storage, and parking should remain within approved areas on the school property in stated in Draft EIR Chapter 3, "Project Description": the proposed staging area is the main campus property south of American River Drive. The commenter's suggestion that the Draft EIR should include "enforceable measure to assure construction does not spill over into the Parkway" is unnecessary because Chapter 3, "Project Description" Exhibit 3-3 (Draft EIR page 3-5), clearly shows the limits of project-related work, which would be confined solely to the Rio Americano High School campus. The Draft EIR contains feasible mitigation measures, where necessary, to reduce potentially significant and significant impacts. Where impacts have been identified as less than significant (e.g., hydrology and water quality impacts evaluated on Draft EIR pages 5.8-27 through 5.8-29), no mitigation measures are required.

The commenter's request that the Draft EIR establish a documented complaint-response process, to inform District regarding neighbor and Parkway concerns relating to construction, is contained in Draft EIR Mitigation Measure 4.3-1a (Draft EIR page 4.3-24). No changes to the Draft EIR are required.

Comment I82-36 Response: All mitigation measures contained in the Draft EIR are specific, measurable, enforceable, and funding is available. The commenter's request that the District identify who is responsible for implementing each measure, when it must be completed, and how compliance will be verified will be contained a Mitigation Monitoring and Reporting Program, which the District is required to adopt under CEQA if and when the District certifies the EIR. Regarding the commenter's note that mitigation measures need to use the terms "shall" and "must," the applicable mitigation measures of the Draft EIR have been revised to use this terminology, rather than using the term "should." These edits are provided in Chapter 3, "Errata," of this Final EIR.

Comment I82-37 Response: The commenter's request for the District to provide a process for residents to report problems associated with campus sports events is contained in Draft EIR Mitigation Measure 4.3-1a (Draft EIR page 4.3-24). No changes to the Draft EIR are required.

Comment I82-38 Response: With regards to the commenter's request that the Draft EIR be revised to include "all reasonable alternatives," please see Master Response 8: Alternatives. The commenter's suggestion that an alternative should be provided to reduce noise impacts on the residential neighborhoods and the Parkway is analyzed in Draft EIR Chapter 6, "Alternatives," as Alternative 2: Reconfigure Stadium and Athletic Fields. With regards to the commenter's request that the Draft EIR "evaluate reduced capacity, reduced illumination, limits on permanent lighting, and strictest operating restrictions where these measures could avoid or reduce significant impacts," which the District assumes refers to additional alternative(s), this is the No Project Alternative, which is analyzed in Draft EIR Chapter 6, "Alternatives." See also Master Response 8: Alternatives. With regard

to the commenter's request that the Draft EIR "complete a robust consistency analysis under the Urban American River Parkway Preservation Act and the American River Parkway Plan," please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. With regard to the commenter's request to "reconcile the transportation assumptions and demonstrate a feasible parking and traffic-management strategy for both typical and high attendance events," there are no assumptions to be reconciled, feasible parking has been identified in Draft EIR Impact 4.4-3 and Mitigation Measure 4.4-3a (pages 4.4-12 and 4.4-13), and a traffic management strategy is required as part of Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (pages 4.4-15 and 4.4-16). Where the Draft EIR has identified potentially significant or significant impacts, enforceable mitigation measures are included. No mitigation measures are required for less than significant impacts. Finally, the cumulative analysis contained in Draft EIR Section 7.1.3 "Cumulative Impact Analysis," (pages 7-2 through 7-13) explains how any identified potentially significant or significant cumulative impacts would be avoided or reduced, where feasible. No changes to the Draft EIR are required.

The commenter's request that the District select the feasible alternative that provides the greatest environmental protection is noted. The Draft EIR includes effective mitigation that would reduce the project's physical environmental impacts.

The commenter's letter has been included in the administrative record, and written responses to comments are provided above in I82-2 through I82-38.

COMMENT LETTER I83. PATRICIA PRENDERGFAST; SEPTEMBER 27, 2026

Response to Comment Letter I83. Patricia Prendergast

Comment I83-1 Response: This comment letter (I83), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I83-2 through I83-16.

Comment I83-2 Response: Please see response to comment I1-1.

Comment I83-3 Response: Please see response to comment I1-2.

Comment I83-4 Response: Please see response to comment I1-3.

Comment I83-5 Response: Please see response to comment I1-4.

Comment I83-6 Response: Please see response to comment I1-5.

Comment I83-7 Response: Please see response to comment I1-6.

Comment I83-8 Response: Please see response to comment I1-7.

Comment I83-9 Response: Please see response to comment I1-8.

Comment I83-10 Response: Please see response to comment I1-9.

Comment I83-11 Response: Please see response to comment I1-10.

Comment I83-12 Response: Please see response to comment I1-11.

Comment I83-13 Response: Please see response to comment I1-12.

Comment I83-14 Response: Please see response to comment I1-13.

Comment I83-15 Response: Please see response to comment I1-14.

Comment I83-16 Response: Please see response to comment I1-15.

COMMENT LETTER I84. JUDY PRESS; OCTOBER 15, 2026

Response to Comment Letter I84. Judy Press

Comment I84-1 Response: Please see responses to comments I1-1 and I1-2.

Comment I84-2 Response: Please see response to comment I1-1.

Comment I84-3 Response: Please see response to comment I1-2.

Comment I84-4 Response: Please see response to comment I1-3.

Comment I84-5 Response: Please see response to comment I1-4.

Comment I84-6 Response: Please see response to comment I1-5.

Comment I84-7 Response: Please see responses to comments I1-6, I1-7, and I1-8.

Comment I84-8 Response: Please see response to comment I1-9.

Comment I84-9 Response: Please see response to comment I1-10 and I1-11.

Comment I84-10 Response: Please see response to comment I1-12.

Comment I84-11 Response: Please see response to comment I1-13.

Comment I84-12 Response: Please see response to comment I1-14.

Comment I84-13 Response: Please see response to comment I1-15.

COMMENT LETTER I85. MARYBETH PRIMEAU; OCTOBER 14, 2026

Response to Comment Letter I85. Marybeth Primeau

Comment I85-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I85-2 Response: Please see response to comment I79-2.

Comment I85-3 Response: Please see response to comment I79-3.

Comment I85-4 Response: Please see response to comment I79-4.

Comment I85-5 Response: Please see response to comment I79-5.

Comment I85-6 Response: Please see responses to comments I79-6 and I79-7.

Comment I85-7 Response: Please see response to comment I79-8.

Comment I85-8 Response: Please see response to comment I79-9.

Comment I85-9 Response: Please see response to comment I79-10 and I79-11.

Comment I85-10 Response: Please see response to comment I79-12 and I79-13.

Comment I85-11 Response: Please see response to comment I79-14.

Comment I85-12 Response: Please see response to comment I79-15.

Comment I85-13 Response: Please see response to comment I79-16.

Comment I85-14 Response: Please see response to comment I79-17.

Comment I85-15 Response: Please see response to comment I79-18.

Comment I85-16 Response: Please see response to comment I79-19.

Comment I85-17 Response: Please see response to comment I79-20.

Comment I85-18 Response: Please see response to comment I79-21.

Comment I85-19 Response: Please see response to comment I79-22.

Comment I85-20 Response: Please see response to comment I79-23.

Comment I85-21 Response: Please see response to comment I79-24.

Comment I85-22 Response: Please see response to comment I79-25.

Comment I85-23 Response: Please see response to comment I79-26.

Comment I85-24 Response: Please see response to comment I79-27.

Comment I85-25 Response: Please see response to comment I79-28.

Comment I85-26 Response: Please see response to comment I79-29.

COMMENT LETTER I86. CATHRYN RAKICH; OCTOBER 4, 2026

Response to Comment Letter I86. Cathryn Rakich

Comment I86-1 Response: This comment letter (I86), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I86-2 through I86-6.

Comment I86-2 Response: The commenter's opposition to the proposed project is noted.

Comment I86-3 Response: Please see response to comment I1-1.

Comment I86-4 Response: Please see responses to comments I1-4 and I1-2.

Comment I86-5 Response: Please see response to comment I1-1.

Comment I86-6 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I87. FRANCESCA REITANO; OCTOBER 15, 2026

Response to Comment Letter I87. Francesca Reitano

Comment I87-1 Response: Please see response to comment I1-1.

Comment I87-2 Response: Please see response to comment I1-2.

Comment I87-3 Response: Please see response to comment I1-3.

Comment I87-4 Response: Please see response to comment I1-4.

Comment I87-5 Response: Please see response to comment I1-5.

Comment I87-6 Response: Please see responses to comments I1-6 and I1-7.

Comment I87-7 Response: Please see response to comment I1-8.

Comment I87-8 Response: Please see response to comment I1-9.

Comment I87-9 Response: Please see responses to comments I1-10 and I1-11.

Comment I87-10 Response: Please see response to comment I1-12.

Comment I87-11 Response: Please see response to comment I1-13.

Comment I87-12 Response: Please see response to comment I1-14.

Comment I87-13 Response: Please see response to comment I1-15.

Comment I87-14 Response: The Draft EIR thoroughly considers all of the project's potential physical impacts on the environment, including wildlife, habitat, and recreation in the Parkway as requested by the commenter (see Draft EIR Section 4.2, "Biological Resources," and Section 5.13, "Recreation").

COMMENT LETTER I88. ALAN RHODES; OCTOBER 16, 2026

Response to Comment Letter I88. Alan Rhodes

Comment I88-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I88-2 Response: Please see Master Response 2: Nighttime Light and Glare and Noise Impacts on Wildlife.

Comment I88-3 Response: Limiting total event noise, including crowd noise and bleacher noise is not feasible. The commenter is correct in that Mitigation Measure 4.3-1b limits public address system noise and prohibits artificial noisemakers, among other items not identified by the commenter. The comment restates the reasons why the project's noise construction and operational noise impacts would remain significant and unavoidable after implementation of mitigation (page 4.3-27).

Comment I88-4 Response: The soccer ambient noise measurements are for reference, but are not used for significance determination. Furthermore, this supports the fact that existing noise sources for events at the stadium are a part of existing conditions.

Comment I88-5 Response: Both stated reference distances are accurate and are explained in the context of the analysis in the Draft EIR.

Comment I88-6 Response: There is no need to model noise carry over the American River as requested by the commenter because the noise levels would generally decrease with distance (as explained in Draft EIR Impact 4.3-1). The nearest sensitive receptors where noise levels may exceed respective standards were modeled (see Draft EIR Appendix D). Although sound propagation across the American River may be influenced by open-water conditions and atmospheric temperature inversions, these conditions do not eliminate geometric spreading. Accordingly, stadium-event noise would be expected to decrease with distance across the river, although the magnitude of attenuation would vary with atmospheric conditions, source characteristics, and receptor location. Therefore, noise levels at more distant receptors across the American River, particularly considering topography and vegetation, would be expected to be lower than at the modeled receptors that included residences adjacent to the school property line, although actual levels would depend on source orientation, shielding, and atmospheric conditions. No changes to the Draft EIR are required.

Comment I88-7 Response: See Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife.

Comment I88-8 Response: See Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. CEQA requires that an EIR provide a good-faith effort at full disclosure and use reasonable methods, supported by substantial evidence, to evaluate potential environmental effects (CEQA Guidelines §§15144, 15151). CEQA does not require speculative or infeasible analyses, nor does it require data that cannot reasonably be obtained (CEQA Guidelines §15144; Laurel Heights Improvement Assn. v. Regents of Univ. of California (1988) 47 Cal.3d 376, 404–405). Use of surrogate or analogous sites is an accepted and common

practice when project-specific data are unavailable or when the project site cannot accommodate the activity being analyzed.

Rio Americano High School currently lacks a home stadium capable of hosting varsity football games; such events are typically held at El Camino High School. Because it is not possible to conduct site-specific noise monitoring for a varsity football game at Rio Americano, the EIR reasonably relied on reference measurements from a comparable event at El Camino High School, which reflects the actual conditions and crowd sizes expected for the project. The analysis conservatively applied standard acoustic modeling techniques, including distance attenuation, to account for differences in geometry and receptor proximity. Where the proposed stadium would be closer to sensitive receptors, the analysis adjusted for these distances to ensure a conservative estimate of potential impacts. The Draft EIR acknowledges the use of a surrogate site (Draft EIR Page 4.3-14). The analysis applies standard point-source attenuation and considers distributed sources (crowd, band, speakers, parking, travel routes), providing a reasonable and conservative estimate of noise exposure at the nearest residences. The EIR concludes that, even with these conservative assumptions, operational stadium-event noise would remain significant and unavoidable—thus disclosing the worst-case scenario and meeting CEQA's disclosure requirements.

COMMENT LETTER I89. BARBARA SELEWICZ; SEPTEMBER 26, 2026

Response to Comment Letter I89. Barbara Selewicz

Comment I89-1 Response: The commenter's attendance at the District's June 23, 2026 (not 2027) Board Meeting is noted; that meeting was not a public a hearing on the Draft EIR. Responses to specific comments are provided in responses I89-2 through I89-4.

Comment I89-2 Response: Raider Stadium would only be used for events related to Rio Americano High School.

Comment I89-3 Response: Please see responses to comments O5-1 and O5-2.

Comment I89-4 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I90. BARBARA SELEWICZ; OCTOBER 15, 2026

Response to Comment Letter I90. Barbara Selewicz

Comment I90-1 Response: Responses to specific comments are provided in responses I90-2 through I90-12.

Comment I90-2 Response: Please see responses to comments O5-1 and O5-2.

Comment I90-3 Response: The commenter's opposition to the project is noted.

Comment I90-4 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I90-5 Response: The information requested by the commenter is contained in Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 and 4.3-26). The mitigation measures contained in the Draft EIR are specific, feasible, enforceable, and contain appropriate performance standards, and the Draft EIR appropriately analyzes the potential physical impacts of the proposed project. No changes to the Draft EIR are required.

Comment I90-6 Response: The commenter's statement that "prior to the Draft EIR we saw capacity continually shown as 2,575" is unclear. Draft EIR Chapter 3, "Project Description," correctly states that the proposed new bleachers could accommodate approximately 2,575 people (Draft EIR page 3-4). As discussed in Draft EIR Section 4.3, "Noise and Vibration," Section 4.4, "Transportation and Traffic," Draft EIR Appendix E (Local Transportation Analysis), and Draft EIR Appendix F (Vehicle Miles Traveled Analysis), 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 (Draft EIR page 4.4-1). Furthermore, as also discussed in these sections and appendices listed above, the projected attendance at Rio Americano High School graduation ceremonies is 3,400 people. Therefore, in order to be conservative, the Draft EIR analyzes both a "conservative scenario" (maximum attendance) and a "general event" (average attendance) scenario.

Comment I90-7 Response: Please see responses to comments O5-9 and I47-18, and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment I90-8 Response: The proposed project objectives are focused on serving Rio Americano High School. Education Code § 38131 establishes that every public school facility and grounds in California must have a "civic center" for community use, and it outlines the purposes for which school districts may grant access. Accordingly, San Juan Unified School District Board of Directors approved the District's Use of School Facilities Handbook (revised 2023), which outlines the process for community use of school facilities, which includes the existing Raider Stadium and that as it would exist with implementation of the proposed project, under a

structured permit, fee, and eligibility system that mirrors the statute's list of authorized purposes. While Rio Americano and other District campuses do not have a history of frequent community use, the Draft EIR uses reasonable and conservative assumptions for the analysis presented therein. For example, for the air quality analysis, the underlying vehicular activity assumes eight new home football games per year (the actual level of activity would be between five and eight games per year), four school assemblies, graduation and four new potential school-sanctioned community events, which were assumed to be peak-attendance events. Draft EIR Chapter 3, "Project Description," defines the proposed project components and the range of existing and future activities accommodated on-site (i.e., number of attendees that may attend various events) that would occur with implementation of the proposed project. The EIR appropriately evaluates multiple scenarios that represent the range of activities that would be accommodated by implementation of the proposed project. The Draft EIR provides a detailed accounting of the existing conditions, including their timing, the nature of the activities, the attendance levels, the existing use of lighting and the public address system, and other details, and compares the existing conditions to what would occur under the proposed project. Please see also Master Response 10: Accurate, Stable, and Finite Project Description. No changes to the Draft EIR are required.

Comment I90-9 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I90-10 Response: The traffic management plan suggested by the commenter is contained in Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (pages 4.4-15 and 4.4-16). No changes to the Draft EIR are required.

Comment I90-11 Response: The issues suggested by the commenter, if they were to occur, would be a law enforcement matter. No changes to the Draft EIR are required.

Comment I90-12 Response: The commenter's opposition to the project is noted. Please see also response to comment I90-1.

COMMENT LETTER I91. JOE SELEWICZ; OCTOBER 15, 2026

Response to Comment Letter I91. Joe Selewicz

Comment I91-1 Response: Responses to specific comments are provided in responses I91-2 through I92-26.

Comment I91-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I91-3 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I91-4 Response: Responses to individual comments submitted in this letter are contained in I91-2 through I92-26. Responses to the updated NOP comments referred to by the commenter are presented separately in responses I92-1 through I92-23.

Comment I91-5 Response: Please see response to comment I92-4.

Comment I91-6 Response: Draft EIR Table 3-1 in Chapter 3, "Project Description" (page 3-9) provides an accurate summary of the existing and anticipated uses of the stadium with implementation of the proposed project. For more on this, please see Master Response 10: Project Description. No changes to the Draft EIR are required.

Comment I91-7 Response: Please see response to comment I92-6.

Comment I91-8 Response: If the number of attendees were to exceed the amount of bleacher seating, as noted by the commenter, they would be required to stand along the stadium sidelines.

Comment I91-9 Response: Please see response to comment O5-9.

Comment I91-10 Response: Saturday uses of Raider Stadium are accounted for in Draft EIR Table 3-1. Please see also responses to comments I91-6 and O5-9.

Comment I91-11 Response: Please see responses to comments I91-6 and O5-9.

Comment I91-12 Response: Please see response to comment I92-6.

Comment I91-13 Response: The Draft EIR thoroughly evaluates all of the project's potential physical impacts on the environment, including the surrounding residences and the Parkway, and includes feasible mitigation measures (where necessary) to reduce the project's level of impacts. No changes to the Draft EIR are required.

Comment I91-14 Response: With regards to parking at Jesuit High School, please see response to comment I92-9 and Master Responses 6: Parking Availability and 9: Cumulative Impacts.

Comment I91-15 Response: Please see response to comment I92-9 and Master Response 6: Parking Availability. No changes to the Draft EIR are required.

Comment I91-16 Response: The situated suggested by the commenter, if it were to occur, would be a law enforcement matter. No changes to the Draft EIR are required.

Comment I91-17 Response: Please see response to comment I92-8.

Comment I91-18 Response: Please see response to comment I92-4 and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment I91-19 Response: Please see response to comment I92-22.

Comment I91-20 Response: The Draft EIR correctly states that the noise from the ongoing use of portable diesel-powered noise would cease once the proposed lighting is installed. Using battery-operated lights cannot be included in the EIR as a mitigation measure, as suggested by the commenter to reduce noise, because they would not accomplish the project's purpose and need; with battery-operated lights (instead of diesel-powered lights), the existing use of Raider Stadium would not be able to change from existing conditions. No changes to the Draft EIR are required.

Comment I91-21 Response: Please see response to comment O5-9 and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I91-22 Response: Please see response to comment I92-4.

Comment I91-23 Response: Please see responses to comments O5-1 and O5-2.

Comment I91-24 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I91-25 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I92. JOE AND BARBARA SELEWICZ; OCTOBER 15, 2026

Response to Comment Letter I92. Joe and Barbara Selewicz

Comment I92-1 Response: Responses to specific comments are provided in responses I92-2 through I92-23.

Comment I92-2 Response: Regarding preparation of a focused EIR, please see response to comment I82-2. The Draft EIR appropriately evaluates all potential physical impacts on the environment, in the appropriate geographic area. There is no reason to evaluate "impacts" on the south side of the American River because no impacts would occur in that geographic area, nor has the commenter provided evidence supporting this request. No changes to the Draft EIR are necessary.

Comment I92-3 Response: Please see response to comment I82-1.

Comment I92-4 Response: The information requested by the commenter is contained in Draft EIR Section 3.2.3, "Schedule of Uses," (Draft EIR pages 3-6 through 3-9). Raider Stadium will not be used for any events other than those associated with school uses, which are detailed in Table 3-1 (Draft EIR page 3-9). No changes to the Draft EIR are required.

Comment I92-5 Response: With regards to the times when lights will be used, please see response to comment I92-4. With regards to limits related to noise from public address speakers, please see Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 and 4.3-26). No changes to the Draft EIR are required.

Comment I92-6 Response: Raider Stadium will not be used for any events other than those associated with school uses, which are detailed in Table 3-1 (Draft EIR page 3-9). No changes to the Draft EIR are required.

Comment I92-7 Response: The Draft EIR contains an thorough analysis of light and glare impacts related to all geographic areas in Impact 4.1-2 (Draft EIR pages 4.1-18 through 4.1-26), and the Musco Lighting Report attached to the Draft EIR as Appendix B. Please see also response to comment I82-13. No changes to the Draft EIR are required.

Comment I92-8 Response: The Draft EIR contains a thorough and complete analysis of all potential impacts related to noise in Section 4.3, "Noise and Vibration." Please see Impact 4.3-1, under the heading "Crowd, Bleacher, Band, and Public Address System Noise" on Draft EIR pages 4.3-22 through 4.3-24. Draft EIR Mitigation Measure 4.3-1b (Draft EIR page 4.3-26) would require the District to implement controls related to the public address system, as suggested by the commenter, and this mitigation measure also includes measures to control bleacher noise, including the "foot stomping" referred to by the commenter. No changes to the Draft EIR are required.

Comment I92-9 Response: Draft EIR Section 4.4, "Transportation and Circulation," along with Draft EIR Appendix E (Local Transportation Analysis) both contain the information specifically requested by the commenter, including the number of off-street parking spaces, and exhibits showing the names and location of the streets where off-site parking could occur. As stated in Draft EIR Section 4.4, Rio Americano

and Jesuit High School already have a Memorandum of Understanding regarding shared parking during events, and Draft EIR Mitigation Measure 4.4-3a (page 4.4-15) would require the District to update this Memorandum as stated therein. Please see also Master Response 6: Parking Availability. Plans related to traffic flow, as suggested by the commenter, are required in Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (pages 4.4-15 and 4.4-16). No changes to the Draft EIR are required.

Comment I92-10 Response: A schedule of uses for Raider Stadium is provided and the amount of nighttime lighting is discussed in Draft EIR Section 3.2.3, "Schedule of Uses," (Draft EIR pages 3-6 through 3-9). No changes to the Draft EIR are required.

Comment I92-11 Response: Please see response to comment I92-6. No changes to the Draft EIR are required.

Comment I92-12 Response: As explained in Draft EIR Section 4.1, "Aesthetics," (page 4.1-15), the project site itself and the surrounding areas to the north, east, and west do not constitute scenic vistas. Views of the American River Parkway south of the project site are blocked by the elevated American River north bank flood control levee, and a line of tall trees along the school campus' southern property boundary. Thus, the Draft EIR appropriately concludes that the project would have no impact on a scenic vista. The information requested by the commenter regarding the press box is contained in Draft EIR Chapter 3, "Project Description," on Draft EIR page 3-4. No changes to the Draft EIR are required.

Comment I92-13 Response: As stated in Draft EIR Chapter 3, "Project Description," and Draft EIR Section 4.1, "Aesthetics," the existing baseline conditions related to the lighting properly include the portable diesel-powered lights at Raider Stadium which the District has been using in the past and continues to use now for limited nighttime sports events. The commenter is correct in stating that the Draft EIR does not limit lighting usage to non-daylight-savings-time months. No changes to the Draft EIR are required.

Comment I92-14 Response: The District appreciates the commenter's statement that the "current use / level of public address system seem minimal currently." The replacement public address system is necessary because the existing public address system is old. Please see the detailed analysis related to public address noise contained in Draft EIR Impact 4.3-1 (pages 4.3-22 through 4.3-24), and the public address sound levels would be limited as specified in Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 and 4.3-26). The Draft EIR correctly states that the noise from the ongoing use of portable diesel-powered noise would cease once the proposed lighting is installed. No changes to the Draft EIR are required.

Comment I92-15 Response: The purpose of the Draft EIR is not offer alternative travel incentives. The purpose of the Draft EIR is to install permanent high-mast lighting standards, along with additional new bleacher seating, a replacement public address system, and a new press box, along with safety lighting along the pedestrian travel path from the school campus parking to the lot to Raider Stadium (described in detail in Draft EIR Chapter 3, "Project Description"). No changes to the Draft EIR are required.

Comment I92-16 Response: Please see response to comment I109-34. No changes to the Draft EIR are required.

Comment I92-17 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I92-18 Response: The actions described by the commenter, if they were to occur, would be matters that should be reported to the police. No changes to the Draft EIR are required.

Comment I92-19 Response: See Master Response 9: Cumulative Impacts. In addition, the LTA evaluates the condition of both Rio Americano High School and Jesuit High School hosting concurrent typical events (note that, as explained in Master Response 9, Mitigation Measure 4.3-a requires coordination between the two schools such that each would not concurrently host peak attendance events). As described in the LTA, this concurrent scenario is less impactful than the maximum scenario as evaluated and presented in the Draft EIR.

Comment I92-20 Response: The commenter correctly states that no additional permanent restrooms at Raider Stadium would be provided. The Draft EIR concluded that the proposed project would not have significant impacts to utilities, including wastewater treatment. To the extent the commenter seeks construction of additional restrooms, this does not relate to an unmitigated or potentially significant environmental impact, but instead relates to a social impact, which need not be further considered under CEQA. This comment is noted.

Comment I92-21 Response: The commenter correctly states that the Draft EIR does not include relocation of existing tennis courts or the existing swimming pool on the Rio Americano High School campus. These changes suggested by the commenter, obtained from the "Rio campus vision plan dated June 2024," are not part of the proposed project. At the present time, the District has no plans to make additional improvements at the school campus. If and when the District were to decide to make any additional future improvements at Rio Americano High School, the District would prepare the appropriate environmental document as required by CEQA. For more on this, please see Master Response 9: Cumulative Impacts. No changes to the Draft EIR are required.

Comment I92-22 Response: All of the project components are described in detail in Draft EIR Chapter 3, "Project Description." The proposed project does not include any changes related to the existing scoreboard at Raider Stadium. For more on this, please see Master Response 10: Project Description.

Comment I92-23 Response: The commenter's preference for Alternative 1: No Project Alternative is noted. For further discussion on alternatives, please refer to Master Response 8: Alternatives.

COMMENT LETTER I93. SELGE; SEPTEMBER 27, 2026

Response to Comment Letter I93. Selge

Comment I93-1 Response: Draft EIR Section 4.1, "Aesthetics," evaluates potential nighttime lighting impacts and includes Mitigation Measure 4.1-2, which requires the proposed stadium lighting design to receive a "pass" rating from the International Dark Sky Association before construction to minimize light trespass, glare, and skyglow. After the Draft EIR was prepared, the District has since received the required "pass" rating for the proposed project's lighting design from the Dark Sky Association (attached to this FEIR as Appendix B). Draft EIR Section 4.3, "Noise and Vibration," includes Mitigation Measure 4.3-1b, which requires stadium event noise controls, including restrictions on amplified sound and event scheduling. However, operational stadium event noise would remain significant and unavoidable after implementation of feasible mitigation. Draft EIR Section 4.2, "Biological Resources," concludes that operational lighting and noise impacts on wildlife and habitat within the American River Parkway would be less than significant. Draft EIR Section 5.9, "Land Use and Planning," also evaluates the project's consistency with the American River Parkway Plan and Parkway Corridor Combining Zone and concludes that the project would not result in significant environmental impacts due to conflicts with applicable land use plans or policies. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife. No changes to the Draft EIR are required.

Comment I93-2 Response: Potential environmental impacts on the American River Parkway are evaluated in Draft EIR Sections 4.1, "Aesthetics," 4.2, "Biological Resources," Section 4.3, "Noise and Vibration," Section 5.9, "Land Use and Planning," and 5.13, "Recreation." The proposed improvements would occur within the existing Rio Americano High School campus and would not involve construction within the Parkway. The Draft EIR concludes that potential impacts on Parkway wildlife and habitat associated with operational nighttime lighting and noise would be less than significant. Potential effects on recreational facilities and their use are also evaluated and determined to be less than significant. No changes to the Draft EIR are required.

Comment I93-3 Response: Draft EIR Section 3.4, "Project Objectives," identifies objectives related to improving Raider Stadium facilities, expanding the school's capacity to host these activities, and increasing scheduling flexibility. Comprehensive redevelopment of the existing school buildings into multistory structures is not necessary to achieve these objectives. Draft EIR Chapter 6, "Alternatives," evaluates Alternative 2: Reconfigure Stadium and Athletic Fields, which would demolish and reconstruct Raider Stadium at the northeastern portion of the campus adjacent to American River Drive, approximately 875 feet from the American River Parkway. This alternative would also involve relocating existing athletic fields and a portion of the campus parking area. As discussed in Draft EIR Section 6.5, Alternative 2 would reduce the visibility of stadium lighting from the Parkway but would result in greater construction impacts and slightly greater operational noise impacts at surrounding residential receptors compared

to the proposed project. Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I93-4 Response: The commenter's opposition to the proposed project is noted.

COMMENT LETTER I94. FRANK SEVERSON; OCTOBER 2, 2026

Response to Comment Letter I94. Frank Severson

Comment I94-1 Response: Please see response to comment I1-1.

Comment I94-2 Response: Please see response to comment I1-2.

Comment I94-3 Response: Please see response to comment I1-3.

Comment I94-4 Response: Please see response to comment I1-4.

Comment I94-5 Response: Please see response to comment I1-5.

Comment I94-6 Response: Please see response to comment I1-6.

Comment I94-7 Response: Please see response to comment I1-7.

Comment I94-8 Response: Please see response to comment I1-8.

Comment I94-9 Response: Please see response to comment I1-9.

Comment I94-10 Response: Please see response to comment I1-10.

Comment I94-11 Response: Please see response to comment I1-11.

Comment I94-12 Response: Please see response to comment I1-12.

Comment I94-13 Response: Please see response to comment I1-13.

Comment I94-14 Response: Please see response to comment I1-14.

Comment I94-15 Response: Please see response to comment I1-15.

COMMENT LETTER I95. CHERYL SLAMA; OCTOBER 3, 2026

Response to Comment Letter I95. Cheryl Slama

Comment I95-1 Response: This comment letter (I95), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I95-2 through I95-17.

Comment I95-2 Response: Please see response to comment I1-4. The commenter's opposition to the proposed project is noted.

Comment I95-3 Response: Please see response to comment I1-1.

Comment I95-4 Response: Please see response to comment I1-2.

Comment I95-5 Response: Please see response to comment I1-3.

Comment I95-6 Response: Please see response to comment I1-4.

Comment I95-7 Response: Please see response to comment I1-5.

Comment I95-8 Response: Please see response to comment I1-6.

Comment I95-9 Response: Please see response to comment I1-7.

Comment I95-10 Response: Please see response to comment I1-8.

Comment I95-11 Response: Please see response to comment I1-9.

Comment I95-12 Response: Please see response to comment I1-10.

Comment I95-13 Response: Please see response to comment I1-11.

Comment I95-14 Response: Please see response to comment I1-12.

Comment I95-15 Response: Please see response to comment I1-13.

Comment I95-16 Response: Please see response to comment I1-14.

Comment I95-17 Response: Please see response to comment I1-15.

COMMENT LETTER I96. PAUL SPAULDING; OCTOBER 16, 2026

Response to Comment Letter I96. Paul Spaulding

Comment I96-1 Response: The commenter's clarification regarding the corrected attachment is acknowledged. The corrected comment letter has been included in the administrative record and is addressed in Responses to Comments I96-2 through I96-10. No further response is necessary.

Comment I96-2 Response: The commenter's concerns regarding the proposed project's consistency with American River Parkway Plan Policy 1.2, the American River Parkway Plan, Natural Resources Management Plan, and applicable state law are acknowledged. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for discussion of the proposed project's consistency with the American River Parkway Plan, the Natural Resources Management Plan, the Urban American River Parkway Preservation Act, and applicable land use requirements. Please also see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife regarding potential effects of increased stadium activity on Parkway resources.

Comment I96-3 Response: The commenter's concerns regarding daytime and nighttime stadium noise and potential effects on American River Parkway users are acknowledged. The statement on Draft EIR page 5.13-33 that the project would have no impact on recreationists within the Parkway is made in the context of nighttime lighting, recreational access, and potential conflicts associated with event-related parking and traffic. Although stadium activities would occur during both daytime and evening hours, potential operational noise impacts are evaluated separately in Draft EIR Section 4.3, “Noise and Vibration,” including noise associated with crowds, band activity, and amplified sound. The Draft EIR identifies significant and unavoidable operational noise impacts after mitigation. Please see Master Response 7: Operations Management, Including Traffic Management and Emergency Evacuation for discussion of applicable stadium event noise controls.

Comment I96-4 Response: The commenter’s concerns regarding daytime and nighttime stadium activities, event frequency, operating hours, and amplified sound are acknowledged. Draft EIR Sections 3.2.2 and 3.2.3 describe the anticipated stadium operations, including event types, frequency, duration, and attendance. Section 3.2.2 also identifies Night Event Management Standards that would be implemented in conjunction with existing school policies and procedures. As discussed in Response to Comment O4-11, community use of school facilities remains subject to the District’s Use of School Facilities Handbook, and the proposed project does not authorize unrestricted use of the stadium for the additional event types. The Draft EIR Mitigation Measure 4.3-1b establishes operational noise controls, including public address system noise limits and restrictions on amplified sound and band activity after 10:00 p.m. Although the Draft EIR does not establish numerical limits on all future events, its environmental analyses are based on the anticipated stadium operations described in Chapter 3. The Draft EIR evaluates potential noise impacts associated with daytime and nighttime stadium activities and identifies significant and unavoidable operational noise impacts after mitigation. Please see Master Response 7: Operations Management, Including Traffic Management and

Emergency Evacuation and Master Response 10: Accurate, Stable, and Finite Project Description for additional discussion.

Comment I96-5 Response: The commenter's concerns regarding potential impacts of stadium noise and vibration on wildlife habitat connectivity and movement corridors within the American River Parkway are acknowledged. Draft EIR Section 4.2, "Biological Resources," evaluates potential impacts on Parkway wildlife associated with increased stadium noise, including potential effects on wildlife behavior and movement. The analysis considers the anticipated noise levels, frequency, and duration of stadium events and concludes that operational noise impacts on wildlife would be less than significant. The proposed project would not introduce physical barriers to wildlife movement or permanently alter habitat connectivity. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for discussion of applicable American River Parkway Plan policies, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for further discussion of potential effects on Parkway wildlife.

Comment I96-6 Response The commenter's concerns regarding increased stadium capacity and event activity adjacent to a Protected Area of the American River Parkway are acknowledged. American River Parkway Plan Policy 7.12 addresses the location of activities and facilities that attract large numbers of users within the Parkway. The proposed project would improve existing athletic facilities on the Rio Americano High School campus and would not introduce new facilities or activities within the Parkway. The Draft EIR evaluates potential indirect effects of increased stadium use on adjacent Parkway resources, including noise, lighting, and biological resources. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for further discussion of the project's consistency with the American River Parkway Plan.

Comment I96-7 Response: The commenter's concerns regarding increased stadium noise and potential impacts on wildlife within the American River Parkway are acknowledged. Draft EIR Section 4.2, "Biological Resources," evaluates potential effects of operational noise on Parkway wildlife, including noise extending beyond the project boundary. The analysis considers the anticipated noise levels, frequency, and duration of stadium events and concludes that operational noise impacts on wildlife would be less than significant. Separately, Draft EIR Section 4.3, "Noise and Vibration," identifies significant and unavoidable operational noise impacts on nearby noise-sensitive human receptors after mitigation. Therefore, the Draft EIR adequately addresses the potential noise impacts identified by the commenter, including effects beyond the project boundary. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for discussion of American River Parkway Plan Policies 7.19 and 7.19.1, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional discussion.

Comment I96-8 Response: The commenter's concerns regarding increased stadium capacity and event activity adjacent to the Rio Americano wetland and lagoon area are acknowledged. American River Parkway Plan Policy 10.28 calls for the wetland and lagoon area to remain undeveloped and protected. The proposed project would involve improvements to existing athletic facilities within the Rio

Americano High School campus and would not involve development within the wetland or lagoon area. Draft EIR Section 4.2, "Biological Resources," evaluates potential indirect effects of stadium operations on adjacent Parkway habitat, including noise and nighttime lighting, and concludes that operational impacts on biological resources would be less than significant. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional discussion.

Comment I96-9 Response: The commenter requests a baseline ambient nighttime lighting survey of the American River Parkway, citing Goal 4.5 and Objective 4.5a of the American River Parkway Natural Resources Management Plan. These provisions address the management of ambient lighting within the Parkway. Draft EIR Sections 4.1, "Aesthetics," and 4.2, "Biological Resources," evaluate potential impacts of the proposed stadium lighting on adjacent Parkway resources using project-specific photometric modeling, including light trespass, glare, skyglow, and potential effects on wildlife. The analysis concludes that operational lighting impacts on biological resources would be less than significant. Therefore, a separate baseline ambient nighttime lighting survey was not identified as necessary to evaluate the project's environmental impacts. Please see Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife and Master Response 3: Nighttime Light and Glare Impacts on Surrounding Neighbors for additional discussion.

Comment I96-10 Response: The concerns regarding the District's authority and objectivity in reviewing and approving the EIR are acknowledged. Under CEQA Guidelines Sections 15050 and 15051, the lead agency is the public agency with principal responsibility for carrying out or approving a project. As the agency proposing the stadium improvements on its existing school campus, San Juan Unified School District is the appropriate lead agency responsible for preparing and considering the EIR and determining whether to approve the proposed project. The project's proximity to the American River Parkway does not transfer lead agency responsibility to the California Natural Resources Agency or Sacramento County Regional Parks. Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for additional discussion of the District's authority and the applicability of Parkway-related regulations.

COMMENT LETTER I97. MARY STARKEY; OCTOBER 14, 2026

Response to Comment Letter I97. Mary Starkey

Comment I97-1 Response: Please see response to comment I1-1.

Comment I97-2 Response: Please see response to comment I1-2.

Comment I97-3 Response: Please see response to comment I1-3.

Comment I97-4 Response: Please see response to comment I1-4.

Comment I97-5 Response: Please see response to comment I1-5.

Comment I97-6 Response: Please see response to comment I1-6.

Comment I97-7 Response: Please see response to comment I1-7.

Comment I97-8 Response: Please see response to comment I1-8.

Comment I97-9 Response: Please see response to comment I1-9.

Comment I97-10 Response: Please see response to comment I1-10.

Comment I97-11 Response: Please see response to comment I1-11.

Comment I97-12 Response: Please see response to comment I1-12.

Comment I97-13 Response: Please see response to comment I1-13.

Comment I97-14 Response: Please see response to comment I1-14.

Comment I97-15 Response: Please see response to comment I1-15.

COMMENT LETTER I98. SARA STEPHENS; OCTOBER 15, 2026

Response to Comment Letter I98. Sara Stephens

Comment I98-1 Response: This comment letter (I98), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I98-2 through I98-17.

Comment I98-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I98-3 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I98-4 Response: Please see responses to comments I1-1 and I1-2.

Comment I98-5 Response: Please see response to comment I1-3.

Comment I98-6 Response: Please see response to comment I1-4.

Comment I98-7 Response: Please see response to comment I1-5.

Comment I98-8 Response: Responses to specific concerns raised by the commenter, as referenced in this comment, are provided in I98-9 through I98-16.

Comment I98-9 Response: Please see responses to comments I1-6 and I1-7.

Comment I98-10 Response: Please see response to comment I1-8.

Comment I98-11 Response: Please see response to comment I1-9.

Comment I98-12 Response: Please see responses to comments I1-10 and I1-11.

Comment I98-13 Response: Please see response to comment I1-12.

Comment I98-14 Response: Please see response to comment I1-13.

Comment I98-15 Response: Please see response to comment I1-14.

Comment I98-16 Response: Please see response to comment I1-15.

Comment I98-17 Response: The Draft EIR contains a thorough and complete analysis of the project's potential physical impacts on the environment. No changes to the Draft EIR are required.

COMMENT LETTER I99. DR. MICHELLE STEVENS; OCTOBER 16, 2026

Response to Comment Letter I99. Dr. Michelle Stevens

Comment I99-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I99-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I99-3 Response: The recommended mitigation is not applicable to the proposed project. No ground disturbance or vegetation removal is proposed in suitable upland habitat for northwestern pond turtle. All ground disturbance associated with the proposed project would occur on the school campus. As stated in the Draft EIR (p. 4.2-9), undeveloped areas on the school campus are densely vegetated with regularly maintained turfgrass and unsuitable for nesting turtles. Furthermore, the school campus is surrounded by 3-foot-high chain link fencing, and Mitigation Measure 4.2-1d (p. 4.2-22) includes measures to repair the fence, where necessary, to exclude turtles from the project site during construction. No changes to the EIR are required.

Comment I99-4 Response: Operational impacts of new stadium events on wildlife and habitat are analyzed in the Draft EIR under Impact 4.2-1 (pages 4.2-17 through 4.2-24), Impacts 4.2-2 and 4.2-3 (page 4.2-24), Impact 4.2-4 (pages 4.2-24 and 4.2-25), Impact 4.2-5 (pages 4.2-25 and 4.2-26), and Impact 4.2-6 (pages 4.2-26 and 4.2-27). Operational impacts of the proposed project on recreation are analyzed in the Draft EIR under Impact 5.13-1 (page 5.13-33) and Impact 5.13-2 (pages 5.13-33 through 5.13-34) in the Draft EIR.

See response to comment I99-3 above regarding the potential for northwestern pond turtle nesting on the Rio Americano Campus. As stated in the Draft EIR (p. 4.2-9), the habitat suitability and fencing surrounding the campus, rather than the proximity to aquatic habitat, limit potential nesting.

Comment I99-5 Response: Please see response to comment I1-14.

Comment I99-6 Response: Please see response to comment I1-15.

COMMENT LETTER I100. DON STEWART; OCTOBER 14, 2026

Response to Comment Letter I100. Don Stewart

Comment I100-1 Response: Please see response to comment I1-1.

Comment I100-2 Response: Please see response to comment I1-2.

Comment I100-3 Response: Please see response to comment I1-3.

Comment I100-3 Response: Please see response to comment I1-4.

Comment I100-5 Response: Please see response to comment I1-5.

Comment I100-6 Response: Please see response to comment I1-6.

Comment I100-7 Response: Please see response to comment I1-7.

Comment I100-8 Response: Please see response to comment I1-8.

Comment I100-9 Response: Please see response to comment I1-9.

Comment I100-10 Response: Please see response to comment I1-10.

Comment I100-11 Response: Please see response to comment I1-11.

Comment I100-12 Response: Please see response to comment I1-12.

Comment I100-13 Response: Please see response to comment I1-13.

Comment I100-14 Response: Please see response to comment I1-14.

Comment I100-15 Response: Please see response to comment I1-15.

Comment I100-16 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

COMMENT LETTER I101. SARAH STRAND; OCTOBER 14, 2026

Response to Comment Letter I101. Sarah Strand

Comment I101-1 Response: Please see response to comment I1-1.

Comment I101-2 Response: Please see response to comment I1-2.

Comment I101-3 Response: Please see response to comment I1-3.

Comment I101-4 Response: Please see response to comment I1-4.

Comment I101-5 Response: Please see response to comment I1-5.

Comment I101-6 Response: Please see response to comment I1-6.

Comment I101-7 Response: Please see response to comment I1-7.

Comment I101-8 Response: Please see response to comment I1-8.

Comment I101-9 Response: Please see response to comment I1-9.

Comment I101-10 Response: Please see response to comment I1-10.

Comment I101-11 Response: Please see response to comment I1-11.

Comment I101-12 Response: Please see response to comment I1-12.

Comment I101-13 Response: Please see response to comment I1-13.

Comment I101-14 Response: Please see response to comment I1-14.

Comment I101-15 Response: Please see response to comment I1-15.

COMMENT LETTER I102. DALE VAIRA; OCTOBER 13, 2026

Response to Comment Letter I102. Dale Vaira

Comment I102-1 Response: This comment letter (I102), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I102-2 through I102-5; as explained therein, there are no deficiencies in the Draft EIR that require correction.

Comment I102-2 Response: The commenter's opinion that off-street parking around the school, as identified in Draft EIR Appendix E and Section 4.4, "Transportation and Traffic," is "unreasonable and could not ever be achieved" is noted. The information requested by the commenter related to off-site parking and traffic, and pedestrian and bicycle safety, is contained in Draft EIR Section 4.4. Please see Impact 4.4-1 (pages 4.4-8 and 4.4-9), Impact 4.4-3 (pages 4.4-11 through 4.4-14), and Mitigation Measures 4.4-3a, 4.4-3b, and 4.4-3c (pages 4.4-15 and 4.4-16). Please see also Master Response 6: Parking Availability and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I102-3 Response: The times when the proposed lighting would be used at Raider Stadium are described in Draft EIR Chapter 3, "Project Description," on page 3-7. No changes to the Draft EIR are required.

Comment I102-4 Response: Please see responses to comments O5-1 and O5-8. No changes to the Draft EIR are required.

Comment I102-5 Response: There are no "government hieght regulations" with which the proposed project is required to comply, nor has the commenter provided any specifics as to how he believes the Draft EIR is deficient. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

COMMENT LETTER I103. DALE VAIRA; OCTOBER 14, 2026

Response to Comment Letter I103. Dale Vaira

Comment I103-1 Response: This comment letter (I103), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I103-2 and I103-3; as explained therein, there are no deficiencies in the Draft EIR that require correction.

Comment I103-2 Response: With regards to emergency evacuation, please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. The security plan suggested by the commenter is not required. The project site is situated on the Rio Americano High School campus and attendees at sports events are expected to stay on the high school campus, which is fenced; trespassing on the Parkway after dark would be a law enforcement matter. No changes to the Draft EIR are required.

Comment I103-3 Response: Draft EIR Table 3-1 (page 3-9) provides the maximum expected attendance levels at graduation ceremonies that would be held at Raider Stadium. A separate "seating plan" as suggested by the commenter is not related to the project's potential physical impacts on the environment, and therefore is not required. With regards to parking, please see Draft EIR Section 4.4, "Transportation and Circulation"; Draft EIR Appendix E, "Local Transportation Analysis"; and Master Response 6: Parking Availability. No changes to the Draft EIR are required.

COMMENT LETTER I104. DALE VAIRA; OCTOBER 15, 2026

Response to Comment Letter I104. Dale Vaira

Comment I104-1 Response: This comment letter (I104), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I104-2; as explained therein, there are no deficiencies in the Draft EIR that require correction.

Comment I104-2 Response: All of the proposed project components are thoroughly described in Draft EIR Chapter 3, "Project Description." The proposed project does not include removal of any trees. No changes to the Draft EIR are required.

COMMENT LETTER I105. DARLENE VAIRA; OCTOBER 15, 2026

Response to Comment Letter I105. Darlene Vaira

Comment I105-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I105-2 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I105-3 Response: The analyses requested by the commenter are contained in Draft EIR Section 4.4, "Transportation and Circulation," and Draft EIR Appendix E, "Local Transportation Analysis." Please see also Master Response 6: Parking Availability. No changes to the Draft EIR are required.

Comment I105-4 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I105-5 Response: Most of this comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted. Please see also Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation.

Comment I105-6 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I105-7 Response: Please see responses to comments I105-1 through I105-6, above. No changes to the Draft EIR are required.

Comment I105-8 Response: Please see response to comment I82-2. No changes to the Draft EIR are required.

Comment I105-9 Response: This comment letter (I105), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I105-1 through I105-8.

COMMENT LETTER I106. DARLENE VAIRA; OCTOBER 15, 2026

Response to Comment Letter I106. Darlene Vaira

Comment I106-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I106-2 Response: If any of the issues raised by the commenter were to occur, they would be a law enforcement matter. No changes to the Draft EIR are required.

Comment I106-3 Response: Please see response to comment I106-2. No changes to the Draft EIR are required.

Comment I106-4 Response: Please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I106-5 Response: Please see response to comment I82-2. No changes to the Draft EIR are required.

Comment I106-6 Response: This comment letter (I106), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I106-1 through I106-5.

COMMENT LETTER I107. DARLENE VAIRA; OCTOBER 15, 2026

Response to Comment Letter I107. Darlene Vaira

Comment I107-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I107-2 Response: Please see response to comment O5-1. No changes to the Draft EIR are required.

Comment I107-3 Response: Draft EIR Section 5.13, "Recreation," correctly states that since the Parkway is closed to public use after sundown there would be no recreationists in the Parkway when the proposed lights at Raider Stadium would be use, and thus there would be no impact (pages 5.13-33 and 5.13-34). With regards to potential lighting issues experienced by nearby residences, as stated on Draft EIR page 4.1-22, 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* (2004) 119 Cal.App.4th 477, 492-494). Nevertheless, for purposes of full disclosure, the District has elected to provide a comparison of nighttime lighting changes from the surrounding private residences." This analysis is presented on Draft EIR pages 4.1-22 through 4.1-26.

Draft EIR Section 4.2, "Biological Resources," contains a thorough and complete analysis of the project's potential construction and operational lighting impacts on wildlife within the Parkway in Impact 4.2-1, pages 4.2-15 through 4.2-24.

The anticipated times when lighting would be used at Raider Stadium are provided in Draft EIR Chapter 3, "Project Description," (page 3-7). Preventing "unnecessary lighting" (i.e., light spillover) as suggested by the commenter is incorporated into the project's lighting design as demonstrated in the Musco Lighting Report attached to the Draft EIR as Appendix B, and summarized in Draft EIR Impact 4.1-2 (pages 4.1-18 through 4.1-26).

An alternative that would involve less intrusive lighting is analyzed in the Draft EIR—this is Alternative 1: No Project Alternative, which includes use of the existing portable diesel-powered lights (Draft EIR pages 6-4 and 6-5). Please see also Master Response 8: Alternatives. No changes to the Draft EIR are required.

Comment I107-4 Response: The noise controls suggested by the commenter are included in Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 through 4.3-26). No changes to the Draft EIR are required.

Comment I107-5 Response: The Draft EIR contains a thorough and complete analysis of the project's potential noise impacts on wildlife within the Parkway in Impact 4.2-1 (pages 4.2-20 and 4.2-21). Draft EIR Section 5.13, "Recreation," correctly states that since the Parkway is closed to public use after sundown there would be no recreationists in the Parkway when the proposed lights at Raider Stadium would be in use, and thus there would be no impact (pages 5.13-33 and 5.13-34). Noise controls are included in Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 through 4.3-26). Please see also Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I107-6 Response: The cumulative noise analysis requested by the commenter is presented in Draft EIR Section 7.1, "Cumulative Impacts," on page 7-10. No changes to the Draft EIR are required.

Comment I107-7 Response: With regards to noise impacts on wildlife from the proposed Raider Stadium improvements, please see response to comment I107-3. Please see also response to comment O5-1. No changes to the Draft EIR are required.

Comment I107-8 Response: Acoustic measurements were conducted at representative locations in the Parkway and local residences as requested by the commenter, and are included in the noise analyses contained in Draft EIR Section 4.2, "Biological Resources," and Section 4.3, "Noise and Vibration." No changes to the Draft EIR are required.

Comment I107-9 Response: The noise controls suggested by the commenter are included in Draft EIR Mitigation Measure 4.3-1b (pages 4.3-25 through 4.3-26). It is unclear why the commenter is requesting noise controls for the games currently held at El Camino High School under existing conditions, which is 3 miles from the commenter's residence and is not the subject of the proposed project. No changes to the Draft EIR are required.

Comment I107-10 Response: The information requested by the commenter is contained in Draft EIR Section 4.3, "Noise and Vibration," and Section 4.4, "Transportation and Circulation." With regards to event operations, please see Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I107-11 Response: The analysis requested by the commenter is contained in Draft EIR Section 4.2, "Biological Resources." No changes to the Draft EIR are required.

Comment I107-12 Response: Please see response to comment I107-4. No changes to the Draft EIR are required.

Comment I107-13 Response: Please see response to comment I107-4. No changes to the Draft EIR are required.

Comment I107-14 Response: Please see response to comment I107-4. No changes to the Draft EIR are required.

Comment I107-15 Response: For the reasons explained in responses to comments I107-1 through I107-14, no additional analysis is required. With regards to the use of a Focused EIR, please see response to comment I82-2. The analysis contained in the Draft EIR is sufficient to adequately and accurately inform decisionmakers and the public with regards to the project's potential physical impacts on the environment. No changes to the Draft EIR are required.

Comment I107-16 Response: This comment letter (I107), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I107-1 through I107-15.

COMMENT LETTER I108. DARLENE VAIRA; OCTOBER 15, 2026

Response to Comment Letter I108. Darlene Vaira

Comment I108-1 Response: The commenter has provided no evidence, such as photographs, showing that under existing conditions, "…our side streets around Rio's Campus have become heavily impacted with cars all day, 5 days a week, where we can't park in front of our own homes" as claimed by the commenter. The parking demand analysis requested by the commenter is contained in Draft EIR Appendix E, "Local Transportation Analysis." Locations of additional off-campus parking are identified in Draft EIR Appendix E and Draft EIR Exhibit 4.4-2 (page 4.4-5) and are discussed in detail in Draft EIR Section 4.3, "Transportation and Circulation," including pages 4.4-4 through 4.4-6, and 4.4-12 through 4.4-14. Mitigation Measures related to parking and event management are presented on Draft EIR pages 4.4-15 and 4.4-16. Please see also Master Response 6: Parking Availability.

Comment I108-2 Response: Please see response to comment I108-1 and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I108-3 Response: Please see response to comment I108-1 and Master Response 7: Operations Management, including Traffic Management and Emergency Evacuation. No changes to the Draft EIR are required.

Comment I108-4 Response: This comment letter (I108), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I108-1 through I108-3.

COMMENT LETTER I109. PHILIP VERCRUYSSEN; OCTOBER 15, 2026

Response to Comment Letter I109. Philip Vercruyssen

Comment I109-1 Response: This comment letter (I109), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record.

Comment I109-2 Response: The commenter's background information is noted. Responses to individual comments provided by the commenter are contained in I109-3 through I109-44.

Comment I109-3 Response: Please see response to comment I82-1. No changes to the Draft EIR are required.

Comment I109-4 Response: The information requested by the commenter is contained in Draft EIR Section 3.2, "Proposed Project Characteristics" (pages 3-4 through 3-9).

Comment I109-5 Response: The commenter's support for the No Project Alternative is noted.

Comment I109-6 Response: The commenter quotes from the Draft EIR Executive Summary, Table 1-1 (Summary of Impacts and Mitigation Measures), specifically from text contained in Draft EIR Mitigation Measure 4.1-2, which requires the District to obtain a "pass" rating from the Dark Sky Association prior to the start of construction activities. The lighting system for the proposed project has been designed to meet Dark Sky certification, as detailed in the Musco Lighting Report attached as Draft EIR Appendix B, and discussed in Draft EIR Impact 4.1-2. If for some reason, the Dark Sky Association were to determine that the system as designed does not meet their criteria, Mitigation Measure 4.1-2 appropriately states that the system would be redesigned as necessary. Furthermore, the required "pass" rating has since been received from the Dark Sky Association and is attached to this FEIR as Appendix B. No changes to the Draft EIR are required.

Comment I109-7 Response: The commenter quotes from the Draft EIR Executive Summary, Table 1-1 (Summary of Impacts and Mitigation Measures), specifically page 1-8, referencing a portion of Draft EIR Mitigation Measure 4.2-1e: Nesting Bird Protections. The provisions contained in Mitigation Measure 4.2-1e would be implemented by a qualified biologist, as stated therein. Please see also the detailed analysis contained in Draft EIR Impact 4.2-1 (pages 4.2-15 through 4.2-24).

Comment I109-8 Response: The commenter quotes from the Draft EIR Executive Summary, Table 1-1 (Summary of Impacts and Mitigation Measures), specifically page 1-11, referencing a portion of Draft EIR Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls. The term referenced by the commenter, "minimize spillover," is self evident. The automatic shut-off suggested by the commenter is unnecessary since Mitigation Measure 4.3-1 (page 1-11) referenced by the commenter requires volume-limiting controls to establish a maximum output level that cannot be exceeded by event staff. An "enforcement mechanism," as requested by the commenter, is not necessary for the same reason. No changes to the Draft EIR are required.

Comment I109-9 Response: The commenter quotes from the Draft EIR Executive Summary, Table 1-1 (Summary of Impacts and Mitigation Measures), specifically page 1-12, referencing a portion of Draft EIR Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls, specifically "Event Scheduling and Use Restrictions." The information requested by the commenter is stated on page 1-12, in the first bullet point under the heading "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." No changes to the Draft EIR are required.

Comment I109-10 Response: The commenter quotes from the Draft EIR Executive Summary, Table 1-1 (Summary of Impacts and Mitigation Measures), specifically page 1-13, referencing a portion of Draft EIR Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls, specifically "Bleacher and Ramp Noise Controls." The sound dampening for bleacher noise requested by the commenter is stated in the first bullet point under the heading "Bleacher and Ramp Noise Controls." No changes to the Draft EIR are required.

Comment I109-11 Response: The commenter quotes from the Draft EIR Executive Summary, Table 1-1 (Summary of Impacts and Mitigation Measures), specifically pages 4 1-14 and 1-15, referencing a portion of Draft EIR Mitigation Measure 4.4-3b: Implement an Event Transportation Plan. Executive Summary Table 1-1 presents a list of the mitigation measures contained in the Draft EIR. Please see Draft EIR Section 4.4, "Traffic and Circulation," and Draft EIR Appendices E and F, for the underlying analyses. No changes to the Draft EIR are required.

Comment I109-12 Response: The Draft EIR comprehensively addresses the potential increase in sports events that would be held at Raider Stadium, through all of the topic areas in Chapter 4, "Environmental Impact Analysis," and Chapter 5, "Effects Found to be Less Than Significant." The cumulative analysis requested by the commenter related to the El Camino Fundamental High School is contained in Draft EIR Section 7.1, "Cumulative Impacts." No changes to the Draft EIR are required.

Comment I109-13 Response: Please See Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I109-14 Response: The use of portable diesel-powered lights at Raider Stadium is an existing condition. The District provided notice to surrounding residents via a letter dated October 24, 2022. The commenter's request that the District switch to battery-operated lights instead of diesel-powered lights is noted.

Comment I109-15 Response: With regards to the applicability of the American River Parkway Plan and the Urban American River Parkway Preservation Act, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I109-16 Response: The statement referenced by the commenter on Draft EIR page 4.1-17 is correct: "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." Please see also Photo Viewpoint KOP-7, on Draft EIR page 4.1-8. No changes to the Draft EIR are required.

Comment I109-17 Response: The commenter's opinions that the proposed sports events at Raider Stadium where nighttime lighting could be used would be "exorbitant" and that the light fixtures would be "massive" are noted. The details requested by the commenter related to the proposed lighting system are contained in Draft EIR Section 3.2, "Proposed Project Characteristics" (pages 3-4 through 3-9). No changes to the Draft EIR are required.

Comment I109-18 Response: The Musco Lighting Report attached as Draft EIR Appendix B appropriately performed a nighttime light and glare analysis. The results of the lighting analysis along the school campus' northeastern property boundary, which abuts residences along the southwest side of Whitehall Way, are shown on pages 11 through 20 of the Musco Lighting Report. The results of the Musco Lighting Report are discussed in Draft EIR Impact 4.1-2 (pages 4.1-18 through 4.1-26). Visual simulations from residences along Whitehall Way are presented on Draft EIR page 4.1-23. No changes to the Draft EIR are required.

Comment I109-19 Response: The District received the NOP comment letter from the Sacramento County Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the County Parks letter is provided in Draft EIR Appendix A. With regards to the applicability of the American River Parkway Plan and the Urban American River Parkway Preservation Act, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I109-20 Response: Please see response to comment I109-19, above.

Comment I109-21 Response: For the reasons explained in detail in Impact 4.2-1, the Draft EIR properly determined that operational noise impacts on wildlife would be less than significant (pages 4.2-20 and 4.2-21). As stated on Draft EIR page 4.2-20, the noise analysis related to wildlife incorporates the high noise levels that could occur with higher attendance sports events, as suggested by the commenter. No changes to the Draft EIR are required.

Comment I109-22 Response: The commenter's assertion that the project's noise impacts on wildlife were found to be less-than-significant solely because events would be infrequent is incorrect. Please see the detailed analysis presented on Draft EIR pages 4.2-20 and 4.2-21. No changes to the Draft EIR are required.

Comment I109-23 Response: Please see response to comment I109-19, above.

Comment I109-24 Response: For the reasons explained in responses to comments I109-3 through I109-23, no changes to the Draft EIR are necessary and recirculation is not required.

Comment I109-25 Response: With regards to compliance with the Sacramento County Noise Ordinance, please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I109-26 Response: The Draft EIR evaluates the potential noise increase in relationship to the Parkway. Please see response to comment I109-21, above.

Comment I109-27 Response: The Draft EIR comprehensively evaluates the potential for traffic increases in Section 4.4, "Transportation and Circulation," and Draft EIR Appendices E and F. With regards to the commenter's request for a "TMP," which the District assumes refers to a traffic management plan, please see Mitigation Measures 4.4-3b and 4.4-3c (Draft EIR pages 4.4-15 and 4.4-16). No changes to the Draft EIR are required.

Comment I109-28 Response: Please See Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I109-29 Response: Please see responses to comments I109-8 and I109-9, above. No changes to the Draft EIR are required.

Comment I109-30 Response: The commenter's preference for the No Project Alternative is noted.

Comment I109-31 Response: While there may be existing parking and congestion concerns on Whitehall Way, the transportation analysis focuses on locations where the project can reasonably cause a potentially significant change in traffic operations, safety, or parking, based on CEQA standards and local guidance. The Draft EIR's LTA centers on the primary access corridors and intersections that carry event traffic, particularly American River Drive and campus access points. Whitehall Way is not identified as a primary access route or study intersection in the LTA and does not modify Whitehall Way or direct event traffic to it, there is no pathway by which the project would materially affect operations on that street under CEQA's "substantial evidence" standard. No additional analysis or revisions to the Draft EIR are required.

Comment I109-32 Response: Regarding the commenter's note that mitigation measures need to use the terms "shall" and "must," the applicable mitigation measures of the Draft EIR have been revised to use this terminology, rather than using the term "should." These edits are provided in Chapter 3, "Errata," of this Final EIR. The actions suggested by the commenter for the Night Event Management Standards are included in Draft EIR Mitigation Measures 4.4-3b and 4.4-3c (pages 4.4-15 and 4.4-16).

Comment I109-33 Response: The commenter's disagreement with the less-than-significant impact conclusion for Draft EIR Impact 5.9-2 (pages 5.9-29 and 5.9-30), related to conflicts with the Parkway Plan and the Urban American River Parkway Preservation Act, is noted. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use. No changes to the Draft EIR are required.

Comment I109-34 Response: The commenter's disagreement with the less-than-significant impact conclusion for Draft EIR Impact 5.12-1 (page 5.12-32), related to substantial adverse physical impacts associated with the provision of new or physically altered police facilities, or the need for new or physically altered police 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, is noted. As stated on Draft EIR page 5.12-32, 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, the Draft EIR correctly concludes there would be no impact. No changes to the Draft EIR are required.

Comment I109-35 Response: The commenter suggests that the Draft EIR's analysis of recreation impacts (Impact 5.13-1 on page 5.13-33) should be revised because, in the commenter's opinion, putting the stadium in a place that is subject to fire and flood risks would result in costly maintenance. Raider Stadium is an existing stadium on the existing Rio Americano High School Campus. The potential for fire hazards is evaluated in Draft EIR Impact 5.7-6 (page 5.7-25) and as explained therein, the project site and the school campus are not located within or near any type of classified fire hazard zone. As discussed in Draft EIR Impact 5.8-3(iv) (pages 5.8-28 and 5.8-29), the project site is not located in a 100-year flood zone. The Rio Americano High School Campus, including Raider Stadium, is protected from flooding by the American River north bank levee, which is part of the State Plan of Flood Control. Regardless, fire and flood hazards are not related to the analysis of recreation contained in Draft EIR Section 5.13, "Recreation." No changes to the Draft EIR are required.

Comment I109-36 Response: The text referred to by the commenter, which is contained in the first sentence of Draft EIR Impact 5.13-2 (page 5.13-33) is correct: "The proposed project does not include new recreational facilities but would improve recreational facilities at the existing Raider Stadium." Please see Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I109-37 Response: The District has not identified the need for any new restrooms as part of the proposed project. No changes to the Draft EIR are required.

Comment I109-38 Response: As explained in Draft EIR Section 6.3.2 (page 6-4), 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, the Rescheduling To Morning Hours alternative described on Draft EIR page 6-4 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, an alternative that would involve rescheduling sports events to morning hours was appropriately determined to be infeasible (Draft EIR page 6-4).

Comment I109-39 Response: With regards to the current, existing use of diesel-powered lights, please see response to comment I109-14, above. No changes to the Draft EIR are required.

Comment I109-40 Response: The meaning of the commenter's statement of disagreement with the "Draft EIR conclusions throughout this section asserting 1) no need for cumulative analysis" is unclear. The Draft EIR does not say there is no need for cumulative analyses; in fact, detailed cumulative analyses are presented in Draft EIR Section 7.1, "Cumulative Impacts," on pages 7-2 through 7-13. The commenter's disagreement with the cumulative impact conclusions contained in the Draft EIR is noted.

Comment I109-41 Response: The commenter references the cumulative impact analysis related to traffic presented on Draft EIR page 7-13. The traffic studies performed for the project (attached to the Draft EIR in Appendices E and F) are adequate and complete. Draft EIR Section 4.4, "Transportation and Circulation," includes feasible mitigation measures that would reduce the project's potentially significant impacts, as well as the project's cumulative traffic impacts, to a less-than-significant level. No changes to the Draft EIR are required.

Comment I109-42 Response: Please see responses to comments I109-15 and I109-41 above. No changes to the Draft EIR are required.

Comment I109-43 Response: The comment restates the reasons why the project's noise construction and operational noise impacts would remain significant and unavoidable after implementation of mitigation (page 4.3-27). The comment is noted.

Comment I109-44 Response: The commenter's opposition to the project is noted. Responses to individual comments are provided in I109-1 through I109-43. The District received the NOP comment letter from the Sacramento County Parks Department and considered the comments therein during preparation of the Draft EIR; a copy of the County Parks letter is provided in Draft EIR Appendix A.

COMMENT LETTER I110. GINNY VOLK-ANDERSON; OCTOBER 15, 2026

Response to Comment Letter I110. Ginny Volk-Anderson

Comment I110-1 Response: Please see response to comment I1-1.

Comment I110-2 Response: Please see response to comment I1-2.

Comment I110-3 Response: Please see response to comment I1-3.

Comment I110-4 Response: Please see response to comment I1-4.

Comment I110-5 Response: Please see response to comment I1-5.

Comment I110-6 Response: Please see response to comment I1-6.

Comment I110-7 Response: Please see response to comment I1-7.

Comment I110-8 Response: Please see response to comment I1-8.

Comment I110-9 Response: Please see response to comment I1-9.

Comment I110-10 Response: Please see responses to comments I1-10 and I1-11.

Comment I110-11 Response: Please see response to comment I1-12.

Comment I110-12 Response: Please see response to comment I1-13.

Comment I110-13 Response: Please see response to comment I1-14.

Comment I110-14 Response: Please see response to comment I1-15.

COMMENT LETTER I111. BETSY WEILAND; OCTOBER 15, 2026

Response to Comment Letter I111. Betsy Weiland

Comment I111-1 Response: Draft EIR Section 3.1.3, "Existing and Surrounding Land Uses and Zoning," describes the elevated flood-control levee along the southern boundary of the Rio Americano High School campus. Draft EIR Section 4.1, "Aesthetics," describes the levee's role in screening views of the project site from portions of the American River Parkway and separately evaluates potential visual impacts from the levee crown road, which is accessible to pedestrians and bicyclists. Draft EIR Section 4.1 (pages 4.1-8 and 4.1-18) also identifies the adjacent Rio Americano subarea as designated for "Limited Recreation" under the American River Parkway Plan. Please see Response to Comment O7-20 regarding the levee crown maintenance road and its relationship to the designated Parkway trail system. Potential project impacts on Parkway biological resources and recreational use are evaluated in Draft EIR Sections 4.2, "Biological Resources," and 5.13, "Recreation," respectively. Please see also Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use and Master Response 10: Accurate, Stable, and Finite Project Description with regard to the levee and the American River Parkway boundary and application to analysis in the Draft EIR.

COMMENT LETTER I112. TONY WHETSTONE; OCTOBER 14, 2026

Response to Comment Letter I112. Tony Whetstone

Comment I112-1 Response: Please see response to comment I1-1.

Comment I112-2 Response: Please see response to comment I1-2.

Comment I112-3 Response: Please see response to comment I1-3.

Comment I112-4 Response: Please see response to comment I1-4.

Comment I112-5 Response: Please see response to comment I1-5.

Comment I112-6 Response: Please see response to comment I1-6.

Comment I112-7 Response: Please see response to comment I1-7.

Comment I112-8 Response: Please see response to comment I1-8.

Comment I112-9 Response: Please see response to comment I1-9.

Comment I112-10 Response: Please see response to comment I1-10.

Comment I112-11 Response: Please see response to comment I1-11.

Comment I112-12 Response: Please see response to comment I1-12.

Comment I112-13 Response: Please see response to comment I1-13.

Comment I112-14 Response: Please see response to comment I1-14.

Comment I112-15 Response: Please see response to comment I1-15.

COMMENT LETTER I113. NO COMMENT

Note that numbering of received comments inadvertently skipped numbering any comment as Individual Comment I113. Therefore, no such comment letter exists and no responses are provided herein.

COMMENT LETTER I114. MARY WILSON; OCTOBER 15, 2026

Response to Comment Letter I114. Mary Wilson

Comment I114-1 Response: This comment letter (I114), along with the other comment letters submitted to the District during the public comment period on the Draft EIR, has been added to the project's administrative record. Responses to individual comments are provided in I114-2 through I114-11.

Comment I114-2 Response: Please see response to comment I1-1. Responses to additional specific issues raised in this comment are provided in I114-2 through I114-11, below.

Comment I114-3 Response: The commenter's restatement of the project components contained in Draft EIR Chapter 3, "Project Description," is noted. As suggested by the commenter, Draft EIR Section 4.2, "Biological Resources," evaluates the potential impacts of the proposed project on the Parkway including noise, vegetation, and wetland/riparian resources. The commenter's restatement from page 1 of the Bat Survey Memo (attached to the Draft EIR as Appendix C), that the installation of permanent lights and other project improvements is expected to accommodate an increase in the level of activity after sunset, is noted. The Draft EIR does not treat the proposed project as "essentially equivalent and comparable to existing nighttime activity"; rather, the Draft EIR evaluates the change that would occur from increased nighttime activity as compared to existing conditions. See also Master Response 10. No changes to the Draft EIR are required.

Comment I114-4 Response: The commenter has misstated the information provided in the Bat Survey Memo. The Draft EIR summarizes the potential environmental impacts associated with proposed project implementation, including those resource areas identified by the commenter. It does not state that those are the actual impacts expected to result from the project. It concludes that those potential impacts would not occur or would be less-than-significant.

Comment I114-5 Response: Draft EIR Chapter 3, "Project Description," fully describes all actions associated with the proposed project. As stated on Draft EIR page 3-10, no tree removal would be required for construction of any proposed project components. No changes to the Draft EIR are required.

Comment I114-6 Response: With regard to the proposed operations, how many additional evenings the stadium will be used and length of time lighting will remain on is provided in Section 3.2.3, "Schedule of Uses," of the Draft EIR, and also further addressed through Master Response 10: Accurate, Stable, and Finite Project Description. Regarding how much brighter proposed lighting would be, the existing setting and proposed project lighting conditions are described in Section 4.1, "Aesthetics," of the Draft EIR. Regarding the change in light conditions and how much additional public address and crowd noise is anticipated with the proposed project, as well as how that could result in impacts related to bats, this information is contained in Draft EIR pages 4.2-17 through 4.2-21.

Comment I114-7 Response: The Draft EIR appropriately analyzes the potential light and glare impacts associated with the Parkway in Impact 4.1-2 (Draft EIR pages 4.1-18 through 4.1-26), including two representative visual simulations from the Jedediah Smith

Memorial Trail within the Parkway (2a and 2b, on Draft EIR pages 4-21 and 4-22, respectively). Therefore, no additional visual simulations are required. The predicated illumination requested by the commenter is contained in the Musco Lighting Report (Draft EIR Appendix B).

The District's webpage for the EIR related to the improvements proposed for Rio Americano High School is as follows: https://www.sanjuan.edu/our-district/construction-news/construction-projects/exploring-stadium-improvements-at-rio-americano-high-school. There are no District exhibits showing nighttime renderings on that webpage that are related to the Draft EIR. It appears the commenter is referring to a selection on the District's webpage entitled, "Rio Americano High School stadium project design renderings now available," dated August 17, 2026. This information referred to by the commenter is not part of the Draft EIR. As stated on Draft EIR page 3-10, no tree removal would be required for demolition or construction of any proposed project components.

Comment I114-8 Response: The information requested by the commenter is contained in Draft EIR Chapter 3, "Project Description," and in the analysis and mitigation measures contained in Draft EIR Section 4.3, "Noise and Vibration." No changes to the Draft EIR are required.

Comment I114-9 Response: The commenter has misstated the information provided in the Bat Survey Memo. The Draft EIR summarizes the potential environmental impacts associated with proposed project implementation, including those resource areas identified by the commenter. It does not state that those are the actual impacts expected to result from the project. It concludes that those potential impacts would not occur or would be less-than-significant. The factual basis for concluding that the operational noise associated with the proposed project would not substantially alter wildlife use of the Parkway is explained in Draft EIR Impact 4.2-1, on pages 4.2-15 through 4.2-24. With regard to the difference in significance findings between the potential impact of noise on biological resources (Impact 4.2-1, Draft EIR pages 4.2-16 through 4.2-17 and 4.2-20 through 4.2-21) and noise impacts on surrounding residences (Impact 4.3-1, Draft EIR pages 4.3-16 through 4.3-27), the applicable thresholds and approach to impact analysis differ between the two resource topics. Distinct from the analysis of biological resources and noise, as contained in Draft EIR Impact 4.2-1 and described above in response to comment 04-22, the noise evaluation in Section 4.3 on the impact of stadium-generated noise on residences applies an industry standard threshold that considers even the intermittent, temporary increase of noise levels at residential receptors to be a significant impact. CEQA Guidelines section 15064(b)(1) explains that "[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data. An ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting. For example, an activity which may not be significant in an urban area may be significant in a rural area." (See *California Oak Foundation v. Regents of Univ. of Cal.* (2010) 188 Cal.App.4th 227, 282 [urban setting in which trees were planted lessened their biological significance]; *Eureka Citizens for Responsible Government v. City of Eureka* (2007) 147 Cal.App.4th 357, 375 ["a lead agency

has the discretion to determine whether to classify an impact described in an EIR as 'significant,' depending on the nature of the area affected"].) Similarly, a noise impact may be significant based on the adopted local policies but less than significant in terms of any biological resources impact as local noise standards would be developed based on impact on human activities and settings. See also Master Response 2 in which this is discussed further. No changes to the Draft EIR are required.

Comment I114-10 Response: Please see response to comment I1-1. No changes to the Draft EIR are required.

Comment I114-11 Response: As described on Draft EIR page 6-5, Alternative 2: Reconfigure Stadium and Athletic Fields, would move the existing Raider Stadium approximately 875 from the Parkway, while also implementing the proposed project components at the new location. This alternative includes a wider vegetative buffer, and relocating light standards further from the Parkway as suggested by the commenter. The No Project Alternative, as described on Draft EIR pages 6-4 and 6-5, would result in lower intensity lighting, reduced operating hours, and more limitations on nighttime events as suggested by the commenter. The proposed project has already been designed with shielding and precise fixture aiming, which are requested by the commenter. Restrictions on amplified sound are contained in Draft EIR Mitigation Measure 4.3-1b (Draft EIR pages 4.3-25 and 4.3-26). Therefore, no additional alternatives are required.

Comment I114-12 Response: The Draft EIR contains a thorough, detailed, quantified analysis of all of the project's potential physical impacts on the environment. Please see responses to comments I114-3 through I114-11, above. No changes to the Draft EIR are required.

COMMENT LETTER I115. DONALD YOUNG; OCTOBER 16, 2026

Response to Comment Letter I115. Donald Young

Comment I115-1 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I115-2 Response: This comment does not pertain to the adequacy of the environmental analysis contained in the EIR; the comment is noted.

Comment I115-3 Response: Please see response to comment I1-1.

Comment I115-4 Response: Please see response to comment I1-2.

Comment I115-5 Response: Please see response to comment I1-4.

Comment I115-6 Response: Please see response to comment I1-5.

Comment I115-7 Response: Draft EIR Section 4.2, "Biological Resources," provides a thorough and complete analysis of the project's potential impacts on wildlife, including both construction- and operation-related impacts (see Impact 4.2-1). No changes to the Draft EIR are required.

Comment I115-8 Response: Please see response to comment I1-6.

Comment I115-9 Response: Please see response to comment I1-7.

Comment I115-10 Response: Please see response to comment I1-8.

Comment I115-11 Response: Please see response to comment I1-10 and Master Response 10: Accurate, Stable, and Finite Project Description.

Comment I115-12 Response: Please see response to comment I1-11.

Comment I115-13 Response: Please see response to comment I1-9.

Comment I115-14 Response: Please see response to comment I1-12.

Comment I115-15 Response: Please see response to comment I1-14.

Comment I115-16 Response: Please see response to comment I1-15.

COMMENT LETTER I116. KELLA COHEN; OCTOBER 16, 2026

Response to Comment Letter I115. Kella Cohen

Comment I116-1 Response: Please see response to Comment I1-1.

Comment I116-2 Response: Please see Master Response 8: Alternatives. The commenter also brings up the Clean Water Act and the "Least Environmentally Damaging Practicable Alternatives;" these are not relevant to the proposed project as it would not trigger requirements under Section 4040 of the Clean Water Act. As noted by the commenter, the primary purpose of an alternatives analysis is to find feasible ways to avoid or substantially lessen a project's significant environmental effects. The commenter brings up greenhouse gas emissions; however, the project's impacts associated with greenhouse gas emissions was identified in the Draft EIR to be less than significant, therefore this is not a resource area of primary relevance to identifying an Alternative. Nonetheless, the commenter's assertion that the Draft EIR's discussion of greenhouse gas emissions regarding his dismissed Alternative is flawed: mobile source emissions are one of the greatest sources of greenhouse gas emissions and are not "temporary" as such emissions remain in the atmosphere for years; and transportation and land use planning to reduce vehicle trip rates and distances is key to reducing a community's greenhouse gas emissions. In addition, a comparing the dismissed Alternative's generation of greenhouse gas emissions to biological resources impacts has no valid comparison. Note that the Draft EIR did calculate construction-related GHG emissions, and found them to be 102 Metric Tons (Draft EIR table 5.6-1), which would only be generated during construction and then would cease. CEQA does not require quantification of embedded/material GHG emissions (e.g., upstream manufacturing of cement, steel, asphalt, or other materials) as a life-cycle assessment, but the District does recognize these additional emissions that would not be associated with using an existing stadium. The commenter suggests that the proposed project would "introduce decades of localized energy consumption," while using an existing stadium would "optimize regional resources without compounding the localized energy grid footprint." As the proposed project is at an existing school, there is no expansion of regional energy infrastructure (grid footprint) required. In addition, the proposed system would use the newest technology and replace older systems and diesel-powered portable lights, thereby improving energy efficiency of the existing stadium. Mobile emissions are not easily mitigable when a project drives an increase in vehicle trips and distances. Please see Master Response 8: Alternatives.

Comment I116-3 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for further discussion of the Wild and Scenic Rivers Act, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional discussion of potential effects on Parkway wildlife.

Comment I116-4 Response: Please see Master Response 1: Consistency with Applicable Zoning and Other Regulations Governing Land Use for further discussion of the Wild and Scenic Rivers Act, and Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional discussion of potential effects on Parkway wildlife.

Comment I116-5 Response: The Draft EIR (page 4.1-24 and 4.1-25) discusses skyglow and how the lighting design is developed specifically to minimize skyglow and glare. Nonetheless, without modeling, the Draft EIR did find this impact to be potentially significant and identified Mitigation Measure 4.1-2, which requires the District to obtain a "pass" rating from the Dark Sky Association prior to the start of construction activities. The lighting system for the proposed project has been designed to meet Dark Sky certification, as detailed in the Musco Lighting Report attached as Draft EIR Appendix B, and discussed in Draft EIR Impact 4.1-2. If for some reason, the Dark Sky Association were to determine that the system as designed does not meet their criteria, Mitigation Measure 4.1-2 appropriately states that the system would be redesigned as necessary. Furthermore, the required "pass" rating has since been received from the Dark Sky Association and is attached to this FEIR as Appendix B. No changes to the Draft EIR are required.

Regarding light trespass into the American River, the Draft EIR presented data from the Lighting Report (attachment B to the Draft EIR). As noted on Draft EIR 4.1-0, 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). There was no evidence to suggest that additional modeling at greater distances would be necessary. See Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife for additional discussion of lighting and circadian rhythm.

Comment I116-6 Response: The commenter's concern over noise is noted. However, this comment does not pertain to the adequacy of the environmental analysis.

Comment I116-7 The Draft EIR concludes that operational stadium event noise would remain significant and unavoidable after implementation of feasible mitigation. Mitigation Measure 4.3-1b provides the following requirements of the public address system:

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.*

Comment I116-8 Response: See Master Response 2: Nighttime Light and Glare Impacts and Noise Impacts on Wildlife.

Comment I116-9 Response: Mitigation Measure 4.3-1b includes the requirement that 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. As the District is not in full control of athletic event schedule because it is often coordinated amongst several sports, field uses, and other schools, and because one objective of the proposed project is to increase flexibility in scheduling, further limiting this time to earlier is not feasible.

Table 3-1 of the Draft EIR presents existing and anticipated uses with the proposed project. Raider Stadium is already extensively used and, while some events may shift in time, the primary new uses would be football games, and school assemblies and other school-sanctioned events, limiting the use of Raider Stadium would negate the objectives of the project.

Comment I116-10 Response: Mitigation Measure 4.3-1b includes the requirement that "Where public address system use is not necessary for a particular event or activity, use of the public address system shall be prohibited.

Comment I116-11 Response: Contrary to the commenter's assertion, the Draft EIR does not rely on vegetative buffers for noise dampening. Rather, Mitigation Measure 4.3-1b contains those features identified in response to Comment I116-8 , as well as mitigation associated with the bleachers as shown here (note that underline text is proposed additional, as included in Chapter 3, "Errata," to this EIR).

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, seating, and floorboards; or absorptive or shielding material along bleacher sides, provided that these features do not interfere with safety, drainage, accessibility, maintenance, or spectator sightlines. Absorptive or shielding material should be focused on the eastern and northeastern corner of the visitor bleachers and the eastern and southern sides of the home bleachers and should be approximately three feet higher than the floorboards on the sides and five feet higher than the floorboards in the back of the home bleachers.

Comment I116-12 Response: This comment does not pertain to the adequacy of the environmental analysis; the comment is noted.

3 ERRATA

Chapter 3 identifies revisions to the Draft EIR. The changes are presented in the order in which they appear and identified by page number. Text deletions are shown in strikeout (~~strikeout~~) and additions are underlined (underlined). These edits provide clarifications or additional supportive information and do not change the analysis or conclusions of the Draft EIR.

Text changes (including changes to tables and figures in the Draft EIR) are presented in the page order in which

they appear in the Draft EIR. As indicated in Chapter 1, "Introduction," the entirety of the Rio Americano High School Stadium Improvements Project Final EIR consists of the Draft EIR, together with this Response to Comments document, including all attachments. Therefore, the Draft EIR changes presented in this chapter are incorporated in and supersede corresponding original text in the Draft EIR.

Under CEQA, recirculation of all or part of an EIR is required if significant new information is added after public review and prior to certification. According to State CEQA Guidelines Section 15088.5(a), new information is not considered significant "unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." More specifically, as discussed in Chapter 1, Introduction, of this document, pursuant to CEQA Guidelines Section 15088.5(a), recirculation of a Draft EIR is required only if:

1. a new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented

2. a substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance;

3. a feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it; or

4. the draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded."

5. None of the changes to the Draft EIR identified in this document meet any of the above conditions. Therefore, recirculation of any part of the Draft EIR is not required.

1 EXECUTIVE SUMMARY

DRAFT EIR page 1-4, the second bullet point under Mitigation Measure 5.2-1 is hereby revised as follows:

- 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~~shall be covered.

Draft EIR page 1-5, the continued text (first bullet point) under Mitigation Measure 5.2-1 is hereby revised as follows:

- All roadways, driveways, sidewalks, parking lots to be paved ~~should~~shall be completed as soon as possible. In addition, building pads ~~should~~shall be laid as soon as possible after grading unless seeding or soil binders are used.

Draft EIR page 1-9, the text in the first paragraph under Mitigation Measure 5.3-2 is hereby revised as follows:

- In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work ~~must~~shall halt within a 100-foot radius of the discovery.

Draft EIR page 1-15, the bullet points under Mitigation Measure 4.4-3c are hereby revised as follows:

- The intersection of American River Drive and Saverien Drive ~~should~~shall serve as the main entrance and exit for attendees using on-site parking. The entryway immediately west of this intersection ~~should~~shall be closed to minimize conflict points.

- The intersection of American River Drive and the westernmost Rio Americano High School Driveway access ~~should~~shall remain open for attendees and signage ~~should~~shall be used to direct attendees to Parking Lot 2 and guide them from Parking Lot 2 to Raider Stadium.

Draft EIR page 1-16, the continued bullet points under Mitigation Measure 4.4-3c are hereby revised as follows:

- The intersection of American River Drive and the easternmost Rio Americano High School Driveway access ~~should~~shall also function as a secondary entry and exit for attendees. The two access points between Parking Lots 4 and 5 ~~should~~shall remain open to facilitate traffic flow, especially in the event of overflow parking.

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment ~~must~~shall be checked by a certified mechanic and determined to be running in proper condition before it is operated.

3 PROJECT DESCRIPTION

Draft EIR page 3-4, the last paragraph is hereby revised as follows:

- 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~~ 12 new 15-foot-tall light poles would be installed between the ~~south~~ north 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. Access gates that serve as part of the egress path leading into or through the safe dispersal area would be installed with and additional safety egress lighting at these gateways.

Draft EIR page 3-6, the first paragraph is hereby revised as follows:

- 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.~~ Each fixture attachment would contain between one and

eight fixtures (or luminaires), and there would be a total of 16 fixtures (or luminaires) per pole, for a total of 64 fixtures among all four stadium lighting standards (poles). All luminaires would be mounted at varying heights, ranging from 16 to 80 feet above grade.

Draft EIR page 3-11, the second paragraph is hereby updated:

- Total ground disturbance is estimated to be approximately ~~2,900~~3,200 square feet of trenching along the pedestrian access pathway, and approximately ~~5~~10,~~20~~450 square feet of hardscape and ~~8~~12,725~~00~~ square feet of unpaved disturbance areas adjacent to the existing track for the installation of bleachers and lighting at the stadium

4.2 BIOLOGICAL RESOURCES

Draft EIR page 4.2-18, the third paragraph is hereby revised as follows:

- In addition, the proposed lighting plan for the proposed project ~~was~~ will be submitted to the International Dark-Sky Association for validation prior to project construction that it meets the criteria in the Community Friendly Outdoor Sports Lighting program.

Draft EIR page 4.2-19, the first paragraph is hereby revised as follows:

- 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 maternity season and nesting bird season.

Draft EIR page 4.2-24, the second paragraph is hereby revised as follows:

- Riparian habitat is present in the Parkway ~~100 feet south of the project site~~140 feet south of proposed project improvements and approximately 105 feet south of the southern boundary of the Rio Americano High School, and would not be removed during project construction.

Draft EIR page 4.2-25, the first paragraph is hereby revised as follows:

- Therefore, the operational lighting would result in ~~no impact~~a less-than-significant impact on the movement of any native resident or migratory fish or wildlife species or use of wildlife corridors.

4.3 NOISE AND VIBRATION

Minor edits are made to Section 4.3 to revise an update to the modeling; these revisions do not change any determination of significance. Supporting modeling files are provided in Attachment D to this Final EIR.

Table 4.3-1 on Draft EIR page 4.3-3 has been revised to refine the column headers indicating the daytime and nighttime hours and to update the data points that were transposed between two measurement locations.

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~~ 10 p.m.) L_{eq}	Measured Sound Level, dBA Daytime (7 a.m.–~~7~~ 10 p.m.) L_{max}	Measured Sound Level, dBA Nighttime (~~7~~ 10 p.m.–7 a.m.) L_{eq}	Measured Sound Level, dBA Nighttime (~~7~~ 10p.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~~ 00	24 Hour	51	~~66~~76	~~46~~45	~~54~~66	53
ST-01	On site, north of project site by residences along American River Drive	9-17-2025	14:~~33~~ 04	0:20	62~~57~~	75~~86~~	NA	NA	NA
ST-02	On site, west of project site by school basketball fields	9-17-2025	14:~~04~~ 33	0:20	~~62~~57	~~75~~86	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

Exhibit 4.3-1 on Draft EIR page 4.3-4 has been revised to fix a label in which two measurements were identified with the same number.

The updated Exhibit is presented herein.



Exhibit 4.3-1 Ambient Noise Survey

Table 4.3-2 on Draft EIR page 4.3-5 has been revised to refine the column headers indicating the daytime and nighttime hours and to fix the location identified for two measurement locations.

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~~ 10 p.m.) L_{eq}	Measured Sound Level, dBA Daytime (7 a.m.–~~7~~ 10 p.m.) L_{max}	Measured Sound Level, dBA Nighttime (~~7~~ 10 p.m.–7 a.m.) L_{eq}	Measured Sound Level, dBA Nighttime (~~7~~ 10p.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~~70.7	47.3	~~58~~66	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~~75.8	48	~~57~~65.8	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~~80.3	53	~~70~~75.1	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~~ 10 p.m.) L_{eq}	Measured Sound Level, dBA Daytime (7 a.m.–~~7~~ 10 p.m.) L_{max}	Measured Sound Level, dBA Nighttime (~~7~~ 10 p.m.–7 a.m.) L_{eq}	Measured Sound Level, dBA Nighttime (~~7~~ 10p.m.–7 a.m.) L_{max}	dBA, Ldn
ST-04-Game	~~Southern~~ Northern 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~~ Southern 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~~04, ST-02/ST-05, and ST-03/ST-~~04~~ 06 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

Draft EIR page 4.3-9, the text in the first paragraph is hereby revised as follows:

- ~~Eight~~Six-hour measurements began at 4:00 p.m., and short-term measurements were conducted during the evening game period. The ~~eight~~six-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~~…. Results show that the six-hour energy-average noise levels were 68.7 dBA L_{eq} behind the eastern bleachers and 78.7 dBA L_{eq} behind the western bleachers, with corresponding highest measured maximum levels of 96.0 and 99.5 dBA L_{max}, respectively~~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 68.7 and 66.3 dBA L_{eq}, respectively, over their corresponding measurement periods~~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 energy-average levels of 77.7 to 78.7 dBA L_{eq} over their respective measurement periods~~average levels of 75 to 78 dBA L_{eq}~~, illustrating the influence of amplified sound and concentrated crowd activity.

Draft EIR page 4.3-24, the text in the second to last paragraph is hereby revised as follows:

- Maximum noise levels ranged from 78.7 to 99.5~~92.7~~ dBA L_{max}. The highest maximum level, 99.5~~92.7~~ dBA L_{max}, was measured behind the western bleachers near the announcer cabin and speaker system; other maximum levels were ~~87.9~~96.0 dBA L_{max} behind the eastern bleachers near the residential fence line;

Draft EIR page 4.3-26, the text in the second to last paragraph is hereby revised as follows:

- Maximum reference football game noise levels of ~~79~~ 78.7 to ~~93~~ 99.5 dBA L_{max} at 50 feet would attenuate to approximately ~~62~~ 61.8 to 82.5~~76~~ dBA L_{max} at 350 feet.

Mitigation Measure 4.3-1b has been refined as follows:

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

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. Testing shall include representative high-output announcer speech and recorded playback using the final system settings and sound-limiting controls.

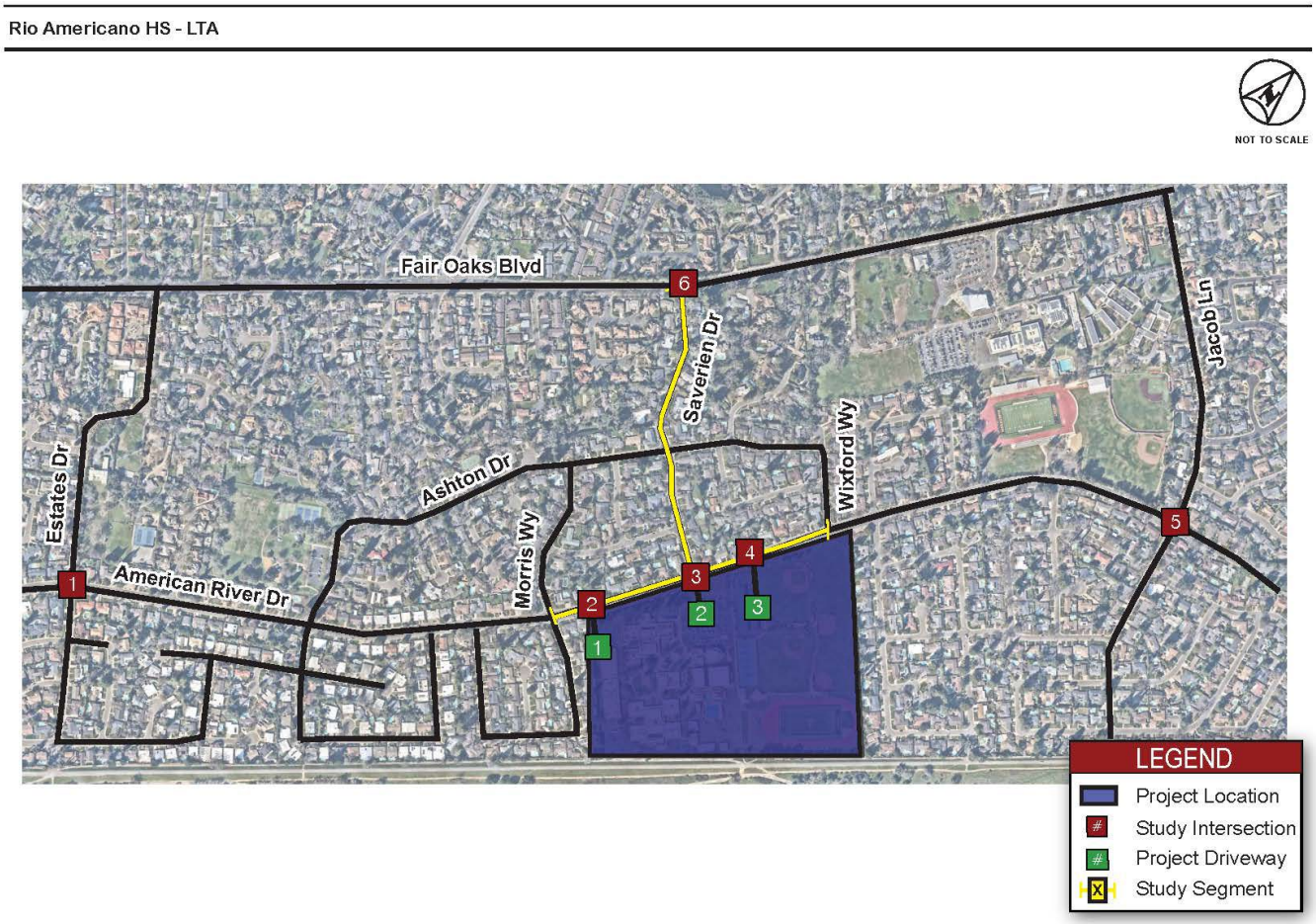
- …

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, seating, and floorboards; or absorptive or shielding material along bleacher sides, provided that these features do not interfere with safety, drainage, accessibility, maintenance, or spectator sightlines. Absorptive or shielding material should be focused on the eastern and northeastern corner of the visitor bleachers and the eastern and southern sides of the home bleachers and should be approximately three feet higher than the floorboards on the sides and five feet higher than the floorboards in the back of the home bleachers.

4.4 TRANSPORTATION AND CIRCULATION

Exhibit 4.4-1 on Draft EIR page 4.4-2 has been revised to address a technical error or roadway and basemap alignment. The updated Exhibit is presented herein:



Draft EIR page 4.4-15, Mitigation Measure 4.4-3b is hereby revised as follows:

> **Mitigation Measure 4.4-3b: Implement an Event ~~Transportation~~ Management Plan**
>
> By the start of the school year in the project's first year of operation~~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

Draft EIR page 4.4-16, Mitigation Measure 4.4-3c is hereby revised as follows:

Mitigation Measure 4.4-3c: Event Management Plan Minimum Transportation and Circulation Content ~~High-Capacity Event Access and Circulation Management~~

By the start of the school year in the project's first year of operation, the District shall have on file an Event Management Plan, one part of which shall address transportation and circulation and incorporate the requirements of Mitigation Measure 4.4-3b. The plan shall be prepared by a qualified professional using recognized special-event and traffic-control guidance, including the FHWA handbook Managing Travel for Planned Special Events, Part 6 of the California MUTCD, and the FHWA Guide for Improving Pedestrian Safety at Uncontrolled Crossing Locations. The plan shall apply to all varsity home football games and to any other stadium event anticipated to require off-site parking (Mitigation Measure 4.4-3a). At a minimum, the transportation and circulation part shall include the following sections:~~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:~~

a. **Attendance Limit. The District shall limit all events utilizing the stadium improvements to 3,400.**

b. **Event determination.** A District designee decides whether an event is covered, what information is used (presales, comparable events, opponent), and when the decision is made and documented.

c. **Parking.** On-campus lot allocation, opening of the Lot 6 overflow area, Jesuit High School shared parking (Mitigation Measure 4.4-3a), designated legal off-site parking, and lot-full procedures.

d. **Access and internal circulation.** The intersection of American River Drive and Saverien Drive shall~~should~~ serve as the main entrance and exit for attendees using on-site parking. The entryway immediately west of this intersection shall~~should~~ be closed to minimize conflict points. The intersection of American River Drive and the westernmost Rio Americano High School Driveway access shall~~should~~ remain open for attendees and signage shall 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 shall~~should~~ also function as a secondary entry and exit for attendees. The two access points between Parking Lots 4 and 5 shall~~should~~ remain open to facilitate traffic flow, especially in the event of overflow parking.

e. **Traffic control and staffing.** Staffed locations, roles, training, and deployment through arrival and post-event departure. Coordination with Sacramento County on any traffic control in the public right-of-way and on event signal timing at Fair Oaks Boulevard and Saverien Drive.

f. **Pedestrian and bicycle safety.** Designated crossings and treatments identified in the LTA, pedestrian routes and lighting, and access to the American River Parkway trail.

g. **Emergency access.** Keeping driveways, fire lanes, and emergency routes clear, and coordinating with fire and law enforcement agencies.

h. **Communication.** Advance information for attendees and visiting schools, wayfinding signs, and a neighborhood contact.

i. **Monitoring and corrective action**. Observations at the first highly attended event of each season, with results documented. Corrective actions are required if queues or parking obstruct travel lanes, bicycle lanes, sidewalks, crosswalks, driveways, or emergency routes. They may include more staff or third-party traffic control, revised driveway assignments, County-coordinated event signal timing, more use of Jesuit parking, shuttles, and staggered release.

The District shall implement the plan at each covered event and update it as monitoring warrants.

4.5 TRIBAL CULTURAL RESOURCES

Draft EIR page 4.5-12, Mitigation Measure 4.5-1c is hereby revised as follows:

- 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).

5.2 AIR QUALITY

Minor edits are made to Section 5.2 to revise an update to the modeling; these revisions do not change any determination of significance. Supporting modeling files are provided in Attachment E to this Final EIR.

Draft EIR page 5.2-3, the second bullet point under Mitigation Measure 5.2-1 is hereby revised as follows:

- 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~~shall be covered.

Draft EIR page 5.2-4, the continued text (third bullet and last point) under Mitigation Measure 5.2-1 is hereby revised as follows:

- All roadways, driveways, sidewalks, parking lots to be paved ~~should~~shall be completed as soon as possible. In addition, building pads ~~should~~shall be laid as soon as possible after grading unless seeding or soil binders are used.

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment ~~must~~shall be checked by a certified mechanic and determined to be running in proper condition before it is operated. Draft EIR Appendix G, "Air Quality and Greenhouse Gas Data and Collections," has been updated and is Attached to this Final EIR as Attachment E.

Table 5.2-2

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)

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~~0.08	~~0.005~~0.02
SMAQMD Significance Threshold [1]	65	65	80	82	14.6	15
Emissions Exceed SMAQMD Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

5.3 CULTURAL RESOURCES

Draft EIR page 5.3-13, the text of the second to last paragraph is hereby revised as follows:

- Moreover, previous development and associated sub-surface excavation at the project site, including trenching at a depth of three and four feet and 18 inches wide for electrical, gas, water, and sewer lines for the buildings at the site, would further limit the likelihood of encountering buried cultural resources.

Draft EIR page 5.3-13, the text of the first paragraph of Mitigation Measure 5.3-2 is hereby revised as follows:

- Mitigation Measure 5.3-~~1~~2 provides appropriate actions for inadvertent discovery of cultural resources (excluding human remains, which are addressed below). Implementation of Mitigation Measure 5.3-~~1~~2 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.

Draft EIR page 5.3-14, the text of the paragraph for significance after mitigation is hereby revised as follows:

- In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work ~~must~~shall halt within a 100-foot radius of the discovery.

Draft EIR page 5.3-14, the text of the second to last paragraph is hereby revised as follows:

- There has been no indication or evidence that the project area has been used for human burials.

5.6 GREENHOUSE GAS EMISSIONS

Draft EIR Table 5.6-1 has herby been revised as follows:

Source	GHG Emissions (MT CO_2e per year)
Total Construction Emissions	102
Operational Mobile	~~18~~79
Operational Energy	2
Operational Refrigerants	7.8E-05
Total Annual Operational Emissions	~~20~~81
SMAQMD Significance Threshold	1,100
Emissions Exceed SMAQMD Threshold?	No

5.9 LAND USE AND PLANNING

Draft EIR page 5.9-29, the following change is hereby made:

- **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.**~~ **Less-than-Significant 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) … Therefore, this impact would be **less than significant**.

Draft EIR page 5.9-30, the following changes are hereby made:

- …section 4.~~2~~1, "Aesthetics."

5.13 RECREATION

Draft EIR page 5.13-33, the text of the first paragraph under Impact 5.13-1 is hereby revised as follows:

- The proposed improvements at the existing Raider Stadium would support continuing existing athletic~~,~~and educational ~~and community events~~ on campus and would not increase school enrollment or create new demand for off-site recreation.

6 ALTERNATIVES

Draft EIR page 6-7, the following text changes are hereby made to the last paragraph:

- The sports lighting would be located ~~closer to~~further from American River Parkway and relatively ~~more~~less visible from this public viewing location compared to the visibility of lighting under the proposed project.

Draft EIR page 6-17, the following text is hereby added to the end of the first paragraph:

- CEQA Guidelines Section 15126.6(e)(2) requires that if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. The Draft EIR evaluates two alternatives: Alternative 1: No Project, and Alternative 2: Reconfigure Stadium and Athletic Fields. As stated above, the No Project Alternative would be environmentally superior. The alternative other than the No Project Alternative that would be environmentally superior is Alternative 2: Reconfigure Stadium and Athletic Fields.

7 CUMULATIVE IMPACTS AND OTHER CEQA CONSIDERATIONS

Draft EIR page 7-2, footnote to Table 7-1 has been hereby revised as follows:

- IDA = ~~International Detailing Association~~ International Dark-Sky Association (also known as DarkSky International)

Draft EIR page 7-11, the first paragraph has been hereby revised as follows:

- As discussed in Section ~~3.14~~4.1, "Aesthetics,"

Draft EIR page 7-14, the paragraph under "7.4 Significant and Unavoidable Adverse Impacts" has been hereby revised as follows:

- Section 1512~~21~~6.2(b) of the CEQA Guidelines

Draft EIR page 7-17, the last paragraph has been hereby revised as follows:

- Therefore, even with implementation of Mitigation Measure 4.3-~~2~~1b, stadium event noise impacts during intermittent high-capacity events would remain significant and unavoidable.

8 REFERENCES

The following references to "4.4 Transportation and Circulation" of Chapter 8, Reference" on Draft EIR page 8-4 have been revised to list the correct document date.

Kimley-Horn and Associates, Inc.

_____. 2026a. Rio Americano High School Stadium Lighting Local Transportation Analysis. September 1~~August 25~~, 2026. Sacramento, California.

_____. 2026b. Rio Americano High School Stadium Lighting Vehicle Miles Traveled Analysis. September 1 ~~August 25~~, 2026. Sacramento, California.

11 APPENDICES

Draft EIR Appendix A, "Notice of Preparation and Comment Letters," is hereby revised to include the following comments on the NOP that were inadvertently not shown in Draft EIR Appendix A.

The District determined that these letters were inadvertently omitted from the compilation in the Draft EIR of comments received on the District's Notice of Preparation. These comments have been reviewed and have determined that all of the issues raised in your letter were addressed in the Draft EIR or through revisions in this Final EIR

ERRATA TO DRAFT EIR APPENDIX A, LETTER #1, SAVERIANO AND CONSTANCE DEL REAL, FEBRUARY 3, 2006

February 3, 2026

Dear Mr. Nicholas Arps et al:

Thank you for the opportunity to submit our scoping comments for the Environmental Impact Report (EIR) being prepared for the proposed Rio Americano High School Stadium Improvement Project.

First and foremost we insist on a full and comprehensive Environmental Impact Report (EIR).

In the latter part of 2025, the Rio Americano HS stadium project was announced not as a stand alone project but as a part of a larger endeavor which also included removing the existing swimming pool and tennis courts and constructing a new swimming pool and new tennis courts along with constructing a cell tower all to be against or near the levee west of the existing stadium. The construction of such a major project of this magnitude would result in cumulative adverse environmental impacts during construction requiring such an EIR to address matters like the impact on the integrity of the flood control system in the area of the high school. The initial study does not specify where the very high stadium lights would be placed, the drilling of holes three feet in diameter and sixteen feet deep close to the toe of the levee which could result in boils during times of very high river levels. A similar concern arising from the excavation of soil for the new swimming pool should also be examined.

The EIR must also address the permanent impacts on the surrounding neighborhood of the proposed stadium project such as:

- Increased noise and traffic on and around American River Drive

- Parking problems in surrounding neighborhoods. Rio Americano HS only has 254 parking spaces and yet is proposing a 2500 seat stadium. Where will possibly over 2000 cars park?

- Cell tower, lighting, noise and air pollution affecting our most precious jewel, the American River Parkway, its animals, birds and nesting areas

- Noise will travel across the river at nights to affect neighbors in Rancho Cordova

- Trespass lighting into many home windows

- Vandalism and trash

- Damage to roads

- No security to protect neighbors

- The aesthetics of the American River Parkway will be ruined

- What is the impact of two lighted stadiums (Jesuit HS and Rio Americano HS) within 1/3 of a mile apart? Especially if they have home games on the same night

In addition, as residents whose property (730 Morris Way) abuts Rio Americano HS we routinely experience major traffic jams (some arriving as early as 30 to 45 minutes before school dismissal) on Morris Way primarily caused by after school "pickups" (see attached two photos) resulting in added air pollution (fyi on cold days many motorists leave their cars on for I presume warmth and on warm days

they leave their cars on for I presume cooling), noise pollution (cars, people, music, etc.), garbage dumped on the sidewalks and even in our ivy.

In conclusion, we fear that some and/or all of the foregoing concerns/experiences will be exacerbated and extended into late nights when crowds of up to 2500 are expected to gather for events not only for Friday night football games but also as stated by a SJUSD rep at the 10-13-25 neighborhood meeting for "community events", therefore, disrupting our greatly appreciated quiet, restful and safe evenings. Our further fear is that the stadium lights will be on not only for school sponsored sports programs/activities but also for boy's and girl's club sports such as rugby, soccer, lacrosse, etc. and possibly for concerts and/or other large attended events.

Lastly, it is our feeling that money should be spent on repairs, upgrades and overall modernization of the existing structures and facilities. The lead and asbestos that currently exists in the school needs to be removed. The roof and plumbing is in dire need of significant repairs to eliminate roof leaks and flooding. Money should also be set aside for the maintenance of the school campus. Rio Americano HS was originally built as a temporary school structure and still maintains that interim look. The school needs and deserves a face lift.

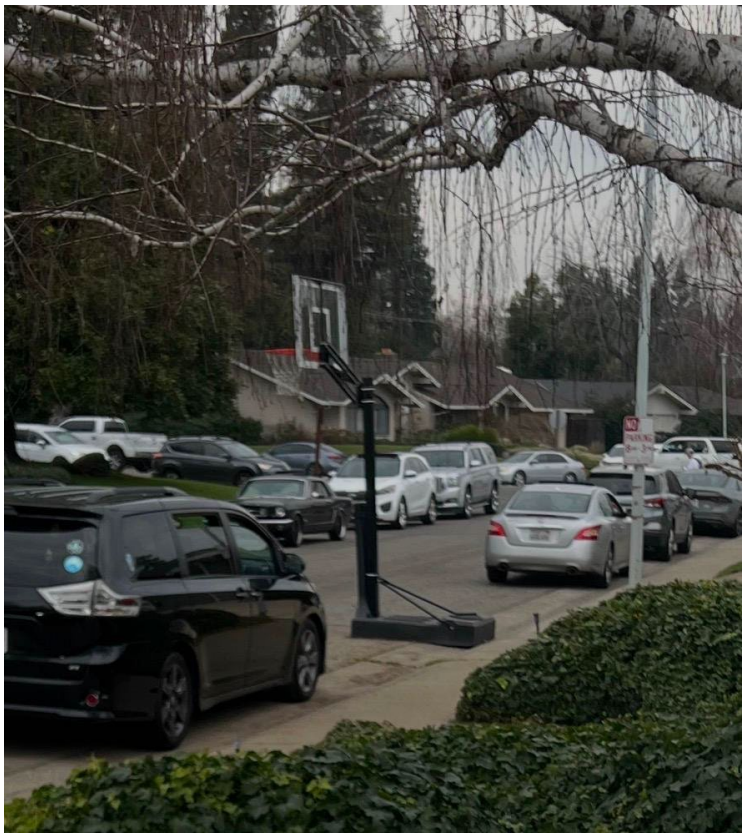
Thank you again for the opportunity to provide our scoping comments on this major project that will permanently effect our great neighborhood.

Sincerely,

Severiano Del Real
Constance Del Real
730 Morris Way
Sacramento, CA 95864
(916)402-6030 (cell)
(916)971-3191 (home)
cldelreal@yahoo.com

Attachments (2 photos)





Feb 5, 2026

San Juan Unified School District (SJUSD)
3738 Walnut Avenue
Carmichael, CA 95608
construction@sanjuan.edu
CC: nicholas.arps@sanjuan.edu; legalservices@sanjuan.edu;
mbassanelli@sanjuan.edu; info@sanjuan.edu

Subject: Formal Comment to SJUSD preliminary Initial Study and Notice of Preparation and scope for upcoming Environmental Impact Report (EIR) for the proposed Rio Americano Stadium Project

Dear San Juan Unified School District (SJUSD),

Please consider this my formal comments to **San Juan Unified School District (SJUSD) preliminary Initial Study and Notice of Preparation and scope changes needed for the upcoming Environmental Impact Report (EIR) for Rio Americano High School Stadium Project.**

I respectfully insist **San Juan Unified School District (SJUSD)** conduct **a full comprehensive Environmental Impact Report (EIR),** required under the California Environmental Quality Act (CEQA) and commit to responsible decision-making that respects, supports, and upholds the values protections, and benefits of the Lower American River and Parkway and the public.

SJUSD must ensure the EIR scope is expanded and modified to identify, study, and analyze all impacts to the Lower American River Parkway, upholds and ensures protections for this protected Wild & Scenic River, wildlife, natural habitat, wildlife corridors, river, waters (flowing, ground, and surface), environment, biological resources, natural resources, recreational values and benefits of the natural parkway, protections of sensitive habitat, dark skies, natural setting and environment, that upholds protections of this public trust resource, economic values, public use and enjoyment, health and wellness benefits, as well as all impacts to surrounding neighborhoods, communities, and public (on both sides of the river).

SJUSD's proposes stadium project will result in **a high intensity sport and event stadium at Rio Americano High School –** by converting an existing athletic field at Rio Americano High School to include permanent stadium lights (up to 80-100ft), an elevated press box (with HVAC system), bleachers to support a substantially increased capacity of 2500 attendees (vs 288 today), amplified sound system, speakers mounted to stadium structures, and other features. The planned stadium features, size, scale, excessive hours, substantially increased capacity, frequency, duration, and intensity of uses, and planned operations and uses throughout the day and year-round by school and non-school sports, activities, and other events will overwhelm and result in

numerous significant impacts to the Parkway, the public, wildlife, surrounding communities, and more.

The proposed stadium is adjacent a protected and environmentally sensitive area of the Wild & Scenic American River Parkway, wildlife, the public, and surrounding communities on both sides of the river that will be significantly impacted on a recurring basis.

Therefore, I respectfully insist the following changes to the scope and upcoming Environmental Impact Report (EIR) study SJUSD is preparing for – which I:

- **Insist SJUSD conduct a full comprehensive Environmental Impact Report (EIR)**, not a focused or limited EIR.
- **Insist SJUSD identify, study and analyze all impacts from the proposed stadium features**, **increased scale, increased capacity, increased frequency of use, hours, duration, intensity, and planned operations** on the American River Parkway, wildlife, wildlife corridors, waters, habitat, biological resources, natural resources, the public, and more. The natural setting and recreational values of the Parkway are important for many reasons, which include its value to the public, public use and enjoyment of the parkway, public safety, public health and wellness, use and enjoyment of the natural settings for passive recreation, connect with nature, place of calm amid busy world, as well as many other benefits.
    - The American River Parkway conservation and protections are important to the public, communities, and SJUSD must uphold the Wild & Scenic River values and other protections bestowed by the public to protect nature, wildlife, habitat, and values for the public – which is a local, state, and national treasure. The impacts to species who rely upon the American River Parkway (including threatened and endangered) as well as hundreds of other wildlife and species that live, hunt, breed, bromate, raise their young, feed, find cover, and rely on critical and essential habitat must be considered and studied, There are ongoing restoration areas for endangered species near Rio Americano, that will be impacted.
- **Insist EIR identify, study, and analyze impacts beyond current project boundaries and construction timeline,** as significant impacts will occur well beyond the campus.
    - Numerous potential significant impacts surpass stadium site boundaries and construction period. Surrounding areas must be studied and impacts identified.
    - The study area and timeline must be expanded to include surrounding areas and foreseeable impacts from planned stadium use.

- There will be permanent and significant ongoing impacts from this stadium features, scale, use, hours, intensity, and operations on the public, the Wild & Scenic American River Parkway, wildlife, habitat, environment, public health and well-being, surrounding communities, and public trust resources.

- **The context, scope, topics, locations, and areas of study for the upcoming EIR must be reworked to adequately reveal true impacts** - including numerous significant impacts - that SJUSD has either not included, prepared for, and or dismissed.

- **Insist EIR address new challenges and serious impacts that have not yet been considered or included that CEQA requires.** This requires modification to the EIR scope, topics, areas of study and categories to be expanded and reworked.

  - For example, new risks to the parkway, public safety issues, public service demands on the parkway, as well as impacts surrounding communities on both sides of the river will occur. They must be identified, studied, and analyzed.

    - Supporting and managing crowds of this size in the context of this location differ and must be addressed. There are numerous foreseeable impacts, increased infrastructure needs, public service demands and new challenges SJUSD does not seem to account for.

    - In addition, infrastructure and other services are lacking in the current plan for planned stadium use at this campus, which must be addressed by SJUSD. This is important to safely support this increased capacity and use, as well as protect the public, surrounding communities, and address other significant impacts.

      - **The impacts are disproportionately greater and magnitude of impacts much higher than SJUSD is acknowledging and or currently realized**.

- **Insist EIR identify, study and analyze cumulative impacts,** including other proposed Rio Americano projects (as many have similar harms and areas of significant impact).

- **Insist EIR identify, study, and analyze other alternatives - including the no project alternative** in the upcoming CEQA Environmental Impact Report (EIR).

- **Insist SJUSD uphold protections for the Wild & Scenic American River Parkway, wildlife, the public, and surrounding neighborhoods and community** (on both sides of the river).

- **Insist SJUSD expands the scope of the EIR and conduct an honest and complete analysis**. SJUSD's current Notice of Preparation and preliminary Initial Study are deficient, too narrow in areas of study, impact, timeline and boundaries.

- **SJUSD must adjust the scope, topics, boundaries, timeline, and potential impacts for the upcoming EIR study. This then requires categories, topics, required studies and analysis to be revised.**

Finally, SJUSD's Initial Study and NOP are deficient, overly narrow, and inconsistent with CEQA requirements, dismissive of scope necessary to capture true study of impacts beyond the project site and construction period. The stadium project is substantial and major change that must be reviewed in a full comprehensive EIR. SJUSD's premature assessment and assumptions in initial study made thus far appear incorrect, unsubstantiated in many instances, and omit serious potential impacts, many of which will be permanent and significant impacts)

These deficiencies misconstrue, understate, and or do not account for major changes and numerous potential significant of this project and incorrectly steers the EIR. This not only fails to meet the need of the public and decision makers, it also fails to identify and address serious potential harms and impacts to the Parkway, surrounding areas, the public, and more…it damages public trust.

The Wild & Scenic designated Lower American River and Parkway (that Rio Americano campus is directly against) is one of the most important places and public trust resources in our region, and is a local, state and national treasure. It receives over 8 million visits each year, drives $365M to the regional economy as a natural living, breathing river. Please don't let the close proximity and ease of accessing this amazing Wild & Scenic River fool and or mislead you of its brilliance, its importance, and confuse SJUSD board, staff, and even students of both the obligations and the opportunity in front of SJUSD that has not been realized.

- Eagles are flying and nest here, otters play, feed and rear their young, beavers live, rely upon, and support the ecosystem and waters, waterbirds, resident and migratory birds, deer rest, feed, sleep, coyotes, bobcats, turtles (including the only known fresh water turtle in CA exist, bromate, feed, nest, and rely on this habitat.
- Salmon and steelhead (both endangered and threatened) spawn in the very gravel and waters of the sensitive habitat on the parkway in the river shallows mere feet from the stadium, juveniles rest, hide, feed here, over 40 species of fish are in this river.
- People come to find respite and calm on it trails, amid nature, its water, and place of escape and power of connecting with nature that is profound importance.
- There is rich history and culture that dates back over 12,000+ years, that exists and is valued.
- And many students and members of the public, across the region and people of all ages find value and benefit here. This includes Rio Americano students and other young adults who are discovering the magic of the Parkway (many for the

first time), what is there, and just beginning to understand what it takes to protect it, gaining new perspective, and finding place that nurtures them, a place they want their family and friends to experience or see.

- And parkway visitors (new and old) continue to be amazed at the wildlife that exists here (which many unaware) and awed at what it takes to protect this Wild & Scenic American River Parkway so it continues now and future for all.
- It's an incredible resource relied upon, critical to, and valued by others that takes all of us to care, steward, and at times set aside what serves us – to instead serve this unique land, river, and wildlife – which is quite significant.

What SJUSD does, and what we all do matters. There is just cause for SJUSD to slow down, gain wisdom of this unique place, and begin to understand what is here and what it takes to protect it.

In closing the scope deficiencies must be corrected to ensure an honest, complete, and legally adequate environmental review.

Thank you for allowing me to provide these comments.

Sincerely,

Julie Gabele
Sacramento, CA



January 14, 2026

To: Frank Camarda
Chief Operations Officer

My name is Dale Vaira and I am a neighbor of Rio Americano High School.
I attended your January 7, scoping meeting and left the meeting very confused and unhappy.
If you are really looking for neighbor feed back, why was not more detailed information provided. For example, no mention was made about the improved tennis courts, are they getting lights are they getting any stadium seating. How was the determination made about the seating capacity for the new football stadium. Where is the press box going to be placed and at what level of audio are the games going to be announced at. What other events are being planned for the stadium. All easy information to be provided and yet none was. Very disappointing!!!

It is a cop out just to say these decision aren't finalized and will be made later, or that the EIR will address them.

Be professional about this and schedule a real meeting giving complete information.

Please acknowledge that you have received this letter and read it, and what action you intended to take.

Dale Vaira

Dale Vaira dalev1616@aol.com
719 Whitehall Way
Sacramento, Ca. 95864

Considerations for Rio Americano Stadium EIR

The EIR needs to consider the cumulative impact on the Parkway wild life, vegetation and its private property owner neighbors.

Parking The new stadium will have a capacity of 2,500 seating plus players, coaches, cheer leaders etc. The school has less that 500 parking spaces, What about graduation parking for parents, other family members and friends. Don't forget Jesuit has identified Rio Parking lot as their overflow. You can see the cumulative negative effect of 2 stadiums within 3 blocks of each other on parking.
levee
Game Time traffic These intersections Saverien and American River Drive and Saverien and Fair Oaks Blvd are not designed for this type of heavy traffic. These intersections can barely handle the morning drop off and afternoon pick up from these 2 high schools now. Who is going to pay to fix the roads when they are damaged from this increased traffic. The roads are in bad condition now.

Security What type of security is planned to prevent a shooter from coming into the different events that are planned. What type of security is planned to stop a person from smuggling a bomb into these events. What about an attack that might come over the parkway levee.

Trespassing lighting This is unwanted artificial light spilling over the parkway effecting wild life and backyards of private property owner neighbors. This trespass lighting causes disruption of life, privacy and enjoyment. Whats the plan to prevent this.

Noise What is the plan to keep the noise at a low level to not negatively effect the parkway wild life and private property owner neighborhoods. Don't forget the neighborhood across the river, the sound will travel over there as well.

Cell Tower Disruption These cell towers emit RF waves 24/7/365 days a year. These RF radio frequency energy waves are a form of electromagnetic radiation. The Parkway Wildlife, vegetation as well as the private property owner neighbors need to know at what level the RF emission waves will be emitted at and how far they will extend.

This is a list of just a few cities and school districts that have not approved or removed cell towers. Ripon CA elementary school remove their cell tower after 4 students and 3 teachers were diagnosed with different forms of cancer. Cal fire fighters union have successfully gotten a Calif law passed that removes all fire stations from 5G cell tower list considerations. City of La Jolla Calif is not allowed to place cell towers near bike paths, private homes, senior care facility's, parks, preschools. Due to possible human health concerns.

Long Beach Calif. A couple prevented through a lawsuit a cell tower being placed on public property next to their home. The court found that the FCC determination as to what is safe and acceptable RF emission exposure levels are antiquated and not based on current scientific evidence. Both Dewey Beach, Delaware and Ocean city, Maryland have denied cell tower installations. A proposal for a cell tower on the camps of St John's college in New Mexico was rejected.

What about on going maintenance of this tower. When are these big tall bucket trucks going to be allowed on campus.
What about when this cell tower becomes obsolete. Who is going to remove it, We are just a few short years away from satellite phones which will make all cell towers obsolete.

It is a cop out to just say the EIR will address theses cumulative issues. The school distinct needs to provide answers now, on how they are going to address these cumulative issues. What studies do they plan on doing and who is going to do them.

I expect you to send me acknowledgment that you have received and read my letter and what action you intent to take.

Dale Vaira Dalev1616@aol.com
719 Whitehall Way
Sacramento, CA 95864

Draft EIR Appendix E, "Local Transportation Analysis," page 16-20, the last row of Table 17, is hereby revised as follows:

Segment ID	Segment Length (ft)	Estimated Parking Available
Remaining Parking ~~Surplus~~Deficit (Off-Site Parking - On-Site Parking Deficit)		-296

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4 REFERENCES

Jones, M.; Durrant, J.; Michaelides, E.; Green, M. 2015. Melatonin: a possible link between the presence of artificial light at night and reductions in biological fitness. Philosophical Transactions of the Royal Society B: Biological Sciences; 370(1667):20140122. doi: 10.1098/rstb.2014.0122

Longcore, T. 2023. Effects of LED Lighting on Terrestrial Wildlife. March 2023. DOI: 10.13140/RG.2.2.18664.38406

Longcore, et al. 2023. A compendium of photopigment peak sensitivities and visual spectral response curves of terrestrial wildlife to guide design of outdoor nighttime lighting. Basic and Applied Ecology, Volume 73, pp. 40-50; doi: 10.1016/j.baae.2023.09.002.

Rich, C.; Longcore, T., 2006. Ecological Consequences of Artificial Night Lighting. *The Condor: Ornithological Applications*, Volume 109, Issue 1, 1 February 2007, Pages 226–227, https://doi.org/10.1093/condor/109.1.226.

Russart, K. and Nelson, R. 2018. J Exp Zool A Ecol Integr Physiol. 2018 October ; 329(8-9): 401–408. doi:10.1002/jez.2173 .

Sacramento County. 2008. *American River Parkway Plan.* Available: https://regionalparks.saccounty.gov/us/en/parks/american-river-parkway/parkway-planning.html. Accessed October 28, 2026.

Shannon, G.; McKenna, M; Angeloni, L,; Crooks, K.; Fristrup, K.; Brown, E.; Warner, K.; Nelson, M.; White, C.; Briggs, J.; McFarland, S.; and Wittenmyer, G. (2016). A synthesis of two decades of research documenting the effects of noise on wildlife. Biological Reviews 91, pp. 982–1005. 982 doi: 10.1111/brv.12207. Available at: https://angelonilab.colostate.edu/Site/Publications_files/ShannonEtal2016BiolRev.pdf

USFWS. 2017. Framework for Assessing Impacts to the Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*). U.S. Fish and Wildlife Service; Sacramento, CA. May.

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ATTACHMENT A

Comments on the Draft Environmental Impact Report

COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT

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Letter A1

From:	Spence, Robynn L@DOT on behalf of D3 Local Development@DOT
To:	Rio Americano; state.clearinghouse@opr.ca.gov
Cc:	Smith, David@DOT
Subject:	Caltrans District 3 LDR Response: Rio Americano High School Stadium Improvements Project/SCH#2026010094
Date:	Tuesday, September 8, 2026 1:53:30 PM

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Report Suspicious

Good morning,

Thank you for including the California Department of Transportation in the review process for the Rio Americano High School Stadium Improvements Project/SCH# 2026010094. We wanted to reach out and let you know that we have no comments at this time.

A1-1

Please provide our office with copies of any further actions regarding this proposal. We would appreciate the opportunity to review and comment on any changes related to this development.

Should you have questions please contact me, Local Development Review Coordinator, by phone (530) 812-6874 or via email at D3.local.development@dot.ca.gov.

Thank you.

Respectfully,

Robynn Spence
Local Development Review
Division of Planning, Local Assistance, and Sustainability
California Department of Transportation, District 3
(530) 812-6874
Schedule: M-F, 7am-3:30pm
In Office: M-Th | Telework: F

Letter A2

From:	Gasperi. Gary
To:	Rio Americano
Subject:	SacDOT Comments for Rio Americano High School Improvements Project Draft Environmental Impact
Date:	Thursday, October 15, 2026 10:03:36 AM
Attachments:	image001.png SacDOT Comment Letter Rio Americano HD Stadium.pdf

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Report Suspicious

Good morning Nicholas Arps,

Please see attached comments from Sacramento County Department of Transportation.

A2-1

Sincerely,

Gary Gasperi, PE, TE

Senior Civil Engineer, Planning and Programs Division

Sacramento County Department of Transportation

4111 Branch Center Road | Sacramento, CA 95827

Office (916) 876-4108 | gasperig@saccounty.gov

SACRAMENTO COUNTY

Department of Transportation
Ron Vicari
Director

Office of the County Executive
David Villanueva
County Executive
Community Services Agency
David Defanti
Deputy County Executive

County of Sacramento

October 14, 2026

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 9560

SUBJECT: COMMENTS ON RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT APPENDIX E – LOCAL TRANSPORTATION ANALYSIS

Nicholas Arps:

The Sacramento County Department of Transportation (SacDOT) has reviewed the Rio Americano High School Improvements Project Draft Environmental Impact Report (August 2026) focusing on Appendix E's Local Transportation Analysis (LTA). A2-2

Below is a summary of our comments regarding the project's LTA:

1. Improvement I1 – SacDOT agrees that the school should implement a traffic management program to reduce anticipated traffic congestion and limit disturbances to the adjacent residents. The study shows level of service (LOS) F operations and lengthy queuing on southbound Saverien Drive. Specifically, the queues are anticipated to be 13, 17, and 41 vehicles under Project, Jesuit Game, and Conservative Event conditions. We would ask that traffic management and control be implemented before and after games to include at a minimum the following at the American River Drive/Saverien Drive intersection: A2-3
    a. Crossing guards
    b. Law enforcement to direct traffic during a "Conservative Event"
2. Improvement I2 – SacDOT concurs with the recommendation to modify the median on Fair Oaks Boulevard to increase storage for the westbound left turn movement, to prevent spillbacks from blocking the through lanes. A2-4
3. The LTA should discuss operations during regular school dropoff/pickups and note any existing deficiencies, if observed. SacDOT records indicate a history of concerns at the American River Drive/Saverien Drive intersection regarding long vehicle queues and delays resulting from high pedestrian crossing. A2-5

We look forward to coordinating this project between San Juan Unified School District and the Sacramento County Department of Transportation. If you have any questions or comments, please feel free to reach out to me at gasperig@saccounty.gov

A2-6

Sincerely,

Gary Gasperi

Digitally signed by Gary Gasperi
Date: 2026.10.14 13:01:44-07'00'

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

GG

CC:
Matthew Darrow, DOT
Cameron Shew, DOT
Amanda Meroux, DOT
Destiny Lor, DOT
Lu Li, DOT

Letter A3

Todd Smith, Planning Director
Planning and Environmental Review

Troy Givans, Director
Department of Community Development

County of Sacramento

October 16, 2026

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

Subject: Rio Americano High School Stadium Improvements Project

Dear Nicholas Arps,

Thank you for providing an opportunity to comment on the Environmental Impact Report for the Rio Americano High School Stadium Improvements Project.

On June 4, 2024, the Sacramento County Board of Supervisors voted unanimously (5 Yes – 0 No) to deny an appeal and uphold the Planning Commission's approval of the Jesuit High School Stadium Lighting Project. As part of their decision the Board added a condition of approval (Condition 25), which is as follows:

AS AN ONGOING MEASURE: If at some point Rio Americano High School pursues and is entitled to have stadium lights, Jesuit High School shall coordinate with Rio Americano High School to ensure nighttime athletic events are scheduled in a manner to minimize impacts to the surrounding community.

The intent of this comment letter is to inform you of this condition of approval and to further recommend Rio Americano High School coordinate closely with Jesuit High School to minimize impacts to the surrounding community.

Thank you again for the opportunity to comment, should you wish to discuss further please contact me at gutierrezk@saccounty.gov or at (916)874-7529.

Kimber Gutierrez

Kimber Gutierrez
Principal Planner
Planning and Environmental Review

Letter O1

October 15, 2026

Nicholas Arps
Director of Facilities Construction & Modernization
San Juan Unified School District
3728 Walnut Ave,
Carmichael, CA 95608

Re: Comments on the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report

Dear Mr. Arps:

American River Trees (ART) is a California unincorporated association whose members include engineers, scientists, and other professionals, who recreate in the portion of the American River impacted by the Project. ART's members routinely visit the American River and its riparian forests for hiking, swimming, birding, fishing, and photography, and other recreational, scientific, and educational activities. O1-1

Since December 2023, ART has been challenging the Army Corps of Engineers to implement less destructive alternatives to address erosion issues on the American River Parkway in the area from Howe Ave. east to Rio Americano High School. If constructed as planned, this erosion control work, commonly referred to as Contract 3B, threatens to remove about 700 trees and miles of habitat in the American River Parkway. This is in addition to earlier work from Howe Ave downstream toward the Business 80 crossing, referred to as Contract 2, which already has removed a substantial amount of viable habitat from the wildlife corridor. The American River, from its confluence with the Sacramento River to Nimbus Dam is a federal and state designated Wild and Scenic river. O1-2

The Rio Americano High School Stadium Improvements Project will further exacerbate the pressure and impacts being imposed on the precious wildlife of the area. As such, the Army Corps American River Common Features Project (Contracts 2 and 3B) must be addressed in the Final EIR as a cumulative project. O1-3

The DEIR's biological resources impact assessment relies in part on the qualitative assumption that "dispersing or foraging individuals of protected wildlife species are mobile and would be expected to move to avoid disturbance" and that "ample suitable foraging, roosting, and nesting habitat exists located in the surrounding neighborhoods and within riparian habitat to the south along the

American River." However, Contract 3B has the potential to drastically change the availability of "ample suitable habitat," on both the south and north sides of the river. This must be considered in conjunction with the impacts of increased noise, light, vibration, and human activity that the Stadium Project will impose. These cumulative impacts must be assessed in combination, not just in separate analyses.

O1-3 (Cont.)

The DEIR sorely lacks a science-led approach in its wildlife impact assessment, relying heavily on generalized, qualitative assumptions, such as those quoted above. Specific scientific research must back all wildlife impact significance conclusions in the FEIR. Identification of increased light, noise, vibration, and human activity tolerance thresholds for different exposed species should be included in the analysis. Furthermore, if wildlife is expected to relocate as a result of operational noise, this causes a direct impact on movement in the corridor, which must be addressed as such in the FEIR.

O1-4

ART is concerned about the deficiencies of the DEIR's noise impact analysis, particularly as it pertains to biological resources and Parkway recreational impacts. Ambient noise levels at the Parkway during the evening are not measured, therefore, an appropriate comparison of existing conditions versus the predicted evening game-time noise levels cannot be made. Furthermore, the DEIR relies heavily on the notion that "the Parkway is closed to public use after dark" and "...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..." However, according to the school's 2025-26 varsity football schedule, games start as early as 7:00pm. Not only is this time before dusk as it is, but there are expected to be sources of noise prior to kick-off, such as, large volumes of attendees arriving/gathering, band warm-ups, PA announcements, equipment testing, etc. These pre-dusk activities are not mentioned or analyzed for impacts in the DEIR.

Unlike the Army Corps Contract 2 and 3B projects that address flood protection for the greater Sacramento area, the Stadium Project is non-essential. Stating that impacts are significant but unavoidable is unacceptable, especially when the project itself is avoidable. The Board should consider these significant impacts as reasoning for not approving the project. Rio Americano can continue to play games at El Camino High School. Preserving the American River Parkway, Sacramento's Crown Jewel, which receives more annual visits than Yosemite, should take priority over convenience.

O1-5

Sincerely,

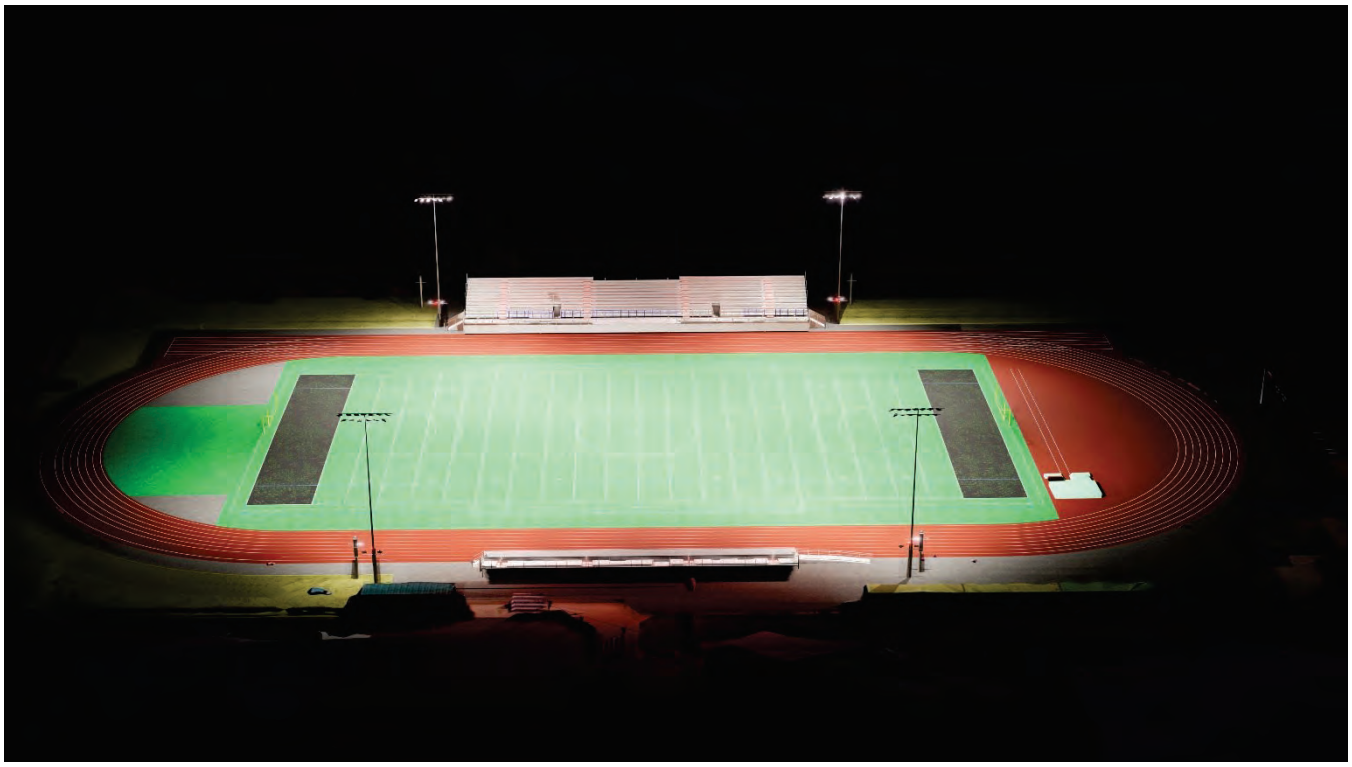
Peter Spaulding, on behalf of American River Trees (ART)

Cc: San Juan Unified School District Board Members

Tanya Kravchuk, President	Manuel Perez, Vice President
Nick Bloise, Clerk	Zima Creason, Member
Pam Costa, Member	Ben Avey, Member

Rio Americano High School Stadium Improvements Project
Draft Environmental Impact Report

SCH Number: 2026010094



August 2026

Rio Americano High School Stadium Improvements Project
Draft Environmental Impact Report
SCH Number: 2026010094

Prepared for:

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

Contact:
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August 2026

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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. O2-1
- **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

Comment O2-1: It borders a designated Wild and Scenic River. Could the American River Parkway lose its status as a Wild and Scenic River from this project? Currently no light spills into the parkway, but this project likely changes that. (Wolf, Oct. 16, 2026)

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. O2-2 O2-3

- **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.

O2-2

Comment O2-2: The area described sounds more like LZ1, not LZ2. The Rio area doesn't have hospitals, hotels, or motels. LZ1 specifically has single- and two-family residences. Not even sure it has other areas like business parks, but the areas "typically with limited nighttime activity." It definitely also includes developed areas in parks and other natural settings. (Wolf, Oct. 16, 2026)

Comment O2-3: Lighting is expected to be non-continuous--does that contradict the plan to light up the whole track path or the parking pass or whatever the lighting people are lighting up on the edge of the stadium? Could those have motion sensor lights? (Wolf, Oct. 2, 2026)

- **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. O2-4

- **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) O2-5
- **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. O2-6 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, O2-7 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. O2-8 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, O2-9 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

Comment O2-4: Highlighted text (Wolf, 12:43 pm)

Comment O2-5: Highlighted text (Wolf, Oct. 2, 2026)

Comment O2-6: Seems incorrect. Project site falls within Lighting Zone LZ1, not LZ2. (Wolf, Oct. 2, 2026)

Comment O2-7: I do not think it is adjacent residential neighborhoods and roadways that produce the visible skyglow, I think the larger area's overwhelming light together with those spaces is producing skyglow. An important distinction. Star visibility dies a death not of a hundred cuts, but by a hundred lights. Let's not add to that with a sports stadium that ignores that reality on three of its four sides. (Wolf, Oct. 2, 2026)

Comment O2-8: It is entirely insufficient to expect tree canopy to limit light trespass, especially in light of the US Army Corps of Engineers systematically removing trees in the area mile by mile. If the only thing stopping light trespass is a tree (or a levy setback), that means the light fixture itself is not dark-sky compliant. (Wolf, Oct. 2, 2026)

Comment O2-9: Okay, this I agree with. (Wolf, Oct. 9, 2026)

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 footcandle[3]) 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

O2-10

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.

Comment O2-10: The problem here is that most of this lighting will be during the winter, when sunset is around: October 6:26 PM, November: 4:53 PM, December: 4:47 PM, January: 5:10 PM, February: 5:42 PM, March: 7:00 PM

For wildlife mitigation, turning lights off within two hours (at most) after sunset is advisable. Wolf, Oct. 16, 2026)

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). I O2-11

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).

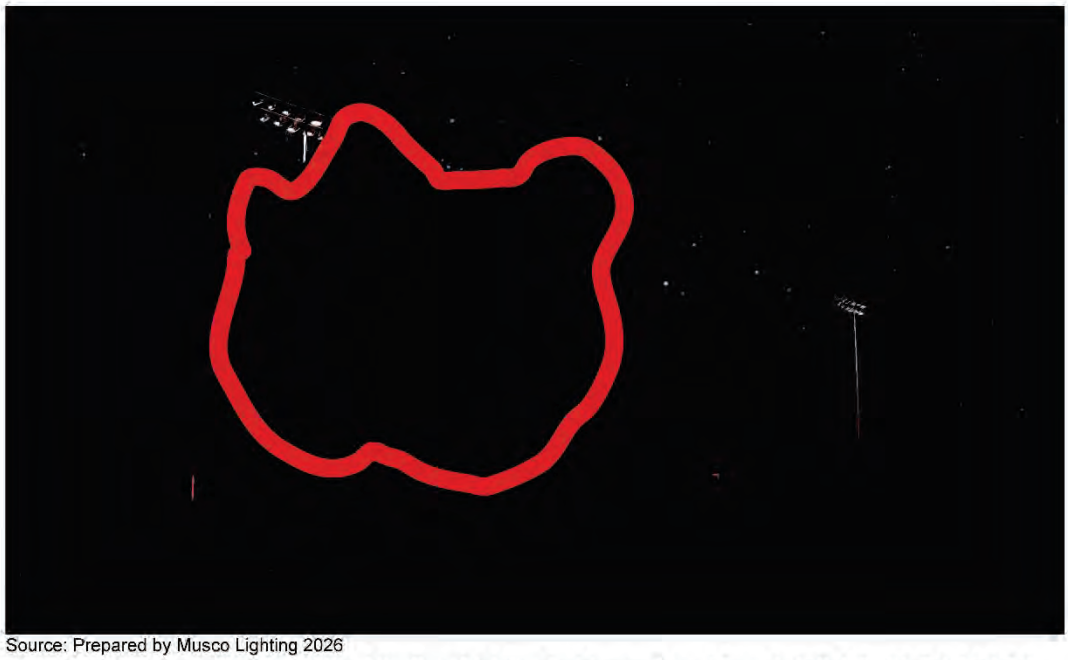


Source: Prepared by Musco Lighting 2026

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."

Comment O2-11: Okay, 5-8 football games + 40 other games + 88 days of practice = 133 or 136 days a year, which is more than a third of the year, and particularly during winter when the sun sets earlier, which is deleterious to wildlife. (Wolf, Oct. 2, 2026)



Source: Prepared by Musco Lighting 2026

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

O2-12

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

Comment O2-12:

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 highs 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.

O2--13
O2-14
O2-15
O2-16
O2-17

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.**

O2-18
O2-19

Comment O2-13: Added a drawing (Wolf, Oct. 2, 2026)

Comment O2-14: Somewhat misleading. Earlier this report says IDA had not reviewed the project, yes? The writer here is saying that a BUG analysis was performed for the proposed lighting system; however, the lighting plan reviewed by IDA was for an existing system.

Also, it should really indicate the actual "similar" project. Similar in what ways? Is it next to a designated Wild and Scenic waterway? (Wolf, Oct. 2, 2026)

Comment O2-15: Added a drawing (Wolf, Oct. 2, 2026)

Comment O2-16: What are we comparing to what here? Are we just comparing "not all the lights on" to "all the lights on" and saying that's "low"? That's disingenuous at best and isn't accurately comparing the effect of the project on the surrounding area. This sort of wording makes it hard to determine what the results of the project will be and thus limits the ability to comment on it. (Wolf, Oct. 16, 2026)

Comment O2-17: Run on. Someone copy pasted or rushed this part. (Wolf, Oct. 2, 2026)

Comment O2-18: Not strong enough. (Wolf, Oct. 2, 2026)

Comment O2-19: Again, this report is arguing three of the sides are LZ2, but I would argue it should be for LZ1. (Wolf, Oct. 2, 2026)

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. O2-20

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**.

Comment O2-20: Well, at least that's something. (Wolf, Oct. 2, 2026)

Electric Power Research Institute suggests a recommended maximum illuminance level of 1 lux (0.1 footcandle[2]) 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. O2-21

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."

Comment O2-21: Wait, was it submitted or not? Contradictory. (Wolf, Oct. 2, 2026)

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.

O2-22

O2-23

Comment O2-22: Would it be possible to just not use this? (Wolf, Oct. 2, 2026)

Comment O2-23: Sad. This area is in the Pacific Flyway, which has massive amounts of birds migrating through it. This report seems to gloss over the fact that the effects described here don't just result in birds' foraging opportunities, but results in their deaths as they get lost and starve to death. (Wolf, Oct. 16, 2026)

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.

O2-24

O2-25

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

Comment O2-24: How many feet away is it? (Wolf, Oct. 2, 2026)

Comment O2-25: This literally contradicts the earlier highlight. (Wolf, Oct. 2, 2026)

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. O2-26

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.

Comment O2-26: You could argue low impact, but you can't say none. There is literally light pointed up from the ball tracker. (Wolf, Oct. 2, 2026)

Letter O3

From:	Brenda Gustin
To:	Rio Americano
Cc:	nicholas.arps@sanjuan.edu; mbassanelli@sanjuan.edu; fhanysha.gaddis@sanjuan.edu; legalservices@sanjuan.edu; info@sanjuan.edu; pcosta@sanjuan.edu; zima.creason@sanjuan.edu; nick.bloise@sanjuan.edu; tanya.kravchuk@sanjuan.edu; ben.avey@sanjuan.edu; manuel.perez@sanjuan.edu; boardmembers@sanjuan.edu
Subject:	Comment on DEIR for Rio American High School Stadium Improvements Project
Date:	Friday, October 16, 2026 2:43:24 PM
Attachments:	DEIR Public Comment 10.15.26 Brenda Gustin.docx

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Please confirm via email that my formal comment regarding the Rio Americano High School Stadium Improvements Project - Draft Environmental Impact Report (DEIR) has been received. Thank you.

O3-1

Dear Mr. Arps,
Please see the attached comment regarding the Rio Americano High School Stadium DEIR from Preserve the American River.

Sincerely,
Brenda Gustin
Brenda Gustin, Native of Sacramento
Steering Committee Volunteer
Preserve the American River



October 15, 2026

Nicholas Arps
Director of Facilities Construction & Modernization
San Juan Unified School District
3728 Walnut Ave,
Carmichael, CA 95608

Re: Comments on the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report

Dear Mr. Arps

Please accept this as my formal comment representing Preserve the American River regarding the Rio Americano High School Stadium Improvements Project – Draft Environmental Impact Report. Please confirm via email receipt of this comment. O3-1 (Cont.)

On February 4, 2026, the Sacramento Regional County Parks Director, Liz Bellas, commented regarding the proposed stadium improvements. I wholeheartedly agree with Ms. Bellas. O3-2

The Lower American River is a federally and state-designated Wild & Scenic River. Regional Parks is designated to protect the Outstanding Remarkable Values (ORV) of the river and the adjacent Parkway, and to manage the Parkway abiding by the rules established in the American River Parkway Plan adopted most recently by the California legislature in 2009 (AB-889, Jones, D-Sacramento). [1] O3-3

From the edge of the school's football stadium/track fence line to the actual paved American River Bike Trail is roughly **180 feet**. According to The California Wild & Scenic Rivers Act,[2] "The 2006/2008 American River Parkway Plan confirmed the 1977 Resources Agency understanding that the Plan was both a plan for the Parkway and the state wild & scenic river management plan; for the latter's purposes, ***defining the wild and scenic river corridor boundaries [emphasis added]*** (the American River Parkway) and extraordinary values." These Outstanding Remarkable Values must be protected. It is not an option. It is both federally and state mandated. The Wild & Scenic Rivers Act protects the wildlife corridor ¼ mile from the river's edge. The stadium is roughly 615 feet from river's edge. Therefore, this area requires protection and preservation of the habitat identified in the biological survey and noted in O3-4

[1] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200920100AB889&utm

[2] *The California Wild & Scenic Rivers Act and other CA wild & scenic rivers Page 66* https://www.fws.gov/rivers/river/american

Waterbird Habitat Project Founder, Dr. Andrea Willey's public comment written from her experienced studies of the area. O3-4 (Cont.)

Additionally, the DEIR potentially incorrectly identifies the levee as not part of the Parkway. It based its lighting analysis on this assumption: "Based on land use, ecological sensitivity, and existing nighttime brightness, for the purpose of this EIR, the segment of the American River Parkway that is south of and separated by the levee from the Rio Americano High School campus is considered to be Lighting Zone LZ-0, based on the Joint IDA-IES classifications." (DEIR, Page 4.1-11) O3-5

Please clarify the parkway boundaries in relation to the proposed project.

Regarding zoning in this area, an event center such as this stadium with the increased capacity to 2,575 would normally have to apply for a rezone. However, in consideration to neighborhood homeowners having purchased in this area with a standard sized high school sports field with bleachers providing 288 seats, the District should consider if it is taking advantage of its public authority to override county zoning. O3-6

Director of County Parks, Liz Bellas stated that "Protection of its core values is governed by the American River Parkway Plan[3] (Parkway Plan), adopted under the Urban American River Parkway Preservation Act (California Public Resources Code Section 5840). She further states: "As currently proposed, the RAHS Stadium Improvements would adversely impact the aesthetic and biological values of the Wild and Scenic Parkway. Specifically, the proposed lighting system and the currently planned cell tower would be highly visible from within the Parkway corridor. The introduction of a powerful new light source, combined with increased noise from expanded stadium capacity, would degrade the Parkway's natural aesthetic. O3-7

Furthermore, both light and noise-compounded by the presence of a cell tower-can severely impact wildlife. Artificial light disrupts circadian rhythms, creates navigational confusion for migratory birds, and alters predator-prey dynamics. The addition of a cell tower introduces further hazards, including increased avian collision risks-particularly for birds already disoriented by stadium lighting-and potential electromagnetic interference with animal navigation.

Simultaneously, increased noise contributes to habitat fragmentation and physiological stress while masking vital wildlife vocalizations used for mating, territorial defense, and predator detection. These cumulative impacts are especially

[3] See *American River Parkway Plan*, County of Sacramento Municipal Services Agency Planning and Community Development Department, Wild & Scenic River section, pp. 87–90 or 88–92 (depending on version). https://acrobat.adobe.com/link/spaces/urn:aaid:sc:US:bbaca5c5-557b-4cff-8cb7-5d08b586520c(2008 Plan).

critical given the project's location adjacent to the Parkway's narrowest reach, where the wildlife corridor bottlenecks for approximately six miles."

County Parks Director, Liz Bellas, recommends instead: "To avoid or significantly reduce these impacts, the Environmental Impact Report (EIR) should evaluate alternatives such as establishing a substantial woodland buffer on the campus boundary and relocating the stadium to the northern portion of the campus adjacent to American River Drive."

O3-7 (Cont.)

Millions of people enjoy our Parkway because of the riparian habitat and the variety of wildlife living there. This is their home. It is important to protect it and remember also that the Parkway creates economic wealth to our city – over $365 million dollars annually.

O3-8

We care about the education of our youth which includes learning how to collaborate, cooperate and care for that which we have been given to steward. Rio Americano High School is in a special place and is even named after the American River. With privilege comes great responsibility to care for the environment upon which it resides. Dr. Anna Doty of the California State University at Sacramento prepared and presented the idea to create a STEAM Program at the San Juan School District meeting highlighting the benefits to the Rio Americano students who have a living laboratory right outside their doors, which many enjoy.

O3-9

The Lower American River has also been selected as a Sentinel Project under the "Sustainable Interdisciplinary Research to Inspire Undergraduate Success (SIRIUS) Project providing interdisciplinary authentic learning experiences (ALEs) to STEM students across 67 courses at five institutions in the Sacramento Region." The Lower American River was chosen since it flows "through the Sacramento State campus" as "an urban, agricultural, rural, riparian habitat that is listed as 'Impaired' by the Federal Clean Water Act of 1972. This is providing the SIRIUS project with an opportunity to create a culture of stewardship and environmental activism around this important natural resource."

O3-10

Increasing light and sound this close to our "Crown Jewel" of Sacramento will require the nocturnal habitat find other places to nest which will drive other species to relocate as well. The problem is, where will they relocate as we continue to eliminate habitat within this wildlife corridor. No mitigation measures have been developed for this project proposal. As stated by other commenters, the habitat near CSUS and Paradise Beach has already been eliminated for flood control with another possible elimination of over 700 trees if the United States Army Corp of Engineers (USACE)Contract 3B is allowed to be executed in its current design. We hope that USACE will adjust the ways and means to provide erosion control. Even so, wildlife riparian habitat will inevitably be destroyed to protect humans.

O3-11

Human beings have built structures too close to the river in the past.

Let's <u>not</u> make more mistakes!

O3-12

Instead, let's take the advice of our County Director of Parks, Liz Bellas, and others.

Let's do better and provide what is needed for all the students at Rio Americano including those interested in Science, Technology, Engineering, Art and Mathematics.

O3-13

Let's redesign a better project in a cooperative, considerate and safe manner that protects the living laboratory of habitat and its wildlife by moving the stadium to the northern portion of the campus and the proposed cell tower off the levee.

O3-14

Let's create a project that improves the lives of our young people by scaling the project to respect its neighbors who support the school's success.

Let's exemplify to our youth that respect for all life, all our neighbors, includes the birds, reptiles, fish, animals, insects, flora, trees and fauna is an admirable endeavor and a wonderful way to speak up for those who have no voice in the meeting room – our wildlife!

Sincerely,

Brenda Gustin, Ph.D.
Preserve the American River
Steering Committee

Cc: San Juan Unified School District Board Members
Tanya Kravchuk, President
Manuel Perez, Vice president
Nick Bloise, Clerk
Zima Creason, Member
Pam Costa, Member
Ben Avey, Member

Letter O4

From:	Jason Holder
To:	Rio Americano; nicholas.arps@sanjuan.edu
Cc:	bellase@saccounty.gov; sacplan@saccounty.gov; richdesmond@saccounty.gov; Sara Stephens; riocommunityinfo@gmail.com
Subject:	RACA Comments on the Rio Americano High School Stadium Improvements Project Draft EIR (SCH No. 2026010094)
Date:	Friday, October 16, 2026 10:58:06 PM
Attachments:	Lettter OBO RACA re RAHS Stadium DEIR 101626.pdf Exh A - Eagle Site Report 090426.pdf Exh C - Watry Report re Rio Americano Noise Analysis 101526.pdf Exh B - Smallwood comments_Rio Americano HS Stadium_101226.pdf Exh D - Johnson Report re Rio Americano Traffic Analysis 101626.pdf Exh E - Index of Source Documents and Supporting Materials (Heinz) Final 2026-10-16.pdf Exh F - RAHS Athletic Facilities Chronology 101626.pdf Exh G - Matrix DEIR Analyses Keyed to NOP Comments 101126.pdf Exh H - Table Summary of Differences 2010 EIR and 2026 DEIR Analyses.pdf Exh I - Terracon CEQA Exemption Cell Tower Memo.pdf Exh J - Resolution No 2521.pdf

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Report Suspicious

Dear Mr. Arps:

On behalf of the Rio Americano Community Alliance (RACA), we submit the attached comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH No. 2026010094), submitted within the public review period ending today, October 16, 2026. Due to the size of the submission, the comment letter and exhibits are being submitted via email only, please confirm receipt. O4-1

The letter explains that the DEIR does not define an enforceable operating program for a lighted stadium hosting evening events of up to approximately 3,500 people next to established residences and the American River Parkway. It also does not reconcile the Project with the District's 2010 EIR and its mitigation commitments, identify the required County approvals, or directly determine consistency with the Parkway Plan. The letter further shows that the DEIR understates the Project's lighting, noise, biological, traffic and parking effects, and that it neither adopts enforceable mitigation nor evaluates reasonable alternatives capable of reducing the Project's significant effects. RACA asks the District to revise and recirculate the affected portions of the DEIR before the Board considers certification or Project approval. O4-2

The following exhibits are attached to and incorporated in RACA's comments: O4-3

- **Exhibit A:** Eagle Sight Drone Intelligence Group, Field Observation Report: Nighttime Light-Spillage & Event Activity Documentation, Jesuit High School/American River Drive Study Area (observations of Sept. 4, 2026), with media package (aerial photographs, video, and DJI telemetry files)
- **Exhibit B:** K. Shawn Smallwood, Ph.D., Biological Resources Assessment and Review of the Rio Americano High School Stadium Improvements Project Draft EIR (Oct. 11, 2026), with curriculum vitae
- **Exhibit C:** Derek L. Watry, M.S., M.B.A., Wilson Ihrig/RWDI, Review of Noise Analysis in Rio Americano High School Stadium Improvements Project Draft EIR (Oct. 15, 2026), with product data sheets and résumé

- **Exhibit D:** Grant Johnson, TE, Prism Engineering, Traffic Engineering Services in Relation to a Review of Stadium Improvements at Rio Americano High School (Oct. 16, 2026)
- **Exhibit E:** Candice Heinz, Environmental Scientist, Index of Field Data, Source Documents, Photographs, and Supporting Materials (Oct. 16, 2026)
- **Exhibit F:** Rio Americano High School Athletic Facilities: Chronology of Improvements and Environmental Review, 2005–2026 (revised Oct. 2026)
- **Exhibit G:** Matrix of Draft EIR Analyses Keyed to RACA's NOP Comments
- **Exhibit H:** Summary Comparison Between the 2010 and 2026 Environmental Reviews
- **Exhibit I:** Terracon Consultants, Inc., CEQA Notice of Exemption and Categorical Exemption Memorandum (Oct. 29, 2025)
- **Exhibit J:** San Juan Unified School District Resolution No. 2521 (Apr. 27, 2010)

O4-3 (Cont.)

[Because of their size, the Exhibit A media files will be made available for download and will also be provided on a USB drive.]

Please include the letter, the exhibits and all materials they cite in the administrative record, and respond to each comment in the Final EIR.

Under Public Resources Code sections 21092.2 and 21167(f), we also request written notice of the Final EIR, any hearing on the Project, and any Notice of Determination, sent to me and to RACA at riocommunityinfo@gmail.com.

O4-4

Sincerely,

Jason Holder
Holder Law Group
Counsel for Rio Americano Community Alliance

--
Jason W. Holder
Holder Law Group

Important: This electronic mail message, including any attached files, is being sent by or on behalf of a lawyer; it is confidential and it may contain or constitute information protected by the attorney-client and/or the attorney work-product privileges. If the person actually receiving this message, or any other reader of this message, is not the named recipient, or the employee or agent responsible to deliver it to the named recipient, you are not authorized to retain, read, copy or disseminate this communication or any part of it. If you have received this communication in error, please immediately notify Holder Law Group at (510) 338-3759. Thank you

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October 16, 2026

VIA EMAIL ONLY (PLEASE CONFIRM RECEIPT)

Nicholas Arps
Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, California 95608
E-mail: RioEIRComments@aecom.com
nicholas.arps@sanjuan.edu

Re: **Comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH No. 2026010094)**

Dear Mr. Arps:

On behalf of Rio Americano Community Alliance ("RACA"), we submit these comments on the Draft Environmental Impact Report ("DEIR") prepared by the San Juan Unified School District ("District") for the proposed Rio Americano High School Stadium Improvements Project ("Project"). RACA appreciates the opportunity to comment and asks the District to address each issue raised below in the Final EIR. O4-5

RACA supports reasonable improvements that serve Rio Americano students. The DEIR nevertheless must evaluate the Project that would actually be authorized: a substantially larger stadium operating into nighttime hours, with permanent lighting, amplified sound, and events attracting as many as approximately 3,500 people next to established residences and the American River Parkway. As discussed below, the DEIR does not define a stable operating envelope, reconcile the Project with the District's 2010 environmental review and mitigation commitments, adequately analyze adjacent Parkway habitat, or identify enforceable measures and reasonable alternatives capable of reducing acknowledged significant effects. O4-6

RACA retained qualified experts to evaluate the DEIR's technical analyses and document existing conditions at and near the Project site. RACA submits the following reports and supporting materials with these comments: O4-7

O4-7 (Cont.)

1. a field observation report, aerial photographs, and drone video prepared by Eagle Sight Drone Intelligence Group documenting nighttime lighting, parking, and traffic conditions during a September 4, 2026 evening football game at Jesuit High School, whose stadium lighting the DEIR relies on as the model for the Project's lighting (Exhibit A, the "Eagle Sight Report");

2. a biological-resources assessment prepared by Dr. K. Shawn Smallwood, based on five daytime, evening, and nighttime field surveys between February and September 2026 of the campus and the adjoining American River Parkway, including acoustic bat surveys, together with a review of the DEIR's biological-resources analysis and its bat survey memorandum (Exhibit B, the "Smallwood Report");[1]

3. a review of the DEIR's noise analysis prepared by Derek Watry, M.S., M.B.A., Technical Director at Wilson Ihrig/RWDI, evaluating the El Camino High School reference measurements and Appendix D data, the DEIR's point-source screening method, the County standards the DEIR adopts, noise sources the DEIR omits, and Mitigation Measure 4.3-1b (Exhibit C, the "Watry Report");

4. a transportation and parking report prepared by traffic engineer Grant Johnson of Prism Engineering, based in part on his drone counts of school-day traffic and parking at Rio Americano, evaluating event attendance and trip generation, the assignment of event traffic to the campus parking lots, on-street parking and bicycle-lane conflicts, the intersection analysis, and the DEIR's vehicle-miles-traveled analysis (Exhibit D, the "Johnson Report"); and

5. an indexed compilation prepared by environmental scientist Candice Heinz containing the source documents, field data, photographs, correspondence, and other materials supporting RACA's comments and its experts' analyses (Exhibit E, the "Heinz Report").

These reports and supporting materials are attached to and incorporated into RACA's comments. They provide site-specific evidence, identify deficiencies in the DEIR's methodologies and assumptions, and recommend additional analysis and feasible mitigation. The District must consider this evidence, respond in detail to the significant environmental issues it raises, and include the submitted materials in the administrative record.[2] Please include those submissions and all materials cited in this letter in the administrative record.

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[1] RACA relies on Exhibit B for its analysis of biological resources. RACA does not rely on the report's discussion of the proposed wireless communications tower (Exh. B, pp. 55–57), including its discussion of radiofrequency emissions. Dr. Smallwood's view that Alternative 2 would be environmentally superior (id., pp. 3, 62) rests on biological resources; RACA's comments on the alternatives appear in Section III.J.

[2] *See* 14 Cal.Code.Regs. ("CEQA Guidelines"), § 15088, subds. (a), (c).

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I. INTRODUCTION

A. The Project and Its Operating Program

The DEIR describes the Project as improvements to an existing high-school "stadium." For CEQA purposes, however, the Project includes both the proposed construction and the operating program those improvements would enable. The current sports field for the Rio Americano high school has approximately 288 fixed seats and uses portable diesel-powered lights for some evening activities; varsity home football games and graduation are held off campus. The Project would replace the existing bleachers with seating for approximately 2,575 people, install four permanent 80-foot stadium-light standards (including two ball-tracker technology systems on each stadium-light standard) and six 15-foot pedestrian-light poles, add an elevated press box, install a permanent public-address system, and remove existing storage sheds and utility light poles.[3]

Those physical changes would materially expand the existing sports field's capacity, hours, and uses. The DEIR anticipates five to eight varsity home football games with as many as 3,400 total attendees; a graduation ceremony with approximately 3,500 attendees; up to four assemblies or other school-sanctioned community events with 1,500 to 3,000 attendees; field days; and evening athletic games and practices. It estimates approximately 40 evening or nighttime events, plus as many as 88 practice days that could include some evening illumination. Practice lighting would generally end by 8:00 p.m.; football activities could continue until as late as 11:00 p.m.; and reduced lighting could remain on for approximately 30 additional minutes for egress and cleanup.[4]

O4-9

The DEIR does not convert many of those assumptions into enforceable limits. It repeatedly uses qualifiers such as "generally," "typically," "estimated," and "on average"; does not establish a single limit on total attendance, including participants, staff, performers, and persons outside the bleachers; and does not clearly cap the number of illuminated evenings, non-athletic or community events, amplified-sound use, event extensions, or post-event activity. Different resource analyses consequently rely on different subsets or characterizations of the anticipated operating program.

O4-10

District representatives told the public that the stadium could be offered to other schools for revenue and used for community events.[5] Indeed, one of the Project's stated objectives is to "[e]xpand the capability of Rio Americano High School to host athletic and non-

O4-11

[3] DEIR, pp. 3-1, 3-4–3-6. The DEIR does not describe the extent of site disturbance required for the Project. A January 6, 2026 District email (Exh. E, item 15) states there will be approximately 4,070 s.f. of hardscape and 25 s.f. of softscape removed from the visitor side and 115 s.f. of hardscape and 8,460 s.f. of softscape removed from the home side (this equates to Project totals of 4,185 s.f. of hardscape and 8,485 s.f. of softscape). The DEIR should be revised to describe the extent of disturbance (12,670 square feet of existing site surface) and permanent site alteration.

[4] *See id.*, pp. 3-6–3-9, 4.1-19 – 4.1-20.

[5] *See id.*, pp. 3-6 – 3-7; DEIR App. A, PDF (no printed page numbers), pp. 125 – 130, 136, 156, 165.

athletic events."[6] The Project Description must therefore disclose whether, how often, and under what conditions non-District organizations may use the expanded stadium and public-address system, and the analysis must include that use. O4-11 (Cont.)

The Project description should be revised to establish a single maximum operating envelope, including: attendance; annual events by type; dates and hours; full and reduced lighting; public-address and band use; egress and cleanup; and any permitted exceptions. Those limits should be made enforceable through the Project approvals and mitigation-monitoring program. The Project's effects must be evaluated against that operating envelope, rather than characterized merely as replacement lighting or minor work within an existing campus. O4-12

B. The Project Description Omits Required Approvals O4-13

The DEIR's "Required Approvals" section identifies only certification and approval by the District's Board of Education and design review by the Division of the State Architect.[7] CEQA Guidelines section 15124(d) requires the project description to identify the permits and other approvals required to implement the Project and the agencies expected to use the EIR in deciding whether to issue those approvals.

As explained further below, unless the District has validly rendered the applicable County zoning provisions inapplicable under Government Code section 53094, the required approvals must include Sacramento County review under the RD-4/PC zoning designation and any required conditional use permit, amendment to the existing school conditional use permit, design review, or other land-use entitlement. The DEIR must also identify the County review and approvals required by Government Code section 53097 for on-site grading and improvements affecting drainage or road conditions. If the District intends to adopt a section 53094 resolution, that discretionary, project-specific action and its statutory prerequisites should be disclosed as part of the approval process rather than assumed to have already occurred. The District knows how to take that step: it adopted Resolution No. 2521 for the 2010 sports-facility project (Exhibit J). Any new resolution is a discretionary approval that must be listed under CEQA Guidelines section 15124(d).

The omission is substantive. County PCZ review could require changes to the height, location, design, screening, or operation of proposed structures. Until the District either documents a valid zoning override or identifies and obtains the required County authorizations, the Project Description is incomplete and the DEIR's conclusion that the Project would not conflict with applicable land-use regulations is unsupported.

The NOP identified California Department of Education ("CDE") site approval under Education Code section 17213 as a required approval, but the DEIR omits it without explanation. The Final EIR should state whether CDE approval or Department of Toxic O4-14

[6] DEIR, p. 3-10; *see id.* at p. 6-3.

[7] *Id.*, pp. 2-3–2-4.

Substances Control ("DTSC") review will be sought, whether state school-construction funds will be used, and, if not, why the approval the District itself identified no longer applies.

O4-14 (Cont.)

C. The Current Proposal Follows Two Decades of Campus and Athletic-Facility Improvements

O4-15

The proposed Project is the latest in a series of improvements to Rio Americano's outdoor athletic facilities extending over approximately twenty years.[8] At the request of the American River Sports Association and the school's booster organization, the District began considering a comprehensive set of athletic-facility improvements in 2005. The District initially approved those improvements through a mitigated negative declaration. By December 2008, the District had implemented a substantial portion of the contemplated work, including:

- improvements to the football field and irrigation system;
- portable bleachers with seating;
- a portable public-address system;
- a scoreboard, goal posts, and flagpoles;
- a temporary snack bar and restroom building;
- fencing, sidewalks, and a plaza; and
- improvements to track-and-field facilities.

After the approval was challenged, the Sacramento County Superior Court directed the District to prepare an EIR before proceeding further.[9]

The District circulated that EIR in 2010 and certified it on June 15, 2010. The State Clearinghouse described the project as a series of outdoor sports-facility upgrades that included bleachers; improvements to the track and football, softball, baseball, and soccer fields; construction of restrooms, a snack bar, locker rooms, and a weight room; and installation of a public-address system. The District's Notice of Determination stated that the project would have significant environmental effects, that mitigation measures were made conditions of approval, and that the Board adopted findings and a statement of overriding considerations.

The athletic-facility buildout continued after the 2010 EIR. In December 2017, the District approved categorical exemptions for "renovation and reconfiguration" of athletic facilities at Rio Americano, including replacement of natural turf with artificial turf, resurfacing of the track, construction of a scoreboard, and construction of an approximately 1,300-square-foot restroom and concession building. DSA records document completion of softball fields and dugouts in 2018, a scoreboard in 2019, and a concession/toilet building and ticket booth in

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[8] *See* Exh. F – Rio Americano High School Athletic Facilities: Chronology of Improvements and Environmental Review, 2005–2026, pp. 1–4, and the sources cited therein.

[9] San Juan Unified School District Board of Education, *CEQA Findings and Statement of Overriding Considerations for the Rio Americano High School Outdoor Sports Facility Upgrades Project* (June 2010) ("2010 Findings"), pp. 2, 6–7 [peremptory writ of mandate issued Dec. 29, 2008, in *Friends and Neighbors of Rio v. San Juan Unified School District* (Super. Ct. Sacramento County, No. 06CS00495)].

2021. Other substantial campus improvements during this period included a swimming pool, Performing Arts Center, and renovated Career Technical Education building.

In March 2024, the District evaluated the campus as part of its Facilities Master Plan, and in May 2024 it conducted public outreach specifically concerning proposed stadium improvements. During 2025, the District concurrently advanced the stadium proposal and a 90-foot cell-tower project on the same Parkway-adjacent campus.

This history demonstrates that the current proposal cannot be evaluated as an isolated or ahistorical replacement of existing stadium components. The DEIR must accurately disclose the sequence of approvals, distinguish completed from pending improvements, explain the relationship among the successive athletic-facility projects, and analyze the physical and operational conditions produced by their combined implementation. The current description of the Project's background does not provide this important contextual information.[10]

O4-15 (Cont.)

D. The Parkway and Residential Setting

The campus is zoned RD-4/PC (Low Density Single-Family Residential/Parkway Corridor), is bordered by single-family neighborhoods on three sides, and lies immediately north of the American River Parkway and its Rio Americano subarea. The campus abuts the American River Parkway, which includes the north-bank levee (see Section II.B). The levee separates the stadium from Parkway habitat and the Jedediah Smith Memorial Trail. The DEIR acknowledges that Parkway habitat begins approximately 100 feet from the campus boundary and that the upper portions of the proposed light standards would be visible from the levee and portions of the Parkway.[11] The levee may screen some ground-level structures; it does not eliminate noise, skyglow, visible luminaires, biological disturbance, drainage connections, or the relevance of the adjoining protected land.

O4-16

As the DEIR itself recognizes, the Rio Americano subarea is designated by the Parkway Plan for Limited Recreation.[12] The DEIR describes grassland with scattered oaks, shrubs, and riparian vegetation immediately south of the levee, transitioning toward the river into mixed riparian forest and aquatic habitat. Historical river channels have formed islands, lagoons, and wetland areas that provide habitat for waterfowl and other wildlife. This habitat complex supports foraging, nesting, roosting, breeding, refuge, and movement by resident and migratory birds, bats, mammals, reptiles, and other wildlife.[13] Walking, cycling, and boating visitors experience this diverse habitat from the levee, the Jedediah Smith Memorial Trail, and the American River.

O4-17

[10] *See* DEIR, pp. 3-1 – 3-6.

[11] *See id.* at pp. 4.1-17 – 4.1-20, 4.2-3 – 4.2-9, 4.2-15 – 4.2-17, 4.2-20 – 4.2-21, 4.2-24 – 4.2-25, 7-6, 7-15.

[12] *See id.* at pp. 4.1-9, 4.1-18, 6-6.

[13] *See* Exh. B – Smallwood Report, pp. 4–10 & Table 1 (pp. 27–29).

The Legislature adopted the American River Parkway Plan to coordinate protection and management of the Parkway's land, water, native wildlife, and vegetation. Public Resources Code section 5842 requires applicable state and local agency decisions to be consistent with that Plan. These physical and statutory conditions make the Project's off-site effects central to the environmental analysis. Deficiencies concerning Parkway views, habitat, recreation, and Plan consistency are addressed in Sections III.A, III.B, and III.F below. O4-18

E. RACA's Prior Participation O4-19

RACA's NOP comments identified nighttime lighting, noise, traffic, parking, neighborhood compatibility, biological resources, the Parkway Plan, and the need for meaningful alternatives.[14] The DEIR lists many of those subjects as areas of controversy, but acknowledgment is not a substitute for responsive analysis. The Final EIR must respond in detail to significant environmental issues and must revise the document where the comments expose missing data, inconsistent assumptions, or unsupported conclusions.

Attached as Exhibit G is a response matrix summarizing the DEIR's analyses, keyed to RACA's February 4, 2026 NOP letter. For each prior concern, the matrix identifies where the DEIR addresses it, whether the response is adequate, and what additional evidence should be gathered and evaluated. CEQA Guidelines section 15123, subdivision (b)(2) requires the summary to identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Appendix A shows that the District knew of controversy over: O4-20

- cumulative effects of the cell tower and the Jesuit sports field improvements;
- levee integrity;
- wildfire and evacuation;
- Parkway recreation;
- County zoning and the PC overlay;
- use of the site by outside groups;
- related campus projects (the pool and tennis courts); and
- adequacy of notice.

None of the above areas of known controversy appears in the DEIR's list on page 1-2. The DEIR also states that Appendix A contains a summary of all comments received, but no summary appears there.[15] The Final EIR should correct both omissions.

[14] RACA incorporates by reference its February 4, 2026 comments on the Notice of Preparation, together with the supporting materials identified in those comments. *See* DEIR, Appendix A.

[15] DEIR, p. 1-3.

II. GENERAL COMMENTS

A. The DEIR Must Be Clear, Stable, and Internally Consistent

O4-21

The DEIR must present information in a manner calculated to inform readers who did not participate in its preparation. Here, several conclusions are difficult to reconcile with the document's own data. The lighting discussion, for example, states that modeling demonstrates zero off-site light trespass, while reporting nonzero horizontal and vertical footcandle values at eastern residential property lines. The biological analysis characterizes operational event noise as a minor and infrequent change comparable to existing maximum noise, while the noise section predicts increases of approximately 2 to 15 dBA Leq over the nighttime ambient level at nearby residences and finds the resulting impact significant and unavoidable. The cumulative-noise discussion first states that stadium noise would not combine with other project noise at the same receptors, then concludes that the Project's contribution to a significant cumulative operational-noise impact would be cumulatively considerable and unavoidable.

O4-22

O4-23

O4-24

The DEIR contains other internal contradictions. For example, the vibration analysis states that the Project would include no long-term operational vibration sources, while the noise mitigation addresses "footfall or vibration-related noise" from the new bleachers.[16]

O4-25

These discrepancies between the DEIR's data and its inconsistent and inaccurate descriptions of what these data show are not mere editorial details. They concern the factual predicates for impact conclusions, mitigation, alternatives, and the findings the Board would have to adopt. The District should reconcile each inconsistency in a revised DEIR and provide a single, stable set of assumptions across all resource sections.

O4-26

B. The Project Description, Environmental Baseline, and Setting Must Be Accurate

O4-27

An accurate and finite project description is indispensable because it defines the impacts that must be analyzed and the measures needed to reduce them. "An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR." "Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal's benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the 'no project' alternative) and weigh other alternatives in the balance."[17] Conversely, "[a] curtailed, enigmatic or unstable project description draws a red herring across the path of public input."[18] Courts have accordingly set aside EIRs that describe a project inconsistently or leave its operating limits open.[19]

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[16] DEIR pp. 4.3-26, 4.3-27.

[17] *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192–193; *see* CEQA Guidelines, § 15124.

[18] *Id.* at pp. 197-198.

[19] *See*, *e.g.*, *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 654–656 ["when an EIR contains unstable or shifting descriptions of the project, meaningful public participation is stultified"]; *see*

The DEIR's Project Description does not meet this standard. It states the operating program in qualified terms. Practice lighting would "generally end by 8:00 P.M."; football games would "usually end by or before 10:00 P.M. but no later than 11:00 P.M."; post-event lighting "typically" would remain on for 30 minutes; and events without a set schedule are assumed to occur "once monthly on average."[20] It also describes the same events differently in different places. In the text, graduation would draw about 1,400 people and is "not … anticipated to increase in attendance." Table 3-1 puts graduation attendance at 3,500. The air quality analysis assumes nine peak events a year, while the cumulative analysis describes the peak-attendance event as "annual or biennial."[21] Section III.D (below) identifies at least six different event programs in the DEIR. These are the "conflicting signals" that *San Joaquin Raptor* found fatal. Each changes the noise, traffic, lighting, and biological impacts the DEIR must analyze and the mitigation the District must adopt. And like the "temporary" label in *City of Santee*, limits on what will "generally" or "usually" occur do not bind the District. The EIR must either make the limits on which its analysis depends enforceable or analyze the operations the approval would actually allow.[22] O4-28

The DEIR says there would be "a total of 13 luminaires for the stadium lights and three luminaires for the pedestrian access lights."[23] Musco's report lists 64 fixtures on four 80-foot poles (59.6 kW, about 6.8 million rated lumens, 5,700 K) and the aesthetics section itself uses 64.[24] The transportation section describes six pedestrian poles, not three luminaires.[25] The lighting structures must be accurately and consistently described and analyzed.[26] O4-29

The DEIR should specify the maximum rather than a generalized 'typical' operating condition where the District seeks authority for larger or later events. It should also identify the Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, specific emergency operations plan, and public-address specifications as project components if the analysis assumes they will constrain operations. O4-30

The existing-conditions baseline also requires closer scrutiny. The DEIR relies heavily on the current use of portable diesel-powered lights to characterize existing nighttime light, noise, O4-31

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also Communities for a Better Environment v. City of Richmond (2010) 184 Cal.App.4th 70, 82-89; *see also City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1451–1455.

[20] DEIR, p. 3-7.

[21] *Id.*, pp. 3-8 [graduation draws "approximately 480 graduating students and 920 family and friend attendees" and "would not be anticipated to increase in attendance"], 3-9 [Table 3-1: graduation, 3,500 attendees], 5.2-6, fn. 2 ["9 peak events (4 football games, 4 assemblies, and graduation)"], 7-13 ["annual or biennial peak-attendance event"].

[22] *See City of Santee*, *supra*, 214 Cal.App.3d at pp. 1454–1455; *see* CEQA Guidelines, § 15126.4, subd. (a)(2) [mitigation measures must be fully enforceable].

[23] DEIR, p. 3-6.

[24] *See id.*, App. B, PDF p. 3; *see also* DEIR, pp. 4.1-19 – 4.1-20.

[25] *See id.*, p. 4.4-12.

[26] CEQA Guidelines, § 15124.

emissions, and event activity, but does not provide a clear history or quantified schedule for that use. RACA previously identified evidence that portable-light use expanded over time and that earlier environmental documents described a sports field without permanent lights. The DEIR should disclose when and under what authority the portable lights began operating, how many units are actually used, the number and duration of illuminated evenings, the applicable brightness and aiming conditions, and whether the selected observations represent ordinary baseline conditions. O4-31 (Cont.)

The history of phased improvements also requires the DEIR to distinguish among: O4-32

(1) facilities and operations approved by the 2010 EIR;
(2) improvements later approved through categorical exemptions or separate actions;
(3) actual physical conditions when the 2026 NOP was issued; and
(4) the maximum operations those successive improvements now make possible.

The Final EIR should provide a comparison identifying the components approved, constructed, or left unbuilt under each prior action; the attendance and operating assumptions used in each environmental review; and all mitigation measures or operational limits that remain applicable.

As Mr. Johnson explains, the game attendance and parking information provided in the LTA also deserves closer scrutiny.[27] O4-33

The present physical baseline cannot substitute for disclosure of the Project's incremental change from the previously approved operating program or obscure the manner in which earlier phases—including artificial turf, a scoreboard, concession and restroom facilities, and a ticket booth—combine with the proposed lights, bleachers, elevated press box, and permanent PA system to enable high-attendance day and nighttime practices, games, and events. O4-34

The DEIR also misdescribes the Project's setting by misplacing the boundary of the American River Parkway. An EIR must describe "the physical environmental conditions in the vicinity of the project," placing "[s]pecial emphasis" on "environmental resources that are rare or unique to that region and would be affected by the project."[28] "Before the impacts of a project can be assessed and mitigation measures considered, an [EIR] must describe the existing environment. It is only against this baseline that any significant environmental effects can be determined."[29] Where an EIR misdescribes the setting, "a proper analysis of project O4-35

[27] *See* Exh. D – Johnson Report, pp. 2, 6, 11–18.

[28] CEQA Guidelines, § 15125, subds. (a), (c).

[29] *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952, citing Guidelines, §§ 15125, 15126.2, subd. (a).).

impacts [is] impossible."[30] The DEIR repeatedly states that the campus is "separated from" the Parkway by the north-bank levee and that, "[a]lthough 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."[31] That is incorrect. The levee next to Rio Americano High School is located on a Sacramento County parcel within the American River Parkway and is subject to the Parkway Plan's Limited Recreation land use designation.[32] The levee does not separate the campus from the Parkway; it is part of the Parkway. The DEIR itself states that "[t]he northern Parkway boundary within this subarea is adjacent to single-family residential neighborhoods and the Rio Americano High School." The Department of Regional Parks, which administers the Parkway Plan, likewise describes the campus as "directly adjacent to the American River Parkway."[33]

O4-35 (Cont.)

The error matters because the DEIR's analysis depends on it. The lighting analysis assigns the Parkway's most protective classification, Lighting Zone LZ-0, only to "the segment of the American River Parkway that is south of" the levee and "separated by" it from the campus. It attributes the brighter conditions of the adjacent neighborhoods to "the Parkway periphery and levee top," which it says "do not extend into the Parkway corridor itself."[34] The DEIR then tests compliance with "the 0.1 footcandle standard for the Parkway," but only at what is misidentified as "the northernmost edge of the Rio Americano Parkway, coinciding with the levee toe and Jedediah Trail," on the river side of the levee.[35] On the same premise, it places the Parkway about 100 feet south of the campus. It measures the light standards' distances to the Parkway (175 and 435 feet) and the stadium's (125 feet) from that edge. And its alternatives analysis treats the Jedediah Smith Memorial Trail as "the only recreational facility within the Parkway in the project vicinity."[36] Because the levee is part of the Parkway, the Parkway begins at the campus boundary. The LZ-0 classification and its 0.1-footcandle limit therefore apply at the landside levee toe and on the elevated crown, where pedestrians and bicyclists use the Parkway in direct view of the 80-foot light standards. Each distance-based conclusion about Parkway lighting, views, habitat, and recreation overstates the Project's separation from the Parkway by the width of the levee. The Final EIR should correct the Parkway boundary throughout and map it in relation to each Project component. It should

O4-36

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[30] *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1122 ["Due to the inadequate description of the environmental setting for the project, a proper analysis of project impacts was impossible"].

[31] DEIR, pp. 4.2-1, 4.5-1; see id. at pp. 3-4, 4.1-7, 4.1-8 [the levee crown is "technically not part of the Parkway"], 6-5, 6-14, 7-5 – 7-6.

[32] Sacramento County Assessor, APN 292-0210-031-0000 [owner: County of Sacramento]; parcel zoned "O (PC) - RECREATION/PARKWAY CORRIDOR"; County of Sacramento, American River Parkway Plan (2008), pp. 173-174 [Rio Americano Area description and land use map depicting parcel as designated Limited Recreation].

[33] DEIR, pp. 4.1-8 – 4.1-9; DEIR, App. A, letter from Liz Bellas, Director, Sacramento County Department of Regional Parks (Feb. 4, 2026), p. 1 [PDF p. 151].

[34] *See id.*, p. 4.1-11.

[35] *See id.*, p. 4.1-19 [citing Musco Lighting Report, p. 18].

[36] *See id.*, pp. 4.1-14, 4.1-19, 6-5, 6-14.

then revise the aesthetics, lighting, biological, recreation, and land-use analyses to measure effects from that boundary, including light levels on the levee crown, for which the Musco report provides no calculation grid (see Section III.A). The same correction bears on the Parkway Plan consistency analysis discussed in Section II.C.

O4-36 (Cont.)

C. Parkway Plan Consistency Requires a Direct Determination

O4-37

The DEIR's own land-use section states that the Urban American River Parkway Preservation Act mandates consistency for development adjacent to the Parkway. Yet the DEIR repeatedly treats the Parkway Plan as merely contextual because the footprint is outside the mapped Parkway boundary, and then concludes that no land-use conflict would occur because the school use and campus boundary would remain unchanged.[37] That reasoning does not address the relevant question: whether the District's land-use decision authorizing tall permanent lights, amplified events, increased attendance, and late-evening operations adjacent to the Parkway is consistent with the Plan's policies governing adjacent land uses, wildlife, visual buffers, intrusive lighting, and protection of Parkway resources.

At minimum, the District should identify every applicable Parkway Plan policy; apply each policy to both construction and operation; address the County's role as Parkway Manager; explain any disagreement with County Parks; and adopt measures sufficient to avoid or mitigate inconsistency. A conclusion based primarily on the preexisting school use does not evaluate the changed activity enabled by the Project.

D. The DEIR Must Address the Whole of the Action and Cumulative Campus Development

O4-38

CEQA defines the "project" as the whole of an action that may cause a direct or reasonably foreseeable indirect physical change in the environment.[38] An agency may not divide an integrated undertaking into smaller components whose impacts appear less consequential when considered separately. Future activity must be included when it is a reasonably foreseeable consequence of the presently reviewed project and is likely to change the project's scope, nature, or environmental effects.[39]

The rule does not convert every improvement on a school campus into a single CEQA project. Separate review may be appropriate where improvements possess independent utility, serve distinct purposes, and are not contingent upon or undertaken to facilitate one another. The relevant inquiry is functional, not merely geographic: whether the activities are components or phases of a common undertaking; whether one component enables, requires, or commits the District to another; whether they share planning, funding, utilities, construction

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[37] *See* DEIR, pp. 5.9-29 – 5.9-30.

[38] CEQA Guidelines, § 15378, subd. (a).

[39] *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396–399 (*Laurel Heights I*); *Banning Ranch Conservancy v. City of Newport Beach* (2012) 211 Cal.App.4th 1209, 1222-1226; *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1222-1231.

access, or operating assumptions; and whether separate review would obscure their combined environmental consequences. O4-38 (Cont.)

The documented history raises substantial questions that the DEIR does not adequately answer. The 2010 Outdoor Sports Facility Upgrades Project and the current Project overlap in their treatment of bleachers, athletic fields, supporting facilities, and the public-address system. The 2017–2021 improvements added artificial turf, a resurfaced track, a scoreboard, concession and restroom facilities, and a ticket booth. Those facilities, together with the presently proposed permanent lighting, expanded bleachers, elevated press box, and permanent PA system, would function as an integrated venue for day and nighttime sports games, practices, graduation, assemblies, and community events. The 2024 Facilities Master Plan, whose June 2024 vision site plan for Rio Americano already shows stadium lighting, bleachers and a press box, may further demonstrate that the current proposal was contemplated as part of a broader campus-improvement program. In addition, the timeline identifies a 2018 DSA application for a sports field, landscaping, and supporting utilities that apparently remained open as of August 2026. The District should disclose whether that work is incomplete, pending, superseded, or included in the present Project. O4-39

The Final EIR should therefore provide a component-by-component comparison of the 2005–2010 project, the 2017–2021 athletic improvements, the 2024 Facilities Master Plan, and the current Project. It should identify what was approved, constructed, abandoned, or remains pending; explain whether the current Project is a new undertaking, a modification or later phase of the 2010 project, or implementation of the Facilities Master Plan; and explain the District's treatment of Public Resources Code section 21166 and CEQA Guidelines sections 15162 through 15164. The District should also identify all mitigation measures and operating conditions adopted in 2010 or in later approvals, report their implementation and compliance status, and explain whether they will remain applicable or be replaced.

The cell tower presents a related but fact-dependent question. Because the cell tower project is located on the same campus and is being processed concurrently, the District should disclose (1) whether the projects share utilities, trenching, access, staging, security, emergency-power infrastructure, site preparation, or other implementation features and (2) whether either project was planned or approved in reliance on the other.[40] If such a functional relationship exists, the District must evaluate the connected activities as part of the whole action. O4-40

At minimum, the cell tower and all other reasonably foreseeable Facilities Master Plan improvements must receive complete cumulative analysis. That analysis should include a O4-41

[40] The District's consultant concluded in October 2025 that the tower would make no cumulatively considerable contribution to any cumulative impact. It did not mention this Project, although the District's consultants were by then conducting bat surveys, traffic counts, and noise measurements for it. *See* Exhibit I – Terracon Consultants, Inc., *CEQA Notice of Exemption and Categorical Exemption Memorandum* (Oct. 29, 2025), pp. 4–5; *see also* DEIR App. C, pp. 2–4 [roost assessment July 25, 2025; emergence surveys July 30–31 and Aug. 28–29, 2025]; App. E, PDF p. 3 and Att. A [traffic counts Aug. 29, 2025]; App. D [noise measurements Aug. 29 and Sept. 17, 2025].

combined visual simulation of the 90-foot tower and four 80-foot sports field-light standards; potential overlapping construction; generator and sports field-event noise; traffic, parking, and emergency access; artificial light and wildlife disturbance; drainage and spill risk; and combined effects on Parkway resources and consistency with the Parkway Plan. The analysis should also identify other pending or incomplete campus projects rather than limiting the cumulative list to projects selected without reference to the District's own Facilities Master Plan. O4-41 (Cont.)

E. Mitigation Must Be Enforceable and Effective O4-42

CEQA requires mitigation measures to be fully enforceable through permit conditions, agreements, or other legally binding instruments. When implementation details are deferred, the agency must commit itself to mitigation and establish specific performance standards governing the later action.[41]

Several proposed measures do not satisfy those requirements. The transportation analysis assumes that the District will later execute a shared-parking agreement with Jesuit High School. Mitigation Measure 4.4-3b defers the identification of off-site parking, travel routes, crossing treatments, staffing, and transportation-demand controls to a future Event Transportation Management Plan. The noise mitigation allows an alternative public-address performance level and permits the District to determine that certain bleacher treatments are infeasible. As RACA's acoustical expert explains, without a quantified analysis of bleacher noise the bleacher measure is "nearly toothless," and the infeasibility exception compounds the problem.[42] Moreover, although the noise significance discussion refers to a real-time complaint-response and corrective-action process, those requirements do not appear in the operative text of Mitigation Measure 4.3-1b. O4-43

Parking cuts both ways. Sacramento County's conditions of approval for Jesuit High School require Jesuit, during maximum-capacity events (above 2,500 attendees), to implement a shared-parking arrangement with nearby entities, "which may include but not be limited to Rio Americano High School."[43] The DEIR counts Jesuit's lots as available to Rio, while the County's conditions count Rio's lots as available to Jesuit. The same spaces cannot serve both schools' overflow, and neither document accounts for the other. The overlap is not hypothetical. During a Jesuit evening game on September 4, 2026, RACA's consultant recorded heavy parking along American River Drive and Jacob Lane.[44] O4-44

Mitigation Measure 4.4-3c, "High-Capacity Event Access and Circulation Management," illustrates the problem particularly clearly. Although its introductory sentence states that the O4-45

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[41] Pub. Resources Code, § 21081.6, subd. (b); CEQA Guidelines, § 15126.4, subd. (a)(1)(B), (2).

[42] *See* Exh. C – Watry Report, § 4.2, p. 6.

[43] *See* Exh. E --- Item 20: County of Sacramento, Jesuit High School Stadium Lighting (PLNP2021-00262), Planning Commission staff report and Conditions of Approval (Mar. 11, 2024), Condition 17; Board of Supervisors appeal hearing (June 4, 2024).

[44] Exh. A – Eagle Sight Report, § 3, p. 2; § 4, p. 3; Fig. 3.

listed measures "shall" be implemented, every operative requirement uses the advisory term "should."[45] Thus, the measure does not unambiguously require the American River Drive/Saverien Drive intersection to serve as the principal entrance and exit, closure of the adjacent western entryway, directional signage to Parking Lot 2, continued operation of the western and eastern campus driveways, or maintenance of the connections between Parking Lots 4 and 5.[46] The use of "should" leaves each action discretionary even though the DEIR relies on implementation of Mitigation Measures 4.4-3a through 4.4-3c to conclude that parking, circulation, queuing, and pedestrian and bicycle safety impacts would be less than significant. O4-45 (Cont.)

Mitigation Measure 4.4-3c also lacks an objective trigger and performance standards. It applies to events "anticipated to approach or exceed available on-site parking capacity," but does not define the verified parking capacity, the attendance or parking-demand threshold that activates the measure, who makes that determination, or how far in advance it must be made. Its stated purpose—"to promote efficient event access and circulation"—does not establish measurable requirements governing maximum queues, obstruction of travel lanes or bicycle and pedestrian facilities, emergency access, staffing, signs, traffic-control deployment, or post-event clearance. Nor does the measure require monitoring, documentation, corrective action, or a mandatory operational response if the prescribed circulation pattern proves ineffective.

RACA's transportation expert has prepared a report that further demonstrates why Mitigation Measure 4.4-3c cannot remain advisory. The LTA's own traffic assignment shows that the circulation controls in Mitigation Measure 4.4-3c would be needed at every home game, not only at rare peak events.[47] For a typical 2,200-person game, the LTA routes about 657 arriving vehicles into the two driveways that serve Parking Lots 4 and 5, which hold 371 cars, and about 821 vehicles into campus driveways overall. Yet the campus has 672 event spaces, and the LTA itself expects 151 vehicles to park on the street. The LTA does not say where the vehicles that find the lots full would go, and its intersection analysis omits their return to American River Drive in search of parking. Mr. Johnson calls this "an impossible situation." Even if Lots 4 and 5 were empty when game traffic began to arrive, at least 286 of those vehicles would be turned away to hunt for parking, and the LTA's analysis does not account for them.[48] The measure should be revised to incorporate the applicable recommendations as mandatory requirements, identify measurable circulation and safety standards, and require attendance reductions or other operational restrictions if those standards cannot be achieved. O4-46

[45] DEIR, p. 4.4-16.

[46] *Id.*, pp. 4.4-15–4.4-16.

[47] *See id.*, Appendix E, LTA, Exh. 4 (Project Trip Assignment) (PDF p. 25); *id.*, Table 14 (PDF p. 15) (672 on-site spaces; parking deficit of 151); *id.*, Att. E (Existing (2025) plus Project worksheets, Intersections 2–4).

[48] Exh. D – Johnson Report, pp. 12–13

The Final EIR should revise Mitigation Measure 4.4-3c to replace every "should" with "shall" and to: O4-47

1. establish a quantified trigger based on projected event attendance, verified available parking supply, and anticipated parking demand;

2. identify the District official responsible for determining before each event whether the trigger will be exceeded and for documenting that determination;

3. require the specified driveway assignments, entry closure, internal connections, signs, trained personnel, and traffic-control measures whenever the trigger is met;

4. establish measurable standards prohibiting queues or event-related activity from obstructing through-travel lanes, bicycle facilities, sidewalks, marked crossings, campus driveways, fire lanes, and emergency-access routes;

5. require real-time monitoring during ingress and egress, retention and public availability of monitoring records, and review after each high-capacity event—not merely after the first such event;

6. require predetermined corrective measures if a performance standard is exceeded, including additional trained personnel, revised routing or traffic control, and coordination with County transportation and emergency-response personnel; and

7. require an enforceable fallback—such as advance-ticketing restrictions, reduced attendance, or cancellation of the affected event type—if available parking and circulation measures cannot satisfy the adopted standards.

The expert reports submitted by RACA also identify specific measures capable of making the mitigation program more objective and effective. O4-48

- Dr. Smallwood recommends surveys and analysis of the Parkway wildlife community; lighting limits (lamps of 3,000 K or less, no color-changing or upward-aimed fixtures, full shielding toward the Parkway, lights off soon after each event, and a cap on lit nights); a noise limit at the Parkway's edge; protection and replacement of the tree row; measures to keep event attendees out of the Parkway after dark; before-and-after bat monitoring with thresholds that trigger further mitigation; and enforceable nesting-bird and elderberry protections.

- Mr. Watry recommends continuous noise monitoring with public reporting and automatic alerts, damping compounds on the undersides of the bleacher seats and floorboards, and absorptive walls at the bleachers. O4-49

- Mr. Johnson recommends basing the transportation analysis on a realistic on-campus design event, such as the 2025 Rio Americano–Jesuit game, for which 3,197 tickets were sold and at least 3,397 people attended, including the band, and O4-50

removing from the parking supply the Saverien Drive spaces that would block the bicycle lanes. He also finds that the crosswalk markings the LTA proposes would not be sufficient for nighttime events.[49]

O4-50 (Cont.)

These recommendations are evidence of potentially feasible mitigation. The Final EIR must evaluate them individually and provide a reasoned, evidence-based explanation for any measure the District declines to adopt. A conclusory statement that a recommendation is unnecessary, impractical, or infeasible would not respond to the technical evidence or support rejection of an otherwise feasible measure.

O4-51

The District likewise should not rely on the anticipated success of an unexecuted parking agreement or a later management plan without establishing binding commitments, objective standards, monitoring, corrective action, and an enforceable alternative if the contemplated arrangements are unavailable or ineffective. Until those deficiencies are corrected, the conclusion that transportation, pedestrian and bicycle safety, queuing, and emergency-access impacts would be reduced to less than significant is unsupported.

F. Referenced Materials and Meaningful Public Review

O4-52

The DEIR relies on technical appendices and other materials for lighting, biological surveys, noise, traffic, VMT, air quality, and project operations. RACA reserves the right to supplement these comments if any referenced material was not made available for the full review period or if the materials made available differ from those relied upon in the DEIR. The District should identify and preserve the precise versions of every model input, plan, guideline, management standard, memorandum, and technical report on which the analysis relies.

The transportation and VMT studies included as Appendices E and F are dated September 1, 2026, and the Local Transportation Analysis is still marked "DRAFT," while the DEIR's reference list dates the LTA July 3, 2026 and the VMT analysis June 19, 2026. The Final EIR should identify which version of each study the analysis relied on.

G. The DEIR Fails to Disclose and Reconcile the 2010 EIR, Its Mitigation Commitments, and Its Contrary Environmental Conclusions

O4-53

The DEIR's account of the Raider's track and field's history is materially incomplete. It states only that "[b]leacher seating and small upgrades at the sports field were installed in 2006" and that unspecified "improvements to the sports field were completed in 2019."[50] It does not disclose that the District previously prepared and certified a full EIR for a coordinated series of outdoor sports-facility improvements at this same campus; that the prior project included bleachers, an announcer's booth, a portable public-address system, and related athletic facilities; that the Board approved a reduced-capacity alternative; or that the Board

[49] Exh. B— Smallwood Report, pp. 42, 57–61; Exh. C – Watry Report, §§ 5.1–5.4.2, pp. 7–10; Exh. D – Johnson Report, pp. 14, 17–18.

[50] DEIR, p. 3-1.

adopted mitigation measures and a statement of overriding considerations for significant and unavoidable impacts.[51]

O4-53 (Cont.)

This omission is particularly conspicuous because the DEIR selectively relies on work performed for the 2010 environmental review. Section 4.5.3 expressly discusses the "2010 Previous EIR" and relies on the pedestrian archaeological survey prepared for that review, and the bibliography cites the 2010 EIR's Cultural Resources Evaluation.[52] Yet the DEIR does not identify or discuss the 2010 EIR in its project background, environmental baseline, aesthetics, biological-resources, noise, transportation, air-quality, cumulative-impact, mitigation, or alternatives analyses.

CEQA Guidelines section 15150 provides the established procedure for incorporating a prior public environmental document by reference. If that procedure is used, the EIR must summarize or describe the incorporated material, explain its relationship to the current analysis, identify where the incorporated document is available for public inspection, and provide the prior EIR's State Clearinghouse number.[53] Because incorporation by reference is most appropriate for lengthy background or technical material that does not contribute directly to the analysis at hand, the prior EIR's material impact conclusions, mitigation commitments, and alternatives analysis also must be disclosed and reconciled sufficiently within the current EIR to permit informed review.[54]

The differences between the two environmental reviews are substantial. As summarized in the attached comparison table, the 2010 and current EIRs materially differ with respect to: (1) the description of existing and proposed seating and other sports field facilities; (2) the treatment of nighttime lighting and events as either proposed or existing conditions; (3) conclusions concerning visual character, glare, and compatibility with the Parkway; (4) construction- and operational-noise mitigation; (5) operational effects on Parkway wildlife; (6) transportation, parking, and cumulative air-quality conclusions; and (7) the range and feasibility of reduced-capacity alternatives.[55]

Updated evidence, standards, or methodologies may support some different conclusions. But the District cannot silently disregard its prior findings and mitigation commitments. The Final EIR must identify the factual, technical, or regulatory basis for each

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[51] See Rio Americano High School Outdoor Sports Facility Upgrades EIR, SCH No. 2005072119 ("2010 EIR"); *see also* 2010 Findings, pp. 7, 15; *see also* 2010 FEIR, pp. 2-18 – 2-19 [letter 7, Save the American River Association, Warren V. Truitt, President (Apr. 20, 2010), stating SARA's understanding that "nothing will be constructed or installed as part of, or in conjunction with, the Sports Facility Upgrades to facilitate the future addition of nighttime lighting of the sports fields," and response 7-3: "The commenter's understanding of the proposed project with regard to lighting is correct"].

[52] DEIR, pp. 4.5-6, 8-4.

[53] CEQA Guidelines, § 15150, subds. (a)–(d); *see also Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 442–443 (criticizing information "scattered here and there" in appendices).

[54] *Id.*, subd. (f).

[55] *See* Exh. H – Table Summary Comparison Between the 2010 and 2026 Environmental Reviews.

material change; disclose whether the previously required mitigation was implemented and remains operative; and evaluate whether that mitigation remains feasible and applicable to the current Project. Where the current DEIR relies on existing landscaping, facilities, or operating conditions produced by the prior project, it must also disclose whether those conditions resulted from implementation of the 2010 mitigation program.

O4-53 (Cont.)

1. Project history and environmental baseline

O4-54

The 2010 EIR described then-existing stadium improvements as including portable bleachers for approximately 1,250 spectators, a public-address system, scoreboard, temporary snack bar and restroom, fencing, sidewalks, and track-and-field improvements. It evaluated permanent seating for 1,800 spectators, and the Board approved permanent seating for approximately 1,400, an announcer's booth, and a public-address system.[56] The current DEIR, by contrast, identifies only approximately 288 existing seats and proposes approximately 2,575 seats.[57] It does not explain what happened to the facilities evaluated or approved in 2010, which components were constructed or removed, whether the 2019 work implemented or modified the 2010 approval, or which prior mitigation obligations remain operative.

The lighting baseline presents a similar unexplained discontinuity. The 2010 Findings expressly state that "[n]o nighttime lighting of sports fields is proposed as part of the Project," and they describe the 2007 field improvements as having "allowed RAHS to begin hosting football games during daylight hours."[58] The current DEIR treats the use of portable diesel-powered lights for nighttime activities as an existing condition and characterizes permanent stadium lighting as replacing that existing use.[59] The DEIR must disclose when regular nighttime lighting and events began, how they were authorized, and how that operational history relates to the project approved in 2010.

2. Aesthetics, lighting, and Parkway compatibility

The 2010 EIR found that the athletic-facility upgrades would reduce the overall visual quality of the site, thereby causing a significant impact. The 2010 EIR also found potentially significant glare from low-level security lighting and from the bleachers and announcer's-booth windows, which the Board found would reduce the impact to less than significant. The Board required shielded, downward-aimed security lighting, the landscape screening, and dark green or brown exterior colors, and it found that glare into the Parkway would be prevented "by prohibiting the installation of any windows on the rear of the announcer's booth that would face the American River Parkway."[60] The 2010 EIR also treated potential glare from low-level

[56] 2010 FEIR, p. 3-10; 2010 Findings, pp. 6–9, 41–42.

[57] DEIR, pp. 1-1, 3-1, 3-4.

[58] 2010 Findings, pp. 7, 15; see also 2010 FEIR, pp. 2-18 – 2-19 [letter 7, Save the American River Association (Apr. 20, 2010), and response 7-3].

[59] DEIR, pp. 3-1, 3-4, 4.1-19 – 4.1-20.

[60] 2010 Findings, pp. 15–16.

security lighting, bleachers, and the announcer's-booth windows as potentially significant and imposed directional shielding, downward aiming, landscaping, low-reflective materials, and restrictions on windows facing the Parkway.[61]

O4-54 (Cont.)

The current DEIR reaches a materially different conclusion for a larger seating installation (a more than 800% increase from the existing 288 bleacher seats), press box, and four 80-foot light standards. It finds the change in visual character less than significant without mitigation, reasoning in part that silver-gray steel poles and bleachers would blend with the sky and existing development.[62] Lighting impacts would be reduced through a DarkSky "pass" rating, but the DEIR does not carry forward or evaluate the prior landscaping, color, shielding, and material requirements. The Final EIR must explain the evidentiary basis for treating larger and more visible facilities as less significant than the smaller facilities the District previously found would cause a significant visual impact absent mitigation. It must also disclose whether the previously required landscaping was installed, whether it has been maintained, and whether the current project would remove, impair, or rely upon that mitigation.

3. Construction and operational noise

O4-55

The 2010 EIR found construction noise significant but reducible to less than significant through measures requiring properly maintained equipment, the best available noise-suppression devices, shrouding or shielding of impact tools, muffling or shielding of equipment intake and exhaust ports, limits on idling near sensitive receptors, restricted work hours, and placement of stationary equipment as far as possible from sensitive receptors.[63] The current DEIR instead concludes that construction noise will remain significant and unavoidable under a mitigation measure that primarily requires notice, work-hour restrictions, limits on non-safety horns, and a 150-foot setback for stationary equipment and staging.[64] Its significance discussion refers to maintained equipment, noise-reduction devices, and a real-time complaint-response mechanism that are not clearly included as enforceable requirements in Mitigation Measure 4.3-1a. The District must explain why the previously adopted equipment controls were omitted and why measures previously found sufficient would no longer reduce a shorter, more limited construction project to less than significant.

Both the 2010 EIR and the 2026 DEIR conclude that operational stadium noise will remain significant and unavoidable. The mitigation packages, however, differ materially. The 2010 Board adopted a six-foot concrete-block sound wall along the eastern property line adjacent to five residences; placement of bands at the westernmost feasible location; limitation of marching-band performances to halftime; detailed speaker-location, orientation, shielding, and performance requirements; an adaptive-gain satellite-speaker system; a post-installation evaluation by an acoustic specialist after each upgrade, which the Board found would require

[61] *Ibid*.; *see also* 2010 MMRP, Mitigation Measure 3.1-2a.

[62] DEIR, pp. 4.1-16–4.1-18.

[63] 2010 EIR, p. ES-21; 2010 Findings, pp. 21–23.

[64] DEIR, pp. 4.3-17, 4.3-23–4.3-27.

the District to "provide additional noise measures if they are ineffective"; and limits on non-school public-address use to five hours per day, between 9:00 a.m. and 6:00 p.m., no more than four days per month.[65]

O4-55 (Cont.)

The current mitigation omits several of these measures even though seating would increase to approximately 2,575 and the project would enable substantially more evening and nighttime use. Although the current measure includes distributed speakers, volume controls, testing, noisemaker restrictions, and certain scheduling provisions, its bleacher treatments are partly discretionary and it does not require the previously adopted sound wall, band-location restriction, adaptive-gain specifications, continuing effectiveness evaluation, or non-school use limits.[66]

The 2010 Board rejected sound-blanket and wood-panel wraps around the bleachers and their railings, and cantilevered overhangs above them. It found that wood paneling would violate the Fire Code's requirement that bleachers be noncombustible, that the temporary bleachers could not carry the blankets' weight, that blankets on the permanent bleachers would require structural redesign and replacement every three to five years, and that blanket wraps would reduce noise by only 2 to 3 dB.[67] It did not reject the other measures identified above. Nor do those grounds apply to the noncombustible masonry walls or the damping treatments Mr. Watry recommends. The current DEIR therefore must evaluate the continuing feasibility of the measures actually adopted in 2010, including, but not limited to, a ban on air horns, which both previously adopted measures 3.6-3a and 3.6-3b required, and reassess previously rejected design measures in light of the new bleacher design and current technology.

4. Biological effects of nighttime lighting and activity

O4-56

The 2010 analysis assumed there would be no nighttime sports-field lighting. It found that Project noise might "occasionally startle or disrupt" wildlife using the Parkway, but would not have a substantial adverse effect "because of the existing level of human disturbance along the Parkway and the timing, infrequency, and duration of the potential disturbances."[68] The current DEIR acknowledges that artificial light can attract and disorient birds, alter reproductive and circadian behavior, increase exposure to predation, and reduce bat foraging habitat. It also acknowledges that stadium noise can cause stress, avoidance, reduced foraging, and interference with wildlife communication.[69] Nevertheless, it finds operational biological impacts less than significant without resource-specific operational mitigation, relying substantially on modeled illumination at the Parkway boundary, intermittent use, and the availability of other habitat.

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[65] 2010 Findings, pp. 23–28; *see also id.* at p. 26 (MM 3.6-3d).

[66] DEIR, pp. 4.3-24–4.3-26.

[67] 2010 Findings, pp. 44–49.

[68] *Id.*, pp. 13, 15, 34; 2010 Draft EIR, pp. ES-17 – ES-18.

[69] DEIR, pp. 4.2-17–4.2-21.

Those conclusions address materially different operations: approximately 40 evening or nighttime events and as many as 88 practice days involving some evening illumination, rather than the no-sports-lighting project evaluated in 2010, which was planned around approximately five home football games a year.[70] The Final EIR must squarely explain why this materially expanded nighttime use does not require operational biological mitigation and why the earlier analysis remains relevant—or is no longer relevant—to disturbance of wildlife using the Parkway corridor.

O4-56 (Cont.)

5. Transportation and cumulative air quality

O4-57

The 2010 EIR evaluated primarily daytime Saturday football games and seating alternatives of 1,250 to 1,800 persons. It found roadway, intersection, pedestrian, and bicycle effects less than significant, and it determined that parking would be adequate under the 1,250- and 1,400-seat alternatives. It also found that the project's operational criteria-pollutant emissions, although below the applicable project-level thresholds, would make a cumulatively considerable contribution to significant regional nonattainment conditions and therefore constituted a significant and unavoidable cumulative air-quality impact.[71]

The current DEIR proposes 2,575 seats, analyzes events involving as many as approximately 3,500 attendees, and would enable regular evening and nighttime operations. It identifies potentially significant event-related parking, circulation, pedestrian, and bicycle hazards requiring an updated parking agreement, event transportation management, and high-capacity-event controls. At the same time, it reaches a less-than-significant cumulative operational air-quality conclusion based principally on current SMAQMD project-level thresholds and an assumption that some travel would be shifted from other stadiums rather than newly generated.[72] Updated thresholds, data, and methodologies may support a different conclusion, but the DEIR must disclose and explain the change rather than silently disregard the District's prior contrary cumulative finding.

6. Reasonable alternatives

O4-58

In 2010, the Board found that a Limited Bleacher Expansion Alternative retaining 1,250 seats "would meet all of the Project objectives, while somewhat reducing noise and traffic impacts," would be environmentally superior with respect to noise, air quality, and greenhouse gas emissions, and would provide adequate parking. The Board approved a modified version with 1,400 seats, finding that it would "substantially meet all of the Project objectives" with the same reductions, although noise would remain significant and unavoidable under either

[70] DEIR, pp. 3-8–3-9, 4.1-19 – 4.1-20; *see also* 2010 Findings, pp. 32–33, 37. Compare the current DEIR's 40 evening and nighttime events and up to 88 practice days to the 2010 project objectives, which called for hosting "approximately five home varsity, junior varsity and freshmen football games per year." 2010 Findings, pp. 37, 50; *see also id.* at 31–33 [greenhouse-gas analysis assumed "only five new football events per year"].

[71] 2010 Draft EIR, pp. ES-25 – ES-27; 2010 Findings, pp. 13, 26–27, 33 & fn. 3, 36, 41–42.

[72] DEIR, pp. 4.4-12 – 4.4-18, 5.2-5 – 5.2-6, 7-4 – 7-5.

alternative.[73] The current DEIR nevertheless considers in detail only the No Project Alternative and relocation of the same 2,575-seat stadium elsewhere on campus. The relocation alternative reduces none of the identified impact topics and increases impacts in numerous categories.[74]

O4-58 (Cont.)

Because the current Project retains significant and unavoidable operational noise impacts, the Board's 2010 decisions are directly relevant evidence under CEQA Guidelines section 15126.6. The Board approved a 1,400-seat stadium, and it found that a 1,250-seat stadium would meet all of the project's objectives while reducing noise and traffic. The only alternatives it found infeasible were No Project and Existing Improvements Only.[75] The District may not omit that alternative without explaining, based on current substantial evidence, why a seating capacity in the previously studied and approved range is now infeasible or would fail to attain most of the current project's basic objectives.

The Final EIR should therefore:

(1) identify and make publicly available the complete 2010 DEIR, Final EIR, appendices, findings, statement of overriding considerations, approval documents, and mitigation record;
(2) summarize their relationship to the current project and identify SCH No. 2005072119;
(3) provide a measure-by-measure accounting of whether the 2010 mitigation was implemented, remains in effect, would be modified, or would be displaced by the current project;
(4) provide a comparison of the two EIRs' impact analyses, mitigation, and significance conclusions;
(5) carry forward all still-applicable feasible mitigation or provide a supported explanation for any omission or modification; and
(6) analyze a reduced-capacity alternative comparable to the 1,400-seat alternative the Board approved in 2010 and the 1,250-seat alternative it found would meet all project objectives.

If this reconciliation results in new significant effects, materially strengthened mitigation, or a substantially different alternatives analysis, the District should revise and recirculate the affected portions of the DEIR before certification.

[73] 2010 Findings, pp. 6, 40–42.

[74] DEIR, pp. 6-4–6-5, 6-16–6-17.

[75] 2010 Findings, pp. 6, 40–43.

III. SPECIFIC COMMENTS

O4-59

A. Aesthetics, Nighttime Lighting, and Parkway Views

The Project's proximity to a designated "wild and scenic" river corridor underscores the visually attractive setting. RACA therefore disputes the characterization in the DEIR that the affected view is not a scenic vista.[76] The relevant resource is the Parkway and levee visitor's scenic experience; the campus need not itself be scenic.

O4-60

The aesthetics section should be revised to resolve the contradiction between its 'zero light trespass' conclusion and the nonzero modeled footcandle levels at residential property lines.

- The DEIR reports property-line ranges of 0.02–0.13 fc horizontal and 0.05–0.28 fc vertical, yet concludes "zero light trespass."[77]
- Musco's point-by-point grid for the same property line reaches 0.40 fc horizontal and 0.37 fc vertical.[78] The Musco summary tables print "Maximum: 0," which hides those values.
- Both maxima exceed the 0.3 fc EPRI value for E2 zones that the DEIR itself cites as the benchmark for the site.[79]
- The DEIR discloses a maximum of 10,016 candela toward the property line and calls it "within the 'low' brightness range" (p. 4.1-25) without identifying the source of that range.

O4-61

The analysis should be revised to disclose all assumptions for fixture count, aiming, output, dimming, ball-tracker use, reflectance, atmospheric conditions, and vegetation; and distinguish light trespass from glare, visible source intensity, skyglow, color temperature, and the daytime visibility of the 80-foot structures.[80] The analysis should not treat the Parkway's closure after dark as eliminating effects on a protected scenic resource or on dusk users, wildlife, and the nighttime environment.

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[76] *See* DEIR, p. 4.1-15.

[77] *See id.*, pp. 4.1-19, 4.1-22, 4.1-25; *see also id.* at p. 7-3.

[78] *Id.*, App. B, PDF pp. 11–12.

[79] *See id.*, p. 4.1-11; site is LZ2/E2 and the Parkway is LZ0/E1, pp. 4.1-11, 4.1-19.

[80] The system includes four TLC-RGB-U red-green-blue fixtures on a separate "RGBU" circuit and four TLC-RGBW fixtures (App. B, PDF p. 3). These are effects or show lights, not field lighting, and the DEIR does not mention them. The DEIR should be revised to disclose their purpose, aiming, hours, and uplight, and whether they are compatible with a DarkSky "pass" and Parkway Plan lighting policies. The District should consider eliminating show lights as mitigation.

All Musco grids are 3 or 5 feet above field grade. There is no grid at the elevation of the levee crown or the Jedediah Smith trail, and no uplight or skyglow calculation. The DEIR should be revised to provide both.

The DEIR's distances from the light standards to the Parkway and trail also vary:

- 225–460 feet to the trail (p. 4.1-8);
- 175 and 435 feet to the Parkway and 230 feet to the trail (p. 4.1-14);
- about 100 feet to the Parkway (p. 4.1-19); and
- 125 feet from the stadium's southern edge (pp. 6-5, 6-14).

The Final EIR should use one set of measured distances. O4-62

Mitigation Measure 4.1-2 requires a future DarkSky 'pass' rating, but the DEIR should disclose the controlling criteria now and establish operational limits that remain enforceable after installation.[81] Further, the DEIR cannot demonstrate compliance for this Project by relying on a DarkSky "pass" obtained for a different project using similar equipment.[82] Appropriate subjects include maximum horizontal and vertical illumination at specified receptors, glare ratings, spectral output and the proposed 5,700 Kelvin color temperature, hours and annual duration, dimming levels, automatic shutoff, post-installation field verification, periodic retesting, maintenance, and corrective action. O4-63

The DEIR's lighting conclusions rest on an analogy. The DEIR presumes the Project will earn a DarkSky "pass" and cause no light trespass because "the same technology and similar design" earned a pass for "this similar project," the Jesuit High School stadium, and it concludes that Jesuit's lights, like the Project's, "would not contribute to glare or skyglow."[83] The DEIR reports no observation of the Jesuit system in operation. RACA's consultant made one. On the evening of Friday, September 4, 2026, Eagle Sight Drone Intelligence Group recorded aerial photographs and video during a Jesuit home football game. The imagery shows illumination extending beyond the playing surface onto adjacent tree lines, open areas, parking and access areas, and nearby ground, and shows the lit stadium as the dominant light source across the surrounding residential area.[84] The report shows that the system the DEIR treats as proof of "zero light trespass" lights a substantial area beyond the field and dominates the nighttime scene, which is difficult to reconcile with the DEIR's statement that such a system would not O4-64

[81] The biology section says the lighting plan "was submitted" to the International Dark-Sky Association. (DEIR, p. 4.2-18.)

[82] *See id.*, 4.1-25 [relying on the "pass" rating assigned to "this similar project," citing M. Neils Engineering, Inc. 2023]; *id.*, p. 8-1 [reference list: "M. Neils Engineering, Inc. 2023. Jesuit High School Stadium Lighting Report"].

[83] *See ibid.*; *see also id.*, p. 8-1 (M. Neils Engineering, Inc. 2023, Jesuit High School Stadium Lighting Report); see Exh. E, item 21.

[84] *See* Exh. A – Eagle Sight Report, § 4, p. 3, and Figs. 1–2, pp. 4–5; see also Exh. B – Smallwood Report, p. 53.

contribute to glare or skyglow.[85] The Final EIR should test its analogy rather than presume it: disclose the Jesuit system's fixtures, pole heights, color temperature, and operating levels; report measured horizontal and vertical illuminance at Jesuit's nearest residential property lines during an evening event; and explain what those measurements mean for a 64-fixture system on four 80-foot poles beside the Parkway. O4-64 (Cont.)

B. Biological Resources and Wildlife Corridor Functions

The DEIR's biological conclusions rest on two premises: that no special-status species have been identified on the site or affected area, and that the levee and a row of trees insulate the Parkway's habitat from Project light and noise. The record contradicts both. O4-65

1. The DEIR's premise that no special-status species occur is wrong.

The DEIR's conclusions rest on the premise that "no sensitive biological resources or special-status species have been identified on the project site."[86] The District's own bat consultant recorded a flock of about 60 yellow-billed magpies foraging on the athletic fields.[87] The yellow-billed magpie is a U.S. Fish and Wildlife Service Bird of Conservation Concern. Dr. Smallwood observed the same flocks moving between the fields and the Parkway, and recorded 25 other special-status species on the campus and in the adjoining Parkway habitat.[88]

The DEIR's desktop review compounds the error. It relied on a California Natural Diversity Database query to choose which special-status species to evaluate, and it evaluated only 15 special-status wildlife species, plus one fish.[89] The CNDDB is a positive-sighting database. It states that the absence of a record "does not mean that there are no special status species present." Dr. Smallwood identified 116 special-status species with recorded occurrences near enough to warrant evaluation. Of those, he reports that 39 have been recorded at the site or in the adjoining Parkway, and more than two-thirds have been recorded within four miles. Seven of the ten species the DEIR found unlikely to occur, or with no potential to occur, have been documented within 1.5 miles.[90] The Final EIR must evaluate occurrence and impacts for the special-status species the record shows are present or likely present.

Dr. K. Shawn Smallwood conducted field surveys of wildlife and habitat at and adjacent to Rio Americano High School on five dates between February 10 and September 10, 2026. O4-66

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[85] The brightness of the lit turf and track seen from above is itself reflected uplight, the source of the skyglow that the Musco calculations do not address. See Exh. A, Figs. 1 and 4.

[86] DEIR pp. 4.2-15, 7-6.

[87] *Id.*, App. C: AECOM, Rio Americano High School Bat Survey Results (Dec. 18, 2025) ("App. C"), p. 4.

[88] *See* Exh. B – Smallwood Report, pp. 5, 10, 27–29 [Table 1].

[89] DEIR Table 4.2-1.

[90] *See* Exh. B – Smallwood Report, pp. 42–43 & Table 3 (pp. 44–48) (distances); DEIR Table 4.2-1, pp. 4.2-3 – 4.2-7 (DEIR occurrence ratings).

These were morning surveys on February 10 and April 30, and evening and nighttime surveys on March 24, June 4, and September 10, totaling about 22 hours. The surveys included portions of the open space south of the levee that the DEIR largely excluded from its biological study area. By day, Dr. Smallwood walked the accessible portions of the study area and scanned for wildlife with binoculars. At night, Dr. Smallwood recorded bats with an acoustic detector mounted on a five-meter pole, identifying species from their calls with SonoBat software.[91]

O4-66 (Cont.)

Dr. Smallwood recorded 127 species of vertebrate wildlife, 26 of them special-status species, including northwestern pond turtle, yellow-billed magpie, Nuttall's woodpecker, oak titmouse, northern yellow warbler, western grebe, California gull, osprey, Cooper's hawk, and sharp-shinned hawk.[92] Ten species of bats were detected acoustically (nine identified to species and one probable), seven of them special-status species. Bat activity on every survey night exceeded the average from Dr. Smallwood's other California surveys. The highest rate was recorded on the upper terrace of the Parkway, about 284 feet beyond the DEIR's project boundary.[93]

Many species moved between the athletic fields and the Parkway during the surveys, including large flocks of yellow-billed magpies, woodpeckers, swallows, red-tailed hawks, western bluebirds, wild turkeys, and a bobcat, with tracks of coyote and fox. From the Parkway's upper terrace, Dr. Smallwood watched bats fly over the levee to and from the athletic fields.[94] Dr. Smallwood also observed:

- skyglow over the Parkway already bright enough to identify owls by sight, without a headlamp;
- light from the campus casting sharp shadows through the riparian forest;
- birds relying on calls for courtship and for keeping contact with their young, including a mallard calling to her chicks on the lagoon;
- about 40 people on the Rio Americano wetland/lagoon area at midnight.[95]

O4-67

This evidence is directly relevant to the DEIR's assumptions concerning the location and quality of habitat, wildlife use of the stadium and adjoining open space, the effectiveness of the levee as a purported barrier, and the ability of wildlife simply to relocate in response to disturbance.

O4-68

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[91] *See* Exh. B – Smallwood Report, "Site Visits," pp. 4–5.

[92] *Id.* at p. 5.

[93] Id. at pp. 6-10 and 27-29 [Table 1].

[94] Id. at p. 34.

[95] Id. at pp. 5–6, 9 [Photos 6–7].

2. The DEIR excluded the habitat the Project would affect.

O4-69

The geographic scope of the biological investigation further undermines the DEIR's conclusions. Appendix C describes a nominal survey area extending approximately 500 feet from the sports field, but states that the area actually surveyed was "field-fit based on the likelihood of potential roost habitat and the amount of light and noise buffering" between the stadium and that habitat. The biologist found potential roost cavities in Parkway trees, but ended further survey of them because "a row of large trees (mostly eucalyptus species)" along the southern fenceline would screen them from Project lighting and noise.[96] The disclosed emergence surveys concentrated on the campus fence line and did not provide equivalent coverage of the open space immediately south of the levee.[97]

That approach is circular: the DEIR excludes the Parkway habitat from study on the assumption that light and noise will not reach it, then relies on that same unstudied habitat being 'abundant' and 'superior' to conclude the effects are insignificant.[98] The screening premise does not hold up. Dr. Smallwood estimated the heights of the trees. The oaks in the row are 24 to 36 feet tall, and the conifers near the planned press box are 36 to 56 feet tall. Only the westernmost 175 feet of the row reaches about 75 feet. The new home bleachers would rise above about half of the trees, and the 80-foot light standards above all of them.[99] The DEIR itself acknowledges that the upper portions of the light standards would be visible from the Parkway.[100] Yet no mitigation measure requires the District to keep the row. The District's 2010 mitigation required evergreen screening trees along this same boundary, to be maintained for as long as the school operates.[101] The Final EIR should disclose whether any of the existing row was planted under that measure. If so, its retention is already required.

The DEIR's tree-protection measures cover native trees only, and Appendix C describes the row as "mostly eucalyptus."[102] If the District relies on the row to screen the Parkway, the Final EIR must make its retention and maintenance an enforceable condition.

O4-70

All four bat emergence surveys took place July 30–31 and August 28–29, 2025; the roost assessment was conducted during a single afternoon in July 2025.[103] Each of the four evening

O4-71

[96] DEIR App. C, pp. 2–3.

[97] *See id.*, Appendix C, AECOM, Rio Americano High School Bat Survey Results (Dec. 18, 2025), pp. 2-4.

[98] *Compare id.* at pp. 4.2-1 – 4.2-3 (study area limited to the campus and about 100 feet beyond) *with* Exh. B – Smallwood Report, 'Site Visits,' pp. 4-5.

[99] *See* Exh. B – Smallwood Report p. 39.

[100] *See* DEIR pp. 4.1-17 – 4.1-18, 6-7.

[101] 2010 Findings, pp. 14–15. The current DEIR's Appendix C describes the row as mostly eucalyptus, which is not a recommended species.

[102] DEIR pp. 3-10 – 3-11, 4.2-9 – 4.2-10; App. C, p. 3.

[103] DEIR App. C, pp. 2–4 [roost habitat assessment, afternoon of July 25, 2025; emergence surveys July 30–31 and Aug. 28–29, 2025].

watches covered half of the tree row, and a single biologist watched for emerging bats by naked eye, without infrared equipment.[104] No winter or early-maternity surveys were conducted. From acoustic files it describes as "[u]nvetted," Appendix C identified three bat species. Dr. Smallwood detected ten, seven of them special-status species.[105] On July 30, a continuous eight-minute stream of Mexican free-tailed bat calls began at 8:44 p.m. Appendix C calls the pattern "consistent with an emergence of this bat species from a roost in the vicinity," but no one looked for that roost.[106]

O4-71 (Cont.)

Impact 4.2-1 and the cumulative and mandatory-findings discussions cite "bats (see Table 4.2-1)."[107] The table lists no bat species. The Final EIR should add the species the surveys detected and the special-status bats with potential to occur, with their status.

The District's own consultant acknowledged the risk. Appendix C states that the Project's lighting and noise changes "could cause permanent and potentially significant impacts" if they caused roost abandonment during the maternity season or the winter months. It states that the changes "could result in a permanent loss of foraging habitat for a portion of some nights." And it explains that some species, such as the pallid bat, "require foraging habitat very near their roosting habitat, so loss of important foraging habitat may also result in abandonment of nearby roosts."[108] Appendix C reached a less-than-significant conclusion only by relying on the portable-light baseline, on "minor" foraging observed over four summer evenings, and on "abundant, generally superior" foraging habitat in the Parkway that it never surveyed as foraging habitat.[109] Those premises do not support the DEIR's conclusion.

O4-72

The DEIR says lighting effects on bats would be significant if they caused roost abandonment during the maternity season (April–August) or hibernation (November–February). It finds the impact less than significant because football season, late August to early November, "is largely outside the typical roosting bat season."[110] But the stadium lights also serve practices and other sports, which the DEIR says use the existing lights "primarily during the week in winter months."[111] The DEIR's own noise survey documents a February soccer

O4-73

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[104] *Id.* at p. 3.

[105] *Id.* at p. 4; Exh. B – Smallwood Report, pp. 2, 34, 41.

[106] *Id.* at p. 4.

[107] DEIR, pp. 4.2-15, 7-6, 7-15.

[108] DEIR App. C, p. 2.

[109] *Id.*, p. 4. The biologist's one evening in the Parkway, July 31, was spent watching the campus tree row for emerging bats. App. C, p. 3.

[110] DEIR, pp. 4.2-18 – 4.2-19.

[111] *Id.*, pp. 1-1, 3-7; *see also* DEIR, Appendix C, p. 1. The consultant who found no significant effect on bats described the lights' main use as falling inside the hibernation window it identified.

game.[112] Graduation is in June. Up to 88 practice days could include evening illumination.[113] Those uses fall inside both sensitive windows. O4-73 (Cont.)

3. The DEIR does not analyze how Project noise and light would affect wildlife. O4-74

The biological analysis acknowledges suitable Parkway habitat for northwestern pond turtle, valley elderberry longhorn beetle, special-status and migratory birds, and bats, and confirms bat foraging along the playing field. Nevertheless, it treats indirect lighting and operational-noise effects as less than significant or nonexistent. The analysis should explain how that conclusion can be reconciled with projected event noise reaching Parkway habitat, the noise section's significant-and-unavoidable finding, the use of 5,700 K lighting, football activity beginning during nesting and migration seasons, graduation in June, and the broader schedule of day and evening practices and events.

The DEIR made no noise measurements within the Parkway habitat. Its biological analysis concedes that "[n]o evening noise measurements were collected south of the project site."[114] Its own projection is that football-game noise would reach approximately 59 to 72 dBA Leq at 100 feet. It then compares those nighttime event levels with the daytime ambient level on the trail (55 dBA Leq), and on the same page it reports the trail's existing maximum level as both 84 and 78 dBA. It also describes the El Camino reference game, attended by about 3,000 people, as "greater than the proposed capacity," although the Project would allow events of 3,400 to 3,500 people.[115] O4-75

Mr. Watry's analysis shows that the DEIR's reference data understate game-period noise. (See Noise and Vibration, *ante*.)[116] Dr. Smallwood summarizes studies showing that noise at these levels can mask the calls birds and frogs use to attract mates, defend territories, and warn of predators. For example, songbirds exposed to 61 dBA traffic noise reduced their foraging and increased their vigilance, and used migration stopover habitat less efficiently.[117] The DEIR measured noise only in A-weighted decibels designed for human hearing, and it did not evaluate a single wildlife species.

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[112] *Id.*, pp. 4.3-5 – 4.3-6, Table 4.3-2.

[113] *Id.,* p. 4.1-20.

[114] *Id.,* p. 4.2-20. The Save the American River Association ("SARA") asked the District during scoping to model "stadium event noise and vibration at Parkway receptors." DEIR App. A, SARA letter (Feb. 4, 2026), p. 4 [PDF p. 158. Two residents who live about half a mile away, on the south side of the river, report that they already hear afternoon and evening practices and events at the school. *Id.*, emails from Peter Spaulding (Feb. 2, 2026), PDF p. 126, and msr92926@gmail.com (Feb. 4, 2026), PDF p. 120.

[115] DEIR pp. 4.2-20, 3-9.

[116] The report also says the point-source method underestimates noise on the American River Parkway. See Exh. C, Watry Report, § 4.1, comment 2, pp. 5–6. It also recommends the home-side wall specifically to reduce transmission to the Parkway. Id., § 5.4.2, p. 10.

[117] *See* Exh. B – Smallwood Report, pp. 50–52, citing Ware et al. (2015) and Francis and Barber (2013).

Lighting is treated the same way. The DEIR asserts there would be "no light trespass off the project site and within the Parkway."[118] But that modeling addresses only ground illumination. It does not address the skyglow and glare from luminaires that the DEIR concedes would be visible from the Parkway.[119] Dr. Smallwood's nighttime surveys found that light from the campus already penetrates the riparian forest.[120] The DEIR's only source on lighting and birds concerns the cruising altitude of migrating birds.[121] Birds stopping over in the Parkway corridor during fall migration, which coincides with football season, are not flying at that altitude. O4-76

The study area must encompass the off-site habitat in which indirect effects could reasonably occur, including the grassland, riparian, lagoon, wetland, and movement areas south of the levee.

The reasoning that mobile animals can move away from disturbance does not itself establish that habitat function, movement, nesting, foraging, or refuge will remain unaffected. Nor does the absence of habitat removal establish no effect on riparian habitat where the concern is repeated indirect disturbance. The DEIR should evaluate the frequency, timing, magnitude, and combined effect of light, amplified sound, crowds, and traffic on species using the Parkway corridor.

The DEIR acknowledges that the Parkway is an established wildlife movement corridor.[122] It nevertheless concludes that the Project "would not substantially interfere with the movement of any native or migratory fish or wildlife species."[123] That conclusion does not account for the movement Dr. Smallwood observed between the athletic fields and the Parkway, by flocks of birds, raptors, bats, a bobcat, and other mammals.[124] Nor does it account for more spectators and other visitors entering the Parkway at night before and after events.[125] O4-77

The DEIR also makes no attempt to estimate the loss of wildlife productivity in the Parkway habitat that Project lighting, noise, and nighttime human activity would degrade. Using nest densities from his own surveys and published studies of similar habitat, Dr. O4-78

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118 DEIR p. 4.2-18.

119 *Id.* at p. 6-7.

120 *See* Exh. B – Smallwood Report, pp. 5, 53.

121 DEIR p. 4.2-19.

122 Residents reported the same use during scoping. One resident reported bobcats, gray foxes, and coyotes next to the stadium, and elderberry shrubs, habitat for the valley elderberry longhorn beetle, "on the landside of the levee next to the football field." *See* DEIR App. A, email from Joy Nishida (Feb. 6, 2026), PDF pp. 90-91.

123 DEIR p. 4.2-24.

124 *See* Exh. B – Smallwood Report, pp. 5, 36–38, 50–54.

125 *Id.* at pp. 5, 54, 61.

Smallwood estimates the following for the roughly 11 acres of grassland, woodland, and riparian woodland within 500 feet of the athletic fields:

- about 289 bird nest sites;
- a productive capacity of about 1,300 birds per year.

If the Project degraded 20 to 40 percent of that capacity, the loss would be roughly 260 to 520 birds each year.[126]

O4-78 (Cont.)

4. The DEIR Does Not Acknowledge the Ongoing Potential Presence of Nesting Birds.

O4-79

The DEIR also omits direct, site-specific evidence that birds use the stadium itself. In 2019, a pair of killdeer established a nest containing four eggs in the end zone of the newly installed artificial field, delaying its opening.[127] That occurrence contradicts any generalized assumption that routine disturbance or artificial turf makes ground nesting at the site unlikely. Appendix C also recorded a juvenile red-tailed hawk "calling nonstop" from a redwood on the campus in late July.[128]

The revised analysis should disclose these and any other relevant occurrences and adopt enforceable nesting-bird protections applicable to construction, use, field preparation, maintenance, and other potentially disturbing activities. Those protections should include seasonal avoidance where feasible; surveys by a qualified biologist within a defined period before activity begins; renewed surveys after material work interruptions; species- and site-specific avoidance buffers established by the biologist; monitoring until the nest is no longer active and dependent young have left the area; and mandatory stop-work and corrective-action procedures if an active nest is discovered.

These protections are not hypothetical. Construction is scheduled for the summer of 2027, beginning in June, within the February 1 to September 15 nesting period that Mitigation Measure 4.2-1e itself recognizes.[129] Dr. Smallwood observed courtship, breeding pairs, and a hen mallard with chicks within the Parkway habitat south of the sports field.[130] Yet the measure assigns the surveys to "a qualified biologist," to be completed within three days before construction. It also leaves buffer distances to that biologist's discretion, without objective

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126 *See* Exh. B – Smallwood Report, pp. 53–54.

127 *See* The Sacramento Bee, *This Sacramento-area high school's football field won't open on time — thanks to some birds*, April 6, 2019, available at: https://www.sacbee.com/news/local/article228898164.html.

128 DEIR App. C, p. 4.

129 *Id.*, pp. 3-10, 4.2-16 – 4.2-23.

130 *See* Exh. B – Smallwood Report, pp. 6, 9–10, 14 (Photos 4–7, 16–17).

criteria.[131] The measure should specify survey effort sufficient to find nests across the buffer area, objective buffer standards, and public reporting.

O4-79 (Cont.)

5. The Parkway Plan and the agency that administers it.

O4-80

The Parkway is the corridor of a river that both the State and the federal government have designated as wild and scenic. The Legislature placed the Lower American River, from Nimbus Dam to its junction with the Sacramento River, in the California Wild and Scenic Rivers System in 1972. On the Governor's application, the Secretary of the Interior added the same 23-mile reach to the National Wild and Scenic Rivers System on January 19, 1981, as a state-administered recreational river, and the Ninth Circuit upheld that designation.[132] Federal river managers identified recreation and the anadromous fishery as the river's "outstandingly remarkable" values, and the DEIR acknowledges that the Parkway Plan serves as the management plan under both the federal and state Acts.[133] Both Acts protect the river together with its immediate environment. The state Act preserves rivers that possess "extraordinary scenic, recreational, fishery, or wildlife values" in their free-flowing state, "together with their immediate environments." Congress likewise declared that designated rivers "and their immediate environments shall be protected for the benefit and enjoyment of present and future generations," and that each "shall be administered in such manner as to protect and enhance the values which caused it to be included in said system."[134] The Ninth Circuit applies that mandate as "a nondegradation and enhancement policy for all designated river areas, regardless of classification," and has held legally deficient a management approach that "requires management action only when degradation has already occurred."[135] Nor do those protections end at the boundary line. In a case arising from the same 1981 designation, the Ninth Circuit rejected the argument that the Act was not implicated by a timber sale on lands a quarter mile from the river, because the sale, "whether conducted on land within the river area's boundaries or adjacent to the river area, will impact protected values."[136] The DEIR

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131 *See id.* at pp. 59–60.

132 Pub. Resources Code, §§ 5093.50, 5093.54, subd. (e); 16 U.S.C. § 1273(a)(ii), (b)(3); U.S. Dept. of the Interior, Approval for Inclusion in the National Wild and Scenic Rivers System as State Administered Components, 46 Fed. Reg. 7484 (Jan. 23, 1981); *County of Del Norte v. United States* (9th Cir. 1984) 732 F.2d 1462, 1467-1468, cert. den. (1985) 469 U.S. 1189; *see* DEIR, pp. 4.1-11 – 4.1-12; National Wild and Scenic Rivers System, American (Lower) River <https://www.rivers.gov/river/american> (designated Jan. 19, 1981; 23 miles, recreational).

133 DEIR, pp. 4.1-14, 4.2-13, 5.9-30; see National Wild and Scenic Rivers System, American (Lower) River, supra (outstandingly remarkable values: fish and recreation).

134 Pub. Resources Code, § 5093.50; 16 U.S.C. §§ 1271, 1281(a).

135 *Friends of Yosemite Valley v. Kempthorne* (9th Cir. 2008) 520 F.3d 1024, 1028 [quoting *National Wild and Scenic Rivers System; Final Revised Guidelines for Eligibility, Classification and Management of River Areas*, 47 Fed. Reg. 39,454, 39,458 (Sept. 7, 1982)]; see *Friends of Yosemite Valley v. Norton* (9th Cir. 2003) 348 F.3d 789, 799-800; *Oregon Natural Desert Assn. v. Green* (D.Or. 1997) 953 F.Supp. 1133, 1144-1146 [river management plan violated the Act where the record showed that continued grazing was degrading the river's values].

136 *Wilderness Society v. Tyrrel* (9th Cir. 1990) 918 F.2d 813, 815-818 [South Fork Trinity River, designated by the same Secretarial action, 46 Fed. Reg. 7484]; see 16 U.S.C. § 1283(a) [federal agencies with jurisdiction over lands that "include, border upon, or are adjacent to" a designated river must act "to protect such rivers"].

O4-80 (Cont.)

itself states that the federal and state designations "require that any project in its immediate environment protect the river's free-flowing condition and 'outstandingly remarkable' scenic and recreational values."[137] Yet its biological analysis reasons that because wild and scenic management plans focus on lands within a river's boundaries, the Parkway Plan's policies "do not directly apply" to a project whose 80-foot light standards would stand about 175 feet from the Parkway.[138] The DEIR cannot have it both ways. The Final EIR should treat the river's federal and state designations as part of the environmental setting, give them the special emphasis CEQA requires for resources that are rare or unique to the region, and evaluate the Project's light, noise, and nighttime activity against the values those designations protect.[139]

Relevant American River Parkway Plan policies call for protection of habitat connectivity and wildlife travel corridors, mitigation of adverse effects from adjacent land uses, protection of Parkway plants and wildlife, and continued protection of the Rio Americano wetland/lagoon area.[140] The Final EIR must also substantively address the February 4, 2026 Sacramento County Regional Parks submittal and other agency comments concerning the geographic scope of the biological analysis and protection of Parkway resources.

O4-81

Sacramento County Regional Parks, the agency "primarily responsible for administering the Parkway Plan," told the District during scoping that "[a]s currently proposed, the RAHS Stadium Improvements would adversely impact the aesthetic and biological values of the Wild and Scenic Parkway." It explained that Project lighting and noise would disrupt wildlife, and that these impacts "are especially critical given the project's location adjacent to the Parkway's narrowest reach, where the wildlife corridor bottlenecks for approximately six miles." It asked the EIR to evaluate "a substantial woodland buffer on the campus boundary."[141] The DEIR reaches the opposite conclusions without acknowledging the agency's findings.

- It finds the Project's effects on the Parkway viewshed less than significant, and its light and glare effects less than significant with mitigation.[142]
- It never mentions the corridor bottleneck or the 2023 Natural Resources Management Plan that Regional Parks cites.

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137 DEIR, p. 5.9-30.

138 DEIR, pp. 3-4 (four 80-foot light standards), 4.1-14 (about 175 and 435 feet from the Parkway), 4.2-13, 4.2-26 – 4.2-27.

139 CEQA Guidelines, § 15125, subds. (c), (d).

140 Parkway Plan Policies 3.3, 7.19, 7.19.1, 7.22.1, 10.27, and 10.28.

141 DEIR App. A, letter from Liz Bellas, Director, Sacramento County Regional Parks (Feb. 4, 2026), p. 1 [PDF p. 151].

142 DEIR, pp. 4.1-18, 4.1-26.

- Its only buffer is the 100-foot landscape strip in Alternative 2, which faces residences to the north and east.[143] It does not consider a woodland buffer between the existing site and the Parkway.

O4-81 (Cont.)

Where a public agency with jurisdiction over the affected resource disagrees, the EIR must summarize the main points of disagreement, and the Final EIR must respond with good-faith, reasoned analysis. [144]

Dr. Smallwood's surveys show what those policies protect here. The surveys recorded northwestern pond turtle, a breeding pair of wood ducks, a mallard with chicks, signs of beaver, mule deer, and diving and wading birds in and around the lagoon area in the Parkway just south of the sports field.[145]

6. Recommendations for biological resources analysis and mitigation.

O4-82

Dr. Smallwood concludes that the DEIR mischaracterizes the existing environmental setting. It treats the Parkway's wildlife community as separate from the campus although the same animals use both. Its characterization of wildlife rests on a single bat-survey memorandum and on a database query that screened most special-status species out of the analysis. And the DEIR provides no analysis of how Project noise and lighting would affect wildlife in the adjoining Parkway habitat.

The Smallwood report undermines the DEIR's unsupported assumptions that the open space south of the levee may be excluded from meaningful investigation and that indirect lighting, noise, crowd, and traffic effects will not impair habitat functions. The Final EIR must address the observations and opinions individually, expand its study area as appropriate, and revise its impact analysis and mitigation where the submitted evidence conflicts with the DEIR's assumptions or conclusions.

Dr. Smallwood recommends that the District:

O4-83

1. conduct surveys of the Parkway habitat south of the levee across the seasons, including nighttime acoustic bat surveys with vetted identifications, before characterizing the wildlife community or concluding that impacts would be insignificant;

2. analyze Project noise and lighting effects on the species the surveys show are present;

O4-84

3. require the elderberry avoidance measure to include reporting on implementation and defined consequences for noncompliance (Smallwood [p. 58]);

O4-85

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143 *Id.* at p. 6-5.

144 CEQA Guidelines, § 15151; *see also id.* at § 15088, subd. (c).

145 *See* Exh. B -- Smallwood Report, pp. 5, 7, 9, 14, 16 (Photos 3, 6–7, 16–17, 21) & Table 1 (pp. 27–29).

4. require nesting-bird surveys with effort proportionate to the number of nests the habitat supports, and objective buffer criteria (id. [pp. 59–60]); and O4-86

5. use lamps of 3,000 K or less, or amber lamps, with no color-changing show lighting or upward-aimed fixtures, and full shielding toward the Parkway; O4-87

6. turn the stadium lights off within a fixed time after each event, and cap the number of lit nights; O4-88

7. set a noise limit at the nearest Parkway trees and shrubs; O4-89

8. protect the tree row along the south edge of the athletic fields, and replace trees as they decline with native species tall and dense enough to screen light and noise; O4-90

9. adopt enforceable measures to keep event attendees out of the Parkway and the lagoon area after dark; and O4-91

10. monitor bat activity before and after construction at two fixed stations, and require further mitigation, which could include habitat protection, if passage rates fall 20 percent or two species are lost in any year.[146] O4-92

The District should follow the above recommendations. Additionally, the Final EIR should revise the biological-resources analysis to: O4-93

1. Clearly map and explain the biological study and field-survey areas, including any portions of the Parkway that were excluded and the scientific basis for each boundary;

2. Expand the study area to include the open space immediately south of the levee and all grassland, riparian, wetland, lagoon, and wildlife-movement habitat that may be affected by Project lighting, noise, construction, drainage, or increased day and nighttime activity; O4-94

3. Conduct appropriately timed and designed field surveys of that expanded area for nesting and migratory birds, bats and potential roosts, northwestern pond turtles, and other sensitive species or habitats identified through database review, agency consultation, or documented observations; O4-95

4. Evaluate direct, indirect, and cumulative effects on habitat use, foraging, nesting, roosting, wildlife movement, and habitat connectivity; and O4-96

5. Reconsider the DEIR's significance conclusions and adopt enforceable mitigation based on the resulting evidence, including operational restrictions and monitoring where necessary. O4-97

[146] *See* Exh. B – Smallwood Report, pp. 1–3, 36–61.

C. Noise and Vibration

O4-98

The DEIR concludes that construction noise and intermittent stadium-event noise would remain significant and unavoidable after mitigation.[147] It predicts that high-attendance events could increase nighttime noise at nearby residences by approximately 2 to 15 dBA Leq over measured ambient conditions.[148] These findings require the District to identify and adopt all feasible mitigation measures, evaluate alternatives capable of avoiding or substantially reducing the construction or operational impact, and support any statement of overriding considerations with substantial evidence.

O4-99

1. The DEIR's screening method understates event noise.

In support of these comments, RACA submits the expert report of Derek Watry, M.S., M.B.A., Technical Director at Wilson Ihrig/RWDI. Mr. Watry reviewed Section 4.3 of the DEIR, the Project Description, Appendix D, the mitigation measures summarized in Table 1-1, and the reference measurements from the August 29, 2025 El Camino High School game.[149] Mr. Watry concludes that, although the DEIR finds noise impacts significant and unavoidable, it "does not properly convey to the public the degradation that would come to the currently quiet nighttime environment in the area surrounding" the sports field.[150]

The DEIR's operational analysis rests on a screening calculation that the DEIR itself qualifies. It takes measurements made roughly 50 feet from the crowd and public-address system at a single El Camino High School game, treats the entire bleacher, crowd, and PA area as a single point located 350 feet from the nearest eastern residence, and applies point-source attenuation of 6 dB per doubling of distance.[151] The DEIR concedes that "portions of the bleachers would extend closer to the eastern property line than this center-point distance," that event noise "includes multiple sources distributed across the bleachers and field area," and that "actual attenuation could vary from this screening estimate."[152]

RACA's acoustical expert explains why that method understates noise at nearby homes. A meter 50 feet from the edge of a bleacher captures sound from the nearest spectators, while the rest of the crowd contributes little. At the distance of the nearest homes, the full crowd contributes.[153] Mr. Watry concludes that the bleachers and band should have been analyzed as area sources, and that treating them as point sources "prejudicially underestimates the noise

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147 DEIR, pp. 4.3-26 – 4.3-27.

148 *Id.* at p. 4.3-24.

149 *See* Exh. C – Watry Report, §§ 3–5, pp. 2–10.

150 *Id.*, § 6, p. 11.

151 *See* DEIR, pp. 4.3-14, 4.3-23 – 4.3-24.

152 *See id.* at pp. 4.3-23 – 4.3-24.

153 *See* Exh. C – Watry Report, § 4.1, comment 2, p. 5.

levels at nearby residences and the American River Parkway."[154] The DEIR also does not disclose where the El Camino measurements were taken or what sources each one captured, including whether the band was playing.[155] Appendix D's short-term meter records leave every location and note field blank, and its long-term data sheets identify sites only by number.[156] O4-100

The DEIR's distances compound the problem. The air-quality section places the closest residence "approximately 50 feet northeast of the stadium."[157] The construction analysis is internally inconsistent in the same way. It states that equipment would operate "approximately 150 feet or more" from the closest eastern residences, yet its vibration analysis uses 50 feet to the same homes.[158] At 50 feet, the DEIR's own construction reference level of 86 dBA Leq would reach those homes directly, about 9 dB more than the 77 dBA the DEIR reports.[159] O4-101

The DEIR also understates its own reference data. The Leq values it reports for the two long-term El Camino locations, 64.7 and 74.8 dBA, are not even averages of the hours measured. Appendix D's summary sheets spread the sound energy of the six measured hours (4:00 to 10:00 p.m.) over the fifteen-hour daytime period, as though the other nine hours had been silent.[160] The six measured hours actually average about 68.7 and 78.7 dBA Leq, and the three game hours about 70.8 and 80.9 dBA. The DEIR's "maximum" levels, 87.9 and 92.7 dBA Lmax, are arithmetic averages of the hourly maxima; the actual maxima were 96.0 and 99.5 dBA.[161] The DEIR also asserts that the short-term samples taken during the game "better represent game-period noise conditions."[162] They do not. The long-term meters recorded higher levels during the game than any short-term sample.[163] O4-102

The DEIR acknowledges that these values "may understate noise levels during the active game period."[164] No measurement covers the period after 10:00 p.m., although the Project O4-103

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[154] Id., p. 5-6.

[155] Id., § 4.1, comment 3, p. 6.

[156] DEIR, App. D, pp. 2–21.

[157] *See id.* at pp. 4.3-23 – 4.3-24, 5.2-7.

[158] *See id.* at p. 4.3-17; id. at p. 4.3-27 (Table 4.3-18).

[159] *See id.* at p. 4.3-17 (Table 4.3-13 & notes).

[160] *See id.* at p. 4.3-23; App. D, pp. 4–5. The energy average of the six hourly Leq values at LT-01, spread over fifteen hours, is 64.8 dBA; over the six measured hours it is 68.7 dBA. The corresponding LT-02 values are 74.8 and 78.7 dBA. Mr. Watry also finds the DEIR's figures in error; the 66.7 and 76.4 dBA values in his table are arithmetic means of the hourly values. Decibels must be averaged on an energy basis, which yields the higher figures above. See Exh. C, Watry Report, § 4.1, comment 1, p. 4.

[161] App. D, pp. 4–5 ("Uppermost-Level"); *see* Exh. C – Watry Report, § 4.1, comment 1, p. 4.

[162] DEIR p. 4.3-9.

[163] *Compare* App. D, pp. 4–5 (84.1 dBA Leq and 99.5 dBA Lmax, 8:00 p.m. hour) *with* DEIR p. 4.3-9 (short-term samples of 66.3–77.7 dBA Leq and 78.7–89.7 dBA Lmax); *see also* Exh. C – Watry Report, § 4.1, p. 4.

[164] *See id.* at p. 4.3-9.

allows play until 11:00 p.m. and another 30 minutes of egress and cleanup.[165] During the game, the same meters recorded hourly levels of up to 72.6 dBA Leq and 96.0 dBA Lmax behind the bleachers at the residential fence line, and up to 84.1 dBA Leq and 99.5 dBA Lmax near the announcer booth.[166] Applying the DEIR's own 17-dB distance adjustment to the game-hour data yields about 51 to 67 dBA Leq and 72 to 83 dBA Lmax at the nearest eastern residence. Mr. Watry reaches the same result for the homes on Whitehall Way: 67.1 dBA Leq and 82.5 dBA Lmax.[167] That is up to 6 dB (Leq) and 7 dB (Lmax) more than the DEIR discloses, and up to 21 dB above the 46 dBA ambient level the DEIR uses.[168] The DEIR even reports the reference game's attendance three ways:

O4-103 (Cont.)

- about 3,000 (p. 4.2-20),
- about 3,300 (p. 4.3-9), and
- about 3,400 (p. 4.3-23).

2. Event noise would exceed the County standards the DEIR adopts.

O4-104

The DEIR adopts the County Noise Element standards as its significance thresholds "regardless of the District's exemption" from them (DEIR p. 4.3-15), but it never compares predicted event noise with those standards. It compares event noise only with ambient levels. For residential outdoor areas, the standards are 55 dBA L50 and 75 dBA Lmax by day and 50 dBA L50 and 70 dBA Lmax at night. Each is reduced by 5 dB "for sounds consisting primarily of speech or music."[169] For PA announcements, band music, and cheering, the limits are therefore 70 dBA Lmax until 10:00 p.m. and 65 dBA Lmax after 10:00 p.m.[170]

The DEIR's own predicted maximum levels at the nearest home (62 to 76 dBA Lmax) exceed the first limit by up to 6 dB and the second by up to 11 dB.[171] The game-hour data in Appendix D (72 to 83 dBA Lmax at 350 feet) exceed the pre-10:00 p.m. limit in every hour of the game. Median (L50) levels would also exceed the standards. Appendix D's long-term data sheets transpose the L50 and L90 columns: every "L90" value is higher than the "L50" value beside it, which is impossible by definition.[172] Read correctly, the game-hour L50 values translate to about 49 to 60 dBA at the nearest homes after the DEIR's 17-dB adjustment. That

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[165] *See id.* at p. 3-7; *see also* DEIR, App. D, pp. 4–5, 12–14.

[166] App. D, pp. 4–5.

[167] *See* Exh. C – Watry Report, § 4.1, p. 4.

[168] *Compare ibid. with* DEIR p. 4.3-24.

[169] DEIR p. 4.3-13, Table 4.3-10 & note 1.

[170] The 5 dBA adjustment for ambient noise does not apply here. The DEIR's long-term measurement next to the eastern residences recorded maximum levels of 66 dBA by day and 54 dBA at night, below both limits. *See* DEIR p. 4.3-3 (Table 4.3-1); id. at p. 4.3-13 (Table 4.3-10, note 1).

[171] *See id.* at p. 4.3-24.

[172] *Id.* at App. D, pp. 4–5; *see* Exh. C – Watry Report, § 4.1, n. 2, p. 5.

reaches or exceeds the 50 dBA standard for speech and music at both long-term locations. Near the PA system, it also exceeds the 55 dBA standard that applies without that adjustment.[173]

O4-104 (Cont.)

Football games may continue until 11:00 p.m., with lighting for another 30 minutes of egress (DEIR p. 3-7). After 10:00 p.m., Mitigation Measure 4.3-1b silences only the PA system, amplified music, and the band (DEIR p. 4.3-26). Crowd noise, bleacher noise, and departing spectators remain subject to the stricter nighttime limits. Because the DEIR treats these standards as its thresholds, the extent of the exceedance is the measure of severity the public and the Board need, even for an impact the DEIR labels significant and unavoidable.[174]

O4-105

The DEIR's 70 dBA Lmax standard governs only public-address sound; it does not cap total event noise from crowds, bands, whistles, bleachers, or vehicles.[175] That limit equals the County's pre-10:00 p.m. limit for speech and music and exceeds its post-10:00 p.m. limit by 5 dB. Nor does a daytime PA sound check adequately demonstrate compliance during the lower nighttime ambient conditions when the claimed impact occurs. The Final EIR must disclose and evaluate the raw monitoring data, event attendance and duration, source levels, weather conditions, receptor geometry, barriers, treatment of Leq, L50, Lmax, and low-frequency noise, and the full reasonably foreseeable operating program, including practices, games, playoffs, non-athletic events, band use, cleanup, egress, and exceptions to ordinary hours.

O4-106

The DEIR also sets aside an exceedance it admits. Peak-hour event traffic would raise roadway noise by 0.2 to 1.7 dB for a typical event and by 0.4 to 2 dB for a peak event. The DEIR concedes that this "exceeds the +1 dB standard" of the County General Plan, then dismisses the exceedance because it occurs at the peak hour rather than as a long-term average.[176] An exceedance cannot be excused because it occurs when the impact actually happens. Residents already experience this effect after existing events. A neighbor at American River Drive and Saverien Drive reported that on Friday, January 30, 2026, at about 9:30 p.m., "traffic noise in our area was significantly louder than normal as attendees departed an event," and that "[y]oung drivers leaving in the dark often accelerate aggressively and speed."[177] The DEIR's traffic-noise model reports hourly and daily averages, which do not capture these departure surges.

O4-107

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[173] App. D, pp. 4–5 (LT-01: 66.1 and 67.4 dBA; LT-02: 76.9 and 76.6 dBA, 7:00 and 8:00 p.m. hours, in the columns labeled "L90"); DEIR pp. 4.3-13 (Table 4.3-10 & note 1), 4.3-24; *see* Exh. C – Watry Report, § 4.1, pp. 4-5. The interior standard would also be exceeded during the louder game and event hours. That standard is 55 dBA Lmax, or 50 dBA for speech or music, measured with windows closed (DEIR p. 4.3-13, note 3). Using the DEIR's 25-dB closed-window reduction (DEIR p. 4.3-17), the game-hour levels yield interior maxima of about 47 to 58 dBA.

[174] *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 514, 519; CEQA Guidelines § 15151.

[175] *See* DEIR, pp. 1-11 – 1-12, 4.3-25. As Mr. Watry notes, the system's actual output will depend on the announcers' vocal effort and the compression of recorded playback, not just on the settings fixed at a one-time sound check. *See* Exh. C, Watry, § 5.1, pp. 7-8.

[176] Id. at pp. 4.3-20, 4.3-22.

[177] Id. at App. A, email from Brooke Banks (Feb. 6, 2026), PDF pp. 45-47.

The DEIR finds post-event parking-lot noise less than significant because it would reach 47 dBA Leq at the nearest residence, 1 dB above the nighttime ambient level.[178] Door slams, engine starts, and voices are single events that an hourly average conceals.[179] The DEIR reports no maximum level for parking activity and does not compare one with the 65 to 70 dBA Lmax standards discussed above. The analysis also considers only the campus lots, about 350 feet from the nearest home. The transportation analysis sends 151 vehicles at a typical game to curbside parking on American River Drive and Saverien Drive, in front of homes. At a peak event, 623 vehicles would not fit on campus; the analysis fills all 327 nearby curb spaces and sends the rest to Jesuit High School or to other residential streets within a half-mile walk.[180] Those cars would park about 50 feet from homes, not the 350 feet the DEIR assumes for the campus lots. The noise analysis never considers door slams, engine starts, voices, and car audio at those curbs late at night, which Mr. Watry identifies as foreseeable departure noise the DEIR omits.[181] It also limits the condition to "five to eight times per year," although Table 3-1 includes graduation and up to four other events of 1,500 to 3,000 people.[182] O4-108

3. Bleacher noise is not analyzed. O4-109

The DEIR does not analyze noise from spectators stomping on the new metal bleachers, which will seat about 2,575 people.[183] RACA, the Save the American River Association ("SARA"), and several residents asked the District to evaluate this source during scoping.[184] SARA requested "a quantitative evaluation of vibration and structure-borne noise associated with bleacher seating during events."[185] The DEIR acknowledges the source only obliquely. Mitigation Measure 4.3-1b calls for features to address "footfall or vibration-related noise," and the significance discussion lists "bleacher activity" among sources that "cannot be fully controlled through feasible mitigation."[186] Yet the vibration analysis states that the Project "would not include any long-term operational vibration sources."[187]

Mr. Watry explains that stomping on metal bleacher decks is a familiar rallying tactic, that a small number of spectators stomping in unison can excite the entire structure, and that

[178] DEIR pp. 4.3-19 – 4.3-20.

[179] *See* Exh. C, Watry Report, § 4.3, p. 7.

[180] DEIR App. E, pp. 13–16 & Tables 14–17 (PDF pp. 14–17)

[181] *See* Exh. C – Watry Report, §§ 2, 4.3, pp. 2, 7.

[182] DEIR, pp. 3-9, 4.3-20.

[183] Id. at pp. 3-4, 3-8.

[184] Id. at App. A: RACA letter (Feb. 4, 2026), PDF pp. 22-27.

[185] *See id.*, SARA letter (Feb. 4, 2026), p. 2 [PDF p. 156]; *see also id.*, emails from Barbara Dugal (Feb. 4, 2026), Elizabeth Hughes (Feb. 3, 2026), Joe Selewicz (Feb. 5, 2026), Darlene Vaira (Feb. 5, 2026), and Brooke Banks (Feb. 6, 2026).

[186] Id. at pp. 4.3-26, 4.3-27.

[187] Id. at p. 4.3-27.

the resulting noise can and should be quantified.[188] Without that analysis, there is "no way to assess how much 'sound-deadening treatment' is actually required," which leaves the measure "nearly toothless." The problem is compounded by an exception that lets the District forgo treatment of step surfaces it deems infeasible.[189] The Final EIR must quantify bleacher stomping and structure-borne noise, disclose the results, and adopt the treatments described below.

O4-109 (Cont.)

4. The District Should Consider Feasible Mitigation for Noise Impacts.

O4-110

Mr. Watry recommends that the District:

(1) install a remote noise-monitoring system for at least the first full season. The system would monitor noise levels continuously, publish the measured levels on a public website, alert designated staff automatically, and record audio whenever a trigger level is exceeded, similar to the system his firm has overseen at Levi's Stadium in Santa Clara;[190]

(2) program that system with a lower trigger level after 10:00 p.m. to document any PA use after the curfew, and use it to detect prohibited noisemakers;[191]

(3) apply a damping compound or sound deadener, such as Kinetics KDC-E-162 or KDD-3642 or QuietCoat 118, to the undersides of the bleacher seats and floorboards. Mr. Watry expects these treatments to reduce stomping noise by 5 to 15 dB, with the product confirmed by testing on an actual metal bleacher. Because the treatments are applied to the undersides, the durability, weather-exposure, maintenance, and safety grounds the DEIR cites for infeasibility would not apply;[192] and

(4) build absorptive masonry walls, faced with a durable exterior sound-absorbing material such as Acoustement 40, rising 3 feet above the floorboards at the northeast ends of both bleachers and along the adjoining part of the back of the visitor bleachers, to absorb bleacher and crowd noise and redirect it away from the residences and the Parkway.[193]

The District must adopt all feasible, enforceable noise-reduction measures identified through the revised analysis. Those measures should include, as supported by the evidence:

O4-111

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188 *See* Exh. C – Watry Report, § 4.2, pp. 6-7.

189 *See ibid.*; *see also* DEIR p. 4.3-26.

190 *See id.*, § 5.1, pp. 7-8.

191 *See id.*, §§ 5.2 – 5.3, p. 8.

192 *See id.*, § 5.4.1, p. 9.

193 *See id.*, § 5.4.2 & fig. 1, pp. 9–10.

- a total-event noise standard at the nearest residential property line equal to the County standards the DEIR adopts (70 dBA Lmax before 10:00 p.m. and 65 dBA Lmax after), verified by monitoring during actual events;
- remote noise monitoring with public reporting and automatic alerts;
- damping of the bleacher decks and seats;
- absorptive walls at the bleachers;
- firm attendance and event limits;
- earlier hard curfews;
- limits on amplified sound, bands, and PA output;
- speaker orientation or relocation;
- post-installation nighttime testing during representative events;
- a documented complaint-response process; and
- corrective-action thresholds that require additional controls when measured noise exceeds the standard.

O4-112

The District must not rely on undefined future "feasibility" determinations or voluntary measures to support its conclusion.

5. The Analysis of Construction Noise Impacts Requires Revision.

O4-113

The DEIR uses inconsistent construction schedules. The Project Description and transportation analysis state that construction would occur between 7:00 a.m. and 4:00 p.m. on weekdays, primarily during the summer.[194] The DEIR also gives the construction period as 12 weeks, three to four months, and "several weeks."[195] Mitigation Measure 4.3-1a, however, would permit construction until 7:00 p.m. Monday through Saturday and from 9:00 a.m. until 5:00 p.m. on Sunday.[196] A mitigation measure cannot silently enlarge the construction program beyond the schedule used to analyze the Project's noise, traffic, air-quality, and neighborhood effects. The District should either make the narrower weekday schedule an enforceable Project condition or revise the Project Description to accurately describe the longer weekday and weekend construction schedule.

O4-114

The construction-noise analysis also lacks support. Appendix D contains no equipment list or model output for the 86 dBA reference level. Mitigation Measure 4.3-1a's 150-foot setback for stationary equipment and staging equals the distance already assumed in the unmitigated calculation, so it yields no reduction, and the DEIR concedes that construction noise would still reach about 77 dBA after mitigation.[197] The Final EIR should disclose the equipment assumptions, resolve the distance conflict, and evaluate the equipment controls the District adopted in 2010 (Section II.G.3).

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[194] *See* DEIR, p. 3-10.

[195] *See id.* at pp. 3-10, 4.4-8—4.4-9, 4.4-17, 5.4-15, 7-7.

[196] *See id.* at p. 4.3-24.

[197] *See id.* at pp. 4.3-17, 4.3-24 – 4.3-26.

D. Traffic, Parking, Pedestrian and Bicycle Safety, Queuing, and Emergency Access

O4-115

The transportation section acknowledges that a 2,200-person event would require approximately 823 parking spaces and that a 3,400-person event would create a residual demand for roughly 296 spaces even after counting identified on-street parking. It also predicts a westbound left-turn queue at Fair Oaks Boulevard and Saverien Drive of approximately 615 feet for a general event and 1,055 feet for a peak event, compared with approximately 195 feet of painted storage.[198] Those conditions are not rendered insignificant merely because they occur intermittently or outside the ordinary commuter peak.

O4-116

The DEIR also rejects the one remedy its own traffic consultant proposed for that queue. The LTA recommends event signal timing and removal of the concrete median ahead of the westbound left-turn pocket, so that vehicles could queue in the existing two-way left-turn lane rather than in the westbound through lane, and it recommends the median removal because of "general events, like reoccurring football games." The DEIR declines it as not "appropriate or necessary to address the very limited number of new peak-attendance events." But the 615-foot queue, more than three times the 195-foot pocket, is the LTA's projection for the general event, which would occur at every typical home game. The Final EIR should adopt the LTA's measure or explain, with evidence, why a queue extending into the westbound through lanes at every home game would not create a hazard.[199]

O4-117

The DEIR's traffic projections also rest on attendance figures that are not conservative. The 3,400-person "conservative event" is the crowd actually recorded at one Rio Americano home game: the 2025 game against Jesuit, played at El Camino High School. The District's ticket data show at least 3,397 attendees, more than the 3,301 the LTA and the VMT memorandum use.[200] That figure is a measurement from an off-campus venue, not a ceiling for games on Rio Americano's own campus, where the new bleachers alone would seat 2,575.[201] The 2,200-person "general event" has no stated derivation. The LTA takes the 1,669-person average from the ticket data and raises it by about a third because on-campus games would be "more readily accessible," without explaining the size of the increase. It then describes the result as "based on existing ticket data."[202] Mr. Johnson agrees that on-campus games would draw more people than games at El Camino, but concludes that the LTA's 2,200 figure still understates attendance. El Camino has 430 parking spaces, with no-stopping signs on El Camino and Eastern Avenues for more than a mile in each direction. Rio Americano offers 672 campus spaces and, after 4:00 p.m., 327 street spaces. In his opinion, the Rio Americano–Jesuit game, with 3,197 tickets sold, is the appropriate design event, and the Project's trip generation

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[198] *See id.*, pp. 4.4-12 – 4.4-14. Appendix E, the Local Transportation Analysis upon which the DEIR relies, is labeled a "DRAFT." *See* App. E (LTA), p. 1. The Final EIR should substitute the final version of this document for this version labeled draft and must recirculate the DEIR if the final version reveals significant new information.

[199] *See id.* at pp. 4.4-14, 4.4-16 – 4.4-17; App. E, LTA, pp. 12, 18 (PDF pp. 13, 19).

[200] *See id.* at App. E (LTA), PDF p. 4 and Att. C; DEIR App. F, Table 1; see DEIR p. 4.4-1 ("approximately 3,400").

[201] *See id.* at p. 4.4-1.

[202] *See id.* at App. E, PDF pp. 5, 19.

should be at least twice what the LTA assumes.[203] He concludes that drivers who find the lots full "will circle around and around until they find a space off-site," adding traffic and emissions that the DEIR does not analyze.[204] The Final EIR should derive its attendance assumptions from evidence, such as attendance at comparable on-campus stadiums, and should state how often events above the general-event level would occur. O4-117 (Cont.)

The DEIR relies on 327 on-street spaces along American River Drive and Saverien Drive, a 2.36-person vehicle-occupancy observation at El Camino, an assumed ten-percent non-driving share, and future overflow parking at Jesuit. The El Camino observation also leaves a gap the DEIR does not explain. On the night of the Rio Americano–Jesuit game, for which the District reports 3,197 tickets sold, the occupancy survey counted 564 arriving vehicles carrying 1,333 people, about two-fifths of the ticket holders. The LTA does not say how the rest reached the game, or whether 2.36 persons per vehicle describes how a crowd that size travels. Mr. Johnson also expects fewer people to carpool to games on Rio Americano's campus, where parking is easier.[205] The final analysis should demonstrate that the counted street spaces are legal, continuously available, connected by safe nighttime routes, and not needed for residents or other uses; explain whether El Camino observations transfer to this setting; and disclose the dates, conditions, and raw data for all counts. Residents' scoping comments show why that demonstration matters. Neighbors on American River Drive report that drivers already park in front of "no parking anytime" signs, in turning lanes, and across driveways during school drop-off and pick-up. They also report that during evening games, cars and trucks park so close to driveways that residents cannot turn in or put out their trash cans.[206] RACA's consultant recorded the same condition on September 4, 2026, when a Jesuit evening game drew heavy parking along American River Drive and Jacob Lane.[207] The DEIR does not ask whether the street spaces it counts are already taken when Jesuit hosts an event. Any off-site parking relied upon as mitigation should be secured before approval, with a binding fallback that limits attendance or cancels the event if parking is unavailable. O4-118

The transportation baseline also leaves out the period residents describe as the worst. The traffic counts were taken on a Friday in August 2025 from 2:30 to 6:30 p.m. They show the peak hour at every study intersection to be 3:00 to 4:00 p.m., during student pick-up at both Rio Americano and Jesuit. The analysis nevertheless uses 5:30 to 6:30 p.m. as its baseline, because events are "anticipated to typically occur later in the evening."[208] Three households reported during scoping that they had waited more than 20 minutes in traffic near their homes, at least two of them during school drop-off or pick-up, and one "within two blocks of my home, O4-119

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[203] *See* Exh. D – Johnson Report, pp. 2, 6, 11–18.

[204] *See id.*, Johnson Report, pp. 12–16.

[205] DEIR App. E, Att. C (PDF p. 57), Att. D (PDF p. 60); Exh. D – Johnson Report, pp. 4, 18.

[206] *See id.* at App. A, emails from Liyan Yu (signed by Liyan and Greg Grimm) (Feb. 3, 2026), PDF pp.76-77; Darlene Vaira (Feb. 5, 2026), PDF p. 58; and Brooke Banks (Feb. 6, 2026), PDF p. 46.

[207] Exh. A – Eagle Sight Report, § 3, p. 2; § 4, p. 3; Fig. 3.

[208] DEIR, App. E, p. 2 (PDF p. 3).

with no ability to move."[209] Yet the Project would host whole-school assemblies "during or immediately following school hours," and Table 3-1 allows up to four assemblies or community events and up to four field days of 1,500 to 3,000 people each.[210] The Final EIR should analyze the school-day peak with Project events, or make a start time after the school peak an enforceable condition for events above a stated attendance. O4-119 (Cont.)

In support of these comments, RACA submits the report of Grant Johnson, a registered traffic engineer (TR 1453) with Prism Engineering. Mr. Johnson reviewed the DEIR's transportation section, the Local Transportation Analysis (Appendix E) and the VMT memorandum (Appendix F). On Friday, April 17, 2026, a school day, he also flew drones near the campus to count traffic at the main campus intersection, parking-lot occupancy, on-street parking and the direction of school traffic, and he re-ran the LTA's analysis of the American River Drive and Saverien Drive intersection.[211] O4-120

Mr. Johnson confirmed the 3:00 to 4:00 p.m. peak in drone counts on Friday, April 17, 2026, and found Parking Lots 4 and 5 83 percent full at 2:30 p.m. and still about 77 percent full at 3:30 p.m.[212] An event held during or right after school hours could not rely on the campus parking the LTA counts. The LTA also obscures the issue. It says delay was calculated "using volumes presented in Exhibit 2."[213] Exhibit 2 is labeled "5:30 – 6:30 PM" but displays the 3:00 to 4:00 p.m. counts. At American River Drive and Saverien Drive, for example, it shows 1,135 vehicles, while the delay worksheets use 422.[214] A reader comparing the two would conclude that the analysis tested the school peak. It did not. O4-121

Mr. Johnson reached the same conclusion from the LTA's worksheets: the volumes in its delay analysis are "much lower" than those in Exhibits 2, 5 and 9 because they "actually represented the hour of 5:30 to 6:30 pm."[215] Mr. Johnson analyzed the volumes the LTA displays in its Exhibit 5, which add game traffic to the school-peak counts, using the LTA's own lane configuration. He found that the all-way stop at American River Drive and Saverien Drive would operate at level of service F, with 136 seconds of average delay per vehicle; his O4-122

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[209] DEIR App. A, emails from Brooke Banks (Feb. 6, 2026), PDF p. 46; Darlene Vaira (Feb. 5, 2026), PDF p. 58; and Prasad Rampalli and Mridula Udayagiri (Feb. 4, 2026), PDF p. 133 ["sat in traffic for over 20 minutes on American River Drive during school pick-up time, inhaling exhaust fumes while unable to move"].

[210] *See id.*, pp. 3-7, 3-9.

[211] *See* Exh. D – Johnson Report, pp. 2–10, 14, 19, 21–24 (résumé).

[212] *See id.*, pp. 4, 9.

[213] *See id.*, App. E, LTA, p. 2.

[214] *Id.*, Exh. 2; *compare id.*, Att. A (Intersection 3 count sheet, peak hour 3:00–4:00 p.m.) *with id.*, Att. B (Existing (2025) worksheet, Intersection 3).

[215] *See* Exh. D – Johnson Report, pp. 11–12, 14

calculation is attached to his report. Even on its own volumes, the LTA calls an increase in delay at that intersection from 9.3 to 34.7 seconds "nominal."[216] O4-122 (Cont.)

The DEIR states that no parking restrictions were identified along Saverien Drive.[217] American River Drive and Saverien Drive carry Class II bicycle lanes in each direction.[218] Along Saverien Drive, the curb space the LTA counts as parking is about five feet wide and lies beside a five-foot bicycle lane. Mr. Johnson concludes that many vehicles parked there would render the bicycle lanes unusable during games. A pickup truck, about eight feet wide with its mirrors, would leave a cyclist as little as two feet.[219] Mitigation Measure 4.4-3b requires the District to prevent event-related parking from "obstructing … bicycle lanes."[220] The DEIR cannot both count these spaces as parking supply and promise that parked cars will not obstruct the bicycle lanes. The Final EIR should remove from the 327-space supply every space that cannot be used without encroaching on a bicycle lane, and then redo the parking analysis. O4-123

The Event Transportation Management Plan also defers the locations and types of crossing treatments and does not establish quantitative triggers for traffic-control staffing or attendance limits. The LTA treats crossing improvements as optional because "typical campus events" other than football would not generate "substantial offsite parking along American River Drive."[221] That reasoning skips the events that matter. By the LTA's own tables, every typical home game leaves 151 vehicles without campus parking, and a peak event 623, to be parked along American River Drive and Saverien Drive, filling all 327 nearby curb spaces.[222] The only marked crossing near the campus is at Saverien Drive. There are no mid-block crossings, and the next unsignalized crossing is about 1,200 feet east.[223] Attendees who park on American River Drive will cross it after dark when games end. The Final EIR should identify those crossing locations and specify their treatments now, rather than leaving both to a later plan. O4-124

Emergency-access and evacuation conclusions rely primarily on future coordination and the existence of a street grid rather than a capacity analysis of a simultaneous campus and neighborhood evacuation. The District should consult Sacramento County transportation, Sheriff, fire, and Parkway officials and incorporate their requirements into enforceable measures. O4-125

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[216] Exh. D – Johnson Report, pp. 14–15, 19 (App. A); DEIR App. E, p. 6 [Table 4], p. 18...

[217] DEIR p. 4.4-6; DEIR App. E, p. 14 [Table 15, n. 2].

[218] *Id.* at pp. 4.4-3 – 4.4-4.

[219] *See* Exh. D – Johnson Report, pp. 14, 17.

[220] DEIR p. 4.4-15.

[221] *Id.*, App. E, LTA, p. 17.

[222] *Id.*, Tables 14–16 (PDF pp. 15–16).

[223] *Id.*, PDF p. 17.

The VMT analysis does not evaluate the full operating program described in the Project Description. Appendix F analyzes the relocation of varsity football games from El Camino High School and relies on assumptions concerning the geographic distribution of home and visiting spectators, vehicle occupancy, walking and bicycling, and students remaining on campus after school.[224] The DEIR then extends the football-game result to graduation, assemblies, and "school-sanctioned community events" without demonstrating that those events have comparable origins, mode shares, vehicle occupancy, attendance patterns, or existing off-site destinations.[225] O4-126

That extrapolation is particularly problematic because Table 3-1 permits graduation attendance of approximately 3,500 and community-event attendance of as many as 3,000, while the transportation discussion nevertheless asserts that football games would generate the greatest trip activity and that traffic would increase on only five to eight nights per year.[226]

Even for football, the VMT memorandum analyzes only the record game. It assumes that the 3,301-person game at El Camino would draw 3,400 people at Rio Americano, an increase of 3 percent, and finds a net reduction of 2,098 VMT.[227] The LTA, issued by the same firm on the same date, assumes that a typical game would grow from 1,669 to 2,200 attendees, an increase of about 32 percent.[228] Applying the memorandum's own method to the LTA's typical game, using its vehicle occupancy, non-driving share, visitor count and trip distances, yields a net increase of about 1,440 VMT per game.[229] O4-127

Under the threshold the memorandum adopts, any net increase in regional VMT is a significant impact.[230] The memorandum's premise that the Project "is expected to reduce vehicle trips" also fails for a typical game, in which the number of arriving vehicles would rise O4-128

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[224] Appendix F, Vehicle Miles Travelled Analysis, (Kimley-Horn memorandum dated Sept. 1, 2026), pp. 1-3. The memorandum included as Appendix F does not include page numbers, making referencing specific pages of the analysis more difficult. This omission should be corrected. Appendix F mentions junior varsity games only to support its assumption that 5 percent of attendees will already be on campus: students attending JV games "held immediately prior to varsity games will remain on campus to attend both games." App. F, Methodology and Assumptions. It does not analyze trips generated by the JV games themselves.

[225] DEIR, pp. 4.4-10 – 4.4-11 [graduation, assemblies and "school-sanctioned community events" would shift from other venues; "the conservatively high football-game scenario provides the basis for evaluating the potential VMT effects of other project-related stadium uses"].

[226] *See id.*, pp. 3-7 – 3-9 (Table 3-1), 4.4-9, 4.4-11.

[227] *See id.*, App. F, Tables 1 and 3.

[228] *See id.*, App. E, PDF p. 5; id., Table 3 (PDF p. 6).

[229] *See* Exh. D – Johnson Report, pp. 6–7. Appendix F computes VMT as two one-way trips per vehicle times the average trip distances in its Table 2, which reproduces its Table 3 results within one percent. For the LTA's typical game, home vehicles rise from 495 (1,169 ÷ 2.36) at El Camino to 612 ((1,700 − 255) ÷ 2.36) at Rio Americano, and visitor vehicles stay at 212 (500 ÷ 2.36). Using Appendix F's distances (home 5.8 and 5.0 miles; visitor 12.8 and 15.3 miles), VMT rises from about 11,170 to about 12,610.

[230] DEIR, App. F, PDF p. 3 [significance criterion: "a net increase in regional VMT compared to the existing, no Project, conditions"].

from about 707 to 823.[231] The Final EIR must analyze the VMT of the typical game, which would recur several times each season, and of the full event program. O4-128 (Cont.)

The discussion of aesthetic impacts separately contemplates approximately 40 evening or nighttime events and as many as 88 days of evening practices.[232] Presented here and elsewhere in the DEIR are at least six different event programs: O4-129

- Graduation: about 1,400 attendees, "not … anticipated to increase in attendance" (p. 3-8), versus 3,500 in Table 3-1 (p. 3-9).
- New events: "approximately 13 new" (p. 4.3-18); 40 evening and nighttime events plus up to 88 practice days (p. 4.1-20); traffic increases on "five to eight nights per year" (p. 4.4-9).
- Peak events: nine per year (p. 5.2-6, fn. 2) versus "annual or biennial" (p. 7-13).
- Assemblies and community events: up to four (Table 3-1) versus "up to eight" (pp. 4.2-20, 4.2-21) versus "once monthly on average" (p. 3-7).
- Appendix G: 35 events of 2,500, including five weekend tournaments.
- The LTA: conservative events "fewer than three times a year" (App. E, PDF pp. 8, 19) and "approximately 10 times per year" (PDF p. 14).

The Final EIR must use one complete event schedule and analyze the travel effects of each materially different high-attendance use rather than treating the football analysis as a proxy for the entire operating program.

The mitigation discussion also states that the District would reduce parking demand or limit attendance if the managed parking supply proved inadequate, but that requirement does not appear in the operative language of Mitigation Measures 4.4-3a through 4.4-3c. It must be incorporated as a mandatory, enforceable condition, together with objective triggers specifying when attendance must be capped, reduced, or the event relocated or cancelled. O4-130

Emergency access. The DEIR acknowledges that during nighttime events the paved fire lane between the main parking area and Raider Stadium "would also be used by pedestrians," and that event queues "could interfere with emergency vehicle travel if they obstructed a public travel lane, campus driveway, or designated fire lane."[233] It treats the problem as solved by an Event Transportation Management Plan the District will prepare later and review only after the first highly attended nighttime event.[234] Emergency response to the campus is O4-131

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[231] Id. at pp. 5-6 [screening discussion following Table 3]; 1,669 ÷ 2.36 = 707; DEIR App. E, PDF p. 6 [Table 3].

[232] *See* DEIR, p. 4.1-20.

[233] *Id.* at p. 4.4-18; *see also id* at pp. 4.4-15 – 4.4-16 (Mitigation Measure 4.4-3b); *see also* Exh. E—Item 30 [summary table of the 50 incidents].

[234] *Id*. at pp. 4.4-15 – 4.4-16 (Mitigation Measure 4.4-3b), 4.4-18.

already routine. Fire and medical response records obtained by RACA show 50 incidents at Rio Americano High School between February 7, 2024 and September 16, 2026, about one every 19 days. Apart from 17 fire-alarm activations, they include seven athletic injuries, two of them head injuries; fainting, seizure and allergic-reaction calls; vehicle collisions; a bicyclist struck by an opening car door; and two nighttime fires, one of them reported "near levee." Twelve were reported at or after 5:00 p.m.: ten between 5:06 and 9:21 p.m., four of them at the football field, stadium or soccer fields, and the two fires, at 11:23 p.m. and 12:33 a.m.[235] How an ambulance would reach the field during a 2,200-person game is therefore a practical question. The Final EIR should identify the response route from Sacramento Metropolitan Fire District Station 110 and the route an ambulance would take to the field during an event; provide a pedestrian route separate from the fire lane, or require staff to keep the fire lane clear throughout each event; and require the fire district and the Sheriff's Office to review the Event Transportation Management Plan before the first event, with their requirements made part of Mitigation Measure 4.4-3b.[236]

O4-131 (Cont.)

Mr. Johnson finds that the LTA routes more arriving vehicles into the campus lots than they can hold. He also finds that the 327-space on-street supply includes spaces that are unusable without blocking bicycle lanes, and that the attendance figures behind the trip estimates are unexplained or understated. The LTA's Exhibit 2, he notes, displays school-peak traffic under an evening label while the analysis uses lower evening volumes. And using the VMT memorandum's own method, a typical home game would increase regional VMT. He further concludes that the DEIR understates the traffic that would circulate on American River Drive and Saverien Drive in search of parking at every home game. In his view, a typical home game would have a significant VMT impact, and the bicycle-lane conflict on Saverien Drive is unacceptable.[237]

O4-132

The Final EIR must address these site-specific findings and revise its analysis where Mr. Johnson's evidence conflicts with the DEIR's assumptions. It must also evaluate his recommendations that the trip-generation, intersection and VMT analyses be redone with a design event that reflects on-campus attendance, that the parking supply exclude spaces that would block bicycle lanes, and that nighttime pedestrian safety be addressed with more than crosswalk markings. The District cannot support a less-than-significant conclusion merely by promising future coordination where the record identifies present physical constraints and the mitigation lacks objective standards or an enforceable fallback.

O4-133

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[235] *See* Exh. E, items 28-30 [incident reports, PRA, and summary of the 50 incidents].

[236] The DEIR also asserts, without factual support, that the Project "would not increase … the demand for emergency services" and that "[e]mergency access to the campus would remain unchanged." DEIR, p. 5.12-32. Because the campus already generates regular emergency calls, and the Project adds evening practices and events, the District should consult the fire district and the Sheriff's Office and reconcile that finding with its conclusion under Impact 4.4-4 that event crowds could interfere with emergency access.

[237] *See* Exh. D – Johnson Report, pp. 2–5, 7–9, 13–17.

The Jesuit parking measure commits to nothing, and it is needed at every general game. O4-134

- MM 4.4-3a is titled "Update the Memorandum of Understanding with Jesuit High School," but it requires only that the District "coordinate with Jesuit High School for a Shared Parking Use Agreement" (p. 4.4-15). It does not require an executed agreement before approval, a number of spaces, a term, or termination limits.

- Its own trigger is an attendance of about 1,585 (p. 4.4-15). The DEIR's "general" game is 2,200 attendees with demand for 823 spaces against 672 on campus (p. 4.4-12). Off-site parking would therefore be needed at a typical home game, not only at the rivalry game.

- The measure's protocol expressly contemplates that a Jesuit event may "preclude the availability of excess parking" (p. 4.4-15), and it provides no fallback. The DEIR's significance discussion says the District "would be required to reduce vehicle parking demand, or limit attendance" (p. 4.4-17), but that requirement appears in no measure.

- The LTA says an MOU "is in place" (App. E, PDF p. 14). The cumulative chapter describes it as a "memorandum of understanding for the reciprocal use" of parking (p. 7-8). The District should produce that memorandum, and the Final EIR should explain how it relates to Mitigation Measure 4.4-3a.

RACA does not contend that a shortage of parking is itself an environmental impact. The impacts are its physical consequences. Vehicles would circulate through the neighborhood in search of parking. Parked cars would sit in bicycle lanes. Attendees would cross American River Drive in the dark. Parked cars would block driveways and emergency routes. CEQA requires the District to analyze those secondary effects.[238] O4-135

E. Air Quality, Hazardous Materials, and Water Quality O4-136

The operational air-quality analysis contains a facially irreconcilable trip-generation calculation. The DEIR states that nine peak-attendance events—four football games, four assemblies or community events, and graduation—would <u>each</u> generate 1,295 vehicles, or 2,590 one-way trips.[239] Those nine events alone would therefore generate 23,310 one-way

[238] *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656, 697 ["The social inconvenience of having to hunt for scarce parking spaces is not an environmental impact; the secondary effect of scarce parking on traffic and air quality *is*."], emphasis in original; *see also Covina Residents for Responsible Development v. City of Covina* (2018) 21 Cal.App.5th 712, 728 ["Through its 2013 enactment of section 21099 the Legislature endorsed the approach of the First District in San Franciscans for urban infill projects near transit hubs like the City Ventures project. While secondary parking impacts caused by ensuing traffic congestion ('air quality, noise, safety, or any other impact associated with transportation') must be addressed, parking impacts, in and of themselves, are exempted from CEQA review for these projects."], quoting Pub. Resources Code § 21099, subd. (b)(3).

[239] DEIR, pp. 4.4-12; 5.2-5 – 5.2-6; Appendix E, Local Transportation Analysis, p. 8.

trips. The DEIR also assumes four additional football games generating 823 vehicles each, which would add another 6,584 one-way trips under the DEIR's stated assumption of two trips per vehicle. The resulting total is 29,894 one-way trips, not the 6,826 trips reported on page 5.2-6 (utilized for the air quality impact analysis). Even if the 823 figure were treated as one-way trips rather than vehicles, the total would be 26,602. O4-136 (Cont.)

This is not an immaterial typographical error. The annual trip estimate supplies the mobile-source inputs for the operational air-quality inventory and the greenhouse-gas analysis. The Final EIR must disclose the underlying event-by-event calculation, correct the inconsistent terminology and arithmetic, rerun the applicable emissions models, provide the revised model outputs, and reconsider the resulting significance conclusions.[240]

The air-quality analysis also overlooks construction dust at the nearest homes. The DEIR recognizes "the chronically or acutely ill" as among the groups most sensitive to air pollution, and it places the closest residence about 50 feet from the sports field and 150 feet from the nearest construction improvement.[241] Its exposure analysis, however, addresses only diesel exhaust. It treats fugitive dust as part of a regional mass-emission total controlled by the Air District's basic construction practices, and it relies on distance, dispersion, and "vegetation within their properties" to protect neighbors.[242] The record suggests that construction dust has reached the nearest homes before.[243] The Final EIR should evaluate localized dust exposure at the homes nearest the work areas. It should also strengthen Mitigation Measure 5.2-1 with enforceable controls, such as a wind-speed threshold for suspending earthwork, dust monitoring at the eastern property line, and advance notice to adjacent residents of demolition, grading, and augering days. O4-137

Despite DTSC's and the Air District's NOP comments, the DEIR does not disclose whether the structures to be removed contain lead-based paint, asbestos, mercury or PCB caulk. It does not require surveys, abatement or Rule 902 notification, and it does not address disposal of the treated-wood utility poles. O4-138

The DEIR also concludes that the Project "would not result in operational water quality impacts" because the campus drainage system would not change.[244] That reasoning leaves out event litter. The campus drains to a County main in American River Drive that discharges into the lower American River, which is listed as impaired, and the Project would bring events of up to 3,500 people to the edge of the Parkway.[245] Residents who clean up the Parkway raised the O4-139

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[240] The Final EIR should also correct the greenhouse-gas discussion's apparent references to Table 5.2-1 where the intended reference is Table 5.6-1. *See id.* at p. 5.6-21.

[241] *Id.* at p. 5.2-7.

[242] *Id.* at pp. 5.2-5 (Table 5.2-1, note 1), 5.2-9 – 5.2-10; Mitigation Measure 5.2-1.

[243] *See*, *e.g.*, *id.* at App. A, email from Lou Ambrose (Feb. 5, 2026), PDF p. 107.

[244] *Id.* at p. 5.8-27.

[245] *Id.* at pp. 5.8-26, 3-9.

problem during scoping.[246] The Parkway Plan Policy 5.27.1(w) prohibits discarding refuse in the Parkway. The DEIR already treats food trash as a biological-resources concern, but the included mitigation measure only applies to construction crews.[247] The DEIR requires nothing comparable for events attended by thousands. The Final EIR should estimate event litter and evaluate its movement into the Parkway, onto the levee, and into the storm drains. It should also adopt enforceable measures, such as covered, wildlife-resistant receptacles; cleanup of the campus, the levee, and nearby streets after each large event; and storm-drain inlet protection. O4-139 (Cont.)

Appendix G adds a third, irreconcilable figure, and shows that the published results rest on modeling the public cannot review. The only CalEEMod run in Appendix G, dated December 18, 2025, models 87,500 annual one-way trips: 2,500 trips for each of 35 events, at 5.69 miles per trip.[248] Its notes derive the events from five home football games, graduation, two community events, and "5 tournaments over Fri-Sun weekends per year" (a use that appears nowhere in the Project Description); the resulting 23 event days is then rounded up to 35.[249] The DEIR does not report that run's results. Its operational table reports daily particulate emissions about one-third higher than Appendix G's and annual emissions about one-tenth as large. Its greenhouse-gas table reports 18 metric tons of mobile-source carbon dioxide equivalent a year, where Appendix G reports 180.[250] Those differences are what a run using 2,590 trips per event, 6,826 trips a year, and the 7.34-mile trip length described in the text would produce, but no such run appears in the DEIR or its appendices.[251] The DEIR's air-quality and greenhouse-gas conclusions therefore rest on the lowest of its three trip figures. The DEIR nonetheless calls that figure a "conservative" assumption of "maximum events with peak attendance throughout the year."[252] The Final EIR should publish the model run that supports Tables 5.2-2 and 5.6-1 and reconcile it with Appendix G and with the operating program in Table 3-1. It should also explain why weekend tournaments were modeled but never described. O4-140

Construction fuel handling also needs enforceable controls. The campus drains north to a County storm-drain main in American River Drive that discharges to the lower American River. The river is listed as impaired for, among other pollutants, toxicity and two polycyclic aromatic O4-141

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[246] *See*, *e.g.*, *id.* at App. A, emails from Peter Spaulding (Feb. 2, 2026), PDF p. 126; msr92926@gmail.com (Feb. 4, 2026), PDF p. 120; and Katherine Coulter (Feb. 5, 2026), PDF pp. 92-93.

[247] *Id.* at p. 4.2-22 [Mitigation Measure 4.2-1b].

[248] DEIR, App. G, PDF pp. 4 [Operational Trips table], 37 [CalEEMod detailed report dated December 18, 2025].

[249] *Id.*, PDF p. 4, notes 1, 3; *compare* DEIR, p. 3-9 [Table 3-1].

[250] *Compare* DEIR, p. 5.2-6 (Table 5.2-2: 9.8, 8.2, 13.6, and 3.5 lb/day of ROG, NOx, PM10, and PM2.5; 0.02 and 0.005 tons/year of PM10 and PM2.5) and p. 5.6-21 (Table 5.6-1: operational mobile, 18 MT CO2e/year) *with* App. G, PDF p. 2 [9.1, 6.6, 10.2, and 2.6 lb/day; 0.17 and 0.05 tons/year; mobile, 180 MT CO2e/year].

[251] DEIR, pp. 5.2-5 – 5.2-6. Daily vehicle miles at 2,590 trips and 7.34 miles (19,011) are 1.34 times Appendix G's 14,225, matching the ratio of the particulate values (13.6/10.2 and 3.5/2.6). Annual vehicle miles at 6,826 trips and 7.34 miles (50,103) are about one-tenth of Appendix G's 497,875, matching the annual particulate and greenhouse-gas ratios (0.02/0.17, 0.005/0.05, and 18/180).

[252] *Id.* at p. 5.6-21; see id. at p. 5.2-5 ["conservative estimates"].

hydrocarbons, benzo[b]fluoranthene and chrysene.[253] Because the disturbed area is too small to require a construction stormwater pollution prevention plan, the DEIR relies on general statements instead: O4-141 (Cont.)

- fuel would be delivered by service trucks rather than stored on site;
- equipment would be staged "in paved areas to protect water quality in the unlikely event of an accidental spill"; and
- the contractor would follow the County's general requirement to use best management practices.[254]

None of these statements is a mitigation measure, and the DEIR's water-quality and biological conclusions depend on them.[255] Paved staging areas also carry a spill to storm-drain inlets, yet the DEIR does not identify where the inlets are in relation to the staging area, the fire-lane trenching, or the light-pole foundations. The Final EIR should map the storm-drain inlets relative to all work and staging areas and adopt the following as enforceable mitigation:

1. no fueling or equipment maintenance within 50 feet of a storm-drain inlet, with inlet protection throughout construction;
2. drip pans and secondary containment for stationary equipment, including the diesel generator the emissions model assumes;
3. spill kits at each work area and wherever fueling occurs;
4. daily inspections, and prompt reporting of any release to the District and the County;
5. Tier 4 Final engines for off-road diesel equipment; and O4-142
6. a two-minute idling limit within 300 feet of homes.

The last two measures are warranted because the nearest residence is about 150 feet from construction, the modeled equipment uses fleet-average engines, and the DEIR prepared no construction health risk assessment.[256] The cumulative analysis should also disclose the fuel type, fuel storage, and testing schedule of the cell tower's backup generator. The District's O4-143

[253] DEIR, p. 5.8-26.

[254] *Id.* at pp. 5.7-22 [Impacts 5.7-1, 5.7-2], 5.8-27 [no SWPPP required; Sacramento County Code, § 15.12.322].

[255] *Id.* at pp. 4.2-15, 4.2-24, 5.8-27, 5.9-29 [printed page following p. 5.8-28]; CEQA Guidelines, § 15126.4, subd. (a)(2).

[256] *Id.* at pp. 5.2-4 [Mitigation Measure 5.2-1, five-minute idling limit], 5.2-7 [residence about 150 feet from the nearest construction], 5.2-9 – 5.2-10; App. G, PDF pp. 3 [one diesel generator set, eight hours a day], 33–34 [engine tier "Average"].

lease plans show it as a 30-kilowatt Generac unit on a new concrete pad, while the DEIR describes it only as a "backup generator."[257]

O4-143 (Cont.)

The Final EIR must also address the levee. The Project would auger four holes about three feet in diameter and about 16 feet deep for the 80-foot light standards, plus smaller foundations for the egress lighting.[258] The DEIR describes the levee between the campus and the Parkway as a U.S. Army Corps of Engineers flood-control levee, part of the Sacramento River Flood Control Plan. It acknowledges that the site lies within a 200-year floodplain and owes its reduced-flood-risk designation to that levee.[259] The DEIR places the levee slopes within 100 feet of the project site. It also states that the nearest light standard would be about 175 feet from the Parkway, whose northern edge it equates with the levee toe and the Jedediah Smith Trail on the river side of the levee (but see Section II.B).[260] The landside toe, where underseepage would emerge, is therefore closer to that light standard than 175 feet by the width of the levee.

O4-144

The DEIR never states that distance, here or in its zoning analysis (see Section III.F). Nor does it evaluate the risk. Its geology discussion finds "no impact" from unstable soils without mentioning the levee, and the DEIR contains no geotechnical or seepage analysis.[261] During scoping, SARA asked that, "[i]f applicable, a geotechnical study … be included to evaluate any potential effects on the stability of the levee, levee prism, and land adjacent to the construction area."[262] A neighbor warned that holes "three feet in diameter and sixteen feet deep close to the toe of the levee … could result in boils during times of very high river levels."[263] Whether the foundations could open a path for underseepage at high water is an engineering question the DEIR never asks.

The DEIR's list of required approvals names only Division of the State Architect review.[264] Yet the Central Valley Flood Protection Board must approve in advance any excavation or structure within an adopted plan of flood control, which extends at least ten feet landward of the levee toe. It must also approve work outside that area when it is foreseeable that the work could be injurious to or interfere with the flood-control works. And any

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[257] Ground Lease Agreement, Site SACR02 (District–Public Safety Towers, LLC), Exh. B, sheet A-4 ("(N) FirstNet by AT&T 30KW Generac generator on (N) concrete pad"); DEIR, p. 7-2 (Table 7-1).

[258] DEIR, pp. 3-8, 5.8-28.

[259] *Id.* at pp. 3-4, 4.5-6 (Levee Unit 118, Part 2), 5.8-26.

[260] *Id.* at pp. 4.1-14, 4.1-19, 4.2-9, 4.2-18.

[261] *Id.* at, p. 5.5-17 (Impact 5.5-3).

[262] *Id.* at App. A, SARA letter (Feb. 4, 2026), p. 4 [PDF p. 152]; letter from Severiano and Connie Del Real (Feb. 3, 2026) [PDF p. 164].

[263] *Id.*, PDF p. 164.

[264] *Id.* at pp. 2-3 – 2-4, 3-11 – 3-12.

alteration that could impair the usefulness of a levee built by the United States requires the Corps' permission.[265] The Final EIR should take four steps:

1. disclose the distance from each foundation to the landside levee toe;

2. evaluate underseepage and levee stability in a geotechnical analysis prepared by a licensed engineer;

3. consult the Flood Protection Board and the levee's maintaining agency; and

4. identify any encroachment permit or Corps permission the Project requires (see Section III.H, item 6).[266]

O4-144 (Cont.)

F. Land Use, Parkway Plan Consistency, and Recreation

1. The DEIR Incorrectly Assumes That County Zoning and Parkway Corridor Requirements Do Not Apply

The DEIR repeatedly asserts that County land-use regulations do not apply to the Project. For example, the biological-resources section states that, because public school districts are political subdivisions of the State, "they are not subject to local municipal regulations and ordinances."[267] The land-use section similarly describes the Parkway Corridor Combining Zone ("PCZ") as "not directly applicable to the District" and declares the PCZ's procedures inapplicable.[268] Those assertions misstate California law and cannot support the DEIR's less-than-significant land-use conclusion.

Government Code section 53091 establishes the opposite starting rule: "[e]ach local agency shall comply with all applicable building ordinances and zoning ordinances of the county or city in which the territory of the local agency is situated." Although the statute separately provides that school districts are not required to comply with local building ordinances, it does not grant school districts a corresponding automatic exemption from zoning ordinances.[269] The DEIR improperly conflates these distinct subjects.

O4-145

Government Code section 53094 provides a limited exception to the zoning-compliance requirement. Subdivision (a) excuses a school district from local zoning only where the local zoning ordinance does not provide for the location of public schools or the city or county has not adopted a general plan. Neither condition appears to exist here. The DEIR acknowledges that Sacramento County has adopted a general plan and affirmatively states that public schools

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265 Cal. Code Regs., tit. 23, §§ 4, subd. (a)(2)(A), (a)(4), 6, subds. (a), (c); 33 U.S.C. § 408.

266 CEQA Guidelines, §§ 15086, subd. (a), 15124, subd. (d)(1).

267 DEIR, p. 4.2-12.

268 *Id.* at pp. 5.9-29–5.9-30.

269 Gov. Code, § 53091, subds. (a), (b).

are a permitted use in the property's underlying RD-4 zoning district.[270] The exception in section 53094(a) therefore does not support the District's claimed exemption. O4-145 (Cont.)

A school district may instead invoke the project-specific override authorized by section 53094(b), but that authority is neither automatic nor self-executing. The governing board must comply with the applicable requirements of Government Code section 65352.2 and Public Resources Code section 21151.2 and, by a vote of two-thirds of its members, render the particular city or county zoning ordinance inapplicable to the proposed use. The District must then notify the affected city or county within 10 days, thereby allowing the local government to seek judicial review of the override as arbitrary and capricious.[271] O4-146

The governing authority confirms that school districts do not possess categorical immunity from local zoning. In *City of Santa Cruz v. Santa Cruz City Schools Board of Education* (1989) 210 Cal.App.3d 1, the court upheld an override for replacement lighting at a high-school athletic field because substantial evidence showed that the field and lighting were directly used for student physical education, athletics, band, and other instructional purposes.[272] But the court emphasized that section 53094 strikes a balance between state educational interests and local land-use control: the school board must take affirmative action, its decision is subject to public and judicial scrutiny, and an override may be invalidated if arbitrary and capricious.[273] Thus, even if the District could establish that all components and uses of the proposed stadium are sufficiently related to student instruction to qualify for an override, that potential authority does not itself make County zoning inapplicable. O4-147

Section 53094(b) also expressly prohibits a school district from exercising the zoning-override authority when the proposed use is for "nonclassroom facilities." The DEIR does not acknowledge that limitation or analyze whether each component and authorized use of the proposed stadium falls within the permissible scope of an override. Although facilities used directly for physical education and student athletics may serve an instructional function, the Project also contemplates graduation, school-sanctioned community events, large public gatherings, ticketed events, and other nonclassroom uses. O4-148

The District therefore cannot resolve the zoning issue through a generalized assertion that the stadium is located on a school campus. Before relying on section 53094, it must identify the particular facilities and uses covered by the proposed resolution, determine whether the statutory nonclassroom limitation applies to any of them, and support that determination with findings and evidence. At minimum, an override justified by student instruction should not be assumed to exempt materially different community or O4-149

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[270] DEIR, pp. 3-4, 5.9-29.

[271] Gov. Code, § 53094, subds. (b), (c).

[272] *See City of Santa Cruz*, *supra*, 210 Cal.App.3d at pp. 6–9.

[273] *Id.* at pp. 5–6.

noninstructional uses from otherwise applicable County zoning and Parkway Corridor requirements. O4-149 (Cont.)

The DEIR identifies no section 53094 resolution for the Project, no two-thirds Board vote, no notice to Sacramento County, and no supporting findings or evidence defining the zoning provisions or proposed uses purportedly covered by an override. The DEIR also omits the District's one known zoning override for the stadium site. On April 27, 2010, while the 2010 Draft EIR was still in public review and seven weeks before it certified the 2010 EIR, the Board adopted Resolution No. 2521 by a 5–0 vote under section 53094(b).[274] The resolution exempted "the Rio Americano High School Sports Facility Project" from the County zoning code, "which includes all permitting conditions and prohibitions that may otherwise apply to the Project," after finding that the County code "unduly hampers, interferes with, and may delay or limit the Project." It defined that project as upgrades to the existing fields, a permanent snack bar and restroom, a field house, and permanent and additional portable bleachers. It did not mention lighting, and the EIR the Board certified that June stated that "[n]o nighttime lighting of sports fields is proposed as part of the Project."[275] Section 53094(b) applies to "a proposed use of property," and the 2010 Board's classroom-facility finding addressed the daytime athletic facility then before it. Resolution No. 2521 therefore cannot render County zoning inapplicable to the four 80-foot light standards, the evening operations they would enable, or the non-athletic and community uses the current Project proposes. O4-150

Resolution No. 2521 also shows that the District itself understood that County zoning governs its athletic facilities unless the Board acts under section 53094. That understanding cannot be reconciled with the DEIR's statements that school districts "are not subject to local municipal regulations and ordinances" (p. 4.2-12) and that the Project "does not require any zoning-related approvals from Sacramento County" (p. 4.1-13). Even with Resolution No. 2521 in place, the District's 2010 findings determined that the project was "consistent with the development and design standards outlined in the Parkway Corridor Combining Zone."[276] The current DEIR, with no override for the new structures and uses, performs no comparable analysis. The DEIR does not explain why the District evaluated the 2010 project against the PCZ standards but now treats them as inapplicable to a larger project on the same field. O4-151

In the absence of a valid, applicable section 53094 override, the Project remains subject to Sacramento County's zoning regulations. The campus is zoned RD-4/PC, meaning the PC designation applies in addition to the underlying zoning district.[277] The PCZ is intended to ensure compatibility between development and the American River Parkway, reduce visible O4-152

[274] *See* Exhibit J – San Juan Unified School Dist. Res. No. 2521, adopted Apr. 27, 2010.

[275] 2010 Findings, pp. 1–2, 15; 2010 FEIR, pp. 2-18 – 2-19 (response 7-3).

[276] *Id.* at p. 35.

[277] Sacramento County Zoning Code, § 4.7.1.A, subd. (1), available at: https://landuse.saccounty.gov/szc/ch4/.

intrusion into the Parkway, regulate height, bulk, setbacks, and landscaping, and protect the Parkway's aesthetic and environmental quality.[278]

O4-152 (Cont.)

The DEIR's treatment of the substantive PCZ requirements is also inadequate. Section 4.7.3.A establishes height and setback requirements for "uses, buildings, or structures" on lots protected by publicly maintained levees. Section 4.7.4.A generally requires a conditional use permit ("CUP") for uses otherwise permitted or conditionally permitted in the underlying zoning district. The DEIR dismisses the height and setback standards because the Project purportedly would improve an existing stadium without constructing "new buildings."[279] But the Code applies to both buildings and structures, and the Project would construct numerous new structures, including four 80-foot permanent light standards, expanded bleachers, an elevated press box, and pedestrian-lighting poles. The continued existence of the school use and campus boundary does not exempt those structures or the associated intensified use from PCZ review.

O4-153

The DEIR does not apply the PCZ height formula to any proposed structure, disclose the distance of each structure from the landward toe of the levee, determine whether the existing school conditional use permit authorizes the proposed expansion, or identify whether a conditional use permit amendment, design review, or other County entitlement is required. These are matters for formal consideration by the County under its Code, not assumptions the District may resolve merely by labeling the improvements part of an existing school campus.

O4-154

Moreover, Government Code section 53097 independently requires school districts to comply with County ordinances regulating on-site drainage improvements and conditions, road improvements and conditions, and review and approval of grading plans. Those requirements apply "[n]otwithstanding any other provisions" of the statutory article and are not displaced by a section 53094 zoning override. The DEIR therefore must identify any County grading, drainage, road, stormwater, access, or related approvals required for the Project even if the District ultimately adopts a valid zoning override.

O4-155

The DEIR itself states that the school operates under a County conditional use permit.

- The aesthetics section states: "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." It adds that the County Zoning Code "allows outdoor nighttime lighting at schools with a conditional use permit" (p. 4.1-18).

O4-156

[278] *Id.*, § 4.7.1. The goals promoted by the PCZ include: "Ensure that development with access within and adjacent to the American River Parkway is designed to reduce as much as possible visible intrusion into the Parkway and to complement the naturalistic amenities of the Parkway" and "Ensure that development within the American River Parkway Corridor zoning district occurs in a manner that maintains a safe environment for homes and other improvements, and protects the aesthetic and environmental quality of the Parkway." *Ibid.*

[279] DEIR, pp. 5.9-30; *see also id.* at p. 7-11.

- The alternatives chapter says nighttime lighting "would be allowed with a conditional use permit if the County had jurisdiction" (p. 6-6).

- Elsewhere the DEIR says public schools are a "primary, permitted use" in RD-4 (pp. 3-4, 5.9-29, 6-12), and that the project "does not require any zoning-related approvals from Sacramento County" (p. 4.1-13).

O4-157

The Final EIR should produce that permit and its conditions, explain which conditions, if any, Resolution No. 2521 displaced for the 2010 facilities, and explain whether the permit authorizes the new lighting and evening and community uses, which that resolution does not cover.

O4-158

The analysis of land use impacts includes other inconsistencies that must be resolved:

- Impact 5.9-2 is headed "No Impact" but concludes "less than significant."[280]

- It refers readers to visual simulations in "section 4.2, 'Aesthetics'" (p. 5.9-30); aesthetics is Section 4.1. The recreation cumulative discussion refers to "Section 3.1, 'Aesthetics'" (p. 7-11).

O4-159

- The biology section applies Parkway Plan Policy 7.5, which provides that privately owned parcels may be developed "consistent with local zoning" (pp. 4.2-26 – 4.2-27), while the land-use section treats local zoning as inapplicable.

O4-160

The DEIR's objectives match the NOP's (pp. 3-10, 6-3). The first two are to "Enhance the Rio Americano High School campus as a Center of Community" and to provide capacity for "non-athletic events, including all-school assemblies, graduation, and other special and regular events." These objectives confirm that significant authorized uses are not classroom-related and thus are not eligible for an exemption from County standards under Section 53094.

O4-161

The Final EIR should correct the discussion concerning required approvals and ordinarily applicable County permitting requirements and disclose the actual regulatory path. If the District contends that County zoning is already inapplicable, including on the basis of Resolution No. 2521, it should identify and reproduce the applicable section 53094 resolution, Board agenda and staff report, recorded vote, supporting evidence and findings, proof of compliance with the statutory prerequisites, and timely notice to Sacramento County. It should also explain why that action encompasses every component and operational use of the current Project, including the permanent lighting that the 2010 project expressly excluded. If no valid project-specific override exists, the Final EIR must acknowledge that the Project is subject to County zoning; identify Sacramento County as an agency with approval authority; list the required conditional use permit, permit amendment, design review, or other land-use entitlements; and demonstrate compliance with all applicable PCZ standards.

O4-162

[280] DEIR, pp. 4.1-13, 5.9-29 – 5.9-30.

In either circumstance, the District remains independently obligated to determine and demonstrate consistency with the American River Parkway Plan under Public Resources Code section 5842(b). A section 53094 resolution could render specified County zoning provisions inapplicable; it could not repeal the Urban American River Parkway Preservation Act, excuse compliance with Government Code section 53097, or eliminate CEQA's requirement to analyze the physical environmental consequences of conflicts with plans and regulations adopted to protect the Parkway. O4-163

The recreation discussion likewise equates the absence of increased demand for off-site parks with the absence of effects on Parkway recreationists.[281] That approach is inadequate. The EIR must address potential degradation of the Parkway experience from visible structures; lighting, glare, and skyglow at dusk and after closing; event noise before the Parkway closes; and event-related pedestrian activity and congestion. The Parkway's Limited Recreation designation and after-dark closure are protective management features. If the District relies on lighting design, shielding, operating hours, screening, or similar protections to support a less-than-significant conclusion, those protections must be described with sufficient specificity and incorporated as enforceable mitigation measures or conditions of approval. O4-164

2. Independent statutory duty to analyze inconsistencies with Parkway Plan policies O4-165

The DEIR's land-use conclusion rests principally on the unchanged school designation, campus boundary, and the District's position that County zoning approvals are unnecessary.[282] That does not resolve the relevant inquiry. The proposed Project would introduce and intensify physical and operational conditions adjacent to the Parkway, including four approximately 80-foot permanent light poles, expanded bleachers, permanent PA-system, elevated press box and recurring evening practices, games, and events. The EIR must evaluate those changed conditions against policies adopted to avoid or mitigate environmental effects on the Parkway.

The DEIR itself recognizes that development adjacent to the Parkway must remain consistent with the American River Parkway Plan (Parkway Plan).[283] The operative statutory provision is Public Resources Code section 5842(b), which provides that state and local agency actions concerning land-use decisions shall be consistent with the Parkway Plan.[284] That independent consistency duty is not eliminated by the District's asserted (but unverified) exemption from County zoning or by the fact that the stadium improvements would occur outside the mapped Parkway boundary. O4-166

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[281] *See* DEIR, pp. 5.13-33 – 5.14-34 (page numbers as printed) (Impacts 5.13-1, 5.13-2).

[282] See *id.* at pp. 4.1-13, 5.9-29 – 5.9-30 (Impact 5.9-2).

[283] See *id.* at pp. 5.9-29 to 5.9-30.

[284] SARA made the same point during scoping, noting that the Plan "is not just advisory" because the Legislature adopted it in the Urban American River Parkway Preservation Act. DEIR App. A, SARA letter (Feb. 4, 2026), p. 3 [PDF p. 157]

The Final EIR should therefore provide a policy-specific consistency analysis addressing, at a minimum, Parkway Plan Policies 7.19, 7.19.1, 7.19.2, 7.23, 7.24, and 9.24.1. Those policies direct jurisdictions to reduce, eliminate, or mitigate adverse Parkway effects from adjacent land uses and activities; protect Parkway plants and wildlife; avoid interference with recreational use; provide visual buffering; and discourage intrusive lighting. O4-167

Policy 9.24.1 provides that "[n]ighttime lighting within the parkway shall be minimized without compromising public safety." The DEIR quotes the Plan's related direction that necessary lighting in the Parkway minimize "impacts to wildlife and night sky aesthetics" through techniques such as "full cut off optics, short heights, timers, motion sensors." It states that, although this language applies within the Parkway, "a similar approach can be considered for adjacent lighting."[285] The DEIR never takes that approach. It does not mention Policy 9.24.1, and it does not evaluate the Project's four 80-foot light standards against it. The Plan also lists permanent bleachers, permanent lighting other than security lights, and permanent sound amplification among the facilities it deems "incompatible with the parkway."[286] The analysis should also address the Plan's discussion of artificial lighting, night-sky aesthetics, and wildlife habitat function. It is not sufficient to state that the Parkway Corridor regulations and Parkway Plan policies do not directly apply and then invoke selected provisions only as background context. O4-168

G. Cultural Resources

RACA does not seek to disturb confidential tribal information or to second-guess the mitigation developed through consultation with the United Auburn Indian Community and Wilton Rancheria. The Final EIR should nevertheless clarify and reconcile the separate procedures stated in Mitigation Measures 4.5-1a through 4.5-1c and 5.3-2 and 5.3-3.[287] Those measures appear to establish overlapping procedures for discoveries of archaeological material, Native American cultural material, and human remains, without clearly stating which procedure controls when a discovery falls within more than one category. O4-169

The FIER should also resolve internal inconsistencies within the DEIR's analysis of potentially significant cultural resources impacts. Impact 5.3-3 states: "There has been no indication or evidence that the area has been used for human burials."[288] But United Auburn Indian Community of the Auburn Rancheria ("UAIC") reported that its registry shows four tribal cultural resources ("TCRs") within a quarter mile, "including an oral history described as a burial area."[289] Wilton Rancheria reported a village site within 0.25 mile.[290] UAIC assessed a O4-170

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285 DEIR p. 4.2-14.

286 American River Parkway Plan, Policy 5.27.2(d), (o), (p).

287 *See* DEIR, pp. 5.3-12 – 5.4-15.

288 *Id.* at p. 5.3-14.

289 *Id.* at p. 4.5-7.

290 *Id.* at p. 4.5-9.

"moderate to high potential for buried TCRs."[291] The DEIR nevertheless states that "[n]either tribe identified TCRs in or near the project site."[292]

O4-170 (Cont.)

The analysis also relies on prior disturbance and the supposedly limited extent of excavation, while the Project includes augering four approximately three-foot-diameter light-standard foundations to depths of approximately 16 feet, together with trenching and other ground disturbance. The Final EIR should identify, at a nonconfidential level, the location and depth of documented prior disturbance and explain whether the proposed augering would extend below it. The document should also correct the erroneous mitigation cross-references in the cultural-resources significance discussions,[293] ensure mitigation measures include required performance standards and are enforceable,[294] and incorporate a single, coordinated discovery protocol into the mitigation-monitoring program.

O4-171

H. Cumulative Impacts and other CEQA Considerations

O4-172

The cumulative-impact analysis must be revised to evaluate the stadium project and the separately approved cell-tower project as related development on the Rio Americano High School campus.[295] The controversial tower consists of an approximately 90-foot monopole, equipment compound, equipment shelter, and backup generator. Because it would occupy the same Parkway-adjacent campus, its visual, construction, operational, noise, lighting, biological, and related environmental effects may overlap with or compound those of the stadium project.

The DEIR cannot satisfy CEQA by merely listing the tower as a cumulative project and then relying on generalized conclusions that do not analyze its contribution to the cumulative setting. The analysis must accurately disclose the tower's approval status, physical characteristics, construction schedule, operational characteristics, generator-testing and

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[291] *Id.* at p. 4.5-10.

[292] *Id.* at p. 4.5-11.

[293] *See*, *e.g.*, *id.* at p. 5.3-14 [archaeology significance discussion relies on "Mitigation Measure 5.3-1," which does not exist (the measure is 5.3-2); *see also id.* at 5.4-15 (as printed) [human-remains discussion relies on "Mitigation Measure 5.3-2" for the human-remains protocol, which is MM 5.3-3; *see also id.* at p. 7-6 [cumulative discussion cites "Mitigation Measures 5.3-1 and 5.3-2"].

[294] For example, MM 4.5-1c makes contacting the UAIC Tribal Historic Preservation Officer at least 1 month prior to the initial project ground-disturbing activities "if feasible" an impermissibly permissive measure and allows work proceed irrespective of advanced notice. *See id.* at pp. 1-18 [Table 1-1], 4.5-12 – 4.5-13.

[295] On June 10, 2025, the District's Board adopted Resolution No. 4212 approving a lease with Public Safety Towers, LLC for the tower. The District's CEQA analysis came months later. Its consultant surveyed the site on October 16, 2025, and issued a memorandum dated October 29, 2025, concluding that the tower was categorically exempt under CEQA Guidelines sections 15303 and 15314. *See* Exh. I, Terracon Consultants, Inc., *CEQA Notice of Exemption and Categorical Exemption Memorandum* (Oct. 29, 2025), pp. 1–2, 5.) The District did not file the notice of exemption enclosed with that memorandum. *See* District email to Lisa Phenix, dated Oct. 6, 2026 (incorporated by reference).

An exemption determination made after the project has been approved is the kind of "post hoc rationalization[] to support action already taken" that CEQA does not allow. *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 394.

emergency-operation assumptions, outstanding permits or reviews, and the evidence supporting the District's conclusions. It should also explain the respective positions of the District and Sacramento County concerning County zoning, Parkway Corridor review, and consistency with the American River Parkway Plan to the extent those matters affect the cumulative setting, the cell tower's reasonably foreseeable operation, or the scope of its potential environmental effects. O4-172 (Cont.)

The DEIR's own discussion shows the gap. Table 7-1 lists the tower as an approved 90-foot monopole with an equipment shelter and backup generator, and the DEIR acknowledges that the tower and the stadium light standards would be of "similar heights."[296] Yet the cumulative aesthetics discussion, which concedes that the light standards would be visible from the Parkway, never mentions the tower, and neither does the cumulative biological resources discussion.[297] The cumulative noise discussion omits the generator, describing the tower as having no substantial operational noise source "other than occasional maintenance activity," and the recreation discussion asserts, without analysis, that the tower "would have no effect on recreation … at the American River Parkway."[298] O4-173

No other District document fills that gap. The District's only environmental review of the tower is a consultant memorandum supporting a categorical exemption. That memorandum places the tower on the campus boundary beside the levee, yet it never mentions the American River Parkway, the levee, or the river. It evaluates visual effects only against a state scenic highway 22 miles away, and it describes no backup generator.[299] The tower's effects on the Parkway setting have therefore never been evaluated, alone or together with the Project. O4-174

Chapter 7 contains several additional errors that must be corrected. The discussion of growth-inducing impacts erroneously cites CEQA Guidelines section 15126.2, subdivision (d). The discussion of significant and unavoidable effects cites an apparent nonexistent section (15216.2, subdivision (b)).[300] Section 7.5 also contains a substantive internal contradiction: it states that the Project would not produce cumulatively considerable impacts, while also concluding that the Project's construction- and operational-noise contributions would be cumulatively considerable.[301] O4-175

The Final EIR must identify which conclusion controls, explain the factual and analytical basis for that conclusion, and consistently characterize the significance of the Project's cumulative noise contribution throughout the document. Page 7-17 (Section 7.5(d)) apparently O4-176

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296 DEIR pp. 7-2, 7-8.

297 See *id.* at pp. 7-2 – 7-3, 7-5 – 7-6.

298 See *id.* at pp. 7-10, 7-11.

299 Exh. I – Terracon memorandum, pp. 1–3, 7.

300 DEIR, p. 7-14.

301 *See id.* at pp. 7-10, 7-16.

refers to Mitigation Measure 4.3-2 when the intended reference is Mitigation Measure 4.3-1b and should be corrected or explained.[302] Finally, Table 7-1 incorrectly defines "IDA" as the "International Detailing Association."[303] The intended reference appears to be the International Dark-Sky Association (now DarkSky International), the organization associated with the dark-sky standards discussed in the DEIR. These errors, particularly the conflicting significance determinations in section 7.5, prevent reviewers from determining what the DEIR actually concludes and which mitigation measures support those conclusions. O4-176 (Cont.)

RACA's expert evidence further demonstrates the need for a more complete cumulative analysis. The Eagle Sight Report documents a Jesuit evening game drawing heavy parking onto American River Drive and Jacob Lane, the corridor on which the DEIR counts on-street parking for the Project, with the Jesuit stadium as the dominant light source in the neighborhood.[304] Dr. Smallwood's surveys document wildlife use of the shared receiving environment (including use by 26 special-status species). Mr. Watry's analysis addresses the effects of amplified events, crowd and bleacher activity, and post-event parking and departures on nearby homes and the Parkway. Mr. Johnson's report documents parking and circulation constraints on American River Drive and Saverien Drive, the streets that Jesuit event traffic also uses. These materials should be incorporated into a revised analysis that evaluates the projects and activities together where they affect the same views, habitat, residences, streets, intersections, pedestrian routes, and emergency-access facilities. O4-177

At a minimum, the revised cumulative analysis must address: O4-178

1. The combined visual profile of the enlarged and intensified stadium and cell tower from the Parkway, levee, trail, surrounding neighborhoods, and other public viewpoints, including the visibility of the stadium light poles, monopole, equipment compound, equipment shelter, and associated security or operational lighting, as well as their contribution to nighttime glow.

2. Overlapping or sequential construction activities, including construction traffic, equipment noise, air emissions, interference with emergency access, drainage and erosion effects, fuel handling, and spill risk near the Parkway and levee. O4-179

3. Combined operational noise and vibration, including stadium events, public-address-system use, crowd ingress and egress, tower equipment, backup-generator testing and emergency operation, and other recurring daytime or nighttime activities. O4-180

4. Combined lighting, glare, skyglow, and wildlife-disturbance effects, including effects on the Parkway's LZ0/E1 nighttime conditions, habitat function, bats, birds, migratory species, and the experience of Parkway users. O4-181

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302 *See id.* at p. 7-17.

303 *See id.* at p. 7-2.

304 Exh. A – Eagle Sight Report, §§ 3–4, pp. 2–3, and Figs. 1, 3.

5. Cumulative effects on Parkway recreation, scenic resources, and night-sky values, and consistency with American River Parkway Plan Policies 7.19, 7.19.1, 7.19.2, 7.23, 7.24, and 9.24.1. O4-182

6. The relationship between the projects and any required approvals from Sacramento County, the Central Valley Flood Protection Board, the U.S. Army Corps of Engineers, or other agencies with jurisdiction over the levee, Parkway, drainage, access, or related resources. O4-183

7. The relationship of the Project to the 2010 Outdoor Sports Facility Upgrades Project, the athletic-facility improvements undertaken from 2017 through 2021, the open or incomplete DSA sports-field application, and reasonably foreseeable projects identified in the 2024 Facilities Master Plan. O4-184

8. The combined operational effects of simultaneous stadium, pool, Performing Arts Center, school, and other campus events, including parking demand, pedestrian circulation, neighborhood traffic, emergency access, amplified sound, and late-evening activity. O4-185

9. The continuing or residual environmental effects identified in the 2010 EIR, the mitigation measures and operating conditions adopted for that project, and whether the present Project would undermine, supersede, conflict with, or require modification of those protections. O4-186

10. Jesuit High School's lighted stadium and public-address use, and the increased enrollment and stadium use expected when Jesuit becomes co-educational in 2027. Jesuit's evening events already generate traffic, parking demand, noise, and light in the same neighborhoods. The DEIR must evaluate the two schools' combined effects rather than the District's stadium in isolation.[305] The DEIR treats Jesuit as half a mile away and concludes that its events would not combine with the Project's (pp. 7-2, 7-10), yet during a Jesuit game on September 4, 2026, RACA's consultant recorded heavy parking along American River Drive and Jacob Lane, and the cumulative transportation discussion considers a concurrent game only for turn-lane queues (pp. 7-12 to 7-13).[306] O4-187

11. The DEIR should analyze the Rio Americano Stadium Project in combination with the U.S. Army Corps of Engineers' Lower American River Contract 3B, a reasonably foreseeable project involving substantial erosion-control, tree removal and levee-protection work along the American River. Contract 3B is planned along the Lower American River between approximately Howe Avenue and Mayhew Drain and would O4-188

[305] The 2010 Findings acknowledged that varsity games at both schools "on a Saturday afternoon" could cause "potentially significant cumulative noise impacts." 2010 Findings, p. 36. This finding supports RACA's request for a combined Jesuit analysis.

[306] Exh. A – Eagle Sight Report, § 3, p. 2 (8:40 p.m. entry); § 4, p. 3.

affect riverbank vegetation, wildlife habitat, recreation, aesthetics, and the Parkway environment.[307]

O4-188 (Cont.)

The Final EIR must therefore reconcile the contradictory cumulative-noise conclusions, evaluate the stadium and cell tower against an accurate and complete cumulative setting, and identify the substantial evidence supporting each conclusion concerning the individual and combined effects of the cell tower, stadium, prior campus improvements, reasonably foreseeable campus improvements, and activities.

O4-189

I. Mitigation Monitoring and Residual Effects

O4-190

The District should revise the mitigation program so that measures are objective, mandatory, enforceable, and publicly verifiable. At a minimum, the program should identify responsible personnel, timing, measurable standards, monitoring locations and frequency, record-retention and public-reporting duties, corrective actions, and suspension or attendance-reduction procedures when a standard cannot be met. Measures should use 'shall,' not 'should,' and should not allow the District to dispense with protections based on undefined feasibility determinations.

Table 1 summarizes the principal deficiencies in the proposed measures and the changes the Final EIR should make.

O4-191

Table 1: Summary of Mitigation Measure Deficiencies and Remedies.

Measure (DEIR page)	What it requires	Deficiency (letter section)	What the Final EIR should require
4.1-2 DarkSky "pass" (p. 4.1-26)	Obtain a DarkSky "pass" rating before construction.	No numeric limits, operating hours, dimming, field verification or retesting. Relies on a rating issued to Jesuit's lighting (III.A).	Illuminance limits at named receptors, 3,000 K or lower, curfew and automatic shutoff, post-installation verification, periodic retesting, corrective action.
4.2-1b BMPs (pp. 4.2-21 – 4.2-22)	Food-trash controls for construction crews.	Nothing for events of up to 3,500 people beside the Parkway (III.E).	Wildlife-resistant receptacles; post-event cleanup of campus, levee and streets; inlet protection.
4.2-1e Nesting birds (p. 4.2-22)	Survey by "a qualified biologist" within three days of construction; buffers at the biologist's discretion.	No survey-effort standard, objective buffers or reporting. Construction only (III.B.4).	Effort proportionate to nest density, objective buffers, coverage of maintenance and field preparation, public reporting.

O4-192

O4-193

[307] *See* Site 4-2, ARCF Comprehensive SEIS/SEIR Page 3-70, and Figure 3.5.2.5, available at: https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/_ARCF%20Final%20SEIS-SEIR%20Document%2009MAY25.pdf?ver=LG0SUUZjm7tJTWNXyKZiFA%3D%3D.

Measure (DEIR page)	What it requires	Deficiency (letter section)	What the Final EIR should require	
4.3-1a Construction noise (p. 4.3-24)	Notice, work hours, horn limits, 150-ft setback.	Hours exceed the analyzed weekday schedule. Setback equals the assumed distance. Equipment controls and complaint response appear only in the discussion (II.G.3, III.C.5).	Weekday 7 a.m. – 4 p.m. schedule, the 2010 equipment controls, a complaint-response process.	O4-194
4.3-1b Event noise (pp. 4.3-25 – 4.3-26)	PA level and testing, distributed speakers, noisemaker limits, bleacher treatments.	Alternative PA level allowed. Bleacher treatments can be found infeasible. No total-event standard. The complaint and corrective-action process (p. 4.3-27) is not in the measure (II.E, III.C).	Total-event standard (70/65 dBA Lmax), continuous monitoring with public reporting, bleacher damping, absorptive walls, corrective-action thresholds.	O4-195
4.4-3a Jesuit parking (p. 4.4-15)	"Coordinate" with Jesuit on a shared-parking agreement.	No executed agreement, number of spaces, term or fallback. Jesuit's County conditions count Rio's lots as Jesuit overflow (II.E, III.D).	Executed agreement before approval, with spaces and term, and an attendance limit if spaces are unavailable.	O4-196
4.4-3b Event Transportation Management Plan (pp. 4.4-15 – 4.4-16)	A future plan with staff and signs; review after the first large event.	Defers crossings, staffing and triggers. No fire or Sheriff role (II.E, III.D).	Crossing locations and treatments now, staffing triggers, fire and Sheriff review before the first event.	O4-197
4.4-3c High-capacity events (p. 4.4-16)	Listed circulation actions, all phrased as "should."	Advisory. No trigger, standards, monitoring or fallback (II.E).	The seven requirements listed in Section II.E.	O4-198
4.5-1c UAIC notice (p. 4.5-12)	Notify UAIC at least one month before ground disturbance "if feasible."	Optional. Overlaps 5.3-2 and 5.3-3, with cross-reference errors (III.G).	Mandatory notice and one coordinated discovery protocol.	O4-199
5.2-1 Construction emissions (pp. 5.2-3 – 5.2-4)	SMAQMD basic practices, including a five-minute idling limit.	No localized dust controls at the nearest homes. No health risk assessment (III.E).	Wind-speed shutdown, dust monitoring at the east property line, notice to neighbors, Tier 4 Final engines, two-minute idling near homes.	O4-200
Missing measures	None.	No attendance cap, retention requirement for the screening tree row, levee review, or fuel-handling controls (II.B, III.B.2, III.E).	Adopt each as an enforceable measure.	O4-201

J. Alternatives

O4-202

The DEIR examines only the No Project Alternative and a substantially more construction-intensive relocation of the entire stadium and athletic fields. The latter moves stadium operations farther from the Parkway but closer to some residences and is predictably

found to create more construction impacts. This range does not provide a meaningful choice among designs and operating programs that could meet most project objectives while reducing the acknowledged significant noise impact and other Parkway and neighborhood effects.

O4-202 (Cont.)

The DEIR's only reported significant and unavoidable impacts are construction and operational noise, and the operational impact arises from "intermittent high-capacity events." Yet Alternative 2 is rated slightly greater for operational noise, and only the No Project Alternative would reduce stadium-event noise.[308] The DEIR also rejected the "Use Alternate Existing Stadiums" alternative because holding night games at another lighted stadium "would be similar to existing conditions" and would not reduce impacts "in a way that would be different from the No Project Alternative."[309] That reasoning turns the alternatives analysis on its head. As the DEIR itself acknowledges, the discussion of alternatives must focus on those "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."[310] Keeping the high-capacity events where they occur today is the most direct way to avoid the Project's significant noise impact. Yet the DEIR never considered the obvious split-venue alternative: practice-level lighting and improved seating at Raider Stadium, with varsity football remaining at El Camino High School and graduation at its existing off-site venue. Rio Americano already plays its night games at El Camino, about three miles away, where the stadium has high-mast lighting and capacity for up to 3,000 people.[311]

O4-203

The DEIR's further objection, that the District "does not have control over these facilities or their scheduling," concerns Hornet and Hughes Stadiums. It does not apply to El Camino, which is a District high school.[312] A split-venue alternative would meet the objectives of conducting outdoor student activities "during cooler parts of the day," increasing "flexibility for scheduling on-campus outdoor activities over the course of the day and evening," and optimizing "scheduling opportunities for athletic practices and competitions outside of normal classroom instruction times."[313] The Project Description itself attributes those benefits to lighting for the stadium's existing practices and games: the 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."[314] And because football crowds, the expanded public-address system, and graduation would stay off campus, the alternative

O4-204

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[308] DEIR, pp. 4.3-27, 6-13 – 6-14, 6-17 (Table 6-1), 7-14.

[309] *Id.* at p. 6-4.

[310] *Id.* at p. 6-1; CEQA Guidelines, § 15126.6, subd. (b).

[311] *Id.* at p. 1-2, 6-4; see id. at p. 3-8 (graduation "is held once annually at an off-site location").

[312] *Id.* at p. 6-4; see id. at p. 4.4-6 ("El Camino Fundamental High School"); San Juan Unified School District, El Camino Fundamental High School, Our School, available at: https://elcamino.sanjuan.edu/our-school.

[313] *Id.* at pp. 3-10, 6-3.

[314] *Id.* at p. 3-7.

would avoid most of the stadium-event noise that the DEIR finds significant and unavoidable, along with most of the event parking, queuing, and late-evening activity next to the Parkway. O4-204 (Cont.)

CEQA Guidelines section 15126.6(c) requires the EIR to identify alternatives that were considered and rejected and to explain why. Section 6.3 discusses only three: an off-campus stadium, morning scheduling, and other existing stadiums.[315] Commenters proposed others, none of which the DEIR mentions: O4-205

- a woodland buffer at the existing site, and moving the stadium north (Regional Parks);
- a reduced-height or reduced-illumination alternative, a no-permanent-lighting alternative, an earlier-curfew alternative and a reduced-capacity alternative (Bruce Kamilos, P.E., Feb. 2);
- turning the field from east–west to north–south to move seats and lights away from the Parkway (Peter Spaulding);
- shorter poles of about 40 feet with shielded fixtures (John Hervey);
- putting the press box on the north side instead of the south (Joe and Barbara Selewicz, Feb. 3).

The DEIR neither analyzes the above alternatives nor explains their rejection. The District should analyze a reduced-capacity and reduced-use alternative; an alternative with an earlier enforceable curfew and fewer amplified events; a no-amplified-sound or limited-public-address alternative; alternative seating, speaker, and barrier configurations; and a lighting alternative with lower spectral impact and stricter operating controls. The stated objectives are broad enough to accommodate a project that improves student athletic facilities without authorizing the maximum event intensity assumed in the DEIR.

The alternatives analysis also contains material internal inconsistencies that must be corrected before the alternatives can be compared meaningfully. The DEIR states that the existing stadium is approximately 125 feet from what the DEIR treats as the Parkway's edge (but see Section II.B) and that Alternative 2 would place the stadium approximately 875 feet from the Parkway. It nevertheless later states that Alternative 2's sports lighting would be "closer to" the Parkway.[316] Those statements cannot both be correct, and the error affects the comparative aesthetics, lighting, biological, and recreation analyses. Table 6-1 likewise rates the No Project Alternative "slightly greater" than the Project for "New Source of Light and Glare," although No Project would add no new source of light. It would have no 80-foot light poles, no upward-aimed ball trackers, and none of the five to eight additional nights of varsity football under lights that the Project would bring.[317] The DEIR reaches that rating by charging the No Project Alternative with spill from the existing portable lights, which are part of the baseline. Yet its aesthetics analysis treats the Project's own lighting as a potentially significant O4-206

[315] *Id.* at pp. 6-3 – 6-4.

[316] *Id.* at pp. 6-7, 6-14.

[317] *Id.* at pp. 6-6 – 6-7, 6-17 (Table 6-1); see id. at p. 3-4 [four light standards, "each would be 80 feet tall"].

impact requiring mitigation, and its biological comparison credits No Project with avoiding any "increase in operational lighting." O4-206 (Cont.)

The DEIR dismisses any biological advantage for Alternative 2 because relocating the stadium would involve more construction over a longer period.[318] As Dr. Smallwood explains, construction is temporary. The operational effects of lighting, event noise, and nighttime human activity would recur for the life of the Project. Moving the stadium some 750 feet farther from the Parkway would reduce those effects. The DEIR itself recognizes that Alternative 2 would reduce the visibility of the light standards from the Parkway.[319] The comparison must weigh recurring operational effects on Parkway wildlife, not only the duration of construction. O4-207

The conclusion that the No Project Alternative would meet none of the Project objectives is similarly overstated. Existing facilities already support student athletics, physical education, practices, competitions, and some community use. No Project may not fully satisfy objectives concerning permanent lighting, expanded seating, or hosting additional day and nighttime events, practices, and games, but it plainly serves some of the broader objectives to some degree. The comparison should distinguish objectives that would be partially satisfied from those that would not be achieved. O4-208

Finally, the asserted noise reduction benefit of Alternative 2's proposed 100-foot landscape buffer should be supported by an acoustical analysis. The DEIR does not explain the height, density, continuity, maturity, or other characteristics needed to produce that reduction, when those conditions would be achieved, or how they would be maintained in perpetuity. O4-209

The expert reports also provide a factual basis for evaluating lower-impact alternatives. The measures recommended by Dr. Smallwood include imposing limits on lighting color, the time lights stay on after events, and the number of lit nights, and an earlier event curfew. Mr. Watry recommends continuous public noise monitoring, bleacher damping, and absorptive bleacher walls. Mr. Johnson's finding that the campus lots cannot hold the traffic the LTA sends to them shows that attendance drives the parking and circulation effects unrecognized in the DEIR. The District should use this evidence to formulate and compare a reduced-capacity and limited-nighttime-operations alternative rather than limiting the analysis to No Project and relocation of the full-intensity stadium program. O4-210

At a minimum, the revised EIR should evaluate: O4-211

(1) a Reduced-Capacity Alternative within the approximately 1,250- to 1,400-seat range that the Board in 2010 found would meet all or substantially all of the project's objectives, and approved at 1,400 seats;

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[318] *Id.* at p. 6-8.

[319] *Id.* at p. 6-7; *see* Exh. B – Smallwood Report, p. 62.

(2) a Limited Nighttime Operations Alternative that retains safety, accessibility, and practice-lighting improvements but imposes an earlier mandatory curfew, caps attendance and illuminated nights, and excludes or sharply limits graduation, community events, bands, and amplified sound, while still meeting the objectives to "conduct outdoor student activities during cooler parts of the day" and to "[o]ptimize scheduling opportunities for athletic practices and competitions outside of normal classroom instruction times";[320] O4-212

(3) a Split-Venue Alternative that provides practice-level lighting and improved seating at Raider Stadium, while varsity football remains at El Camino High School and graduation remains at its existing off-site venue; and O4-213

(4) a hybrid alternative combining reduced capacity and use with lower-spectrum lighting, elimination of upward-facing ball-tracker fixtures, distributed speakers, acoustic barriers, and still-feasible mitigation adopted in 2010. O4-214

Each alternative should be compared quantitatively using the same attendance, schedule, lighting, noise, traffic, parking, and biological assumptions applied to the proposed Project. O4-215

IV. CONCLUSION O4-216

For the reasons stated above, RACA requests that the District revise the DEIR before certification to:

1. define and make enforceable the Project's maximum operating program, including attendance, event frequency, lighting, amplified sound, operating hours, egress, cleanup, and exceptions;

2. correct the environmental baseline and disclose the Project's relationship to the 2010 EIR, subsequent athletic-facility approvals, continuing mitigation obligations, and the 2024 Facilities Master Plan; O4-217

3. determine and analyze the whole of the action and the cumulative effects of related campus development, including the proposed telecommunications facility; O4-218

4. correct the premise that no special-status species occur on or near the site, expand the biological and other resource analyses to encompass the Parkway open space and habitat south of the levee, and analyze the effects of Project noise and lighting on the species present; O4-219

5. disclose how far event noise would exceed the County standards the DEIR adopts, analyze bleacher and structure-borne noise, and adopt a total-event noise standard with continuous monitoring, bleacher damping, and acoustic barriers; O4-220

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[320] DEIR, pp. 3-10, 6-3; *see id.* at pp. 3-7 [lighting for practices would "generally end by 8:00 P.M."], 4.1-26 [the DarkSky program on which Mitigation Measure 4.1-2 relies "[m]andates curfew requirements"].

6. identify all required County approvals or document a valid and applicable Government Code section 53094 override, and directly determine consistency with the Parkway Plan; and O4-221

7. adopt all feasible, objective, and enforceable mitigation and evaluate reduced-capacity, limited-nighttime-operation, and other reasonable alternatives capable of substantially reducing the Project's acknowledged impacts. O4-222

These omissions concern the Project description, baseline, geographic scope, mitigation, and alternatives and could disclose new or substantially more severe significant effects. O4-223

RACA further requests that the District respond individually and substantively to the findings and recommendations in the Smallwood, Watry, and Johnson reports; evaluate the field observations in the Eagle Sight Report; review the indexed supporting materials compiled by Ms. Heinz; and incorporate all submitted reports, imagery, footage, field data, indexes, and supporting documents into the administrative record. O4-224

The District should therefore revise and recirculate the affected portions of the DEIR as required by CEQA Guidelines section 15088.5 before the Board considers certification or Project approval. RACA also requests consultation with Sacramento County and the Parkway Manager and a public meeting on the revised analysis before Board action. O4-225

Contact Information: O4-226

Please direct all notices and correspondence concerning the DEIR and Project to the undersigned at the above referenced address and to RACA, Attn: Barbara Dugal, at riocommunityinfo@gmail.com. RACA also requests a courtesy emailed copy of the notice sent to the undersigned at Jason@holderecolaw.com.

Thank you for your consideration and for your attention to the above comments on the DEIR and request for notice. Please confirm receipt at your convenience.

Respectfully submitted,

Jason Holder
Counsel for Rio Americano Community Alliance

cc: (Via e-mail and U.S. Mail)
Sacramento County Regional Parks, Liz Bellas, Director (bellase@saccounty.gov)
Sacramento County Planning and Environmental Review (sacplan@saccounty.gov)
Supervisor Rich Desmond (richdesmond@saccounty.gov)
Save the American River Association (info@sarariverwatch.org)

Attachments:

Exhibit A: Eagle Sight Drone Intelligence Group, *Field Observation Report: Nighttime Light-Spillage & Event Activity Documentation, Jesuit High School/American River Drive Study Area* (observations of Sept. 4, 2026) [RACA will submit a media package (aerial photographs, video, and DJI telemetry files) at a later date.]

Exhibit B: Shawn Smallwood, Ph.D., *Biological Resources Assessment and Review of the Rio Americano High School Stadium Improvements Project Draft EIR* (SCH No. 2026010094), dated October 11, 2026, with *curriculum vitae*

Exhibit C: Derek L. Watry, M.S., M.B.A., Technical Director, Wilson Ihrig/RWDI, *Review of Noise Analysis in Rio Americano High School Stadium Improvements Project Draft EIR, SCH No. 2026010094* (RWDI #2605604), October 15, 2026, with product data sheets and résumé

Exhibit D: Grant Johnson, TE (TR 1453), Prism Engineering, *Traffic Engineering Services in Relation to a Review of Stadium Improvements at Rio Americano High School*, with Synchro calculations (App. A) and résumé (App. B)*l*, dated October 16, 2026

Exhibit E: Candice Heinz, Environmental Scientist, *Index of Field Data, Source Documents, Photographs, and Supporting Materials*, dated October 16, 2026

Exhibit F: Rio Americano Community Alliance, Rio Americano High School Athletic Facilities: Chronology of Improvements and Environmental Review, 2005–2026 (Oct. 2026)

Exhibit G: Matrix of Draft EIR Analyses Keyed to RACA's NOP Comments

Exhibit H: Table Summary Comparison Between the 2010 and 2026 Environmental Reviews

Exhibit I: Terracon Consultants, Inc., *CEQA Notice of Exemption and Categorical Exemption Memorandum* (Oct. 29, 2025)

Exhibit J: San Juan Unified School District Resolution No. 2521, Exempting the Rio Americano High School Sports Facility Project from the County of Sacramento Zoning Code (Apr. 27, 2010)

Letter O4A

Eagle Sight
Drone Intelligence Group

Nighttime Light-Spillage & Event Activity Documentation

O4A-1

Jesuit High School / American River Drive Study Area

Client	R.A.C.A.	**Attention**	Barbara Dugal
Observation Date	September 4, 2026	**Field Window**	7:20 PM setup; 7:30-11:00 PM observation
Prepared By	Eagle Sight Drone Intelligence Group	**Report Type**	Visual aerial documentation
Primary Focus	Traffic, parking, pedestrian activity, visible light spill	**Study Area**	Jesuit HS and requested surrounding corridors

EXECUTIVE SUMMARY

Eagle Sight Drone Intelligence Group conducted nighttime aerial observations during the scheduled sports-event period to document visible lighting conditions and observable activity in the requested study area. The supplied imagery shows a pronounced contrast between the illuminated athletic facility and surrounding lower-light residential and roadway areas. Field notes also record periods of substantial parking activity along American River Drive and Jacob Lane and later traffic activity near the close of the observation period. This report is descriptive and evidence-based; it does not determine legal compliance, quantify illuminance, identify individuals, or attribute traffic or parking activity to a specific cause beyond what was directly observed.

1. Scope and Objective

The assignment was to create time-referenced aerial photo and video documentation of traffic, parking, pedestrian activity, and visible light spillage associated with the sports event at Jesuit High School, with attention

to American River Drive, Jacob Lane, Saverein Drive, Regents Park Drive, Morris Way, and the parkway area along the rear of Rio Americano High School. Observations were intended to provide an objective visual record of conditions during the stated field window.

O4A-1 (Cont,)

2. Methodology and Limitations

Aerial observations were conducted at multiple times and viewpoints during the event period. Still photographs and video were collected to provide broad-area context and closer visual documentation of the athletic facility, adjacent tree lines, roadways, parking areas, and surrounding neighborhoods.

The chronology distinguishes original DJI still-image file timestamps from field-note times. The supplied still photographs are timestamped September 4, 2026, 7:58:51–8:29:01 PM (camera metadata; camera-clock accuracy and time-zone configuration have not been independently validated). Video files and their metadata were not available in the materials reviewed for this revision. Field-note video times are therefore not independently verified.

Light spillage is described visually as apparent illumination extending beyond the principal athletic-field area. No calibrated lux or foot-candle meter data were provided; therefore, this report does not quantify illuminance or make a photometric-compliance determination.

Observations of traffic, parking, and pedestrian activity are snapshots of conditions at specific times. They are not a traffic-engineering count, origin-destination study, or determination of why any individual vehicle or person was present.

3. Chronology of Recorded Observations

Time	Recorded observation	Media
7:50 PM	Initial American River Drive flight (field-note time; video metadata not supplied).	Field note; video unverified
7:58:51–8:04:42 PM	Verified photo series documenting illuminated stadium and surrounding areas.	DJI stills 0003–0009; file timestamps
8:15 PM	Second American River Drive flight (field-note time; video metadata not supplied).	Field note; video unverified
8:20 PM	Field-note photo time; actual supplied stills at 8:21:44–8:29:01 PM.	Field note vs. verified photo metadata

O4A-1 (Cont,)

Time	Recorded observation	Media
8:21:44–8:29:01 PM	Verified second still-photo series; includes Figures 3 and 4.	DJI stills 0012–0019; file timestamps
8:30 PM	Tree-line video (field-note time; video not available for verification).	Field note; video unverified
8:40 PM	Heavy parking reported along American River Drive and Jacob Lane; not an independently timed photo finding.	Contemporaneous field note
8:48–8:50 PM	North-side photo series reported in field notes; corresponding original files not supplied for timestamp verification.	Field note; not independently verified
9:05 PM	North-side photographs reported; original files not supplied for verification.	Field note; not independently verified
9:55 PM	Late-evening traffic video reportedly captured; recording not supplied for independent review.	Field note; video unverified
10:05 PM	Additional American River Drive observation; source field note partially unclear.	Field note; unverified
10:06 PM	Fair Oaks Boulevard-area video reportedly captured; recording not supplied for review.	Field note; video unverified

4. Objective Findings

Athletic-field illumination

The supplied nighttime imagery depicts the athletic field and track as substantially brighter than the surrounding residential and roadway environment. Bright illumination is concentrated around the field perimeter and spectator/track areas.

Visible off-field illumination

The images show visible illumination outside the playing surface, including portions of the track, adjacent open areas, tree lines, access/parking areas, and nearby ground surfaces. The degree of illumination varies by viewing direction and distance.

Transition at surrounding tree lines

O4A-1 (Cont,)

Several views show a distinct transition from the brightly illuminated athletic complex to darker areas beyond surrounding vegetation and property edges. The imagery documents the spatial relationship but does not establish measured light levels at a property line.

Parking conditions

A field note timed 8:40 PM reports heavy parking along American River Drive and Jacob Lane. Supplied aerial still photographs show vehicles and roadway context, but the still-photo files were captured no later than 8:29:01 PM; they should not be described as 8:40 PM photographic proof.

Traffic activity

During my late-evening aerial observations on September 4, 2026, I observed that the majority of vehicular activity was concentrated around vehicles exiting the Jesuit High School parking lot toward Fair Oaks Boulevard.

From my aerial vantage point, I observed a greater concentration of vehicle movement along the Fair Oaks Boulevard access route as individuals departed the school property following the sporting event.

In comparison, I observed considerably less vehicular congestion along American River Drive. Traffic along this roadway appeared relatively light during the same general observation period.

However, I observed a more noticeable pedestrian presence along American River Drive. Although vehicular traffic was lighter in this area, pedestrian movement was more prominent than along the other roadway areas I observed.

Based on my firsthand observations as the Remote Pilot in Command, I noted a distinction between the concentration of departing vehicle traffic near Fair Oaks Boulevard and the increased pedestrian presence along American River Drive.

These statements reflect my direct visual observations during the assignment. I did not conduct formal vehicle or pedestrian counts, measure traffic speeds, or perform a traffic-engineering analysis. My observations should not be interpreted as establishing the destinations of individual vehicles or the purposes of pedestrian movements.

Field notes reference late-evening recordings at approximately 9:55 PM and 10:06 PM; the original video files were not available for independent timestamp verification.

Pedestrian activity

The mission scope included observable human activity. Individuals visible in the aerial material are treated only as aggregate scene activity; this report does not identify, track, or characterize specific persons.

5. Representative Visual References

O4A-1
(Cont,)



Figure 1. Wide-area nighttime aerial view showing the illuminated athletic field relative to surrounding lower-light residential and roadway areas. The roadway imagery was captured from an aerial traffic-observation vantage point along American River Drive. Source: DJI_20260904200442_0009_D.JPG.

O4A-1
(Cont,)



Figure 2. Aerial view documenting the transition from the illuminated athletic complex toward adjacent residential streets and roadway areas. The roadway imagery was captured from an aerial traffic-observation vantage point along American River Drive. Source: DJI_20260904200402_0008_D.JPG.



Figure 3. Aerial context view documenting roadway and parking conditions adjacent to the athletic complex. The roadway imagery was captured from an aerial traffic-observation vantage point along American River Drive. Source: DJI_20260904202901_0019_D.JPG.

O4A-1
(Cont,)

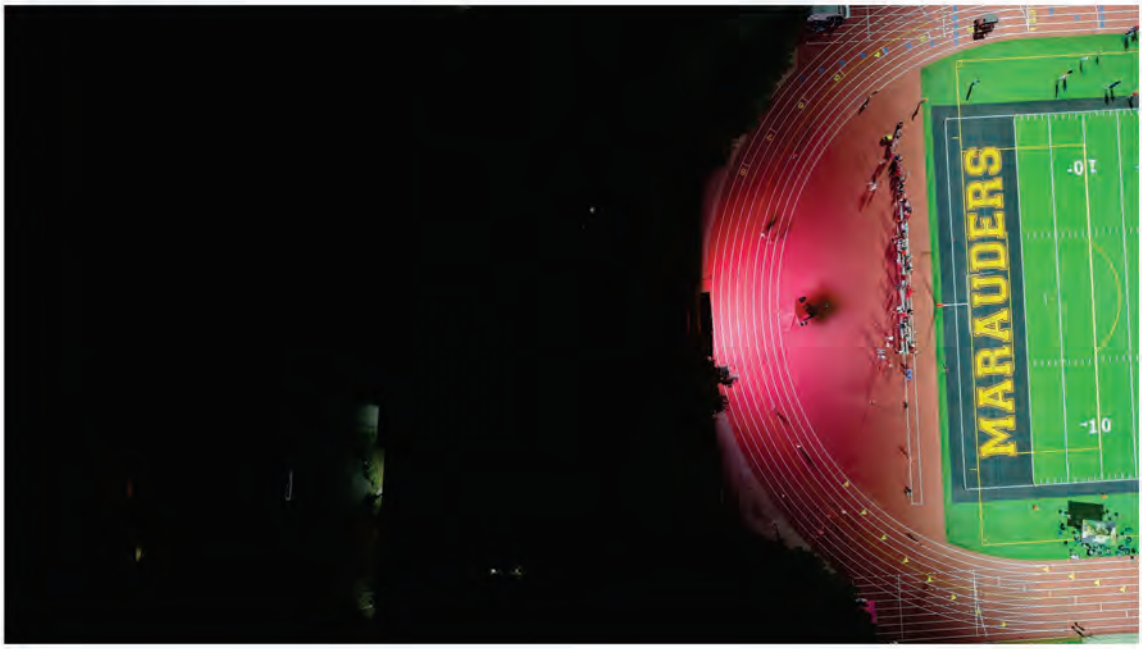


Figure 4. Near-vertical nighttime view documenting the contrast between the illuminated field/track and the darker area beyond the western tree line. Source: DJI_20260904202231_0013_D.JPG.

6. Media Package Reference

The original media package is referenced as the source of aerial photographs and video recordings. For this revision, 15 original DJI JPG files (DJI_20260904195851_0003_D.JPG through DJI_20260904202901_0019_D.JPG, with gaps in sequence) were available for timestamp inspection. The video recordings, their embedded timestamps, and DJI subtitle/telemetry files were not available for independent review. Statements concerning those recordings remain attributed to field notes rather than independently verified media.

7. Conclusion

The September 4, 2026 operation produced original aerial still photographs documenting the illuminated Jesuit High School athletic facility and surrounding visible conditions. The photographs support qualitative observations only, not quantified light trespass, traffic counts, or causal conclusions. The later field-note events and video descriptions require corroboration from original video files before being presented as independently verified.

8. Media Correlation Note

Original filenames and embedded metadata should accompany any evidentiary submission. Supplied DJI JPG timestamps were checked against the report chronology. Later video timestamps, video descriptions, and any disputed street identifications require comparison with original recordings and geospatial/location evidence before being certified as verified. The original files, rather than this narrative, control.

O4A-1
(Cont,)

9. Street Identification and Verification Status

Based on my firsthand identification of the streets depicted in the report photographs, I identify the roadway shown in those photographs as American River Drive. Jacob Lane is separately referenced in my contemporaneous parking field note, and Fair Oaks Boulevard is referenced in my late-evening traffic observations. The photographs are preserved without alteration. Street identification is based on my field knowledge and should not be mistaken for independent geospatial verification. The roadway photographs in Figures 1–3 were captured from my aerial traffic-observation vantage point along American River Drive; this identifies the observation perspective and does not imply that the aircraft was positioned on the roadway.

10. Preparer Identification and Attestation

Prepared by: Eric Carolina, Remote Pilot in Command (FAA Part 107), Eagle Sight Drone Intelligence Group LLC.

I attest that this report identifies the observations and source materials reviewed, distinguishes verified image timestamps from unverified field-note entries, and does not purport to provide calibrated photometric or traffic-engineering measurements.

Signature: Eric Carolina Date: 10/16/2026

Supporting attachment (separate document): Eric Carolina — Professional Qualifications and Curriculum Vitae. FAA Remote Pilot Certificate may be supplied separately.

Photographic integrity verification

Figures 1–4 contain the original DJI camera JPG files without image enhancement, retouching, cropping, annotation, or color adjustment. The images are displayed at their original 16:9 aspect ratio. Their source filenames, in figure order, are:

Figure 1: DJI_20260904200442_0009_D.JPG

Figure 2: DJI_20260904200402_0008_D.JPG

Figure 3: DJI_20260904202901_0019_D.JPG

Figure 4: DJI_20260904202231_0013_D.JPG

The photographic content has not been changed to identify streets or observation vantage points; those descriptions appear only in the report text and captions.

Letter O4B

To: Jason W. Holder, Holder Law Group

From: Shawn Smallwood, PhD

Date: 11 October 2026

RE: Biological Resources Assessment and Review of the Rio Americano High School Stadium Improvements Project Draft EIR (SCH No. 2026010094)

I write to comment on potential impacts on biological resources that would result from development of the proposed Rio Americano High School Stadium Improvements Project, which would add new bleachers to increase seating capacity from the current 288 people to 2,575 people, as well as a press box that would extend the bleachers >30 feet above ground, four 80-foot-tall, high-mast light standards, new 15-foot-tall light standards along the paved fire lane, and an upgraded public address system. My comments that follow address my objections that the Draft Environmental Impact Report (DEIR), which is supported by a report of a bat survey (Fettke 2026), mischaracterizes the existing environmental setting, and that its impacts analysis is flawed and its mitigation measures are inadequate. O4B-1

My qualifications for preparing expert comments are the following. I hold a Ph.D. degree in Ecology from University of California at Davis, where I also worked as a post-graduate researcher in the Department of Agronomy and Range Sciences. My research has been on animal density and distribution, habitat selection, wildlife interactions with the anthrosphere, and conservation of rare and endangered species. I authored many papers on these and other topics. I served as Chair of the Conservation Affairs Committee for The Wildlife Society – Western Section. I am a member of The Wildlife Society, and I've lectured part-time at California State University, Sacramento. I was Associate Editor of wildlife biology's premier scientific journal, The Journal of Wildlife Management, as well as of Biological Conservation, and I was on the Editorial Board of Environmental Management. I have performed wildlife surveys in California for 41 years. My CV is attached. O4B-2

EXECUTIVE SUMMARY

O4B-3

My comment raises the following issues related to the biological resources assessment in the DEIR.

1. Although priority is directed to special-status species, all native wildlife are of concern in a CEQA review, because all wildlife compose the ecological communities needed for special-status species to reproduce and survive. Yet, the only field survey conducted in support of the DEIR was a cursory survey for bats, using low-grade equipment and field-fitting the extension of the survey into the American River Parkway without explaining the basis of the field-fitting.

2. The appropriate study area for analysis of project impacts on wildlife would include the Rio Americano Area of the American River Parkway, but the DEIR mostly and inappropriately restricts its analysis to the High School athletic fields. O4B-4

3. I surveyed for wildlife for nearly 22 hours on multiple dates and times of day and night to detect 127 species of vertebrate wildlife, and to obtain the basis for predicting that many more species of wildlife rely on the Rio Americano Area than those I detected. Including another site I surveyed only one mile north, I have detected 178 species of vertebrate wildlife at and near the Rio Americano Area, inclusive of 43 special-status species. O4B-5

4. I detected 10 species of bats (9 with confirmed species identity and 1 probable), which is more than three times the number detected by the bat surveys conducted in support of the DEIR. O4B-6

5. Compared to many other wildlife surveys I have completed in the region, my survey findings on the Rio Americano Area stand out, far exceeding my estimated 95% confidence intervals, and quantitatively revealing that the Rio Americano Area supports a spectacular wildlife community. O4B-7

6. In contrast, the findings of the bat survey conducted in support of the DEIR were not compared to any other survey results, thereby depriving the readers of context and meaning of the findings. O4B-8

7. The DEIR fails to adequately describe the trees along the south edge of the athletic fields, such as heights and canopy densities, and this failure is significant because the DEIR repeatedly claims that these trees would prevent project-generated light and noise from affecting wildlife in the Parkway. O4B-9

8. The DEIR misuses the California Natural Diversity Data Base to derive its pool of special-status species for further analysis of occurrence likelihoods, and it also defines its study area too narrowly. Many of the wildlife species disregarded by the DEIR actually occur in the Rio Americano Area, and too many of those included in the DEIR's analysis resulted in inaccurate occurrence likelihood determinations. O4B-10

9. The DEIR's analysis of noise impacts on wildlife is incomplete, and so is its analysis of light impacts on wildlife. O4B-11

10. The DEIR fails to estimate the project's impacts on the productive capacity of wildlife on the Rio Americano Area, and it too often relies on speculation to analyze these potential impacts on wildlife movement in the region. O4B-12

11. The DEIR's mitigation strategy is flawed, relying on an inaccurate characterization of the wildlife community as part of the existing environmental setting, and focusing on measures that would provide *de minimis* conservation benefits relative to potential project impacts. O4B-13

12. Needed are measures to restrict the use of lights and the number and scheduling of events to be lit at night, the use of the Parkway by event attendees after dark, and the measurement of project impacts on bats linked to actionable thresholds of project impacts. O4B-14

13. DEIR Alternative 2 would be the environmentally superior alternative to the Preferred Alternative. O4B-15

THE WILDLIFE COMMUNITY AS A BIOLOGICAL RESOURCE

O4B-16

Before I comment specifically on the project, I reassess a key subject in CEQA review, because it too often gets divorced from its intended purpose. This subject is special status assigned to a biological species to signify the species' natural rarity, special place in the food web, e.g., raptors, numerical decline or range contraction, or jeopardy of extirpation or extinction, i.e., endangerment. I further assess the spatial extent of the project area, because members of most species of wildlife operate at spatial scales that usually far exceed the project boundary such as the one defined in the DEIR, and because project impacts often extend beyond the boundaries defined by lead agencies.

O4B-17

Most environmental reviews pursuant to the California Environmental Quality Act (CEQA) focus on special-status species because CEQA's Checklist Evaluation of Environmental Impacts Question IV(a) asks specifically whether the project would adversely affect special-status species. This narrowly focused question is part of a larger policy goal of CEQA, which is "to prevent the elimination of fish or wildlife species due to man's activities, insure that fish and wildlife populations do not drop below self-perpetuating levels, and preserve for future generations representations of all plant and animal communities and examples of the major periods of California history." Pub. Res. Code § 21001(c). This policy is not restricted to special-status species; it also applies to wildlife populations and plant and animal communities, as it must because special-status species are integral members of ecological communities. CEQA defines wildlife habitat as "the ecological communities upon which wild animals, birds, plants, fish, amphibians, and invertebrates depend for their conservation and protection" (Pub. Res. Code § 21155.1 (a)(2)(C) (ii)). This definition is consistent with the scientific definition of habitat, which is that portion of the environment that is used by members of a species for survival and reproduction (Hall et al. 1997). An essential portion of the environment used by any special-status species is composed of the collection of other species of plants and wildlife, because these species provide for special-status species their forage, refugia and nest substrates, and some serve as ecological mutualists; no special-status species can exist in a vacuum of other wildlife. The CEQA Checklist Evaluation assigns priority to special-status species to balance information and cost, but it does not exclude the need to evaluate environmental impacts to other species, which, after all, are members of the very communities within which special-status species inter-depend for survival and reproduction.

O4B-18

The species I consider to be special-status species are those listed in California's Special Animals List inclusive of threatened and endangered species under the California and

federal Endangered Species Acts, candidates for listing under CESA and FESA, California's Fully Protected Species, California species of special concern, and California's Taxa to Watch List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406), and continental and region-specific US Fish and Wildlife Service Birds of Conservation Concern (https://www.fws.gov/sites/default/files/documents/ birds-of-conservation-concern-2021.pdf). Additional species I consider to be special-status species are those recognized to be naturally rare such as raptors protected by California's Birds of Prey laws, Fish and Game Code Sections 3503, 3503.5, 3505 and 3513 (see https://wildlife.ca.gov/Conservation/ Birds/Raptors). O4B-18 (Cont.)

Most species of wildlife, whether special-status or not, function at spatiotemporal scales that are larger than most proposed projects, thus confounding attempts to isolate a project's effects on wildlife to just the area within a project boundary. Most animal populations are spatially dynamic under natural conditions, meaning their centers of activity shift locations every generation or so to rest resources, avoid excessive predator and parasite loads, and due to dispersal of young from natal populations to form new populations as the natural populations senesce (Taylor and Taylor 1979). Even pocket gophers, which live singly in burrow systems that seemingly remain static, disperse to form new populations in new locations, typically occupying only a quarter of available habitat at a given time (Smallwood et al. 2001, Smallwood 2002). Species of raptors also shift locations, and so do species of Mammalian Carnivora. A species might be absent from a site at a given time, but it can be present when considered over a longer term. Likewise, project impacts on wildlife are often not confined to the construction footprint, often spilling over into adjacent or nearby habitat. Examples include light and noise pollution, and project-generated automobile and pedestrian traffic. In the case of this project, wildlife from the American River Parkway often occur on the project site, and the project's impacts would affect wildlife on the American River Parkway. What I regard as the project area is the DEIR's project site combined with what County of Sacramento (2006) refers to as the Rio Americano Area, and more specifically that portion of the Rio Americano Area that is within 500 feet of the south extent of the DEIR's project site. The 500-foot contour is consistent with Fettke's (2026:2) defined study area, which was based on her initial prediction of how far project-generated light and noise unobstructed by trees might travel into the Rio Americano Area. O4B-19

What follows is a summary of several site visits I made to detect as many of the available species of wildlife as possible within the short time available. The surveys were also intended to detect as many of the special-status species as possible, but with the understanding that most special-status species are less readily detectable due to rarity and crypticity. Nonetheless, the species detected can indicate the ecological integrity of the site and thus the likelihood of occurrence of special-status species not yet detected. O4B-20

SITE VISITS

I visited the site of the proposed project, including the athletic fields and the Rio Americano Area south of the stadium, for 3.75 hours of survey starting at 06:48 on 10 February 2026, 2.25 hours of evening survey starting at 16:38 and 3.45 hours of nocturnal survey (UTM NAD83 643580 E, 4271103 N) starting at 19:42 on 24 March

2026, 3.8 hours of survey starting at 06:36 on 30 April 2026, 1.25 hours of evening survey starting at 19:43 and 3.25 hours of nocturnal survey (643515 E, 4271072 N) starting at 20:50 on 4 June 2026, and 1 hour of evening survey starting at 18:43 and 3 hours of nocturnal survey (643422 E, 4271041 N) starting at 19:40 on 10 September 2026. In daylight hours, I walked in accessible portions of the study area, stopping to visually scan for wildlife with the aid of binoculars. At night, I affixed a Pettersson M500 acoustic bat detector to a 5-m pole, and cabled the detector to my computer, which ran SonoBat Live to identify bats to species based on the bats' sonograms. I recorded all species of vertebrate wildlife I detected, including those whose members flew over the site. Conditions were typical of the times of day and year when I visited. The portion of the site where the stadium would be constructed is covered by mowed lawn on athletic fields, and it is bordered to the south by mature ornamental trees, and that portion of the site that would be affected by project activities extending to Rio Americano Lagoon is covered by elderberry and coyote bush savannah and riparian forest (Photos 1–3).

O4B-20 (Cont)

O4B-21

Many of the wildlife I observed traveled between the Rio Americano High School athletic fields and the Rio Americano Area, such as large flocks of yellow-billed magpie, Nuttall's woodpecker, acorn woodpecker, black phoebe, large flocks of house finches, American crows, red-tailed hawks, mourning doves, western bluebirds, cedar waxwings, tree swallows, cliff swallows, California scrub-jay, wild turkey, a bobcat, and as indicated by tracks, coyote and fox. Due to skyglow and my position on the upper terrace of the Rio Americano Area during my third nocturnal survey, I was able to see bats flying over the levee to and from the athletic fields before dusk transitioned to night, but although I identified bats using my Pettersson M500 bat detector and Sonobat Live, I could not determine which species of bats flew north of the levee.

O4B-22

As noted above, the skyglow was bright. Although I brought a headlamp with me during nocturnal surveys on the Rio Americano Area, I did not need to use it due to the brightness of the skyglow. Just with the aid of skyglow, I saw bats and owls, and I could even identify the owls to species based on visual observation alone. I also note that an exceedingly bright light penetrated the project area's riparian forest from the High School campus, casting starkly contrasting shadows throughout the project area. Such shadows can be confusing, hence interfering with the foraging of some species, and misperceived urgency to flush or flee.

O4B-23

During one of my nocturnal surveys, about 40 teenagers were also present on the Lagoon of the Rio Americano Area until at least midnight, which is when I departed. I expect that with more events attended by more people following the stadium expansion, there is likely to be more visitation of the Parkway at night. I also noticed the use of electric bikes on the bike path after dark, including some ridden at high speeds without lights, thereby posing collision threats to wildlife. The DEIR (pp. 4.21, 4.5-1, 7-6) claims, "There is no vehicular access to the portion of the Parkway near the Rio Americano High School campus," but it does not consider e-bikes. If the project increases stadium attendance by those using electric bikes along the Parkway, then wildlife collision mortality will increase.

O4B-24

I observed that many birds rely on vocalizations for courtship (Photos 4 and 5), alarm-calling, and in maintaining contact with chicks (Photos 6 and 7). It is essential for wildlife to be able to hear each other, to hear the sounds of approaching danger, and in the case of bats, to hear the echoes of their own sound pulses used in travel, social communication, and foraging. Crowd noise could interfere with wildlife reliance on sound, and fast-moving electric bikes could fail to alert wildlife of imminent risk of collision.

O4B-25





Photos 1 and 2. *Views of the Rio Americano Area, 10 February 2026. These photos were taken from about 348 feet south of the south fence of the football stadium.*

O4B-26



O4B-27

Photo 3. *Mule deer on the Rio Americano Area, 4 June 2026.*



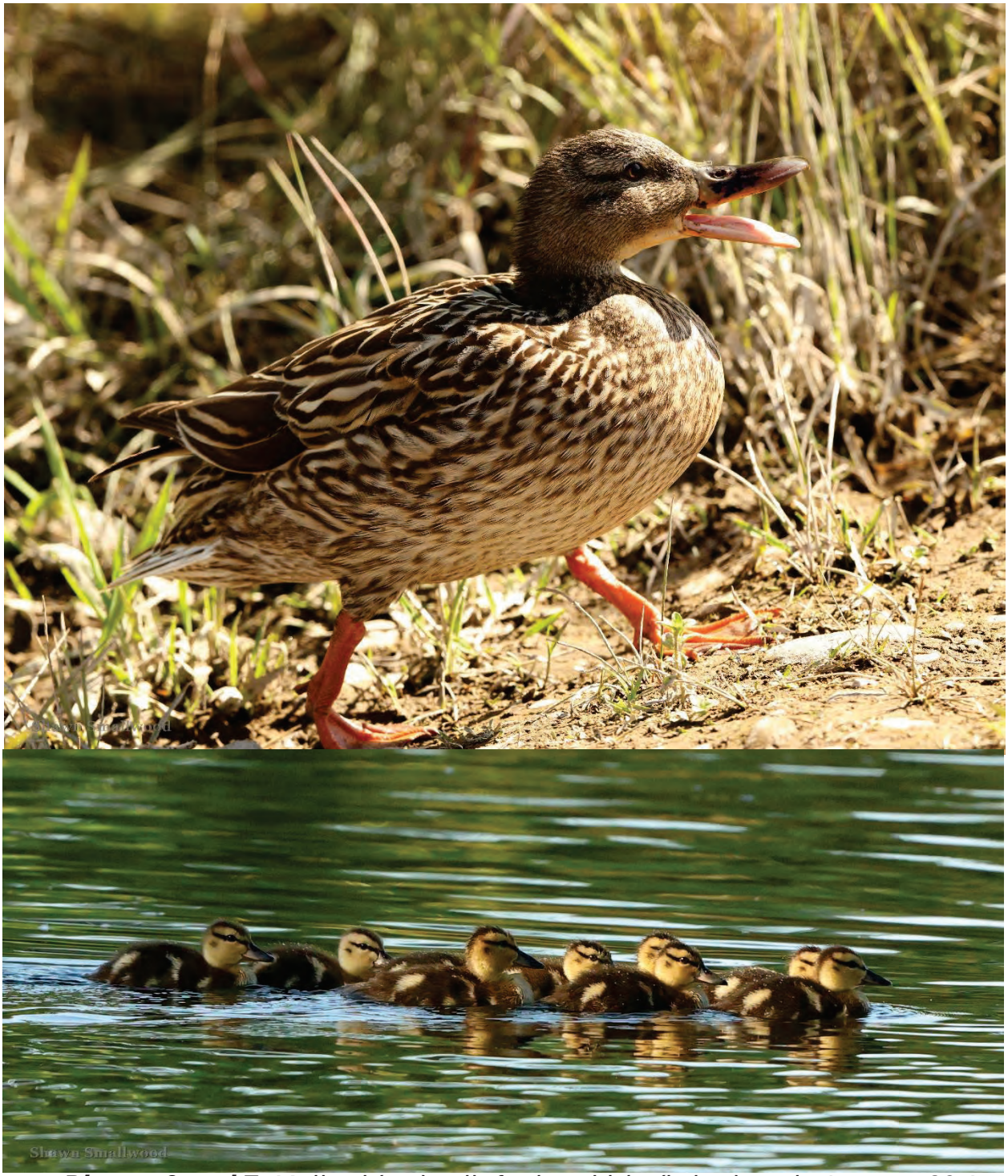
O4B-28

Photo 4. *A Canada goose calls for its mate on the Lagoon, 10 February 2026*.



Photo 5. *Warbling vireo mate-calling on the Rio Americano Area, 30 April 2026*.

O4B-29



Photos 6 and 7. *Mallard (top) calls for her chicks (below) on the Lagoon, 30 April 2026.*

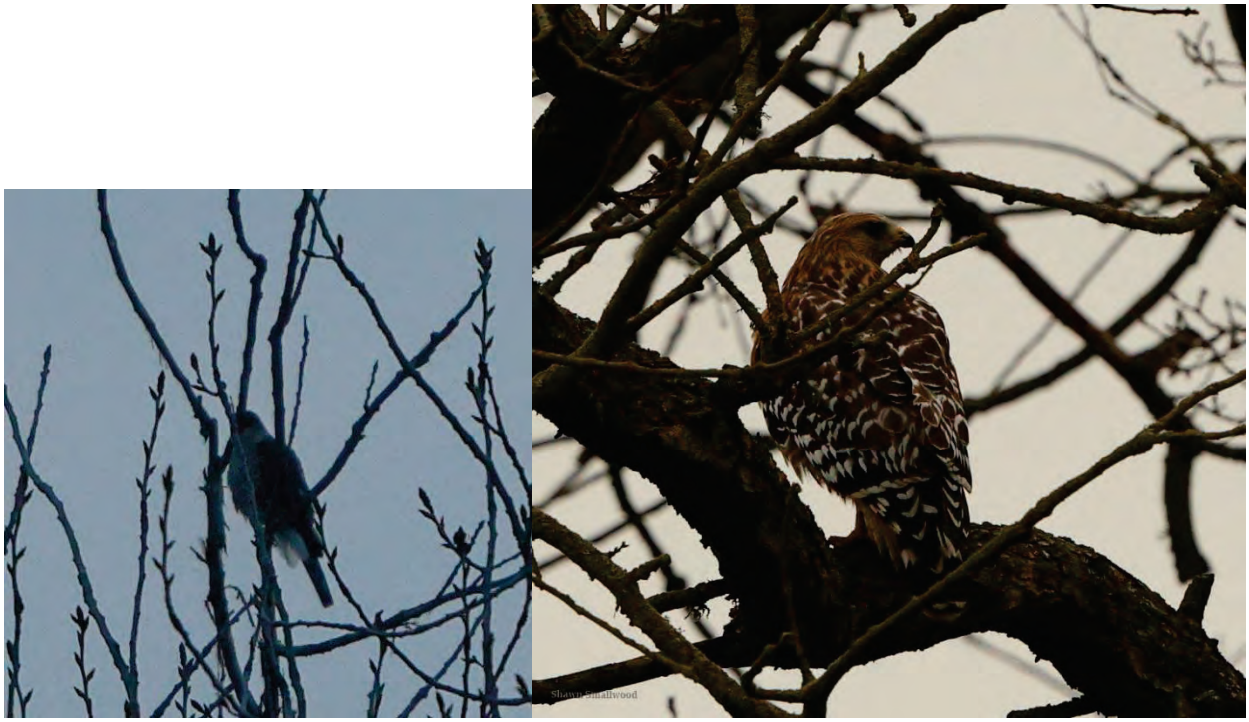
I also saw sharp-shinned hawk and red-shouldered hawk (Photos 8 and 9), great blue heron and snowy egret (Photos 10 and 11), great egret and bufflehead (Photos 12 and 13), pied-billed grebe (Photos 14 and 15), wood duck and Anna's hummingbird (Photos 16 and 17), common goldeneye and common merganser (Photos 18 and 19), desert

cottontail and American beaver (Photos 20 and 21), double-crested cormorant and cackling goose (Photos 22 and 23), California quail and spotted towhee (Photos 24 and 25), California gull and California ground squirrel (Photos 26 and 27), bushtit and California scrub-jay (Photos 28 and 29), osprey and mute swan (Photos 30 and 31), Wilson's warbler and northern house wren (Photos 32 and 33), and golden-crowned sparrow (Photo 34). I detected 127 species of vertebrate wildlife inclusive of 26 species with special status (Table 1). Additionally, over 40 field surveys only one mile north of the project area from 2021 through 2023, I detected another 51 species inclusive of another 17 special-status species of vertebrate wildlife (Table 2). Altogether, I have detected 178 species of vertebrate wildlife inclusive of 43 special-status species within one mile of the project area. I also observed a large heron rookery only one mile north of the project area in 2020-2023.

O4B-30 (Cont)

Of the observations I made of wildlife on and near the project area, many involved foraging activities. Many involved courtship, breeding and rearing of young. Many involved roosting, and many of these undoubtedly included birds on migration that happened to have stopped over. Many involved wildlife on the move, indicative of the project area's importance to wildlife movement in the region. All these observations serve as evidence of the site's role as wildlife habitat. That the site is important habitat to many species of wildlife is not lost on the public, either, as I observed many people visiting the site with binoculars or cameras. Some visitors were highly knowledgeable, naming the bird I was looking at (one was the sharp-shinned hawk in Photo 8). Many observations of wildlife on the Rio Americano Area are also reported on eBird and iNaturalist, indicative of high public interest in this species-rich place.

O4B-31



Photos 8 and 9. *Sharp-shinned hawk (left), red-shouldered hawk (right) on the Rio Americano Area, 10 February 2026*.

O4B-32





Photos 10 and 11. *Great blue heron (top) and snowy egret on the Rio Americano Area, 10 February 2026*.

O4B-33

Photos 12 and 13. *Great egret (top) and bufflehead (bottom) on the Rio Americano Area, 10 February 2026*.









Photos 14 and 15. *Pied-billed grebes foraging on the Rio Americano Area, 10 February 2026*.

Photos 16 and 17. *A breeding pair of wood ducks on the Rio Americano Area (top), and Anna's hummingbird on the upper terrace of the Rio Americano Area, 30 April 2026.*







Photos 18 and 19. *Common goldeneye (top) and common merganser on the Rio Americano Area, 10 February 2026*.





Photos 20 and 21. *Desert cottontail on the upper terrace portion of the Rio Americano Area, 24 March 2026 (top), and evidence of American beaver on the Rio Americano Area, 10 February 2026*.



Photos 22 and 23. *Double-crested cormorant on the Rio Americano Area, 24 March 2026 (top), and cackling goose on the Rio Americano Area, 10 February 2026*.





Photos 24 and 25. *California quail (top) and spotted towhee on the Rio Americano Area, 24 March and 30 April 2026.*

O4B-40





Photos 26 and 27. *California gull on the Rio Americano Area, 10 February 2026 (top), and California ground squirrel on the Rio Americano Area, 30 April 2026.*

O4B-41





Photos 28 and 29. *Bushtit (top) and California scrub-jay on the Rio Americano Area, 30 April and 10 February 2026*.

O4B-42



Photos 30 and 31. *Osprey carrying fish (top) and mute swans on the Rio Americano Area, 10 February 2026*.

Photos 32 and 33. *Wilson's warbler (top) and northern house wren on the Rio Americano Area, 30 April 2026*.







Photo 34. *Golden-crowned sparrow on the Rio Americano Area, 24 March 2026*.

O4B-45

Ten of the wildlife species I detected were species of bats (Table 1), including big brown bat, desert red bat, and silver-haired bat (Photos 35-37), California myotis, little brown bat, and Mexican free-tailed bat (Photos 38-40), and Yuma myotis and long-legged myotis (Photos 41 and 42). Sonobat confirmed the species identities of all but long-legged myotis, which Sonobat suggested as long-legged myotis and which I classified as probable after manually vetting the sonogram. In 2024 I detected Western mastiff bat only one mile north of the project area (Table 2). The emergence of bats each night would severely suppress the mosquitoes, to my relief, as the mosquitoes must be capable of hearing the foraging calls of the bats (humans cannot hear them, for the most part).

O4B-46

O4B-47

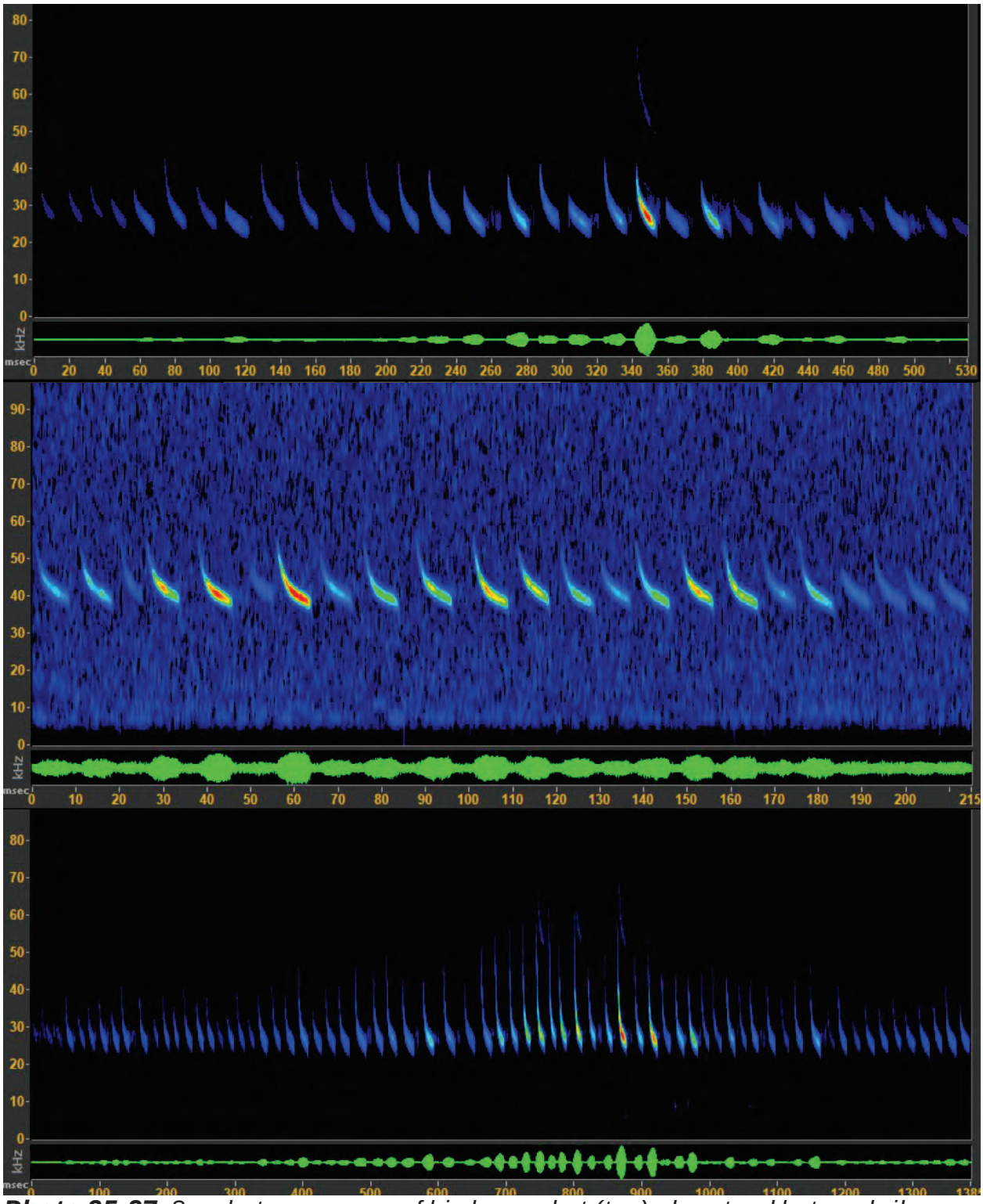
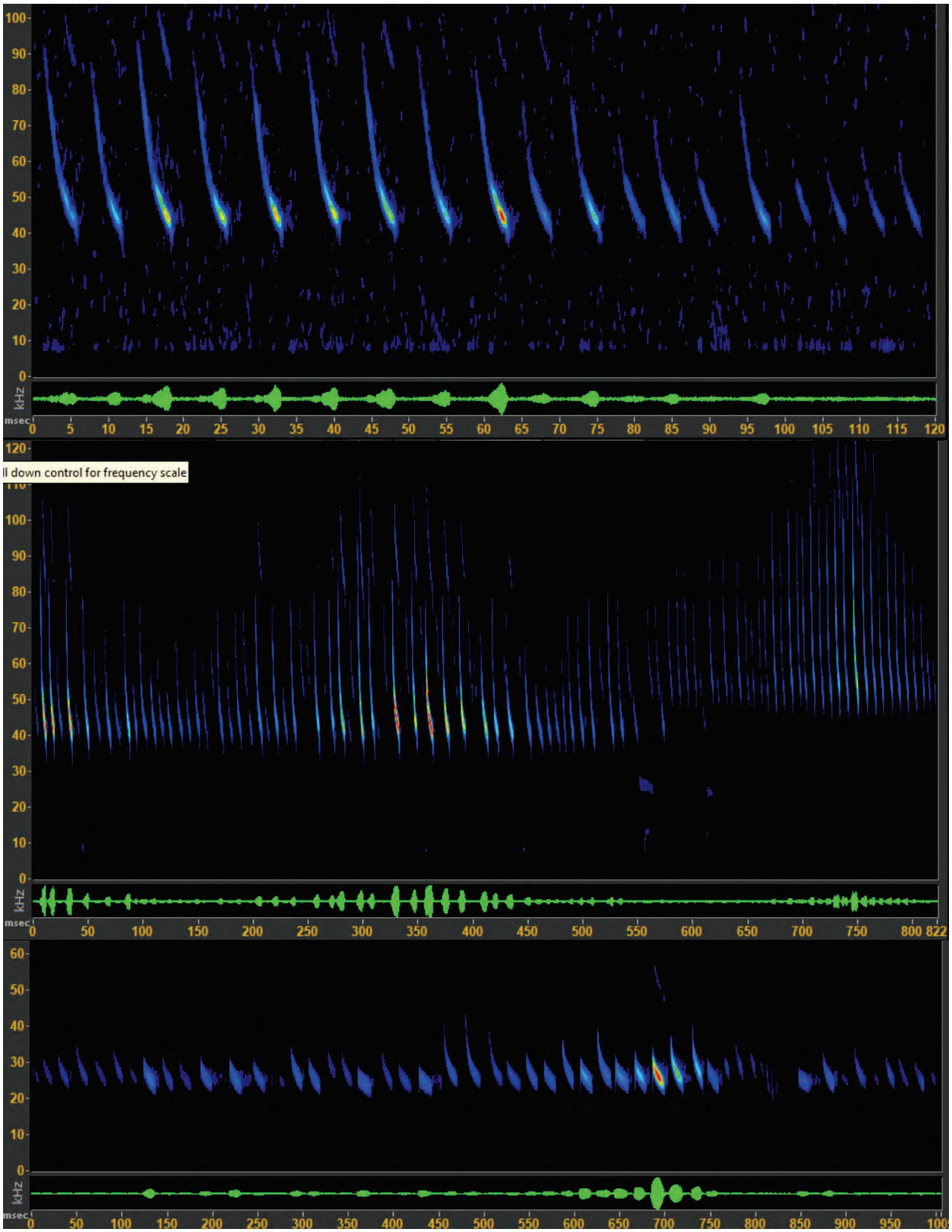
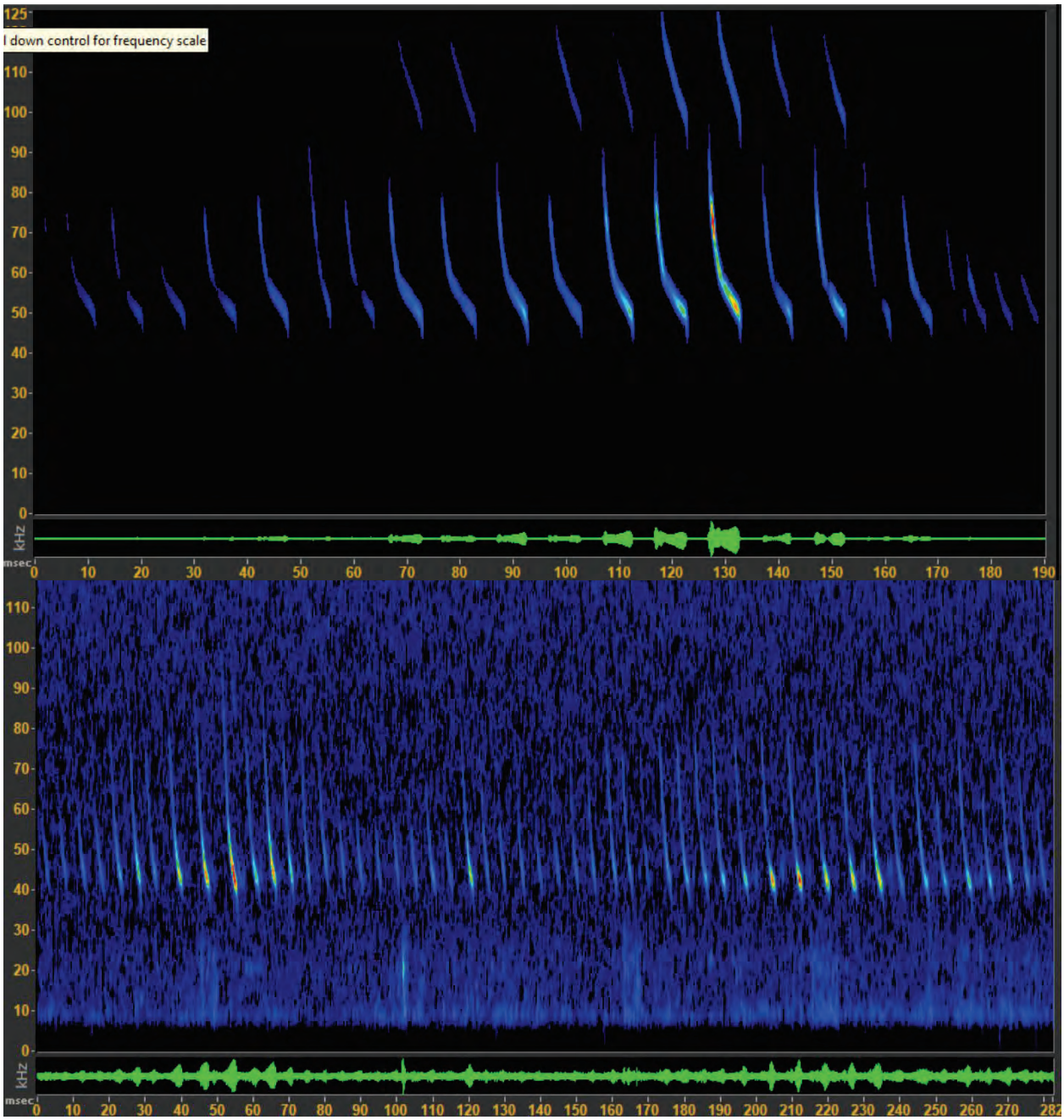


Photo 35-37. *Sonobat sonograms of big brown bat (top), desert red bat, and silver-haired bat (bottom) on the Rio Americano Area, 10 September 2026.*

O4B-48



Photos 38-40. *Sonobat sonograms of California myotis (top), little brown bat, and Mexican free-tailed bat (bottom) on the Rio Americano Area, 10 September 2026.*



O4B-49

Photos 41 and 42. *Sonobat sonograms of Yuma myotis (top) and probable long-legged myotis on the Rio Americano Area on 10 September 2026.*

O4B-50

Table 1. *Species of wildlife I observed during 3.75 hours of survey on 10 February 2026, 2.25 hours of diurnal survey and 3.45 hours of nocturnal survey on 24 March 2026, during 3.8 hours of survey on 30 April 2026, 1.25 hours of diurnal survey and 3.25 hours of nocturnal survey on 4 June 2026, and 1 hour of evening survey and 3 hours of nocturnal survey on 10 September 2026.*

Common name	***Species name***	**Status[1]**
Sierran treefrog	*Pseudacris sierra*	
Western toad	*Anaxyrus boreas*	
American bullfrog	*Lithobates catesbeianus*	Non-native
Western fence lizard	*Sceloporus occidentalis*	
Northwestern pond turtle	*Actinemys marmorata*	FC, SSC
Red-eared slider	*Trachemys scripta elegans*	Non-native
Greater white-fronted goose	*Anser albifrons*	
Cackling goose (Aleutian)	*Branta hutchinsii leucopareia*	WL
Canada goose	*Branta canadensis*	
Mute swan	*Cygnus olor*	Non-native
Wood duck	*Aix sponsa*	
Gadwall	*Mareca strepera*	
Mallard	*Anas platyrhynchos*	
Ring-necked duck	*Aythya collaris*	
Bufflehead	*Bucephala albeola*	
Common goldeneye	*Bucephala clangula*	
Common merganser	*Mergus merganser*	
California quail	*Callipepla californica*	
Wild turkey	*Meleagris gallopavo*	
Western grebe	*Aechmophorus occidentalis*	BCC
Pied-billed grebe	*Podilymbus podiceps*	
Rock pigeon	*Columba livia*	Non-native
Mourning dove	*Zenaida macroura*	
Lesser nighthawk	*Chordeiles acutipennis*	
White-throated swift	*Aeronautes saxatalis*	
Anna's hummingbird	*Calypte anna*	
Common gallinule	*Gallinula galeata*	
American coot	*Fulica americana*	
Killdeer	*Charadrius vociferus*	
Spotted sandpiper	*Actitis macularius*	
Short-billed gull	*Larus brachyrhynchus*	
California gull	*Larus californicus*	BCC, WL
American herring gull	*Larus smithsonianus*	
Double-crested cormorant	*Nannopterum auritum*	WL
Great blue heron	*Ardea herodias*	
Great egret	*Ardea alba*	
Snowy egret	*Egretta thula*	
Green heron	*Butorides virescens*	
Turkey vulture	*Cathartes aura*	BOP
Osprey	*Pandion haliaetus*	WL, BOP

Common name	*Species name*	Status[1]
Sharp-shinned hawk	*Accipiter striatus*	WL, BOP
Cooper's hawk	*Accipiter cooperii*	WL, BOP
Red-shouldered hawk	*Buteo lineatus*	BOP
Red-tailed hawk	*Buteo jamaicensis*	BOP
American barn owl	*Tyto furcata*	BOP
Western screech-owl	*Megascops kennicotti*	BOP
Great horned owl	*Bubo virginianus*	BOP
Belted kingfisher	*Ceryle alcyon*	
Acorn woodpecker	*Melanerpes formicivorus*	
Downy woodpecker	*Dryobates pubescens*	
Nuttall's woodpecker	*Picoides nuttallii*	BCC
American kestrel	*Falco sparverius*	BOP
Northern flicker	*Colaptes auratus*	
Ash-throated flycatcher	*Myiarchus cinerascens*	
Western kingbird	*Tyrannus verticalis*	
Black phoebe	*Sayornis nigricans*	
Say's phoebe	*Sayornis saya*	
Western warbling vireo	*Vireo swainsoni*	
California scrub-jay	*Aphelocoma californica*	
Yellow-billed magpie	*Pica nuttalli*	BCC
American crow	*Corvus brachyrhynchos*	
Common raven	*Corvus corax*	
Oak titmouse	*Baeolophus inornatus*	BCC
Horned lark	*Eremophila alpestris*	
Tree swallow	*Tachycineta bicolor*	
Violet-green swallow	*Tachycineta thalassina*	
Northern rough-winged swallow	*Stelgidopteryx serripennis*	
Cliff swallow	*Petrochelidon pyrrhonota*	
Bushtit	*Psaltriparus minimus*	
Ruby-crowned kinglet	*Regulus calendula*	
Cedar waxwing	*Bombycilla cedrorum*	
Phainopepla	*Phainopepla nitens*	
White-breasted nuthatch	*Sitta carolinensis*	
Blue-gray gnatcatcher	*Polioptila caerulea*	
Bewick's wren	*Thryomanes bewickii*	
Northern house wren	*Troglodytes aedon*	
Marsh wren	*Cistothorus palustris*	
Northern mockingbird	*Mimus polyglottos*	
European starling	*Sturnus vulgaris*	Non-native
Western bluebird	*Sialia mexicana*	
American robin	*Turdus migratorius*	
House sparrow	*Passer domesticus*	Non-native
American pipit	*Anthus rubescens*	
House finch	*Haemorhous mexicanus*	

O4B-50
(Cont.)

Common name	*Species name*	Status[1]
Purple finch	*Haemorhous purpureus*	
Lesser goldfinch	*Spinus psaltria*	
Dark-eyed junco	*Junco hyemalis*	
Black-throated sparrow	*Amphispiza bilineata*	
White-crowned sparrow	*Zonotrichia leucophrys*	
Golden-crowned sparrow	*Zonotrichia atricapilla*	
Savannah sparrow	*Passerculus sandwichensis*	
Song sparrow	*Melospiza melodia*	
Lincoln's sparrow	*Melospiza lincolnii*	
California towhee	*Melozone crissalis*	
Spotted towhee	*Pipilo maculatus*	
Red-winged blackbird	*Agelaius phoeniceus*	
Brown-headed cowbird	*Molothrus ater*	
Orange-crowned warbler	*Oreothlypis celata*	
Common yellowthroat	*Geothlypis trichas*	
Northern yellow warbler	*Setophaga aestiva*	SSC2
Yellow-rumped warbler	*Setophaga coronata*	
Wilson's warbler	*Cardellina pusilla*	
Black-headed grosbeak	*Pheucticus melanocephalus*	
Little brown bat	*Myotis lucifugus*	WBWG:M
Yuma myotis	*Myotis yumanensis*	WBWG:LM
Long-legged myotis	*Myotis volans*	WBWG:H
California myotis	*Myotis californicus*	WBWG:L
Canyon bat	*Parastrellus hesperus*	WBWG:M
Big brown bat	*Eptesicus fuscus*	WBWG:L
Silver-haired bat	*Lasionycteris noctivagans*	WBWG:M
Western red bat	*Lasiurus blossevillii*	SSC, WBWG:H
Desert red bat	*Lasiurus frantzii*	SSC, WBWG:H
Mexican free-tailed bat	*Tadarida brasiliensis*	WBWG:L
Desert cottontail	*Sylvilagus audubonii*	
Brush rabbit	*Sylvilagus bachmani*	Sighting uncertain
Eastern fox squirrel	*Sciurus niger*	Non-native
Eastern gray squirrel	*Sciurus carolinensis*	Non-native
California ground squirrel	*Otospermophilus beecheyi*	
Western gray squirrel	*Sciurus griseus*	
Bobcat	*Lynx rufus*	
Coyote	*Canis latrans*	
Fox	*Vulpes or Urocyon*	
Mule deer	*Odocoileus hemionus*	
American beaver	*Castor canadensis*	
California vole	*Microtus californicus*	
Broad-footed mole	*Scapanus latimanus*	
Botta's pocket gopher	*Thomomys bottae*	

O4B-50
(Cont.)

[1] Listed on CDFW's Special Animals List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406) as FC = federal candidate for listing; CFP = California Fully Protected (California Fish and Game Code 3511); SSC_i = California Species of Special Concern with i = priorities 1, 2 and 3; WL = CDFW's Taxa to Watch List; WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H); BCC = U.S. Fish and Wildlife Service's Bird of Conservation Concern (https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf); and BOP = protected by Birds of Prey (California Fish and Game Code 3503.5, see https://wildlife.ca.gov/Conservation/Birds/Raptors).

O4B-50 (Cont.)

Table 2. *Additional species of vertebrate wildlife that I observed in over 40 field surveys on a site one mile north of the project area, 2020 through 2023.*

O4B-51

Common name	***Species name***	**Status[1]**
Gilbert's skink	*Eumeces gilberti*	
Snow goose	*Anser caerulescens*	
Cinnamon teal	*Spatula cyanoptera*	
Band-tailed pigeon	*Patagioenas fasciata*	
Black-chinned hummingbird	*Archilochus alexandri*	
Rufous hummingbird	*Selasphorus rufus*	BCC
Allen's hummingbird	*Selasphorus sasin*	BCC
Greater yellowlegs	*Tringa melanoleuca*	
Ring-billed gull	*Larus delawarensis*	
Caspian tern	*Hydroprogne caspia*	
Forster's tern	*Sterna forsteri*	
American white pelican	*Pelecanus erythrorhynchos*	SSC1, BCC
Cattle egret	*Bubulcus ibis*	
White-tailed kite	*Elanus leucurus*	CFP, BOP
Bald eagle	*Haliaeetus leucocephalus*	BGEPA, CE, BOP
Swainson's hawk	*Buteo swainsoni*	CT, BOP
Red-breasted sapsucker	*Sphyrapicus ruber*	
American kestrel	*Falco sparverius*	BOP
Peregrine falcon	*Falco peregrinus*	BOP
Rose-ringed parakeet	*Psittacula krameri*	Non-native
Western flycatcher	*Empidonax difficilis*	
Willow flycatcher	*Empidonax traillii*	CE
Dusky flycatcher	*Empidonax oberholseri*	
Hutton's vireo	*Vireo huttoni*	
Loggerhead shrike	*Lanius ludovicianus*	SSC2
Barn swallow	*Hirundo rustica*	
Wrentit	*Chamaea fasciata*	BCC
Red-breasted nuthatch	*Sitta canadensis*	
Hermit thrush	*Catharus guttatus*	
Pine siskin	*Spinus pinus*	
Lawrence's goldfinch	*Spinus lawrencei*	BCC
American goldfinch	*Spinus tristis*	
Chipping sparrow	*Spizella passerina*	
Fox sparrow	*Passerella iliaca*	

Common name	*Species name*	Status[1]
Yellow-headed blackbird	*X. xanthocephalus*	SSC3
Western meadowlark	*Sturnella neglecta*	
Hooded oriole	*Icterus cucullatus*	
Bullock's oriole	*Icterus bullockii*	BCC
Tricolored blackbird	*Agelaius tricolor*	CT, BCC, SSC1
Brewer's blackbird	*Euphagus cyanocephalus*	
MacGillivray's warbler	*Geothlypis tolmiei*	
Black-throated gray warbler	*Setophaga nigrescens*	
Townsend's warbler	*Setophaga townsendi*	
Western tanager	*Piranga ludoviciana*	
Lazuli bunting	*Passerina amoena*	
Virginia opossum	*Didelphis virginiana*	Non-native
Western mastiff bat	*Eumops perotis [californicus]*	SSC, WBWG:H
Mountain lion	*Puma concolor*	CCT
Gray fox	*Urocyon cinereoargenteus*	
Striped skunk	*Mephitis mephitis*	
River otter	*Lontra canadensis*	

O4B-51 (Cont.)

[1] Listed on CDFW's Special Animals List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406) as FC = federal candidate for listing; CFP = California Fully Protected (California Fish and Game Code 3511); SSC_i = California Species of Special Concern with i = priorities 1, 2 and 3; WL = CDFW's Taxa to Watch List; WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H); BCC = U.S. Fish and Wildlife Service's Bird of Conservation Concern (https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf); and BOP = protected by Birds of Prey (California Fish and Game Code 3503.5, see https://wildlife.ca.gov/Conservation/Birds/Raptors).

COMPARATIVE ANALYSIS OF RECONNAISSANCE SURVEY DATA

O4B-52

During my two morning surveys on the project area, I detected 72 and 71 species of vertebrate wildlife, respectively. During my three evening surveys on the project area, I detected 52, 42, and 31 species of vertebrate wildlife, respectively. These were large numbers considering the brevity of each of my survey efforts. All the species in Table 1, and likely all the species in Table 2, would face habitat loss caused by noise and light impacts from the development of the stadium. However, the species of wildlife I detected were not the only species present during my surveys, as there are always species that are not detected. To demonstrate this, I fit nonlinear regression models to my cumulative numbers of vertebrate species detected with time into the daylight portion of each of my surveys to predict the numbers of species I would have detected with a longer survey or perhaps with additional biologists to assist. The type of model I used is a logistic growth model. The models that best fit my morning survey data predict 95 and 110 species of vertebrate wildlife were available for detection during my morning surveys, or 33 to 39 species more than I detected (Figure 1). The models that best fit my evening survey data predict 95, 59 and 88 species of vertebrate wildlife were available for detection during my evening surveys, or 43, 17, and 57 species more than I detected

O4B-53

(Figure 2). In all surveys, my rates of species detections far exceeded the upper bound of my 95% confidence interval based on many morning and evening surveys in the region, indicating the project area possesses an unusually high species richness. The same patterns were true of bats in the two surveys comparable to my estimated 95% confidence interval from many other all-night acoustic bat surveys in summer/fall (Figure 3).

O4B-53 (Cont.)

Unknown are the identities of the species I missed, but those species available for detection during my site visits composed only fractions of the species that would occur on the project area over the period of a year or longer. This is because many species are seasonal in their occurrence, some require more survey effort because they are highly cryptic, and the members of other species would visit the site only periodically while patrolling large home ranges. A survey on only two or three days cannot possibly detect all the species of the local wildlife community. Probably all the species in Table 2 as well as many others also occur on the project area.

O4B-54

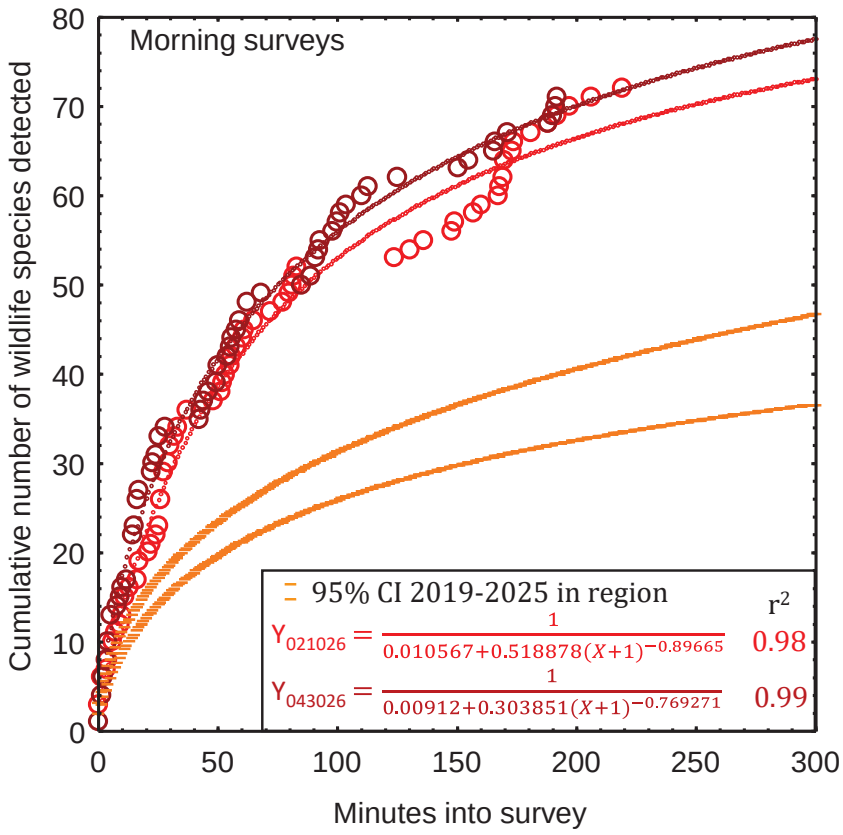
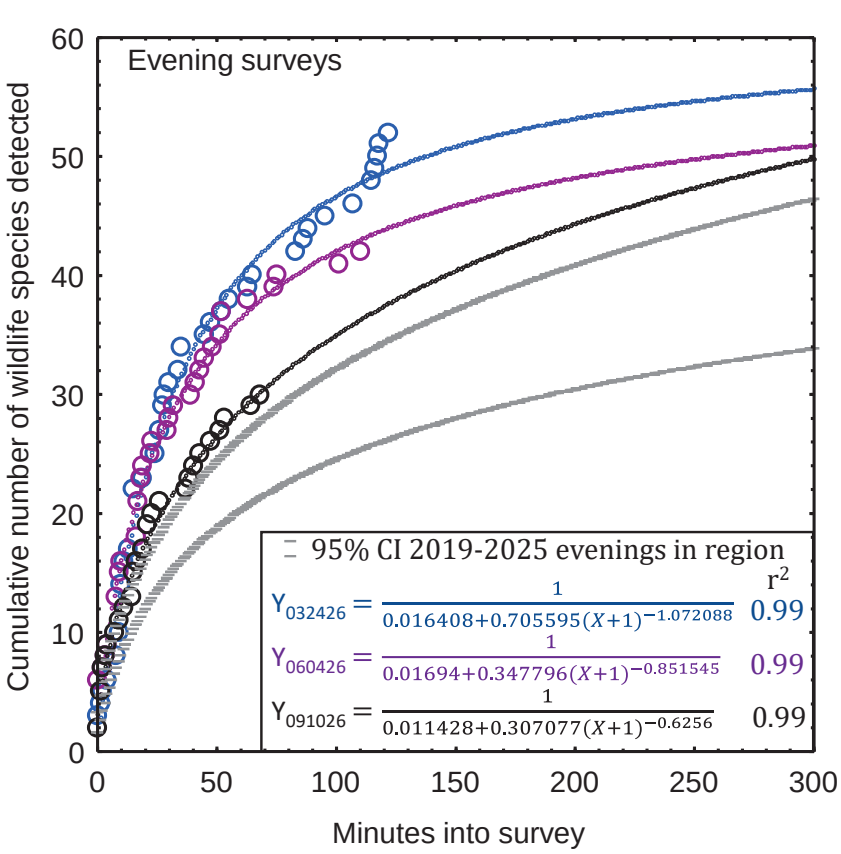


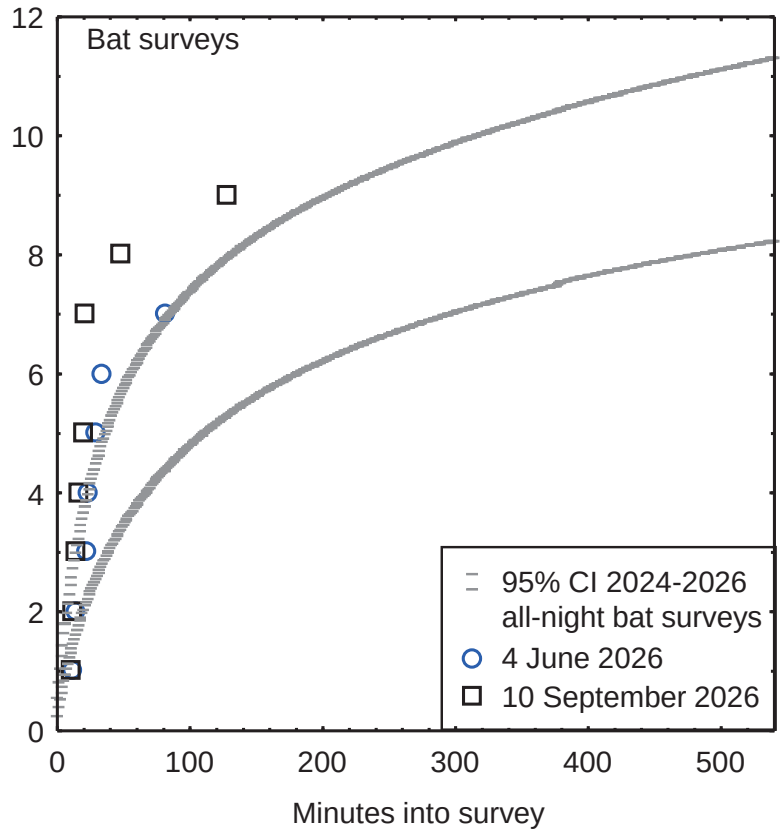
Figure 1. *Actual and predicted relationships between the numbers of vertebrate wildlife species detected and the elapsed survey time based on my visual-scan survey on the mornings of 10 February (red) and 30 April 2026 (maroon) compared to the 95% confidence interval (orange) estimated from many other morning surveys throughout the Sacramento-San Joaquin Valley region since 2019.*

O4B-55



O4B-56

Figure 2. *Actual and predicted relationships between the numbers of vertebrate wildlife species detected and the elapsed survey time based on my visual-scan survey on the evenings of 24 March (blue), 4 June (purple), and 10 September 2026 (black) compared to the 95% confidence interval (gray) estimated from many other evening surveys throughout the Sacramento-San Joaquin Valley region since 2019.*



O4B-57

Figure 3. *Actual relationships between the numbers of bat species detected and the elapsed survey time based on my acoustic bat surveys on the nights of 4 June (blue circles), and 10 September 2026 (black squares) compared to the 95% confidence interval (gray) estimated from many other all-night summer/fall surveys throughout California since 2024. Data from the night of 24 March 2026 are not shown because the date was in spring, and therefore not comparable to the 95% CI.*

One should expect the same increase in the number of bat species known to the site after continued surveys for nocturnally active wildlife. My three brief nocturnal surveys detected 10 species of bats, 7 of which I regard as special-status species. Based on 40 all-night bat surveys throughout the summer and fall months over the past two years, my employee, Noriko Smallwood[1] and I detected an average 7.5 bat species in our first 3.23 hours of survey (the average time of my three bat surveys on the project area), and 10 bat species after 10 hours. Adjusting for this difference, my average of 7 bat species per survey on the project area divided by 0.75 predicts an average 9.33 bat species per nightlong survey. Based on our monitoring of bats in both our backyards and at a third monitoring site in a nature reserve, Noriko and I observed a 2.125-fold increase in the average cumulative number of bat species detected per night with additional surveys throughout one year (Figure 5). This same magnitude of increase would be expected at the project area if the area was to be similarly monitored. Analytically bridging to our bat monitoring data, I predict the project area is habitat for at least 20 species of bats (i.e., 9.33 × 2.125), the identities of half of which remain unknown. (In this exercise, I am not reporting standard errors.) In other words, monitored over the long term, the project area and its vicinity would be found to support just about every bat species known to the region.

O4B-58

I also note that bat activity was high during my surveys. I detected 279 passes during my first survey in March, 108 passes during my second survey in June, and 139 passes during by third survey in September. Thus, I recorded 81, 33, and 46 passes per hour on my respective survey dates. The lowest passage rate was recorded next to the Rio Americano Lagoon, whereas the highest was on the upper terrace 284 feet (86 m) from the DEIR's project boundary. I have not tabulated the passage rates in all my bat surveys throughout California, but of the 41 surveys of which I did, the average was 26.8 per hour. All three of my surveys on Rio Americano Area exceeded my average bat passage rate.

O4B-59

[1] Noriko Smallwood is a wildlife biologist with a Master of Science Degree from California State University Los Angeles. She is employed by me, and she collaborates with me in wildlife research.

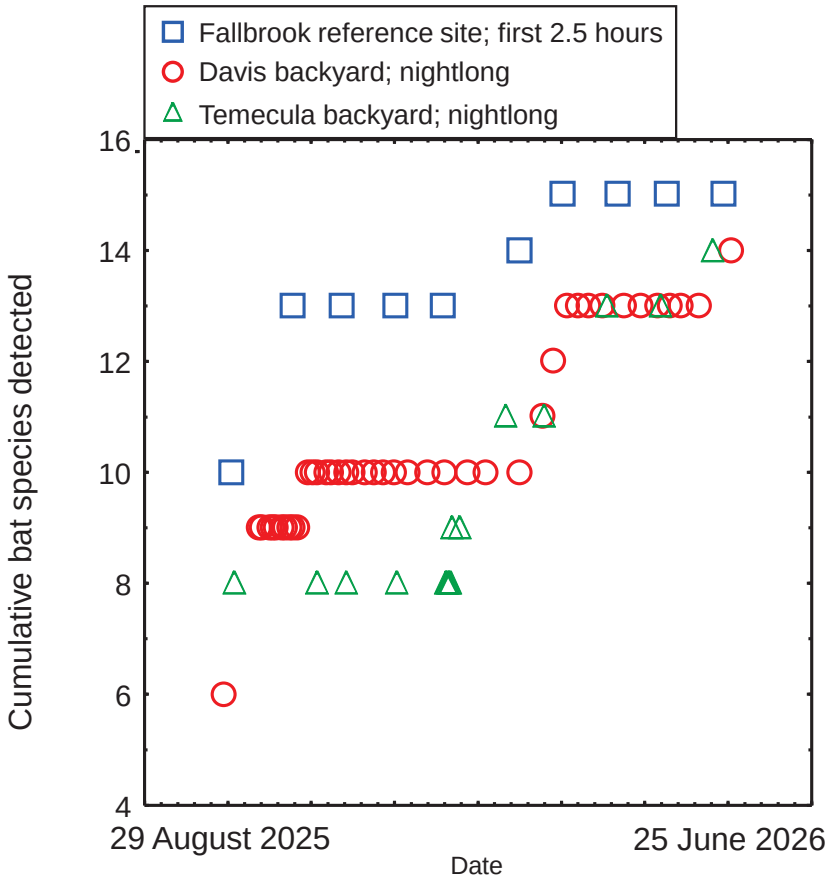


Figure 5. *The cumulative numbers of bat species detected at each of 3 sites increased with more surveys from late August 2025 through 25 June 2026. One site is a reference site with high ecological integrity at Fallbrook, California. The other two sites were in backyards in Davis and Temecula, California.*

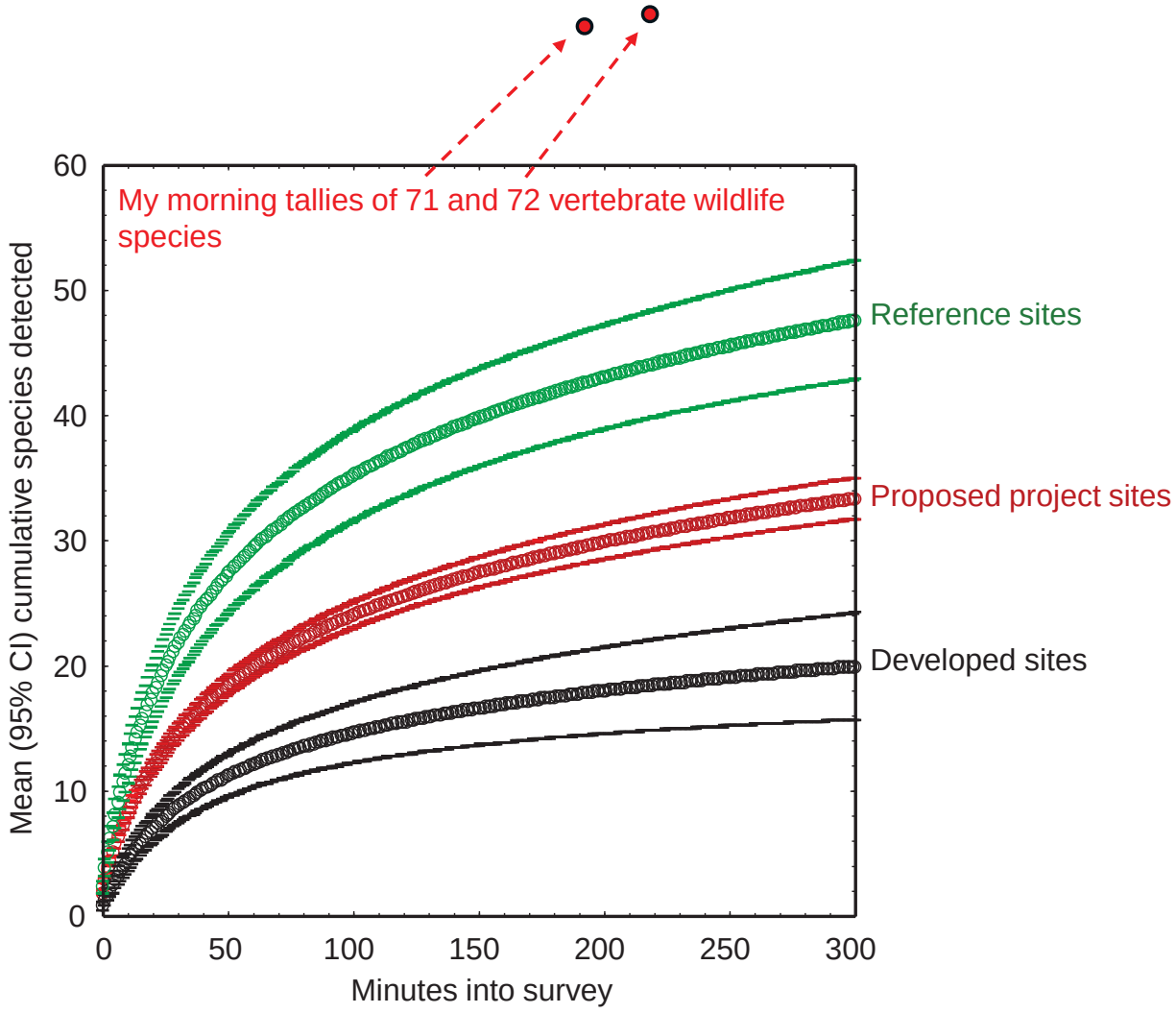
O4B-60

My examination of my survey data exemplifies the comparative analysis needed to interpret the data. Other methods are available than those I use, but the important points are to (1) disclose levels of uncertainty in conclusions drawn from the data, and (2) contextualize the findings relative to the survey method and survey effort. The most effective way to accomplish these analytical needs is through comparative analyses of how survey methods and effort-levels affect survey outcomes, and what was found elsewhere upon implementing similar survey methods and effort-levels. Moreover, the surveys performed should be relevant to achieving CEQA's principal objectives (see below).

O4B-61

What my examination of my survey data reveals is that adjacent to Rio Americano High School, the Rio Americano Area supports a spectacular wildlife community. It is one of the richest assemblies of t wildlife species in California. Another way of examining my findings is to compare them to what Noriko Smallwood and I have found not only among hundreds of project sites, but also among the many reference sites we have selected to survey for their more pristine conditions, such as in Nature Reserves and Audubon Important Bird Areas. This type of comparison reveals that relative to the survey effort, the number of vertebrate wildlife species I detected at the project area far exceeds the upper bound of my estimated 95% confidence interval based on the many surveys that Noriko and I completed at more pristine reference sites (Figure 6). My findings at the project area are off the chart.

O4B-62



O4B-63

Figure 6. *The mean (95% confidence interval) number of vertebrate wildlife species detected by me and Noriko at hundreds of project sites (red), developed sites (black), and more pristine sites we survey as reference sites (green).*

MISCHARACTERIZATION OF EXISTING ENVIRONMENTAL SETTING

O4B-64

CEQA's principal objectives should guide the design and conduct of CEQA review. Four of CEQA's primary objectives are to (1) accurately characterize the existing environmental setting, (2) disclose potential project impacts to the public and decision-makers, (3) foster public participation with decision-making over proposed projects, and (4) identify issues and feasible alternative mitigation measures to minimize environmental impacts. The first objective is essential to the other three, because an accurate understanding of the existing environmental setting is needed to predict impacts, provide the public with the means to meaningfully participate with issues of importance, and effectively strategize mitigation and project alternatives (Figure 7). For biological resources, essential information includes the species composition of the plant and wildlife communities, key ecological interactions, identification of ecological keystone species, determining the presence of special-status species or their habitats,

and identifying risk factors that could result in significant direct, indirect and cumulative impacts should the project go forward.

O4B-64 (Cont.)

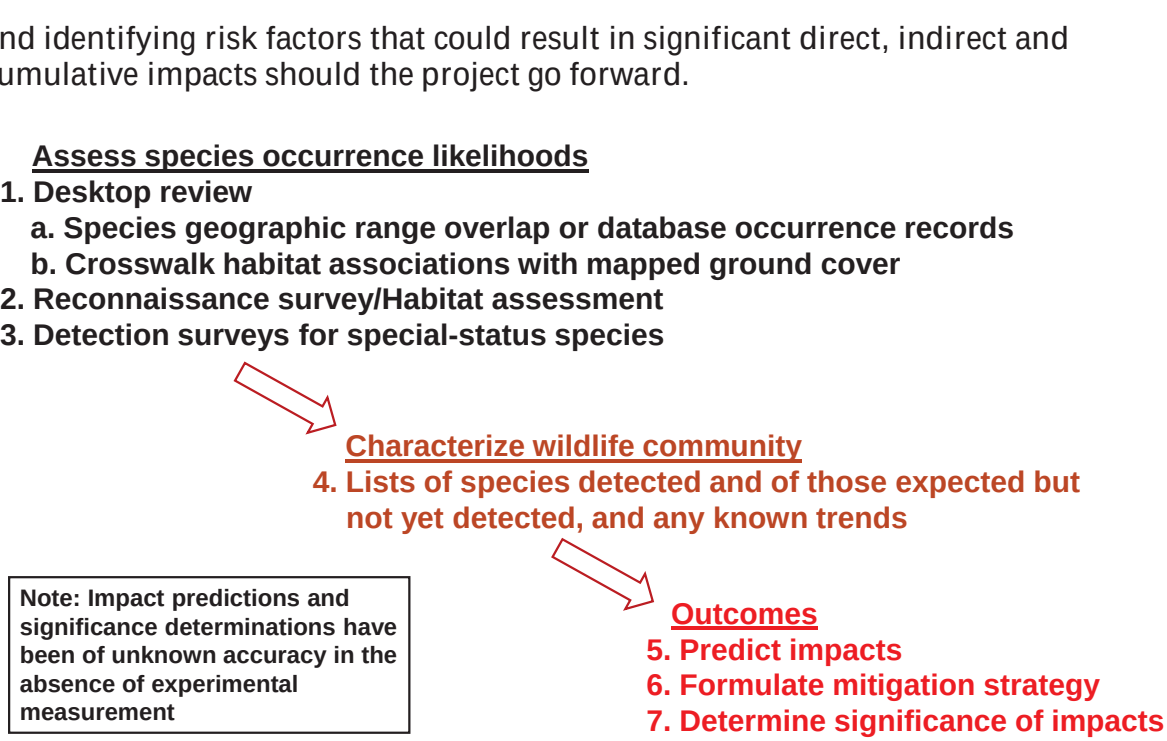


Figure 7. *General flow of information from its gathering through characterizing the existing environment to predicting impacts and their significance*.

O4B-65

The public and its representative decision-makers need to know which species are susceptible to harm potentially caused by the project and its associated activities, and which are known to be vulnerable to harm once exposed to the environmental changes brought by the project. For these reasons, field studies are needed to identify as many of the species that occur on the project area as reasonably feasible, and to otherwise examine the environmental conditions for their likelihood to support species that are not detected, otherwise known as "habitat assessment." A review of species occurrence records – also known as "desktop review" – is needed to identify the other species that potentially occur on the site – a process that is also referred to as "habitat assessment." Because habitat assessments that are based on either or both field study and desktop review are prone to uncertainty, emphasis needs to be directed to adequate field study to reduce the pool of species subjected to habitat assessment, thereby weighing the review more towards certainty. Appropriately weighted reviews are less susceptible to speculation over species occurrence likelihoods. For this reason, protocol-level detection surveys have been formulated for numerous special-status species of plants and wildlife, and otherwise best scientific practices are needed to provide a reasonable likelihood of detection of species that truly occur on the project area. The negative findings of a properly conducted detection survey are the only findings that can support a determination of species absence, and negative findings are valid only over the period of the surveys.

Even among reviews supported by the best field studies, there is always uncertainty over some of the determinations of species occurrences. The uncertainties of habitat assessments need to be managed to achieve CEQA's principal objectives. This means

that the methodological details of both the field studies and desktop review need to be carefully and thoroughly reported, and it means that results need to be reported in context of their uncertainties. For example, the reporting of having detected 10 species in a reconnaissance survey is nearly meaningless without also reporting the numbers of species found in surveys of similar methods and effort levels, and the reporting of the failure to detect a given species is nearly entirely meaningless without also reporting the likelihood that species would be detected given the survey methods and effort level. The same is true of desktop review; that is, there should be some means of validating habitat assessments based on the thousands of habitat assessments that have already been conducted in support of CEQA reviews. If industry standards in environmental review are to be credible, then they must include the use of the comparative method.

O4B-65 (Cont.)

In the case of this project, the DEIR muddles the characterization of the existing environmental setting. It fails to explain how or why the steps taken to characterize the ecological community relate to CEQA's principal objectives. The DEIR speculates which species of wildlife should occur on the athletic fields, and it speculates that the wildlife community of the Rio Americano Area is separate from that of Rio Americano High School's campus, presumably separated by a levee. For example, it states (p. 4.2-6) that individual yellow-billed cuckoos "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," thereby implying that whatever happens on the DEIR's defined project site would have no bearing on yellow-billed cuckoos on the Parkway. The DEIR reports nothing about the uncertainties of the findings from field surveys and desktop review, which vastly diminishes the accuracy of the characterization of the existing environmental setting. The only certainty applies to the presence of biological resources that were detected on the site, but the presence of many other resources remains uncertain to various degrees depending on survey methods, survey effort, and the environmental setting.

O4B-66

Another mischaracterization is the DEIR's labeling of wildlife species lacking special status as "common wildlife." However, many wildlife species that lack special status are rare, either because they are naturally rare or because their numbers have declined or their range has contracted while their status has remained unchanged. The "common wildlife" characterization is misleading, as is the DEIR's insinuation that special-status species of wildlife would not be found in an environment such as the High School's athletic fields. In fact, Fettke (2026) reports having observed a flock of 60 yellow-billed magpies on the athletic fields, consistent with my observations. The yellow-billed magpie is a US Fish and Wildlife Service Bird of Conservation Concern.

O4B-67

A potential mischaracterization exists in the DEIR's repeated claim (DEIR pp. 3-10, 4.2-15, 4.2-25; Exhibit 3-3, p. 3-5) that no trees would be removed by the project. Exhibit 3-3 of the DEIR depicts the new home team bleachers where trees currently exist. It is hard to imagine how the project would avoid removing the trees where the bleachers are planned, but even if it does avoid removing the trees, the bleachers would encroach far onto the dripline.

O4B-68

Misleading is the DEIR's repeat characterization of the trees along the south side of the existing track/football field as "tall," but without reporting the heights of these trees. Tall trees might be expected to block noise and light from the stadium from reaching the Rio Americano Area, which is an expectation promoted by the DEIR.[2] Fettke (2026) reportedly field-fit her bat habitat assessment based on this claim that the trees would prevent much of the project's light and noise from penetrating the Rio Americano Area. Based on my measurements, which are simple projects of the height of the cyclone fence to the tops of tree canopies,, the heights of the oaks range 24 to 36 feet, and the conifers in the vicinity of the planned press box range 36 to 56 feet. The tallest trees, which are eucalyptus, occur along about 175 feet of the western end of the row of trees at issue, and they grow up to about 75 feet in height. The 30-foot height of the home-team bleachers would exceed the heights of about half the trees, and I believe the 80-foot-tall high-mast light standards would exceed the heights of all the trees. Contrary to the DEIR's characterization, this row of trees would probably fail to block enough of the project's noise and light from substantial penetration of the Parkway, and hence exposing wildlife to potential impacts. O4B-69

Environmental Setting informed by Field Surveys

The only biological surveys completed in support of the DEIR consisted of a habitat assessment for bats on 25 July 2025, followed by bat emergence surveys on 30 and 31 July and 28 and 29 August 2025 (Fettke 2026). The DEIR cites no other survey in support of its characterization of the wildlife community as part of the existing environmental setting. As far as I can determine, no other biologists visited the project area to survey for wildlife. Therefore, the DEIR's characterization of the wildlife community is based on Fettke's observations she made during her bat survey and otherwise it is speculative. Fettke (2026) reports having seen two species of birds and California toad, portraying a very different wildlife community than I observed. O4B-70

Fettke's habitat assessment consisted of a search for guano under candidate roost sites within 500 feet of the DEIR's defined project site. According to Fettke (2026:2), "The actual survey area was field-fit based on the likelihood of potential roost habitat and the amount of light and noise buffering between the stadium and the potential roost habitat." That her survey extended 500 feet into the American River Area is evidence that Fettke or AECOM or the School District believed the effects of light and noise from the project would potentially extend 500 feet wherever the sourced light and noise remained unobstructed by trees. I concur with the 500-foot search area, but the field-fitting performed by Fettke was implemented without the benefit of observing actual light and noise from the project; in other words, Fettke speculated over where light and O4B-71

[2] For example, Fettke (2026) writes, "Several trees along the American River Parkway had small cavities and small pieces of sloughing bark with appropriate protection and solar exposure that would provide potential roosting habitat to small numbers of bats. However, these potential roost features are screened from proposed lighting and noise disturbance at the high school by a row of large trees (mostly eucalyptus species) located along the southern fenceline between the school and the American River Parkway. The screening provided by this row of trees would reduce potential disturbance in the American River Parkway to a degree that it would not be expected to cause roost abandonment if any of the trees in the American River Parkway are used for roosting. Therefore, no further survey efforts were necessary for trees in the American River Parkway."

noise might penetrate up to 500 feet into the Parkway. Fettke (2026) fails to report a map of the area assessed for bat habitat, nor does it report the number of Parkway trees searched for guano. In only one afternoon during which school buildings and the trees along the north side of the levee were searched, it is difficult to believe that Fettke could have effectively searched more than a few Parkway trees.

O4B-71 (Cont.)

Fettke's emergence surveys consisted of twilight surveys for bats, and use of acoustic detection. The twilight surveys consisted of viewing the airspace next to trees in the direction of the set-sun to silhouette bats against the background light. I performed similar surveys for burrowing owls 20 years ago, but I later found it more effective to use a thermal-imaging camera. Fettke reports that a thermal-imaging camera would have been impractical because its field of view was insufficiently wide, but this insufficiency must have resulted from the camera Fettke had available. I resolved this issue by using a thermal-imaging camera to which I could fit a wide-angle lens. Only a month prior to these comments, I used a FLIR T640 thermal-imaging camera fit with a wide-angle lens to view bats emerging from my backyard redwood tree at dusk.

Fettke (2026) reports using an Echometer Pro acoustic bat detector in her emergence surveys. This bat detector attaches to a smart phone. Such detectors are known to mistake car brakes for bat calls, and once I had a user report to me the detection of two endangered bat species in Los Angeles whose small geographic ranges occur in Florida – a distance separation too great to be credible. The bats Fettke reports having detected are at least consistent with the species that occur in the area, but unreported is the volume of airspace surveyed by the detector. I suggest that AECOM acquire a suitable acoustic bat detector along with the call reference library and vetted software needed for accurate bat species identification based on sonograms.

The DEIR fails to report any comparison of what Fettke found on the site relative to what Fettke or others have found elsewhere. Fettke's results lack context, which leaves Fettke's interpretation of some of her findings as speculative. For example, Fettke (2026) reports, "only minor foraging activity was detected during surveys, and abundant, generally superior foraging habitat exists in the American River Parkway just to the south of Raider Stadium." However, without any comparison to what is found of acoustic surveys in other environments, Fettke lacks any basis for characterizing foraging on the site as "minor." And she has no basis for reporting that foraging is greater on the Parkway, as she did not conduct an acoustic detection survey there.

O4B-72

Fettke speculates, "…on July 30, the first bat was detected acoustically at 8:44 PM (i.e., not immediately after sunset) and identified as a Mexican free-tailed bat (*tadarida brasiliensis*). This was followed by a continuous and regular pattern of detection of other Mexican free-tailed bats for eight minutes, none of which were observed visually. This data would be consistent with an emergence of this bat species from a roost in the vicinity (outside the project disturbance area) flying towards a foraging location at an elevation too high for visibility." However, without relating these observations to others, Fettke lacks any basis for concluding that the additional Mexican free-tailed bat detections were of "other" bats rather than the same bat, and she also lacks any basis for concluding the pattern of detections is indicative of bats emerging from a roost. In fact, I

O4B-73

have seen the same bat make repeat passes on approach to a target. I have seen this by eye and by use of a thermal-imaging camera. Sometimes a bat will investigate the human observer conducing the survey, but more often a bat will make repeat passes into a cloud of flying insects. Such clouds of prey items often form over tree canopies as dusk transitions into night. In summary, bats detected by Fettke were probably foraging, because most bat detection software identifies species based on foraging calls, but otherwise Fettke cannot have known where these bats came from or what else they might be doing in the project area.

O4B-73 (Cont.)

Fettke (2026) reports her start and end times of her emergence surveys, which I assume also represented her use of acoustic detection. Her start times were early for acoustic detection, having begun about 15 minutes before sunset. Bats usually emerge after sunset, consistent with Fettke's quoted statement above. For example, in my Davis survey on the same night as Fettke's 29 August 2025 survey, my first bat detection was at 20:02 hours, or 19 minutes after sunset. The effective duration of Fettke's acoustic detection surveys was only about 40 minutes per survey, which is not enough time to accumulate more than a few detections. Fettke (2026) reports having observed 5 bats, which she identified as members of the three species her detector identified -- Yuma myotis, canyon bat, and Mexican free-tailed bat. However, it is unlikely that she could have directly tied these five bats to her acoustic detections unless she saw each one's approach coincident with her detector's identification. Anyhow, without knowing the performance parameters of her detector, I cannot translate her findings into a comparable metric. All I can say is that I found 10 species of bats only a short distance from where Fettke performed her surveys, and I could see some of the bats I detected flying over and across to the north side of the levee. I can also say that about twice as many bat species occur in the project area as compared to the number I detected.

O4B-74

Based on a very limited survey, Fettke (2026) concludes, "the proposed improvements are expected to result in minimal increases in disturbance and resulting potential loss of foraging habitat. In addition, only minor foraging activity was detected during surveys, and abundant, generally superior foraging habitat exists in the American River Parkway just to the south of Raider Stadium. Therefore, the potential loss of the relatively small, limited quality foraging habitat provided by the existing Raider Stadium during the evening hours would result in a less-than-significant impact, and no further actions are recommended for foraging bats." However, who expects such minimal increases in disturbance is left vague, nor is there any explanation of how the additional seating for another 2, 287 people and the addition of stadium lights atop 80-foot towers would impart only minimal disturbances on wildlife. Fettke's characterization of only minor foraging activity by bats is reported without comparable context. Fettke can only speculate over the comparable foraging activity and abundance of bats on the American River Parkway, and she neglects to consider that these bats are likely the same bats that forage on the athletic fields. In summary, Fettke's conclusion is speculative. This type of speculative conclusion to predict that potential project impacts would be less than significant is prohibited by CEQA (see CEQA Guidelines section 15145).

O4B-75

Environmental Setting informed by Desktop Review

O4B-76

To establish its pool of special-status species for assessing occurrence likelihoods, otherwise referred to as habitat assessments, AECOM queried the California Natural Diversity Data Base (CNDDB) for documented occurrences of special-status species within five miles of the project site. However, by relying on its CNDDB query, AECOM screens out many special-status species from further consideration in the characterization of the wildlife community as part of the existing environmental setting. The species screened out of further analysis are effectively determined to be absent from the project site. The CNDDB is not designed to support absence determinations or to screen out species from characterization of a site's wildlife community. As noted by the CNDDB, "*The CNDDB is a positive sighting database. It does not predict where something may be found. We map occurrences only where we have documentation that the species was found at the site. There are many areas of the state where no surveys have been conducted and therefore there is nothing on the map. That does not mean that there are no special status species present*." AECOM and hence the DEIR misuse the CNDDB.

The CNDDB relies entirely on volunteer reporting from biologists who were allowed access to whatever properties they report from. Many properties have never been surveyed by biologists. Many properties have been surveyed, but the survey outcomes never reported to the CNDDB. Many properties have been surveyed multiple times, but not all survey outcomes reported to the CNDDB. Furthermore, the CNDDB is interested only in the findings of special-status species, which means that species more recently assigned special status will have been reported many fewer times to the CNDDB than were species assigned special status since the inception of the CNDDB. The lack of many CNDDB records for species recently assigned special status had nothing to do with whether the species' geographic ranges overlapped the project site, but rather more to do with the brief time for records to have accumulated since the species were assigned special status. And because negative findings are not reported to the CNDDB, the CNDDB cannot provide the basis for estimating occurrence likelihoods, either.

O4B-77

In my assessment based on a review of eBird and iNaturalist records and a site visit, 116 special-status species of wildlife are known to occur near enough to the site to warrant analysis of occurrence potential (Table 3). Not all these species should be expected to occur at the project area, but each of them should be given a closer look to determine occurrence likelihoods and whether additional surveys are needed, or implementation of detection surveys, or whether it would be reasonable to assume presence. Of these 116 special-status species, 39 (34%) have been recorded on the project area, and another 35 (30%) species have been documented within 1.5 miles of the site (Very close), another 5 (4%) between 1.5 and 4 miles (Nearby), and another 30 (26%) between 4 and 30 miles (In region). More than two-thirds (68%) of the species in Table 3 have been reportedly documented within 4 miles of the project area. The site therefore supports at least 39 special-status species of wildlife, and it carries the potential for supporting many more special-status species of wildlife based on the close proximities of recorded occurrences. Evidence certainly suggests that habitat assessments are needed for these species.

The DEIR considers the occurrence likelihoods of only 15 (13%) of the special-status species listed in Table 3, which means that 101 (87%) of the special-status species in Table 3 were screened out of its analysis in the first step of its desktop review. As a reminder, these species were omitted from the analysis because they lacked CNDDB records within 5 miles of the project site, but again, this was a misuse of the CNDDB. Anyhow, if the authors of the DEIR regard all 101 of the species omitted from its analysis as absent, then the DEIR is deeply flawed because 35 of them were detected on the project area inclusive of the Rio Americano Area within 500 feet of the existing athletic fields, 33 have been documented within 1.5 miles, and another 4 have been documented between 1.5 and 4 miles away. This is an unacceptable error rate, and some of the errors are substantial. O4B-78

Of the 15 special-status species that the DEIR assesses for occurrence likelihood, 10 are determined to have no chance of occurrence or to be unlikely, and the other 5 are determined to have potential to occur. However, of the 10 species determined to be unlikely or to have no chance of occurrence, all but one has been documented within 1.5 miles of the project area. The DEIR's determinations of occurrence likelihood are inconsistent with the exercise of the Precautionary Principle in risk analysis involving rare or precious resources (National Research Council 1986), and are therefore not trustworthy. O4B-79

Mischaracterization of the Wildlife Community

The DEIR reports on a bat survey and a desktop review having been completed, but the bat survey results are interpreted without sufficient context to survey effort nor to survey results from elsewhere, and its findings are limited by the survey methods. Its desktop review starts with an inappropriately small pool of special-status species, and then the DEIR too often resorts to speculation in its analyses of occurrence likelihoods, having dismissed consideration of the wildlife community that includes that of the Rio Americano Area. Speculated habitat assessments are highly uncertain, which is inappropriate for determining the absences or low likelihoods of precious or rare resources such as special-status species (National Research Council 1986). The true wildlife community remains to be described with sufficient accuracy. Without a more accurate characterization of the wildlife community, the basis is inadequate for predicting impacts and formulating appropriate mitigation strategies. O4B-80

The most problematic mischaracterization is that the wildlife community potentially exposed to the project's effects consists only of those species that occur on the High School campus. Fettke's (2026) study design reveals that at least one of the consulting biologists considered the wildlife community of the Parkway could be affected, but Fettke argued otherwise in the Discussion section despite having insufficient supporting data. With so many species, including so many special-status species, so close to new sources of noise, light and human intrusion, the Parkway's wildlife community needs to be considered as part of the project area. O4B-81

Table 3. *Occurrence likelihoods of special-status bird species at or near the proposed project area, according to eBird/iNaturalist records (https://eBird.org, https://www.inaturalist.org) and on-site survey findings, where 'Very close' indicates within 1.5 miles of the site, "nearby" indicates within 1.5 and 4 miles, and "in region" indicates within 4 and 30 miles, and 'in range' means the species' geographic range overlaps the site. Entries in bold font identify species I detected during my site visits.*

Common name	*Species name*	Status[1]	Occurrence likelihood	
			DEIR	Records, Surveys
Conservancy fairy shrimp	*Branchinecta conservatio*	FE		In range
Vernal pool fairy shrimp	*Branchinecta lynchi*	FT		In region
Vernal pool tadpole shrimp	*Lepidurus packardi*	FE		In region
Valley elderberry longhorn beetle	*Desmocerus californicus dimorphus*	FT	Potential	In region
Monarch	*Danaus plexippus*	FC	Unlikely	Very close
Crotch's bumble bee	*Bombus crotchii*	CCE	Unlikely	Very close
Western bumble bee	*Bombus occidentalis*	CCE		In range
California tiger salamander	*Ambystoma californiense*	FT, CT, WL		In region
Western spadefoot	*Spea hammondii*	FC, SSC	None	In region
Foothill yellow-legged frog	*Rana boylii*	FE, CE		In region
Northwestern pond turtle	*Actinemys marmorata*	FC, SSC	Unlikely	Very close/**On site**
Coast horned lizard	*Phrynosoma blainvillii*	SSC		In region
Giant gartersnake	*Thamnophis gigas*	FT, CT		In region
Brant	*Branta bernicla*	SSC2		In region
Cackling goose (Aleutian)	*Branta hutchinsii leucopareia*	WL		Very close/**On site**
Redhead	*Aythya americana*	SSC2		Very close
Barrow's goldeneye	*Bucephala islandica*	SSC		On site
Western grebe	*Aechmophorus occidentalis*	BCC		Very close/**On site**
Clark's grebe	*Aechmophorus clarkii*	BCC		Very close
Western yellow-billed cuckoo	*Coccyzus americanus occidentalis*	FT, CE	Unlikely	Very close
Black swift	*Cypseloides niger*	SSC3, BCC		Very close
Vaux's swift	*Chaetura vauxi*	SSC2		Very close
Calliope hummingbird	*Selasphorus calliope*	BCC		Very close
Rufous hummingbird	*Selasphorus rufus*	BCC		Very close/**Very close**
Allen's hummingbird	*Selasphorus sasin*	BCC		In region/**Very close**
Lesser sandhill crane	*Antigone canadensis canadensis*	SSC3		Nearby

Common name	*Species name*	Status[1]	Occurrence likelihood	
			DEIR	Records, Surveys
Greater sandhill crane	*Antigone canadensis tabida*	CT, CFP		Nearby
Mountain plover	*Charadrius montanus*	SSC2, BCC		In region
Snowy plover	*Charadrius nivosus*	BCC		In region
Western snowy plover	*Charadrius nivosus nivosus*	FT, SSC		In region
Long-billed curlew	*Numenius americanus*	WL		Very close
Marbled godwit	*Limosa fedoa*	BCC		Very close
Pectoral sandpiper	*Calidris melanotos*	BCC		Very close
Short-billed dowitcher	*Limnodromus griseus*	BCC		Nearby
Lesser yellowlegs	*Tringa flavipes*	BCC		On site
Willet	*Tringa semipalmata*	BCC		Very close
Franklin's gull	*Leucophaeus pipixcan*	BCC		In region
Heermann's gull	*Larus heermanni*	BCC		In region
Western gull	*Larus occidentalis*	BCC		Very close
California gull	*Larus californicus*	BCC, WL		On site/**On site**
California least tern	*Sternula antillarum browni*	FE, CE, CFP		In region
Black tern	*Chlidonias niger*	SSC2, BCC		Very close
Common loon	*Gavia immer*	SSC		On site
Double-crested cormorant	*Nannopterum auritum*	WL		On site/**On site**
American white pelican	*Pelacanus erythrorhynchos*	SSC1		Very close/**Very close**
Least bittern	*Ixobrychus exilis*	SSC2		In region
White-faced ibis	*Plegadis chihi*	WL		Very close
Turkey vulture	*Cathartes aura*	BOP		On site/**On site**
Osprey	*Pandion haliaetus*	WL, BOP		On site/**On site**
White-tailed kite	*Elanus luecurus*	CFP, BOP	Potential	On site/**Very close**
Golden eagle	*Aquila chrysaetos*	BGEPA, CFP, BOP, WL	Unlikely	Very close
Northern harrier	*Circus cyaneus*	BCC, SSC3, BOP		On site
Sharp-shinned hawk	*Accipiter striatus*	WL, BOP		On site/**On site**
Cooper's hawk	*Accipiter cooperii*	WL, BOP		On site/**On site**
American goshawk	*Accipiter atricapillus*	SSC2, BOP		In region
Bald eagle	*Haliaeetus leucocephalus*	CE, BGEPA, BOP		On site/**Very close**

Common name	*Species name*	Status[1]	Occurrence likelihood	
			DEIR	Records, Surveys
Red-shouldered hawk	*Buteo lineatus*	BOP		On site/**On site**
Swainson's hawk	*Buteo swainsoni*	CT, BOP	Potential	On site/**Very close**
Red-tailed hawk	*Buteo jamaicensis*	BOP		On site/**On site**
Ferruginous hawk	*Buteo regalis*	WL, BOP		Very close
Rough-legged hawk	*Buteo lagopus*	BOP		Nearby
American barn owl	*Tyto furcata*	BOP		Very close/**On site**
Western screech-owl	*Megascops kennicottii*	BOP		Very close/**On site**
Great horned owl	*Bubo virginianus*	BOP		On site/**On site**
Burrowing owl	*Athene cunicularia*	BCC, SSC2, BOP, CCE	Unlikely	Nearby
Long-eared owl	*Asio otus*	BCC, SSC3, BOP		In region
Short-eared owl	*Asia flammeus*	BCC, SSC3, BOP		Very close
Northern saw-whet owl	*Aegolius acadicus*	BOP		In region
Northern pygmy-owl	*Glaucidium gnoma*	BOP		Very close
Lewis's woodpecker	*Melanerpes lewis*	BCC		Very close
Nuttall's woodpecker	*Picoides nuttallii*	BCC		On site/**On site**
American kestrel	*Falco sparverius*	BOP		On site/**On site**
Merlin	*Falco columbarius*	WL, BOP		On site
Peregrine falcon	*Falco peregrinus*	BOP		On site/**Very close**
Prairie falcon	*Falco mexicanus*	WL, BOP		Very close
Olive-sided flycatcher	*Contopus cooperi*	BCC, SSC2		Very close
Willow flycatcher	*Empidonax trailii*	CE		On site/**Very close**
Vermilion flycatcher	*Pyrocephalus rubinus*	SSC2		In region
Loggerhead shrike	*Lanius ludovicianus*	SSC2		On site/**Very close**
Yellow-billed magpie	*Pica nuttalli*	BCC		On site/**On site**
Oak titmouse	*Baeolophus inornatus*	BCC		On site/**On site**
Bank swallow	*Riparia riparia*	CT	None	Very close
Purple martin	*Progne subis*	SSC2	Unlikely	Very close
Wrentit	*Chamaea fasciata*	BCC		Very close/**Very close**
California thrasher	*Toxostoma redivivum*	BCC		Very close
Cassin's finch	*Haemorhous cassinii*	BCC		In region

Common name	*Species name*	Status[1]	Occurrence likelihood	
			DEIR	Records, Surveys
Lawrence's goldfinch	*Spinus lawrencei*	BCC		Very close/**Very close**
Modesto song sparrow	*Melospiza melodia* pop. 1	SSC	Potential	/**Very close**
Grasshopper sparrow	*Ammodramus savannarum*	SSC2		In region
Black-chinned sparrow	*Spizella atrogularis*	BCC		In region
Gray-headed junco	*Junco hyemalis caniceps*	WL		In region
Bell's sparrow	*Amphispiza b. belli*	WL		In region
Oregon vesper sparrow	*Pooecetes gramineus affinis*	SSC2		In range
Yellow-breasted chat	*Icteria virens*	SSC3		Very close
Yellow-headed blackbird	*Xanthocephalus xanthocephalus*	SSC3		Very close/**Very close**
Bullock's oriole	*Icterus bullockii*	BCC		On site/**Very close**
Tricolored blackbird	*Agelaius tricolor*	CT, BCC, SSC1	None	Very close/**Very close**
Virginia's warbler	*Leiothlypis virginiae*	WL, BCC		In region
Northern yellow warbler	*Setophaga aestiva*	SSC2		On site/**On site**
Summer tanager	*Piranga rubra*	SSC1		Very close
Little brown bat	*Myotis lucifugus*	WBWG:M		In range/**On site**
Yuma myotis	*Myotis yumanensis*	WBWG:LM		In region/**On site**
Long-eared myotis	*Myotis evotis*	WBWG:M		In range
Fringed myotis	*Myotis thysanodes*	WBWG:H		In range
Long-legged myotis	*Myotis volans*	WBWG:H		In range/**On site**
Small-footed myotis	*Myotis ciliolabrum*	WBWG:M		In range
Canyon bat	*Parastrellus hesperus*	WBWG:M		In region/**On site**
Silver-haired bat	*Lasionycteris noctivagans*	WBWG:M		In region/**On site**
Hoary bat	*Lasiurus cinereus*	WBWG:M		In region
Western red bat	*Lasiurus blossevillii*	SSC, WBWG:H		In region/**On site**
Desert red bat	*Lasiurus frantzii*	SSC, WBWG:H		In region/**On site**
Townsend's big-eared bat	*Corynorhinus townsendii*	SSC, WBWG:H		In region
Pallid bat	*Antrozous pallidus*	SSC, WBWG:H		In region
Western mastiff bat	*Eumops perotis*	SSC, WBWG:H		In range/**Very close**
Ringtail	*Bassariscus astutus*	CFP		In region
American badger	*Taxidea taxus*	SSC	Potential	In range

O4B-82
(Cont.)

[1] Listed on CDFW's Special Animals List (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406) as FT or FE = federal threatened or endangered; FC = federal candidate for listing; CT or CE = California threatened or endangered; CCT or CCE = Candidate California threatened or endangered; CFP = California Fully Protected (California Fish and Game Code 3511); SSC_i = California Species of Special Concern with i = priorities 1, 2 and 3; WL = CDFW's Taxa to Watch List; BGEPA = Bald and Golden Eagle Protection Act; WBWG = Western Bat Working Group with priority rankings, of low (L), moderate (M), and high (H); BCC = U.S. Fish and Wildlife Service's Bird of Conservation Concern (https://www.fws.gov/sites/default/files/documents/birds-of-conservation-concern-2021.pdf); and BOP = protected by Birds of Prey (California Fish and Game Code 3503.5, see https://wildlife.ca.gov/Conservation/Birds/Raptors).

The impacts analysis in CEQA review involves prediction. Impact predictions are necessary in environmental review because one cannot measure a project's impacts until after the impacts occur. The timing of this type of measurement would come too late for disclosing impacts in an environmental review, and too late for contributing to the formulation of an effective mitigation strategy or for deciding on the appropriate project alternative. As noted earlier, the accuracy of the predictions of impacts and their significance ultimately relies on the degree of accuracy in the characterization of the existing environmental setting (Figure 7).

The accuracy of impact prediction relies on experience, of which development projects subjected to CEQA review have been made amply available (Figure 8). CEQA prohibits the use of speculation to predict that potential project impacts would be less than significant (see CEQA Guidelines section 15145. SPECULATION), so it is experience that must be used. The type of experience proven most effective, and therefore most amenable to achieving CEQA's principal objectives, is scientific inference, as generally depicted in Figure 8. Scientific inference can be drawn from scientific studies or from the many other projects that have undergone CEQA review. The comparative method enables the use of scientific inference to predict impacts and to predict the efficacies of mitigation strategies, the latter of which should be also amply available in the record.

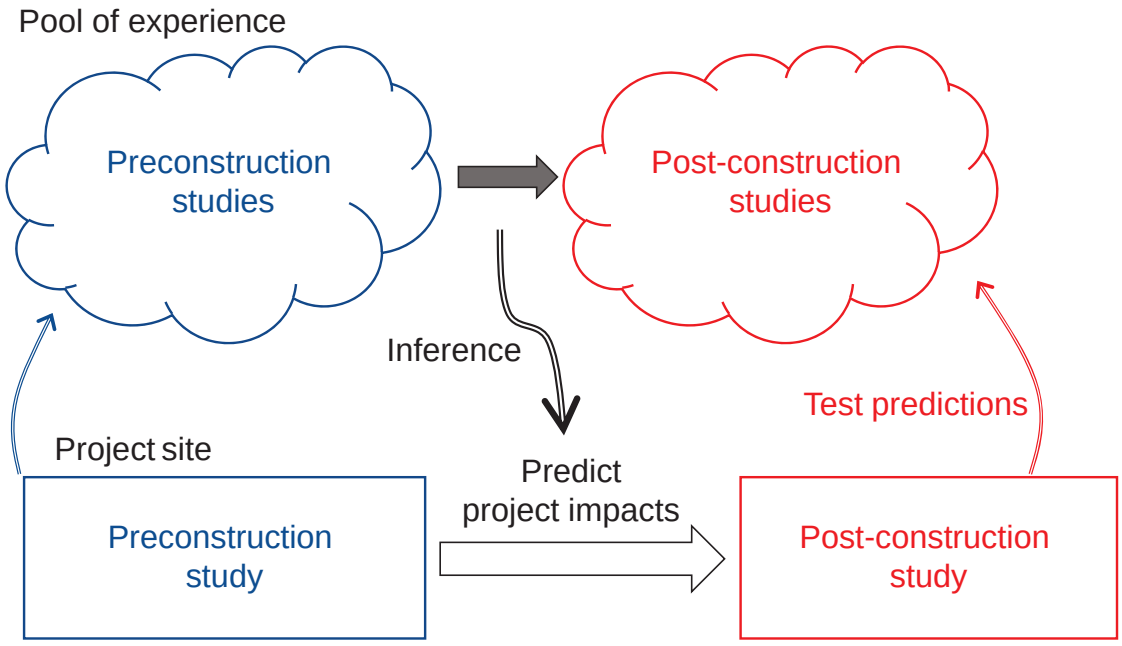


Figure 8. *A framework for arriving at predicted project impacts based on experience with other project sites. Ideally, there is a pool of similar projects in similar circumstances where predicted impacts were compared to realized impacts, and into which the proposed project can also contribute to experience.*

In the case of this project, no use is made of any data base derived from consultant surveys, mitigation efficacy, and impacts resulting from projects that had been reviewed per CEQA over the last several decades. By making no use of the information that has been made available from thousands of development projects, or even just a few of them, leaves the DEIR's disclosures of impacts unfounded and therefore inadequate. Furthermore, the DEIR cites no sources, scientific or otherwise, in its analyses of potential noise or lighting impacts on wildlife. The only source cited in relation at all to the potential impacts of artificial lights is one on how high migrating birds fly on average, which the DEIR claims is at a height domain well beyond what would interfere with avian perception and behavior. However, many thousands of migrating birds make use of the Rio Americano Area and its vicinity, and they are not always flying at 5,000 feet altitude. In summary, the DEIR fails to provide a serious analysis of potential project impacts on wildlife.

O4B-84

NOISE IMPACTS ON WILLDIFE

Wildlife rely on sound for communication and predator and prey detection. Sound perception is essential for successful reproduction and survival of wildlife. Analysis of potential impacts on wildlife from project-generated noise exposure is needed, but it is missing from the DEIR in any form other than speculation that its episodic nature would result in less-than-significant effects. The missing analysis is all the more glaring considering the high species richness inclusive of many special-status species that occur in the adjacent Rio Americano Area.

O4B-85

Regarding noise, the DEIR's analysis omitted any focus on wildlife. According to the DEIR (p. 4.2-20), "No evening noise measurements were collected south of the project site," or in other words the Parkway. The DEIR therefore lacks any baseline noise measurement in the wildlife habitat of the Parkway. I used a phone app (Decibel X) to measure sound on the Parkway, acknowledging of course that a phone app is likely less accurate than professional-grade equipment, but at least I attempted to measure it. I ran Decibel X for at least one minute to measure mean dBA. I measured means of 54.9 dBA on the early morning of 10 February, 43.5 dBA on the early morning of 30 April, and 42.4 dBA (max 46.5 dBA) at 20:50 hours on the evening of 4 June 2026. Ambient noise levels on the Parkway are lower in the evening when football games and track meets are more likely.

O4B-86

The DEIR (p. 4.2-20) reports that "reference measurements were taken during a Rio Americano High School football game hosted at nearby El Camino High School, which ... [was attended by] 3,000 people ... average noise levels (Leq) ranged from 65 to 78 dBA, with corresponding maximum levels (Lmax) of 79 to 93 dBA, depending on proximity to the crowd and speaker systems." It goes on to predict, "Using a standard point-source attenuation rate of 6 dBA per doubling distance, the estimated average levels of noise (Leq) during football games would attenuate to approximately 59 to 72 dBA Leq at 100 feet." Applying the standard point-source attenuation rate of 6 dBA per doubling distance, average noise levels can be predicted at 53 to 66 dBA at 200 feet and 47 to 60 dBA at 400 feet. Even at 400 feet into the Parkway, the average noise level would be higher than what I measured in the evening.

O4B-87

The DEIR further predicts, “The maximum reference noise levels during football games would attenuate to approximately 73 to 87 dBA Lmax at 100 feet, which would be similar to the measured daytime maximum noise level of 78 dBA Lmax under existing conditions.” Applying the standard point-source attenuation rate of 6 dBA per doubling distance, maximum noise would be predicted at up to 81 dBA at 200 feet, and up to 75 dBA at 400 feet. These sound levels would greatly exceed any sound measurement I made on the Parkway, morning or evening. O4B-88

Sound that humans might find innocuous or even pleasant can be devastating noise to wildlife populations. Animal species vary in their perception of sound due to variation in morphology and variation in exposure to sound mediated by the environments in which they live. Animal species also vary in reactions to noise (sound pollution), and in impacts caused by noise. Within each species, impacts vary by sound pressure (dBA), frequency, duration, timing of exposure within a day or season, and to what degree the same noise adversely affects predatory or competitor species; thus, no single metric, such as dBA, can adequately serve to measure impacts (McKenna et al. 2016). Noise can interfere with, and thus debilitate, either or both sound emission and sound reception from an animal species, and it can alter the animals’ physiology via tissue damage or release of stress hormones. Costs can be expressed as increased energy needed to overcome noise effects, as diminished productivity (i.e., lower reproductive output), as lower fitness, as increased mortality, and ultimately as extirpation. O4B-89

Noise impacts can contribute to habitat fragmentation, which is defined as the reduced numerical capacity of a species caused by the pattern of habitat loss or degradation (Smallwood 2015). Habitat-penetration of noise that interferes with auditory signals related to mate-attraction, territorial defense, foraging, and predator alarm-calling can degrade habitat, thereby reducing the effective population size (Anthony and Blumstein 2000). Another impact of noise is physiological stress associated with startling responses to noise and increased effort to overcome noise interference (Francis and Barber 2013). For example, increasing residential noise from 42 dB to 63 dB forced one bird species to increase its call frequency by 9%, which was significant (Slabbekoorn and Peet 2003). Noise impacts can reduce habitat patch sizes, effective movement corridor widths, and habitat connectivity, which reduces the numerical capacity of a species and therefore contributes to habitat fragmentation (Smallwood 2015). Worse, habitat-penetration of noise can transform habitat patches into ecological sinks for species attracted to the habitat for its structure connoting the availability of cover, forage and breeding opportunities, but where noise will interfere with the species’ ability to capitalize on these opportunities. Ecological sinks remove individuals of a species from habitat patches where those individuals could have functioned as members of a population had they selected a different habitat patch unpolluted by noise.

Noise affects animal behaviors, so numerical abundance around noise sources is not always the most useful metric for assessing a species’ response to noise (Pater et al. 2009, Francis and Barber 2013). Noise can change activity patterns by time of day or by spatial exposure to noise, and it can be perceived and reacted upon as false threats or false cues. Also, dBA and equivalent continuous sound levels (L_{eq}) are not necessarily O4B-90

the best ways to characterize noise that might adversely affect wildlife (Francis and Barber 2013). Sudden or episodic noises can be more disruptive to some species than continuous or regular noises, so it is helpful to characterize the spectra of noise sources. Noise impacts should be assessed within the auditory frequency range perceived by the species (Pater et al. 2009), so audiograms of each species should be compared to the acoustical spectra of sound sources (Pater et al. 2009).

O4B-90 (Cont.)

O4B-91

As an example of what can be learned from comparing avian audiograms to acoustical spectra of sound sources, Warrington et al. (2018) detected most effects of extractive energy noise "*resulted from noise frequencies with the greatest overlap with song features*." Warrington et al. (2018) found particular infrastructure generated noise that affected particular aspects of a bird's call, and these effects were measured at distances of 43 to 451 m from sources. Noise impacts on wildlife can be highly significant, but they are also complex. Whereas thorough analysis of noise impacts on each species of wildlife is likely infeasible, gross analysis is feasible and warranted.

Each special-status species likely occurring at or near the project area should be assessed for potential impacts. Where no scientific data are available for a particular species, one could make careful use of surrogate species for which data *are* available. For example, lacking measurements of noise impacts on least Bell's vireo, one could examine impacts on other species of songbirds. In one study of two frog species exposed to 65 dBA traffic noise, mate-calling frequency declined 42% (Caorsi et al. 2017). For these species, if they were to occur on the project area, mating call frequency would lessen by 42% all the way to Rio Americano Lagoon.

Another species of frog exposed to 7 days of 70 dBA traffic noise experienced 95% increase in corticosterone levels in the blood, resulting in 56% lower sperm count and 25% lower sperm viability (Kaiser et al. 2015). One might estimate effective habitat loss in this hypothetical case as 4 ha – (4 ha × 0.44 sperm count × 0.75 viable sperm) = 2.35 ha. And if a local frog species experienced the same impacts of reduced call frequency and elevated corticosterone levels, then the effective habitat loss would be the entire area exposed to 65 dBA noise.

Table 3 includes 25 special-status species of songbirds for which impacts can be predicted by existing studies of surrogate species. For example, Ware et al. (2015) measured changes in songbirds exposed to 61 dBA noise compared to 32 dBA "ambient" sound, finding an 8% decrease in foraging, 21% increase in vigilance, and 30% decrease in feeding duration. They also quantified reduced migration stopover efficiency of multiple species of songbird exposed to 61 dBA noise. Ware et al. (2015) showed that although avian habitat might look just as suitable after the introduced noise as before, its suitability declines nevertheless.

The DEIR reports only one metric of noise – dBA, and its measurement was intended for assessing impact on human receptors. No measurement of dBA was made within the natural vegetation cover of the Parkway, and no additional analysis was directed to wildlife. Not a single species of wildlife was selected for a more detailed examination of

O4B-92

what project noise would do to it. On the issue of noise impacts on wildlife, the DEIR's analysis is grossly inadequate. O4B-92 (Cont.)

ARTIFICIAL LIGHT IMPACTS ON WILDIFE

Artificial lighting causes a variety of substantial impacts on a variety of wildlife species (Rich and Longcore 2006), including interference with circadian rhythm, disruption of foraging activity, disruption of movement patterns, navigational interference and lethal attraction of flying birds, and altered development of eggs and juveniles/larvae. Added lighting could cause displacement or altered activity patterns of at least some species, resulting in habitat degradation and habitat loss. O4B-93

The DEIR claims that the project's lighting technology would allow no light to trespass into the Parkway. However, I have seen this type of claim before, and I found it to be inconsistent with observation. In its report of potential impacts of a TopGolf facility in Alviso, California, a consulting firm wrote in 2016, "The photometric plan shows that no light will travel beyond the property line (shown as 0.0). Thus, impacts from increased lighting would be less than significant." Upon my arrival to the project site well before dawn, I found metal objects brightly lit at 663 feet from the lights, and at 835 feet from the light source, a wetland was illuminated. O4B-94

Already, the skyglow over project area is brighter than all but the rarest of my project sites I have surveyed at night (based on memory, but no measurements). Even if the project's lighting does not trespass into the Parkway, as the DEIR claims, that trespass pertains only to ground illumination and not to skyglow or to the glare of looking in the direction of the lights. The DEIR needs to include a serious analysis of the effects of project-generated lighting on wildlife of the project area. O4B-95

THREAT TO THE PROJECT AREA'S AVIAN PRODUCTIVE CAPACITY

Regarding the potential project impacts consisting of habitat loss, the DEIR completely ignores the productive capacity of birds that exists on the Rio Americano Area. This capacity needs to be estimated so that it can serve as the basis from which to predict habitat losses or degradation resulting from the intrusive effects of noise, light and human traffic related to the project. The project area is known to serve as habitat to at least 127 species of vertebrate wildlife based on my surveys, and evidence suggests that the number of species on site is much larger, but the number of avian nest sites remains unknown. My reconnaissance surveys are unsuitable for counting bird nests without the focus to do so, and additionally I did not survey throughout the breeding season. The alternative method would be to infer productive capacity from estimates of total nest density elsewhere. Fortunately, I am aware of a few total nest density estimates made in similar environments. O4B-96

Of the Parkway within 500 feet of the south side of the athletic fields, there are about 1.23 acres of annual grassland, 6.65 acres of woodland, and 3.37 acres of riparian woodland (based on Google Earth imagery). In riparian woodland cover one mile north of the project area, my repeat surveys throughout the breeding season of 2023 O4B-97

supported an estimate of 28.8 nest sites/acre. This density applied to 3.37 acres on the project area results in an estimate of 97 nest sites. In similar mosaics of woodland, shrubland, and grassland, total nest densities have been estimated at 32.8/acre (Young 1948), 35.8 (Yahner 1982), and 15.59 (K. S. Smallwood, unpublished data, 2023). Applying the average, 28 nests/acre, to the 6.65 acres of this cover type on the project area results in an estimate of 186 nest sites in the average breeding season. In grassland east of Davis, my repeat surveys through the breeding season of 2024 resulted in an estimate of 5.08 nest sites/acre. Applying this density to the estimated 1.23 acres of grassland on the project area results in an estimate of 6 nest sites. Altogether I estimate 289 nest sites within 500 feet of the south site of the athletic fields. Assuming 1.39 broods per nest site based on a review of 322 North American bird species, which averaged 1.39 broods per year, then I estimate 402 nest attempts per year on the project area. Assuming Young's (1948) study site typifies bird productivity of 2.9 fledged birds per nest attempt, then I estimate 1,166 fledglings/year at the project site. Assuming an average bird generation time of 4 years, the reproductive capacity of the project area can be estimated from an equation in Smallwood (2022): {(nests/year × chicks/nest × number of years) + (2 adults/nest × nests/year) × (number of years ÷ years/generation)} ÷ (number of years) = 1,311 birds per year lost as a result of the project.

O4B-97 (Cont.)

The infiltration of project-caused light, noise and human traffic into the Parkway would not result in the loss of all avian productive capacity, but rather some fraction of it. If 20%, then habitat loss/degradation would result in the annual loss of 262 birds. If 40%, then habitat loss/degradation would result in the annual loss of 524 birds. The DEIR needs to be revised to estimate the loss. The same type of analysis is also needed for northwestern pond turtle, bats, and other special-status species of wildlife.

INTERFERENCE WITH WILDLIFE MOVEMENT

O4B-98

One of CEQA's principal concerns regarding potential project impacts is whether a proposed project would interfere with wildlife movement in the region. Unfortunately, this concern has not motivated any serious analysis of whether or how the project would interfere with wildlife movement in the region. The DEIR acknowledges that the Parkway is an established wildlife movement corridor, but it nevertheless concludes (p. 4.2-24), "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)." It dismisses the effects of noise and light pollution on wildlife movement, predicting that project noise and light would be no greater than existing levels. However, the DEIR offers inadequate analysis in support of this claim. Nor does the DEIR address the increase in human travel on the Parkway to and from sporting events, and the degrees to which this travel would interfere with wildlife movement on the Parkway.

FLAWED CUMULATIVE IMPACTS ANALYSIS

O4B-99

One of CEQA's principal concerns regarding potential project impacts is whether a proposed project would contribute significantly to cumulative impacts of past, present

and future projects, or to multiple types of impacts that are cumulatively considerable. Unfortunately, the DEIR fails to seriously analyze the project's contributions to cumulative impacts on biological resources. According to the DEIR (p. 7-5), "this project will not contribute to any permanent habitat loss or significant, unavoidable impacts to biological resources." However, the DEIR fails to report any quantification of habitat loss of any species resulting from project-caused noise and light penetration into the Rio Americano Area. The DEIR's quoted statement is conclusory.

O4B-99 (Cont.)

The DEIR's conclusion is based on its premise on pp. 4.2-15 and 7-6 that "no sensitive biological resources or special-status species have been identified on the project site…" However, Fettke (2026) reports having seen about 60 yellow-billed magpies on the athletic fields, and this species is a special-status species. I detected many more special-status species on the project area. The DEIR's premise is inaccurate, and its conclusion is therefore unfounded.

O4B-100

The list of past, present, and probable future projects in the vicinity of Rio Americano High School is too short, as it includes no past projects and fails to include all probable future projects. Past projects have surrounded Rio Americano High School with residential development on three sides, leaving its athletic fields the only open space in the area that abuts the Rio Americano Area. Its situation leaves the athletic fields an attractant to ground-nesting birds such as killdeer, and to a long list of foraging wildlife such as bats and raptors, and to a long list of species such as yellow-billed magpie that organize socially in open spaces. Past projects have exacerbated the cumulative impacts on wildlife that would no longer be able to rely on the athletic fields as part of their habitat, and that would lose habitat in the Parkway due to light and noise or increased human intrusion.

The list is also short on probable future projects, as it omits the large residential development being planned on the Kassis property only one mile north in the City of Rancho Cordova. It also omits the Army Corps of Engineers plan to remove hundreds of trees from the American River to rock the River's banks. The DEIR's list of past, present, and probable future projects is incomplete.

O4B-101

<u>90-Foot-Tall Wireless Communication Tower</u>

The DEIR includes on its list of projects that could contribute cumulative impacts a new 90-foot-tall monopole wireless communications tower and supporting equipment, including a shelter and backup generator to be installed just west of the campus cafeteria. Consistent with the DEIR's argument that the four 80-foot-tall, high-mast light standards would pose no risk of collision mortality to birds due to their narrow surface areas, the DEIR also claims that the wireless communications tower would also pose no risk of collision. However, having studied collision mortality of birds and bats with wind turbines for 25 years, one of the most important lessons I learned was that in the case of birds, much of the collision risk of wind turbines is in the structure rather than in the moving parts (the blades). For the most part, wind turbines need to be operative for collisions to occur with golden eagles and bats, but most birds appear to be at greater risk of collision when the turbines are inoperative – when there are no sounds

O4B-102

or visuals to alert birds of the collision hazard. I found that when the wind turbines were broken or shut down, collision mortality remained the same for most birds (Smallwood and Bell 2020). This same risk is posed to birds by monopole towers such as the towers of the proposed project and the tower of the wireless communication facility . In fact, the tower height is about the same as the heights of many of the wind turbines I studied.

O4B-102 (Cont.)

Scant research has been directed toward avian collision mortality with cell towers specifically. A three-year study involving periodic fatality searches around two 140-foot cell towers and a control plot yielded a control-adjusted fatality detection rate of 14 birds per tower per year (Dickey and Gates 2009). This rate was not adjusted for carcass persistence or searcher detection rate, so it is biased low. Assuming carcass persistence rates are similar across the USA, and assuming the overall carcass detection rate was similar my estimate from 1-day searcher exposures to placed bird carcasses in the Altamont Pass Wind Resource Area (Smallwood et al. 2018), then an adjustment factor of 0.6 would be appropriate. Fourteen birds per tower per year divided by 0.6 would predict 23.3 bird collision fatalities per tower per year at the proposed project and its identified cumulative impact project – the cell tower, or a total 117 birds per year among the five new towers. And for every bird fatality that strands chicks on the nest, the collision-caused mortality increases accordingly.

O4B-103

And then there is the effects of radiofrequency radiation (RFR) from the cell tower. Organisms from nematodes to vertebrates can sense and respond to naturally occurring, low-level, nonionizing electromagnetic fields (EMF), including across the EMF spectrum referred to as RFR. However, an organism's natural responses to EMF can be interfered by anthropogenic EMF including RFR from cell towers and other sources (Levitt et al. 2022a,b). RFR can interfere with orientation and migration, foraging, breeding, and survivorship, and may very well contribute to recent and ongoing species extinctions (Levitt et al. 2022a). Existing RFR exposure standards apply to humans, but these standards are inadequate for use with non-human species, because many species are much more sensitive to RFR than are humans. Wild animals are therefore vulnerable to additional installations of communication cell towers.

Insects have shown particular vulnerability to anthropogenic EMF exposure Levitt et al. 2022b). This increased vulnerability bodes poorly for threatened and endangered species such as monarch. It also bodes poorly for vertebrate wildlife that depend on an insect food base. A decline of insects would threaten the continued existence of multiple bat species, as well as swallows, swifts, warblers, thrushes, vireos, and many other types of birds.

Adverse effects of exposure to RFR from cell towers have been measured in many types of animals (Sivani and Sudarsanam 2012). Honey bees experienced colony collapse after only 10 minutes of exposure. Compared to tadpoles protected in a Faraday cage, the tadpoles of a frog in Spain (*Rana temporaria*) experienced 90% mortality when exposed to RFR from a cell tower located 140 m away, as well as deformities, slowed development, and nonsynchronous movement. Birds exposed to RFR from cell towers have abandoned their nest sites. House sparrows in the UK disappeared with the spread of cell tower installations. Exposure to RFR caused adverse neurological and cardiac

O4B-104

effects in rodents and rabbits, and bats exposed to cell tower installations declined in numbers. Most studies on the effects of RFR on plants, wildlife, bees, birds and humans found adverse effects of cell tower RFR exposure (Sivani and Sudarsanam 2012). O4B-104 (Cont.)

FLAWED MITIGATION STRATEGY

The mitigation strategy needs to be based on the first five environmental review steps in Figure 6 to species occurrence likelihoods, characterize the wildlife community, and predict impacts. However, the DEIR's mitigation strategy lacks sufficient nexus to these steps. Many species have yet to be documented on the site, and many have not been assessed for occurrence likelihoods. The DEIR denies that there would be any significant impacts on special-status species of wildlife, and it therefore fails to predict magnitudes of impacts. O4B-105

My comments follow in regular font the summary of each required mitigation measure in italics.

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*. O4B-106

Should the project go forward, a worker education program should be implemented. However, having implemented a worker education program myself, I can say that the conservation benefits of such a program would be *de minimis* relative to project impacts. A worker education program cannot avoid the permanent loss of wildlife habitat caused by light and noise pollution nor the wildlife collision mortality that would chronically occur with automobiles.

Furthermore, it needs to be remembered that construction workers operate heavy machinery and otherwise work around heavy machinery and moving vehicles. Workers primarily need to be aware of their construction work performance and their safety. It is misleading to imply that a worker education program is going to result in increased worker vigilance for any member of a special-status species in harm's way. Vigilance for wildlife might be desired of construction workers, but it is not what should be expected. O4B-107

Lastly, the DEIR reports no evidence that demonstrates the efficacy of this measure. As I commented in my reference to Figure 8, the outcomes of mitigation strategies of thousands of projects reviewed under CEQA are available to inform on the efficacy of this measure. O4B-109

Mitigation Measure 4.2-1b: Best Management Practices for Biological Resources *Construction staging, storage, and parking areas will be within* O4B-110

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. … A qualified biologist will be on-call to advise or assist with relocating any entrapped wildlife, as necessary.

Should the project go forward, implementation of BMPs and construction monitoring by a qualified biologist should be required. However, having served in this role myself, I can say that the conservation benefits of construction BMPs and construction monitoring would be *de minimis* relative to project impacts. Construction BMPs and monitoring would not avoid the permanent loss of habitat caused by light and noise pollution, the effects of the culmination of habitat fragmentation in the area, and the collision mortality from automobiles that would follow.

O4B-110 (Cont.)

The DEIR reports no evidence that demonstrates the efficacy of this measure. As I commented in my reference to Figure 8, the outcomes of mitigation strategies of thousands of projects reviewed under CEQA are available to inform on the efficacy of this measure.

O4B-111

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 … 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*.

O4B-112

Should the project go forward, implementation of MM 4.2-1c should be required. However, having seen this type of measure applied to blue elderberry shrubs at a nearby project site, I suggest more is needed for enforceability. There needs to be reporting on implementation, as well as one or more clearly defined penalties for failures to implement as the measure is worded.

Even with implementation of MM 4.2-1c, it needs to be understood that it would do nothing to avoid impacts of noise and artificial light exposure to valley elderberry longhorn beetle.

O4B-113

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.). … If any life stage of northwestern pond turtle is encountered during construction, all activities within a 50-foot radius of*

O4B-114

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. ...

O4B-114 (Cont.)

Should the project go forward, implementation of MM 4.2-1d should be required. However, this measure would apply only to potential construction impacts, and not to any impacts later caused by project-generated noise and light and increased human intrusion onto the Parkway.

Mitigation Measure 4.2-1e: Nesting Bird Protections. *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). ... 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*.

O4B-115

If the project goes forward, then preconstruction surveys for nesting birds should be implemented, at least with best intentions in mind. However, this step would prove overwhelming considering the number of nests that occur on the project area and how well birds hide them, and considering that MM 4.2-1e requires the survey to be completed within 3 days of the initiation of construction activities. I estimate the site supports 289 avian nest sites in the average breeding season. These nests would require more than one biologist to simultaneously survey for nest sites and buffer them. However, MM 4.2-1e refers to "a qualified biologist," indicating the commitment of a single biologist to find and buffer or monitor an estimated 289 nest sites on the project area. This measure is not credible as written.

Preconstruction, take-avoidance surveys should consist of two steps, both of which are very difficult. First, the biologist(s) performing the survey must identify birds that are breeding. Second, the biologist(s) must locate the breeding birds' nests. The first step is typically completed by observing bird behaviors such as food deliveries and nest territory defense. To be successful, these types of observations typically require many surveys on many dates spread throughout the breeding season even for a single species. To identify and locate the birds of all species nesting on a site would require a large portion of the avian breeding season. Many bird nests would be missed, especially those of lesser goldfinches, Anna's hummingbirds and other small birds. O4B-116

Even assuming MM 4.2-1e could credibly locate and buffer or monitor all 289 nests I estimate on the project area, it would not avoid the permanent loss/degradation of habitat. After the breeding season of the preconstruction survey, there would be reduced production of birds from the project area, while project-generated light, noise and human traffic would emerge as chronic sources of injury, mortality and displacement. The project's impact on birds would be permanent and of large magnitude. The conservation benefits of the measure would be *de minimis* relative to project impacts on avian nesting. However, MM 4.2-1e is not credible due to the large number of nests on the project area. O4B-117

Furthermore, as noted earlier, the mitigation language allows for an individual biologist to make a subjective decision, outside the public's view, to determine buffer areas and buffer timing for the nest sites of any given species. This measure lacks objective criteria, and it is therefore unenforceable. O4B-118

Lastly, the DEIR reports no evidence that demonstrates the efficacy of this measure. As I commented in my reference to Figure 8, the outcomes of mitigation strategies of thousands of projects reviewed under CEQA are available to inform on the efficacy of this measure. O4B-119

NEEDED MITIGATION MEASURES

Lighting: Instead of installing and using 5,700 K lights, the DEIR should require amber lights or lights less than or equal to 3,000 K. The DEIR should require no color-changing show lighting, and no upward-aimed light fixtures. It should require full shielding of lights toward the Parkway. O4B-120

Further, the DEIR should require that lights be turned off within a fixed time after each event; I suggest 15 minutes. The DEIR should require a maximum number of nights allowed for use of stadium lights; I suggest 6 nights during the football season and 5 nights during the track and field season, and 12 nights per year. O4B-121

Noise: The DEIR should require a curfew to minimize noise infiltrating the Parkway at night; I suggest 90 minutes after sunset. It should also require a noise limit at the nearest trees/shrubs of the Parkway; I suggest 58 dBA. O4B-122

To mitigate the effects of both noise and light on Parkway wildlife, the trees in the row of trees along the south side of the athletic fields need to be protected. There also needs to be a plan of replacement of trees along this row that naturally senesce. The appropriate species of trees to replace the existing trees upon senescence needs to be identified and required. These trees need to provide sufficient height and foliage density to effectively block noise and light, and they should be native species that will eventually replace the non-native species in this row of trees. O4B-123

Human Intrusion of the Parkway: The DEIR needs to require enforceable measures to discourage attendees of sporting or other events in the new stadium from entering the Parkway after the events. The measure needs to emphasize the prevention of event attendees from visiting the lagoon area after dark, and of entering the Parkway after dark with electric bikes and scooters. O4B-124

Bats: Bats can roost within cavities, but they can also roost within or on various other substrates, such as on tree bark and clumps of leaves (Kunz and Lumsden 2003). Rather than focusing on roost sites, project impacts on bats would be more effectively measured by a standardized bat detection rate. I suggest before and after measurements of bat activity by conducting two 2-hour surveys in mid-July, mid-August and mid-September, one survey at each of two stations. One station should be located along the row of trees along the south edge of the athletic fields, and the other station located at the station I used on my 10 September 2026 survey at UTM NAD83 643422 E, 4271041 N. The number of surveys in one summer/fall season would therefore be six. The DEIR should require at least one season of surveys before project construction, though at least two years would be more reliable. Post-project monitoring should continue for at least five years after project construction. O4B-125 O4B-126

Survey methods should be based on guidance provided by Sonobat (https://sonobat.com/). The surveys should be conducted by a qualified biologist familiar with Sonobat. Generally, the surveys should include the use of a suitable detector attached atop a pole at least 4 m above ground and oriented toward empty airspace. Surveys should begin 15 minutes after sundown, and they should continue for the subsequent two hours. The two metrics to compare before and after construction are (1) number of detected passes/hour, and (2) number of bat species confirmed by Sonobat or by manual vetting of sonograms by the qualified biologist.

Action thresholds need to be established in case measurement of the metrics reveal declines of bats. One threshold should be applied to passage rates; I suggest a 20% decline in any post-construction year should prompt the implementation of alternative mitigation measures. Another threshold should be applied to the number of species; I suggest the loss of two species in a post-construction year should prompt the implementation of alternative mitigation measures. Alternative measures could include compensation in the form of habitat protection. O4B-127

MISLEADING ALTERNATIVES ANALYSIS

O4B-128

The DEIR describes Project Alternative 2 as the relocation of the football/track stadium to the northeastern corner of the campus along American River Drive, but it commits only a brief discussion of it. According to the DEIR (p. 6-7), "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." Despite this admission, the DEIR speculates that Alternative 2 offers no benefits to wildlife over the Preferred Alternative.

O4B-129

The DEIR's analysis of Alternative 2 specific to wildlife is misleading (p. 6-8): "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." Construction impacts might be prolonged under Alternative 2, but their duration would be slight compared to the duration and magnitudes of operational impacts. Under Alternative 2, noise impacts on wildlife in the Parkway would be greatly reduced, as would project-generated human traffic into the Parkway. The wildlife community of the Rio Americano Area is too rich and too valued by the public (Photos 47 and 48) to justify the selection of the Preferred Alternative over Alternative 2. It is my opinion that Alternative 2 would be the environmentally superior Alternative over the Preferred Alternative.



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Shawn Smallwood, Ph.D.

LITERATURE CITED

O4B-130

Anthony, L.L., and D.T. Blumstein. 2000. Integrating behavior into wildlife conservation: the multiple ways that behavior can reduce N_e. Biological Conservation 95:303-315.

Caorsi, V. Z., C. Both, S. Cechin, R. Antunes, and M. Borges-Martins. 2017. Effects of traffic noise on the calling behavior of two Neotropical hylid frogs. PLoS ONE 12(8): e0183342. https://doi.org/10.1371/journal.pone.0183342

County of Sacramento. 2006. American River Parkway Plan 2006. Municipal Services Agency, Planning and Community Development Department.

Dickey, S. D. and J. E. Gates. 2009 The Effect of Cell Towers on Birds and Bats at Rock Creek Park, Washington, D.C. Report to National Park Service, Rock Creek Park, Washington, D.C.

O4B-130
(Cont.)

Fettke, K. 2026. Rio Americano High School Bat Survey Results. Memo to San Juan Unified School District.

Francis, C. D. and J. R. Barber. 2013. A framework for understanding noise impacts on wildlife: an urgent conservation priority. Frontiers in Ecology and Environment 11:305–313. doi:10.1890/120183

Hall, L. S., P. R. Krausman, and M. L. Morrison. 1997. The habitat concept and a plea for standard terminology. Wildlife Society Bulletin 25:173-82.

Illner, H. 1992. Road deaths of Westphalian owls: methodological problems, influence of road type and possible effects on population levels. Pp. 94-100 in C. A. Galbraith, I. R. Taylor, and S. Percival, eds. The ecology and conservation of European owls. Peterborough, Joint Nature Conservation Committee, UK Nature Conservation No. 5.

Kaiser, K., J. Devito, C. G. Jones, A. Marentes, R. Perez, L. Umeh, R. M. Weickum, K. E. McGovern, E. H. Wilson, and W. Saltzman. 2015. Effects of anthropogenic noise on endocrine and reproductive function in White's treefrog, *Litoria caerulea*. Conservation Physiology 3: doi:10.1093/conphys/cou061.

Keilsohn, W., D. L. Narango, and D. W. Tallamy. 2018. Roadside habitat impacts insect traffic mortality. Journal of Insect Conservation https://doi.org/10.1007/s10841-018-0051-2

Kunz, T. H., and L. F. Lumsden. 2003. Ecology of cavity and foliage roosting bats. Pages 3–89 in T. H. Kunz and M. B. Fenton, Eds., Bat ecology. The University of Chicago Press, Chicago.

Levitt, B. B., H. C. Lai, and A. M. Manville, II. 2022a. Effects of non-ionizing electromagnetic fields on flora and fauna, Part 2 impacts: how species interact with natural and man-made EMF. Review Environ Health 2022; 37(3): 327–406. https://doi.org/10.1515/reveh-2021-0050

Levitt, B. B., H. C. Lai, and A. M. Manville, II. 2022b. Low-level EMF effects on wildlife and plants: What research tells us about an ecosystem approach. Frontiers in Public Health 10:1000840. doi: 10.3389/fpubh.2022.1000840

McKenna, M. F., G. Shannon, and K. Fristrup. 2016. Characterizing anthropogenic noise to improve understanding and management of impacts to wildlife. Endangered Species Research 31:279-291. doi: 10.3354/esr00760

National Research Council. 1986. Ecological knowledge and environmental problem-solving: concepts and case studies. National Academy Press, Washington, D.C.

O4B-130 (Cont.)

Pater, L. L., T. G. Grubb, and D. D. Delaney. 2009. Recommendations for improved assessment of noise impacts on wildlife. Journal of Wildlife Management 73(5):788–795.

Rich, C., and T. Longcore. 2006. Ecological consequences of artificial night lighting. Island Press, Covelo, California.

Slabbekoorn, H. and M. Peet. 2003. Birds sing at a higher pitch in urban noise. Nature 424:267.

Sivani, S., and D. Sudarsanam. 2012. Impacts of radio-frequency electromagnetic field (RF-EMF) from cell phone towers and wireless devices on biosystem and ecosystem – a review. Biology and Medicine 4 (4): 202–216.

Smallwood, K.S. 2002. Habitat models based on numerical comparisons. Pages 83-95 *in* Predicting species occurrences: Issues of scale and accuracy, J. M. Scott, P. J. Heglund, M. Morrison, M. Raphael, J. Haufler, and B. Wall, editors. Island Press, Covello, California.

Smallwood, K. S. 2015. Habitat fragmentation and corridors. Pages 84-101 in M. L. Morrison and H. A. Mathewson, Eds., Wildlife habitat conservation: concepts, challenges, and solutions. John Hopkins University Press, Baltimore, Maryland.

Smallwood, K. S. 2022. Utility-scale solar impacts to volant wildlife. Journal of Wildlife Management: e22216. https://doi.org/10.1002/jwmg.22216

Smallwood, K. S., and D. A. Bell. 2020. Effects of wind turbine curtailment on bird and bat fatalities. Journal of Wildlife Management 84:684-696. DOI: https://doi.org/10.1002/jwmg.21844

Smallwood, K. S., and N. L. Smallwood. 2023. Measured effects of anthropogenic development on vertebrate wildlife diversity. Diversity 15, 1037. https://doi.org/10.3390/d15101037.

Smallwood, K.S., S. Geng, and M. Zhang. 2001. Comparing pocket gopher (*Thomomys bottae*) density in alfalfa stands to assess management and conservation goals in northern California. Agriculture, Ecosystems & Environment 87: 93-109.

Smallwood, K. S., D. A. Bell, E. L. Walther, E. Leyvas, S. Standish, J. Mount, B. Karas. 2018. Estimating wind turbine fatalities using integrated detection trials. Journal of Wildlife Management 82:1169-1184.

Taylor, R. A. J., and L. R. Taylor. 1979. A behavioral model for the evolution of spatial dynamics. Pp. 1-28 in R. M. Anderson, B. D. Turner, and L. R. Taylor (editors). Population dynamics. Blackwell Scientific Publications, Oxford.

Ware, H. E., C. J. W. McClure, J. D. Carlisle, and J. R. Barber. 2015. A phantom road experiment reveals traffic noise is an invisible source of habitat degradation. PNAS 112:12105-12109.

Warrington, M. H., C. M. Curry, B. Antze, and N. Koper. 2018. Noise from four types of extractive energy infrastructure affects song features of Savannah Sparrows. The Condor 120(1):1-15.

Yahner, R. H. 1982. Avian nest densities and nest-site selection in farmstead shelterbelts. The Wilson Bulletin 94:156-175.

Young, H. 1948. A comparative study of nesting birds in a five-acre park. The Wilson Bulletin 61:36-47.

O4B-130 (Cont.)



O4B-131

Photo 47. *California quail on the American River Trail at the project area, 30 April 2026.*



Photo 48. *Wood duck on project area, 30 April 2026.*

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Curriculum Vitae

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Business **Smallwood Ecology**

- Employs Noriko Smallwood, M.S., Environmental Science with focus on wildlife

Expertise

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- Finding solutions to controversial problems related to wildlife interactions with anthropogenic infrastructure and activities;
- Design of field study to detect, enumerate, or monitor wildlife and behavior patterns by visual search, GPS, thermal imaging, and acoustic bat survey;
- Using systems analysis and experimental design principles to identify meaningful ecological patterns from that can inform conservation and management of terrestrial wildlife.

Education

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Ph.D. Ecology, University of California, Davis. September 1990.
M.S. Ecology, University of California, Davis. June 1987.
B.S. Anthropology, University of California, Davis. June 1985.
Corcoran High School, Corcoran, California. June 1981.

Experience

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- 1,072 professional reports, including:
- 96 peer reviewed publications
- 24 in non-reviewed proceedings
- 950 reports, declarations, posters and book reviews
- 8 in mass media outlets
- 98 public presentations of research results

Expert testimony regarding potential impacts from development projects: To check on the accuracy of the characterization of wildlife communities at sites of proposed residential, commercial and industrial projects, I perform visual-scan surveys for

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wildlife, thermal-imaging at night, and acoustic detection of bats using a Petterson M500 detector and Sonobat Live to identify bats by sonograms of their calls. I predict project impacts and I compare my findings to those in the environmental review documents. I also testify on potential outcomes of water transfers and water transfer delivery systems, endangered species recovery plans, Habitat Conservation Plans, Natural Communities Conservation Programs, proposed Federal Rules and State and Federal policies and regulations affecting wildlife. I deliver oral testimony to government agencies, Tribunals, Boards of Supervisors and City Councils, and participated with press conferences and depositions. I prepare expert witness reports and court declarations, and I participate with depositions.

Editing for scientific journals: Guest Editor, *Wildlife Society Bulletin*, 2012-2013, of invited papers representing international views on the impacts of wind energy on wildlife and how to mitigate the impacts. Associate Editor, *Journal of Wildlife Management*, March 2004 to 30 June 2007. Editorial Board Member, *Environmental Management*, 10/1999 to 8/2004. Associate Editor, *Biological Conservation*, 9/1994 to 9/1995.

Member, Alameda County Scientific Review Committee (SRC), August 2006 to April 2011. The five-member committee investigated causes of bird and bat collisions in the Altamont Pass Wind Resource Area, and recommended mitigation and monitoring measures. The SRC reviewed the science underlying the Alameda County Avian Protection Program, and it advised the County on how to reduce wildlife collision mortality.

Consulting Ecologist, 2004-2007, California Energy Commission (CEC). Provided consulting services as needed to the CEC on renewable energy impacts, monitoring and research, and produced several reports. Also collaborated with Lawrence-Livermore National Lab on research to understand and reduce wind turbine impacts on wildlife.

Consulting Ecologist, 1999-2013, U.S. Navy. Performed endangered species surveys, hazardous waste site monitoring, and habitat restoration for the endangered San Joaquin kangaroo rat, California tiger salamander, California red-legged frog, California clapper rail, western burrowing owl, salt marsh harvest mouse, and other species at Naval Air Station Lemoore; Naval Weapons Station, Seal Beach, Detachment Concord; Naval Security Group Activity, Skaggs Island; National Radio Transmitter Facility, Dixon; and, Naval Outlying Landing Field Imperial Beach.

Part-time Lecturer, 1998-2005, California State University, Sacramento. Instructed Mammalogy, Behavioral Ecology, and Ornithology Lab, Contemporary Environmental Issues, Natural Resources Conservation.

Senior Ecologist, 1999-2005, BioResource Consultants. Designed and implemented research and monitoring studies related to avian fatalities at wind turbines, avian electrocutions on electric distribution poles across California, and avian fatalities at transmission lines.

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Chairman, Conservation Affairs Committee, The Wildlife Society--Western Section, 1999-2001. Prepared position statements and led efforts directed toward conservation issues, including travel to Washington, D.C. to lobby Congress for more wildlife conservation funding.

Systems Ecologist, 1995-2000, Institute for Sustainable Development. Headed ISD's program on integrated resources management. Developed indicators of ecological integrity for large areas, using remotely sensed data, local community involvement and GIS.

Associate, 1997-1998, Department of Agronomy and Range Science, University of California, Davis. Worked with Professor Shu Geng and Dr. Mingua Zhang on several studies related to wildlife interactions with agriculture and patterns of fertilizer and pesticide residues in groundwater across a large landscape.

Lead Scientist, 1996-1999, National Endangered Species Network. Informed academic scientists and environmental activists about emerging issues regarding the Endangered Species Act and other environmental laws. Testified at public hearings on endangered species issues.

Ecologist, 1997-1998, Western Foundation of Vertebrate Zoology. Conducted field research to determine the impact of past mercury mining on the status of California red-legged frogs in Santa Clara County, California.

Senior Systems Ecologist, 1994-1995, EIP Associates, Sacramento, California. Provided consulting services in environmental planning, and quantitative assessment of land units for their conservation and restoration opportunities based on ecological resource requirements of 29 special-status species. Developed ecological indicators for prioritizing areas within Yolo County to receive mitigation funds for habitat easements and restoration.

Post-Graduate Researcher, 1990-1994, Department of Agronomy and Range Science, *U.C. Davis*. Under Dr. Shu Geng's mentorship, studied landscape and management effects on temporal and spatial patterns of abundance among pocket gophers and species of Falconiformes and Carnivora in the Sacramento Valley. Managed and analyzed a database of energy use in California agriculture. Assisted with landscape (GIS) study of groundwater contamination across Tulare County, California.

Work experience in graduate school: Co-taught Conservation Biology with Dr. Christine Schonewald, 1991 & 1993, UC Davis Graduate Group in Ecology; Reader for Dr. Richard Coss's course on Psychobiology in 1990, UC Davis Department of Psychology; Research Assistant to Dr. Walter E. Howard, 1988-1990, UC Davis Department of Wildlife and Fisheries Biology, testing durable baits for pocket gopher management in forest clearcuts; Research Assistant to Dr. Terrell P. Salmon, 1987-1988, UC Wildlife Extension, Department of Wildlife and Fisheries Biology, developing empirical models of mammal and bird invasions in North America, and a rating system for priority research and control of exotic species based on economic, environmental and human

health hazards in California. Student Assistant to Dr. E. Lee Fitzhugh, 1985-1987, UC Cooperative Extension, Department of Wildlife and Fisheries Biology, developing and implementing statewide mountain lion track count for long-term monitoring.

Fulbright Research Fellow, Indonesia, 1988. Tested use of new sampling method for numerical monitoring of Sumatran tiger and six other species of endemic felids, and evaluated methods used by other researchers.

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Projects and Studies

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Repowering wind energy projects through careful siting of new wind turbines using map-based collision hazard models to minimize impacts to volant wildlife. Funded by wind companies (principally NextEra Renewable Energy, Inc.), California Energy Commission and East Bay Regional Park District, I collaborated with a GIS analyst and managed a crew of five field biologists performing golden eagle behavior surveys and nocturnal surveys on bats and owls. I also collaborated, and continue to collaborate with, Dr. Douglas Bell in a GPS telemetry study of 44 golden eagles originating from the northern Diablo Range. The goal was to quantify flight patterns for development of predictive models to more carefully site new wind turbines in repowering projects. I performed focused behavior surveys from May 2012 through 2019, and golden eagle telemetry monitoring from 2013 through the present. Collision hazard models were prepared for eight wind projects, three of which were built.

Test avian safety of new mixer-ejector wind turbine (MEWT). Designed and implemented a before-after, control-impact experimental design to test the avian safety of a new, shrouded wind turbine developed by Ogin Inc. (formerly known as FloDesign Wind Turbine Corporation). Supported by a $718,000 grant from the California Energy Commission's Public Interest Energy Research program and a 20% match share contribution from Ogin, I managed a crew of seven field biologists who performed periodic fatality searches and behavior surveys, carcass detection trials, nocturnal behavior surveys using a thermal camera, and spatial analyses with the collaboration of a GIS analyst. Field work began 1 April 2012 and ended 30 March 2015 without Ogin installing its MEWTs, but we still achieved multiple important scientific advances.

Reduce avian mortality due to wind turbines at Altamont Pass. Studied wildlife impacts caused by 5,400 wind turbines at the world's most notorious wind resource area. Studied how impacts are perceived by monitoring and how they are affected by terrain, wind patterns, food resources, range management practices, wind turbine operations, seasonal patterns, population cycles, infrastructure management such as electric distribution, animal behavior and social interactions.

Reduce avian mortality on electric distribution poles. Directed research toward reducing bird electrocutions on electric distribution poles, 2000-2007. Oversaw 5 founds of fatality searches at 10,000 poles from Orange County to Glenn County, California, and produced two large reports.

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Cook et al. v. Rockwell International et al., No. 90-K-181 (D. Colorado). Provided expert testimony on the role of burrowing animals in affecting the fate of buried and surface-deposited radioactive and hazardous chemical wastes at the Rocky Flats Plant, Colorado. Provided expert reports based on four site visits and an extensive document review of burrowing animals. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals. I testified in federal court in November 2005, and my clients were subsequently awarded a $553,000,000 judgment by a jury. After appeals the award was increased to two billion dollars.

Hanford Nuclear Reservation Litigation. Provided expert testimony on the role of burrowing animals in affecting the fate of buried radioactive wastes at the Hanford Nuclear Reservation, Washington. Provided three expert reports based on three site visits and extensive document review. Predicted and verified a certain population density of pocket gophers on buried waste structures, as well as incidence of radionuclide contamination in body tissue. Conducted transect surveys for evidence of burrowing animals and other wildlife on and around waste facilities. Discovered substantial intrusion of waste structures by burrowing animals.

Protocol-level surveys for special-status species. Used California Department of Fish and Wildlife and US Fish and Wildlife Service protocols to search for California red-legged frog, California tiger salamander, arroyo southwestern toad, blunt-nosed leopard lizard, western pond turtle, giant kangaroo rat, San Joaquin kangaroo rat, San Joaquin kit fox, western burrowing owl, Swainson's hawk, Valley elderberry longhorn beetle and other special-status species.

Conservation of San Joaquin kangaroo rat. Performed research to identify factors responsible for the decline of this endangered species at Lemoore Naval Air Station, 2000-2013, and implemented habitat enhancements designed to reverse the trend and expand the population.

Impact of West Nile Virus on yellow-billed magpies. Funded by Sacramento-Yolo Mosquito and Vector Control District, 2005-2008, compared survey results pre- and post-West Nile Virus epidemic for multiple bird species in the Sacramento Valley, particularly on yellow-billed magpie and American crow due to susceptibility to WNV.

Workshops on HCPs. Assisted Dr. Michael Morrison with organizing and conducting a 2-day workshop on Habitat Conservation Plans, sponsored by Southern California Edison, and another 1-day workshop sponsored by PG&E. These Workshops were attended by academics, attorneys, and consultants with HCP experience. We guest-edited a Proceedings published in Environmental Management.

Mapping of biological resources along Highways 101, 46 and 41. Used GPS and GIS to delineate vegetation complexes and locations of special-status species along 26 miles of highway in San Luis Obispo County, 14 miles of highway and roadway in Monterey County, and in a large area north of Fresno, including within reclaimed gravel mining pits.

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GPS mapping and monitoring at restoration sites and at Caltrans mitigation sites. Monitored the success of elderberry shrubs at one location, the success of willows at another location, and the response of wildlife to the succession of vegetation at both sites. Also used GPS to monitor the response of fossorial animals to yellow star-thistle eradication and natural grassland restoration efforts at Bear Valley in Colusa County and at the decommissioned Mather Air Force Base in Sacramento County.

Mercury effects on Red-legged Frog. Assisted Dr. Michael Morrison and US Fish and Wildlife Service in assessing the possible impacts of historical mercury mining on the federally listed California red-legged frog in Santa Clara County. Also measured habitat variables in streams.

Opposition to proposed No Surprises rule. Wrote a white paper and summary letter explaining scientific grounds for opposing the incidental take permit (ITP) rules providing ITP applicants and holders with general assurances they will be free of compliance with the Endangered Species Act once they adhere to the terms of a "properly functioning HCP." Submitted 188 signatures of scientists and environmental professionals concerned about No Surprises rule US Fish and Wildlife Service, National Marine Fisheries Service, all US Senators.

Natomas Basin Habitat Conservation Plan alternative. Designed narrow channel marsh to increase the likelihood of survival and recovery in the wild of giant garter snake, Swainson's hawk and Valley Elderberry Longhorn Beetle. The design included replication and interspersion of treatments for experimental testing of critical habitat elements. I provided a report to Northern Territories, Inc.

Assessments of agricultural production system and environmental management in China. Twice visited China and interviewed scientists, industrialists, agriculturalists, and the Directors of the Chinese Environmental Protection Agency and the Department of Agriculture to assess opportunities for research collaboration in the environmental and agricultural sectors.

Yolo County Habitat Conservation Plan. Conducted landscape ecology study of Yolo County to spatially prioritize allocation of mitigation efforts to improve ecosystem functionality within the County from the perspective of 29 special-status species of wildlife and plants. Used a hierarchically structured indicators approach to apply principles of landscape and ecosystem ecology, conservation biology, and local values in rating land units. Derived GIS maps to help guide the conservation area design, and then developed implementation strategies.

Mountain lion track count. Developed and conducted a carnivore monitoring program throughout California since 1985. Species counted include mountain lion, bobcat, black bear, coyote, red and gray fox, raccoon, striped skunk, badger, and black-tailed deer. Vegetation and land use are also monitored. Track survey transect was established on dusty, dirt roads within randomly selected quadrats.

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Sumatran tiger and other felids. Upon award of Fulbright Research Fellowship, I designed and initiated track counts for seven species of wild cats in Sumatra, including Sumatran tiger, fishing cat, and golden cat. Spent four months on Sumatra and Java in 1988, and learned Bahasa Indonesia, the official Indonesian language.

Wildlife in agriculture. Beginning as post-graduate research, I studied pocket gophers and other wildlife in 40 alfalfa fields throughout the Sacramento Valley, and I surveyed for wildlife along a 200-mile road transect since 1989 with a hiatus of 1996-2004. The data are analyzed using GIS and methods from landscape ecology, and the results published and presented orally to farming groups in California and elsewhere. I also conducted the first study of wildlife in cover crops used on vineyards and orchards.

Agricultural energy use and Tulare County groundwater study. Developed and analyzed a data base of energy use in California agriculture, and collaborated on a landscape (GIS) study of groundwater contamination across Tulare County, California.

Pocket gopher damage in forest clear-cuts. Developed gopher sampling methods and tested various poison baits and baiting regimes in the largest-ever field study of pocket gopher management in forest plantations, involving 68 research plots in 55 clear-cuts among 6 National Forests in northern California.

Risk assessment of exotic species in North America. Developed empirical models of mammal and bird species invasions in North America, as well as a rating system for assigning priority research and control to exotic species in California, based on economic, environmental, and human health hazards.

Peer Reviewed Publications

O4B-138

Smallwood, K. S., and D. A. Bell. 2025. On the Spatial distribution of eagle carcasses around wind turbines: implications for collision mortality estimation. Diversity 2025, 17, 686. https://doi.org/10.3390/d17100686

Smallwood, K. S. 2025. Background Mortality of Wildlife on Renewable Energy Projects. Diversity 2025, 17, 628. https://doi.org/10.3390/d17090628

Smallwood, K. S. and M. L. Morrison. 2024. Burrowing owls require mutualist species and ample interior habitat space. Diversity 2024, 16, 590. https://doi.org/10.3390/d16090590

Smallwood, K. S., and N. L. Smallwood. 2023. Measured effects of anthropogenic development on vertebrate wildlife diversity. Diversity 15, 1037. https://doi.org/10.3390/d15101037.

Bell, D. A., S. A. Snyder, J. E. DiDonato, and K. S. Smallwood. 2023. Conspecific carcass removal from a wind project study plot by a great horned owl (*Bubo Virginanus*). Journal of Raptor Research 57:489-492.

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Kitano, M., K. S. Smallwood, and K. Fukaya. 2022. Bird carcass detection from integrated trials at multiple wind farms. Journal of Wildlife Management: In press.

Smallwood, K. S. 2022. Utility-scale solar impacts to volant wildlife. Journal of Wildlife Management: e22216. https://doi.org/10.1002/jwmg.22216

Smallwood, K. S., and N. L. Smallwood. 2021. Breeding density and collision mortality of loggerhead shrike (*Lanius ludovicianus*) in the Altamont Pass Wind Resource Area. Diversity 13, 540. https://doi.org/10.3390/d13110540.

Smallwood, K. S. 2020. USA wind energy-caused bat fatalities increase with shorter fatality search intervals. Diversity 12(98); https://doi.org/10.3390/d12030098

Smallwood, K. S., D. A. Bell, and S. Standish. 2020. Dogs detect larger wind energy impacts on bats and birds. Journal of Wildlife Management 84:852-864. DOI: 10.1002/jwmg.21863.

Smallwood, K. S., and D. A. Bell. 2020a. Effects of wind turbine curtailment on bird and bat fatalities. Journal of Wildlife Management 84:684-696. DOI: 10.1002/jwmg.21844

Smallwood, K. S., and D. A. Bell. 2020b. Relating bat passage rates to wind turbine fatalities. Diversity 12(84); doi:10.3390/d12020084.

Kitano, M., M. Ino, K. S. Smallwood, and S. Shiraki. 2020. Seasonal difference in carcass persistence rates at wind farms with snow, Hokkaido, Japan. Ornithological Science 19: 63 – 71.

Smallwood, K. S. and M. L. Morrison. 2018. Nest-site selection in a high-density colony of burrowing owls. Journal of Raptor Research 52:454-470.

Smallwood, K. S., D. A. Bell, E. L. Walther, E. Leyvas, S. Standish, J. Mount, B. Karas. 2018. Estimating wind turbine fatalities using integrated detection trials. Journal of Wildlife Management 82:1169-1184.

Smallwood, K. S. 2017. Long search intervals under-estimate bird and bat fatalities caused by wind turbines. Wildlife Society Bulletin 41:224-230.

Smallwood, K. S. 2017. The challenges of addressing wildlife impacts when repowering wind energy projects. Pages 175-187 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

May, R., Gill, A. B., Köppel, J. Langston, R. H.W., Reichenbach, M., Scheidat, M., Smallwood, S., Voigt, C. C., Hüppop, O., and Portman, M. 2017. Future research directions to reconcile wind turbine–wildlife interactions. Pages 255-276 in Köppel, J., Editor, Wind Energy and Wildlife Impacts: Proceedings from the CWW2015 Conference. Springer. Cham, Switzerland.

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(Cont.)

Smallwood, K. S. 2017. Monitoring birds. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Smallwood, K. S., L. Neher, and D. A. Bell. 2017. Turbine siting for raptors: an example from Repowering of the Altamont Pass Wind Resource Area. M. Perrow, Ed., Wildlife and Wind Farms - Conflicts and Solutions, Volume 2. Pelagic Publishing, Exeter, United Kingdom. www.bit.ly/2v3cR9Q

Johnson, D. H., S. R. Loss, K. S. Smallwood, W. P. Erickson. 2016. Avian fatalities at wind energy facilities in North America: A comparison of recent approaches. Human–Wildlife Interactions 10(1):7-18.

Sadar, M. J., D. S.-M. Guzman, A. Mete, J. Foley, N. Stephenson, K. H. Rogers, C. Grosset, K. S. Smallwood, J. Shipman, A. Wells, S. D. White, D. A. Bell, and M. G. Hawkins. 2015. Mange Caused by a novel Micnemidocoptes mite in a Golden Eagle (*Aquila chrysaetos*). Journal of Avian Medicine and Surgery 29(3):231-237.

Smallwood, K. S. 2015. Habitat fragmentation and corridors. Pages 84-101 in M. L. Morrison and H. A. Mathewson, Eds., Wildlife habitat conservation: concepts, challenges, and solutions. John Hopkins University Press, Baltimore, Maryland, USA.

Mete, A., N. Stephenson, K. Rogers, M. G. Hawkins, M. Sadar, D. Guzman, D. A. Bell, J. Shipman, A. Wells, K. S. Smallwood, and J. Foley. 2014. Emergence of Knemidocoptic mange in wild Golden Eagles (Aquila chrysaetos) in California. Emerging Infectious Diseases 20(10):1716-1718.

Smallwood, K. S. 2013. Introduction: Wind-energy development and wildlife conservation. Wildlife Society Bulletin 37: 3-4.

Smallwood, K. S. 2013. Comparing bird and bat fatality-rate estimates among North American wind-energy projects. Wildlife Society Bulletin 37:19-33. + Online Supplemental Material.

Smallwood, K. S., L. Neher, J. Mount, and R. C. E. Culver. 2013. Nesting burrowing owl abundance in the Altamont Pass Wind Resource Area, California. Wildlife Society Bulletin: 37:787-795.

Smallwood, K. S., D. A. Bell, B. Karas, and S. A. Snyder. 2013. Response to Huso and Erickson Comments on Novel Scavenger Removal Trials. Journal of Wildlife Management 77: 216-225.

Bell, D. A., and K. S. Smallwood. 2010. Birds of prey remain at risk. Science 330:913.

Smallwood, K. S., D. A. Bell, S. A. Snyder, and J. E. DiDonato. 2010. Novel scavenger removal trials increase estimates of wind turbine-caused avian fatality rates. Journal of Wildlife Management 74: 1089-1097 + Online Supplemental Material.

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Smallwood, K. S., L. Neher, and D. A. Bell. 2009. Map-based repowering and reorganization of a wind resource area to minimize burrowing owl and other bird fatalities. Energies 2009(2):915-943. http://www.mdpi.com/1996-1073/2/4/915

Smallwood, K. S. and B. Nakamoto. 2009. Impacts of West Nile Virus epizootic on yellow-billed magpie, american crow, and other birds in the Sacramento Valley, California. The Condor 111:247-254.

Smallwood, K. S., L. Rugge, and M. L. Morrison. 2009. Influence of behavior on bird mortality in wind energy developments: The Altamont Pass Wind Resource Area, California. Journal of Wildlife Management 73:1082-1098.

Smallwood, K. S. and B. Karas. 2009. Avian and bat fatality rates at old-generation and repowered wind turbines in California. Journal of Wildlife Management 73:1062-1071.

Smallwood, K. S. 2008. Wind power company compliance with mitigation plans in the Altamont Pass Wind Resource Area. Environmental & Energy Law Policy Journal 2(2):229-285.

Smallwood, K. S., C. G. Thelander. 2008. Bird mortality in the Altamont Pass Wind Resource Area, California. Journal of Wildlife Management 72:215-223.

Smallwood, K. S. 2007. Estimating wind turbine-caused bird mortality. Journal of Wildlife Management 71:2781-2791.

Smallwood, K. S., C. G. Thelander, M. L. Morrison, and L. M. Rugge. 2007. Burrowing owl mortality in the Altamont Pass Wind Resource Area. Journal of Wildlife Management 71:1513-1524.

Cain, J. W. III, K. S. Smallwood, M. L. Morrison, and H. L. Loffland. 2005. Influence of mammal activity on nesting success of Passerines. J. Wildlife Management 70:522-531.

Smallwood, K.S. 2002. Habitat models based on numerical comparisons. Pages 83-95 *in* Predicting species occurrences: Issues of scale and accuracy, J. M. Scott, P. J. Heglund, M. Morrison, M. Raphael, J. Haufler, and B. Wall, editors. Island Press, Covello, California.

Morrison, M. L., K. S. Smallwood, and L. S. Hall. 2002. Creating habitat through plant relocation: Lessons from Valley elderberry longhorn beetle mitigation. Ecological Restoration 21: 95-100.

Zhang, M., K. S. Smallwood, and E. Anderson. 2002. Relating indicators of ecological health and integrity to assess risks to sustainable agriculture and native biota. Pages 757-768 *in* D.J. Rapport, W.L. Lasley, D.E. Rolston, N.O. Nielsen, C.O. Qualset, and A.B. Damania (eds.), Managing for Healthy Ecosystems, Lewis Publishers, Boca Raton, Florida USA.

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(Cont.)

Wilcox, B. A., K. S. Smallwood, and J. A. Kahn. 2002. Toward a forest Capital Index. Pages 285-298 *in* D.J. Rapport, W.L. Lasley, D.E. Rolston, N.O. Nielsen, C.O. Qualset, and A.B. Damania (eds.), Managing for Healthy Ecosystems, Lewis Publishers, Boca Raton, Florida USA.

Smallwood, K.S. 2001. The allometry of density within the space used by populations of Mammalian Carnivores. Canadian Journal of Zoology 79:1634-1640.

Smallwood, K.S., and T.R. Smith. 2001. Study design and interpretation of Sorex density estimates. Annales Zoologi Fennici 38:141-161.

Geng, S., Yixing Zhou, Minghua Zhang, and K. Shawn Smallwood. 2001. A sustainable agro-ecological solution to water shortage in North China Plain (Huabei Plain). Environmental Planning and Management 44:345-355.

Smallwood, K. Shawn, Lourdes Rugge, Stacia Hoover, Michael L. Morrison, Carl Thelander. 2001. Intra- and inter-turbine string comparison of fatalities to animal burrow densities at Altamont Pass. Pages 23-37 in S. S. Schwartz, ed., Proceedings of the National Avian-Wind Power Planning Meeting IV. RESOLVE, Inc., Washington, D.C.

Smallwood, K.S., S. Geng, and M. Zhang. 2001. Comparing pocket gopher (*Thomomys bottae*) density in alfalfa stands to assess management and conservation goals in northern California. Agriculture, Ecosystems & Environment 87: 93-109.

Smallwood, K. S. 2001. Linking habitat restoration to meaningful units of animal demography. Restoration Ecology 9:253-261.

Smallwood, K.S., A. Gonzales, T. Smith, E. West, C. Hawkins, E. Stitt, C. Keckler, C. Bailey, and K. Brown. 2000. Suggested standards for science applied to conservation issues. Transactions of the Western Section of the Wildlife Society 36:40-49.

Smallwood, K. S. 2000. A crosswalk from the Endangered Species Act to the HCP Handbook and real HCPs. Environmental Management 26, Supplement 1:23-35.

Smallwood, K. S., J. Beyea and M. Morrison. 1999. Using the best scientific data for endangered species conservation. Environmental Management 24:421-435.

Smallwood, K. S. 1999. Scale domains of abundance among species of Mammalian Carnivora. Environmental Conservation 26:102-111.

Smallwood, K.S. 1999. Suggested study attributes for making useful population density estimates. Transactions of the Western Section of the Wildlife Society 35: 76-82.

Smallwood, K. S. and M. L. Morrison. 1999. Estimating burrow volume and excavation rate of pocket gophers (Geomyidae). Southwestern Naturalist 44:173-183.

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(Cont.)

Smallwood, K. S. and M. L. Morrison. 1999. Spatial scaling of pocket gopher (*Geomyidae*) density. Southwestern Naturalist 44:73-82.

Smallwood, K. S. 1999. Abating pocket gophers (*Thomomys* spp.) to regenerate forests in clearcuts. Environmental Conservation 26:59-65.

Smallwood, K. S. 1998. Patterns of black bear abundance. Transactions of the Western Section of the Wildlife Society 34:32-38.

Smallwood, K. S. 1998. On the evidence needed for listing northern goshawks (*Accipter gentilis*) under the Endangered Species Act: a reply to Kennedy. J. Raptor Research 32:323-329.

Smallwood, K. S., B. Wilcox, R. Leidy, and K. Yarris. 1998. Indicators assessment for Habitat Conservation Plan of Yolo County, California, USA. Environmental Management 22: 947-958.

Smallwood, K. S., M. L. Morrison, and J. Beyea. 1998. Animal burrowing attributes affecting hazardous waste management. Environmental Management 22: 831-847.

Smallwood, K. S, and C. M. Schonewald. 1998. Study design and interpretation for mammalian carnivore density estimates. Oecologia 113:474-491.

Zhang, M., S. Geng, and K. S. Smallwood. 1998. Nitrate contamination in groundwater of Tulare County, California. Ambio 27(3):170-174.

Smallwood, K. S. and M. L. Morrison. 1997. Animal burrowing in the waste management zone of Hanford Nuclear Reservation. Proceedings of the Western Section of the Wildlife Society Meeting 33:88-97.

Morrison, M. L., K. S. Smallwood, and J. Beyea. 1997. Monitoring the dispersal of contaminants by wildlife at nuclear weapons production and waste storage facilities. The Environmentalist 17:289-295.

Smallwood, K. S. 1997. Interpreting puma (*Puma concolor*) density estimates for theory and management. Environmental Conservation 24(3):283-289.

Smallwood, K. S. 1996. Managing vertebrates in cover crops: a first study. American Journal of Alternative Agriculture 11:155-160.

Smallwood, K. S. and S. Geng. 1997. Multi-scale influences of gophers on alfalfa yield and quality. Field Crops Research 49:159-168.

Smallwood, K. S. and C. Schonewald. 1996. Scaling population density and spatial pattern for terrestrial, mammalian carnivores. Oecologia 105:329-335.

Smallwood, K. S., G. Jones, and C. Schonewald. 1996. Spatial scaling of allometry for terrestrial, mammalian carnivores. Oecologia 107:588-594.

Van Vuren, D. and K. S. Smallwood. 1996. Ecological management of vertebrate pests in agricultural systems. Biological Agriculture and Horticulture 13:41-64.

Smallwood, K. S., B. J. Nakamoto, and S. Geng. 1996. Association analysis of raptors on an agricultural landscape. Pages 177-190 in D.M. Bird, D.E. Varland, and J.J. Negro, eds., Raptors in human landscapes. Academic Press, London.

Erichsen, A. L., K. S. Smallwood, A. M. Commandatore, D. M. Fry, and B. Wilson. 1996. White-tailed Kite movement and nesting patterns in an agricultural landscape. Pages 166-176 in D. M. Bird, D. E. Varland, and J. J. Negro, eds., Raptors in human landscapes. Academic Press, London.

Smallwood, K. S. 1995. Scaling Swainson's hawk population density for assessing habitat-use across an agricultural landscape. J. Raptor Research 29:172-178.

Smallwood, K. S. and W. A. Erickson. 1995. Estimating gopher populations and their abatement in forest plantations. Forest Science 41:284-296.

Smallwood, K. S. and E. L. Fitzhugh. 1995. A track count for estimating mountain lion *Felis concolor californica* population trend. Biological Conservation 71:251-259

Smallwood, K. S. 1994. Site invasibility by exotic birds and mammals. Biological Conservation 69:251-259.

Smallwood, K. S. 1994. Trends in California mountain lion populations. Southwestern Naturalist 39:67-72.

Smallwood, K. S. 1993. Understanding ecological pattern and process by association and order. Acta Oecologica 14(3):443-462.

Smallwood, K. S. and E. L. Fitzhugh. 1993. A rigorous technique for identifying individual mountain lions *Felis concolor* by their tracks. Biological Conservation 65:51-59.

Smallwood, K. S. 1993. Mountain lion vocalizations and hunting behavior. The Southwestern Naturalist 38:65-67.

Smallwood, K. S. and T. P. Salmon. 1992. A rating system for potential exotic vertebrate pests. Biological Conservation 62:149-159.

Smallwood, K. S. 1990. Turbulence and the ecology of invading species. Ph.D. Thesis, University of California, Davis.

O4B-138 (Cont.)

O4B-139

Peer-reviewed Reports

O4B-139
(Cont.)

Smallwood, K. S., and L. Neher. 2017. Comparing bird and bat use data for siting new wind power generation. Report CEC-500-2017-019, California Energy Commission Public Interest Energy Research program, Sacramento, California. http://www.energy.ca.gov/2017publications/CEC-500-2017-019/CEC-500-2017-019.pdf and http://www.energy.ca.gov/2017publications/CEC-500-2017-019/CEC-500-2017-019-APA-F.pdf

Smallwood, K. S. 2016. Bird and bat impacts and behaviors at old wind turbines at Forebay, Altamont Pass Wind Resource Area. Report CEC-500-2016-066, California Energy Commission Public Interest Energy Research program, Sacramento, California. http://www.energy.ca.gov/publications/displayOneReport.php? pubNum=CEC-500-2016-066

Sinclair, K. and E. DeGeorge. 2016. Framework for Testing the Effectiveness of Bat and Eagle Impact-Reduction Strategies at Wind Energy Projects. S. Smallwood, M. Schirmacher, and M. Morrison, eds., Technical Report NREL/TP-5000-65624, National Renewable Energy Laboratory, Golden, Colorado.

Brown, K., K. S. Smallwood, J. Szewczak, and B. Karas. 2016. Final 2012-2015 Report Avian and Bat Monitoring Project Vasco Winds, LLC. Prepared for NextEra Energy Resources, Livermore, California.

Brown, K., K. S. Smallwood, J. Szewczak, and B. Karas. 2014. Final 2013-2014 Annual Report Avian and Bat Monitoring Project Vasco Winds, LLC. Prepared for NextEra Energy Resources, Livermore, California.

Brown, K., K. S. Smallwood, and B. Karas. 2013. Final 2012-2013 Annual Report Avian and Bat Monitoring Project Vasco Winds, LLC. Prepared for NextEra Energy Resources, Livermore, California. http://www.altamontsrc.org/alt_doc/p274_ventus_vasco_winds_2012_13_avian_bat_monitoring_report_year_1.pdf

Smallwood, K. S., L. Neher, D. Bell, J. DiDonato, B. Karas, S. Snyder, and S. Lopez. 2009. Range Management Practices to Reduce Wind Turbine Impacts on Burrowing Owls and Other Raptors in the Altamont Pass Wind Resource Area, California. Final Report to the California Energy Commission, Public Interest Energy Research – Environmental Area, Contract No. CEC-500-2008-080. Sacramento, California. 183 pp. https://tethys.pnnl.gov/publications/range-management-practices-reduce-wind-turbine-impacts-burrowing-owls-other-raptors

Smallwood, K. S., and L. Neher. 2009. Map-Based Repowering of the Altamont Pass Wind Resource Area Based on Burrowing Owl Burrows, Raptor Flights, and Collisions with Wind Turbines. Final Report to the California Energy Commission, Public Interest Energy Research – Environmental Area, Contract No. CEC-500-2009-065. Sacramento, California. http://www.energy.ca.gov/publications/displayOneReport.php?pubNum=CEC-500-2009-065

O4B-139 (Cont.)

Smallwood, K. S., K. Hunting, L. Neher, L. Spiegel and M. Yee. 2007. A framework to screen wind power sites for potential impacts to birds in California. Final Report to the California Energy Commission, Public Interest Energy Research – Environmental Area, Contract No. Submitted but not published. Sacramento, California.

Smallwood, K. S. and C. Thelander. 2005. Bird mortality in the Altamont Pass Wind Resource Area, March 1998 – September 2001 Final Report. National Renewable Energy Laboratory, NREL/SR-500-36973. Golden, Colorado. https://www.nrel.gov/docs/fy05osti/36973.pdf

Smallwood, K. S. and C. Thelander. 2004. Developing methods to reduce bird mortality in the Altamont Pass Wind Resource Area. Final Report to the California Energy Commission, Public Interest Energy Research – Environmental Area, Contract No. 500-01-019. Sacramento, California. 531 pp. https://tethys.pnnl.gov/publications/developing-methods-reduce-bird-mortality-altamont-pass-wind-resource-area

Thelander, C.G. S. Smallwood, and L. Rugge. 2003. Bird risk behaviors and fatalities at the Altamont Pass Wind Resource Area. Period of Performance: March 1998—December 2000. National Renewable Energy Laboratory, NREL/SR-500-33829. U.S. Department of Commerce, National Technical Information Service, Springfield, Virginia. 86 pp.

Thelander, C.G., S. Smallwood, and L. Rugge. 2001. Bird risk behaviors and fatalities at the Altamont Wind Resource Area – a progress report. Proceedings of the American Wind Energy Association, Washington D.C. 16 pp.

Non-Peer Reviewed Publications

O4B-140

Smallwood, K. S. 2026. Burrowing Owls (*Athene cunicularia*) in the Altamont Pass Wind Resource Area. Report to East Bay Regional Park District. 218 pp.

Smallwood, K. S., L. Neher, and D. A. Bell. 2023. Golden eagle roost sites based on telemetry data. Report to Salka Energy, San Diego, California. 29 pp.

Smallwood, K. S. 2009. Methods manual for assessing wind farm impacts to birds. Bird Conservation Series 26, Wild Bird Society of Japan, Tokyo. T. Ura, ed., in English with Japanese translation by T. Kurosawa. 90 pp.

Smallwood, K. S. 2009. Mitigation in U.S. Wind Farms. Pages 68-76 in H. Hötker (Ed.), Birds of Prey and Wind Farms: Analysis of problems and possible solutions. Documentation of an International Workshop in Berlin, 21st and 22nd October 2008. Michael-Otto-Instiut im NABU, Goosstroot 1, 24861 Bergenhusen, Germany. http://bergenhusen.nabu.de/forschung/greifvoegel/

Smallwood, K. S. 2007. Notes and recommendations on wildlife impacts caused by Japan's wind power development. Pages 242-245 in Yukihiro Kominami, Tatsuya Ura,

O4B-140
(Cont.)

Koshitawa, and Tsuchiya, Editors, Wildlife and Wind Turbine Report 5. Wild Bird Society of Japan, Tokyo.

Thelander, C.G. and S. Smallwood. 2007. The Altamont Pass Wind Resource Area's Effects on Birds: A Case History. Pages 25-46 in Manuela de Lucas, Guyonne F.E. Janss, Miguel Ferrer Editors, Birds and Wind Farms: risk assessment and mitigation. Madrid: Quercus.

Smallwood, K. S. and C. Thelander. 2006. Response to third review of Smallwood and Thelander (2004). In Terry Surles and Edward Vine, Eds., Avian/Wind Statistical Peer Review Project. Report to California Energy Commission. Contract No. 500-02-004. https://tethys.pnnl.gov/sites/default/files/publications/Surles-2006.pdf

Neher, L. and S. Smallwood. 2005. Forecasting and minimizing avian mortality in siting wind turbines. Energy Currents. Fall Issue. ESRI, Inc., Redlands, California.

Jennifer Davidson and Shawn Smallwood. 2004. Laying plans for a hydrogen highway. Comstock's Business, August 2004:18-20, 22, 24-26.

Jennifer Davidson and Shawn Smallwood. 2004. Refined conundrum: California consumers demand more oil while opposing refinery development. Comstock's Business, November 2004:26-27, 29-30.

Smallwood, K.S. 2002. Review of "The Atlas of Endangered Species." By Richard Mackay. Environmental Conservation 30:210-211.

Smallwood, K.S. 2002. Review of "The Endangered Species Act. History, Conservation, and Public Policy." By Brian Czech and Paul B. Krausman. Environmental Conservation 29: 269-270.

Smallwood, K.S. 1997. Spatial scaling of pocket gopher (Geomyidae) burrow volume. Abstract in Proceedings of 44th Annual Meeting, Southwestern Association of Naturalists. Department of Biological Sciences, University of Arkansas, Fayetteville.

Smallwood, K.S. 1997. Estimating prairie dog and pocket gopher burrow volume. Abstract in Proceedings of 44th Annual Meeting, Southwestern Association of Naturalists. Department of Biological Sciences, University of Arkansas, Fayetteville.

Smallwood, K.S. 1997. Animal burrowing parameters influencing toxic waste management. Abstract in Proceedings of Meeting, Western Section of the Wildlife Society.

Smallwood, K.S, and Bruce Wilcox. 1996. Study and interpretive design effects on mountain lion density estimates. Abstract, page 93 in D.W. Padley, ed., *Proceedings 5th Mountain Lion Workshop*, Southern California Chapter, The Wildlife Society. 135 pp.

O4B-140
(Cont.)

Smallwood, K.S, and Bruce Wilcox. 1996. Ten years of mountain lion track survey. Page 94 in D.W. Padley, ed. Abstract, page 94 in D.W. Padley, ed., *Proceedings 5th Mountain Lion Workshop*, Southern California Chapter, The Wildlife Society. 135 pp.

Smallwood, K.S, and M. Grigione. 1997. Photographic recording of mountain lion tracks. Pages 75-75 in D.W. Padley, ed., *Proceedings 5th Mountain Lion Workshop*, Southern California Chapter, The Wildlife Society. 135 pp.

Smallwood, K.S., B. Wilcox, and J. Karr. 1995. An approach to scaling fragmentation effects. Brief 8, Ecosystem Indicators Working Group, 17 March, 1995. Institute for Sustainable Development, Thoreau Center for Sustainability – The Presidio, PO Box 29075, San Francisco, CA 94129-0075.

Wilcox, B., and K.S. Smallwood. 1995. Ecosystem indicators model overview. Brief 2, Ecosystem Indicators Working Group, 17 March, 1995. Institute for Sustainable Development, Thoreau Center for Sustainability – The Presidio, PO Box 29075, San Francisco, CA 94129-0075.

EIP Associates. 1996. Yolo County Habitat Conservation Plan. Yolo County Planning and Development Department, Woodland, California.

Geng, S., K.S. Smallwood, and M. Zhang. 1995. Sustainable agriculture and agricultural sustainability. Proc. 7th International Congress SABRAO, 2nd Industrial Symp. WSAA. Taipei, Taiwan.

Smallwood, K.S. and S. Geng. 1994. Landscape strategies for biological control and IPM. Pages 454-464 in W. Dehai, ed., Proc. International Conference on Integrated Resource Management for Sustainable Agriculture. Beijing Agricultural University, Beijing, China.

Smallwood, K.S. and S. Geng. 1993. Alfalfa as wildlife habitat. California Alfalfa Symposium 23:105-8.

Smallwood, K.S. and S. Geng. 1993. Management of pocket gophers in Sacramento Valley alfalfa. California Alfalfa Symposium 23:86-89.

Smallwood, K.S. and E.L. Fitzhugh. 1992. The use of track counts for mountain lion population census. Pages 59-67 in C. Braun, ed. Mountain lion-Human Interaction Symposium and Workshop. Colorado Division of Wildlife, Fort Collins.

Smallwood, K.S. and E.L. Fitzhugh. 1989. Differentiating mountain lion and dog tracks. Pages 58-63 in Smith, R.H., ed. Proc. Third Mountain Lion Workshop. Arizona Game and Fish Department, Phoenix.

Fitzhugh, E.L. and K.S. Smallwood. 1989. Techniques for monitoring mountain lion population levels. Pages 69-71 in Smith, R.H., ed. Proc. Third Mountain Lion Workshop. Arizona Game and Fish Department, Phoenix.

O4B-140
(Cont.)

Reports to or by Alameda County Scientific Review Committee (Note: all documents linked to SRC website have since been removed by Alameda County)

Smallwood, K. S. 2014. Data Needed in Support of Repowering in the Altamont Pass WRA. SRC document P284, County of Alameda, Hayward, California.

Smallwood, K. S. 2013. Long-Term Trends in Fatality Rates of Birds and Bats in the Altamont Pass Wind Resource Area, California. SRC document R68, County of Alameda, Hayward, California.

Smallwood, K. S. 2013. Inter-annual Fatality rates of Target Raptor Species from 1999 through 2012 in the Altamont Pass Wind Resources Area. SRC document P268, County of Alameda, Hayward, California.

Smallwood, K. S. 2012. General Protocol for Performing Detection Trials in the FloDesign Study of the Safety of a Closed-bladed Wind Turbine. SRC document P246, County of Alameda, Hayward, California.

Smallwood, K. S., l. Neher, and J. Mount. 2012. Burrowing owl distribution and abundance study through two breeding seasons and intervening non-breeding period in the Altamont Pass Wind Resource Area, California. SRC document P245, County of Alameda, Hayward, California.

Smallwood, K. S 2012. Draft study design for testing collision risk of Flodesign wind turbine in former AES Seawest wind projects in the Altamont Pass Wind Resource Area (APWRA). SRC document P238, County of Alameda, Hayward, California.

Smallwood, L. Neher, and J. Mount. 2012. Winter 2012 update on burrowing owl distribution and abundance study in the Altamont Pass Wind Resource Area, California. SRC document P232, County of Alameda, Hayward, California.

Smallwood, S. 2012. Status of avian utilization data collected in the Altamont Pass Wind Resource Area, 2005-2011. SRC document P231, County of Alameda, Hayward, California.

Smallwood, K. S., L. Neher, and J. Mount. 2011. Monitoring Burrow Use of Wintering Burrowing Owls. SRC document P229, County of Alameda, Hayward, California.

Smallwood, K. S., L. Neher, and J. Mount. 2011. Nesting Burrowing Owl Distribution and Abundance in the Altamont Pass Wind Resource Area, California. SRC document P228, County of Alameda, Hayward, California.

Smallwood, K. S. 2011. Draft Study Design for Testing Collision Risk of Flodesign Wind Turbine in Patterson Pass Wind Farm in the Altamont Pass Wind Resource Area (APWRA).

O4B-140
(Cont.)

http://www.altamontsrc.org/alt_doc/p100_src_document_list_with_reference_numbers.pdf

Smallwood, K. S. 2011. Sampling Burrowing Owls Across the Altamont Pass Wind Resource Area. SRC document P205, County of Alameda, Hayward, California.

Smallwood, K. S. 2011. Proposal to Sample Burrowing Owls Across the Altamont Pass Wind Resource Area. SRC document P155, County of Alameda, Hayward, California. SRC document P198, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Comments on APWRA Monitoring Program Update**.** SRC document P191, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Inter-turbine Comparisons of Fatality Rates in the Altamont Pass Wind Resource Area. SRC document P189, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Review of the December 2010 Draft of M-21: Altamont Pass Wind Resource Area Bird Collision Study. SRC document P190, County of Alameda, Hayward, California.

Alameda County SRC (Shawn Smallwood, Jim Estep, Sue Orloff, Joanna Burger, and Julie Yee). Comments on the Notice of Preparation for a Programmatic Environmental Impact Report on Revised CUPs for Wind Turbines in the Alameda County portion of the Altamont Pass. SRC document P183, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Review of Monitoring Implementation Plan. SRC document P180, County of Alameda, Hayward, California.

Burger, J., J. Estep, S. Orloff, S. Smallwood, and J. Yee. 2010. SRC Comments on CalWEA Research Plan. SRC document P174, County of Alameda, Hayward, California.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). SRC Comments on Monitoring Team's Draft Study Plan for Future Monitoring. SRC document P168, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Second Review of American Kestrel-Burrowing owl (KB) Scavenger Removal Adjustments Reported in Alameda County Avian Monitoring Team's M21 for the Altamont Pass Wind Resource Area. SRC document P171, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Assessment of Three Proposed Adaptive Management Plans for Reducing Raptor Fatalities in the Altamont Pass Wind Resource Area. SRC document P161, County of Alameda, Hayward, California.

Smallwood, K. S. and J. Estep. 2010. Report of additional wind turbine hazard ratings in the Altamont Pass Wind Resource Area by Two Members of the Alameda County

O4B-140
(Cont.)

Scientific Review Committee. SRC document P153, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Alternatives to Improve the Efficiency of the Monitoring Program. SRC document P158, County of Alameda, Hayward, California.

Smallwood, S. 2010. Summary of Alameda County SRC Recommendations and Concerns and Subsequent Actions. SRC document P147, County of Alameda, Hayward, California.

Smallwood, S. 2010. Progress of Avian Wildlife Protection Program & Schedule. SRC document P148, County of Alameda, Hayward, California. SRC document P148, County of Alameda, Hayward, California.

Smallwood, S. 2010. Old-generation wind turbines rated for raptor collision hazard by Alameda County Scientific Review Committee in 2010, an Update on those Rated in 2007, and an Update on Tier Rankings. SRC document P155, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Review of American Kestrel-Burrowing owl (KB) Scavenger Removal Adjustments Reported in Alameda County Avian Monitoring Team's M21 for the Altamont Pass Wind Resource Area. SRC document P154, County of Alameda, Hayward, California.

Smallwood, K. S. 2010. Fatality Rates in the Altamont Pass Wind Resource Area 1998-2009. Alameda County SRC document P-145.

Smallwood, K. S. 2010. Comments on Revised M-21: Report on Fatality Monitoring in the Altamont Pass Wind Resource Area. SRC document P144, County of Alameda, Hayward, California.

Smallwood, K. S. 2009. SRC document P129, County of Alameda, Hayward, California.

Smallwood, K. S. 2009. Smallwood's review of M32. SRC document P111, County of Alameda, Hayward, California.

Smallwood, K. S. 2009. 3rd Year Review of 16 Conditional Use Permits for Windworks, Inc. and Altamont Infrastructure Company, LLC. Comment letter to East County Board of Zoning Adjustments. 10 pp + 2 attachments.

Smallwood, K. S. 2008. Weighing Remaining Workload of Alameda County SRC against Proposed Budget Cap. Alameda County SRC document not assigned. 3 pp.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). 2008. SRC comments on August 2008 Fatality Monitoring Report, M21. SRC document P107, County of Alameda, Hayward, California.

O4B-140
(Cont.)

Smallwood, K. S. 2008. Burrowing owl carcass distribution around wind turbines. SRC document P106, County of Alameda, Hayward, California.

Smallwood, K. S. 2008. Assessment of relocation/removal of Altamont Pass wind turbines rated as hazardous by the Alameda County SRC. SRC document P103, County of Alameda, Hayward, California.

Smallwood, K. S. and L. Neher. 2008. Summary of wind turbine-free ridgelines within and around the APWRA. SRC document P102, County of Alameda, Hayward, California.

Smallwood, K. S. and B. Karas. 2008. Comparison of mortality estimates in the Altamont Pass Wind Resource Area when restricted to recent fatalities. SRC document P101, County of Alameda, Hayward, California.

Smallwood, K. S. 2008. On the misapplication of mortality adjustment terms to fatalities missed during one search and found later. SRC document P97, County of Alameda, Hayward, California.

Smallwood, K. S. 2008. Relative abundance of raptors outside the APWRA. SRC document P88, County of Alameda, Hayward, California.

Smallwood, K. S. 2008. Comparison of mortality estimates in the Altamont Pass Wind Resource Area. SRC document P76, County of Alameda, Hayward, California.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). 2010. Guidelines for siting wind turbines recommended for relocation to minimize potential collision-related mortality of four focal raptor species in the Altamont Pass Wind Resource Area. SRC document P70, County of Alameda, Hayward, California.

Alameda County SRC (J. Burger, Smallwood, K. S., S. Orloff, J. Estep, and J. Yee). 2007. First DRAFT of Hazardous Rating Scale First DRAFT of Hazardous Rating Scale. SRC document P69, County of Alameda, Hayward, California.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). December 11, 2007. SRC selection of dangerous wind turbines. Alameda County SRC document P-67. 8 pp.

Smallwood, S. October 6, 2007. Smallwood's answers to Audubon's queries about the SRC's recommended four-month winter shutdown of wind turbines in the Altamont Pass. Alameda County SRC document P-23.

Smallwood, K. S. October 1, 2007. Dissenting opinion on recommendation to approve of the AWI Blade Painting Study. Alameda County SRC document P-60.

Smallwood, K. S. July 26, 2007. Effects of monitoring duration and inter-annual variability on precision of wind-turbine caused mortality estimates in the Altamont Pass Wind Resource Area, California. SRC Document P44.

O4B-140
(Cont.)

Smallwood, K. S. July 26, 2007. Memo: Opinion of some SRC members that the period over which post-management mortality will be estimated remains undefined. SRC Document P43.

Smallwood, K. S. July 19, 2007. Smallwood's response to P24G. SRC Document P41, 4 pp.

Smallwood, K. S. April 23, 2007. New Information Regarding Alameda County SRC Decision of 11 April 2007 to Grant FPLE Credits for Removing and Relocating Wind Turbines in 2004. SRC Document P26.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, and J. Burger [J. Yee abstained]). April 17, 2007. SRC Statement in Support of the Monitoring Program Scope and Budget.

Smallwood, K. S. April 15, 2007. Verification of Tier 1 & 2 Wind Turbine Shutdowns and Relocations. SRC Document P22.

Smallwood, S. April 15, 2007. Progress of Avian Wildlife Protection Program & Schedule.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). April 3, 2007. Alameda County Scientific Review Committee replies to the parties' responses to its queries and to comments from the California Office of the Attorney General. SRC Document S20.

Smallwood, S. March 19, 2007. Estimated Effects of Full Winter Shutdown and Removal of Tier I & II Turbines. SRC Document S19.

Smallwood, S. March 8, 2007. Smallwood's Replies to the Parties' Responses to Queries from the SRC and Comments from the California Office of the Attorney General. SRC Document S16.

Smallwood, S. March 8, 2007. Estimated Effects of Proposed Measures to be Applied to 2,500 Wind Turbines in the APWRA Fatality Monitoring Plan. SRC Document S15.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). February 7, 2007. Analysis of Monitoring Program in Context of 1/1//2007 Settlement Agreement.

Smallwood, S. January 8, 2007. Smallwood's Concerns over the Agreement to Settle the CEQA Challenges. SRC Document S5.

Alameda County SRC (Smallwood, K. S., S. Orloff, J. Estep, J. Burger, and J. Yee). December 19, 2006. Altamont Scientific Review Committee (SRC) Recommendations to the County on the Avian Monitoring Team Consultants' Budget and Organization.

O4B-140
(Cont.)

Reports to Clients

Assessment of wildlife collision risk with fourth wind turbine layout of Sand Hill and Rooney Ranch Wind Farms. Report to Viracocha Wind, Bethesda Maryland, and Salka, San Diego, California. 2 pp.

Smallwood, K. S. 2025. Review of Identifying Critical Drivers of Western Snowy Plover Reproductive Success to Guide Management Toward Recovery Goals (Neuman et al. 2024). Report to Center for Biological Diversity.

Smallwood, K. S. 2024. Assessment of grading impacts on eagles at Viracocha Wind. Report to Viracocha Wind, Bethesda Maryland, and Salka, San Diego, California. 1 p.

Smallwood, K. S. 2023. Assessment of wildlife collision risk with third wind turbine layout of Sand Hill & Rooney Ranch Wind Farm. Report to Viracocha Wind, Bethesda Maryland, and Salka, San Diego, California.

Smallwood, K. S. and D. A. Bell. 2022. Ground squirrel abundance and repeat raptor surveys at Vasco Caves Regional Preserve, 2006–2019. Report to the East Contra Costa County Habitat Conservancy Science and Research Grant Program. 80 pp.

Smallwood, K. S. 2022c. Assessment of wildlife collision risk with second wind turbine layout of Sand Hill and Rooney Ranch Wind Farm. Report to Viracocha Wind LLC and Salka LLC.

Smallwood, K. S. 2022b. Assessment of wildlife collision risk with second wind turbine layout of Viracocha Wind Farm. Report to Viracocha Wind LLC and Salka LLC.

Smallwood, K. S. 2022. Survey for Burrow Systems of San Joaquin Kangaroo Rat (*Dipotomys nitratoides*) at Natural Resource Management Area 5, Naval Air Station, Lemoore. Report to U.S. Navy.

Smallwood, K. S. 2022a. Assessment of wildlife collision risk with initial wind turbine layout of Viracocha Wind Farm. Report to Viracocha Wind LLC and Salka LLC.

Smallwood, K. S. 2020. Baseline Map of California Ground Squirrel Burrow Systems on Marsh Creek Preserve. Report to East Bay Regional Park District, Oakland, California.

Smallwood, K. S. 2020. Comparison of bird and bat fatality rates among utility-scale solar projects in California. Report to undisclosed client.

Smallwood, K. S., D. Bell, and S. Standish. 2018. Skilled dog detections of bat and small bird carcasses in wind turbine fatality monitoring. Report to East Bay Regional Park District, Oakland, California.

Smallwood, K. S. 2018. Addendum to Comparison of Wind Turbine Collision Hazard Model Performance: One-year Post-construction Assessment of Golden Eagle Fatalities

O4B-140
(Cont.)

at Golden Hills. Report to Audubon Society, NextEra Energy, and the California Attorney General.

Smallwood, K. S., and L. Neher. 2018. Siting wind turbines to minimize raptor collisions at Sand Hill Repowering Project, Altamont Pass Wind Resource Area. Report to S-Power, Salt Lake City, Utah.

Smallwood, K. S., and L. Neher. 2018. Siting wind turbines to minimize raptor collisions at Rooney Ranch Repowering Project, Altamont Pass Wind Resource Area. Report to S-Power, Salt Lake City, Utah.

Smallwood, K. S. 2017. Summary of a burrowing owl conservation workshop. Report to Santa Clara Valley Habitat Agency, Morgan Hill, California.

Smallwood, K. S., and L. Neher. 2018. Comparison of wind turbine collision hazard model performance prepared for repowering projects in the Altamont Pass Wind Resources Area. Report to NextEra Energy Resources, Inc., Office of the California Attorney General, Audubon Society, East Bay Regional Park District.

Smallwood, K. S., and L. Neher. 2016. Siting wind turbines to minimize raptor collisions at Summit Winds Repowering Project, Altamont Pass Wind Resource Area. Report to Salka, Inc., Washington, D.C.

Smallwood, K. S., L. Neher, and D. A. Bell. 2017. Mitigating golden eagle impacts from repowering Altamont Pass Wind Resource Area and expanding Los Vaqueros Reservoir. Report to East Contra Costa County Habitat Conservation Plan Conservancy and Contra Costa Water District.

Smallwood, K. S. 2016. Review of avian-solar science plan. Report to Center for Biological Diversity. 28 pp

Smallwood, K. S. 2016. Report of Altamont Pass research as Vasco Winds mitigation. Report to NextEra Energy Resources, Inc., Office of the California Attorney General, Audubon Society, East Bay Regional Park District.

Smallwood, K. S., and L. Neher. 2016. Siting Wind Turbines to Minimize Raptor collisions at Sand Hill Repowering Project, Altamont Pass Wind Resource Area. Report to Ogin, Inc., Waltham, Massachusetts.

Smallwood, K. S., and L. Neher. 2015a. Siting wind turbines to minimize raptor collisions at Golden Hills Repowering Project, Altamont Pass Wind Resource Area. Report to NextEra Energy Resources, Livermore, California.

Smallwood, K. S., and L. Neher. 2015b. Siting wind turbines to minimize raptor collisions at Golden Hills North Repowering Project, Altamont Pass Wind Resource Area. Report to NextEra Energy Resources, Livermore, California.

O4B-140
(Cont.)

Smallwood, K. S., and L. Neher. 2015c. Siting wind turbines to minimize raptor collisions at the Patterson Pass Repowering Project, Altamont Pass Wind Resource Area. Report to EDF Renewable Energy, Oakland, California.

Smallwood, K. S., and L. Neher. 2014. Early assessment of wind turbine layout in Summit Wind Project. Report to Altamont Winds LLC, Tracy, California.

Smallwood, K. S. 2015. Review of avian use survey report for the Longboat Solar Project. Report to EDF Renewable Energy, Oakland, California.

Smallwood, K. S. 2014. Information needed for solar project impacts assessment and mitigation planning. Report to Panorama Environmental, Inc., San Francisco, California.

Smallwood, K. S. 2014. Monitoring fossorial mammals in Vasco Caves Regional Preserve, California: Report of Progress for the period 2006-2014. Report to East Bay Regional Park District, Oakland, California.

Smallwood, K. S. 2013. First-year estimates of bird and bat fatality rates at old wind turbines, Forebay areas of Altamont Pass Wind Resource Area. Report to FloDesign in support of EIR.

Smallwood, K. S. and W. Pearson. 2013. Neotropical bird monitoring of burrowing owls (*Athene cunicularia*), Naval Air Station Lemoore, California. Tierra Data, Inc. report to Naval Air Station Lemoore.

Smallwood, K. S. 2013. Winter surveys for San Joaquin kangaroo rat (*Dipodomys nitratoides*) and burrowing owls (*Athene cunicularia*) within Air Operations at Naval Air Station, Lemoore. Report to Tierra Data, Inc. and Naval Air Station Lemoore.

Smallwood, K. S. and M. L. Morrison. 2013. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) conservation research in Resource Management Area 5, Lemoore Naval Air Station: 2013 Final Report (Inclusive of work during 2000-2013). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California.

Smallwood, K. S. and M. L. Morrison. 2013. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) conservation research in Resource Management Area 5, Lemoore Naval Air Station: 2012 Progress Report (Inclusive of work during 2000-2012). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California.

Smallwood, K. S. 2012. Fatality rate estimates at the Vantage Wind Energy Project, year one. Report to Ventus Environmental, Portland, Oregon.

Smallwood, K. S. and L. Neher. 2012. Siting wind turbines to minimize raptor collisions at North Sky River. Report to NextEra Energy Resources, LLC.

O4B-140
(Cont.)

Smallwood, K. S. 2011. Monitoring Fossorial Mammals in Vasco Caves Regional Preserve, California: Report of Progress for the Period 2006-2011. Report to East Bay Regional Park District.

Smallwood, K. S. and M. L. Morrison. 2011. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2011 Progress Report (Inclusive of work during 2000-2011). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California.

Smallwood, K. S. 2011. Draft study design for testing collision risk of FloDesign Wind Turbine in Patterson Pass, Santa Clara, and Former AES Seawest Wind Projects in the Altamont Pass Wind Resource Area (APWRA). Report to FloDesign, Inc.

Smallwood, K. S. 2011. Comments on Marbled Murrelet collision model for the Radar Ridge Wind Resource Area. Report to EcoStat, Inc., and ultimately to US Fish and Wildlife Service.

Smallwood, K. S. 2011. Avian fatality rates at Buena Vista Wind Energy Project, 2008-2011. Report to Pattern Energy.

Smallwood, K. S. and L. Neher. 2011. Siting repowered wind turbines to minimize raptor collisions at Tres Vaqueros, Contra Costa County, California. Report to Pattern Energy.

Smallwood, K. S. and M. L. Morrison. 2011. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2010 Progress Report (Inclusive of work during 2000-2010). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California.

Smallwood, K. S. 2010. Wind Energy Development and avian issues in the Altamont Pass, California. Report to Black & Veatch.

Smallwood, K. S. and L. Neher. 2010. Siting repowered wind turbines to minimize raptor collisions at the Tres Vaqueros Wind Project, Contra Costa County, California. Report to the East Bay Regional Park District, Oakland, California.

Smallwood, K. S. and L. Neher. 2010. Siting repowered wind turbines to minimize raptor collisions at Vasco Winds. Report to NextEra Energy Resources, LLC, Livermore, California.

Smallwood, K. S. 2010. Baseline avian and bat fatality rates at the Tres Vaqueros Wind Project, Contra Costa County, California. Report to the East Bay Regional Park District, Oakland, California.

O4B-140
(Cont.)

Smallwood, K. S. and M. L. Morrison. 2010. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2009 Progress Report (Inclusive of work during 2000-2009). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California. 86 pp.

Smallwood, K. S. 2009. Mammal surveys at naval outlying landing field Imperial Beach, California, August 2009. Report to Tierra Data, Inc. 5 pp

Smallwood, K. S. 2009. Mammals and other Wildlife Observed at Proposed Site of Amargosa Solar Power Project, Spring 2009. Report to Tierra Data, Inc. 13 pp

Smallwood, K. S. 2009. Avian Fatality Rates at Buena Vista Wind Energy Project, 2008-2009. Report to members of the Contra Costa County Technical Advisory Committee on the Buena Vista Wind Energy Project. 8 pp.

Smallwood, K. S. 2009. Repowering the Altamont Pass Wind Resource Area more than Doubles Energy Generation While Substantially Reducing Bird Fatalities. Report prepared on behalf of Californians for Renewable Energy. 2 pp.

Smallwood, K. S. and M. L. Morrison. 2009. Surveys to Detect Salt Marsh Harvest Mouse and California Black Rail at Installation Restoration Site 30, Military Ocean Terminal Concord, California: March-April 2009. Report to Insight Environmental, Engineering, and Construction, Inc., Sacramento, California. 6 pp.

Smallwood, K. S. 2008. Avian and Bat Mortality at the Big Horn Wind Energy Project, Klickitat County, Washington. Unpublished report to Friends of Skamania County. 7 pp.

Smallwood, K. S. 2009. Monitoring Fossorial Mammals in Vasco Caves Regional Preserve, California: report of progress for the period 2006-2008. Unpublished report to East Bay Regional Park District. 5 pp.

Smallwood, K. S. and M. L. Morrison. 2008. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2008 Progress Report (Inclusive of work during 2000-2008). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California. 84 pp.

Smallwood, K. S. and M. L. Morrison. 2008. Habitat Assessment for California Red-Legged Frog at Naval Weapons Station, Seal Beach, Detachment Concord, California. Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California. 48 pp.

Smallwood, K. S. and B. Nakamoto. 2008. Impact of 2005 and 2006 West Nile Virus on Yellow-billed Magpie and American Crow in the Sacramento Valley, California. 22 pp.

O4B-140 (Cont.)

Smallwood, K. S. and M. L. Morrison. 2008. Former Naval Security Group Activity (NSGA), Skaggs Island, Waste and Contaminated Soil Removal Project (IR Site #2), San Pablo Bay, Sonoma County, California: Re-Vegetation Monitoring. Report to U.S. Navy, Letter Agreement – N68711-04LT-A0045. Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California. 10 pp.

Smallwood, K. S. and M. L. Morrison. 2008. Burrowing owls at Dixon Naval Radio Transmitter Facility. Report to U.S. Navy. Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California. 28 pp.

Smallwood, K. S. and M. L. Morrison. 2008. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2007 Progress Report (Inclusive of work during 2001-2007). Naval Facilities Engineering Command, Southwest, Desert Integrated Products Team, San Diego, California. 69 pp.

Smallwood, K. S. and M. L. Morrison. 2007. A Monitoring Effort to Detect the Presence of the Federally Listed Species California Clapper Rail and Salt Marsh Harvest Mouse, and Wetland Habitat Assessment at the Naval Weapons Station, Seal Beach, Detachment Concord, California. Installation Restoration (IR) Site 30, Final Report to U.S. Navy, Letter Agreement – N68711-05LT-A0001. U.S. Navy Integrated Product Team (IPT), West, Naval Facilities Engineering Command, San Diego, California. 8 pp.

Smallwood, K. S. and M. L. Morrison. 2007. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2006 Progress Report (Inclusive of work during 2001-2006). U.S. Navy Integrated Product Team (IPT), West, Naval Facilities Engineering Command, Southwest, Daly City, California. 165 pp.

Smallwood, K. S. and C. Thelander. 2006. Response to third review of Smallwood and Thelander (2004). Report to California Institute for Energy and Environment, University of California, Oakland, CA. 139 pp.

Smallwood, K. S. 2006. Biological effects of repowering a portion of the Altamont Pass Wind Resource Area, California: The Diablo Winds Energy Project. Report to Altamont Working Group. Available from Shawn Smallwood, puma@yolo.com . 34 pp.

Smallwood, K. S. 2006. Impact of 2005 West Nile Virus on yellow-billed magpie and american crow in the Sacramento Valley, California. Report to Sacramento-Yolo Mosquito and Vector Control District, Elk Grove, CA. 38 pp.

Smallwood, K. S. and M. L. Morrison. 2006. San Joaquin kangaroo rat (*Dipodomys n. nitratoides*) Conservation Research in Resource Management Area 5, Lemoore Naval Air Station: 2005 Progress Report (Inclusive of work during 2001-2005). U.S. Navy Integrated Product Team (IPT), West, Naval Facilities Engineering Command, South West, Daly City, California. 160 pp.

O4B-140
(Cont.)

Smallwood, K. S. and M. L. Morrison. 2006. A monitoring effort to detect the presence of the federally listed species California tiger salamander and California red-legged frog at the Naval Weapons Station, Seal Beach, Detachment Concord, California. Letter agreements N68711-04LT-A0042 and N68711-04LT-A0044, U.S. Navy Integrated Product Team (IPT), West, Naval Facilities Engineering Command, South West, Daly City, California. 60 pp.

Smallwood, K. S. and M. L. Morrison. 2006. A monitoring effort to detect the presence of the federally listed species California Clapper Rail and Salt Marsh Harvest Mouse, and wetland habitat assessment at the Naval Weapons Station, Seal Beach, Detachment Concord, California. Sampling for rails, Spring 2006, Installation Restoration (IR) Site 1. Letter Agreement – N68711-05lt-A0001, U.S. Navy Integrated Product Team (IPT), West, Naval Facilities Engineering Command, South West, Daly City, California. 9 pp.

Morrison, M. L. and K. S. Smallwood. 2006. Final Report: Station-wide Wildlife Survey, Naval Air Station, Lemoore. Department of the Navy Integrated Product Team (IPT) West, Naval Facilities Engineering Command Southwest, 2001 Junipero Serra Blvd., Suite 600, Daly City, CA 94014-1976. 20 pp.

Smallwood, K. S. and M. L. Morrison. 2006. Former Naval Security Group Activity (NSGA), Skaggs Island, Waste and Contaminated Soil Removal Project, San Pablo Bay, Sonoma County, California: Re-vegetation Monitoring. Department of the Navy Integrated Product Team (IPT) West, Naval Facilities Engineering Command Southwest, 2001 Junipero Serra Blvd., Suite 600, Daly City, CA 94014-1976. 8 pp.

Dorin, Melinda, Linda Spiegel and K. Shawn Smallwood. 2005. Response to public comments on the staff report entitled *Assessment of Avian Mortality from Collisions and Electrocutions* (CEC-700-2005-015) (Avian White Paper) written in support of the 2005 Environmental Performance Report and the 2005 Integrated Energy Policy Report. California Energy Commission, Sacramento. 205 pp.

Smallwood, K. S. 2005. Estimating combined effects of selective turbine removal and winter-time shutdown of half the wind turbines. Unpublished CEC staff report, June 23. 1 p.

Erickson, W. and S. Smallwood. 2005. Avian and Bat Monitoring Plan for the Buena Vista Wind Energy Project Contra Costa County, California. Unpubl. report to Contra Costa County, Antioch, California. 22 pp.

Lamphier-Gregory, West Inc., Shawn Smallwood, Jones & Stokes Associates, Illingworth & Rodkin Inc. and Environmental Vision. 2005. Environmental Impact Report for the Buena Vista Wind Energy Project, LP# 022005. County of Contra Costa Community Development Department, Martinez, California.

Morrison, M. L. and K. S. Smallwood. 2005. A monitoring effort to detect the presence of the federally listed species California clapper rail and salt marsh harvest mouse, and wetland habitat assessment at the Naval Weapons Station, Seal Beach, Detachment

O4B-140
(Cont.)

Concord, California. Targeted Sampling for Salt Marsh Harvest Mouse, Fall 2005 Installation Restoration (IR) Site 30. Letter Agreement – N68711-05lt-A0001, U.S. Department of the Navy, Naval Facilities Engineering Command Southwest, Daly City, California. 6 pp.

Morrison, M. L. and K. S. Smallwood. 2005. A monitoring effort to detect the presence of the federally listed species California clapper rail and salt marsh harvest mouse, and wetland habitat assessment at the Naval Weapons Station, Seal Beach, Detachment Concord, California. Letter Agreement – N68711-05lt-A0001, U.S. Department of the Navy, Naval Facilities Engineering Command Southwest, Daly City, California. 5 pp.

Morrison, M. L. and K. S. Smallwood. 2005. Skaggs Island waste and contaminated soil removal projects, San Pablo Bay, Sonoma County, California. Report to the U.S. Department of the Navy, Naval Facilities Engineering Command Southwest, Daly City, California. 6 pp.

Smallwood, K. S. and M. L. Morrison. 2004. 2004 Progress Report: San Joaquin kangaroo rat (*Dipodomys nitratoides*) Conservation Research in Resources Management Area 5, Lemoore Naval Air Station. Progress report to U.S. Department of the Navy, Lemoore, California. 134 pp.

Smallwood, K. S. and L. Spiegel. 2005a. Assessment to support an adaptive management plan for the APWRA. Unpublished CEC staff report, January 19. 19 pp.

Smallwood, K. S. and L. Spiegel. 2005b. Partial re-assessment of an adaptive management plan for the APWRA. Unpublished CEC staff report, March 25. 48 pp.

Smallwood, K. S. and L. Spiegel. 2005c. Combining biology-based and policy-based tiers of priority for determining wind turbine relocation/shutdown to reduce bird fatalities in the APWRA. Unpublished CEC staff report, June 1. 9 pp.

Smallwood, K. S. 2004. Alternative plan to implement mitigation measures in APWRA. Unpublished CEC staff report, January 19. 8 pp.

Smallwood, K. S., and L. Neher. 2005. Repowering the APWRA: Forecasting and minimizing avian mortality without significant loss of power generation. California Energy Commission, PIER Energy-Related Environmental Research. CEC-500-2005-005. 21 pp. [Reprinted (in Japanese) in Yukihiro Kominami, Tatsuya Ura, Koshitawa, and Tsuchiya, Editors, Wildlife and Wind Turbine Report 5. Wild Bird Society of Japan, Tokyo.]

Morrison, M. L., and K. S. Smallwood. 2004. Kangaroo rat survey at RMA4, NAS Lemoore. Report to U.S. Navy. 4 pp.

Morrison, M. L., and K. S. Smallwood. 2004. A monitoring effort to detect the presence of the federally listed species California clapper rails and wetland habitat assessment at

O4B-140
(Cont.)

Pier 4 of the Naval Weapons Station, Seal Beach, Detachment Concord, California. Letter Agreement N68711-04LT-A0002. 8 pp. + 2 pp. of photo plates.

Smallwood, K. S. and M. L. Morrison. 2003. 2003 Progress Report: San Joaquin kangaroo rat (*Dipodomys nitratoides*) Conservation Research at Resources Management Area 5, Lemoore Naval Air Station. Progress report to U.S. Department of the Navy, Lemoore, California. 56 pp. + 58 figures.

Smallwood, K. S. 2003. Comparison of Biological Impacts of the No Project and Partial Underground Alternatives presented in the Final Environmental Impact Report for the Jefferson-Martin 230 kV Transmission Line. Report to California Public Utilities Commission. 20 pp.

Morrison, M. L., and K. S. Smallwood. 2003. Kangaroo rat survey at RMA4, NAS Lemoore. Report to U.S. Navy. 6 pp. + 7 photos + 1 map.

Smallwood, K. S. 2003. Assessment of the Environmental Review Documents Prepared for the Tesla Power Project. Report to the California Energy Commission on behalf of Californians for Renewable Energy. 32 pp.

Smallwood, K. S., and M. L. Morrison. 2003. 2002 Progress Report: San Joaquin kangaroo rat (*Dipodomys nitratoides*) Conservation Research at Resources Management Area 5, Lemoore Naval Air Station. Progress report to U.S. Department of the Navy, Lemoore, California. 45 pp. + 36 figures.

Smallwood, K. S., Michael L. Morrison and Carl G. Thelander 2002. Study plan to test the effectiveness of aerial markers at reducing avian mortality due to collisions with transmission lines: A report to Pacific Gas & Electric Company. 10 pp.

Smallwood, K. S. 2002. Assessment of the Environmental Review Documents Prepared for the East Altamont Energy Center. Report to the California Energy Commission on behalf of Californians for Renewable Energy. 26 pp.

Thelander, Carl G., K. Shawn Smallwood, and Christopher Costello. 2002 Rating Distribution Poles for Threat of Raptor Electrocution and Priority Retrofit: Developing a Predictive Model. Report to Southern California Edison Company. 30 pp.

Smallwood, K. S., M. Robison, and C. Thelander. 2002. Draft Natural Environment Study, Prunedale Highway 101 Project. California Department of Transportation, San Luis Obispo, California. 120 pp.

Smallwood, K.S. 2001. Assessment of ecological integrity and restoration potential of Beeman/Pelican Farm. Draft Report to Howard Beeman, Woodland, California. 14 pp.

Smallwood, K. S., and M. L. Morrison. 2002. Fresno kangaroo rat (*Dipodomys nitratoides*) Conservation Research at Resources Management Area 5, Lemoore Naval

O4B-140 (Cont.)

Air Station. Progress report to U.S. Department of the Navy, Lemoore, California. 29 pp. + 19 figures.

Smallwood, K.S. 2001. Rocky Flats visit, April 4th through 6th, 2001. Report to Berger & Montaque, P.C. 16 pp. with 61 color plates.

Smallwood, K.S. 2001. Affidavit of K. Shawn Smallwood, Ph.D. in the matter of the U.S. Fish and Wildlife Service's rejection of Seatuck Environmental Association's proposal to operate an education center on Seatuck National Wildlife Refuge. Submitted to Seatuck Environmental Association in two parts, totaling 7 pp.

Magney, D., and K.S. Smallwood. 2001. Maranatha High School CEQA critique. Comment letter submitted to Tamara & Efren Compeán, 16 pp.

Smallwood, K. S. and D. Magney. 2001. Comments on the Newhall Ranch November 2000 Administrative Draft EIR. Prepared for Ventura County Counsel regarding the Newhall Ranch Specific Plan EIR. 68 pp.

Magney, D. and K. S. Smallwood. 2000. Newhall Ranch Notice of Preparation Submittal. Prepared for Ventura County Counsel regarding our recommended scope of work for the Newhall Ranch Specific Plan EIR. 17 pp.

Smallwood, K. S. 2000. Comments on the Preliminary Staff Assessment of the Contra Costa Power Plant Unit 8 Project. Submitted to California Energy Commission on November 30 on behalf of Californians for Renewable Energy (CaRE). 4 pp.

Smallwood, K. S. 2000. Comments on the California Energy Commission's Final Staff Assessment of the MEC. Submitted to California Energy Commission on October 29 on behalf of Californians for Renewable Energy (CaRE). 8 pp.

Smallwood, K. S. 2000. Comments on the Biological Resources Mitigation Implementation and Monitoring Plan (BRMIMP). Submitted to California Energy Commission on October 29 on behalf of Californians for Renewable Energy (CaRE). 9 pp.

Smallwood, K. S. 2000. Comments on the Preliminary Staff Assessment of the Metcalf Energy Center. Submitted to California Energy Commission on behalf of Californians for Renewable Energy (CaRE). 11 pp.

Smallwood, K. S. 2000. Preliminary report of reconnaissance surveys near the TRW plant south of Phoenix, Arizona, March 27-29. Report prepared for Hagens, Berman & Mitchell, Attorneys at Law, Phoenix, AZ. 6 pp.

Morrison, M. L., K. S. Smallwood, and M. Robison. 2001. Draft Natural Environment Study for Highway 46 compliance with CEQA/NEPA. Report to the California Department of Transportation. 75 pp.

O4B-140
(Cont.)

Morrison, M.L., and K.S. Smallwood. 1999. NTI plan evaluation and comments. Exhibit C in W.D. Carrier, M.L. Morrison, K.S. Smallwood, and Vail Engineering. Recommendations for NBHCP land acquisition and enhancement strategies. Northern Territories, Inc., Sacramento.

Smallwood, K. S. 1999. Estimation of impacts due to dredging of a shipping channel through Humboldt Bay, California. Court Declaration prepared on behalf of EPIC.

Smallwood, K. S. 1998. 1998 California mountain lion track count. Report to the Defenders of Wildlife, Washington, D.C. 5 pages.

Smallwood, K.S. 1998. Draft report of a visit to a paint sludge dump site near Ridgewood, New Jersey, February 26th, 1998. Unpublished report to Consulting in the Public Interest.

Smallwood, K.S. 1997. Science missing in the “no surprises” policy. Commissioned by National Endangered Species Network and Spirit of the Sage Council, Pasadena, California.

Smallwood, K.S. and M.L. Morrison. 1997. Alternate mitigation strategy for incidental take of giant garter snake and Swainson’s hawk as part of the Natomas Basin Habitat Conservation Plan. Pages 6-9 and *iii* illustrations in W.D. Carrier, K.S. Smallwood and M.L. Morrison, Natomas Basin Habitat Conservation Plan: Narrow channel marsh alternative wetland mitigation. Northern Territories, Inc., Sacramento.

Smallwood, K.S. 1996. Assessment of the BIOPORT model's parameter values for pocket gopher burrowing characteristics. Report to Berger & Montague, P.C. and Roy S. Haber, P.C., Philadelphia. (peer reviewed).

Smallwood, K.S. 1997. Assessment of plutonium releases from Hanford buried waste sites. Report Number 9, Consulting in the Public Interest, 53 Clinton Street, Lambertville, New Jersey, 08530.

Smallwood, K.S. 1996. Soil Bioturbation and Wind Affect Fate of Hazardous Materials that were Released at the Rocky Flats Plant, Colorado. Report to Berger & Montague, P.C., Philadelphia.

Smallwood, K.S. 1996. Second assessment of the BIOPORT model's parameter values for pocket gopher burrowing characteristics and other relevant wildlife observations. Report to Berger & Montague, P.C. and Roy S. Haber, P.C., Philadelphia.

Smallwood, K.S., and R. Leidy. 1996. Wildlife and their management under the Martell SYP. Report to Georgia Pacific, Corporation, Martel, CA. 30 pp.

EIP Associates. 1995. Yolo County Habitat Conservation Plan Biological Resources Report. Yolo County Planning and Development Department, Woodland, California.

O4B-140 (Cont.)

Smallwood, K.S. and S. Geng. 1995. Analysis of the 1987 California Farm Cost Survey and recommendations for future survey. Program on Workable Energy Regulation, University-wide Energy Research Group, University of California.

Smallwood, K.S., S. Geng, and W. Idzerda. 1992. Final report to PG&E: Analysis of the 1987 California Farm Cost Survey and recommendations for future survey. Pacific Gas & Electric Company, San Ramon, California. 24 pp.

Fitzhugh, E.L. and K.S. Smallwood. 1987. Methods Manual – A statewide mountain lion population index technique. California Department of Fish and Game, Sacramento.

Salmon, T.P. and K.S. Smallwood. 1989. Final Report – Evaluating exotic vertebrates as pests to California agriculture. California Department of Food and Agriculture, Sacramento.

Smallwood, K.S. and W. A. Erickson (written under supervision of W.E. Howard, R.E. Marsh, and R.J. Laacke). 1990. Environmental exposure and fate of multi-kill strychnine gopher baits. Final Report to USDA Forest Service –NAPIAP, Cooperative Agreement PSW-89-0010CA.

Fitzhugh, E.L., K.S. Smallwood, and R. Gross. 1985. Mountain lion track count, Marin County, 1985. Report on file at Wildlife Extension, University of California, Davis.

Written Expert Testimony on Environmental Documents (Year; pages)

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I was retained or commissioned to comment on environmental planning and review documents, including:

- Delano Pre-zoning Application No. 25-0002 Staff Report, City of Delano (2026; 20);
- PCUP24-017 Kinder Morgan Ontario Terminal Tank OT-4, Ontario International Airport (2026; 7);
- Del Puerto Canyon Reservoir PRDEIR, Del Puerto Water District (2026; 37);
- Replies to responses to comments on Bridgehead Industrial Project DEIR, City of Oakley (2026; 49);
- Pacific Palmdale DEIR, Palmdale (2026; 50);
- Village Farms Project FEIR, Davis (2026; 17);
- Village Farms Project DEIR, Davis (2025; 19);
- PS Solar Project DEIR, Twentynine Palms (2026; 52);
- Baker Street Warehouse Project DEIR, Lake Elsinore (2026; 55);
- Dexter Village IS/MND, Lake Elsinore (2026 ; 52);
- 83 Princess Street, California Design Review, City of Sausalito (2026; 39);
- Replies to responses to comments on Bridgehead Industrial Project DEIR, City of Oakley (2026; 49);
- Delta Conveyance Project Incidental Take Permit, California Department of Water Resources (2025; 37);

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- Tri Pointe Homes Staff Report, City of Banning (2025; 38);
- Replies to responses to comments on Locust Gateway Development Project DEIR, City of Rialto (2025; 30);
- Meredith International Centre Specific Plan Amendment – Planning Area 3 Project FEIR Addendum, City of Ontario (2025; 44);
- Pepper 210 Commerce Center Project IS/MND, City of Rialto (2025; 35);
- Pacific Gateway Specific Plan Project DEIR, San Joaquin County (2025; 57);
- Lake Creek Logistics Center DEIR, City of Apple Valley (2025; 49);
- Replies to responses to comments on E&P Technology Way - Building A & B IS/MND, County of Napa (2025; 56);
- Menifee 27 Residential Staff Report (2025; 46);
- Shingle Springs Band of Miwok Indians 295.7-Acre Fee-to-Trust Project Environmental Assessment (2025; 17);
- Catavina Residential Project IS/MND, Palm Desert (2025; 52);
- Menifee Business Park DEIR (2025; 43);
- Replies to responses to comments on Ophir Road Warehouse Project DEIR, Oroville (2025; 19);
- Thermal Ranch Specific Plan DEIR, County of Riverside (2025; 53);
- Camino Pablo Single-Family Residential Subdivision IS/MND, Morgan Hill (2025; 44);
- Adesa Foods Project IS/MND, City of Rialto (2025; 34);
- Entrada South and Valencia Commerce Center SEIR, County of Los Angeles (2025; 61);
- Malibu Vineyards Industrial Parkway Project DREIR, City of Bakersfield (2025; 37);
- Locust Gateway Development Project DEIR, City of Rialto (2025; 41);
- FSRE Industrial Concord Project DEIR, City of Concord (2025; 34);
- Bridgehead Industrial Project DEIR, City of Oakley (2025; 40);
- San Francisco Housing Element 2022 Update FEIR Addendum (2025; 22);
- Trails at Lyons Canyon DEIR, County of Los Angeles (2025; 55);
- Replies to responses to comments on Conejo Summit Project DEIR, Thousand Oaks (2025; 30);
- Replies to responses to comments on Rome Hill Commercial IS/MND, City of Lake Elsinore (2025; 16);
- Rome Hill Commercial IS/MND, City of Lake Elsinore (2025; 34);
- Replies to responses to comments on Town & Country Village Project DEIR, County of El Dorado (2025; 46);
- Arroyo Vista Project DEIR. County of Riverside (2025; 46);
- Rubio Village Mixed-Use Project IS/MND, City of San Gabriel (2025; 64);
- Replies to responses to comments on Bickmore Warehouse IS/MND, Hesperia (2025; 4);
- Vesting Tentative Tract Map 7500 Staff Report, City of Bakersfield (2025; 10);
- Spirit Living at 55 Thomas Dr/70 Knoll Rd Design Plans, Tiburon (2025; 39);

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- Cargo Solutions Truck Warehouse and Truck Stop Hesperia Project IS/MND (2025; 40);
- Fontana Master Case No. 23-0101, Conditional Use Permit No. 24-0022, and Design Review No. 23-0024 Class-32 CEQA Categorical Exemption, City of Fontana (2025; 32);
- Vesting Tentative Tract Map 7471 IS/MND, City of Bakersfield (2025; 46);
- Replies to responses to comments on Upper Westside Specific Plan DEIR, County of Sacramento (2025; 56);
- Upper Westside Specific Plan DEIR, County of Sacramento (2025; 63);
- Flat Creek Solar Project Major Renewable Energy Facility Siting Permit pursuant to Article VIII of the New York State Public Service Law, Towns of Root and Canajoharie, Montgomery County, New York (2025; 37);
- Replies to responses to comments on Dogwood Geothermal Energy Project DEIR, Imperial County (2025; 22);
- Wineville Development Project DEIR, Jurupa Valley (2025; 43);
- Desert Business Park MSD Addendum, County of Riverside (2025; 29);
- Chino Gateway Terminal Project DEIR Addendum, Chino (2025; 39);
- Mesa Verde Specific Plan DSEIR, City of Calimesa (2025; 53);
- Harvest Landing Retail Center & Business Park DEIR, City of Perris (2025; 40);
- Hive Live Project DEIR, Costa Mesa (2025; 37);
- Perris Airport Logistics Center DEIR, Perris (2025; 41);
- Vehicle-Caused Mortality of Western Snowy Plovers On Oceano Dunes State Vehicular Recreation Area (2025; 17);
- Dakota Warehouse Project IS/MND, Apple Valley (2025; 36);
- Delta Conveyance Project FEIR, CDFW ITP, California Department of Water Resources (2025; 45);
- Oceanside Transit Center EIR, Oceanside (2025; 41);
- Auburn Development, Ecosave III (LDP 23-02) IS/MND, Adelanto (2025; 39);
- Replies to responses to comments on Dogwood Geothermal and Solar DEIR, Imperial County (2025; 22);
- Pinyon Solar Project EA, BLM, Phoenix (2025; 63);
- Armorlite Lofts Project DEIR/FEIR, San Marcos (2025; 47);
- Ophir Road Warehouse Project DEIR, Oroville (2025; 47);
- Intex Corporate Office and Fulfillment Center Project, Long Beach (2025; 35);
- Sywest Industrial Building FEIR, Goleta (2025; 42);
- Vista Santa Domingo Warehouse Project rezone, Otay Mesa (2025; 28);
- Replies to responses to comments on Airport South Industrial Park and City Annexation DEIR, Sacramento (2025; 33);
- Flat Creek Solar Project 94-c Permit for Major Renewable Energy Facility, Montgomery County, New York (2025; 29);
- Bickmore Warehouse IS/MND, Hesperia (2025; 25);
- Replies to responses to comments on Brew Enterprises Warehouse, Perris (2025; 41);

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- Nexus Hotel IS.MND, Palm Springs (2025; 33);
- Ranegras Plains Energy Center Project DEIS, Arizona (2025; 58);
- Riverside County General Plan Amendment for 350,000+ sf warehouse (2025; 31);
- Riverside County General Plan Amendment for 224,800 sf warehouse (2025; 29);
- Hageman Industrial Park DEIR, Bakersfield (2025; 42);
- Adelanto Warehouse CEQA Exemption (2025; 25);
- Tire Recycling Facility IS/MND, Adelanto (2025; 29);
- Replies to responses to comments on Sites Reservoir Application to California Water Board (2025; 41);
- Bakersfield General Plan Amendment/Zone Change No. 24-0372, Bakersfield (2025; 29);
- The Pointe Apartments CEQA Exemption, Oxnard (2025; 37);
- Mill Point Solar I Article VIII Permit for Major Renewable Energy Facility, Montgomery County, New York (2025; 36);
- Conejo Summit Project DEIR, Thousand Oaks (2025; 45);
- Replies to responses to comments on March Plaza IS/MND, Perris (2025; 5);
- March Plaza IS/MND, Perris (2024; 32);
- Replies to responses to comments on Arcadia Town Center IS/MND, Arcadia (2025; 3);
- Arcadia Town Center IS/MND, Arcadia (2024; 33);
- Westlanc Partners Hotel Project IS/MND, Lancaster (2025; 44);
- Temecula Resort and Spa Class 32 Exemption, Temecula (2025; 34);
- Briones Regional Park Staff Report, East Bay Regional Park District (2024; 63);
- Declaration regarding Havana Warehouse, Riverside County (2024; 6);
- 11623 Glenoaks Blvd (no CEQA review), City of Los Angeles (2024; 28);
- Five Point Community Offices SSEIR, Irvine (2024; 23);
- Replies to responses to comments on ENV-2022-6190-CE Categorical Exemption - Class 32, City of Los Angeles (2024; 17);
- ENV-2022-6190-CE Categorical Exemption - Class 32, City of Los Angeles (2024; 2);
- 380 North First Street DEIR, San Jose (2024; 21);
- Site Plan Review 23-014 IS/MND, Lancaster (2024; 29);
- Big Ranch Road Annexation Exemption, City of Napa (2024; 43);
- E&P Technology Way - Building A & B IS/MND, County of Napa (2024; 30);
- Outlaw Battery Energy Storage Project IS/MND, Kings County (2024; 26);
- Replies to responses to comments on Hills Preserve Project DEIR, Anaheim (2024; 57), and update (2024; 4);
- Replies to responses to comments on Tennessee Village Mixed-Use Project IS/MND, Redlands (2024; 26);
- Glen Annie Site (#11) in the Housing Element Update, County of Santa Barbara (2024; 61);
- Quail Meadows Apartments CEQA Exemption, Encinitas (2024; 61);
- Dogwood Geothermal and Solar DEIR, Imperial County (2024; 60);

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- Hills Preserve Project DEIR, Anaheim (2024; 57), and update (2024; 14);
- Temescal Commercial Project EA/IS, County of Riverside (2024; 36);
- 11011 Torreyana Road Project SMND, Torrey Pines (2024; 42);
- Rosemount Storage Project IS/MND, Cathedral City (2024; 9);
- Town & Country Village Project DEIR, El Dorado County (2024; 40);
- Maruchan Expansion Project EIR Addendum, Irvine (2024; 30);
- American River One Project CEQA Exemption, Sacramento (2024; 35);
- Spruce & Red Oak Apartments Project Notice of Exemption Supplement Information, Rancho Cucamonga (2024; 38);
- SDG Commerce 220 Distribution Center DEIR, American Canyon (2024; 39);
- Simi Pak Industrial Project IS/MND, Simi Valley (2024; 33);
- Replies to responses to comments on 4th & Hewitt Project DEIR, Los Angeles (2024; 5);
- Replies to responses to comments on Hardt and Brier Business Park IS/MND, San Bernardino (2024;
- Riverview Development Project IS/MND, Santa Clarita (2024; 37);
- Replies to responses to comments on 1360 N. Vine Street Project DEIR, Los Angeles (2024; 5);
- 1360 N. Vine Street Project DEIR, Los Angeles (2024; 29);
- Sites Reservoir Application to California Water Board (2024; 43);
- 022-221-100 Corona Drive, Pacifica (2024: 26);
- Airport South Industrial Park and City Annexation DEIR, Sacramento (2024; 53);
- Early Times Cell Tower at 12415 Fig Road IS/MND, County of Sacramento (2024; 29);
- University Community Plan, San Diego (2024; 10);
- 2720 S Willow Industrial Project IS/MND, Rialto (2024; 31);
- Elisabeth Solar Energy Project EA, Yuma Arizona (2024; 75);
- Jove Solar Energy Project DEIS, Yuma Arizona (2024; 103);
- Tennessee Village Project IS/MND, Redlands (2024; 43);
- Declaration on Whistling Ridge Energy Project Site Certification Agreement, Washington Energy Facility Site Evaluation Council (2024; 30);
- Replies to responses to comments on Dynamo Solar IS/MND, Napa (2024; 11);
- Dynamo Solar IS/MND, Napa (2024; 37);
- Shirk & Riggin Industrial Park DEIR, Visalia (2024; 37);
- Replies to responses to comments on Cal 98 Holdings IS/MND, Imperial County (2024; 10);
- Cal 98 Holdings IS/MND, Imperial County (2024; 39);
- 2nd Replies to responses to comments on Amazing 34 Distribution Center IS/MND, San Bernardino (2024; 28);
- Western States Solar Plan DPEIS, Washington D.C. (2024; 66);
- Patterson Business Center IS/MND, Perris (2024; 30);
- Replies to responses to comments on Sunset and Everett Project SCEA, Los Angeles (2024; 24);

- Sunset and Everett Project SCEA, Los Angeles (2024; 33);
- 605-613 Bridgeway, Sausalito (2024; 28);
- PBP Industrial Project IS/MND, Palmdale (2024; 35);
- Replies to responses to comments on Lockwood III Apartments IS/MND, Oxnard (2024; 19);
- Lockwood III Apartments IS/MND, Oxnard (2024; 42);
- 1169 8th Ave. Mixed-use Development City Posting, San Diego (2024; 16);
- 2nd Brew Enterprises Warehouse IS/MND, Perris (2024; 39);
- Replies to responses to comments on Hughes SMCC Industrial Project DEIR, San Marcos (2024; 5);
- Hughes SMCC Industrial Project DEIR, San Marcos (2024; 44);
- Harvill and Water Warehouse IS/MND, County of Riverside (2024; 41);
- Brew Enterprises Warehouse IS/MND, Perris (2024; 34);
- Garden Street Hotel Staff Report, Santa Barbara (2024; 31);
- River Walk Specific Plan DEIR, Riverbank (2024; 72);
- Woodlake Holdings Industrial Park DEIR (2024; 34);
- 2nd Quail Meadows Apartments CEQA Exemption, Encinitas (2024; 60);
- Replies to responses to comments on One Hamilton Drive Affordable Housing DEIR, Mill Valley (2024; 29);
- Glen Annie Housing Element Update, County of Santa Barbara (2024; 53);
- Replies to responses to comments on 4260 Arch North Drive Class 32 Categorical Exemption, Los Angeles (2023; 10);
- 4260 Arch North Drive Class 32 Categorical Exemption, Los Angeles (2023; 27);
- 2nd Replies to responses to comments on Rubio Village IS/MND, San Gabriel (2023; 17);
- West Foothill Development IS/MND, Upland (2023; 9);
- Costco Camarillo IS/MND (2024; 37);
- Shiloh Business Park General Plan Consistency Checklist, Windsor (2023; 25);
- Assembly and Light Industrial Building IS/MND, Grand Terrace (2024; 33);
- SMP 38, SMP 39. SMP 40 DEIR, Livermore (2023; 41);
- Summit Ridge Wind Farm second visit, The Dalles (2024; 43);
- Summit Ridge Wind Farm first visit, The Dalles (2023; 31);
- 3601 E. Mission Class 32 Categorical Exemption, Los Angeles (2023; 31);
- [Redacted] Conservation Easement, Tennessee (2023; 55);
- Hardt and Brier Business Park IS/MND, San Bernardino (2023; 32);
- Sacramento Street CEQA Exemption, San Francisco (2023; 22);
- One Hamilton Drive Affordable Housing DEIR, Mill Valley (2023; 48);
- Elmore North Geothermal site visit, Salton Sea (2023; 32);
- Morton Bay Geothermal site visit, Salton Sea (2023; 53);
- Black Rock Geothermal site visit, Salton Sea (2023; 29);
- Covelop Warehouse IS/MND, Paso Robles (2023; 39);
- Walnut Creek Flow Trail IS/MND (2023; 34);

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- Replies to responses to comments on Rubio Village IS/MND, San Gabriel (2023; 15);
- Ashley Warehouse Environmental Checklist, Lathrop (2023; 38);
- Replies on 6615 Pacific Coast Highway Site Plan Review, Long Beach (2023; 12)
- Science Research Park Expansion Project EIR Addendum, San Diego (2023; 40);
- Rubio Village IS/MND, San Gabriel (2023; 14);
- Havana Investment Industrial Categorical Exemption, Jurupa Valley (2023; 22);
- New Cal Centre EIR Addendum, Kern County (2023; 39);
- 4th & Hewitt Project DEIR, Los Angeles (2023; 19);
- 4260 N Arch Drive Categorical Exemption, Los Angeles (2023; 27);
- 6700 Pacific Coast Highway Site Plan Review, Long Beach (2023; 29);
- Replies to responses to comments on 6615 Pacific Coast Highway Site Plan Review, Long Beach (2023; 12);
- 6615 Pacific Coast Highway Site Plan Review, Long Beach (2023; 34);
- Moonlight Apartments biological assessment, Encinitas (2023; 46);
- Replies to responses to comments on Modera Melrose Mixed-use DEIR, Oceanside (2023; 11);
- Modera Melrose Mixed-use DEIR, Oceanside (2023; 39);
- 550 Piercy Road Industrial IS/MND, San Jose (2023; 28);
- Living Spaces Development IS/MND, Fresno (2023; 28);
- FIND Food Bank Staff Report, Indio (2023; 19);
- Replies to responses to comments on Shadowbox Studios DEIR, Santa Clarita (2023; 35);
- Shadowbox Studios DEIR, Santa Clarita (2023; 50);
- Tulare 40 Generation Facility IS/MND, Tulare County (2023; 20);
- Garden Street Hotel Staff Report, Santa Barbara (2023; 19);
- Replies to responses to comments on 975 Manhattan Apartments Discretionary Approval, Los Angeles (2023; 10);
- 975 Manhattan Apartments Discretionary Approval, Los Angeles (2023; 12);
- 67h visit Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2023; 14);
- Coachella Airport Business Park IS/MND, Coachella (2023; 31);
- 3400 Tecate Warehouse Staff Report, Camarillo (2023; 26);
- Green Valley III Apartments DEIR, Fairfield (2023; 50);
- Pacific Specific Plan DEIR, San Marcos (2023; 55);
- Amara Bay Mixed Use Staff Report, Chula Vista (2023; 46);
- Greenlaw Partners Warehouse IS, Fresno (2023; 23);
- PODS Warehouse IS/MND, Desert Hot Springs (2023; 30);
- 6th visit Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2023; 9);
- Replies on Ormat Brawley Solar Project DEIR, Brawley (2023; 80);
- One Hamilton as part of City of Mill Valley's 2023-2031 Housing Element Update DSEIR (2023; 31);

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- Second letter on Shinohara Project IS/MND, Chula Vista (2023; 22);
- 3890 Depot Road Project IS/MND, Hayward (2023; 33);
- Wellprofit Wellness Mixed-use project CEQA Exemption, Temecula (2023; 31);
- Quail Meadows Apartments CEQA Exemption, Encinitas (2023; 55);
- RCCB Fresno Distribution Center Notice of Exemption, Fresno (2022; 14);
- Stoddard Wells Industrial Project IS/MND, City of Victorville (2022; 31);
- 16454 Adelanto Road Warehouse Distribution Facility Class 32 Categorical Exemption, Adelanto (2022; 17);
- Replies on Pure Water Project – Las Virgenes-Triunfo Joint Powers Authority FPEIR, Agoura (2022; 26);
- Desert Gateway MND Addendum, Desert Hot Springs (2022; 35);
- Blue Oaks Commerce Center MND Addendum, City of Roseville (2022; 12);
- Replies on Coachillin Amendment to Specific Plan, Desert Hot Springs (2022; 24);
- Island View Mixed-Use CEQA Compliance Memo, City of Rancho Cucamonga (2022; 17);
- Prairie Station Apartments IS/MND, City if Inglewood (2022; 32);
- Golden Land Warehouse CEQA Exemption, City of Rialto (2022; 12);
- South Juarez Street Design Review, Banning (2022; 17);
- Replies on Pentair Expansion Industrial Warehouse FMND, Moorpark (2022; 13);
- 2nd Replies on Greentree FEIR, Vacaville (2022; 16);
- Replies on Temporary Outdoor Vehicle Storage FEIR, Port of Hueneme (2022; 21);
- National City-Bayfront, San Diego DEIR (2022; 56);
- Goshen Community Plan General Plan Amendment & Addendum (2022, 6);
- Primrose and Adelanto warehouse Categorical Exemption, Adelanto (2022, 14);
- TenTen Hollywood Categorical Exclusion (2022, 17);
- Waste to Hydrogen project IS/MND, Lancaster (2022, 36);
- Las Virgenes-Triunfo Pure Water Project <Agoura Hills, (2022; 43);
- Shinohara Project IS/MND, Chula Vista (2022; 30);
- Marlborough-Northgate Warehouse IS/MND, Riverside (2022; 33);
- Meyers Ave, Warehouse IS/MND, Escondido IS/MND (2022; 27);
- Northgate Industrial Park IS/MND, Sacramento (2022; 28);
- Ramona-Indian Warehouse IS/MND, Perris (2022; 44);
- Norwalk Entertainment District EIR (2022; 29);
- Breeze Luxury Apartments IS/MND, Oceanside (2022; 40);
- Paso Commons Golden Hills Commerce Center IS/MND, Paso Robles (2022; 35);
- YS Industrial Park Application, Visalia (2022; 20);
- Pentair Expansion Industrial Warehouse IS/MND, Moorpark (2022; 28);
- Salvador Solar IS/MND, Riverside (2022; 27);
- Fresno General Plan Amendment 555 IS/MND (2022; 21);
- 570 Crespi Drive IS/MND, Pacifica (2022; 40);
- Renaissance Ranch Commerce Center DEIR, Temescal Valley (2022; 53);
- Replies on Glen Ivy Senior Living IS/MND, Temescal Valley (2022; 24);

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- Glen Ivy Senior Living IS/MND, Temescal Valley (2022; 46);
- FedEx Distribution Warehouse IS, Lancaster (2022; 35);
- Urban Villages EIR Addendum, San Marcos (2022; 32);
- NextEra San Ardos Solar IS/ND, San Ardo (2022; 20);
- Summit Avenue Warehouse IS/MND, Fontana (2022; 28);
- Gateway at the Oaks DEIR, Thousand Oaks (2022; 30);
- Primrose and Adelanto Warehouse CEQA Exemption, Adelanto (2022; 11);
- Fore Apartments Staff Report, Oxnard (2022; 29);
- 975 Manhattan Rd. discretionary approval, Los Angeles (2022; 12);
- Coachillin DEIR, North Palm Springs (2022; 30);
- 2740 W. Nielsen Ave Warehouse IS/MND, Fresno (2022; 25);
- Golf Center Warehouse Staff Report, Indio (2022; 26);
- Desert Peak Energy IS/MND, Palm Springs (2022; 26);
- Replies on Greentree FEIR, Vacaville (2022; 13);
- Greentree DEIR, Vacaville (2022; 31);
- Town Center DEIR, Laguna Niguel (2022; 16);
- 2nd Replies on Freedom Circle Focus Area and Greystar General Plan Amendment Project FEIR, San Jose (2022; 3);
- Corydon III CEQA Categorical Exemption, Lake Elsinore (2022; 11);
- Park Edge Apartments IS/MND, Santa Maria (2022; 30);
- Replies on UCSF New Hospital FEIR at Parnassus Heights FEIR. San Francisco (2022; 13);
- Replies on North Central Valley BESS Project IS/MND, Stockton (2022; 21);
- 9248 Holly Road Cannabis CEQA Exemption, Adelanto (2022; 12);
- Replies on Amazing 34 Distribution Center IS/MND, San Bernardino (2022; 10);
- Amazing 34 Distribution Center IS/MND, San Bernardino (2022; 28);
- Replies on Freedom Circle Focus Area and Greystar General Plan Amendment Project FEIR, San Jose (2022; 5);
- Replies on Alviso Hotel Project IS/MND, San Jose (2022; 49);
- Bussetto Foods IS/ND, Fresno (2022; 34);
- Spruce Ave Commerce Center, Rialto (2022;);
- 5006 and 5010 Mission Boulevard Warehouse IS/MND, Montclair (2022; 18);
- Conejo Summit IS/MND, Thousand Oaks (2022; 28);
- Sixth visit, Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2022; 4);
- TC NO. CAL. Development Warehousing and Distribution Facility Project DEIR, Stockton (2022; 33);
- Replies on Davidon Homes FEIR, Petaluma (2022; 49);
- Rural preservation and net conservation benefit coalition reply to post hearing briefs, Garnet Solar (2022; 24);
- Garnet Solar direct testimony, New York (2022; 17);
- Fifth visit, Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2022; 11);

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- Shirk & Riggin Industrial Park Application, Visalia (2022; 22);
- Duarte Industrial Application, Visalia (2022; 17);
- Amond World Cold Storage Warehouse IS/MND, Madera (2022; 23);
- Replies on Schulte Logistics Centre EIR, Tracy (2022; 28);
- Alta Cuvee Mixed Use Project Recirculated IS/MND, Ranch Cucamonga (2022; 8);
- Fourth visit, Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2022; 9);
- Replies on 1242 20th Street Wellness Center Project FEIR, Santa Monica (2022; 5);
- 656 South San Vicente Medical Office Project EIR, Los Angeles (2022; 21);
- UCSF New Hospital at Parnassus Heights DEIR. San Francisco (2022; 40);
- DPR-21-021Warehouse IS, Modesto (2022; 19);
- Ormat Brawley Solar Project DEIR, Brawley (2022; 37);
- Site visits to Heber 1 Geothermal Repower Project IS/MND (2022; 31);
- Heritage Industrial Center Design Review, Chula Vista (2022; 13);
- Temporary Outdoor Vehicle Storage DEIR, Port of Hueneme (2022; 31);
- CNU Medical Center and Innovation Park DEIR, Natomas (2022; 35);
- Beverly Boulevard Warehouse IS/MND, Pico Rivera (2021; 28);
- Hagemon Properties IS/MND Amendment, Bakersfield (2022; 23);
- Airport Distribution Center IS/MND, Redding (2021; 22);
- Orchard on Nevada Warehouse Staff Report, Redlands (2021; 24);
- Landings Logistics Center Exemption, Bakersfield (2021; 19);
- Replies on Hearn Veterans Village IS/MND, Santa Rosa (2021; 22);
- North Central Valley BESS Project IS/MND, Stockton (2021; 39);
- 2nd Replies on Heber 1 Geothermal Repower Project IS/MND (2022; 21);
- Stagecoach Solar DEIR, Barstow (2021; 24);
- Updated Sun Lakes Village North EIR Amendment 5, Banning, Riverside County (2021; 35);
- Freedom Circle Focus Area and Greystar General Plan Amendment Project EIR, San Jose (2021; 43);
- Operon HKI Warehouse IS/MND, Perris (2021; 26);
- Fairway Business Park Phase III IS/MND, Lake Elsinore (2021; 23);
- South Stockton Commerce Center IS/MND, Stockton (2021; 31);
- Starpoint Warehouse IS/MND, San Bernardino (2021; 24);
- Replies on Heber 1 Geothermal Repower Project IS/MND (2021; 15);
- Heber 1 Geothermal Repower Project IS/MND (2021; 11);
- Alviso Hotel Project IS/MND, San Jose (2021; 43);
- Replies on Easton Research Park West IS/MND, Rancho Cordova (2021; 3);
- Easton Research Park West IS/MND, Rancho Cordova (2021; 31);
- US Cold Storage DEIR, Hesperia (2021; 30);
- 1242 20th Street Wellness Center Project FEIR, Santa Monica (2021; 23);
- Third visit, Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2021; 10);
- Roseland Creek Community Park Project IS/MND, Santa Rosa (2021; 23);

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- Vista Mar Declaration of Irreparable Harm, Pacifica (2021; 3);
- LogistiCenter at Fairfield IS/MND (2021; 25);
- Alta Cuvee Mixed Use Project IS/MND, Ranch Cucamonga (2021; 29);
- Caligrows Architectural and Site Plan Review, Patterson (2021; 21);
- 1055 E. Sandhill Avenue Warehouse IS/MND, Carson (2021; 10);
- Chestnut & Tenth Street Commercial Project IS/MND, Gilroy (2021; 27);
- Libitzky Management Warehouse IS/MND, Modesto (2021; 20);
- 3rd Replies on Heber 2 Geothermal Repower Project IS/MND, El Centro (2021; 10);
- Medical Office Building DEIR, Santa Cruz (2021; 30);
- Scannell Warehouse DEIR, Richmond (2021; 24);
- Diamond Heights Application, San Francisco (2021; 24);
- Costa Azul Mixed-Use EIR Addendum, San Diego (2021; 25);
- Woodland Research Park DEIR (2021; 45);
- 2nd Replies on Diamond Street Industrial IS/MND, San Marcos (2021; 9);
- Replies on Diamond Street Industrial IS/MND, San Marcos (2021; 3);
- Diamond Street Industrial IS/MND, San Marcos (2021; 28);
- DHS 109 Industrial Park IS/MND, Desert Hot Springs (2021; 33);
- Jersey Industrial Complex Rancho Cucamonga (2022; 22);
- 1188 Champions Drive Parking Garage Staff Report, San Jose (2021; 5);
- San Pedro Mountain, Pacifica (2021; 22);
- Pixior Warehouse IS/MND, Hesperia (2021; 29);
- 2nd Replies on Heber 2 Geothermal Repower Project IS/MND, El Centro (2021; 9);
- Hearn Veterans Village IS/MND, Santa Rosa (2021; 23);
- Second visit, Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2021; 11);
- Replies on Station East Residential/Mixed Use EIR, Union City (2021; 26);
- Schulte Logistics Centre EIR, Tracy (2021; 30);
- 4150 Point Eden Way Industrial Development EIR, Hayward (2021; 13);
- Airport Business Centre IS/MND, Manteca (2021; 27);
- Dual-branded Hotel IS/MND, Santa Clara (2021; 26);
- Legacy Highlands Specific Plan EIR, Beaumont (2021; 47);
- UC Berkeley LRDP and Housing Projects #1 and #2 EIR (2021; 27);
- Santa Maria Airport Business Park EIR, Santa Maria (2021; 27);
- Replies on Coachella Valley Arena EIR Addendum, Thousand Palms (2021; 20);
- Coachella Valley Arena EIR Addendum, Thousand Palms (2021; 35);
- Inland Harbor Warehouse NOD, Ontario (2021; 8);
- Alvarado Specific Plan DEIR, La Mesa (2021; 35);
- Harvill Avenue and Rider Street Terminal Project MND, Riverside (2021; 23);
- Gillespie Field EIR Addendum, El Cajon (2021; 28);
- Heritage Wind Energy Project section 94-c siting process, New York (2021: 99);
- Commercial Street Hotels project Site Plans, Oakland (2021; 19);

- Heber 1 Geothermal Repower Project MND, El Centro (2021; 11);
- Citrus-Slover Warehouse Project MND, Fontana (2021; 20);
- Scott Ranch Project RDEIR (Davidon Homes), Petaluma (2021; 31);
- Replies on StratosFuel Renewable H2 Project MND, Victorville (2021; 5);
- StratosFuel Renewable H2 Project MND, Victorville (2021; 25);
- Replies on PARS Global Storage MND, Murietta (2021; 22);
- Baldwin-Zacharias Master Plans EIR, Patterson (2021; 38);
- 1000 Gibraltar Drive EIR, Milpitas (2021; 20);
- Mango Avenue Industrial Warehouse Project, Fontana, MND (2021; 20);
- Veterans Affairs Site Plan Review No. 20-0102 MND, Bakersfield (2021; 25);
- Replies on UCSF Comprehensive Parnassus Heights Plan EIR (2021; 13);
- 14 Charles Hill Circle Design Review (2021; 11);
- SDG Commerce 217 Warehouse IS, American Canyon (2021; 26);
- Mulqueeney Ranch Wind Repowering Project DSEIR (2021; 98);
- Clawiter Road Industrial Project IS/MND, Hayward (2021; 18);
- Garnet Energy Center Stipulations, New York (2020);
- Heritage Wind Energy Project, New York (2020: 71);
- Ameresco Keller Canyon RNG Project IS/MND, Martinez (2020; 11);
- Cambria Hotel Project Staff Report, Dublin (2020; 19);
- Central Pointe Mixed-Use Staff Report, Santa Ana (2020; 20);
- Oak Valley Town Center EIR Addendum, Calimesa (2020; 23);
- Coachillin Specific Plan MND Amendment, Desert Hot Springs (2020; 26);
- Stockton Avenue Hotel and Condominiums Project Tiering to EIR, San Jose (2020; 19);
- Cityline Sub-block 3 South Staff Report, Sunyvale (2020; 22);
- Station East Residential/Mixed Use EIR, Union City (2020; 21);
- Multi-Sport Complex & Southeast Industrial Annexation Suppl. EIR, Elk Grove (2020; 24);
- Sun Lakes Village North EIR Amendment 5, Banning, Riverside County (2020; 27);
- 2nd comments on 1296 Lawrence Station Road, Sunnyvale (2020; 4);
- 1296 Lawrence Station Road, Sunnyvale (2020; 16);
- Mesa Wind Project EA, Desert Hot Springs (2020; 31);
- 11th Street Development Project IS/MND, City of Upland (2020; 17);
- Vista Mar Project IS/MND, Pacifica (2020; 17);
- Emerson Creek Wind Project Application, Ohio (2020; 64);
- Replies on Wister Solar Energy Facility EIR, Imperial County (2020; 12);
- Wister Solar Energy Facility EIR, Imperial County (2020; 28);
- Crimson Solar EIS/EIR, Mojave Desert (2020, 35) not submitted;
- Sakioka Farms EIR tiering, Oxnard (2020; 14);
- 3440 Wilshire Project IS/MND, Los Angeles (2020; 19);
- Replies on 2400 Barranca Office Development Project EIR, Irvine (2020; 8);

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- 2400 Barranca Office Development Project EIR, Irvine (2020; 25);
- Replies on Heber 2 Geothermal Repower Project IS/MND, El Centro (2020; 4);
- 2nd comments on Heber 2 Geothermal Repower Project IS/MND, El Centro (2020; 8);
- Heber 2 Geothermal Repower Project IS/MND, El Centro (2020; 3);
- Lots 4-12 Oddstad Way Project IS/MND, Pacifica (2020; 16);
- Declaration on DDG Visalia Warehouse project (2020; 5);
- Terraces of Lafayette EIR Addendum (2020; 24);
- AMG Industrial Annex IS/MND, Los Banos (2020; 15);
- Replies to responses to comments on responses on Casmalia and Linden Warehouse, Rialto (2020; 15);
- Clover Project MND, Petaluma (2020; 27);
- Ruby Street Apartments Project Env. Checklist, Hayward (2020; 20);
- Replies to responses to comments on responses on 3721 Mt. Diablo Boulevard Staff Report (2020; 5);
- 3721 Mt. Diablo Boulevard Staff Report (2020; 9);
- Steeno Warehouse IS/MND, Hesperia (2020; 19);
- UCSF Comprehensive Parnassus Heights Plan EIR (2020; 24);
- North Pointe Business Center MND, Fresno (2020; 14);
- Casmalia and Linden Warehouse IS, Fontana (2020; 15);
- Rubidoux Commerce Center Project IS/MND, Jurupa Valley (2020; 27);
- Haun and Holland Mixed Use Center MND, Menifee (2020; 23);
- First Industrial Logistics Center II, Moreno Valley IS/MND (2020; 23);
- GLP Store Warehouse Project Staff Report (2020; 15);
- Replies on Beale WAPA Interconnection Project EA & CEQA checklist (2020; 29);
- 2nd comments on Beale WAPA Interconnection Project EA & CEQA checklist (2020; 34);
- Beale WAPA Interconnection Project EA & CEQA checklist (2020; 30);
- Levine-Fricke Softball Field Improvement Addendum, UC Berkeley (2020; 16);
- Greenlaw Partners Warehouse and Distribution Center Staff Report, Palmdale (2020; 14);
- Humboldt Wind Energy Project DEIR (2019; 25);
- Sand Hill Supplemental EIR, Altamont Pass (2019; 17);
- 1700 Dell Avenue Office Project, Campbell (2019, 28);
- 1180 Main Street Office Project MND, Redwood City (2019; 19:
- Summit Ridge Wind Farm Request for Amendment 4, Oregon (2019; 46);
- Shafter Warehouse Staff Report (2019; 4);
- Park & Broadway Design Review, San Diego (2019; 19);
- Pinnacle Pacific Heights Design Review, San Diego (2019; 19);
- Pinnacle Park & C Design Review, San Diego (2019; 19);
- Preserve at Torrey Highlands EIR, San Diego (2019; 24);
- Santana West Project EIR Addendum, San Jose (2019; 18);
- The Ranch at Eastvale EIR Addendum, Riverside County (2020; 19);

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- Hageman Warehouse IS/MND, Bakersfield (2019; 13);
- Oakley Logistics Center EIR, Antioch (2019; 22);
- 27 South First Street IS, San Jose (2019; 23);
- 2nd replies on Times Mirror Square Project EIR, Los Angeles (2020; 11);
- Replies on Times Mirror Square Project EIR, Los Angeles (2020; 13);
- Times Mirror Square Project EIR, Los Angeles (2019; 18);
- East Monte Vista & Aviator General Plan Amend EIR Addendum, Vacaville (2019; 22);
- Hillcrest LRDP EIR, La Jolla (2019; 36);
- 555 Portola Road CUP, Portola Valley (2019; 11);
- Johnson Drive Economic Development Zone SEIR, Pleasanton (2019; 27);
- 1750 Broadway Project CEQA Exemption, Oakland (2019; 19);
- Mor Furniture Project MND, Murietta Hot Springs (2019; 27);
- Harbor View Project EIR, Redwood City (2019; 26);
- Visalia Logistics Center (2019; 13);
- Cordelia Industrial Buildings MND (2019; 14);
- Scheu Distribution Center IS/ND, Rancho Cucamonga (2019; 13);
- Mills Park Center Staff Report, San Bruno (2019; 22);
- Site visit to Desert Highway Farms IS/MND, Imperial County (2019; 9);
- Desert Highway Farms IS/MND, Imperial County (2019; 12);
- ExxonMobil Interim Trucking for Santa Ynez Unit Restart SEIR, Santa Barbara (2019; 9);
- Olympic Holdings Inland Center Warehouse Project MND, Rancho Cucamonga (2019; 14);
- Replies to responses to comments on responses on Lawrence Equipment Industrial Warehouse, Banning (2019; 19);
- PARS Global Storage MND, Murietta (2019; 13);
- Slover Warehouse EIR Addendum, Fontana (2019; 16);
- Seefried Warehouse Project IS/MND, Lathrop (2019; 19)
- World Logistics Center Site Visit, Moreno Valley (2019; 19);
- Merced Landfill Gas-To-Energy Project IS/MND (2019; 12);
- West Village Expansion FEIR, UC Davis (2019; 11);
- Site visit, Doheny Ocean Desalination EIR, Dana Point (2019; 11);
- Replies to responses to comments on responses on Avalon West Valley Expansion EIR, San Jose (2019; 10);
- Avalon West Valley Expansion EIR, San Jose (2019; 22);
- Sunroad – Otay 50 EIR Addendum, San Diego (2019; 26);
- Del Rey Pointe Residential Project IS/MND, Los Angeles (2019; 34);
- 1 AMD Redevelopment EIR, Sunnyvale (2019; 22);
- Lawrence Equipment Industrial Warehouse IS/MND, Banning (2019; 14);
- SDG Commerce 330 Warehouse IS, American Canyon (2019; 21);
- PAMA Business Center IS/MND, Moreno Valley (2019; 23);
- Cupertino Village Hotel IS (2019; 24);

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- Lake House IS/ND, Lodi (2019; 33);
- Campo Wind Project DEIS, San Diego County (DEIS, (2019; 14);
- Stirling Warehouse MND site visit, Victorville (2019; 7);
- Green Valley II Mixed-Use Project EIR, Fairfield (2019; 36);
- We Be Jammin rezone MND, Fresno (2019; 14);
- Gray Whale Cove Pedestrian Crossing IS/ND, Pacifica (2019; 7);
- Visalia Logistics Center & DDG 697V Staff Report (2019; 9);
- Mather South Community Masterplan Project EIR (2019; 35);
- Del Hombre Apartments EIR, Walnut Creek (2019; 23);
- Otay Ranch Planning Area 12 EIR Addendum, Chula Vista (2019; 21);
- The Retreat at Sacramento IS/MND (2019; 26);
- Site visit to Sunroad – Centrum 6 EIR Addendum, San Diego (2019; 9);
- Sunroad – Centrum 6 EIR Addendum, San Diego (2018; 22);
- North First and Brokaw Corporate Campus Buildings EIR Addendum, San Jose (2018; 30);
- South Lake Solar IS, Fresno County (2018; 18);
- Galloo Island Wind Project Application, New York (not submitted) (2018; 44);
- Doheny Ocean Desalination EIR, Dana Point (2018; 15);
- Stirling Warehouse MND, Victorville (2018; 18);
- LDK Warehouse MND, Vacaville (2018; 30);
- Gateway Crossings FEIR, Santa Clara (2018; 23);
- South Hayward Development IS/MND (2018; 9);
- CBU Specific Plan Amendment, Riverside (2018; 27);
- 2nd Replies to responses to comments on responses on Dove Hill Road Assisted Living Project MND (2018; 11);
- Replies to responses to comments on responses on Dove Hill Road Assisted Living Project MND (2018; 7);
- Dove Hill Road Assisted Living Project MND (2018; 12);
- Deer Ridge/Shadow Lakes Golf Course EIR, Brentwood (2018; 21);
- Pyramid Asphalt BLM Finding of No Significance, Imperial County (2018; 22);
- Amáre Apartments IS/MND, Martinez (2018; 15);
- Petaluma Hill Road Cannabis MND, Santa Rosa (2018; 21);
- 2nd comments on Zeiss Innovation Center IS/MND, Dublin (2018: 12);
- Zeiss Innovation Center IS/MND, Dublin (2018: 32);
- City of Hope Campus Plan EIR, Duarte (2018; 21);
- Palo Verde Center IS/MND, Blythe (2018; 14);
- Logisticenter at Vacaville MND (2018; 24);
- IKEA Retail Center SEIR, Dublin (2018; 17);
- Merge 56 EIR, San Diego (2018; 15);
- Natomas Crossroads Quad B Office Project P18-014 EIR, Sacramento (2018; 12);
- 2900 Harbor Bay Parkway Staff Report, Alameda (2018; 30);
- At Dublin EIR, Dublin (2018; 25);

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- Fresno Industrial Rezone Amendment Application No. 3807 IS (2018; 10);
- Nova Business Park IS/MND, Napa (2018; 18);
- Updated Collision Risk Model Priors for Estimating Eagle Fatalities, USFWS (2018; 57);
- 750 Marlborough Avenue Warehouse MND, Riverside (2018; 14);
- Replies to responses to comments on responses on San Bernardino Logistics Center IS (2018; 12);
- San Bernardino Logistics Center IS (2018; 19);
- CUP2017-16, Costco IS/MND, Clovis (2018; 11);
- Desert Land Ventures Specific Plan EIR, Desert Hot Springs (2018; 18);
- Ventura Hilton IS/MND (2018; 30);
- North of California Street Master Plan Project IS, Mountain View (2018: 11);
- Tamarind Warehouse MND, Fontana (2018; 16);
- Lathrop Gateway Business Park EIR Addendum (2018; 23);
- Centerpointe Commerce Center IS, Moreno Valley (2019; 18);
- Amazon Warehouse Notice of Exemption, Bakersfield (2018; 13);
- CenterPoint Building 3 project Staff Report, Manteca (2018; 23);
- Cessna & Aviator Warehouse IS/MND, Vacaville (2018; 24);
- Napa Airport Corporate Center EIR, American Canyon (2018, 15);
- 800 Opal Warehouse Initial Study, Mentone, San Bernardino County (2018; 18);
- 2695 W. Winton Ave Industrial Project IS, Hayward (2018; 22);
- Trinity Cannabis Cultivation and Manufacturing Facility DEIR, Calexico (2018; 15);
- Shoe Palace Expansion IS/MND, Morgan Hill (2018; 21);
- Newark Warehouse at Morton Salt Plant Staff Report (2018; 15);
- Northlake Specific Plan FEIR “Peer Review”, Los Angeles County (2018; 9);
- Replies to responses to comments on responses on Northlake Specific Plan SEIR, Los Angeles County (2018; 13);
- Northlake Specific Plan SEIR, Los Angeles County (2017; 27);
- Bogle Wind Turbine DEIR, east Yolo County (2017; 48);
- Ferrante Apartments IS/MND, Los Angeles (2017; 14);
- The Villages of Lakeview EIR, Riverside (2017; 28);
- Data Needed for Assessing Trail Management Impacts on Northern Spotted Owl, Marin County (2017; 5);
- Notes on Proposed Study Options for Trail Impacts on Northern Spotted Owl (2017; 4);
- Pyramid Asphalt IS, Imperial County (Declaration) (2017; 5);
- San Gorgonio Crossings EIR, Riverside County (2017; 22);
- Replies to responses to comments on responses on Jupiter Project IS and MND, Apple Valley (2017; 12);
- Proposed World Logistics Center Mitigation Measures, Moreno Valley (2017, 2019; 12);
- MacArthur Transit Village Project Modified 2016 CEQA Analysis (2017; 12);

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- PG&E Company Bay Area Operations and Maintenance HCP (2017; 45);
- Central SoMa Plan DEIR (2017; 14);
- Suggested mitigation for trail impacts on northern spotted owl, Marin County (2016; 5);
- Colony Commerce Center Specific Plan DEIR, Ontario (2016; 16);
- Fairway Trails Improvements MND, Marin County (2016; 13);
- Review of Avian-Solar Science Plan (2016; 28);
- Replies on Pyramid Asphalt IS, Imperial County (2016; 5);
- Pyramid Asphalt IS, Imperial County (2016; 4);
- Agua Mansa Distribution Warehouse Project Initial Study (2016; 14);
- Santa Anita Warehouse MND, Rancho Cucamonga (2016; 12);
- CapRock Distribution Center III DEIR, Rialto (2016: 12);
- Orange Show Logistics Center IS/MND, San Bernardino (2016; 9);
- City of Palmdale Oasis Medical Village Project IS/MND (2016; 7);
- Comments on proposed rule for incidental eagle take, USFWS (2016, 49);
- Replies on Grapevine Specific and Community Plan FEIR, Kern County (2016; 25);
- Grapevine Specific and Community Plan DEIR, Kern County (2016; 15);
- Clinton County Zoning Ordinance for Wind Turbine siting (2016);
- Hallmark at Shenandoah Warehouse Project Initial Study, San Bernardino (2016; 6);
- Tri-City Industrial Complex Initial Study, San Bernardino (2016; 5);
- Hidden Canyon Industrial Park Plot Plan 16-PP-02, Beaumont (2016; 12);
- Kimball Business Park DEIR (2016; 10);
- Jupiter Project IS and MND, Apple Valley, San Bernardino County (2016; 9);
- Revised Draft Giant Garter Snake Recovery Plan of 2015 (2016, 18);
- Palo Verde Mesa Solar Project EIR, Blythe (2016; 27);
- Reply on Fairview Wind Project Natural Heritage Assessment, Ontario, Canada (2016; 14);
- Fairview Wind Project Natural Heritage Assessment, Ontario, Canada (2016; 41);
- Reply on Amherst Island Wind Farm Natural Heritage Assessment, Ontario (2015, 38);
- Amherst Island Wind Farm Natural Heritage Assessment, Ontario (2015, 31);
- Second Reply on White Pines Wind Farm, Ontario (2015, 6);
- Reply on White Pines Wind Farm Natural Heritage Assessment, Ontario (2015, 10);
- White Pines Wind Farm Natural Heritage Assessment, Ontario (2015, 9);
- Proposed Section 24 Specific Plan Agua Caliente Band of Cahuilla Indians DEIS (2015, 9);
- Replies on 24 Specific Plan Agua Caliente Band of Cahuilla Indians FEIS (2015, 6);
- Sierra Lakes Commerce Center Project DEIR, Fontana (2015, 9);
- Columbia Business Center MND, Riverside (2015; 8);
- West Valley Logistics Center Specific Plan DEIR, Fontana (2015, 10);
- Willow Springs Solar Photovoltaic Project DEIR (2015, 28);

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- Alameda Creek Bridge Replacement Project DEIR (2015, 10);
- World Logistic Center Specific Plan FEIR, Moreno Valley (2015, 12);
- Elkhorn Valley Wind Power Project Impacts, Oregon (2015; 143);
- Bay Delta Conservation Plan EIR/EIS, Sacramento (2014, 21);
- Addison Wind Energy Project DEIR, Mojave (2014, 32);
- Replies on the Addison Wind Energy Project DEIR, Mojave (2014, 15);
- Addison and Rising Tree Wind Energy Project FEIR, Mojave (2014, 12);
- Palen Solar Electric Generating System FSA (CEC), Blythe (2014, 20);
- Rebuttal testimony on Palen Solar Energy Generating System (2014, 9);
- Seven Mile Hill and Glenrock/Rolling Hills impacts + Addendum, Wyoming (2014; 105);
- Rising Tree Wind Energy Project DEIR, Mojave (2014, 32);
- Replies on the Rising Tree Wind Energy Project DEIR, Mojave (2014, 15);
- Soitec Solar Development Project PEIR, Boulevard, San Diego County (2014, 18);
- Oakland Zoo expansion on Alameda whipsnake and California red-legged frog (2014; 3);
- Alta East Wind Energy Project FEIS, Tehachapi Pass (2013, 23);
- Blythe Solar Power Project Staff Assessment, California Energy Commission (2013, 16);
- Clearwater and Yakima Solar Projects DEIR, Kern County (2013, 9);
- West Antelope Solar Energy Project IS/MND, Antelope Valley (2013, 18);
- Cuyama Solar Project DEIR, Carrizo Plain (2014, 19);
- Desert Renewable Energy Conservation Plan (DRECP) EIR/EIS (2015, 49);
- Kingbird Solar Photovoltaic Project EIR, Kern County (2013, 19);
- Lucerne Valley Solar Project IS/MND, San Bernardino County (2013, 12);
- Tule Wind project FEIR/FEIS (Declaration) (2013; 31);
- Sunlight Partners LANDPRO Solar Project MND (2013; 11);
- Declaration in opposition to BLM fracking (2013; 5);
- Blythe Energy Project (solar) CEC Staff Assessment (2013;16);
- Rosamond Solar Project EIR Addendum, Kern County (2013; 13);
- Pioneer Green Solar Project EIR, Bakersfield (2013; 13);
- Replies on Soccer Center Solar Project MND (2013; 6);
- Soccer Center Solar Project MND, Lancaster (2013; 10);
- Plainview Solar Works MND, Lancaster (2013; 10);
- Alamo Solar Project MND, Mojave Desert (2013; 15);
- Replies on Imperial Valley Solar Company 2 Project (2013; 10);
- Imperial Valley Solar Company 2 Project (2013; 13);
- FRV Orion Solar Project DEIR, Kern County (PP12232) (2013; 9);
- Casa Diablo IV Geothermal Development Project (2013; 6);
- Reply on Casa Diablo IV Geothermal Development Project (2013; 8);
- Alta East Wind Project FEIS, Tehachapi Pass (2013; 23);
- Metropolitan Air Park DEIR, City of San Diego (2013;);

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- Davidon Homes Tentative Subdivision Rezoning Project DEIR, Petaluma (2013; 9);
- Oakland Zoo Expansion Impacts on Alameda Whipsnake (2013; 10);
- Campo Verde Solar project FEIR, Imperial Valley (2013; 11pp);
- Neg Dec comments on Davis Sewer Trunk Rehabilitation (2013; 8);
- North Steens Transmission Line FEIS, Oregon (Declaration) (2012; 62);
- Summer Solar and Springtime Solar Projects IS/MND Lancaster (2012; 8);
- J&J Ranch, 24 Adobe Lane Environmental Review, Orinda (2012; 14);
- Replies on Hudson Ranch Power II Geothermal Project and Simbol Calipatria Plant II (2012; 8);
- Hudson Ranch Power II Geothermal Project and Simbol Calipatria Plant II (2012; 9);
- Desert Harvest Solar Project EIS, near Joshua Tree (2012; 15);
- Solar Gen 2 Array Project DEIR, El Centro (2012; 16);
- Ocotillo Sol Project EIS, Imperial Valley (2012; 4);
- Beacon Photovoltaic Project DEIR, Kern County (2012; 5);
- Butte Water District 2012 Water Transfer Program IS/MND (2012; 11);
- Mount Signal and Calexico Solar Farm Projects DEIR (2011; 16);
- City of Elk Grove Sphere of Influence EIR (2011; 28);
- Sutter Landing Park Solar Photovoltaic Project MND, Sacramento (2011; 9);
- Rabik/Gudath Project, 22611 Coleman Valley Road, Bodega Bay (CPN 10-0002) (2011; 4);
- Ivanpah Solar Electric Generating System (ISEGS) (Declaration) (2011; 9);
- Draft Eagle Conservation Plan Guidance, USFWS (2011; 13);
- Niles Canyon Safety Improvement Project EIR/EA (2011; 16);
- Route 84 Safety Improvement Project (Declaration) (2011; 7);
- Rebuttal on Whistling Ridge Wind Energy Power DEIS, Skamania County, (2010; 6);
- Whistling Ridge Wind Energy Power DEIS, Skamania County, Washington (2010; 41);
- Klickitat County's Decisions on Windy Flats West Wind Energy Project (2010; 17);
- St. John's Church Project DEIR, Orinda (2010; 14);
- Results Radio Zone File #2009-001 IS/MND, Conaway site, Davis (2010; 20);
- Rio del Oro Specific Plan Project FEIR, Rancho Cordova (2010;12);
- Results Radio Zone File #2009-001, Mace Blvd site, Davis (2009; 10);
- Answers to Questions on 33% RPS Implementation Analysis Preliminary Results Report (2009; 9);
- SEPA Determination of Non-significance regarding zoning adjustments for Skamania County, Washington (Second Declaration) (2008; 17);
- Draft 1A Summary Report to CAISO (2008; 10);
- Hilton Manor Project Categorical Exemption, County of Placer (2009; 9);

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- Protest of CARE to Amendment to the Power Purchase and Sale Agreement for Procurement of Eligible Renewable Energy Resources Between Hatchet Ridge Wind LLC and PG&E (2009; 3);
- Tehachapi Renewable Transmission Project EIR/EIS (2009; 142);
- Delta Shores Project EIR, south Sacramento (2009; 11 + addendum 2);
- Declaration in Support of Care's Petition to Modify D.07-09-040 (2008; 3);
- The Public Utility Commission's Implementation Analysis December 16 Workshop for the Governor's Executive Order S-14-08 to implement a 33% Renewable Portfolio Standard by 2020 (2008; 9);
- The Public Utility Commission's Implementation Analysis Draft Work Plan for the Governor's Executive Order S-14-08 to implement a 33% Renewable Portfolio Standard by 2020 (2008; 11);
- Draft 1A Summary Report to California Independent System Operator for Planning Reserve Margins (PRM) Study (2008; 7.);
- SEPA Determination of Non-significance regarding zoning adjustments for Skamania County, Washington (Declaration) (2008; 16);
- Colusa Generating Station, California Energy Commission PSA (2007; 24);
- Rio del Oro Specific Plan Project Recirculated DEIR, Mather (2008: 66);
- Replies on Regional University Specific Plan EIR, Roseville (2008; 20);
- Regional University Specific Plan EIR, Roseville (2008: 33);
- Clark Precast, LLC's "Sugarland" project, ND, Woodland (2008: 15);
- Cape Wind Project DEIS, Nantucket (2008; 157);
- Yuba Highlands Specific Plan EIR, Spenceville, Yuba County (2006; 37);
- Replies to responses to comments on responses on North Table Mountain MND, Butte County (2006; 5);
- North Table Mountain MND, Butte County (2006; 15);
- Windy Point Wind Farm EIS (2006; 14 and Powerpoint slide replies);
- Shiloh I Wind Power Project EIR, Rio Vista (2005; 18);
- Buena Vista Wind Energy Project NOP, Byron (2004; 15);
- Callahan Estates Subdivision ND, Winters (2004; 11);
- Winters Highlands Subdivision IS/ND (2004; 9);
- Winters Highlands Subdivision IS/ND (2004; 13);
- Creekside Highlands Project, Tract 7270 ND (2004; 21);
- Petition to California Fish and Game Commission to list Burrowing Owl (2003; 10);
- Altamont Pass Wind Resource Area CUP renewals, Alameda County (2003; 41);
- UC Davis Long Range Development Plan: Neighborhood Master Plan (2003; 23);
- Anderson Marketplace Draft Environmental Impact Report (2003; 18);
- Negative Declaration of the proposed expansion of Temple B'nai Tikyah (2003; 6);
- Antonio Mountain Ranch Specific Plan Public Draft EIR (2002; 23);
- Replies on East Altamont Energy Center evidentiary hearing (2002; 9);
- Revised Draft Environmental Impact Report, The Promenade (2002; 7);

- Recirculated Initial Study for Calpine's proposed Pajaro Valley Energy Center (2002; 3);
- UC Merced -- Declaration (2002; 5);
- Replies on Atwood Ranch Unit III Subdivision FEIR (2003; 22);
- Atwood Ranch Unit III Subdivision EIR (2002; 19);
- California Energy Commission Staff Report on GWF Tracy Peaker Project (2002; 20);
- Silver Bend Apartments IS/MND, Placer County (2002; 13);
- UC Merced Long-range Development Plan DEIR and UC Merced Community Plan DEIR (2001; 26);
- Colusa County Power Plant IS, Maxwell (2001; 6);
- Dog Park at Catlin Park, Folsom, California (2001; 5);
- Calpine and Bechtel Corporations' Biological Resources Implementation and Monitoring Program (BRMIMP) for the Metcalf Energy Center (2000; 10);
- Metcalf Energy Center, California Energy Commission FSA (2000);
- US Fish and Wildlife Service Section 7 consultation with the California Energy Commission regarding Calpine and Bechtel Corporations' Metcalf Energy Center (2000; 4);
- California Energy Commission's Preliminary Staff Assessment of the proposed Metcalf Energy Center (2000: 11);
- Site-specific management plans for the Natomas Basin Conservancy's mitigation lands, prepared by Wildlands, Inc. (2000: 7);
- Affidavit of K. Shawn Smallwood in Spirit of the Sage Council, et al. (Plaintiffs) vs. Bruce Babbitt, Secretary, U.S. Department of the Interior, et al. (Defendants), Injuries caused by the No Surprises policy and final rule which codifies that policy (1999: 9).
- California Board of Forestry's proposed amended Forest Practices Rules (1999);
- Sunset Skyranch Airport Use Permit IS/MND (1999);
- Ballona West Bluffs Project Environmental Impact Report (1999; oral presentation);
- Draft Recovery Plan for Giant Garter Snake (Fed. Reg. 64(176): 49497-49498) (1999; 8);
- Draft Recovery Plan for Arroyo Southwestern Toad (1998);
- Pacific Lumber Co. (Headwaters) HCP & EIR, Fortuna (1998; 28);
- Natomas Basin HCP Permit Amendment, Sacramento (1998);
- San Diego Multi-Species Conservation Program FEIS/FEIR (1997; 10);

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Volunteer comments on other Environmental Review Documents:

- Proposed Regulation for California Fish and Game Code Section 3503.5 (2015: 12);
- Statement of Overriding Considerations related to extending Altamont Winds, Inc.'s Conditional Use Permit PLN2014-00028 (2015; 8);
- Covell Village PEIR, Davis (2005; 19);
- Bureau of Land Management Wind Energy Programmatic EIS Scoping (2003; 7.);

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- NEPA Environmental Analysis for Biosafety Level 4 National Biocontainment Laboratory (NBL) at UC Davis (2003: 7);
- Notice of Preparation of UC Merced Community and Area Plan EIR, on behalf of The Wildlife Society—Western Section (2001: 8.);
- Preliminary Draft Yolo County Habitat Conservation Plan (2001; 2 letters totaling 35.);
- Merced County General Plan Revision, notice of Negative Declaration (2001: 2.);
- Notice of Preparation of Campus Parkway EIR/EIS (2001: 7.);
- Draft Recovery Plan for the bighorn sheep in the Peninsular Range (Ovis candensis) (2000);
- Draft Recovery Plan for the California Red-legged Frog (Rana aurora draytonii), on behalf of The Wildlife Society—Western Section (2000: 10.);
- Sierra Nevada Forest Plan Amendment Draft Environmental Impact Statement, on behalf of The Wildlife Society—Western Section (2000: 7.);
- State Water Project Supplemental Water Purchase Program, Draft Program EIR (1997);
- Davis General Plan Update EIR (2000);
- Turn of the Century EIR (1999: 10);
- Proposed termination of Critical Habitat Designation under the Endangered Species Act (Fed. Reg. 64(113): 31871-31874) (1999);
- NOA Draft Addendum to the Final Handbook for Habitat Conservation Planning and Incidental Take Permitting Process, termed the HCP 5-Point Policy Plan (Fed. Reg. 64(45): 11485 - 11490) (1999; 2 + attachments);
- Covell Center Project EIR and EIR Supplement (1997).

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Position Statements I prepared the following position statements for the Western Section of The Wildlife Society, and one for nearly 200 scientists:

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- Recommended that the California Department of Fish and Game prioritize the extermination of the introduced southern water snake in northern California. The Wildlife Society--Western Section (2001);
- Recommended that The Wildlife Society—Western Section appoint or recommend members of the independent scientific review panel for the UC Merced environmental review process (2001);
- Opposed the siting of the University of California's 10th campus on a sensitive vernal pool/grassland complex east of Merced. The Wildlife Society--Western Section (2000);
- Opposed the legalization of ferret ownership in California. The Wildlife Society--Western Section (2000);
- Opposed the Proposed "No Surprises," "Safe Harbor," and "Candidate Conservation Agreement" rules, including permit-shield protection provisions (Fed. Reg. Vol. 62, No. 103, pp. 29091-29098 and No. 113, pp. 32189-32194). This statement was signed by 188 scientists and went to the responsible federal agencies, as well as to the U.S. Senate and House of Representatives.

Posters at Professional Meetings

O4B-144

- Leyvas, E. and K. S. Smallwood. 2015. Rehabilitating injured animals to offset and rectify wind project impacts. Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 9-12 March 2015.
- Smallwood, K. S., J. Mount, S. Standish, E. Leyvas, D. Bell, E. Walther, B. Karas. 2015. Integrated detection trials to improve the accuracy of fatality rate estimates at wind projects. Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 9-12 March 2015.
- Smallwood, K. S. and C. G. Thelander. 2005. Lessons learned from five years of avian mortality research in the Altamont Pass WRA. AWEA conference, Denver, May 2005.
- Neher, L., L. Wilder, J. Woo, L. Spiegel, D. Yen-Nakafugi, and K.S. Smallwood. 2005. Bird's eye view on California wind. AWEA conference, Denver, May 2005.
- Smallwood, K. S., C. G. Thelander and L. Spiegel. 2003. Toward a predictive model of avian fatalities in the Altamont Pass Wind Resource Area. Windpower 2003 Conference and Convention, Austin, Texas.
- Smallwood, K.S. and Eva Butler. 2002. Pocket Gopher Response to Yellow Star-thistle Eradication as part of Grassland Restoration at Decommissioned Mather Air Force Base, Sacramento County, California. White Mountain Research Station Open House, Barcroft Station.
- Smallwood, K.S. and Michael L. Morrison. 2002. Fresno kangaroo rat (*Dipodomys nitratoides*) Conservation Research at Resources Management Area 5, Lemoore Naval Air Station. White Mountain Research Station Open House, Barcroft Station.
- Smallwood, K.S. and E.L. Fitzhugh. 1989. Differentiating mountain lion and dog tracks. Third Mountain Lion Workshop, Prescott, AZ.
- Smith, T. R. and K. S. Smallwood. 2000. Effects of study area size, location, season, and allometry on reported Sorex shrew densities. Annual Meeting of the Western Section of The Wildlife Society.

Presentations at Professional Meetings and Seminars

O4B-145

Smallwood, N., and S. Smallwood. 2025. Improving methods in environmental review Part 1: Habitat assessment of wildlife species with potential to occur on a project site. The Wildlife Society – Western Section, Visalia, California, 5 February 2025.

Smallwood, S., and N. Smallwood. 2025. Improving methods in environmental review part 2: reconnaissance surveys for characterizing the wildlife community. The Wildlife Society – Western Section, Visalia, California, 5 February 2025.

Eagle mortality at wind turbines. Wings over the Columbia Gorge. Friends of the Columbia Gorge, 4 January 2024.

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(Cont.)

Ecology and recent population trend of burrowing owls in the Altamont Pass Wind Resource Area. The Wildlife Society – Western Section Burrowing Owl Symposium, Riverside, California, 6 February 2023.

Renewable energy impacts to burrowing owls. The Wildlife Society – Western Section Burrowing Owl Symposium, Riverside, California, 7 February 2023.

Smallwood, K.S. and D.A. Bell. Long-Term Population Trend of Burrowing Owls in Vasco Caves. Via Zoom to Audubon Society, 21 October 2021.

Long-Term Population Trend of Burrowing Owls in the Altamont. Golden Gate Audubon, 21 October 2020.

Long-Term Population Trend of Burrowing Owls in the Altamont. East Bay Regional Park District 2020 Stewardship Seminar, Oakland, California, 18 November 2020.

Smallwood, K.S., D.A. Bell, and S, Standish. Dogs detect larger wind energy effects on bats and birds. The Wildlife Society, 28 September 2020.

Smallwood, K.S. and D.A. Bell. Effects of wind turbine curtailment on bird and bat fatalities in the Altamont Pass Wind Resource Area. The Wildlife Society, 28 September 2020.

Smallwood, K.S., D.A. Bell, and S, Standish. Dogs detect larger wind energy effects on bats and birds. The Wildlife Survey, 7 February 2020.

Smallwood, K.S. and D.A. Bell. Effects of wind turbine curtailment on bird and bat fatalities in the Altamont Pass Wind Resource Area. The Wildlife Survey, 7 February 2020.

Dog detections of bat and bird fatalities at wind farms in the Altamont Pass Wind Resource Area. East Bay Regional Park District 2019 Stewardship Seminar, Oakland, California, 13 November 2019.

Repowering the Altamont Pass. Altamont Symposium, The Wildlife Society – Western Section, 5 February 2017.

Developing methods to reduce bird mortality in the Altamont Pass Wind Resource Area, 1999-2007. Altamont Symposium, The Wildlife Society – Western Section, 5 February 2017.

Conservation and recovery of burrowing owls in Santa Clara Valley. Santa Clara Valley Habitat Agency, Newark, California, 3 February 2017.

Mitigation of Raptor Fatalities in the Altamont Pass Wind Resource Area. Raptor Research Foundation Meeting, Sacramento, California, 6 November 2015.

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From burrows to behavior: Research and management for burrowing owls in a diverse landscape. California Burrowing Owl Consortium meeting, 24 October 2015, San Jose, California.

The Challenges of repowering. Keynote presentation at Conference on Wind Energy and Wildlife Impacts, Berlin, Germany, 10 March 2015.

Research Highlights Altamont Pass 2011-2015. Scientific Review Committee, Oakland, California, 8 July 2015.

Siting wind turbines to minimize raptor collisions: Altamont Pass Wind Resource Area. US Fish and Wildlife Service Golden Eagle Working Group, Sacramento, California, 8 January 2015.

Evaluation of nest boxes as a burrowing owl conservation strategy. Sacramento Chapter of the Western Section, The Wildlife Society. Sacramento, California, 26 August 2013.

Predicting collision hazard zones to guide repowering of the Altamont Pass. Conference on wind power and environmental impacts. Stockholm, Sweden, 5-7 February 2013.

Impacts of Wind Turbines on Wildlife. California Council for Wildlife Rehabilitators, Yosemite, California, 12 November 2012.

Impacts of Wind Turbines on Birds and Bats. Madrone Audubon Society, Santa Rosa, California, 20 February 2012.

Comparing Wind Turbine Impacts across North America. California Energy Commission Staff Workshop: Reducing the Impacts of Energy Infrastructure on Wildlife, 20 July 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. California Energy Commission Staff Workshop: Reducing the Impacts of Energy Infrastructure on Wildlife, 20 July 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. Alameda County Scientific Review Committee meeting, 17 February 2011

Comparing Wind Turbine Impacts across North America. Conference on Wind energy and Wildlife impacts, Trondheim, Norway, 3 May 2011.

Update on Wildlife Impacts in the Altamont Pass Wind Resource Area. Raptor Symposium, The Wildlife Society—Western Section, Riverside, California, February 2011.

Siting Repowered Wind Turbines to Minimize Raptor Collisions. Raptor Symposium, The Wildlife Society - Western Section, Riverside, California, February 2011.

O4B-145
(Cont.)

Wildlife mortality caused by wind turbine collisions. Ecological Society of America, Pittsburgh, Pennsylvania, 6 August 2010.

Map-based repowering and reorganization of a wind farm to minimize burrowing owl fatalities. California burrowing Owl Consortium Meeting, Livermore, California, 6 February 2010.

Environmental barriers to wind power. Getting Real About Renewables: Economic and Environmental Barriers to Biofuels and Wind Energy. A symposium sponsored by the Environmental & Energy Law & Policy Journal, University of Houston Law Center, Houston, 23 February 2007.

Lessons learned about bird collisions with wind turbines in the Altamont Pass and other US wind farms. Meeting with Japan Ministry of the Environment and Japan Ministry of the Economy, Wild Bird Society of Japan, and other NGOs Tokyo, Japan, 9 November 2006.

Lessons learned about bird collisions with wind turbines in the Altamont Pass and other US wind farms. Symposium on bird collisions with wind turbines. Wild Bird Society of Japan, Tokyo, Japan, 4 November 2006.

Responses of Fresno kangaroo rats to habitat improvements in an adaptive management framework. California Society for Ecological Restoration (SERCAL) 13th Annual Conference, UC Santa Barbara, 27 October 2006.

Fatality associations as the basis for predictive models of fatalities in the Altamont Pass Wind Resource Area. EEI/APLIC/PIER Workshop, 2006 Biologist Task Force and Avian Interaction with Electric Facilities Meeting, Pleasanton, California, 28 April 2006.

Burrowing owl burrows and wind turbine collisions in the Altamont Pass Wind Resource Area. The Wildlife Society - Western Section Annual Meeting, Sacramento, California, February 8, 2006.

Mitigation at wind farms. Workshop: Understanding and resolving bird and bat impacts. American Wind Energy Association and Audubon Society. Los Angeles, CA. January 10 and 11, 2006.

Incorporating data from the California Wildlife Habitat Relationships (CWHR) system into an impact assessment tool for birds near wind farms. Shawn Smallwood, Kevin Hunting, Marcus Yee, Linda Spiegel, Monica Parisi. Workshop: Understanding and resolving bird and bat impacts. American Wind Energy Association and Audubon Society. Los Angeles, CA. January 10 and 11, 2006.

Toward indicating threats to birds by California's new wind farms. California Energy Commission, Sacramento, May 26, 2005.

O4B-145
(Cont.)

Avian collisions in the Altamont Pass. California Energy Commission, Sacramento, May 26, 2005.

Ecological solutions for avian collisions with wind turbines in the Altamont Pass Wind Resource Area. EPRI Environmental Sector Council, Monterey, California, February 17, 2005.

Ecological solutions for avian collisions with wind turbines in the Altamont Pass Wind Resource Area. The Wildlife Society—Western Section Annual Meeting, Sacramento, California, January 19, 2005.

Associations between avian fatalities and attributes of electric distribution poles in California. The Wildlife Society - Western Section Annual Meeting, Sacramento, California, January 19, 2005.

Minimizing avian mortality in the Altamont Pass Wind Resources Area. UC Davis Wind Energy Collaborative Forum, Palm Springs, California, December 14, 2004.

Selecting electric distribution poles for priority retrofitting to reduce raptor mortality. Raptor Research Foundation Meeting, Bakersfield, California, November 10, 2004.

Responses of Fresno kangaroo rats to habitat improvements in an adaptive management framework. Annual Meeting of the Society for Ecological Restoration, South Lake Tahoe, California, October 16, 2004.

Lessons learned from five years of avian mortality research at the Altamont Pass Wind Resources Area in California. The Wildlife Society Annual Meeting, Calgary, Canada, September 2004.

The ecology and impacts of power generation at Altamont Pass. Sacramento Petroleum Association, Sacramento, California, August 18, 2004.

Burrowing owl mortality in the Altamont Pass Wind Resource Area. California Burrowing Owl Consortium meeting, Hayward, California, February 7, 2004.

Burrowing owl mortality in the Altamont Pass Wind Resource Area. California Burrowing Owl Symposium, Sacramento, November 2, 2003.

Raptor Mortality at the Altamont Pass Wind Resource Area. National Wind Coordinating Committee, Washington, D.C., November 17, 2003.

Raptor Behavior at the Altamont Pass Wind Resource Area. Annual Meeting of the Raptor Research Foundation, Anchorage, Alaska, September, 2003.

Raptor Mortality at the Altamont Pass Wind Resource Area. Annual Meeting of the Raptor Research Foundation, Anchorage, Alaska, September, 2003.

O4B-145
(Cont.)

California mountain lions. Ecological & Environmental Issues Seminar, Department of Biology, California State University, Sacramento, November, 2000.

Intra- and inter-turbine string comparison of fatalities to animal burrow densities at Altamont Pass. National Wind Coordinating Committee, Carmel, California, May, 2000.

Using a Geographic Positioning System (GPS) to map wildlife and habitat. Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

Suggested standards for science applied to conservation issues. Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

The indicators framework applied to ecological restoration in Yolo County, California. Society for Ecological Restoration, September 25, 1999.

Ecological restoration in the context of animal social units and their habitat areas. Society for Ecological Restoration, September 24, 1999.

Relating Indicators of Ecological Health and Integrity to Assess Risks to Sustainable Agriculture and Native Biota. International Conference on Ecosystem Health, August 16, 1999.

A crosswalk from the Endangered Species Act to the HCP Handbook and real HCPs. Southern California Edison, Co. and California Energy Commission, March 4-5, 1999.

Mountain lion track counts in California: Implications for Management. Ecological & Environmental Issues Seminar, Department of Biological Sciences, California State University, Sacramento, November 4, 1998.

“No Surprises” -- Lack of science in the HCP process. California Native Plant Society Annual Conservation Conference, The Presidio, San Francisco, September 7, 1997.

In Your Interest. A half hour weekly show aired on Channel 10 Television, Sacramento. In this episode, I served on a panel of experts discussing problems with the implementation of the Endangered Species Act. Aired August 31, 1997.

Spatial scaling of pocket gopher (*Geomyidae*) density. Southwestern Association of Naturalists 44th Meeting, Fayetteville, Arkansas, April 10, 1997.

Estimating prairie dog and pocket gopher burrow volume. Southwestern Association of Naturalists 44th Meeting, Fayetteville, Arkansas, April 10, 1997.

Ten years of mountain lion track survey. Fifth Mountain Lion Workshop, San Diego, February 27, 1996.

Study and interpretive design effects on mountain lion density estimates. Fifth Mountain Lion Workshop, San Diego, February 27, 1996.

O4B-145
(Cont.)

Small animal control. Session moderator and speaker at the California Farm Conference, Sacramento, California, Feb. 28, 1995.

Small animal control. Ecological Farming Conference, Asylomar, California, Jan. 28, 1995.

Habitat associations of the Swainson's Hawk in the Sacramento Valley's agricultural landscape. 1994 Raptor Research Foundation Meeting, Flagstaff, Arizona.

Alfalfa as wildlife habitat. Seed Industry Conference, Woodland, California, May 4, 1994.

Habitats and vertebrate pests: impacts and management. Managing Farmland to Bring Back Game Birds and Wildlife to the Central Valley. Yolo County Resource Conservation District, U.C. Davis, February 19, 1994.

Management of gophers and alfalfa as wildlife habitat. Orland Alfalfa Production Meeting and Sacramento Valley Alfalfa Production Meeting, February 1 and 2, 1994.

Patterns of wildlife movement in a farming landscape. Wildlife and Fisheries Biology Seminar Series: Recent Advances in Wildlife, Fish, and Conservation Biology, U.C. Davis, Dec. 6, 1993.

Alfalfa as wildlife habitat. California Alfalfa Symposium, Fresno, California, Dec. 9, 1993.

Management of pocket gophers in Sacramento Valley alfalfa. California Alfalfa Symposium, Fresno, California, Dec. 8, 1993.

Association analysis of raptors in a farming landscape. Plenary speaker at Raptor Research Foundation Meeting, Charlotte, North Carolina, Nov. 6, 1993.

Landscape strategies for biological control and IPM. Plenary speaker, International Conference on Integrated Resource Management and Sustainable Agriculture, Beijing, China, Sept. 11, 1993.

Landscape Ecology Study of Pocket Gophers in Alfalfa. Alfalfa Field Day, U.C. Davis, July 1993.

Patterns of wildlife movement in a farming landscape. Spatial Data Analysis Colloquium, U.C. Davis, August 6, 1993.

Sound stewardship of wildlife. Veterinary Medicine Seminar: Ethics of Animal Use, U.C. Davis. May 1993.

O4B-145 (Cont.)

Landscape ecology study of pocket gophers in alfalfa. Five County Grower's Meeting, Tracy, California. February 1993.

Turbulence and the community organizers: The role of invading species in ordering a turbulent system, and the factors for invasion success. Ecology Graduate Student Association Colloquium, U.C. Davis. May 1990.

Evaluation of exotic vertebrate pests. Fourteenth Vertebrate Pest Conference, Sacramento, California. March 1990.

Analytical methods for predicting success of mammal introductions to North America. The Western Section of the Wildlife Society, Hilo, Hawaii. February 1988.

A state-wide mountain lion track survey. Sacramento County Dept Parks and Recreation. April 1986.

The mountain lion in California. Davis Chapter of the Audubon Society. October 1985.

Ecology Graduate Student Seminars, U.C. Davis, 1985-1990: Social behavior of the mountain lion; Mountain lion control; Political status of the mountain lion in California.

Other forms of Participation at Professional Meetings

O4B-146

- Scientific Committee, Conference on Wind energy and Wildlife impacts, Berlin, Germany, March 2015.
- Scientific Committee, Conference on Wind energy and Wildlife impacts, Stockholm, Sweden, February 2013.
- Workshop co-presenter at Birds & Wind Energy Specialist Group (BAWESG) Information sharing week, Bird specialist studies for proposed wind energy facilities in South Africa, Endangered Wildlife Trust, Darling, South Africa, 3-7 October 2011.
- Scientific Committee, Conference on Wind energy and Wildlife impacts, Trondheim, Norway, 2-5 May 2011.
- Chair of Animal Damage Management Session, The Wildlife Society, Annual Meeting, Reno, Nevada, September 26, 2001.
- Chair of Technical Session: Human communities and ecosystem health: Comparing perspectives and making connection. Managing for Ecosystem Health, International Congress on Ecosystem Health, Sacramento, CA August 15-20, 1999.
- Student Awards Committee, Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.
- Student Mentor, Annual Meeting of the Western Section of The Wildlife Society, Riverside, CA, January, 2000.

O4B-147

Printed Mass Media

Smallwood, K.S., D. Mooney, and M. McGuinness. 2003. We must stop the UCD biolab now. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 2002. Spring Lake threatens Davis. Op-Ed to the Davis Enterprise.

Smallwood, K.S. Summer, 2001. Mitigation of habitation. The Flatlander, Davis, California.

Entrikan, R.K. and K.S. Smallwood. 2000. Measure O: Flawed law would lock in new taxes. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 2000. Davis delegation lobbies Congress for Wildlife conservation. Op-Ed to the Davis Enterprise.

Smallwood, K.S. 1998. Davis Visions. The Flatlander, Davis, California.

Smallwood, K.S. 1997. Last grab for Yolo's land and water. The Flatlander, Davis, California.

Smallwood, K.S. 1997. The Yolo County HCP. Op-Ed to the Davis Enterprise.

O4B-147 (Cont.)

Radio/Television

PBS News Hour,

FOX News, Energy in America: Dead Birds Unintended Consequence of Wind Power Development, August 2011.

KXJZ Capital Public Radio -- Insight (Host Jeffrey Callison). Mountain lion attacks (with guest Professor Richard Coss). 23 April 2009;

KXJZ Capital Public Radio -- Insight (Host Jeffrey Callison). Wind farm Rio Vista Renewable Power. 4 September 2008;

KQED QUEST Episode #111. Bird collisions with wind turbines. 2007;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. December 27, 2001;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. May 3, 2001;

KDVS Speaking in Tongues (host Ron Glick), Yolo County HCP: 1 hour. February 8, 2001;

KDVS Speaking in Tongues (host Ron Glick & Shawn Smallwood), California Energy Crisis: 1 hour. Jan. 25, 2001;

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KDVS Speaking in Tongues (host Ron Glick), Headwaters Forest HCP: 1 hour. 1998;

Davis Cable Channel (host Gerald Heffernon), Burrowing owls in Davis: half hour. June, 2000;

Davis Cable Channel (hosted by Davis League of Women Voters), Measure O debate: 1 hour. October, 2000;

KXTV 10, In Your Interest, The Endangered Species Act: half hour. 1997.

O4B-148 (Cont.)

Reviews of Journal Papers (Some scientific journals for whom I've provided peer review)

O4B-149

Journal	**Journal**
American Naturalist	Journal of Animal Ecology
Journal of Wildlife Management	Western North American Naturalist
Auk	Journal of Raptor Research
Biological Conservation	National Renewable Energy Lab reports
Canadian Journal of Zoology	Oikos
Western Birds	Journal of Caribbean Ornithology
Ecosystem Health	The Prairie Naturalist
Environmental Conservation	Restoration Ecology
Environmental Management	Southwestern Naturalist
Functional Ecology	The Wildlife Society--Western Section Trans.
Journal of Zoology (London)	Proc. Int. Congress on Managing for Ecosystem Health
Journal of Applied Ecology	Transactions in GIS
Ecology	Tropical Ecology
Wildlife Society Bulletin	Peer J
Conservation Biology	Biology Open
Western Wildlife	PLOS One
Heliyon	Global Ecology and Conservation
Wildlife Monographs	Journal for Nature Conservation
Biological Control	Ecological Solutions and Evidence
Wind Energy	Environmental and Ecological Statistics
The Condor	Ecosphere
Diversity	Renewable and Sustainable Energy Reviews
Northeastern Naturalist	

Committees

- Scientific Review Committee, Alameda County, Altamont Pass Wind Resource Area
- Ph.D. Thesis Committee, Steve Anderson, University of California, Davis
- MS Thesis Committee, Marcus Yee, California State University, Sacramento

O4B-150

Other Professional Activities or Products

O4B-151

Testified in Federal Court in Denver during 2005 over the fate of radio-nuclides in the soil at Rocky Flats Plant after exposure to burrowing animals. My clients won a judgment of $553,000,000. I have also testified in many other cases of litigation under CEQA, NEPA, the Warren-Alquist Act, and other environmental laws. My clients won most of the cases for which I testified.

Testified before Environmental Review Tribunals in Ontario, Canada regarding proposed White Pines, Amherst Island, and Fairview Wind Energy projects.

Testified in Skamania County Hearing in 2009 on the potential impacts of zoning the County for development of wind farms and hazardous waste facilities.

Testified in deposition in 2007 in the case of O'Dell et al. vs. FPL Energy in Houston, Texas.

Testified in Klickitat County Hearing in 2006 on the potential impacts of the Windy Point Wind Farm.

Memberships in Professional Societies

O4B-152

The Wildlife Society
Raptor Research Foundation

Honors and Awards

O4B-153

Fulbright Research Fellowship to Indonesia, 1987
J.G. Boswell Full Academic Scholarship, 1981 college of choice
Certificate of Appreciation, The Wildlife Society—Western Section, 2000, 2001
Northern California Athletic Association Most Valuable Cross Country Runner, 1984
American Legion Award, Corcoran High School, 1981, and John Muir Junior High, 1977
CIF Section Champion, Cross Country in 1978
CIF Section Champion, Track & Field 2 mile run in 1981
National Junior Record, 20 kilometer run, 1982
National Age Group Record, 1500 meter run, 1978

Community Activities

O4B-154

District 64 Little League Umpire, 2003-2007
Dixon Little League Umpire, 2006-07
Davis Little League Chief Umpire and Board member, 2004-2005
Davis Little League Safety Officer, 2004-2005

Davis Little League Certified Umpire, 2002-2004
Davis Little League Scorekeeper, 2002
Davis Visioning Group member
Petitioner for Writ of Mandate under the California Environmental Quality Act against City of Woodland decision to approve the Spring Lake Specific Plan, 2002
Served on campaign committees for City Council candidates

O4B-154
(Cont.)

Letter O4C

REPORT

REVIEW OF NOISE ANALYSIS IN RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS PROJECT DRAFT EIR

SCH NO. 2026010094, AUGUST 2026

SACRAMENTO, CA

RWDI # 2605604

October 15, 2026

Prepared for Holder Law Group on behalf of
Rio Americano Community Alliance

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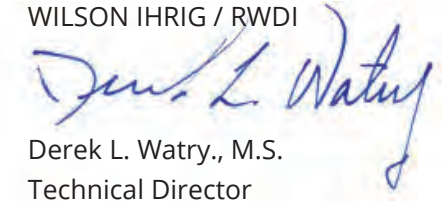
In this report, I review the noise analysis presented in the *Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project* ("DEIR"), inclusive of relevant appendices.

Wilson Ihrig, now wholly owned by RWDI USA LLC, has practiced exclusively in the field of acoustics since 1966. During our 60 years of operation, we have prepared hundreds of noise studies for Environmental Impact Reports and Statements. We have one of the largest technical laboratories in the acoustical consulting industry. We also regularly utilize industry-standard acoustical programs such as Environmental Noise Model (ENM), Traffic Noise Model (TNM), SoundPLAN, and CADNA. I have worked at Wilson Ihrig for 34 years and have personally worked on dozens of CEQA and NEPA environmental noise studies.

I have practiced as an acoustical consultant for 34 years having joined Wilson Ihrig in 1992. I myself have worked on many EIRs and technical documents supporting CEQA analyses. Please find my resumé attached to this report.

Finally, please let me know if you have any questions about my review or conclusions regarding the subject DEIR.

Very truly yours,
WILSON IHRIG / RWDI



Derek L. Watry., M.S.
Technical Director

1

1 ADVERSE EFFECTS OF NOISE[1]

Although the health effects of noise are not taken as seriously in the United States as they are in other countries, they are real and, in many parts of the country, pervasive.

Noise-Induced Hearing Loss

If a person is repeatedly exposed to loud noises, he or she may experience noise-induced hearing impairment or loss. In the United States, both the Occupational Health and Safety Administration (OSHA) and the National Institute for Occupational Safety and Health (NIOSH) promote standards and regulations to protect the hearing of people exposed to high levels of industrial noise.

2

Speech Interference

A common problem associated with noise is speech interference. In addition to the obvious issues that may arise from misunderstandings, speech interference also leads to problems with concentration fatigue, irritation, decreased working capacity, and automatic stress reactions. For complete speech intelligibility, the sound level of the speech should be 15 to 18 dBA higher than the background noise. Typical indoor speech levels are 45 to 50 dBA at 1 meter, so any noise above 30 dBA begins to interfere with speech intelligibility. The common reaction to higher background noise levels is to raise one's voice. If this is required persistently for long periods of time, stress reactions and irritation will likely result.

Sleep Disturbance

Noise can disturb sleep by making it more difficult to fall asleep, by waking someone after they are asleep, or by altering their sleep stage, e.g., reducing the amount of rapid eye movement (REM) sleep. Noise exposure for people who are sleeping has also been linked to increased blood pressure, increased heart rate, increase in body movements, and other physiological effects. Not surprisingly, people whose sleep is disturbed by noise often experience secondary effects such as increased fatigue, depressed mood, and decreased work performance.

Cardiovascular and Physiological Effects

Human bodily reactions to noise are rooted in the "fight or flight" response that evolved when many noises signaled imminent danger. These include increased blood pressure, elevated heart rate, and vasoconstriction. Prolonged exposure to acute noises can result in permanent effects such as hypertension and heart disease.

Impaired Cognitive Performance

Studies have established that noise exposure impairs people's abilities to perform complex tasks (tasks that require attention to detail or analytical processes) and it makes reading, paying attention, solving

[1] More information on these and other adverse effects of noise may be found in *Guidelines for Community Noise*, eds B Berglund, T Lindvall, and D Schwela, World Health Organization, Geneva, Switzerland, 1999.

problems, and memorizing more difficult. This is why there are standards for classrooms background noise levels and why office and libraries are designed to provide quiet work environments. 2 cont

2 PREFACE TO COMMENTS

The residents in the area surrounding the Rio Americano athletic field ('Raider Stadium' in the DEIR) at Rio Americano High School are not unique in their concern about sports facility noise. I have previously been involved in numerous matters in which such noise was contentious, including high school sport field developments in Albany and the Brentwood neighborhood of Los Angeles, a Little League field development in Atherton, a batting cage in Castro Valley, and the improvement of a football stadium in Monterey. Sport field noises are unnatural, unusual, and, in the ears of many, unnecessary, especially after dark, in addition to being potentially loud. 3

Following a large sporting event such as a varsity football game, the ensuing noise associated with people leaving – many having parked off-site – brings with it additional nighttime noises such as people yelling to each other as they part, car doors slamming, engines starting and revving, potentially people honking as frustration mounts if traffic bogs down on the local streets, and music from radios playing. We are talking about a largely high-school population here, and while it may not be possible to identify which particular teenager will be disrespectful of neighbor's noise sensitivity, given the size of the group, it is probable that at least some will be. These "exit" noises are ones over which the school authorities should be required to control by posting adequate staff and/or security personnel throughout the entire area where people park, including off-site.

The unwanted aspect of all these noises is a factor that should be taken into consideration when determining if this project is approved. I note that at least 24 households mention noise as a concern in letters sent to the SJUSD during the scoping phase of the DEIR [DEIR Appendix A]. As I will explain in the remainder of this report, the DEIR does an inadequate job of addressing those aspects of noise which it does treat quantitatively and does not even consider many of the associated noises that local residents are so rightfully concerned about. 4

3 STADIUM IMPROVEMENTS PROJECT CONTEXT

The existing stadium was built in 1963, and minor improvements have been made in recent years. At this point, the stadium has a maximum seating capacity of 288 and nighttime activities are limited due to the need to use diesel-powered temporary lighting. The proposed improvements would increase the seating capacity nearly 9-fold (to 2,575 people) and, more importantly when it comes to negatively impacting adjacent residents, install permanent lights and an upgraded public address ("PA") system which would enable a marked increase in both evening and nighttime activity and noise [DEIR at p. 3-4 and 1-1]. The expanded seating capacity would be achieved by installing new, larger metal bleachers [DEIR at p. 3-8] which sports fans notoriously use as a rallying noise-generator by stomping their feet. 5

4 COMMENTS ON DEIR NOISE ANALYSIS

4.1 DEIR inadequately quantifies "football game" noise sources

It is clear that reference noise level measurements of a football game were made on August 29, 2025 when Rio Americano played a game at El Camino High School, but it is much less clear where exactly they were made and what exactly was measured. The DEIR lacks both a map showing where the measurements were made and any sort of detailed description of what "football game" noises, exactly, were captured by the measurements. Somewhat ironically, the measurements of a girls soccer game at Rio Americano's field are very well documented, though the data from those measurements are of little importance in determining the impact of the football games.

The best descriptions of the various locations where measurements were made at El Camino High School are on page 4.3-23 of the DEIR:

> 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 Leq 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 Leq 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 Leq behind the western bleachers near the announcer cabin and speaker system and 77.7 dBA Leq 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 Lmax. The highest maximum level, 92.7 dBA Lmax, was measured behind the western bleachers near the announcer cabin and speaker system; other maximum levels were 87.9 dBA Lmax behind the eastern bleachers near the residential fence line, 78.7 dBA Lmax at the northeastern corner of the field, 89.7 dBA Lmax along the northern edge of the field, and 80.3 dBA Lmax along the southern edge of the field. [emphasis added]

6

From the above DEIR passage, I surmise the following and provide associated critique:

1. Pairing these descriptions and numerical values with the noise data in Appendix D, one may surmise the following:

7

Description	Appendix D Designation	Comment
Behind eastern bleachers	LT-01	The Lmax value, 87.9 dBA, is the average over 6 hours. The actual maximum level was **96.0 dBA**. The Leq value, 64.7 dBA, appears to be an error. The average of the six values in Appendix D is 66.7 dBA. The highest value in any one hour was **72.6 dBA**.
Behind western bleachers	LT-02	The Lmax value, 92.7 dBA, is the average over 6 hours. The actual maximum level was **99.5 dBA**. The Leq value, 74.8 dBA, appears to be an error. The average of the six values in Appendix D is 76.4 dBA. The highest value in any one hour was **84.1 dBA**.
Northeastern corner of field	ST-01	The values given are for a 20-minute measurement. No detailed description of what happened during those 20 minutes is provided.
Northern edge of field	ST-02	The values given are for a 20-minute measurement. No detailed description of what happened during those 20 minutes is provided.
Southern edge of field	ST-03	The values given are for a 20-minute measurement. No detailed description of what happened during those 20 minutes is provided.

7 cont

Regarding the long-term measurement data (LT-01 and LT-02), the DEIR at page 4.3-9 states that they "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", implying that the short-term date better represent the game time noise levels. However, the highest noise levels measured during the game period – 7:30 to at least 9:30 p.m. (the start time is provided on DEIR page 4.3-9, but the ending time is not provided) – occurred at LT-02 in the 8:00 to 9:00 p.m. hour: 84.1 dBA Leq and 99.5 dBA Lmax. Applying the 17 dBA of attenuation with distance asserted in the DEIR [at p. 4.3-24], the corresponding Leq value at the houses on Whitehall Way would be 67.1 dBA Leq, considerably (6 dBA) to significantly (19 dBA) higher than the 48 to 61 dBA Leq range given in the DEIR at page 4.3-24. The attenuated maximum level, 82.5 dBA Lmax, would likewise be 6 to 20 dBA higher than the 62 to 76 dBA Lmax range reported in the DEIR.

8

The DEIR states on page 4.3-12 that "the research underpinning [County noise] policies is useful for understanding project impacts, and these policies and standards are used, in part, in the noise assessment provided in this section." The most applicable policy is for non-transportation noises, and that is summarized in Table 4.3-10 of the DEIR [p. 4.3-11]. For all residential outdoor areas, the applicable limits are 55 dBA L50 and 75 dBA Lmax (unless reduced by 5 dB for sounds consisting primarily of speech or music,

9

which the crowd and PA noise arguably are, but that adjustment is unnecessary to make my point here). Going back to the LT-02 data in Appendix D, the L50 level was 76.9 dBA during the 7:00 to 8:00 p.m. and 76.6 dBA during the 8:00 to 9:00 p.m. hour.[2] Attenuating these by 17 dBA yields 59.6 to 59.9 dBA L50 at the Whitehall residences, exceeding the County noise policy. As stated above the maximum level at the Whitehall residences based on the El Camino game data would be 82.5 dBA Lmax, well exceeding the baseline County standard of 75 dBA Lmax. 9 cont

Given that the long term data necessarily captured all noise associated with the football game whereas the 20-minute short term data may not have, greater reliance should be placed on this analysis using the DEIR's long term data. Doing so greatly supports the neighboring residents' concern that football game noise will truly be a significant noise impact that degrades their quality of life. 10

2. The measured noise levels were all characterized as being 50 feet from one or more noise sources.

To the extent that the noise source(s) was/were distributed, this is erroneous. For example, if the crowd cheering were distributed over the entire area of the 200-ft by 30-ft bleachers at El Camino, the sound level from the nearest seats would dominate such that the sound level from the farther seat would contribute negligibly.[3] However, as the assessment distance moves farther away, the geometry would change such that the sound level from the farther seats would begin to matter. One way to intuitively grasp this is as follows: 11

A measurement 50 feet from the edge of a 200-ft wide bleacher would be 50 feet from the nearest fan and 250 feet from the farthest fan, a 5-fold difference. However, a measurement 300 feet from the edge of the bleacher would be 300 feet from the nearest fan and 500 feet from the farthest fan. Because of the manner in which decibels attenuate with distance for point sources, the decibel levels of the near and far fans are 14 dB apart at the 50-ft location but only 4 dB apart at the 300-ft location. Because of the way decibels sum (being a logarithmic scale), the far fan's yelling would not influence the measurement at 50 feet, but it would at 300 feet.

This is a methodological error that should be corrected. I assert that an analysis treating the distributed sources as area sources is appropriate and that treating the fans in the bleachers and the band as point sources is inappropriate

[2] In Appendix D, the hourly data for the hours from 16:00 to 22:00 are the Leq, Lmax, L50, and L90. In the table, the L90 values are all numerically higher than the L50 values. This is impossible by definition. The L90 is the level exceeded 90% of the time during the hour, and the L50 is the level exceeded 50% of the time during the hour. I am assuming the numerical data are reversed, i.e., that the data labeled "L50" is actually L90 and that labeled "L90" is actually L50.

[3] The approximate dimensions of the stadium seating at El Camino High School were obtained using Google Earth Pro.

and prejudicially underestimates the noise levels at nearby residences and the American River Parkway. 11 cont

3. The noise sources are inadequately described and/or characterized.

The hallmark of CEQA is transparency so that the public and decision-makers can understand and properly consider the environmental impacts of a project. In this case, the descriptions and characterizations of the noise measurements at El Camino High School fail to meet this standard. It is absolutely unclear where, exactly, the measurements were made, and, more importantly, there is a complete dearth of information about what source or sources contributed to each reported level. The DEIR does mention that, in general, football games "generate the largest crowds, heaviest use of the PA system, and highest levels of cheering and band activity". However, the reader has no idea which of these were captured by the reported noise levels. In particular, one is left wondering if band noise was included at all in the short-term measurements. The "one size fits all" nature of the football game noise reference level makes it impossible to ascertain the accuracy of the noise analysis (even by a person with 34 years of experience in acoustics) and does not allow for the non-quantitative aspects of the new evening and nighttime noises to be taken into consideration. 12

4.2 DEIR fails to adequately analyze "foot stomping" noise

One noise source that may very reasonably be expected to be introduced into the local nighttime noise environment is fans stomping on the metal floorboards of the bleachers. This is a familiar rallying tactic that high-school students may be expected to take full advantage of. One local resident shared that this is already done at nearby Jesuit High School[4] and four other households specifically raised this issue during the scoping phase of the project.[5] Just as one kettle drum player contributes significant sound energy to an orchestra, only a relatively small number of fans need to stomp in unison to excite the entire metal bleacher structure, greatly amplifying their efforts. As the sound of a rattling metal bleacher certainly meets the definition of *noise*, this should be included in the quantified noise analysis. 13

The DEIR does recognize the issue because it is mentioned Mitigation Measure 4.3-1b, however, without a quantified analysis there is little sense of importance and no way to assess how much "sound-deadening treatment" is actually required [DEIR at p. 1-13]. This, in itself, renders the proposed mitigation nearly toothless, and this is then compounded by an "escape valve" that enables the District to forego treatment if found to be infeasible for a number of reasons. While it is proper that the noise analysis consider non-quantifiable aspects of noise as well as quantifiable ones, CEQA does encourage – if not require – efforts to conduct objective, quantified analyses and assessment when reasonable to do so, and an analysis of foot stomping noise should be done by the proponent's noise analyst. Only after

[4] Personal communication with Barbara Dugal, 6 October 2026.
[5] Appendix A: Letters from Brooke Banks, Darlene Vaira, Elizabeth Hughes, and Joe and Barbara Selewicz.

that, can effective and enforceable mitigations measures for this characteristic, foreseeable noise source be developed. 13 cont

4.3 DEIR fails to consider off-site automobile noise

The DEIR analysis of parking lot noise errs in two ways. First, and most importantly, it only considers noise coming from the school parking lot, projecting the reference level at 50 feet to the nearest residence 350 feet away. The DEIR's own traffic study indicates that for a "highly attended" football game, as many as 623 vehicles would have to park in the neighborhoods around the school because campus parking could not accommodate them. [DEIR Appendix E, Table 16, at p. 15] These vehicles will not be 350 feet from residences; they will be more like 50 feet. The noise from these 623 vehicles is not addressed in the DEIR. 14

Second, the parking lot noise analysis uses an "Leq" reference level. "Leq" stands for *equivalent level* which is acoustical engineering lingo for "average". However, what bothers people – what impacts them – is not the average but the short-term maximums of door closures, engine starts, engines revving, potentially squealing tires, potentially horns honking, and potentially people talking loudly to each other as they part ways. The DEIR analysis should be revised to quantify and assess these noises so that the public and decision-makers get a true picture of the noise impacts off-site parking will have on neighboring residents. 15

5 COMMENTS REGARDING PROPOSED MITIGATION MEASURES

Despite the shortcomings in the DEIR noise analysis described above, the environmental analysis nonetheless correctly concludes that operation of the improved stadium would result in **significant and unavoidable noise impacts**. As such, CEQA requires the San Juan Unified School District to adopt all feasible mitigation measures to reduce or eliminate those impacts.[6] It is our contention that the impacts of "football noise" based on the quantified analysis may be underestimated and that stomping noise (which the DEIR acknowledges only obliquely as 'bleacher activity' and 'footfall or vibration-related noise'), has yet to be adequately analyzed in any quantified manner. In this section, I review the proposed mitigation measures and provide additional, feasible measures that should also be implemented. 16

5.1 Public Address System Design and Operation

Mitigation Measure 4.3-1b on page 1-11 lists six general design principles for the PA system with the presumably good intention of developing a system that will minimally impact the nearby residents and wildlife. Be that as it may, because the system is not yet designed, the DEIR relies upon a performance standard, rather than prescriptive measures, to mitigate noise from the PA system, specifically stating: 17

[6] California Public Resources Code § 21002.

> 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 Lmax at the nearest residential property line. [DEIR at p. 1-12]

17 cont

The DEIR also requires the District to conduct a "sound check and property-line noise measurement" prior to operating the PA system, to document the settings, and to prohibit event staff from increasing the volume forever after. That is all well and good, but I suggest that a more robust monitoring system should be used for at least the entire first season since the PA system's output will depend on the vocal effort of the announcers and the compression of any recorded playback as well as the system settings. Relatively inexpensive systems are available from a number of commercial vendors that would monitor the noise level, make those measured levels publicly available, send alerts to designated staff and make audio recordings if/when a pre-programmed trigger level were exceeded.[7] For the past 9 years, Wilson Ihrig / RWDI has overseen the deployment of one of these systems for noise monitoring of Levi's Stadium in Santa Clara, California.[8] This system enables community members to see for themselves that the District is abiding by the project's mitigation measures. Given Sacramento's climate, it may be possible to run the system entirely off solar power, though it may also be advisable to connect it to line power.

18

5.2 Event Scheduling and Use Restrictions

Mitigation Measure 4.3-1b establishes that use of the PA system, broadcast of amplified music, and band activity shall cease if a football game goes past 10:00 p.m. At least one of the referenced remote monitoring systems could be programmed to lower the trigger threshold to something less than 70 dBA to capture any use of the PA system after 10:00 p.m.

19

5.3 Artificial Noisemakers and Spectator Controls

Mitigation Measure 4.3-1b prohibits use of "Artificial noisemakers, including air horns, bullhorns, cowbells, megaphones, amplified cheering devices, and similar items" [DEIR at p. 1-12]. Once again, a remote noise monitoring system with audio recording capability could be used to determine if any such banned noisemaker exceeded the PA limit of 70 dBA Lmax.

20

5.4 Bleacher and Ramp Noise Controls

Mitigation Measure 4.3-1b states in full:

- 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,

21

[7] Three commercial vendors are Seti-Media (https://seti-media.com/), Sigicom (https://www.sigicom.com/), and Specto Technology (https://www.spectotechnology.com).
[8] https://seti-media.com/infopopulation/levis_stadium/

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 [DEIR at p. 4.3-26].

21 cont

As noted previously, the lack of a quantitative analysis of this noise source known to be a problem at Jesuit High School makes effective enforcement of this mitigation measure difficult, if not impossible. Before effective prescriptive measures can be determined, the scope and scale of the impact should be analyzed and disclosed.

22

5.4.1 Adding Mass and/or Damping to Bleacher Seats and Floorboards

As the DEIR text indicates, the efficient radiation and amplification of noise by the bleachers when driven by foot stomping may be reduced by applying a damping material to the underside of the seats and floorboards. Three such potential treatments are:

1. Kinetics Damping Compound KDC-E-162
2. Kinetics Sound Deadener KDD-3642
3. QuietCoat 118

23

Product information sheets for these are appended to this report.

While the efficacy of any one treatment should be verified by empirical testing on an actual metal bleacher, the expected noise reduction is 5 to 15 dB.

Because all of these treatments would be applied to the undersides of the bleachers, the grounds the DEIR gives for finding step-surface treatments infeasible (durability, weather exposure, maintenance, or safety) would not apply.

5.4.2 Reflecting and Absorbing Bleacher Sound

Although Mitigation Measure 4.3-1b mentions "absorptive or shielding material along bleacher sides" [DEIR at p. 4.3-26], it does not develop the concept in any way. As with other aspects of the DEIR noise analysis, a more rigorous treatment would be helpful in determining prescriptively what would be beneficial. Lacking that analysis, one can still say qualitatively that an absorptive barrier around parts of the bleachers would take some of the acoustical energy out of the environment (reducing noise levels by absorbing the energy) and also redirect the remaining energy away from sensitive areas, namely, the residences and the American River Parkway.

24

Figure 1 shows where the sound absorbing walls might be. The walls themselves could be built of concrete masonry units (CMU) which is a very inexpensive design. On the sides of both and the back of the Visitors bleachers (red lines) the walls could be 3 feet above the floorboards – sloping up along the sides – so as to not block the line of sight of fans, yet still absorb and reflect noise from the bleacher structure (including whatever residual noise there is from walking and stomping even with

treatment). On the back side of the Home bleachers (yellow line), the wall should be 5 feet above the highest floorboard so as to reflect and absorb sound from both the bleacher structure and cheering to minimize transmission to the American River Parkway. Note that walls are not needed along much of the back of the Visitors bleachers nor the southwest ends of either bleachers as sound propagating in those directions more or less remains on school property. An example of an acceptable absorptive material is Acoustement 40 which Wilson Ihrig has recommended on many projects over several decades.[9] This material has proven to be very durable in exterior environments; there are other equivalent materials that could also be considered. 24 cont

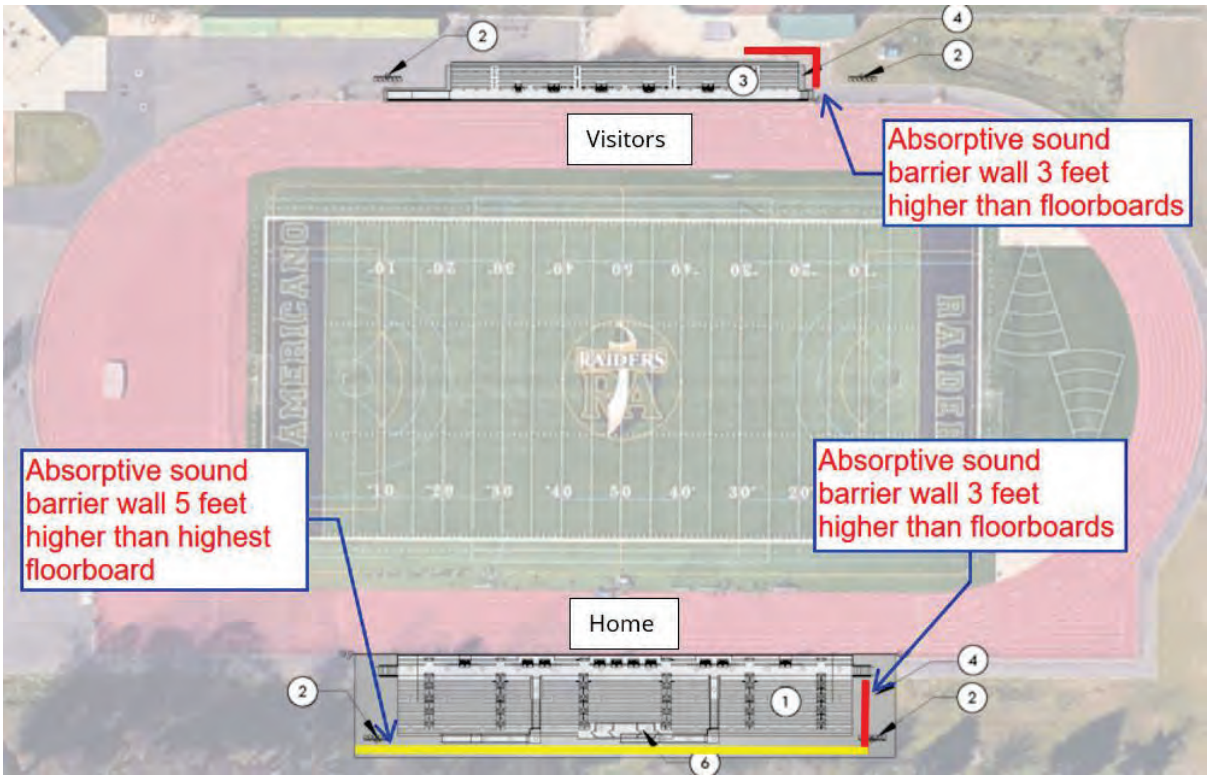


Figure 1 Conceptual Locations and Heights of Absorptive/Reflective Sound Barrier Walls

[9] https://www.acoustement.com/acoustement-40/

6 CONCLUSION

I find that the DEIR noise analysis – despite concluding that noise impacts would be significant and unavoidable – does not properly convey to the public the degradation that would come to the currently quiet nighttime environment in the area surrounding the Rio Americano High School Stadium. This is due primarily to the DEIR's reliance on a vague, undecipherable, "one size fits all" quantitative analysis of "football noise". As noted in this report, there are also qualitative factors that differentiate "noise" from "sound", and those are not considered or conveyed. 25

As a technical matter, the DEIR did not obviously consider all relevant noise sources, principally, band activity and foot-stomping on metal bleachers – both foreseeable. Nor does it address noise associated with automobile use such as door slams, engines starting and revving, loud stereo use, and honking. 26

The noise analysis of nighttime football games does ostensibly cover cheering from fans and announcements from the PA system, however, this analysis is wanting because it treats the noise from the distributed fans in the bleachers as a simple point source. If band noise is considered at all, it would also have been treated as a point source in the "one size fits all" analysis. 27

Finally, some of the noise mitigation measures presented in the DEIR appear to be well intentioned, but, as written, may not be effectively enforceable. I suggest that a remote noise monitoring system with a public-facing website would do much to bolster the community's confidence that PA announcements conform to the performance standards and that scheduling restrictions and the prohibition on artificial noise makers are implemented as proposed. Mitigation proposed for noise from the bleachers – which includes both noise radiated from the structure itself and from crowd cheering – could and should be bolstered by both a better quantitative analysis of noise levels and better specified prescriptive measures for damping the structure and constructing absorptive walls around parts of the bleachers. 28

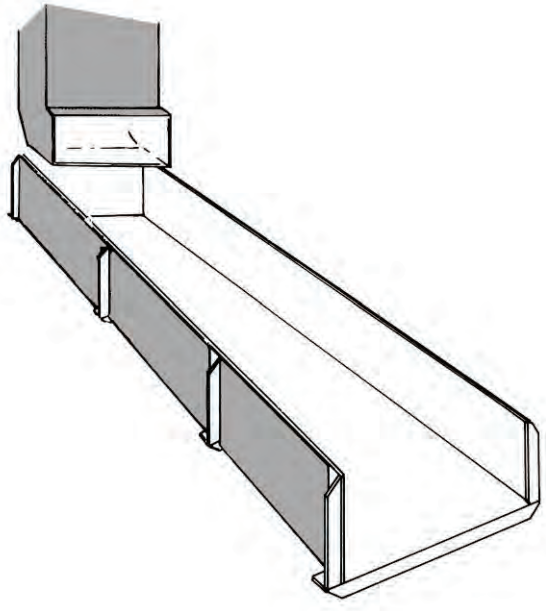
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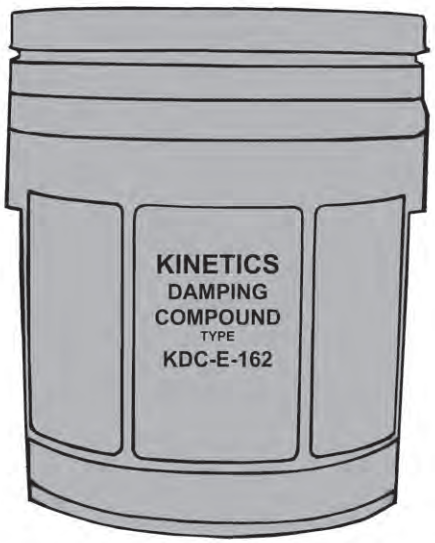
Model KDC-E-162 viscoelastic damping compound is used to reduce noise radiated by vibration or shock excited metal surfaces and panels by imparting vibration damping to metal or other hard nonmetallic, shifting the peaks of the generated sound by lowering the natural frequency, and increasing the sound transmission loss.

Model KDC-E-162 Damping Compound has low flame spread and smoke generating properties as tested under ASTM-D635-63 and ASTM-E-162 (see physical data), and is resistant to most commonly used acids, alkalies, and solvents.

Model KDC-E-162 Damping Compound is easily troweled or air sprayed onto a clean surface. Model KDC has a consistency equivalent to sprayable loose paste and does not require extensive stirring or mixing or the addition of thickening agents prior to its usage. Vertical surfaces can be sprayed a thickness of 1/8" (3 mm) with no sagging or slumping. Adhesion is excellent on clean metal as well as on hard nonmetallic surfaces.

When sprayed, model KDC-E-162 provides a tough, flexible, attractive, and non-abrasive stipple effect having a light tan finish. For outdoor applications, the damping compound can be painted with enamel or epoxy-type paints for color matching or to provide additional protection.





Application

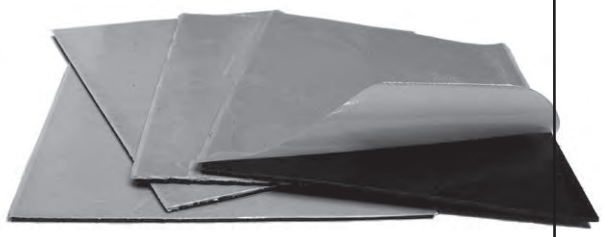
Kinetics Damping Compound model KDC-E-162 is suitable for use in a wide variety of applications where it is intended to damp or eliminate the ringing noise caused by vibrating or shock excited metal and hard non-metallic surfaces. Model KDC also is recommended for use in architectural and mechanical equipment applications such as treating of ducts, mixing boxes, sound-proof doors, and metal partitions in the new construction field where it is mandatory to use non-combustible or non-smoke generating materials to meet local fire codes and ordinances.

Spray application of model KDC-E-162 provides an attractive stippled appearance while at the same time decreases the radiated noise level due to vibration or shock excitation and increases the sound transmission loss of the treated material. The damping compound can also be troweled onto the surface to be treated.

KINETICS®

Sound Deadener

Model KDD-3642



29
cont

Application

KDD-3642 Sound Deadener is suitable in a wide variety of applications where it is intended to damp or eliminate the “tinniness” type noise caused by vibrating metal surfaces and panels. The KDD-3642 Sound Deadener should be applied to a clean dry surface at room temperature with a hand roller to ensure even pressure. Firm even pressure is required to bond damper to substrate. Before application the product should be staged at temperature higher than 50°F for not less than 3 hours.

Typical applications include:

- Bodies, doors, firewalls, and floors of trucks, buses, agricultural, and off-highway equipment.
- Metal office furniture
- Sinks, bathtubs, and shower stalls
- Air Conditioners
- Appliance cabinets
- Rapid transit or railway cars
- Recreational vehicles
- Chutes, bins, & hoppers
- Motor and transformer housings
- Machine housing belt guards
- Sheet metal ducts, mixing boxes, and terminal Units

Description

KDD-3642 Sound Deadener consists of a bituminous sheet damping material designed for cost effective vibration damping. Model KDD-3642 Sound Deadener effectively reduces the resonant vibration of sheet metal panels that radiate noise. It also reduces the loudness and duration caused by random impact noises when panels are struck. The material is rated self extinguishing, is black in color, is available in 36" x 42" x 0.060" and weighs 0.579 PSF. The material can be slit, punched, or die cut into parts to meet the customer’s specifications.

Model KDD-3642 contains a pressure-sensitive adhesive on one side which is protected by an easily strippable release liner. The adhesive is a high performance acrylic adhesive which exhibits high tack for easy installation resulting in 100% contact for maximum damping effectiveness.

QuietCoat®

Acoustical Coating



Anti-sound & vibration coating for cars, appliances, HVAC, and electronics

QuietCoat® 118 is a sprayable, viscoelastic polymer that reduces noise and vibration with minimum weight, bulk and cost. QuietCoat® is engineered specifically for coating nonporous materials including stainless steel, galvanized iron, aluminum and composite (reinforced plastic) materials.

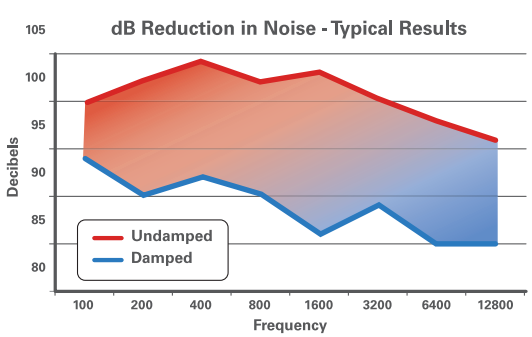
QuietCoat® Benefits:

- Typical noise reduction of 6dB to 20dB*
- Easily applied with brush, roller, air gun, or airless sprayer
- Ideal for most porous and nonporous metal surfaces - cars, studs, HVAC ducts, roofing, machinery, and appliances
- Fully ROHS compliant
- Fast-drying in under 20 minutes
- Easy cleanup, water-soluble
- Meets industry flammability standards
- Noise-damping results will continue to improve for 14 days
- Tested in accordance with ASTM E-756 vibration testing
- Tested in accordance with FMVSS302; burn resistance testing for materials used in occupant compartments of motor vehicles
- Environmentally friendly, lab tested
- Low VOC and low odor

Visit www.QuietRock.com for application instructions and complete architectural documentation.

Product Specifications:

Model:	QuietCoat® 118
Solid Content:	>77 wt %
Compliance:	Low VOC (<0.1 g/l)
Density:	Wet - 13 lbs/gal (1560 kg/m^3) Dry - 8.5 lbs/g
Coverage:	40 - 80 sqft/gal
Layer Thickness:	0.02" - 0.06"
Drying Time:	20 min
Curing Time:	72 hours
Coverage:	40 - 80 sqft/g
Storage temp:	40°-100°F - Do not freeze



*Depending on application. Application thickness and environment may influence noise reduction ratings. PABCO® Gypsum cannot guarantee actual noise reduction ratings. The information contained in this document is for general information purposes only.

29 cont.

PABCO Gypsum
what the job demands

PABCO® Gypsum | 37851 Cherry Street, Newark, CA 94560 | 1.800.797.8159 | www.PabcoGypsum.com | www.QuietRock.com | PN: 101-00004-060315

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Specifications

KDD-3642 Sound Deadener shall consist of a bitumen based material, coated with a pressure-sensitive adhesive on one side, protected by a release paper which is removed prior to installation. The release paper shall be double-coated to provide both release from the adhesive and blocking resistance in shipping and storage.

The material shall be furnished in sheets/die-cut parts having a black color, thickness of 0.060” ± 0.005” and a weight of 0.579 Lbs. per sq. ft.

Model KDD-3642 shall be free from flammable vapors and shall be self extinguishing as defined by FMVSS 302.

The material shall provide excellent resistance to water and shall be capable of withstanding intermittent temperatures up to 250°F without blistering or sliding down vertical surfaces.

Model KDD-3642 shall provide a combined loss factor at 200 Hz of 0.194 as measured at 68°F on a 0.032” steel.

Model KDD-3642 sheets/die-cut parts shall be provided by Kinetics Noise Control, Inc.

Physical Properties

Type:	Bitumen-based black
Thickness:	0.060" ± 0.005" (1.5 mm ± 0.1 mm)
Weight:	0.579 lbs./sq. ft. (2.6 kg/m^2)
Standard Sheet Size:	36" x 42" (914 mm x 1067 mm) or die-cut parts
Water Resistance:	Excellent
Flammability:	Self-extinguishing as defined by FMVSS 302
Odor:	Non-toxic
Application Temperature:	68°F +
Heat Resistance:	195° F Continuous; 250° F Intermittent
Cold Impact:	No adhesive loss @ -13° F
Peel Resistance:	>15 N/mm
Storage:	59-95° F up to 6 months

Oberst Data

@ 200 Hz 0.032" Steel

Temperature		Loss Factor
°C	°F	
-20	-4	0.082
-10	14	0.166
0	32	0.231
10	50	0.240
20	68	0.194
30	86	0.116
40	104	0.055
50	122	0.029
60	140	0.019

29 cont.

KINETICS Noise Control

kineticsnoise.com
sales@kineticsnoise.com
1-800-959-1229

Physical Properties:

Color: Light Tan

Consistency: Sprayable loose paste

Flash Point: None (water emulsion)

Solids Content: 55% by weight

Weight Wet: 10.9 ± .2 lbs./gal. (1.3 ± 0.09 kg/l)

Weight Dry: 5.75 ± .1 lbs./gal. (0.68 ± 0.05 kg/l)

Temperature Range (cured): -20° to 200°F (-29° to 92°C)

Specific Gravity (cured): 2.04

Chemical Resistance: Resistant to dilluted acids, alkali, grease, gasoline, aliphatic oils and vermin.

Surface Flammability Characteristics:
(ASTM-E-162 by U.S. Testing Company, Inc.)

- Flame Spread Index: 0.59
- Smoke Generated, Mg: 0.1
- Fuel Contribution: 0

Thermal Conductivity (k)
0.42 BTU/hr. x sq. ft. x °F/ft.
(6.2 Cal./hr. x sq. cm x °C/cm)

Coverage

Wet Thickness* In. (mm)	Coverage per Gallon Sq. Ft. (sq. m)	Wet Weight Lbs./Sq. Ft. (kg/sq. m)
1/16 (2) 1/8 (3) 1/4 (6)	25.0 (2.3) 12.5 (1.2) 6.25 (0.58)	0.44 (2.1) 0.88 (4.3) 1.76 (8.6)

Specifications

Kinetics Damping Compound model KDC-E-162 shall consist of a visoelastic latex emulsion (vinyl base) vibration damping material for application on noise radiating surfaces to reduce the ringing noise due to shock or vibration to a deadened sound.

Model KDC-E-162 shall be non-asphaltic in nature, non-bleeding, and non-odor producing. When applied to a 10" x 10" x .035" (254 mm x 254 mm x 889 micron) panel of primed cold rolled steel at the rate of 0.5 lb/sq. ft. (2.5kg/sq. m) (dry weight) the material shall show no loss of adhesion when subjected to two 25 inch-pound (0.29 kg-M) impacts from a two inch (51 mm) diameter, 1-1/2 lb. (0.68 kg) steel ball at -20°F (-29°C).

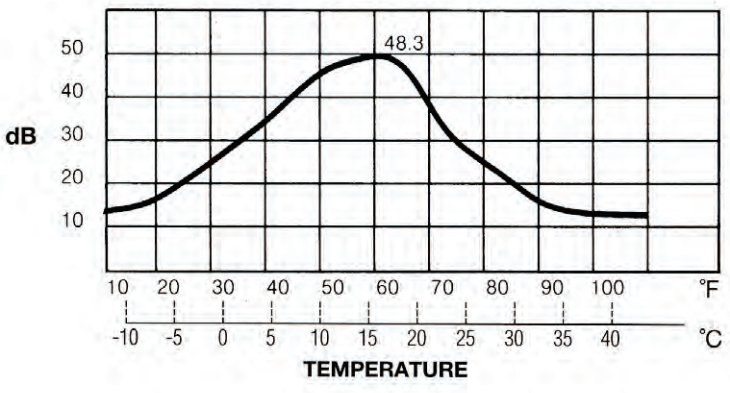
When tested under ASTM Specification E-162, model KDC-E-162 shall have a Flame Spread Index, IS of 0.59, and a Smoke Generation Mg of 0.1, and shall be termed as Fire Retardant under ASTM-D635-63 (will not support combustion) and be termed non-hazardous and non-toxic.

Damping efficiency shall be measured by the Geiger-Hamme Thick Plate Test Method, with a 48 dB per sec. decay rate at 60°F (16°C).

Damping Compound shall be Kinetics model KDC-E-162 as supplied by Kinetics Noise Control, Inc.

29 cont.

Decay Rate: The decay rate at 60°F (16°C) is 48.3 decibels per second at 0.50 lbs./sq. ft. (2.5 kg/sq. m) dry when tested according to Geiger-Hamme Thick Plate Method.



KINETICS Noise Control
kineticsnoise.com
sales@kineticsnoise.com
1-800-959-1229



DEREK WATRY

Technical Director

Since 1992, Derek has developed broad expertise across a range of practice areas, including rail and transit, environmental impact assessment, construction, forensic analysis, architectural acoustics, and industrial noise and vibration. He has conducted extensive field measurements, evaluated compliance with regulatory criteria, and performed detailed noise and vibration modeling across these sectors. Derek has prepared numerous technical studies and EIR/EIS sections under both CEQA and NEPA, contributing to high-profile projects across the United States.

Education

- M.B.A., Saint Mary's College of California, Moraga, California
- M.S., Mechanical Engineering, University of California Berkeley, Berkeley, CA
- B.S., Mechanical Engineering, University of California San Diego, San Diego, CA

Relevant Experience

VTA, Vasona Junction Extension SEIR, Santa Clara, CA
Provided a technical validation of the presumption that the noise and vibration study work conducted in 1999 for the entire Vasona LRT was still valid. Reviewed previous technical and environmental noise and vibration documents. Reviewed FEIR/FEIS significance criteria. Oversaw long-term noise measurements along the alignment.

VTA, Capitol Expressway Bus Rapid Transit (BRT) Update EIS, Santa Clara, CA
Reviewed previous BRT analysis and provided memo to support EIS.

Port of Grays Harbor T4 Expansion SEPA / NEPA, Aberdeen, WA
Conducted noise and vibration study for the expansion of a seaport in Washington state. Project elements included building new rail infrastructure – in particular, as number of turnouts and switches – relocating the cargo yard, and development of a new grain export terminal. The study assessed noise and vibration impacts under the Washington State Environmental Policy Act (SEPA) and the National Environmental Policy Act (NEPA).

Great America Waterpark Redevelopment EIR, Santa Clara, CA
Noise study to establish baseline/existing conditions, compared to Master Plan EIR documents, and provided noise control recommendations as needed.

Hotel Montgomery EIR, San Jose, CA
Peer review of technical analysis and EIR section.

Loch Lomond Marina EIR, San Rafael, CA
Examined traffic noise impacts on existing residences for the City of San Rafael. Provided the project with acoustical analyses and reports to satisfy the requirements of Title 24.

Mare Island Dredge and Material Disposal EIR/EIS, Vallejo, CA
EIR/EIS analysis of noise from planned dredged material off-loading operations for the City of Vallejo.

Mineta San Jose International Airport DEIR Review/Noise Monitoring, Santa Clara, CA
Provided expert review of noise section of DEIR for neighboring City of Santa Clara.

Patterson Ranch EIR, Fremont, CA
Conducted noise and vibration portion of the EIR.

Silva Ranch Annexation EIR, King City, CA
Conducted the noise portion of the EIR and assessed the suitability of the project areas for the intended development. Work included a reconnaissance of existing noise sources and receptors in and around the project areas, and long-term noise measurements at key locations.

Walmart EIR Noise Analysis Review, Atascadero, CA
Review and critique of EIR Noise Analysis for the Del Rio Road Commercial Area Specific Plan.

BART, San Francisco International (SFO) Airport Extension Environmental Compliance, San Francisco, CA
Environmental compliance monitoring of noise and vibration during cut-and-cover construction. Work included extensive ground university at buildings and structures near vibratory pile driving activity to ascertain compliance with construction specification limits.

30 cont.

Letter O4D

Traffic Engineering Services
In relation to a Review of Stadium Improvements at Rio Americano High School



Prepared for the Rio Americano Community Alliance. October 12, 2026

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REGISTERED PROFESSIONAL ENGINEER
GRANT P. JOHNSON
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Executive Summary

PRISM Engineering was retained by the Holder Law Group on behalf of the Rio Americano Community Alliance to review the various transportation related portions of the DEIR Transportation Section 4.4, Appendix E of DEIR (Local Transportation Analysis), Appendix F of DEIR (VMT Memorandum), and the Drone Analysis for existing conditions conducted by Grant Johnson, pertaining to traffic counts, parking counts, traffic flows, etc.

Some of the main points of this report include:

- **The VMT analysis understates the project's impact and should find it significant.** Kimley-Horn's VMT memo assumes attendance stays the same when games move from El Camino HS to Rio Americano. Their own LTA (Appendix E) assumes typical attendance rises 32%, from 1,669 to 2,200. Using the LTA's numbers with the memo's method, VMT goes up about 1,440 (+13%) instead of down 2,098. That fails the memo's own "any net increase" threshold, so the impact is significant. The memo also can't use the 230-daily-trip screening exemption, since the project generates about 2,510 trips. O4D-1
- **Project trip generation is too low.** It's based on ticket sales at El Camino, where parking is tight: 430 spaces and essentially no street parking. Rio Americano will have 672 on-site and 327 off-site spaces at night, plus new lights, 2,500 seats and a press box, so attendance will go up. The Rio/Jesuit game drew 3,397. Project trips should be at least about twice what was used, and the LOS analysis should be redone with the new numbers. O4D-2
- **The LOS analysis uses the wrong hour and assumes parking that doesn't exist.** The exhibits show 3:00–4:00 pm school-peak volumes, but the Synchro runs actually use lower 5:30–6:30 pm volumes. Ticket data shows fans actually arrive 6:30–7:45 pm. The analysis also sends 657 cars into Lots 4 and 5, which have only 371 spaces, leaving about 286 cars circling for parking that aren't accounted for. O4D-3
- **Mitigation at Saverien Dr./American River Dr. falls short, and a signal should be studied.** With Exhibit 5 volumes, this all-way stop runs at LOS F with 136 seconds of delay. Calling the change from LOS A to LOS D "nominal" isn't supportable. High-visibility crosswalks don't address heavy nighttime traffic. A signal would bring the intersection to LOS D and add lighting. O4D-4
- **The DEIR's assumptions don't match field data or local conditions.** Drone counts show only 23% of school traffic uses Saverien to the north, versus the DEIR's assumed 60%. Saverien's 5-foot parking strip next to a 5-foot bike lane means O4D-5

parked trucks would block the bike lane, so those spaces shouldn't count.

Graduation and other community events were left out of the VMT analysis.

O4D-5 (Cont.)

These are my findings in my review of the various reports pertaining to transportation for the Stadium Improvements Project.

A copy of my CV is found in Appendix B of this letter.



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DRONE Data Collection Summary

The following defines the results from a drone video compilation / documentation of school-day traffic that took place on April 17, 2026, a Friday, when school was in session. The drone was flown by Grant Johnson, a licensed and fully insured drone pilot. Two drones were flown in an overlap technique so that there is continual footage throughout the morning and continual footage for the afternoon period 2:30 pm to 4:30 pm. A wide variety of data beyond intersection counts can be gleaned from this footage, including parking lot fill rates, specific traffic jams, queues, etc.

1. ***Traffic Impacts at Intersections*** — O4D-6
   - Traffic impacts were considered in the DEIR for the pm peak hour of the school when students get out (3:00 pm to 4:00 pm). PRISM Engineering conducted their own traffic counts for am and pm peak hour time periods, found the pm peak hour to be the highest, and it was 3:00 pm to 4:00 pm.
2. ***Parking Lot Fill / Unfill motions, and overflow*** — O4D-7
   - The parking lot fills up just before the peak hour traffic begins to depart. The parking lot inventory at various 15-minute intervals is given in the last paragraph of Page 5 of this report. The overflow occurs on American River Dr. and holds approximately 100 cars, but these continue to have turnover, and there never was more than 100 cars.
3. ***Actual Carpooling head count per vehicle*** — O4D-8
   - The number used in the DEIR, seems like a reasonable assumption to use if the vehicle occupancy is assumed to be the same as a game at El Camino where the parking is very challenging. It would seem that once the games are played at Rio Americano High School with the new lights and bleachers, car-pooling will be less important to the majority of attendees for Rio Americano because there is no parking challenge. More people will drive.
4. ***Parking in neighborhood areas*** — O4D-9
   - The parking on local streets was documented as follows, every 10 minutes generally from 3:00 pm to 3:30pm , and then at 3:50 pm and 4:00 pm, for a total of six snapshots as shown in the following figure. It should be noted that the highest number of parked cars on American River Drive was 72 cars, and the lowest number was 4 in interval ending at 4:00 pm. See Figure 1 for details of these parking situations on American River Drive during the pm peak hour of school.
5. ***Any use of shuttles for parking, and where they come from*** — O4D-10
   - There were no shuttles, but two big school buses that were about half full.
   - School Bus Arrivals
     1. At 7 mins into 3rd interval (7:52 am) a School Bus arrived from Saverien (from north) and went into the school loop, *dropped off 15 kids*. Bus went out to EB American River Dr. at 7:59 am (took 7 minutes stopped in parking lot).

2. At 8:15 am another School Bus comes from American River Dr. on the west going EB, turns right and gets into the school loop. At 8:17 it parks also on the right side of the loop and *drops off 7 children*. At 8:20 bus also continues EB on American River Dr.

O4D-11



Figure 1. Parking On-street of School Related Vehicles, 10-minute intervals.

O4D-12

6. **Actual Trip Generation calculation. Comparison to ITE Rates used**

- The actual trip generation can only be estimated from real field data, because the Institute of Transportation Engineers does not have a trip rate for a *stadium with lighting and a press box, and bleachers for 2500 people at night*. The trip rate that exists for a public high school is given in the following Figure 2, but only for reference. It is based on Rio Americano's estimated size of approximately 2000 students.

O4D-12 (Cont.)

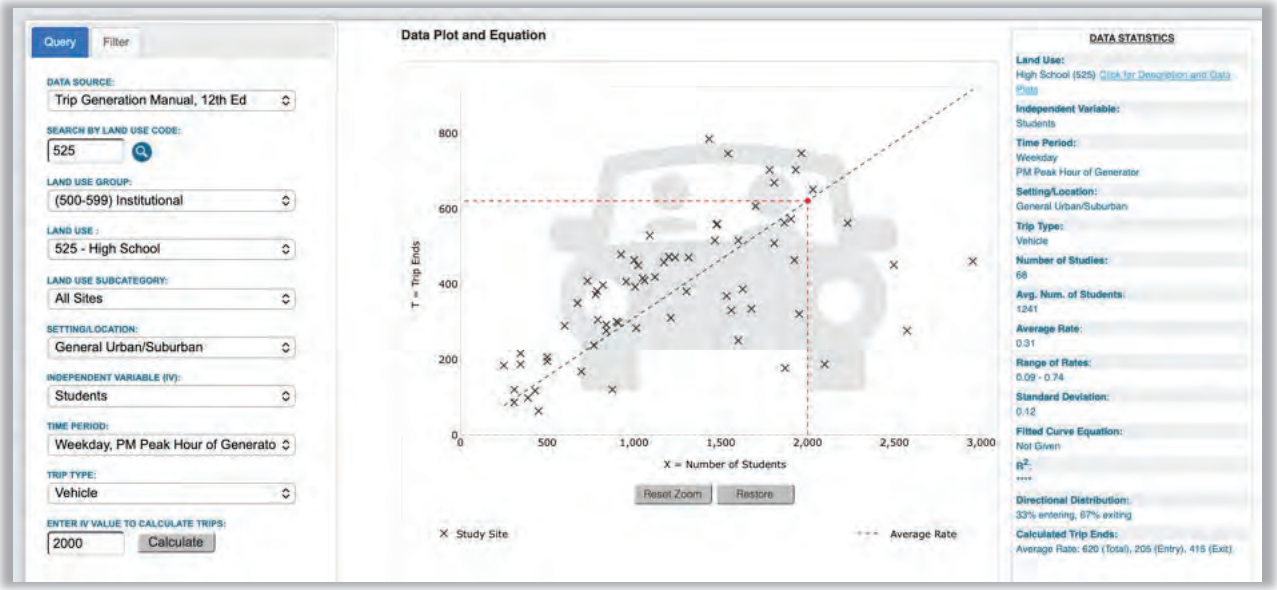


Figure 2. Trip Generation of Public High School, PM Peak of Generator (3-4pm)

Figure 2 shows that the volume of existing traffic that goes in and out of the Rio Americano campus is 205 inbound and 415 outbound cars. This is during an hour between 3 and 4 pm. The actual time of student checking out extends beyond this one-hour time period, but is not known.

O4D-12 (Cont.)

7. **Trip Generation of Home Game at Rio Americano High School.**
   - The trip generation of the Project is not known. However, there is some data available that gives some idea as to what is possible to achieve in terms of Trip Generation. The Kimley-Horn report guesses on the low side for trip generation of the project, and bases it on holding the games at a remote location, the El Camino campus location, where parking is very limited (430 spaces), and the venue cannot handle the large amounts of vehicles that would be possible at other campuses.

O4D-13

   - Appendix F (VMT Analysis) of the DEIR compares the maximum game at El Camino HS against the maximum game at Rio Americano HS: 3,301 at El Camino vs. 3,400 at Rio (a +3% in attendance). Appendix E of the DEIR (LTA), however, assumes that moving games on campus raises *typical* attendance from 1,669 to 2,200 (a huge +32% increase). Appendix F never makes the assumption that Appendix E made in assuming that on-campus games draw more people. I agree with the LTA.

O4D-14

- Running the methods and inputs in the Kimley-Horn VMT analysis using the Kimley-Horn LTA's (Appendix E) typical-game numbers, the VMT can be calculated for existing conditions to be ≈ 11,170 vehicle miles traveled. The Project's VMT on the other hand, located at the Rio Americano campus is ≈ 12,610, a net *increase* of about 1,440 VMT (+13%). That fails the VMT Analysis report of "any net increase" threshold as stated on p. 3 in that report: "*The proposed Project will have a significant transportation impact if there is a net increase in regional VMT compared to the existing, no Project, conditions*." With a 13% increase in the regional traffic volume, this becomes a *significant impact.* O4D-15
- In the VMT Analysis, the totals don't add up in the table (Table 3). For example, when you multiply for existing conditions, you have 1,185 vehicles x 5.8 mi + 212 vehicles x 12.8 mi you get 19,191 vehicle miles traveled. The report has 19,077 vehicle miles traveled. O4D-16
- In that same analysis in the VMT report, Table 2 is labeled as "round trip" and yet the numbers appear to be the distance for a one-way trip. O4D-17
- The VMT Analysis report states "*Based on Sacramento County Guidelines, new or redevelopment projects generating fewer than 230 daily trips may screen out from quantitative VMT analysis,*" and yet the Project's gross trips at the site are about 2,510, meaning that this project cannot screen out. O4D-18
- It should be noted that graduation ceremonies and other community events are not covered in the VMT analysis, although they should be. The VMT analysis covers football games only. O4D-19

8. **The Actual Existing Trip Distribution** of traffic is shown in Figure 3 below. In our comparison to those used in the study, we found that the DEIR assumed a heavily used pathway on Saverien Dr. at 60% for the project traffic. O4D-20

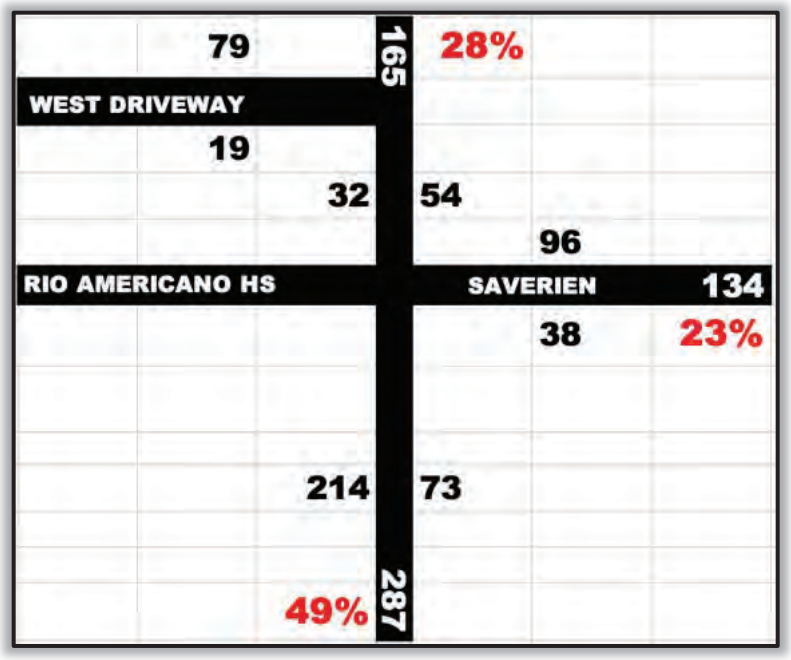


Figure 3. Trip Distribution of Actual School Traffic, 3-4 pm.

This was based on "existing patterns, district boundaries, engineering judgment," but not on any data. Our study showed this value to only be 23% based on the existing counts. This happened to be for the pm peak hour between 3 and 4 pm.

- Our study showed that the existing trip distribution of the Rio Americano High School campus, which we measured directly and found it to be very different at only 23% of the school traffic going to and from the north, 28% of the traffic to and from the west, and 49% to and from the east on American River Dr. in the pm peak hour from 3:00 pm to 4:00 pm. Figure 3 shows this trip distribution of the school at the pm peak hour. In the Kimley-Horn traffic count data for this intersection, their numbers were slightly different at 30% to the north on Saverien, 24% to the west, and 46% to the east on American River Dr.

O4D-20 (Cont.)

9. **Bicycle movements** onto and off of the campus.
   - In the am peak hour, 5 bikes arrived, and none left. Two more arrived in the non-peak hour.
   - In the pm peak hour, 3 bikes left to American River Dr., and none arrived. The American River Bike Trail adjacent to campus may have attracted some cyclists.

O4D-21

Parking -- Video Documentation of Results from Drone

- *LOT #4 has 195 spaces. LOT #5 has 176 spaces. Morning Peak Hour*
- LOT #4 is 5% full at 11 cars (7:15 am), LOT #5 is 2% full at 4 cars.

O4D-22

- LOT #4 is 60% full at 117 cars (7:59 am), LOT #5 is 34% full at 59 cars.
- LOT #4 is 100% FULL at 8:14 am, and LOT #5 is 92% FULL at 161 cars.
    - LOOP Road drop-off is busiest from 8:04 am to 8:26 am, about 20 minutes of very busy traffic.
- FIRST WAVE of Students get out: Starts at 2:41 pm with students walking out to parking lots, and it ends at about 2:47 pm. *Its then fairly quiet for about 50 minutes.*
- SECOND and LARGER WAVE of Students get out: Starts at 3:40 pm and goes to 3:52 pm. People are in a hurry to get out of there!
    - LOOP Road pick-up is busiest from 3:40 pm to 3:52 pm for about 12 minutes.

O4D-22 (Cont.)

Parking Inventory

- **2:30 pm**: LOT #4 is 80% full at 155 cars; LOT #5 is 88% full at 154 cars.
- **2:45 pm:** LOT #4 is 61% full at 125 cars; LOT #5 is 77% full at 135 cars.
- **3:00 pm:** LOT #4 is 51% full at 100 cars; LOT #5 is 69% full at 122 cars.
- **3:15 pm:** LOT #4 is 61% full at 125 cars; LOT #5 is 75% full at 131 cars.
- **3:30 pm:** LOT #4 is 72% full at 140 cars; LOT #5 is 82% full at 144 cars.
- **3:45 pm:** LOT #4 is 53% full at 105 cars; LOT #5 is 45% full at 80 cars.
- **4:00 pm:** LOT #4 is 43% full at 84 cars; LOT #5 is 30% full at 54 cars.
- **4:15 pm**: LOT #4 is 39% full at 77 cars; LOT #5 is 29% full at 52 cars.

O4D-23

COUNTS of CARS at MAIN INTERSECTION

O4D-24

Cars were counted on April 17, 2026 for the main intersection into Rio Americano High School on a Friday, between 2:30 pm and 4:30 pm. These counts were taken from the drone footage (April 17, 2026) a Friday when school was in session.

Table 1. PM Peak Hour Count at Intersection # 3.

File Name:	**PM HOURS**
Start Date:	Friday April 17, 2026
Start Time:	2:30 PM
End Time:	4:30 PM
Comment 1:	RIO AMERICANO HIGH SCHOOL
Comment 2:	American River Drive and Saverein Drive

	SAVERIEN DRIVE Southbound			AMERICAN RIVER DRIVE Westbound			RIO AMERICANO DRIVEWAY Northbound			AMERICAN RIVER DRIVE Eastbound				
Start Time	RT	TH	LT	RT	TH	LT	RT	TH	LT	RT	TH	LT		
2:30 to 2:45 pm	21	21	5	11	21	3	2	19	17	5	55	21	201	
2:45 to 3:00 pm	15	7	5	9	36	5	0	12	14	14	60	20	197	
3:00 to 3:15 pm	**16**	**17**	**13**	**6**	**30**	**5**	**0**	**2**	**4**	**6**	**60**	**34**	**193**	
3:15 to 3:30 pm	**19**	**25**	**11**	**22**	**109**	**7**	**1**	**8**	**5**	**10**	**47**	**17**	**281**	872
3:30 to 3:45 pm	**10**	**25**	**12**	**9**	**37**	**17**	**6**	**10**	**7**	**7**	**54**	**19**	**213**	884
3:45 to 4:00 pm	**16**	**29**	**24**	**19**	**38**	**13**	**19**	**18**	**25**	**6**	**62**	**11**	**280**	**967**
4:00 to 4:15 pm	10	7	9	9	43	3	0	15	8	8	54	16	182	956
4:15 to 4:30 pm	12	5	7	9	49	3	0	4	2	7	32	15	145	820
3:00 to 4:00 pm	**61**	**96**	**60**	**56**	**214**	**42**	**26**	**38**	**41**	**29**	**223**	**81**	**967**	

Source: PRISM Engineering

Table 2. PM Peak Hour Count at Intersection # 4A and # 4B

MAIN Parking Lot Exit

	RIO AMERICANO EXIT Northbound		
Start Time	RT	TH	LT
2:30 to 2:45 pm	20		6
2:45 to 3:00 pm	14		7
3:00 to 3:15 pm	**9**		**1**
3:15 to 3:30 pm	**4**		**1**
3:30 to 3:45 pm	**45**		**3**
3:45 to 4:00 pm	**71**		**5**
4:00 to 4:15 pm	18		3
4:15 to 4:30 pm	5		3
3:00 to 4:00 pm	**129**		**10**

SOLAR Parking Lot Exit

	AMERICAN RIVER DRIVE Westbound			RIO AMERICANO EXIT Northbound			AMERICAN RIVER DRIVE Eastbound		
Start Time	RT	TH	LT	RT	TH	LT	RT	TH	LT
2:30 to 2:45 pm	2		6	1		1	1		
2:45 to 3:00 pm	0		1	1		1	2		
3:00 to 3:15 pm	**3**		**1**	**0**		**0**	**0**		
3:15 to 3:30 pm	**4**		**0**	**0**		**0**	**2**		
3:30 to 3:45 pm	**7**		**16**	**0**		**0**	**0**		
3:45 to 4:00 pm	**3**		**42**	**3**		**3**	**1**		
4:00 to 4:15 pm	1		2	0		0	0		
4:15 to 4:30 pm	0		0	0		0	0		
3:00 to 4:00 pm	**17**		**59**	**3**		**3**	**3**		

Source: PRISM Engineering

TECHNICAL COMMENTS

1. METHODOLOGICAL DEFICIENCIES

- **The project volumes are only a fraction** of what they ought to be. Kimley-Horn makes the assumption in the VMT Analysis report that in the comparison between sites that everything is the same, that the games will merely move from their El Camino High School campus location 3 miles away to the home location at Rio Americano High School once the new stadium improvements are in place. The Kimley-Horn LTA had the assumption that that moving games on campus raises *typical* attendance from 1,669 to 2,200 (+32%). No explanation is given as to how this increase is to take place. It could be as high as the Rio/Jesuit game, 3,397 attendees. El Camino HS has only 430 onsite spaces compared to Rio Americano HS at 672, and has zero off-site street parking making it nearly impossible to have the same attendance as the Rio Americano location (*672 onsite and 327 offsite spaces, at night/after 4pm. There are "NO PARKING ANY TIME" signs with the time 8 am to 4 pm posted on both sides of American River Drive in the vicinity of the Rio Americano High School.*) O4D-25
- **Also, there are not as many spaces available** on surrounding streets for the El Camino High School, almost none. El Camino is a four-lane boulevard with NO STOPPING ANY TIME signs posted on both sides of that 40-mph boulevard, which also has a bike lane where parking might have been. The same is true for Eastern Ave., NO STOPPING ANY TIME signs posted throughout, and a bike lane where parking might have been. This four-lane boulevard fronts the west side of El Camino campus. There are nowhere near the same amount of on-street parking opportunities at the remote El Camino campus location, and so a comparison of the "same attendance" at both locations is not correct. This was the case with the VMT analysis for the Rio Americano High School, it was not a complete analysis. It was not an apples-to-apples match, but an orange-to-apples comparison. O4D-26
- **The peak hour does not match** with the hour of the project events at Rio Americano High School. This is a procedural error, one that was hard to pick up on. The report places the volumes of the existing pm peak hour of 3:00 pm to 4:00 pm shown in the report (*see Exhibit 2*). These are the highest volumes of the day. Yet the volumes used in the analysis were for the hour from 5:30 pm to 6:30 pm in the Synchro analysis sheets. It led this reader of the report reading the text and the numbers in Exhibits 2, 5 and 9 to believe that the volumes used in the report were higher than what was actually used. Indeed, the legend in this Exhibit 2 and the next Exhibit 5, and the next Exhibit 9 all showed the analysis volumes to be 5:30 pm to 6:30 pm in the legend, but the volumes in the exhibits were for the hours O4D-27

3:00 pm to 4:00 pm, giving the appearance that the analysis was conservative, but it was not meaningful in the analysis of Project traffic. One has to enter into the appendices to double check the numbers in the Synchro Analysis to realize this mistake.

O4D-27 (Cont.)

- **The Onsite Parking Cannot Be Achieved.** The project shows the following volumes that come into the Parking lot #4 and #5 in the hours from 5:30 to 6:30 pm. This is shown in Exhibit 4 of the report. The total is 82+82+41+41+411 which totals to a demand of 657 spaces for the inbound project volumes into Lot #4 and #5! *With only 371 spaces in Lots 4 and 5, there is no room for 657 cars as shown in the analysis. This is even assuming the lots were EMPTY to begin with.*

O4D-28

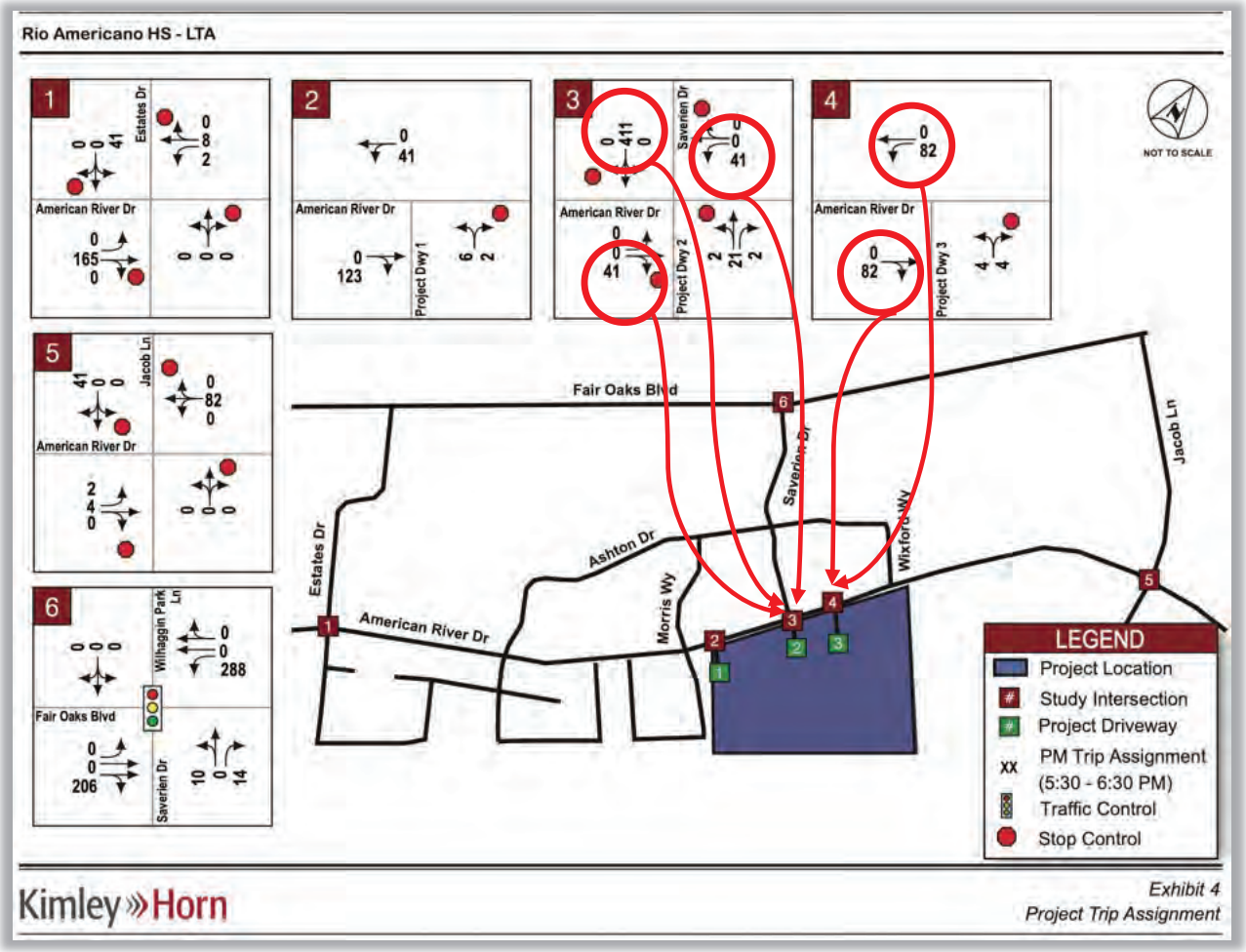


Figure 4. Project Traffic Entering the Rio Americano Lots at Int #3 and #4.

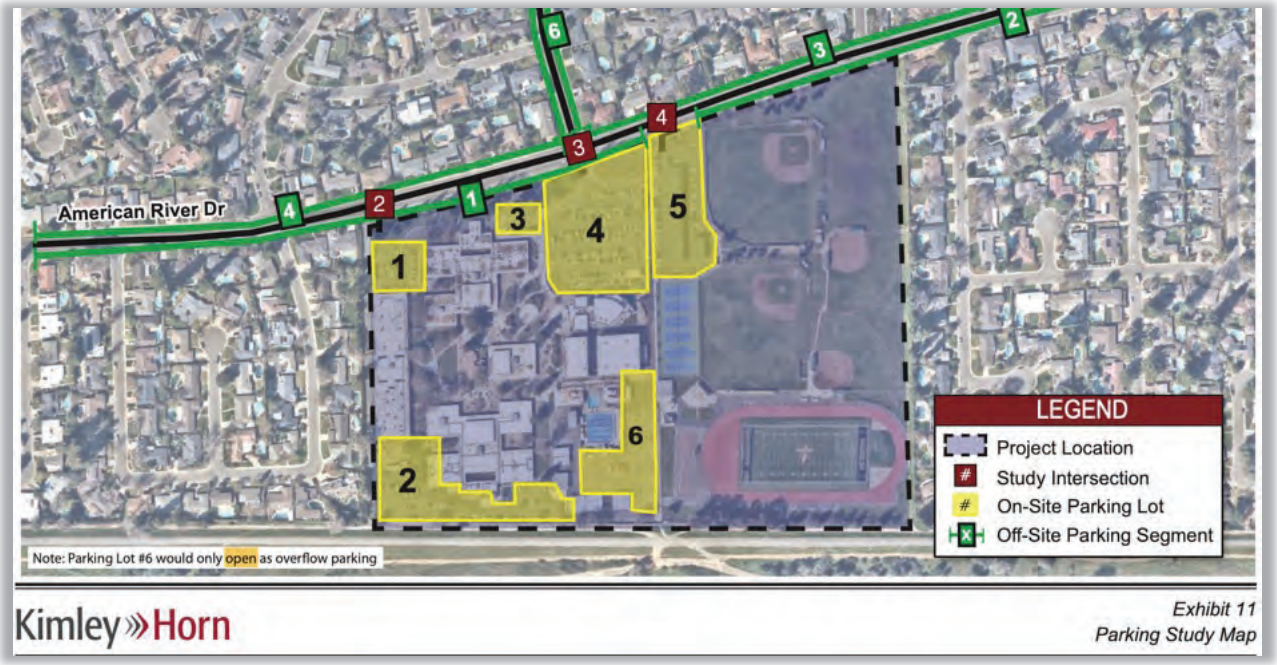
- The parking total in Lots #4 and #5 is only 371 spaces. The analysis numbers shows that 657 vehicles entered in. This is an impossible situation. The number of cars being "turned away" is 657 – 371 = 286 vehicles. This

O4D-29

is a lot of cars to be hunting for spaces (286) during the arrival of traffic, and the analysis did not account for this (all 657 came in).

- The analysis numbers showed that the remaining areas in Lots #1, #2, #3, and #6 have 301 spaces available. The analysis showed that 164 vehicles entered into Lots #1, #2, #3, and #6, with 137 spaces left unused (presumably in Lot #6 which is reserved for overflow parking).

O4D-29 (Cont.)



- 5:30 to 6:30 pm was the assumed arrival time assumed by Kimley-Horn, however, the ticket sales data for a game at El Camino show this arrival time taking place between the hours of 6:30 pm and 7:45 pm (LTA Attachment D (NDS vehicle occupancy survey, 6:30–7:45 p.m.). So this needs to be corrected.

O4D-30

- Here are the volumes from the analysis that show the volumes of the project plus existing conditions, at the intersection of Project Driveway / Saverien Dr. and American River Dr.:

O4D-31

Rio Americano HS - LTA
3: Project Dwy 2/Saverien Dr & American River Dr

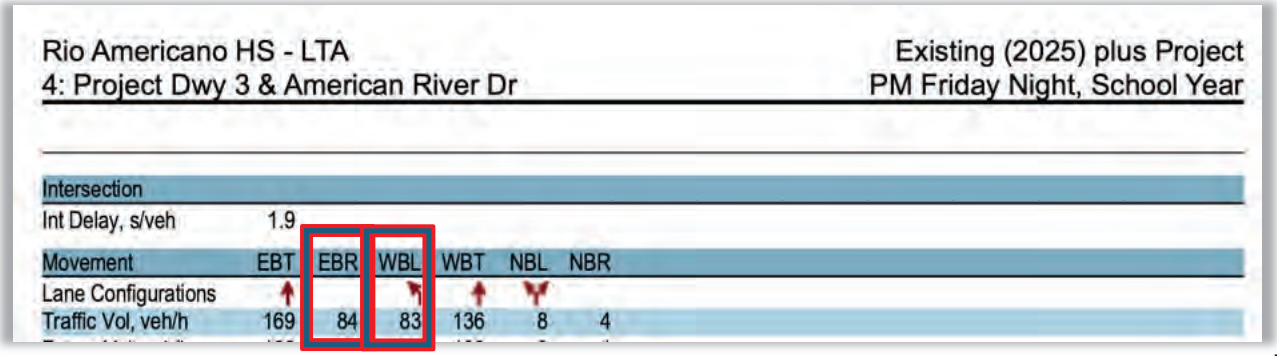
Existing (2025) plus Project
PM Friday Night, School Year

Intersection	
Intersection Delay, s/veh	34.7
Intersection LOS	D

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	33	145	49	42	115	26	10	39	5	25	423	28

- Note that the numbers going into the lot at the EBR, WBL, and SBT are 49, 42, and 423 which add up to 514 going in to LOT #4 (which has only 195 spaces but 514 cars coming in), but there is also the added project inputs from intersection #4, which shares this same space (LOT # 5 adds 176 spaces), but the amount of traffic coming in to this lot is 81+81=162 vehicles.

O4D-31 (Cont.)



Rio Americano HS - LTA — Existing (2025) plus Project
4: Project Dwy 3 & American River Dr — PM Friday Night, School Year

Intersection						
Int Delay, s/veh	1.9					
Movement	EBT	EBR	WBL	WBT	NBL	NBR
Lane Configurations	↑		↰	↑	↱	
Traffic Vol, veh/h	169	84	83	136	8	4

- The Kimley-Horn report suggested that the impacted intersection of American River Drive and Saverien Drive, which is an All Way Stop Control (AWSC) intersection, be mitigated by suggesting that the crosswalks be enhanced with "high visibility crosswalk markings," "parking restrictions on crosswalk approaches," etc. This is not sufficient because of the nighttime nature of this project, and there is no proof that people will walk to the game at night. Kimley-Horn states that the Federal Highway Administration (FHWA) merely suggests that these mitigations always be considered.

O4D-32

- **What was not considered was the installation of a traffic signal** at this location. This would facilitate the movement of high-volume traffic in much higher capacities, and handle a larger project volume. At night it will bring additional lighting (luminaires mounted to the tops of the corner mast arms) to the intersection. This location is operating at LOS D conditions with the project. It should be studied to see if it warranted for a traffic signal installation, which would make the movement of traffic through this intersection much easier. As it is shown in the peak hour of the project, there are 821 vehicles that enter the Rio Americano campus for the project assignment (see Exhibit 4).

O4D-33

- **Exhibit 5 showed the Existing 2025 plus the Project volume totals**. Doing a Synchro analysis on these numbers yielded LOS F conditions for the AWSC intersection, with 136 seconds of average delay. With a signal installed, this can be improved to LOS D. See Appendix A of this report for details on the Synchro Analysis. the volumes are those in LTA Exhibit 5 (school-peak counts plus game traffic). Without the output, we cannot rely on the result calculated from Exhibit 5 of the LTA. Yet, checking the Synchro analysis sheets in Appendix, I found that the volumes used in the analysis were different than those reported in Exhibits 2, 5 and 9. They were much lower, and this is because they actually represented the hour of 5:30 to 6:30 pm. Those volumes yield 34.7 seconds of average delay and also LOS D

O4D-34

conditions for the existing AWSC intersection. This error needs to be checked. O4D-34 (Cont.)

- **The LTA in the DEIR curiously says** of the Intersection #3 at Saverien and American River Drive, that going from an LOS A condition without the project to an LOS D condition with the project, is a "nominal" increase. I would say this is a *significant* increase, and according to the report create an average of 34.7 seconds of delay for every single vehicle that passes through this intersection. O4D-35

2. UNSUPPORTED ASSUMPTIONS

- "***Based on existing ticket data***" is the basis used to come up with the trip generation for the project. What is not known is how will the trip generation increase with the location of the game venue changing to the Rio Americano High School campus? These ticket sales were based on the condition of a remote stadium (that does not have the same conditions being analyzed for the project) that would include lights, an expanded bleacher seating (2500 seats), and an improved press box. The ticket sales will even be higher than those at the El Camino campus, as a result of these improvements being made at Rio Americano, and as a result of the more favorable parking condition (with the exception of Saverien Drive which has limited width for parking). It will also be higher as a result of the football games not being played at the El Camino High School campus anymore, which was a limited parking event venue (430 spaces), both onsite and the lack of street parking for miles in each direction of the campus. O4D-36
- **Rio Americano High School Stadium VMT Analysis.** How is it that the daily trips go down or the VMT goes down when you have this project, a major stadium upgrade, which adds to the activities and the capabilities that will exist at the existing Rio Americano High School? This needs to be explained in a way that the ordinary person can understand. The VMT model does not appear to be sensitive to the many unique parameters that might be missing from the model. O4D-37
- Table 3 of that report has the estimated vehicle trips for existing conditions set at 1,397 trips, while the project conditions with the new activities in the stadium set at a lower 1,255 trips. That's a 10% decrease! It seems just the opposite of this would happen, that the project will add more traffic to the site. This could be because the trip rate was set as exactly the same, an unsupported assumption, when the trip rate will go up for all Rio Americano games. Won't the stadium attract more to come from faraway places, and won't it cause *even more* Rio Americano High Schoolers and their families to support the football games, now that they can have a place to sit? Along with the much shorter drive? Surely the trip rate will go up from the existing condition. O4D-38
- "**The project is expected to have a Less than significant VMT impact."** This comes following a paragraph in the "Findings" section of the VMT memo that reads "*Football games held at El Camino High School are* O4D-39

anticipated to produce 19,077 total VMT. Football games held at the proposed Rio Americano High School stadium are anticipated to produce 16,980 VMT. The change in VMT between the existing and proposed project conditions is a net ***reduction*** *of 2,098 VMT.*" It seems that the attendees of the Rio Americano High School football games, now that they can attend their local campus, will have far more participants/spectators and even more visitors than they ever did when using the external El Camino campus about 3 miles away. O4D-39 (Cont.)

- **Using numbers from the DEIR LTA, however, assumes that moving games on campus raises *typical* attendance** from 1,669 to 2,200 (+32%). The VMT analysis does not have the assumption that on-campus games draw more people. This is inconsistent. It is believed that the project does constitute an increase to the attendance. This should be reflected in the VMT analysis, because it was included in the LTA. O4D-40
- With the excitement of new stadium lighting, press box improvements, increased bleacher capacity with 2,500+ seats, traffic will go up from where it was at El Camino High School. O4D-41
- It seems that the VMT analysis therefore has a fatal flaw in it. It will actually increase in proportion to the congestion that will take place at the Project location. People looking for parking, such as the 821 vehicles looking for parking on campus, these will circle around and around until they find a space off-site. What happens in air quality impacts within the vicinity of Rio Americano High School, especially with all of the traffic moving slow, polluting the air, looking for parking. The traffic coming at 6 to 9 pm will be an *addition*. O4D-42

3. ANALYTICAL OMISSIONS

- **The VMT Analysis report needs to have an increase** in the Project Trip Generation for the Rio Americano stadium improvements, because based on the assumption that ticket sales on another campus (El Camino) which has limited parking (430 spaces), is not going to be an apples-to-apples comparison to the Rio Americano location which has 672 spaces. It is a flawed analysis based on the assumption that everything is the same between the two locations. O4D-43
- Actually, more people from Rio Americano will be more excited to go to these games played at the new stadium with lighting and adequate seating at the Rio Americano campus location, their *own* location. How come these positive factors were not considered in the analysis? O4D-44
- **The parking limitations at the El Camino campus (430 spaces)** needs to be addressed in the VMT analysis, before this is a comparable VMT analysis. It should be noted that there are NO STOPPING ANY TIME signs posted for more than a mile in each direction of El Camino Ave. from Eastern Ave. In both directions of Eastern Ave. from El Camino Ave. the same is true, NO STOPPING ANY TIME signs posted for a distance of more than one mile. This essentially cancels all on-street parking opportunities O4D-45

for the El Camino Campus, leading to other methods of parking or alternative transportation. At any rate, it was not addressed in any way in the report, and must be addressed to know the true comparison of VMT and LOS results. O4D-45 (Cont.)

4. **INCONSISTENCIES WITH CEQA OR LOCAL STANDARDS**
   - **The VMT will go up, if the analysis is done correctly.** It will not go down by over 2,098 vehicle miles traveled as stated in the VMT Analysis prepared by Kimley-Horn (see Table 3, Net Change in VMT in the Project column). The limited parking at the El Camino campus (430 onsite spaces, and none on El Camino or Eastern) will not be comparable to the vastly larger parking at the Rio Americano campus (672 spaces), and the wide two-lane streets that have more parking (327) compared to the El Camino campus, which has nearly no parking on El Camino Ave. or Eastern Ave. (NO STOPPING ANY TIME signs are posted throughout these sections of these two streets). O4D-46
   - **Even still, the Rio Americano off-site parking is inadequate**, because Kimley-Horn counted the spaces on Saverien Drive which has bike lanes on both sides of the road, and a narrow five-foot space for parking next to a five-foot bike lane. I measured these dimensions using Google Maps, accurate for planning purposes. If a truck with mirrors parks in this skinny parking space along Saverien Dr., it is 95.7 inches wide (truck has total width of 8 feet) it will block the bike lane. This means that the truck will occupy the bike lane, it being only 5 feet out from the parking area. The bike lane will be reduced from 5 feet wide to only 2 feet wide, and this is unacceptable. O4D-47
   - The parking counted for Saverien Dr. in the Kimley-Horn report needs to be reduced because many vehicles parking along the bike lanes will render these bike lanes unusable during the games. O4D-48
5. **RECOMMENDED ADDITIONAL ANALYSES** O4D-49
   - **It is recommended that the VMT analysis be redone** to account for the major differences that take place at the two campuses. The VMT analysis is more forgiving being next to commercial shopping areas, as opposed to being within a completely residential development (like Rio Americano is). The El Camino campus is surrounded by an urban mix of land uses including commercial /retail along El Camino Ave and Eastern Ave. Commercial establishments exist within a quarter mile in each direction of the El Camino campus. These are four lane boulevards that have NO STOPPING ANY TIME signs posted for over a mile in each of the four directions from the campus. There is *no parking possible on the streets* to lead into the El Camino campus for a mile in each direction. The campus of the Rio Americano High School on the other hand is all residential, and the roadways allow for parking in the evening time (prohibited from 8 am to 4 pm) on American River Drive.
   - **It is recommended that the LOS Analyses be redone** with the increase in Project Trip Generation for each scenario, which should not be based on the attendance at El Camino, but a fair estimate of what will happen in the O4D-50

neighborhood of Rio Americano High School because there is more on-site parking (672), and much more on street parking on the streets that directly front the high school (327 at night). It is a vastly improved situation, and will result in higher attendance at the games. In the report, the estimate that is most appropriate is the game between Rio Americano and Jesuit which had 3,397 attendees (complimentary + band), a vast increase in the number used in the report. The Kimley-Horn report in the DEIR LTA uses 2,200 for a general event (the 1,669 average x 1.32) and 3,400 for the conservative event. O4D-50

- **It seems logical that the attendance at the new Rio Americano home games are being under-reported.** It is not appropriate to use the lowest numbers possible (such as the attendance at El Camino in the year 2024). The largest trip generation that is possible should be used, because if the game between Rio and Jesuit really had 3,397 attendees, how is this possible with only 430 spaces? The lighting for nighttime play is a plus. It will be able to attract more attendance. O4D-51
- **The LOS Analysis will need to be retooled** with the updated numbers for the project, and should use the appropriate peak hour time period (to coincide with the time of the arrival). It is anticipated that the project trip generation should increase approximately at least two times the value used, to reflect the Rio/Jesuit game that attracted 3,397 attendees. It should be remembered that the "home" games played at the El Camino campus were constrained (only having 430 parking spaces on-site). They were limited on parking offsite severely. It was also not as attractive as having your own campus. The playing of the game between Jesuit and Rio at the El Camino campus in the fall of 2025 (August 29, 2025) is a good example of the power of the attraction of the big game, even when it is played in a highly constrained location. O4D-52
- **How the attendees got to this game is a mystery**, because the information in the DEIR's LTA shows the ticket sales as 3,397 on 8/29/25, and the NDS data shows that on the same day, 564 vehicles came in, and they were carrying an average of 2.36 people per car. This equals 1331 people. This does not equate to 3,397 tickets sold. Attachment D is not explained with Attachment C. O4D-53

Appendix A. Synchro Calculations

HCM 7th AWSC
3: Rio American HS Driveway/Saverien Dr & American River Dr 10/06/2026

Intersection	
Intersection Delay, s/veh	136
Intersection LOS	F

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Vol, veh/h	103	243	72	98	239	98	31	101	35	42	535	65
Future Vol, veh/h	103	243	72	98	239	98	31	101	35	42	535	65
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Heavy Vehicles, %	2	2	2	2	2	2	2	2	2	2	2	2
Mvmt Flow	112	264	78	107	260	107	34	110	38	46	582	71
Number of Lanes	1	1	0	1	1	0	0	1	1	0	1	0

Approach	EB	WB	NB	SB
Opposing Approach	WB	EB	SB	NB
Opposing Lanes	2	2	1	2
Conflicting Approach Left	SB	NB	EB	WB
Conflicting Lanes Left	1	2	2	2
Conflicting Approach Right	NB	SB	WB	EB
Conflicting Lanes Right	2	1	2	2
HCM Control Delay, s/veh	32.7	36.6	18	301.3
HCM LOS	D	E	C	F

Lane	NBLn1	NBLn2	EBLn1	EBLn2	WBLn1	WBLn2	SBLn1
Vol Left, %	23%	0%	100%	0%	100%	0%	7%
Vol Thru, %	77%	0%	0%	77%	0%	71%	83%
Vol Right, %	0%	100%	0%	23%	0%	29%	10%
Sign Control	Stop	Stop	Stop	Stop	Stop	Stop	Stop
Traffic Vol by Lane	132	35	103	315	98	337	642
LT Vol	31	0	103	0	98	0	42
Through Vol	101	0	0	243	0	239	535
RT Vol	0	35	0	72	0	98	65
Lane Flow Rate	143	38	112	342	107	366	698
Geometry Grp	5	5	5	5	5	5	4b
Degree of Util (X)	0.367	0.089	0.271	0.766	0.256	0.81	1.599
Departure Headway (Hd)	10.502	9.637	10.388	9.691	10.324	9.581	8.248
Convergence, Y/N	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Cap	344	374	348	377	350	381	447
Service Time	8.202	7.337	8.088	7.391	8.024	7.281	6.262
HCM Lane V/C Ratio	0.416	0.102	0.322	0.907	0.306	0.961	1.562
HCM Control Delay, s/veh	19.2	13.3	16.9	37.9	16.5	42.5	301.3
HCM Lane LOS	C	B	C	E	C	E	F
HCM 95th-tile Q	1.6	0.3	1.1	6.2	1	7.1	39.3

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This is calculated from Exhibit 5 numbers from DEIR LTA.

HCM 7th Signalized Intersection Summary
3: 10/12/2026

Movement	EBL	EBT	EBR	WBL	WBT	WBR	NBL	NBT	NBR	SBL	SBT	SBR
Lane Configurations												
Traffic Volume (veh/h)	103	293	72	89	239	98	31	101	35	63	535	65
Future Volume (veh/h)	103	293	72	89	239	98	31	101	35	63	535	65
Initial Q (Qb), veh	0	0	0	0	0	0	0	0	0	0	0	0
Lane Width Adj.	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Ped-Bike Adj(A_pbT)	1.00		1.00	1.00		1.00	1.00		1.00	1.00		1.00
Parking Bus, Adj	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Work Zone On Approach		No			No			No			No	
Adj Sat Flow, veh/h/ln	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870	1870
Adj Flow Rate, veh/h	112	318	78	97	260	107	34	110	38	68	582	71
Peak Hour Factor	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92	0.92
Percent Heavy Veh, %	2	2	2	2	2	2	2	2	2	2	2	2
Cap, veh/h	142	393	333	116	376	319	80	259	291	69	589	560
Arrive On Green	0.08	0.21	0.21	0.07	0.20	0.20	0.18	0.18	0.18	0.35	0.35	0.35
Sat Flow, veh/h	1781	1870	1585	1781	1870	1585	436	1412	1585	195	1666	1585
Grp Volume(v), veh/h	112	318	78	97	260	107	144	0	38	650	0	71
Grp Sat Flow(s),veh/h/ln	1781	1870	1585	1781	1870	1585	1849	0	1585	1861	0	1585
Q Serve(g_s), s	5.6	14.6	3.7	4.9	11.7	5.2	6.2	0.0	1.8	31.4	0.0	2.7
Cycle Q Clear(g_c), s	5.6	14.6	3.7	4.9	11.7	5.2	6.2	0.0	1.8	31.4	0.0	2.7
Prop In Lane	1.00		1.00	1.00		1.00	0.24		1.00	0.10		1.00
Lane Grp Cap(c), veh/h	142	393	333	116	376	319	339	0	291	658	0	560
V/C Ratio(X)	0.79	0.81	0.23	0.84	0.69	0.34	0.42	0.00	0.13	0.99	0.00	0.13
Avail Cap(c_a), veh/h	142	393	333	116	376	319	339	0	291	658	0	560
HCM Platoon Ratio	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00	1.00
Upstream Filter(I)	1.00	1.00	1.00	1.00	1.00	1.00	1.00	0.00	1.00	1.00	0.00	1.00
Uniform Delay (d), s/veh	40.9	34.0	29.7	41.8	33.5	31.0	32.7	0.0	30.9	29.1	0.0	19.8
Incr Delay (d2), s/veh	34.9	16.4	1.6	47.8	10.0	2.8	3.9	0.0	0.9	32.3	0.0	0.5
Initial Q Delay(d3), s/veh	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
%ile BackOfQ(50%),veh/ln	3.8	8.3	1.5	3.7	6.2	2.2	3.1	0.0	0.8	19.2	0.0	1.1
Unsig. Movement Delay, s/veh												
LnGrp Delay(d), s/veh	75.8	50.4	31.4	89.6	43.5	33.8	36.6	0.0	31.8	61.3	0.0	20.3
LnGrp LOS	E	D	C	F	D	C	D		C	E		C
Approach Vol, veh/h		508			464			182			721	
Approach Delay, s/veh		53.1			50.9			35.6			57.3	
Approach LOS		D			D			D			E	

Timer - Assigned Phs	2	3	4	6	7	8
Phs Duration (G+Y+Rc), s	20.6	10.4	23.5	36.0	11.7	22.2
Change Period (Y+Rc), s	4.0	4.5	* 4.5	4.0	4.5	4.0
Max Green Setting (Gmax), s	16.6	5.9	* 19	32.0	6.7	18.2
Max Q Clear Time (g_c+I1), s	8.2	6.9	16.6	33.4	7.6	13.7
Green Ext Time (p_c), s	0.5	0.0	0.5	0.0	0.0	0.8

Intersection Summary	
HCM 7th Control Delay, s/veh	52.5
HCM 7th LOS	D

Notes
User approved pedestrian interval to be less than phase max green.
* HCM 7th computational engine requires equal clearance times for the phases crossing the barrier.

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Add a signal, get LOS D for Jesuit Plus Project Volumes.

Appendix B. Grant Johnson, TE, Resume/CV

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(Coint.)

Principal, Project Manager/Engineer



Grant Johnson is a Principal Engineer of PRISM Engineering. He is a registered Traffic Engineer in the State of California (TR#1453). He has been a leader in traffic engineering and transportation planning for 40 years. He has extensive experience in site inspections for expert witness cases in several western US states: CA, HI, UT, AZ, WA, as well as for US DOJ. He spent 2.5 years doing high-level transportation and traffic engineering while living in China with his family. He also worked in leadership capacity as the Chief Site Engineer on a 70 km section of Bullet Train construction connecting Beijing to Shenyang. He has an international experience in traffic engineering that enhances his experience in the US. More recently Grant has been involved in numerous expert witness cases for accidents involving Traffic Engineering expertise. His creative perspective and keen eye for traffic safety comes from practical hands-on experience in the field, as well as a thorough understanding of design and safety principles contained in the MUTCD, AASHTO Green Book, and State Highway Design Manuals.

Total Experience

40 Years

Professional Registration

Licensed Traffic Engineer
in the State of California
TR #1453



Grant has much experience in traffic engineering and transportation planning services including multi-modal corridor studies, intersection design including signal design, traffic operations analysis, micro-simulation of traffic. In addition, extensive experience in travel demand modeling, report writing, transportation master plans, public presentations. He was Chief Site Engineer over 70 km of China's bullet train construction connecting Beijing to Shenyang while supervising work over hundreds of engineers and construction workers.

Expert Witness as a Traffic Engineer

A wide variety of Expert Witness cases involving:

- ►examination of all roadway and traffic conditions,
- ►examining traffic control device installations for compliance to MUTCD standards,
- ►measuring vehicle sight distance,
- ►vehicle speeds,
- ►traffic patterns.

Recent cases involve:

1) Nighttime trucking accident at major food company distribution center, poor lighting in truck parking lot.

Education

California State University, Sacramento
BS Civil Engineering
1984

Professional Affiliations

Institute of Transportation Engineers (ITE)

American Public Works Association (APWA)

Plaintiff against Corporation. For Plaintiff against Corporation.

2) Car/motorcycle accident at industrial park large intersection with some sight distance constraints and alleged lane striping deficiency. For Defense of City.
3) Vehicle hits Cattle herd crossing AZ State highway at night. No fences, no lights, horizontal and vertical curves. For Plaintiff versus AZ State DOT.
4) Truck overturn accident on improperly designed and negligently maintained county highway. For Plaintiff against CA county.
5) Sight distance issues on neighborhood collector / arterial intersection. Wall, bushes, and roadway design. For plaintiff against CA City.
6) Vehicle hit by Light Rail, signal dispute. For Defense of CA City controlling signals, signs.
7) Signal Timing issue on Expressway w/Car/Car fatality. For Plaintiff Defense of Driver and finding liability on CA city.
8) UT State highway and pedestrian fatality on sidewalk. Design flaws. Safety flaws. Lighting. Improper TCDI installations. For Plaintiff versus driver and UT State DOT.
9) Railroad crossing W/Ped fatality, skewed intersection. For Defense of City.
10) High school X-Walk w/severe Ped injury, Sight distance. Defense of City.
11) Absence of guardrail and motorist run off freeway fatality. For Plaintiff versus CA State DOT.
12) Motorcycle run off freeway offramp, alleged poor design. For Defense of CA DOT.
13) Absence of sufficient guardrail, vehicle plunges into dry canal, fatal. For Plaintiff versus CA DOT
14) Multiple close signals near freeway ramp w/Ped fatality hit by semi-truck turning into X-Walk. For Defense of City.
15) Pedestrian killed in crosswalk. Alleged signal timing deficiency. Sun glare. For Plaintiff against CA City.
16) Motorcycle ran off road, hit utility pole. For Defense of local CA Utility Company.
17) Motorcycle fatality in construction zone. For Defense of Contractor and Temporary Traffic Control plan sheets.

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Partial List of Recently Completed Cases (*alphabetized*):

- Arcadia, CA, Liu v. Alhambra Motors, Ped/Car/X-Walk
- Antioch, CA, Nartea v Sabedra, Car hits Skateboarder at Traffic Signal
- Arizona Grand Canyon, AZ, PARTHASARATHI v. STATE OF ARIZONA & UNITED STATES. Car hits Cow, Head-on Car
- Calaveras County, CA, Bowser vs Reed, Car/Ambulance fatality, sun was factor in sight distance

- Dixon, CA, Glenda Dew vs Caltrans, Head-on, fatal
- Emeryville, CA, Abad vs City, Fatal truck accident in Xwalk
- Fairfield, CA, Coppes v CALTRANS
- Fort Duchesne, UT US vs Austin, Construction Zone Temporary Traffic Control, Signage improperly installed.
- Fresno, CA, Paulino vs Jensen/Car hits long truck crossing two close spaced intersections
- Harriman, UT, High speed fatality on Utah DOT expressway, signal dilemma zone, sight distance
- Harriman, UT, Hancock v Holbrook, Car hits Pedestrian
- Honolulu, HI, Farrington Hwy, hit fixed obj., no guardrail
- Honolulu, HI, Farrington Hwy, Ped killed in crosswalk, poor lighting, mistakes in roadway design work.
- Hollywood, CA, Babak vs Grace & Frankie, Car/Truck
- Lancaster, CA, Romines vs Lancaster/Broadside fatality
- Laguna Hills, CA, John Doe vs Orange County Fire Authority/Fire Truck hits car at signal, high speeds
- Los Angeles CALTRANS vs Blanca Cavazos Motorcycle/Car
- Manteca, CA, Roundabout: Motorcycle fatal accident
- Manteca, CA, School Ped/Car accident in X-Walk
- Marin County, CA, CALTRANS Pino vs State, Car/CHP
- Marin County, CA, Goralka, Speed and Stopping sight distance on Panoramic Highway
- Marin County, CA, Rosenthal vs Johnson, Bike/Car accident @ Four Corners intersection
- Martinez, CA Daniel Nall vs CALTRANS, Motorcycle/Car
- Modesto, CA, Bernal vs Mendez, City, County, CALTRANS
- Newport Beach, CA, Heyer v Sosa, Broadside Car at Signal
- Oakley, CA, Vancil vs City, Bike/Car
- Pittsburg, CA, Sandoval vs City, Guardrail: Run off road
- Richmond, CA, Melida Diaz, RR Xing Ped/Train fatality
- Richmond, CA, Sakura Sims vs City, Ped/Car at X-Walk
- Richmond, CA, Jones & Randall, Motorcycle/Truck
- Richmond, CA, Ms Norma Supapo, Ped/Car fatality at unmarked intersection, sight distance issues
- Rocklin, CA, Googooian vs Anastasia, Car/Car stop sign
- San Francisco, CA, MICHAEL GUERRERO v MILESTONE CONTRACTORS, Truck hits Scooter at Signal
- San Bernadino County, CA, Tufesa USA v Rafael Guerrero Serratos, Carpool Van veers off freeway at night, fatality.
- San Rafael, CA, Ketron vs City, Ped/Car at X-Walk
- San Rafael, CA, Zaslavski vs City, Ped/Truck fatality
- Riverside County, CA, Penelope v Caltrans/Riverside County, Motorcycle hits Car on Highway intersection
- Temecula, CA, Romero vs Kimco/Parking Lot Accident
- Turlock, CA, Sederquist vs Turlock/Flooding Accident
- Vacaville, CA, Glenda Dew vs State of CA, Ped/Car
- Washington State, U.S. Department of Justice, FBI car

O4D-54 (Coint.)

- West Jordan, UT, Fair vs Flake, Chick-Fil-A, Construction Zone accident (broadside, two cars) Signal/Obstruction

O4D-54 (Coint.)

Traffic Engineering Experience

- Sacramento, CA, Safety Study and Alternatives Analysis for Heritage Oaks Hospital at I-80 Offramp at Auburn Blvd. Numerous accidents.
- Marin County, CA, On-Call Engineering Services contract w/Public Works
  - Panoramic Highway intersection design layout.
  - US 101/SR 131 Interchange Traffic Operations Study.
- Santa Rosa, CA, major traffic study and traffic engineering recommendations.
- Shasta Lake, CA, Radar Speed Surveys in, 52 locations, TE Stamp.
- City of Watsonville traffic engineering investigations relating to school traffic, trains, and safety of students, safe routes to school.
- Chico, CA, SR 99/Eaton Rd Interchange Traffic Operations Study.
- City of Pasadena traffic engineering study investigating peak traffic, bus ridership, and level of service (LOS) methods (errors in process, wrong results).
- Vallejo, CA, Charter School innovative mitigations, Travel Demand Management.
- Chongqing, China, Trip Generation Survey LongHuXiYuan: Peds, Taxi, Cars.
- Chongqing, China Parking Study YueLai Conference Center: Freeway level incoming traffic flows to massive parking areas.
- NCTC, Nevada County, CA, On-Call Traffic Engineering Studies.

Transportation Planning Experience

- City of Santa Rosa Habit Burger Traffic Impact Analysis, 15 intersections.
- Vacaville, CA, On-Call Traffic Engineering Services Contract, Traffic Study.
- Fairfield, CA, Travis AFB residential development Traffic Studies.
- Marin County, CA, Planning Dept., Alta Way Residential Traffic Report.
- Vallejo, CA, Charter School Traffic Impact Study.
- Chongqing, China, YueLai Newtown VISSUM Traffic Model Development.
- Vacaville, CA, Leisure Town Bypass, Traffic Model Alternatives.
- Los Banos, CA, Citywide TRANSCAD Model Development, 600 zones
- Los Banos, CA, Transportation Master Plan
- NCTC, Nevada County, CA, On-Call Transportation Planning.

Project Management

Chief Site Engineer in Liaoning Province in China over Engineering Inspection. Had "Stop Order" authority for 70 km of China's bullet train construction of tunnels, bridges, viaduct, foundations, piers, towers, and stations. Oversaw manufacturing of concrete, rebar, and quality control. All-Mandarin environment.

Letter O4E

EXHIBIT E

Index of Source Documents and Supporting Materials

Compiled by Candice Heinz, Environmental Scientist, for the Rio Americano Community Alliance

Comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH No. 2026010094)

October 16, 2026

O4E-1

This index identifies the documents and records that support the Rio Americano Community Alliance's ("RACA") comments on the Draft EIR and that supplement the reports of RACA's experts (Exhibits A through D) and the other exhibits to RACA's comment letter. They include the source documents for the chronology at Exhibit F.

Each document that is publicly available is identified by its URL and is incorporated by reference into RACA's comments. RACA requests that the District consider each document listed below and include it in the administrative record for the Project (Pub. Resources Code, § 21167.6, subd. (e)). Documents marked "Attached" are not publicly posted, and copies are attached to this exhibit. Documents that are available upon request have been withheld to reduce comment volume. Documents marked "District files" have been reviewed and are also available upon request. Web addresses were current as of October 15, 2026.

The "Comment letter" column refers to the sections and footnotes of RACA's comment letter. Personal information has been omitted from the emergency-incident records (items 26 to 28).

n	cument	te	mment letter	L or location
History of the athletic facilities at Rio Americano High School				
	e Clearinghouse (CEQAnet) record for SCH No. 2005072119, Rio Americano High School Outdoor Sports Facility Upgrades: Mitigated Negative Declaration (received July 20, 2005), Notice of Preparation (Jan. 14, 2010), Draft EIR (Mar. 29, 2010) and Notice of Determination (June 2010).	5–2010	; II.G; fns. 7–8	s://ceqanet.lci.ca.gov/Project/2005072119
	emptory Writ of Mandate, Friends and Neighbors of Rio v. San Juan Unified School District, Sacramento County Superior Court Case No. S00495.	. 29, 2008		ilable upon request.
	Juan Unified School District, Draft Environmental Impact Report, Rio ericano High School Outdoor Sports Facility Upgrades (AECOM).	r. 29, 2010	;	rict files
	Juan Unified School District, Final Environmental Impact Report, Rio Americano High School Sports Facility Upgrades, including Letter 7 (Save the American River Association, Apr. 20, 2010) and Response 7-3, pp. 2-18 -19, and Chapter 4, Mitigation Monitoring and Reporting Program.	e 3, 2010	.1–2	rict files
	Juan Unified School District Board of Education, CEQA Findings and Statement of Overriding Considerations, Rio Americano High School Outdoor Sports Facility Upgrades Project (1,400 seats).	e 2010	; II.G; III.H	rict files
	ision of the State Architect project records for Rio Americano High School, Application Nos. 108404, 108618, 108005, 102339, 114649, 085, 116663, 116970 and 117197.	7–2026	; II.B; III.H (item 7)	rict files
	Juan Unified School District Board of Education, agenda and minutes of Dec. 12, 2017, and Notices of Exemption for the 2018 track-and-field jects at Rio Americano High School.	. 12, 2017	; II.B	rict files

	ument		ment letter	or location
	Sacramento Bee, "This Sacramento-area high school's football field won't open on time — thanks to some birds"; see also CapRadio, "Nesting Shorebirds Block Sacramento Area High School From Using New Turf ."	6 and Apr. 8, 2019	.4	//www.sacbee.com/news/local/article228898164.html https://www.capradio.org/articles/2019/04/08/nesting-shorebirds-block-sacramento-area-high-school-from-using-new-turf-field/
	uan Unified School District, Facilities Master Plan materials: Rio Americano High School Facility Master Plan and Facility Condition ssment (Mar. 27, 2024), and 2014–2024 Facilities Master Plan.	–2024	II.D; III.H (item 7); IV (item 2)	ct files
	rials from the May 8, 2024 community outreach meeting on stadium ovements at Rio Americano High School.	8, 2024		ct files
he District's current process and public statements				
	uan Unified School District, Stadium Improvement Community Meeting materials, Rio Americano High School.	13, 2025	II.B	ct files
	uan Unified School District Facilities Committee, "Rio Americano High School Stadium Improvements" (AECOM presentation on environmental scoping).	4, 2025	III.H	ct files
	uan Unified School District, EIR Scoping Meeting materials, Rio Americano High School Stadium Improvements Project.	7, 2026	II.F	ct files
	uan Unified School District, "Stadium Improvements at Rio Americano High School" (project webpage).	eved [date]		//www.sanjuan.edu/riostadium
	il from San Juan Unified School District stating hardscape and softscape removal areas for the visitor and home sides of the stadium.	5, 2026		ct files; available upon request
ell tower				
	e of Neighborhood Meeting, Public Safety Towers wireless communications facility at Rio Americano High School (San Juan Unified School District, Western Fire Chiefs Association and Public Safety Towers,).	2025 (meeting May 15, 2025)	II.H	ct files
	uan Unified School District Board of Education, Resolution No. 4212 and staff report attachments (ground lease with Public Safety Towers,).	10, 2025		ct files
	nd Lease Agreement, Site SACR02, between San Juan Unified School District and Public Safety Towers, LLC (excerpts: cover, signature pages, Exhibit B, sheet A-4).	24, 2025	; III.H	ct files
	il from San Juan Unified School District to Lisa Phenix regarding the cell tower (Resolution No. 4212, categorical exemptions, and County zoning).	6, 2026		ct files;
esuit High School and other cumulative projects				
	ty of Sacramento, Jesuit High School Stadium Lighting (PLNP2021-00262): Planning Commission agenda packet for Mar. 11, 2024 (staff report and conditions of approval, including Condition 17); Board of Supervisors agenda packet for the June 4, 2024 appeal hearing; and project page.	11 and June 4, 2024	III.D; III.H (item 10)	//agendanet.saccounty.gov/CountyPlanningCommission/Documents/ViewDocument/COUNTY_PLANNING_COMMISSION_MEETING_8830_Agenda_Packet_3_11_2024_5_30_00_PM.pdf?meetingId=8830&documentType=AgendaPacket&itemId=0&publishId=0&isSection=false https://agendanet.saccounty.gov/BoardofSupervisors/Documents/Downloadfile/BOARD_OF_SUPERVISORS_8775_Agenda_Packet_6_4_2024_9_30_00_AM.pdf?documentType=5&meetingId=8775&isAttachment=True http://planning.saccounty.gov/us/en/planning-environmental-review/projects/current-planning/jesuit-high-school-stadium-ng.html

O4E-1 (Cont.)

m	cument	te	mment letter	RL or location
	unty of Sacramento, Jesuit High School Stadium Lighting Project Draft EIR (SCH No. 2022100645), including the M. Neils Engineering lighting study (2023); and Jesuit High School Stadium Lights, Actual Lighting Utilization 2024–2025 (annual report, PLNR2025-00117).	23–2025	; III.A; III.H (item 10)	s://pers.saccounty.net/Documents/Jesuit%20High%20School%20Stadium%20Lighting/Jesuit%20Stadium%20Lighting%20DEIR.pdf https://ceqanet.lci.ca.gov/2022100645 http://planning.saccounty.gov/content/dam/cd/planning/archive-docs/projects/current-planning/jesuit/PLNR2025-00117%20Jesuit%20Stadium%20Lights%20Actual%20Lighting%20Utilization%202024-2025.pdf RL for the M. Neils Engineering study, if separately posted]
	uit High School Sacramento, "Jesuit High School Sacramento Announces Historic Transition to Co-Divisional Education Model" (female students to enroll beginning fall 2027).	t. 5, 2025	H (item 10)	s://www.jesuithighschool.org/news/2025-10-05/jesuit-high-school-sacramento-announces-historic-transition-to-co-divisional-education-model
	S. Army Corps of Engineers, American River Common Features, Comprehensive SEIS/SEIR, Lower American River Contract 3B: Site 4-2, p. 3-70, and Figure 3.5.2-5.	y 2025	B; III.H (item 11)	s://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/_ARCF%20Final%20SEIS-SEIR%20Document%2009MAY25.pdf?ver=LG0SUUZjm7tJTWNXyKZiFA%3D%3D
The American River Parkway and the Lower American River				
	S. Department of the Interior, Approval for Inclusion in the National Wild and Scenic Rivers System as State Administered Components (including "[t]he Lower American from Nimbus Dam to its junction with the Sacramento River"), 46 Fed. Reg. 7484 (Jan. 23, 1981); National Wild l Scenic Rivers System, American (Lower) River.	. 23, 1981; retrieved [date]	B.5	s://rivers.gov/apps/sites/rivers/files/2022-10/north-coast-rivers_FRN%20Vol.46%20No.15.pdf https://www.rivers.gov/river/american
	unty of Sacramento, American River Parkway Plan (2008), including the Rio Americano area plan and Policies 3.3, 5.27.1(w), 7.19, 7.19.1, 7.19.2, 7.22.1, 7.23, 7.24, 9.24.1, 10.27 and 10.28.	08	; III.B.5; III.E; III.F	s://regionalparks.saccounty.gov/Parks/Documents/Parks/ARPP06-021909_sm.pdf
	cerpt from Parkway Plan regarding the Rio Americano Area	08	3	ached
	cell Map for adjacent County-owned parcel (APN 292-021-0031-0000	c. 30, 2020	3	ached
Emergency-response records				
	ramento Regional Fire/EMS Communications Center, incident records for 4540 American River Drive, Jan. 1, 2024 – Sept. 16, 2026 (redacted), h transmittal letter.	duced Sept. 25, 2026	D (emergency access)	ailable upon request
	CA, public records request for the incident records in item 28.	t. 16, 2026	D	ailable upon request
	nmary of the 50 emergency incidents at Rio Americano High School, Feb. 7, 2024 – Sept. 16, 2026, prepared by Candice Heinz from the records in item 28 (date, time, general location, incident category, and dispatch and ival times).	t. 12, 2026	D	ached (aggregate information only)

O4E-1
(Cont.)

I compiled this index from the public records and other sources identified above. To the best of my knowledge, each attached copy is a true copy of the document described.

Candice Heinz)/16/2026

Candice Heinz Date

O4E-1
(Cont.)

ACTIVITIES AND FACILITIES

The Gristmill Access area is primarily used by hikers, anglers, rafters, and boaters. A cobblestone bar, which is accessible by vehicle, protrudes into the river. This area provides a convenient takeout for rafters, as well as a good car top launching area for fishing boats. The site is also used by equestrians. An equestrian/hiking trail begins at Howe Avenue and terminates a short distance upstream from Gristmill, making the area a popular rest stop. Hikers enjoy the varied terrain and vegetation, as well as the many isolated waterfront areas in the vicinity. Current development of the site is limited to trash cans, portable restrooms and an informal unpaved parking area.

The Gristmill Access Area, primarily designated as Protected Area, is appropriate for some limited development to accommodate less intensive recreational use may be permitted. However, due to the sensitivity of the surrounding riparian habitat and its associated wildlife, the area is not appropriate for large scale activities. A primitive picnic area comprised of scattered family picnic tables could be installed adjacent to the parking lot, but barbecue facilities shall not be installed except in open areas where fire hazard is minimal. Turf and other landscaping which requires irrigation shall not be installed within any areas vegetated by oak trees. Drinking fountains and permanent restroom facilities may be installed near the parking area.

Rio Americano Area

LOCATION AND DESCRIPTION

The Rio Americano area includes the portion of the SARA Park area that is north of the river. The northern boundary is adjacent to predominantly single family residential neighborhoods and Rio Americano High School.

The Rio Americano Area is characterized by two distinctly different vegetative groups. The northerly portion is predominantly grassland. It is through this area that the bicycle trail is constructed. The southerly portions of the river bank are dense in riparian vegetation. An equestrian/hiking trail winds its way through this area. A string of islands mark historic channels of the river. These islands create a habitat for many land animals, as well as protected lagoon and wetland areas for waterfowl. This wetland/lagoon area should remain undeveloped and protected.

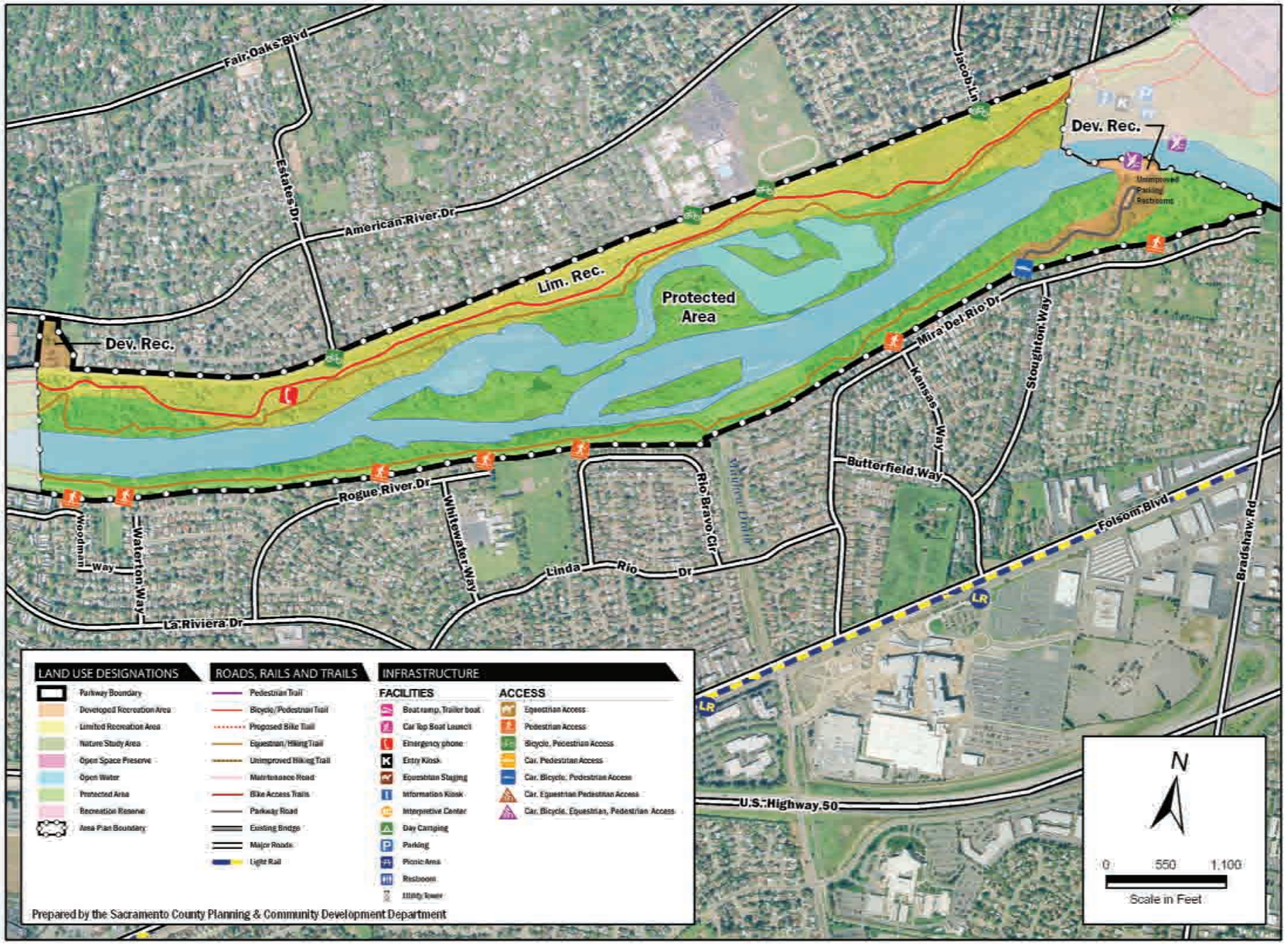
ACTIVITIES AND FACILITIES

There is no public vehicular access to the Rio Americano area. Four designated bicycle access points provide ingress and egress for nearby residents. Occasional rest stops with picnic tables and trash cans are located along the river near the trails. Otherwise, the area is undeveloped.

The potential for future development in the Rio Americano Area is limited. Although it is within the Developed Recreation land use category, the area is constrained by a lack of vehicular access, proximity to residences, sensitive riparian habitat, and a limited availability of large areas of land that would be suitable for developed recreation. In light of these constraints, the most logical location for developed recreation would be the large grassland field, upstream from Rio Americano High School. Vehicular access could be obtained by way of the Harrington access, but any development of recreational facilities must be sensitive to potential disturbance to nearby residences. Furthermore, this area is identified as an "Oak Grassland Restoration area", indicating the desire to reestablish the Oak-grassland biotic community. Any development or use of this area must be consistent with this intent.

SARA PARK

O4E-1
(Cont.)



DISCLAIMER: ASSESSORS PARCELS ARE FOR TAX ASSESSMENT PURPOSES ONLY AND DO NOT INDICATE EITHER PARCEL LEGALITY OR A VALID BUILDING SITE. THE COUNTY OF SACRAMENTO ASSUMES NO RESPONSIBILITY ARISING FROM USE OF THIS INFORMATION.

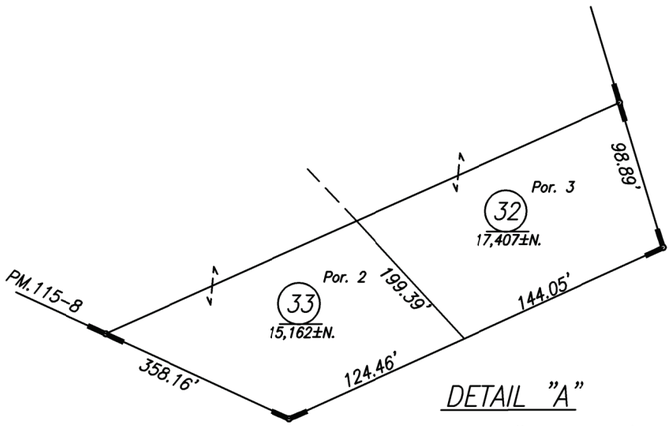
Item 27

POR. SEC'S. 58 & 59, RANCHO DEL PASO

292–21

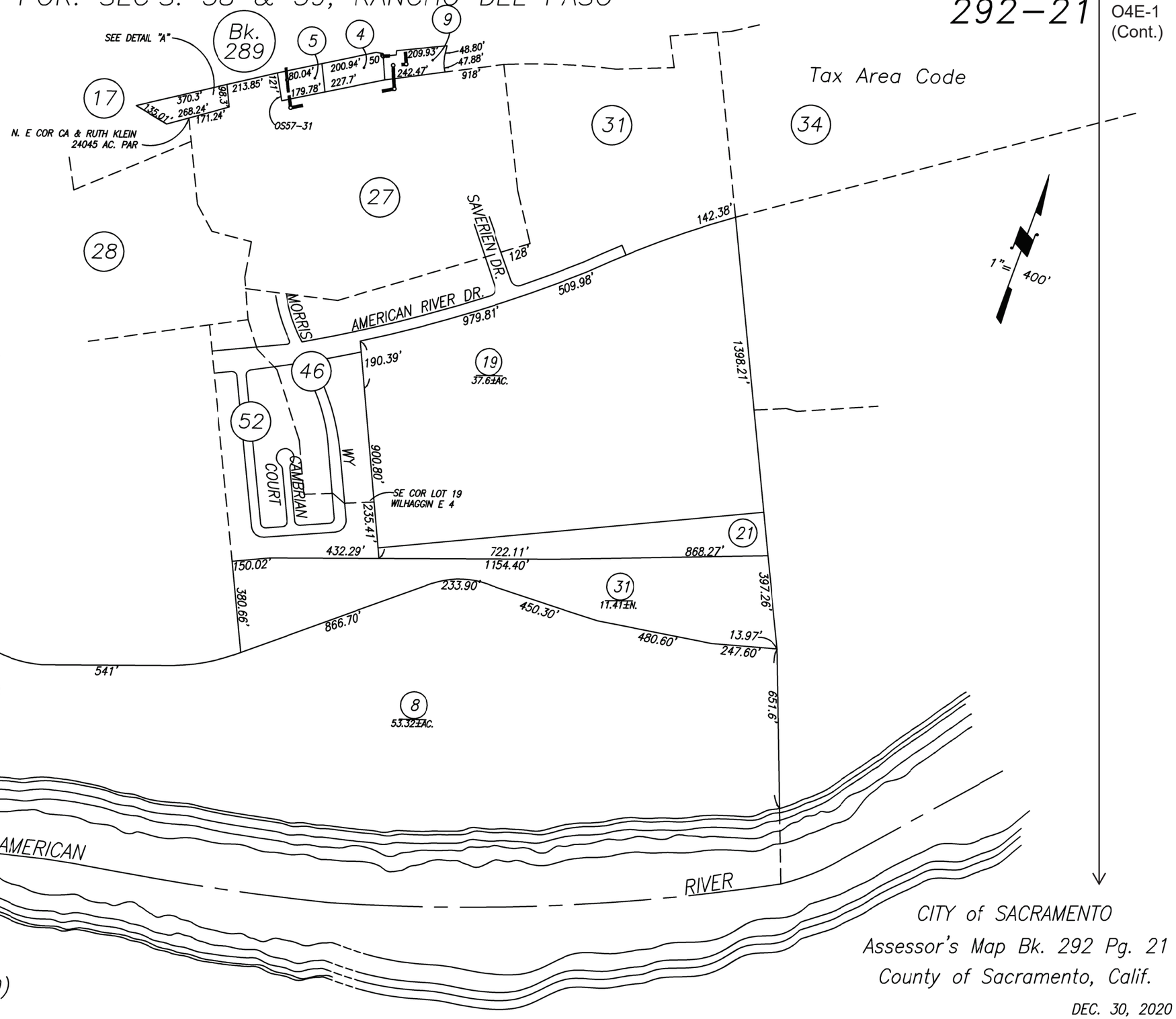
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Tax Area Code



DETAIL "A"

SCALE: 1" = 100'



CITY of SACRAMENTO
Assessor's Map Bk. 292 Pg. 21
County of Sacramento, Calif.

DEC. 30, 2020

Por Record of Survey O.S. Bk. 57, Pg.31(1–28–99)

EXHIBIT E, ITEM 30

Summary of Emergency Incidents at Rio Americano High School
February 7, 2024 – September 16, 2026

Prepared by Candice Heinz, Environmental Scientist, for the Rio Americano Community Alliance
Comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH No. 2026010094)
October 16, 2026

O4E-1
(Cont.)

1. Source

I prepared this summary from the incident records that Sacramento Regional Fire/EMS Communications Center produced to the Rio Americano Community Alliance ("RACA") on September 25, 2026, in response to RACA's public records request of September 3, 2026 (Exhibit E, items 26 and 27). The records consist of a 79-page report titled "4540 American River Dr ^ 1.1.24-9.16.26_Redacted." The report covers January 1, 2024 through September 16, 2026. It lists 50 incidents at Rio Americano High School, 4540 American River Drive, between February 7, 2024 and September 16, 2026, each with its own incident number. The agency's transmittal letter states: "Enclosed please find, the non-exempt records responsive to your request."

For each of the 50 incidents, the table in Part 3 gives the date, the time of the call, the general location, the incident category, and the dispatch and arrival times, as recorded in the report.

2. How the table was prepared

- **Times.** "Call time" is the time the call was received. "Dispatch" is the report's dispatch (DSP) timestamp, and "Arrival" is its on-scene (ONS) timestamp. Where more than one unit responded, the table uses the incident-level arrival time.
- **Response time** is the interval from dispatch to arrival, in minutes. It does not include the time between the call and the dispatch. Two incidents have no dispatch or arrival time: in one, the caller declined service and the call was cancelled (no. 30), and in the other, no unit was dispatched (no. 33).
- **Evening.** Shaded rows in Part 4 are incidents with a call time of 5:00 p.m. or later (or before 6:00 a.m.).
- **Location** is the general location given in the report. Room numbers are omitted.
- **Categories.** Each incident is assigned to one category based on the report's description:
  - **Fire alarm:** Activation of the school's automatic fire alarm system.
  - **Medical emergency:** Illness or a medical condition of a student, staff member or visitor, such as fainting, an allergic reaction, a seizure, or a person found down.
  - **Athletic injury:** Injury during a sport, a physical education class, or play on an athletic field or court.
  - **Traffic collision:** Collision on the street in front of the school, at its entrance, or in a parking lot, including one involving a bicyclist and one single-vehicle motorcycle accident.
  - **Fire:** A reported fire or visible smoke and flames.
  - **Injury (non-athletic):** A fall or other injury not connected with athletics.
  - **Assault:** An altercation resulting in an injury.

- **Other:** A report of an animal in a parked vehicle; responders found no problem.

- **Privacy.** The agency redacted personal information before producing the report. This summary also omits names, ages, addresses, telephone numbers, and medical details. Medical incidents are described only by category.

O4E-1
(Cont.)

3. Summary

The report lists 50 incidents over 952 days (about 31 months), or about one every 19 days on average.

egory	idents	l at or after 5:00 p.m.
alarm	17	1
dical emergency	15	4
letic injury	7	3
ffic collision	5	1
	2	2
ry (non-athletic)	2	0
ault	1	0
er	1	1
al	**50**	**12**

- **Timing.** Twelve incidents were reported at or after 5:00 p.m. Ten of them were reported between 5:06 p.m. and 9:21 p.m. The other two were the fires, reported at 11:23 p.m. (near the levee, no. 46) and 12:33 a.m. (in a parking lot, no. 10). Six of the ten evening incidents were at athletic facilities: the football field or stadium (2), the soccer fields (2), the pool (1), and near the gym (1).
- **Athletic injuries.** Seven incidents were athletic injuries. Three were reported in the evening (nos. 23, 40 and 49), and two involved a blow to the head (nos. 30 and 43).
- **Response times.** Units were dispatched to 48 of the 50 incidents. The average time from dispatch to arrival was 6.84 minutes, and the median was 6.6 minutes. Times ranged from 3.55 to 10.73 minutes. Arrival took more than 8 minutes after dispatch in 11 incidents and more than 10 minutes in 3 (nos. 15, 28 and 34, all fire alarms).
- **Responding units.** The report lists the responding units for each incident. Unit E110 responded to 42 of the 48 incidents to which units were dispatched.

4. Incidents

.	te	y	ll time	neral location	tegory	patch	rival	sponse in.)	ident no.	port ges
	/2024	d	7 PM	npus (not specified)	e alarm	7:55 PM	3:06 PM	5.18	4025854	1
	5/2024	u	0 AM	rse's office	sault	2:40 AM	0:16 AM	7.60	4031086	2–3
	2/2024	e	6 PM	otball field	dical emergency	8:26 PM	4:18 PM	5.87	4048275	4–5
	0/2024	d	2 PM	ssroom building	e alarm	2:28 PM	6:55 PM	4.45	4066976	6
	3/2024	e	5 AM	nt office (injury during PE class)	letic injury	8:05 AM	4:51 AM	6.77	4075613	7–8
	3/2024	e	16 PM	npus (not specified)	e alarm	16:42 PM	20:15 PM	3.55	4075710	9
	8/2024	e	1 PM	rary	ury (non-athletic)	5:16 PM	3:01 PM	7.75	4099256	10–11
	4/2024	i	6 PM	king lot	ffic collision	0:38 PM	7:10 PM	6.53	4111378	12–14
	/2024	n	7 PM	king lot	ner (animal welfare ck)	1:59 PM	0:08 PM	8.15	4129073	15
	1/2024	d	33 AM	king lot	e	35:30 AM	43:08 AM	7.63	4144801	16
	5/2024	u	2 PM	m	dical emergency	5:08 PM	1:09 PM	6.02	4155320	17–18
	7/2024	e	3 PM	rse's office	dical emergency	5:46 PM	4:27 PM	8.68	4177759	19–20
	8/2024	d	20 AM	npus (not specified)	e alarm	20:52 AM	27:47 AM	6.92	4178294	21
	3/2024	u	5 PM	rse's office	dical emergency	8:14 PM	3:54 PM	5.67	4188561	22–23
	9/2024	d	49 AM	npus (not specified)	e alarm	49:41 AM	00:06 PM	10.42	4192773	24
	16/2024	d	5 AM	npus (not specified)	e alarm	5:36 AM	3:20 AM	7.73	4197230	25
	17/2024	u	4 AM	npus (not specified)	e alarm	4:35 AM	0:40 AM	6.08	4197887	26
	18/2024	i	5 AM	ool entrance, American River ve	ffic collision (bicyclist)	8:37 AM	7:34 AM	8.95	4198490	27–28
	22/2024	e	43 AM	sketball courts	letic injury	45:50 AM	54:29 AM	8.65	4201346	29–30
	22/2024	i	30 PM	npus (not specified)	e alarm	31:27 PM	36:15 PM	4.80	4221739	31
	3/2024	e	7 PM	rse's office	dical emergency	9:36 PM	7:56 PM	8.33	4229021	32–33
	3/2024	e	7 PM	npus (not specified)	e alarm	8:10 PM	4:38 PM	6.47	4229101	34
	6/2024	i	1 PM	cer field	letic injury	3:21 PM	1:49 PM	8.47	4231304	35–36
	9/2024	n	9 PM	npus (not specified)	e alarm	9:49 PM	6:26 PM	6.62	4233207	37
	10/2024	e	5 AM	npus (not specified)	e alarm	5:57 AM	2:35 AM	6.63	4233746	38
	4/2025	i	29 AM	ssroom building	ury (non-athletic)	32:39 AM	36:30 AM	3.85	5016510	39–40
	/2025	n	54 AM	npus (not specified)	e alarm	54:18 AM	59:47 AM	5.48	5023712	41
	/2025	i	00 AM	npus (not specified)	e alarm	00:27 AM	10:35 AM	10.13	5026610	42
	7/2025	u	5 AM	table classroom near pool	dical emergency	8:45 AM	5:49 AM	7.07	5040467	43–44
	1/2025	e	4 PM	ar baseball field	letic injury			—	5048643	45
	9/2025	d	04 AM	npus (not specified)	e alarm	04:33 AM	09:20 AM	4.78	5053705	46
	/2025	d	5 PM	ministration office	dical emergency	6:52 PM	4:53 PM	8.02	5062867	47–48
	3/2025	n	2 PM	eet in front of school	ffic collision otorcycle)			—	5070294	49
	2/2025	e	41 AM	npus (not specified)	e alarm	41:50 AM	52:34 AM	10.73	5076049	50
	/2025	u	1 PM	ssroom building	dical emergency	3:05 PM	8:51 PM	5.77	5087035	51–52
	3/2025	i	04 AM	npus (not specified)	e alarm	04:59 AM	12:39 AM	7.67	5097305	53
	/2025	i	3 PM	king lot, American River Drive	dical emergency	5:48 PM	1:51 PM	6.05	5107302	54–55
	5/2025	n	03 AM	ministration office	dical emergency	05:40 AM	10:36 AM	4.93	5161397	56–57
	/2025	n	28 AM	rary	dical emergency	32:34 AM	37:29 AM	4.92	5170811	58–59
	/2025	e	7 PM	otball stadium	letic injury	9:36 PM	8:13 PM	8.62	5171725	60–61

O4E-1 (Cont.)

·	te	y	ll time	neral location	tegory	patch	rival	sponse in.)	ident no.	port ges
	15/2025	d	1 PM	ar gym	dical emergency	3:10 PM	9:23 PM	6.22	5195928	2–63
	6/2025	u	0 PM	ol area	dical emergency	3:09 PM	0:31 PM	7.37	5210458	4–65
	/2026	u	4 PM	ar soccer field	letic injury	6:22 PM	4:22 PM	8.00	5023897	5–67
	7/2026	e	8 PM	eet in front of school	ffic collision	8:48 PM	5:24 PM	6.60	5050746	3–69
	8/2026	d	6 AM	king lot	dical emergency	7:47 AM	2:45 AM	4.97	5051256	0–71
	0/2026	i	23 PM	ar levee	e	26:19 PM	33:34 PM	7.25	5053247	72
	/2026	u	8 AM	eet in front of school	ffic collision	0:59 AM	7:35 AM	6.60	5066136	3–74
	9/2026	d	6 PM	mpus (not specified)	e alarm	6:33 PM	2:40 PM	6.12	5079784	75
	/2026	d	1 PM	ying field, American River Drive ld not specified)	letic injury	3:20 PM	0:29 PM	7.15	5124286	5–77
	6/2026	d	8 PM	ssroom building	dical emergency	0:16 PM	6:32 PM	6.27	5177913	3–79

O4E-1 (Cont.)

— No dispatch or arrival time recorded (no. 30: caller declined service and the call was cancelled; no. 33: no unit dispatched).

5. Certification

I prepared this summary from the records described in Part 1. To the best of my knowledge, it accurately reflects the information in those records.

'andice Heinz _____ /16/2026

Candice Heinz — Date

EXHIBIT F

Rio Americano High School Athletic Facilities: Chronology of Improvements and Environmental Review, 2005–2026

Compiled by the Rio Americano Community Alliance from public records, August 2026; revised October 2026

O4F-1

This chronology summarizes the San Juan Unified School District's planning, environmental review, and construction of athletic and related facilities at Rio Americano High School (RAHS) from 2005 through the public review period for the Draft EIR for the current Stadium Improvements Project. Each entry cites the record on which it is based. Bracketed numbers refer to the Sources list that follows the table, and page numbers follow the bracketed number where a source has them.

Date	Event	Source
2005		
2005	At the request of the American River Sports Association and the RAHS booster organization, the District first considers upgrades to RAHS sports facilities.	[1] p. 1
July 20, 2005	The State Clearinghouse receives an initial study/mitigated negative declaration (MND) for the Rio Americano High School Outdoor Sports Facility Upgrades Project (SCH No. 2005072119).	[1] p. 1; [2]
2006		
January 2006	The District approves the project and adopts the MND.	[1] p. 1
April 2006	Friends and Neighbors of Rio challenges the approval (*Friends and Neighbors of Rio v. San Juan Unified School District*, Sacramento County Superior Court Case No. 06CS00495).	[1] p. 1
2006–2008		
Before December 29, 2008	In reliance on the MND, and before the court's judgment, the District completes part of the contemplated upgrades, which allow RAHS to begin hosting football games during daylight hours. The upgrades in place by December 29, 2008 are: • reseeding the grass at the football field; • upgrading and repairing the football-field irrigation system; • installing a portable public-address system at the football field; • installing portable bleachers at the football field, with seating for 1,250, to replace older bleachers; • installing an electronic scoreboard at the football field; • upgrading goal posts and adding three flagpoles at the football field; • constructing a temporary snack bar and restroom building; • constructing fencing around the football field and track area; • constructing sidewalks around the perimeter of the football field and a plaza near the existing pool pump and snack bar; and • replacing or upgrading track-and-field facilities (long jump, triple jump, high jump, shot put and pole vault) near the football field.	[1] pp. 4–5; [3] pp. 6–7
2007		
September 15, 2007	DSA certifies and closes the application for construction of three scoreboards at RAHS.	[4]

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Date	Event	Source
2008		
March 6, 2008	DSA certifies and closes the application for a chiller replacement at RAHS.	[5]
October 1, 2008	DSA certifies and closes the application for the following construction at RAHS: • restroom/concession building; • three bleachers (10 rows × 177 ft, 10 rows × 27 ft, and 10 rows × 57 ft); • three scoreboards; • three flagpoles; and • alterations to the football field, sports field and utilities.	[6]
December 29, 2008	The Sacramento County Superior Court issues a peremptory writ of mandate in *Friends and Neighbors of Rio v. San Juan Unified School District* directing the District to prepare an environmental impact report (EIR) for the project.	[1] p. 1; [3] p. 2; [7]
2010		
January 14, 2010	The State Clearinghouse receives the Notice of Preparation of the Draft EIR. The 30-day NOP review period runs to February 15, 2010.	[2]; [3] p. 2
March 29, 2010	The District releases the Draft EIR for a 45-day public review period and sends a Notice of Completion to the State Clearinghouse. Notice is published in newspapers of general or regional circulation.	[2]; [3] p. 2
April 27, 2010	While the Draft EIR comment period is open, the Board of Education adopts Resolution No. 2521 (5–0) under Government Code section 53094(b), exempting the sports facility project from the County zoning code, "which includes all permitting conditions and prohibitions."	[8]
May 13, 2010	The Draft EIR comment period closes. The District has received 15 comment letters.	[3] p. 2
June 3, 2010	The District distributes the Final EIR and its responses to public agency comments.	[3] p. 2; [9]
June 15, 2010	After a public hearing, the Board of Education certifies the Final EIR and approves the "Modified Limited Bleacher Expansion Alternative," which reduces the proposed bleacher capacity from 1,800 to about 1,400 seats. The approved project includes permanent bleachers, an announcer's booth, a permanent public-address system, repositioned and upgraded fields and tennis courts, all-weather track upgrades and a 10,000-square-foot field house. The Findings state that "[n]o nighttime lighting of sports fields is proposed as part of the Project."	[3] pp. 2, 6, 15
June 16, 2010	The State Clearinghouse receives the District's Notice of Determination for the project.	[2]
2014		
July 3, 2014	DSA certifies and closes the application for construction of a swimming pool at RAHS.	[10]

Date	Event	Source
2017		
December 12, 2017	The Superintendent recommends that the Board of Education approve CEQA notices of exemption for 2018 track-and-field projects at Bella Vista and Rio Americano High Schools. The District claims a categorical exemption on the ground that the work replaces or upgrades existing school recreation facilities "with only negligible or no expansion in capacity." The project is described as "renovation and reconfiguration of the existing athletic fields," including: • replacing the natural turf on the existing play field with artificial turf; • resurfacing the track with an all-weather surface; • constructing a scoreboard; and • constructing a restroom/concession building of approximately 1,300 square feet.	[11] p. 3
2018		
April 4, 2018	DSA records an adjustment to the estimated project cost for construction of one sports field, landscaping and supporting utilities at RAHS. As of August 8, 2026, DSA had not certified or closed this application.	[12]
June 6, 2018	DSA certifies and closes the application for construction of two softball fields and four dugouts at RAHS.	[13]
2019		
March 2019	Construction workers find a killdeer nest with four eggs in the newly installed cork and synthetic turf of the RAHS football field. Lacrosse and other spring sports are moved off the field to protect the nest.	[14]
April 30, 2019	DSA certifies and closes the application for construction of the Performing Arts Center at RAHS.	[15]
June 5, 2019	DSA certifies and closes the application for construction of one scoreboard at RAHS.	[16]
2021		
April 13, 2021	DSA certifies and closes the application for construction of a concession/toilet building and a ticket booth building at RAHS.	[17]
2023		
February 7, 2023	RAHS holds a ribbon-cutting ceremony for its renovated Career Technical Education (CTE) building.	[18]
2024		
March 27, 2024	As part of the District's 2024 Facilities Master Plan, a Facility Condition Assessment is performed at RAHS.	[19]
May 8, 2024	The District holds a Facilities Master Plan community forum in the RAHS gymnasium to collect community input on proposed improvements at RAHS, including the stadium.	[19]
June 2024	The District's Facility Master Plan 2024 vision site plan for RAHS identifies "Bleachers," "Stadium Lighting" and a "Press Box" at the football field.	[20]
2025		
June 10, 2025	The Board of Education adopts Resolution No. 4212 authorizing a ground lease with Public Safety Towers, LLC for the cell tower.	[21]; [22]

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Date	Event	Source
October 13, 2025	The District holds a community meeting on the Rio Americano High School Stadium Improvements Project.	[23]; [24]
October 29, 2025	Terracon Consultants, Inc. prepares a memorandum concluding that the cell tower is categorically exempt from CEQA.	[25]
November 4, 2025	At a meeting of the District's Facilities Committee, AECOM presents on environmental scoping for the stadium project.	[26]
2026		
January 6, 2026	The State Clearinghouse receives the Notice of Preparation (NOP) of the Draft EIR for the Stadium Improvements Project (SCH No. 2026010094). The District posts the NOP, the Initial Study and its appendices on its website, and the 30-day comment period begins.	[27]; [28]; [24]
January 7, 2026	The District holds the EIR scoping meeting in the RAHS Performing Arts Center.	[29]; [28] NOP p. 1
February 5, 2026	The comment period on the NOP and Initial Study closes. RACA's comment letter, dated February 4, 2026, is among the comments the District receives.	[27]; [30]
August 11, 2026	DSA approves the cell tower project.	[21]
September 1–2, 2026	The State Clearinghouse receives the Draft EIR (dated August 2026) and Notice of Completion on September 1. The District publishes the Draft EIR, and the 45-day public review period begins September 2.	[31]; [32]; [24]
October 16, 2026	The Draft EIR public review period closes.	[31]; [24]
November 17, 2026 (scheduled)	According to the District's project web page, the Final EIR is scheduled for Board of Education consideration.	[24]

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Sources

Documents marked as submitted with RACA's comments are attached to the comment letter as the exhibit or Exhibit E item named. Web addresses were checked on October 16, 2026, except the DSA project tracker pages, which do not permit automated access and were last checked in August 2026. The Draft EIR, its appendices and the NOP are in the District's own record.

[1] San Juan Unified School District, Draft Environmental Impact Report, Rio Americano High School Outdoor Sports Facility Upgrades Project (SCH No. 2005072119) (March 2010), Executive Summary. Submitted with RACA's comments as Exhibit E, item 3.

[2] State Clearinghouse, CEQAnet, SCH No. 2005072119, Rio Americano High School Outdoor Sports Facility Upgrades: Mitigated Negative Declaration, received July 20, 2005 (https://ceqanet.lci.ca.gov/2005072119); Notice of Preparation, received Jan. 14, 2010 (https://ceqanet.lci.ca.gov/2005072119/2); Draft EIR, received Mar. 29, 2010 (https://ceqanet.lci.ca.gov/2005072119/3); Notice of Determination, received June 16, 2010 (https://ceqanet.lci.ca.gov/2005072119/4). Project record: https://ceqanet.lci.ca.gov/Project/2005072119. CEQAnet does not post the 2005–2010 documents themselves.

[3] San Juan Unified School District Board of Education, CEQA Findings and Statement of Overriding Considerations, Rio Americano High School Outdoor Sports Facility Upgrades Project (June 2010) ("2010 Findings"). Submitted with RACA's comments as Exhibit E, item 5.

[4] Division of the State Architect (DSA), Application No. 02-108404. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=108404

[5] DSA, Application No. 02-108618. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=108618

[6] DSA, Application No. 02-108005. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=108005

[7] Peremptory Writ of Mandate, *Friends and Neighbors of Rio v. San Juan Unified School District*, Sacramento County Superior Court Case No. 06CS00495 (Dec. 29, 2008), as described in the 2010 Findings, p. 2. See also Exhibit E, item 2.

[8] San Juan Unified School District Board of Education, Resolution No. 2521 (Apr. 27, 2010). Submitted with RACA's comments as Exhibit J.

[9] San Juan Unified School District, Final Environmental Impact Report, Rio Americano High School Sports Facility Upgrades (SCH No. 2005072119) (June 2010). Submitted with RACA's comments as Exhibit E, item 4.

[10] DSA, Application No. 02-102339. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=102339

[11] San Juan Unified School District Board of Education, meeting materials, Dec. 12, 2017 (Superintendent's recommendation on notices of exemption for 2018 track-and-field projects at Bella Vista and Rio Americano High Schools). Submitted with RACA's comments as Exhibit E, item 7.

[12] DSA, Application No. 02-116663. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=116663

[13] DSA, Application No. 02-116085. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=116085

[14] Ezra David Romero, "Nesting Shorebirds Block Sacramento Area High School From Using New Turf Field," CapRadio (Apr. 8, 2019), https://www.capradio.org/articles/2019/04/08/nesting-shorebirds-block-sacramento-area-high-school-from-using-new-turf-field/; *The Sacramento Bee*, "This Sacramento-area high school's football field won't open on time — thanks to some birds" (Apr. 2019), https://www.sacbee.com/news/local/article228898164.html. See also Exhibit E, item 8.

[15] DSA, Application No. 02-114649. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=114649

[16] DSA, Application No. 02-116970. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=116970

[17] DSA, Application No. 02-117197. https://www.apps2.dgs.ca.gov/DSA/Tracker/ApplicationSummary.aspx?OriginId=02&AppId=117197

[18] San Juan Unified School District news release, "Rio Americano High School celebrates its renovated CTE building," as published in the *Carmichael Times* (Mar. 1, 2023). https://www.carmichaeltimes.com/2023/03/01/458474/rio-americano-high-school-celebrates-its-renovated-cte-building

[19] San Juan Unified School District, Facilities Master Plan materials: Rio Americano High School Facility Master Plan and Facility Condition Assessment (Mar. 27, 2024), and Facilities Master Plan web page (listing the spring 2024 community forums, including Rio Americano High School, Wednesday, May 8, at the gymnasium). https://www.sanjuan.edu/our-district/construction-news/facilities-master-plan. See also Exhibit E, items 9 and 10.

[20] San Juan Unified School District, Facility Master Plan 2024, Rio Americano High School Site Plan and Floor Plan (Vision and Existing) (last updated June 2024), linked from the District's stadium web page as "Rio

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Americano's campus vision plan." https://www.sanjuan.edu/fs/resource-manager/view/a4e2b6dd-5e98-4aee-8929-e8c490d60969

[21] San Juan Unified School District, "Cell Tower at Rio Americano High School" (web page), including the April 2025 notice to neighbors (https://www.sanjuan.edu/fs/resource-manager/view/e8be39a4-4e1b-4f7d-99de-20e25b948d95. See also Exhibit E, item 16.

[22] San Juan Unified School District Board of Education, Resolution No. 4212 and ground lease with Public Safety Towers, LLC (June 10, 2025). Submitted with RACA's comments as Exhibit E, items 17–18.

[23] San Juan Unified School District, Stadium Improvement Community Meeting presentation (Oct. 13, 2025). https://www.sanjuan.edu/fs/resource-manager/view/cf58ff9a-2865-4023-8c0c-6b2560a2d6ca. See also Exhibit E, item 11.

[24] San Juan Unified School District, "Stadium Improvements at Rio Americano High School" (web page). https://www.sanjuan.edu/riostadium. See also Exhibit E, item 14.

[25] Terracon Consultants, Inc., CEQA exemption memorandum for the Rio Americano High School wireless communications facility (Oct. 29, 2025). Submitted with RACA's comments as Exhibit I.

[26] San Juan Unified School District Facilities Committee, "Rio Americano High School Stadium Improvements" presentation (Nov. 4, 2025). https://www.sanjuan.edu/fs/resource-manager/view/ed394df1-b025-49c8-8ae6-06b14c368140. See also Exhibit E, item 12.

[27] State Clearinghouse, CEQAnet, SCH No. 2026010094, Rio Americano High School Stadium Improvements Project, Notice of Preparation of a Draft EIR, received Jan. 6, 2026, review period Jan. 6 – Feb. 5, 2026. https://ceqanet.lci.ca.gov/2026010094. Attachments: NOP and Initial Study notice (https://ceqanet.lci.ca.gov/2026010094/Attachment/n_c91Z); signed NOP and Notice of Completion form (https://ceqanet.lci.ca.gov/2026010094/Attachment/E6uKfp).

[28] San Juan Unified School District, Notice of Preparation of an Environmental Impact Report and Initial Study (Jan. 5, 2026) (https://www.sanjuan.edu/fs/resource-manager/view/e651f623-12b2-4df7-ac30-3335fb85f902); Rio Americano High School Stadium Improvements Initial Study (Jan. 2026) (https://www.sanjuan.edu/fs/resource-manager/view/04f5d2d4-1b4c-4602-bf14-7f60cfa5705e); Initial Study Appendices (https://www.sanjuan.edu/fs/resource-manager/view/aedf122f-b2de-479c-93b9-0e7d5dc9a14f).

[29] San Juan Unified School District, EIR Scoping Meeting presentation, Rio Americano High School Stadium Improvements Project (Jan. 7, 2026). https://www.sanjuan.edu/fs/resource-manager/view/2d1a63ca-f810-4710-b8d8-711466762783. See also Exhibit E, item 13.

[30] Draft EIR, Appendix A, Notice of Preparation and Comment Letters (including RACA's letter of Feb. 4, 2026). https://www.sanjuan.edu/fs/resource-manager/view/4b1fe262-6e49-46e4-8353-53990cb2cada

[31] State Clearinghouse, CEQAnet, SCH No. 2026010094, Draft EIR, received Sept. 1, 2026, review period Sept. 2 – Oct. 16, 2026. https://ceqanet.lci.ca.gov/2026010094/2. Attachments: Notice of Availability (https://ceqanet.lci.ca.gov/2026010094/2/Attachment/EoaevO); Draft EIR (https://ceqanet.lci.ca.gov/2026010094/2/Attachment/OKwj9u); Notice of Completion (https://ceqanet.lci.ca.gov/2026010094/2/Attachment/TkbAXE).

[32] San Juan Unified School District, Rio Americano High School Stadium Improvements Project Draft EIR (Aug. 2026). https://www.sanjuan.edu/fs/resource-manager/view/3aed1837-aa53-4c48-a854-0feebf829d6b

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Letter O4G

Exhibit G: Matrix of Draft EIR Analysis Keyed to Notice of Preparation Comments

This exhibit compares the concerns raised during scoping in RACA's February 4, 2026 letter and Barbara Dugal's two February 5, 2026 letters (DEIR App. A) with the places where the Draft EIR addresses them. For each concern, it states whether the DEIR's treatment is adequate, identifies the principal deficiency, and describes the correction or additional analysis the Final EIR requires. The DEIR states that Appendix A contains "a summary of all of the comments received" (p. 1-3), but no summary appears there. Page references are to the Draft EIR unless otherwise stated. (Abbreviations: LTA, Local Transportation Analysis (DEIR App. E); MM, mitigation measure; PCZ, Parkway Corridor Combining Zone; CUP, conditional use permit; USACE, U.S. Army Corps of Engineers; APN, assessor's parcel number.)

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NOP comment or issue	Where the DEIR responds	Adequacy and required Final EIR correction	Comment Letter
RACA NOP Letter (Feb. 4, 2026), Section 1: Land Use and Neighborhood Compatibility			
1.1 Integrated land-use and neighborhood compatibility	Section 5.9, pp. 5.9-29 to 5.9-31; Sections 4.1 through 4.4 and 5.13	**Inadequate analysis**. The DEIR analyzes aesthetics, biological resources, noise, transportation, and recreation separately, but does not bring those findings back into a unified land-use compatibility determination. The Final EIR should evaluate whether the expanded scale and intensity effectively create a large event venue and whether the combined operational conditions are compatible with surrounding residences.	II.C; III.F
1.2 Parkway Plan, Parkway Corridor zoning, and County CUP	Section 4.1, pp. 4.1-14, 4.1-18; pp. 5.9-29 to 5.9-31; pp. 4.1-18, 6-6 (County CUP)	**Inadequate analysis**. The DEIR discusses the Parkway Plan and Parkway Corridor zoning but states that Parkway Plan policies do not directly apply (pp. 4.1-14, 4.1-18, 4.2-12) and does not perform a policy-by-policy consistency determination. The Final EIR should apply Policies 7.19, 7.19.1, and 7.24; evaluate the PCZ resource-protection purposes; and explain whether the expanded use complies with the identified County CUP and any other applicable County requirements.	I.B; II.C; III.F
RACA NOP Letter (Feb. 4, 2026), Section 2: American River Parkway Recreation			
2.1 Overall effect on Parkway recreation	Section 5.13, pp. 5.13-33 to 5.14-34 [sic]	**Inadequate analysis**. The recreation analysis asks principally whether the Project would increase use of or physically deteriorate recreational facilities and relies on the Parkway's after-dark closure. By the DEIR's own estimate, event noise at the Parkway edge would be 4 to 17 dBA above the measured daytime ambient (p. 4.2-20), and the DEIR treats a 10 dB increase as a doubling of loudness (p. 4.3-1). The Final EIR should evaluate how noise, lighting, visual change, crowds, traffic, parking, and wildlife disturbance may degrade the daytime and evening Parkway experience, including pre-dusk event activity.	III.F
2.2 Parking, Parkway access, and pedestrian	Section 5.13, p. 5.14-34; Section 4.4, pp.	**Inadequate analysis; internally inconsistent**. Section 5.13 states that event parking would remain within campus lots, while Section 4.4 identifies a substantial on-campus deficit, nearby street parking, and residual demand. The Final EIR should reconcile	III.D; III.F

NOP comment or issue	Where the DEIR responds	Adequacy and required Final EIR correction	Comment Letter
and bicycle conflicts	4.4-6 and 4.4-12 to 4.4-17; Appendix E	the sections; evaluate effects on Parkway access points and users; address campus-to-Parkway walking paths and possible after-hours access; and identify enforceable measures rather than relying only on future management.	
2.3 Noise, lighting, crowd activity, and vibration affecting recreation	Section 4.2, p. 4.2-20; Section 4.3; Section 5.13, p. 5.14-34	**Inadequate analysis**. The DEIR does not provide a recreation-specific assessment of event noise, PA use, band warm-ups, crowd activity, lighting, or bleacher vibration before the Parkway closes. It also inconsistently reports the Parkway maximum as 78 and 84 dBA Lmax and lacks a nighttime Parkway baseline. The Final EIR should correct the error, characterize the measured maximum, compare appropriate baseline and event conditions, and evaluate simultaneous stadium activity and peak Parkway use.	III.B; III.C; III.F
RACA NOP Letter (Feb. 4, 2026), Section 3: Biological Resources and Water Quality			
3.1 Lighting effects on wildlife	Section 4.2, including pp. 4.2-18 to 4.2-24 and Table 4.2-1; Appendix B	**Inadequate analysis**. The less-than-significant conclusion depends on photometric predictions, including 0.00 footcandle at the Parkway edge, even though Appendix B states that field measurements may vary. Bats are not identified in Table 4.2-1. The Final EIR should address affected species expressly, support assumptions concerning wildlife accustomed to existing light, define enforceable operating levels, and require post-installation verification of spill, glare, and skyglow.	III.A; III.B
3.2 Operational noise, vibration, movement, and displacement	Section 4.2, pp. 4.2-20 to 4.2-24; Section 4.3, pp. 4.3-26 to 4.3-27; Section 7	**Inadequate analysis**. The DEIR uses screening-level sound propagation and qualitative biological judgment without a nighttime Parkway baseline or species-specific response analysis. It also states that no long-term vibration source would occur although MM 4.3-1b recognizes footfall or vibration-related noise. The Final EIR should quantify operational noise and vibration at Parkway habitat, address species-specific effects, and treat disturbance-driven avoidance or displacement as a potential impact rather than assuming animals can relocate without consequence.	III.B; III.C
3.3 Operational runoff, trash, and event-generated pollutants	Section 5.8, pp. 5.8-27 to 5.8-28	**Inadequate analysis**. The DEIR evaluates construction-related water-quality effects and dismisses operational effects in one sentence, because the campus drainage system would not be altered (p. 5.8-27). It does not connect increased attendance and event activity to litter, pollutants, storm drains, runoff pathways, or the American River. The Final EIR should analyze operational effects and adopt a defined, enforceable prevention and cleanup program.	III.E
3.4 Combined biological effects and reasonably	Section 7, pp. 7-5 to 7-6; Table 7-1	**Inadequate analysis**. Section 7 relies on separate project-level light and noise findings instead of analyzing the combined biological response to simultaneous light, noise, vibration, and intensified human activity. The Final EIR should provide that integrated analysis and include the USACE American River Common Features Project	III.B; III.H

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NOP comment or issue	Where the DEIR responds	Adequacy and required Final EIR correction	Comment Letter
foreseeable habitat loss		Contract 3B (a reasonably foreseeable project), when assessing the availability of alternative habitat and cumulative habitat loss.	
RACA NOP Letter (Feb. 4, 2026), Section 4: Wildfire Risk and Emergency Access			
4.1 Emergency-vehicle access during peak attendance	Section 4.4, pp. 4.4-14 to 4.4-18; Appendix E	**Inadequate analysis**. The DEIR recognizes potentially significant interference before mitigation, but relies on future event management rather than demonstrating peak-event performance. Records of 911 calls show emergency responses to the campus about once every three weeks, including athletic injuries. The Final EIR should model an emergency vehicle entering or crossing the projected queue and disclose travel time, delay, route clearance, and access to the stadium and surrounding neighborhoods with and without mitigation.	III.D
4.2 Large-crowd evacuation and emergency response	Impact 5.7-5, pp. 5.7-24 to 5.8-25	**Inadequate analysis**. The DEIR relies heavily on general County plans, real-time decisions, outside agencies, and the existing roadway network, but does not provide a project-specific full-capacity evacuation analysis. The Final EIR should evaluate evacuation of at least the largest analyzed crowd, address the fire lane's concurrent pedestrian function, and adopt an enforceable evacuation and staff-training plan.	III.D
4.3 Human-caused and electrical ignition risk	Impact 5.7-6, p. 5.8-25; Section 5.15, p. 5.15-37	**Inadequate analysis**. The DEIR does not analyze whether increased attendance and possible Parkway access increase ignition risk near vegetation or whether new poles, wiring, controls, and other electrical equipment could introduce malfunction or ignition hazards. The Final EIR should evaluate these project-specific and cumulative risks and identify preventive measures.	
RACA NOP Letter (Feb. 4, 2026), Section 5: Transportation and Parking			
5.1 Arrival and post-event departure under maximum attendance	Section 4.4, pp. 4.4-14, 4.4-16 to 4.4-17; pp. 7-12 to 7-13; App. E, PDF pp. 3, 14, 19–20	**Inadequate analysis**. The LTA analyzes a single 5:30–6:30 p.m. arrival hour (App. E, PDF p. 3) and does not analyze the outbound surge when a 2,575- or 3,400-person event ends. The DEIR also rejects the LTA's recommendation to modify the median behind the westbound left-turn pocket at Fair Oaks Boulevard and Saverien Drive and to use event signal timing, calling those changes not "appropriate or necessary" (pp. 4.4-16 – 4.4-17; pp. 7-12 – 7-13). The LTA recommends those changes for recurring 'general events,' such as ordinary football games (App. E, PDF pp. 14, 19–20). The DEIR's own general-event queue of about 615 feet is three times the 195-foot pocket (p. 4.4-14). The Final EIR should adopt them or explain, with evidence, why they are not needed. The Final EIR should also separately model mass departure conditions and evaluate the largest reasonably foreseeable attendance, including graduation attendance.	III.D

O4G-1 (Cont.)

NOP comment or issue	Where the DEIR responds	Adequacy and required Final EIR correction	Comment Letter
5.2 Vehicle, pedestrian, bicycle, and Parkway-user conflicts	Section 4.4, pp. 4.4-14 to 4.4-18; MM 4.4-3a through MM 4.4-3c; Appendix E	**Inadequate analysis**. The DEIR identifies potentially significant conflicts but focuses on streets and crossings near the campus and relies on operational mitigation. The Final EIR should add existing Parkway trail and access movements to the event scenario, evaluate physical design improvements, and establish enforceable performance standards for traffic and pedestrian management.	II.E; III.D
5.3 Parking enforcement, Jesuit parking, and neighborhood emergency access	Section 4.4, including pp. 4.4-6 and 4.4-12 to 4.4-17; Appendix E	**Inadequate analysis**. The 3,400-attendee scenario leaves about 296 vehicles unaccommodated after campus and street parking (pp. 4.4-12 to 4.4-13), and MM 4.4-3a requires only that the District "coordinate" with Jesuit (p. 4.4-15). The DEIR does not quantify spaces guaranteed at Jesuit, the duration and enforceability of the arrangement, parking-control staffing, or consequences for illegal or blocked parking. The Final EIR should supply those details and evaluate emergency response on Fair Oaks Boulevard, Saverien Drive, American River Drive, and surrounding streets during the projected queue.	II.E; III.D
RACA NOP Letter (Feb. 4, 2026), Section 6: Cumulative Effects			
6.1 Cell tower, Jesuit Stadium Lighting Project, and cumulative methodology	Section 7 and Table 7-1	**Inadequate analysis**. The projects are listed and discussed, but the analysis often asks whether their footprints overlap rather than whether they affect the same views, habitat, residences, streets, Parkway users, and emergency facilities. The Final EIR should evaluate those common receptors and include other reasonably foreseeable campus and Parkway projects, including the cell tower, remaining Facilities Master Plan improvements, and USACE Contract 3B.	II.D; III.H
6.2 Combined viewshed, lighting, glare, and skyglow	Section 7, including pp. 7-3, 7-8, and 7-11 to 7-12	**Inadequate analysis**. The DEIR does not provide an integrated viewshed or combined photometric assessment of the 90-foot cell tower, Rio's four 80-foot light poles, and Jesuit's 90- to 100-foot poles. The Final EIR should include representative renderings and evaluate simultaneous illumination, glare, skyglow, neighborhood character, Parkway views, and consistency with Parkway Plan Policy 7.24.	III.A; III.H
6.3 Combined biological and Parkway recreation effects	Section 7, pp. 7-5 to 7-6 and p. 7-11	**Inadequate analysis**. The DEIR does not analyze the combined biological response or the qualitative Parkway experience produced by the tower, both stadiums, amplified sound, crowds, and increased activity. The Final EIR should analyze shared receptors and pre-dusk effects.	III.H
6.4 Equipment, maintenance, generator	Table 7-1; Section 7,	**Inadequate analysis**. The DEIR identifies the tower equipment shelter, backup generator, and occasional maintenance trips but does not disclose servicing frequency, generator testing, access routes, maintenance noise, equipment use, or	III.C; III.H

O4G-1 (Cont.)

NOP comment or issue	Where the DEIR responds	Adequacy and required Final EIR correction	Comment Letter
operation, and access	including pp. 7-4 and 7-10	combined stadium and tower maintenance activity near residences and the Parkway. The Final EIR should disclose and analyze those operational characteristics.	
6.5 Combined transportation, evacuation, and wildfire risk	Section 4.4; Section 7; MM 4.4-3a through MM 4.4-3c	**Inadequate analysis**. The DEIR relies on operational coordination to avoid simultaneous Rio and Jesuit peak events and does not model simultaneous evacuation or fully analyze cumulative ignition and emergency-response conditions. The Final EIR should disclose enforceable scheduling and parking commitments, analyze concurrent event and evacuation conditions, and evaluate cumulative risk from increased activity and electrical equipment.	III.D; III.H
RACA NOP Letter (Feb. 4, 2026), Section 7: Assumptions and Supporting Evidence			
7.1 Event frequency, practice days, and attendance	Table 3-1; pp. 3-7 to 3-9; Sections 4.1, 4.2, and 4.4.	**Inadequate analysis**. Event frequencies are presented as estimates rather than enforceable limits; the DEIR refers to 88 practice days although Table 3-1 indicates 93 to 112 team-practice days; and 3,400 attendees is an analytical assumption rather than an operational ceiling even though average graduation attendance is approximately 3,500. Other operating assumptions are also stated only as expectations: practice lighting "would generally end by 8:00 P.M.," post-event lighting "typically" lasts 30 minutes, and events without a schedule are assumed to occur "once monthly on average." (DEIR, p. 3-7.) The Final EIR should reconcile the figures and make any assumption necessary to an impact conclusion an enforceable project limitation.	II.B; III.D
7.2 Noise and lighting methods and assumptions	Sections 4.1 through 4.3; Appendices B and D; Section 7	**Inadequate analysis**. The analysis lacks a nighttime Parkway noise baseline, measures residential attenuation from an acoustical center rather than the nearest source, never compares predicted event noise with the County standards it adopts as thresholds (p. 4.3-15), refers to temporary diesel lights as an existing condition, and does not define the "reduced illumination" used for many events. The Final EIR should correct the baseline and receptor assumptions, define operating levels by event type, make them enforceable, and require post-installation sound and lighting verification.	II.B; III.A; III.C
7.3 Transportation assumptions and cumulative evidence	Section 4.4; Appendix E; Section 7	**Inadequate analysis**. Several mode-share and behavioral assumptions, including walking and bicycling percentages, lack project-specific support; Jesuit parking capacity is not quantified or guaranteed; and the cumulative analysis does not consistently examine combined effects at shared receptors. The LTA's graduation estimate starts from a count of 480 graduating seniors sourced only to an email from AECOM, the DEIR's preparer (App. E, PDF p. 8 & n. 1.) The Final EIR should identify	III.D

O4G-1 (Cont.)

NOP comment or issue	Where the DEIR responds	Adequacy and required Final EIR correction	Comment Letter
		the data supporting each material assumption, disclose enforceable contingencies, and perform the missing combined analyses.	
Barbara Dugal NOP Letters (Feb. 5, 2026)			
Dugal first letter - outside use, standing room, real-time contact, Jesuit enrollment, and Rio overflow parking	MM 4.3-1b and the 10:00 p.m. band and amplified-sound cutoff, pp. 1-11 to 1-12; MM 4.4-3a	**Inadequate analysis**. The DEIR does not disclose or limit outside use, standing-room attendance, or the effects of Jesuit's coeducational enrollment on attendance and overflow parking. The Final EIR should disclose foreseeable non-school and shared uses, establish an enforceable attendance limit and complaint contact, and define any parking coordination relied upon as mitigation.	II.E; III.D; III.H
Dugal second letter - second APN and use of the term stadium	Section 3, p. 3-1	**Not addressed**. The DEIR lists only APN 292-0210-019-0000 (p. 1-1) and retains the "existing Raider Stadium" label. In its October 29, 2025 memorandum, Terracon, the District's consultant, placed the cell tower project on both APN 292-0210-019 and APN 292-0210-021, confirming that the second parcel is part of the campus. The DEIR identifies only the first. The Final EIR should identify all affected parcels and explain the legal and factual basis for describing the existing facility as a "stadium."	

O4G-1 (Cont.)

Note: This matrix summarizes the principal relationship between the NOP comments and the Draft EIR's analysis. It does not limit the issues, evidence, or requested corrections presented in RACA's comment letter and exhibits.

Exhibit H: Table Summary: Material Differences Between the 2010 and 2026 Environmental Reviews for Rio Americano High School Outdoor Athletic Facilities

O4H-1

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
Prior project and environmental-review history	The 2010 EIR evaluated a coordinated program of outdoor athletic-facility improvements. The project included work completed as part of the 2007 upgrades and proposed permanent bleachers, an announcer's booth, a permanent public-address system, field and track improvements, repositioned courts, support buildings, and a field house. The Board certified the EIR and approved a modified reduced-capacity alternative. (2010 Findings, pp. 5–12.)	The DEIR states only that bleachers and "small upgrades" were installed in 2006 and that unspecified stadium improvements were completed in 2019. It does not identify the 2010 EIR, the project previously approved by the Board, or the associated findings, statement of overriding considerations, and mitigation program. (2026 DEIR, p. 3-1.)	The Final EIR should disclose the prior approval and explain which components were constructed, modified, abandoned, or removed; how the 2019 improvements related to the 2010 approval; and which previously adopted mitigation measures were implemented and remain operative.
Existing and approved seating	The 2010 EIR described approximately 1,250 portable seats installed as part of the 2007 upgrades, evaluated	The DEIR identifies approximately 288 existing seats and proposes approximately 2,575 seats, without explaining	The Final EIR should reconcile the stated baselines, explain the disposition and authorization of the previously installed and

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
	permanent seating for approximately 1,800 spectators, and analyzed a Limited Bleacher Expansion Alternative retaining approximately 1,250 seats. The Board approved a modified alternative with approximately 1,400 permanent seats. (2010 Findings, pp. 6, 8, 40–42.)	what happened to the seating evaluated, installed, or approved through the prior proceeding. (2026 DEIR, pp. 3-1, 3-4.)	approved seating, and identify any prior mitigation obligations associated with those facilities.
Event attendance and intensity of use	The prior project was intended to accommodate home football games and other athletic and community uses. The 1,250- and 1,400-seat alternatives were found capable of meeting all or substantially all project objectives while reducing crowd size, traffic, parking demand, air emissions, and noise. (2010 Findings, pp. 40–42.)	The current Project would accommodate approximately 2,575 seated spectators and evaluates events with attendance as high as 3,400. It would permit five to eight home football games, graduation, assemblies, community events, and numerous evening games and practices. (2026 DEIR, pp. 3-6–3-9; Table 3-1.)	The current Project would authorize a materially greater seating capacity and operating intensity than the reduced-capacity project previously approved. The Final EIR should evaluate whether the prior reduced-capacity range remains a feasible means of reducing acknowledged noise, traffic, parking, air-quality, lighting, and biological effects.
Nighttime lighting and	The 2010 Findings expressly stated that no nighttime sports-field lighting was proposed. The	The DEIR treats portable diesel-powered lighting and limited evening activity as existing	The Final EIR should disclose when nighttime stadium operations began, how they were

O4H-1 (Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
operating schedule	2007 improvements allowed football games during daylight hours. Only limited security lighting for support structures was evaluated. (2010 Findings, pp. 7, 15.)	conditions and proposes four permanent 80-foot stadium-light standards, pedestrian lighting, approximately 40 evening or nighttime events, and as many as 88 practice days that could involve evening lighting. (2026 DEIR, pp. 3-1, 3-4, 3-6–3-9; 4.1-23–4.1-25.)	authorized, and whether they received environmental review. It should also distinguish occasional portable-light use from the greater frequency, reliability, duration, and intensity of nighttime use enabled by permanent lighting.
Visual character and Parkway views	The 2010 EIR found that permanent bleachers and related structures would substantially alter the site's visual character. Mitigation required screening along the eastern, northern, and southern athletic-field boundaries; evergreen planting and replacement; continued maintenance while the school operates; neutral colors; low-reflectivity materials; and consultation regarding structures visible from the	The DEIR concludes that approximately 2,575 seats, a press box, and four 80-foot light standards would have a less-than-significant visual-character impact. It relies in part on existing mature landscaping and the asserted visual similarity of the proposed improvements to existing development, but does not carry forward comparable screening, color, reflectivity, maintenance, or replacement requirements. (2026 DEIR, pp. 4.1-16–4.1-19.)	The Final EIR should explain why a larger and taller stadium installation warrants a less-severe conclusion and less mitigation. It should determine whether the vegetation on which the current analysis relies was installed or maintained pursuant to the 2010 mitigation and should make retention, maintenance, and replacement enforceable for the life of the Project.

O4H-1 (Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
	Parkway. The impact was reduced to less than significant. (2010 Findings, pp. 13–15.)		
Light and glare	Because no nighttime field lighting was proposed, the 2010 analysis principally addressed security lighting and reflective surfaces. Mitigation required downward shielding, concentration of lighting toward the campus, screening, low-reflectivity materials, and design restrictions on the announcer's booth. (2010 Findings, pp. 15–16.)	The current Project would introduce permanent high-mast sports lighting and ball-tracker fixtures and substantially expand evening use. The DEIR finds the effect less than significant with Mitigation Measure 4.1-2, based partly on modeled illumination, fixture design, and a DarkSky rating. (2026 DEIR, pp. 4.1-20–4.1-25.)	The Final EIR should explain why the more intensive lighting program does not require the earlier screening and material controls. It should also make the assumed operating levels, curfews, fixture settings, ball-tracker restrictions, field verification, and corrective action enforceable.
Construction noise	The 2010 EIR found construction noise significant before mitigation and less than significant after requiring equipment maintenance, best-available noise-suppression devices, shielding and muffling of equipment, limits on idling, separation of stationary	The DEIR predicts that construction noise would remain approximately 15 to 25 dBA above measured ambient levels and concludes that the impact would remain significant and unavoidable after Mitigation Measure 4.3-1a. The operative measure does not carry forward	The Final EIR should explain why previously adopted controls were omitted and evaluate whether carrying them forward would further reduce the impact. It should also reconcile the Project Description's narrower weekday construction schedule with mitigation authorizing

O4H-1 (Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
	equipment from sensitive receptors, and restricted hours. (2010 Findings, pp. 21–22.)	all of the previously adopted equipment-control requirements. (2026 DEIR, pp. 4.3-23–4.3-27.)	longer weekday and weekend hours.
Operational stadium noise	The 2010 EIR found operational stadium noise significant and unavoidable even with detailed mitigation. Adopted measures included a six-foot masonry sound wall, band-location restrictions, an air-horn prohibition, speaker shielding, an adaptive-gain satellite-speaker system, independently controlled speakers, downward and receptor-avoidant orientation, post-installation evaluation by an acoustical specialist, corrective action, and limits on public-address use for non-school activities. (2010 Findings, pp. 23–28.)	The DEIR likewise finds high-capacity-event noise significant and unavoidable. Mitigation Measure 4.3-1b requires a distributed speaker system, volume controls, a property-line performance level, restrictions after 10:00 p.m., noisemaker controls, and certain bleacher treatments. It does not carry forward the sound wall, the same post-installation monitoring and corrective-action program, or the prior restrictions on non-school public-address use. Some requirements remain subject to later design or feasibility determinations. (2026 DEIR, pp. 4.3-24–4.3-27.)	The Final EIR should provide a measure-by-measure comparison, identify which 2010 measures were implemented, and explain why any previously adopted measure is no longer feasible or applicable. The absence of those measures is especially material because the current Project would provide more seats and enable substantially more evening and nighttime activity.

O4H-1 (Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
Effects on Parkway wildlife	The 2010 analysis acknowledged that construction and operational noise could startle or disrupt wildlife in the adjoining Parkway but found the effect less than significant based partly on the timing, infrequency, and duration of disturbance. No nighttime sports-field lighting was proposed. (2010 Findings, pp. 34–35.)	The DEIR acknowledges that event noise at the edge of suitable Parkway habitat could increase by approximately 4 to 17 dBA over measured daytime ambient levels and that nighttime lighting and noise can affect protected wildlife. It nevertheless finds the effects less than significant based partly on the intermittent nature of events and the assumed ability of mobile wildlife to avoid disturbance. (2026 DEIR, pp. 4.2-18–4.2-22.)	The current analysis should reconcile its conclusions with the substantially expanded nighttime-use program and permanent lighting. It should address whether the frequency and duration assumptions supporting the 2010 conclusion remain applicable and whether the earlier conclusion depended on the absence of nighttime sports lighting.
Transportation, parking, and circulation	The 2010 analysis evaluated a proposed capacity of 1,800 spectators and found cumulative transportation effects less than significant. It found that parking would be adequate under the 1,250- and 1,400-seat alternatives and that those alternatives would reduce	The DEIR evaluates approximately 2,575 seats and a high-attendance scenario of 3,400 people. That scenario would generate an estimated demand for 1,295 vehicles, an on-campus deficit of approximately 623 spaces, and residual demand after identified	The Final EIR should explain why the substantially larger capacity is appropriate despite the prior finding that reduced capacity would lessen transportation effects while satisfying project objectives. It should not rely on unexecuted arrangements or advisory measures without

O4H-1
(Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
	traffic and parking demand. (2010 Findings, pp. 35, 40–42.)	on-street parking. The DEIR relies on a future shared-parking agreement, an Event Transportation Management Plan, and high-capacity circulation measures. (2026 DEIR, pp. 4.4-12–4.4-16.)	objective triggers, performance standards, monitoring, corrective action, and an enforceable attendance limitation or other fallback.
Operational air quality and greenhouse-gas emissions	The 2010 analysis attributed increased operational emissions to additional football-event travel. It found individual operational emissions below applicable thresholds but treated the Project's operational contribution to regional nonattainment as cumulatively considerable and significant and unavoidable. It reported approximately 12.3 metric tons of annual operational greenhouse-gas emissions. (2010 Findings, pp. 26–27, 33–34.)	The DEIR concludes that operational air-quality and GHG effects would be less than significant and that the Project's air-quality contribution would not be cumulatively considerable because modeled emissions remain below current thresholds. The modeling reports approximately 20 metric tons of annual operational GHG emissions and relies on an estimate of 6,826 annual one-way event trips. (2026 DEIR, pp. 5.2-5–5.2-6; 5.6-20–5.6-21; 7-3–7-4.)	The Final EIR should identify the changed thresholds, methodologies, and evidence supporting the different cumulative conclusion. It must also correct the apparent arithmetic error in the 6,826-trip estimate and rerun the air-quality and GHG models before relying on their results.

O4H-1 (Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
Alternatives	The 2010 EIR evaluated an Existing Improvements Only Alternative, a 1,250-seat Limited Bleacher Expansion Alternative, and a 1,400-seat Modified Limited Bleacher Expansion Alternative. The 1,250-seat alternative was found to meet all project objectives while reducing noise, traffic, air-quality, and GHG effects. The approved 1,400-seat alternative was found to substantially meet all objectives while reducing those effects. (2010 Findings, pp. 39–42.)	The DEIR evaluates only No Project and relocation of the same 2,575-seat stadium program elsewhere on campus. It states that No Project would meet none of the objectives. The relocation alternative would reduce no impact category and would increase impacts in numerous categories. No reduced-capacity or limited-nighttime-use alternative is analyzed. (2026 DEIR, pp. 6-4–6-17.)	The Final EIR should analyze a reduced-capacity alternative within the approximately 1,250- to 1,400-seat range previously found feasible, together with appropriate limits on nighttime operations. If the District now considers that alternative infeasible or incapable of attaining most basic objectives, it should identify the changed facts and supporting evidence.
Continuing mitigation obligations	Several adopted measures imposed continuing obligations, including long-term landscape maintenance, operational restrictions, public-address controls, sound-wall construction, acoustical verification, and corrective	The DEIR neither identifies the prior mitigation program nor provides an accounting of whether its measures were implemented, remain in effect, or would be displaced or modified by the current Project.	The Final EIR and mitigation-monitoring program should provide a measure-by-measure accounting and carry forward every still-applicable feasible measure. If a measure has been completed, superseded, or determined infeasible, the

O4H-1
(Cont.)

Topic	2010 EIR and Approval	2026 DEIR	Material Difference and Required Reconciliation
	action. (2010 Findings, pp. 13–15, 23–28.)		District should identify the supporting evidence and explain the effect of that determination on the current analysis.
County Zoning Status	District Board adopted Resolution 2521 in April 2010, exempting the sports facilities project from County zoning requirements.	DEIR asserts, without support, that County zoning requirements do not apply to the Project. No § 53094 action identified	The prior adopted resolution is an admission that County zoning code and permitting requirements apply unless the District duly approves an exemption under Government Code § 53094.

O4H-1
(Cont.)

Source note: "2010 Findings" refers to the District's findings, statement of overriding considerations, alternatives findings, and related description of the 2010 Final EIR for the Rio Americano High School Outdoor Sports Facility Upgrades, SCH No. 2005072119. "2026 DEIR" refers to the Rio.Americano.High.School.Stadium.Improvements.Project.Draft.Environmental.Impact.Report.

Seating-data note: The 2010 Findings repeatedly identify approximately 1,250 portable seats installed through the 2007 upgrades and analyze that number as the existing seating capacity, but one passage refers to 1,400 portable seats existing as of December 2008. (2010 Findings, pp. 5–8.) The Final EIR should clarify this internal discrepancy as part of its reconciliation of the prior and current baselines.

Letter O4I

Memorandum

TO: Nicholas Arps
P: (916) 971-5780
E: Nicholas.arps@sanjuan.edu

San Juan Unified School District
3738 Walnut Avenue
Carmichael, California 95608

FROM: Terracon Consultants, Inc.

DATE: October 29, 2025

RE: Rio Americano High School New Cell Tower Project
CEQA Notice of Exemption and Categorical Exemption Memorandum
Terracon Project No: NB257352

Project Information:

The proposed project is located entirely within Rio Americano High School's campus at 4540 American River Drive (Assessor Parcel Numbers [APNs]: 2920-210-019-0000 and 292-0210-021-0000), in Sacramento, Sacramento County, California. The project area spans approximately less than an acre of primarily landscaped and paved areas within the school's boundaries (**Exhibit 1**). The project scope includes the installation of a new 90-foot monopole cell tower and the associated infrastructure (telecommunications facility, equipment compound, and chain link gate).

As the actions associated with the proposed project are not expected to result in a significant environmental impact, it is expected that this project is exempt under the Class III Categorical (New Construction or Conversion of Small Structures) and Class XIV Categorical Exemption (Minor Additions to Schools), as described in the California Code of Regulations, Title 15, Section 15300 et seq.

Legal Setting:

Categorical Exemptions (Cal. Code Regs. tit. 14 § 15300)

Projects that are not expected to result in a significant environmental impact may be Categorically Exempt from the California Environmental Quality Act (CEQA) review. As described in Cal. Code Regs. tit. 14 § 15300, *Section 21084 of the Public Resources Code requires these guidelines to include a list of classes of projects which have been determined not to have a significant effect on the environment and which shall, therefore, be exempt from the provisions of CEQA. In response to that mandate, the Secretary for Resources has found that the following classes of projects listed in this article do not have a significant effect on the environment, and they are declared to be categorically exempt from the requirement for the preparation of environmental documents*.

Like many campus-improvement projects, the proposed project is not expected to result in any significant environmental impacts under CEQA. **Table 1** provides an abbreviated CEQA checklist, explaining why the implementation of the proposed project would not result in any significant environmental impacts.

O4I-1

Table 1. Abbreviated CEQA Environmental Checklist

Impact Category	Description
Aesthetics	The proposed project would not result in impacts related to scenic vistas or state-listed scenic highways as the nearest scenic location is the California State Route 160, approximately 22 miles southwest of the school. Further, it would not require the installation of equipment that would be inconsistent with previous conditions; and would not result in an impact on Aesthetics.
Agriculture and Forestry Resources	The proposed project would not involve agricultural lands or Prime Farmland.
Air Quality	The proposed project would not result in the exposure of pollutants or odors to sensitive receptors. Although Sacramento County is in nonattainment status for PM-2.5 (2006) and 8-Hour Ozone (2015) criteria pollutants, the proposed project would not result in a significant net increase of such pollutants, nor would the project conflict with the Sacramento Metropolitan Air Quality Management District (SMAQMD)'s ability to comply with any applicable State Implementation Plan (SIP) as the emissions would be associated with the limited use of construction equipment. The equipment required for this project would be operated as needed for a limited amount of time.
Biological Resources	Terracon biologist Andrea Gonzalez conducted a biological survey on October 16, 2025. The project area does not provide habitat for federally- or state-listed species, nor would it affect a Habitat Conservation Plan (HCP), or other sensitive biological resources. However, Terracon recommends a pre-construction nesting bird survey if construction work is scheduled during the California nesting bird season (generally February 1st through August 31st).
Cultural Resources	The project area does not contain known historic properties and is not suspected to contain archaeological artifacts as the general area is previously developed. If archaeological or cultural resources are discovered onsite, work would cease immediately until consultation and approval to continue work was provided by a qualified archaeologist.
Energy	The proposed project would not result in an impact related to the wasteful or inefficient use of energy since the project will not require the use of equipment with high energy requirements during its operations.

O4I-1 (Cont.)

Geology and Soils	The proposed project would not result in geological impacts. The project construction would take place on previously developed land and would not result in new construction in unsafe soils.
Greenhouse Gas Emissions	Although greenhouse gases would be emitted during project construction, it would not result in a significant impact on the environment, nor would it conflict with a plan, policy, or regulation aimed at reducing greenhouse gas emissions.
Hazards and Hazardous Materials	The proposed project would not involve the use or release of potentially hazardous substances. Abatement of Hazardous Materials Plan (AHMP) will be created prior to project construction to handle potential unexpected encounters with hazardous materials.
Hydrology and Water Quality	Local water quality impacts would be avoided by the usage of routing stormwater Best Management Practices (BMPs) during construction and material staging activities.
Land Use and Planning	The proposed project would not divide an established community, nor would it result in a conflict with a land use plan or zoning ordinance as the project does not modify existing land use.
Mineral Resources	The proposed project would not require the extraction of Mineral Resources.
Noise	The proposed project would not result in the exposure of excessive noise levels. Construction would not take place during the school year. Further, measures such as limiting construction to daytime hours and complying with County noise ordinances would avoid temporary construction-related noise impacts. The project would not result in any permanent noise impacts.
Population and Housing	The proposed project would not involve housing or population growth.
Public Services	The proposed project would not negatively affect public services but instead would improve cell service for the campus and surrounding community.
Recreation	The proposed project would not lead to the deterioration of other existing recreational facilities on campus, nor would it involve the construction of new facilities that would result in an adverse physical environmental consequence.

O4I-1
(Cont.)

Transportation	While the school is located near a main thoroughfare (American River Drive), the proposed project would not have a significant effect on transportation since construction will be small-scale and confined towards the southern end of campus away from American River Drive. Furthermore, construction will occur outside of the school year when student traffic patterns will not be affected by the work.
Tribal Cultural Resources	The proposed project would not impact a listed or eligible resource as there are no known relationships to the site; however, if resources are discovered during any ground disturbing activities, work will cease immediately and both federally and state recognized tribes will be contacted.
Wildfire	The proposed project does not involve Wildfire Hazards since the project will not increase fire loading.
Mandatory Findings of Significance	The proposed project does not have the potential to substantially degrade or reduce the habitat of a species or impact known sensitive resources. The project would not result in a cumulatively considerable contribution to a cumulative impact.

O4I-1
(Cont.)

Exceptions (Cal. Code Regs. tit. 14 § 15300.2)
It should be noted that six (6) exceptions are described, which if applicable to a project, would disqualify the project from the usage of a Categorical Exemption. These exceptions are:

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

O4I-1 (Cont.)

Categorical Exemption Class III – New Construction or Conversion of Small Structures (Cal. Code Regs.tit. 14 § 15303)
Class 3 projects are described in § 15303 as "*construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure."* The installation of a cell tower within Rio Americano High School's existing property qualifies as new construction and fits the description provided in Cal. Code Regs. tit. 14 § 15303.

Categorical Exemption Class XIV – Minor Additions to Schools (Cal. Code Regs.tit. 14 § 15314)
Class 14 projects are described in § 15314 as "*minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less."* The installation of a cell tower would take place entirely within Rio Americano High School's existing property. It does not involve the addition of ten or more classrooms, nor would it increase the school's student capacity by more than 25%. The proposed project fits the description provided in Cal. Code Regs. tit. 14 § 15314.

Summary:

The proposed project would not result in any significant impacts to the environment (please see **Table 1**). The activities that make up the proposed project (installation of a new 90-foot monopole cell tower) meet both the description of a Class 3 and Class 14-exempt project as well as the criteria listed in the Exceptions to CEQA Categorical Exemptions. The project area is not located on a hazard waste site or other environmental feature of critical concern. The proposed project would not result in a significant impact, nor would it result in a cumulatively considerable contribution to a significant cumulative impact. The long-term effects of the project are likely to improve cell service throughout the campus and general vicinity of the school.

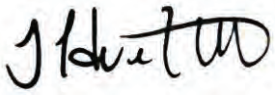
The project site is not in the vicinity of a Scenic Highway, and the project would not be expected to impact historical resources. No historic properties are known to exist in the project area; if artifacts were to be found during construction, work would stop immediately, and a qualified archaeologist would be consulted with before work were to resume. Terracon additionally recommends that if any construction work is scheduled during the California nesting bird season (February 1st through August 31st), a preconstruction nesting bird survey should be conducted by a qualified biologist for the proposed project to remain in compliance with the Migratory Bird Treaty Act (MBTA) of 1918.

Considering the data summarized in this memorandum, it is Terracon's opinion that the Rio Americano High School New Cell Tower Project is Categorically Exempt from CEQA documentation.

Sincerely,
Terracon Consultants, Inc.



Andrea Gonzalez
Staff Biologist



J. Hunter Watkins
Authorized Project Reviewer

Enclosures:
Exhibit 1 – Project Location
Notice of Exemption (NOE) Form

O4I-1
(Cont.)



Legend

- Site Boundary
- Project Area



0 150 300 600 Feet

1:3,600 1 inch equals 300 feet

DATA SOURCES:
ESRI WMS - World Aerial Imagery, OpenStreetMap

Project No.:	NB257352
Date:	Oct 2025
Drawn By:	AAG
Reviewed By:	JHW

Terracon
Explore with us
50 Goldenland Ct, Suite 100 Sacramento, CA 95834
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SITE DIAGRAM

Rio Americano High School
New Cell Tower Project

Exhibit

1

C:\Users\agonzalez\OneDrive - Terracon Consultants Inc\NB257352 Rio Americano HS Proposed Cell Tower - CEQA NOE - General\07 Working Files\01 Drafts\GIS\Maps\Exhibit 1 Site Diagram.mxd

Print Form

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

County Clerk
County of: Sacramento
600 8th Street
Sacramento, CA 9514

From: (Public Agency): San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
(Address)

O4I-1
(Cont.)

Project Title: Rio Americano High School New Cell Tower Project

Project Applicant: San Juan Unified School District

Project Location - Specific:

Rio Americano High School, 4540 American River Drive, Sacramento, CA

Project Location - City: Sacramento Project Location - County: Sacramento

Description of Nature, Purpose and Beneficiaries of Project:
Installation of 90-foot monopole cell tower towards the southern boundary of campus.

Name of Public Agency Approving Project: San Juan Unified School District

Name of Person or Agency Carrying Out Project: San Juan Unified School District

Exempt Status: **(check one):**

- ☐ Ministerial (Sec. 21080(b)(1); 15268);
- ☐ Declared Emergency (Sec. 21080(b)(3); 15269(a));
- ☐ Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- ☒ Categorical Exemption. State type and section number: Cal. Code Regs. tit. 14 § 15303 and 15314
- ☐ Statutory Exemptions. State code number:

Reasons why project is exempt:
Project would not result in a significant environmental impact and is not disqualified by any of the exceptions to CEQA Exemptions.

Lead Agency Contact Person: Nicholas Arps Area Code/Telephone/Extension: (916) 971-5780

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: Date: Title:

☐ Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR:

Letter O4J

O4J-1

SAN JUAN UNIFIED SCHOOL DISTRICT

Resolution No. 2521

EXEMPTING THE RIO AMERICANO HIGH SCHOOL SPORTS FACILITY PROJECT FROM THE COUNTY OF SACRAMENTO ZONING CODE

WHEREAS, the San Juan Unified School District ("District") is proposing to develop the sports facility at Rio Americano High School including upgrades to the existing fields, and to construct and reconstruct improvements, including but not limited to a permanent snack bar and restroom, a field house, and the installation of permanent and additional portable bleachers ("the Project").

WHEREAS, Government Code section 53094(b) expressly authorizes the District to exempt the Project from the County of Sacramento's zoning code and permit requirements by a two-thirds (2/3) vote of the District's Board members;

WHEREAS, the County of Sacramento zoning code unduly hampers, interferes with, and may delay or limit the Project;

WHEREAS, high school sports are scholastic events that are an integral and vital part of an educational program that emphasizes building character, teamwork, discipline, sportsmanship, and competition;

WHEREAS, sports provide secondary students with activities that are safe, organized, and secure; foster a sense of community and well being; and lead to improved student achievement and student retention;

WHEREAS, the proposed Project will provide a place in which the community can gather and increase school spirit, and build a strong sense of community;

WHEREAS, sports are an integral part of the Rio Americano High School community and an important part of the overall education of the District's current and future students.

NOW, THEREFORE, THE SAN JUAN UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION RESOLVES, for good and sufficient cause based on the entire record of proceedings, as follows:

1. That each of the foregoing recitals is true and correct.

2. That the Board of Education finds the Project to be a classroom facility and exempts the Project from the County of Sacramento's zoning code, which includes all permitting conditions and prohibitions that may otherwise apply to the Project.

3. That the Superintendent or her authorized designee is directed to serve notice of this action upon the County of Sacramento within ten (10) days.

PASSED, ADOPTED, AND APPROVED by at least two-thirds (2/3) votes of the members of the Governing Board of the San Juan Unified School District this 27th day of April, 2010, by the following votes:

O4J-1
(Cont.)

AYES: 5

NOES: Ø

ABSTENTIONS: Ø

ABSENT: Ø

By: _____
President, Governing Board

By: _____
Vice President, Governing Board

By: _____
Clerk, Governing Board

By: _____
Member, Governing Board

By: _____
Member, Governing Board

ATTEST:

_____
Secretary of the Governing Board
and Superintendent of the District

Letter O5

From:	Mark Baker
To:	Rio Americano; mbassanelli@sanjaun.edu; nicholas.arps@sanjuan.edu
Subject:	Rio Americano stadium
Date:	Friday, October 2, 2026 4:35:13 PM

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Report Suspicious

To Whom It May Concern,

I am writing to express my concerns regarding the proposed stadium construction at Rio Americano High School. The project would include an almost **800% increase in bleacher capacity**, along with significant increases in noise, lighting, traffic, and activity adjacent to the American River Parkway. O5-1

My primary concern is the impact this project could have on the quality of life for the surrounding community, as well as on the wildlife and habitat that depend on a relatively dark and quiet American River Parkway. I am also concerned that the proposal does not provide adequate improvements to evacuation planning, security, or emergency management to protect students, parents, staff, and event attendees. O5-2 O5-3

I understand the Sacramento City Unified School District's desire to provide stadium facilities at its high schools. However, I do not believe the proposed location at Rio Americano High School, immediately adjacent to the state-protected American River Parkway, is appropriate for a high-intensity sports and event facility of this scale. O5-4

The District recently added a track and field facility at the proposed stadium location. In my view, this campus also presents an exceptional opportunity to develop a state-of-the-art environmental science and education program that could use the American River Parkway as a living classroom and provide students with an educational opportunity that few schools could offer. O5-5

Concerns Regarding the DEIR

Event Noise

The DEIR identifies event noise as a significant and unavoidable impact even after proposed mitigation. If the impacts cannot be adequately mitigated, I believe another alternative should be evaluated. I would also like to know specifically how the proposed project would comply with the Sacramento County Noise Ordinance, particularly during evening events. O5-6 O5-7

Lighting

The environmental review should meaningfully evaluate glare, skyglow, light spectrum, and nighttime activity associated with the stadium, particularly given its location immediately adjacent to the Parkway and river corridor. The FEIR should require lighting designed to achieve the greatest practical reduction in nighttime light impacts, consistent with DarkSky principles and wildlife-sensitive lighting practices. O5-8

Incomplete Environmental Baseline and Project Description

The DEIR/FEIR should: O5-9

- Clearly identify the **maximum anticipated operating conditions** for the stadium, rather than relying on generalized "typical" operating conditions.
- Establish reasonable **night-event management standards**, including facility-use rules, staffing, security, parking controls, and public-address system limitations. O5-10
- Ensure that these standards are consistent with surrounding residential uses, O5-11

the **Parkway Corridor Combining Zone (PCCZ)**, and the **American River Parkway Plan 2008**.

- Use an accurate existing environmental baseline. In particular, portable diesel-powered lighting that the District has only recently begun using should not be treated as an established existing condition for purposes of evaluating the project's impacts.

O5-11 (Cont)

O5-12

Biological Resources

The DEIR/FEIR should fully evaluate the effects of ongoing stadium operations—not simply construction—on wildlife, habitat, and recreational use of the American River Parkway. This should include the effects of nighttime lighting, noise, crowds, traffic, and recurring events.

O5-13

Cumulative Impacts

The environmental review should evaluate the cumulative effects of the proposed stadium together with the recently approved **90-foot cell tower**. These projects are located in the same area and should be considered together when evaluating changes to the visual environment, wildlife, lighting, noise, and overall activity along the Parkway.

O5-14

Parking and Traffic

The DEIR/FEIR should provide a comprehensive parking and transportation analysis based on the anticipated attendance of **3,500 or more people** at stadium events. Simply identifying potential off-site parking locations without demonstrating that adequate, secure parking and transportation arrangements will actually be available is not sufficient to address the project's potential impacts.

O515

I believe the location and scale of this proposal warrant a thorough examination of alternatives that would provide the District with needed athletic facilities while better protecting the surrounding community and the American River Parkway.

O5-16

Thank you for considering my concerns and for ensuring that the environmental review fully addresses the potential impacts of this project.

O5-17

Sincerely,
Mark Baker

Thank you
Mark Baker
Treasurer, Sacramento Area Creeks Council
916-492-2249

Letter O6

From:	Cliff Feldheim
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 5:21:24 PM
Attachments:	RioAmericanoCommentLetter.docx

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Report Suspicious

Attached are comments from the Sacramento Bird Alliance, formerly Sacramento Audubon, on the *Rio Americano High School Stadium Project*. O6-1

Please add these to the official record.

Thank you!

Cliff
--
Cliff Feldheim
President
Sacramento Bird Alliance (formerly Sacramento Audubon)
Conservation Chair

Environmental Council of Sacramento
Habitat 2020 Committee Chair
American River Parkway Advisory Committee
American River Parkway Coalition

916-217-2920

SACRAMENTO
BIRD ALLIANCE

October 15, 2026

To whom it may concern,

I would like to express the concerns of the Sacramento Bird Alliance, formally Sacramento Audubon, regarding the intended stadium construction/expansion at Rio Americano High School. The proposed project includes an almost 800% increase in bleacher capacity, as well as substantial increase in noise and light pollution. These impacts may also extend beyond football season to include special events throughout the year. O6-2

The lower 23-mile stretch of the American River which runs from the Nimbus Dam to its confluence with the Sacramento River through the American River Parkway (Parkway) which is officially designated under both the California and National Wild and Scenic Rivers Acts (1972 and 1980, respectively). This stretch of river acts as an important habitat corridor for birds and may be critically important for birds migrating within the Pacific Flyway. The American River Parkway Plan recognizes these values and calls out the importance of the area for wildlife connectivity and as a habitat corridor for birds and other wildlife.

Over 200 species of birds have been observed using the Parkway. Many of these species nest for north of California in northern Canada and Alaska and migrate to destinations as far south as Mexico, Central America, and South America. These birds may stop in habitats along the Parkway to feed and rest for days to weeks during both north and south migrations. During this period, they are especially sensitive to human disturbance which can ultimately impact their ability to keep and put on weight, impacting their ability to migrate and nest successfully. Similarly, the Parkway is home to many species of nesting birds, which are similarly sensitive to human disturbance during the nesting period.

The proposed stadium expansion would result in significantly more people, light, and noise with the potential of this disturbance expanding from just football season to other special events that could occur throughout the year. The proposed expansion would encroach on the Parkway amplifying these impacts on birds and other wildlife. The Parkway has had increased development along its borders for many years, and this project contributes to that cumulative impact. As currently designed, this project is inconsistent with the American River Parkway Pan, and the DEIR is lacking in adequately evaluating the initial and cumulative impacts to birds and other wildlife. The DEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. O6-3 O6-4

Thank you for your time and consideration,

Cliff Feldheim

President

Sacramento Bird Alliance

PO Box 160694

Sacramento CA 95816

Letter O7

From:	Save the American River Association
To:	Rio Americano
Cc:	nicholas.arps@sanjuan.edu; mbassanelli@sanjuan.edu; wade.crowfoot@resources.ca.gov; bellase@saccounty.gov; dylan.wood@wildlife.ca.gov; boardmembers@sanjuan.edu; pcosta@sanjuan.edu; zima.creason@sanjuan.edu; nick.bloise@sanjuan.edu; tanya.kravchuk@sanjuan.edu; ben.avey@sanjuan.edu; manuel.perez@sanjuan.edu; fhanysha.gaddis@sanjuan.edu
Subject:	Comments on Draft Environmental Impact Report - Rio Americano High School Stadium Improvements Project
Date:	Friday, October 16, 2026 7:42:01 PM
Attachments:	2026-10-16-SARA-comments-Rio-Americano-stadium-DEIR.pdf SARA ltr to SJUSD 2010.04.20-1.pdf SJUSD ltr. 10.24.2022 re Portable Lights.pdf

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Report Suspicious

Dear Members of the Board and Mr. Arps,

Please see the attached comments from Save the American River Association on the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report (SCH No. 2026010094).

Please confirm via email that this letter has been received and include these materials and your responses in the Final EIR and the administrative record.

O7-1

Sincerely,

Sara Stephens
Office Manager
Save the American River Association (SARA)
Guardians of the American River and Parkway since 1961
8836 Greenback Lane, Ste. C, Orangevale, CA 95662 | (916) 936-4555 | www.sarariverwatch.org

SARA
SAVE THE AMERICAN

Save the American River Association

8836 Greenback Lane, Suite C • Orangevale, CA 95662
916-936-4555 • E-mail: info@SARAriverwatch.org • www.SARAriverwatch.org

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October 16, 2026

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

Via email: RioEIRComments@aecom.com

Re: Comments and objections to the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report, SCH No. 2026010094

Members of the Board and Mr. Arps:

On behalf of Save the American River Association (SARA), I submit these comments on the August 2026 Draft Environmental Impact Report (DEIR), released for public review on September 2, 2026. SARA opposes approval of the project as proposed. We ask the District to correct the deficiencies identified below, provide the supporting information needed for informed public review, and evaluate reasonable alternatives or a smaller improvement project before certifying the EIR for a proposed new stadium expansion. O7-2

SARA supports students' access to athletics, safe facilities, and a strong educational experience. Rio Americano's location beside the American River Parkway also creates a responsibility to protect a public resource of regional and statewide importance. Modern lighting equipment and an unchanged campus boundary do not, by themselves, establish that substantially expanded day and nighttime activity will preserve the adjoining habitat, natural quiet, scenery, and public enjoyment. O7-3

The principal questions are whether the District has described a representative baseline and a consistent operating program; whether it has evaluated effects on the actual Parkway receiving environment; whether the project complies with the American River Parkway Plan (ARPP) and applicable state law; and whether feasible alternatives can reduce potential significant Parkway impacts. SARA requests reasoned responses to each numbered section and its specific requests. O7-4

References to the DEIR use its printed page numbers. References to Appendices use PDF viewer page numbers, counting the cover as page 1. The DEIR and appendices are available on the District's project page. ARPP and Natural Resources Management Plan citations use their printed page numbers.

1. SARA's interest and the Parkway's public importance

O7-5

SARA was founded in 1961 to advance the establishment and protection of the American River Parkway. The ARPP recognizes that history in its description of the original SARA Park site, named for the organization that was instrumental in establishing the Parkway. These comments continue that institutional commitment. (ARPP, p. 172.)

O7-6

The Parkway is a narrow natural corridor within a heavily urbanized region. (see DEIR Exhibit 3-1 Regional Project Location) Its significance includes resident and migratory wildlife, connected upland and riparian habitat, water resources, recreation, scenic enjoyment, and opportunities for education. The ARPP treats preservation of natural qualities as "essential" while accommodating recreation and other authorized purposes. Its description of natural scenic values includes quiet, wildlife movement, birds and river sounds, and limited intrusion from urban views, light, and noise. Those values require evaluation beyond whether a fixture meets a numerical illumination recommendation. (ARPP, pp. 9–11, 15–17, and 77.)

O7-7

The Legislature has expressly recognized the Parkway's environmental, recreational, educational, and regional value. Public Resources Code section 5841.5 identifies the Parkway's public benefits and, in subdivision (e), states, "It is essential that the function of the lower American River and its environs, as a regional open-space resource within the … County of Sacramento, be supported and maintained". Section 5842(a) states "The legislature hereby adopts the American River Parkway Plan so as to provide coordinating with local agencies in the protection and management of the diverse and valuable natural land, water, native wildlife, and vegetation of the American River Parkway. Section 5842(b) states "**Actions of state and local agencies with the regard to land use decisions shall be consistent with the American River Parkway Plan** …." (emphasis added)

The Urban American River Parkway Preservation Act therefore provides the coordination that is central to this review. (Pub. Resources Code, §§ 5841.5, 5842.)

Assembly Bill 1716, enacted as Statutes 2016, chapter 375, reinforces this public purpose. Its findings identify the Parkway's statewide environmental and recreational significance, its fish and wildlife resources, its educational value, and its state and federal Wild and Scenic River designations. The enactment also supports conservation and restoration on adjacent lands. These provisions are relevant to the importance of protecting habitat function even when a source of disturbance is outside the Parkway. (AB 1716; Pub. Resources Code, §§ 5845.1, 5845.6, 5845.7(b).)

2. The 2010 record, the 2022 lighting letter, and a representative baseline

O7-8

SARA's April 20, 2010 comment letter on the Rio Americano High School Sports Facility Upgrades DEIR, SCH No. 2008072119, quoted the project description: "No nighttime lighting of the sports field is proposed." (attached) SARA explained its understanding that no sports-lighting standards or fixtures existed and that the improvements would not install infrastructure to facilitate later nighttime sports lighting. It also addressed Mitigation Measure 3.1-2a concerning security-lighting glare and requested responses in the Final EIR.

That correspondence establishes the issue raised and SARA's understanding. Please provide the final project description, responses to SARA's comments, approval resolution, findings, mitigation monitoring program, and later amendments or authorizations. Explain whether the final approval incorporated a limitation on sports lighting or related infrastructure, and whether any such requirement remains operative. The current DEIR's brief account of work in 2006 and improvements completed in 2019 does not resolve this history. (DEIR, p. 3-1.)

O7-8 (Cont.)

The District's October 24, 2022 letter to neighboring residents supplies a more specific operational record. (attached) Principal Cliff Kelly explained that later school dismissal and winter daylight conditions prompted portable lighting for evening practices beginning November 1, 2022, until further notice. The stated schedule was Monday through Friday until 8:30 p.m. through the winter months. That notice supports a limited winter practice use; it does not establish year-round lighting, large nighttime spectator events, or operations through 11:30 p.m.

O7-9

The DEIR describes eight diesel-powered portable LED towers, primarily used on winter weekdays, and relies on their continued use in its baseline and No Project Alternative. Please document when that use began, how it changed, and what approvals, exemptions, environmental review, rental records, and operating records apply. If the District concluded that the portable-light program was covered by an earlier approval, identify that approval and explain the determination. If it was a change to a previously reviewed project, disclose the analysis under Public Resources Code section 21166 and CEQA Guidelines section 15162, as applicable. The public deserves a documented explanation of the transition from the earlier no-nighttime-lighting representation to actual nighttime use.

CEQA's baseline is generally the actual physical environment. While an authorization challenge may not automatically remove existing lighting from that baseline, a hypothetical maximum operations cannot substitute for representative actual conditions. (CEQA Guidelines, § 15125(a))

O7-10

Please substantiate actual dates, seasons, hours, frequency, intensity, fixture locations, attendance, and accompanying amplification for a representative period surrounding the January 2026 Notice of Preparation. Separate winter practices from games and other events. Identify nights and hours when the field and neighboring habitat were dark. If another baseline period or approach is used, explain why it better represents existing conditions. A photograph or reading taken during a lit event cannot, without explanation, represent all evenings.

The comparison must identify the project's additional nighttime exposure, including evenings previously without activities. Improved directional lighting or elimination of diesel-generator noise may benefit some existing events. Those improvements do not establish that the full expansion in hours, crowd size, and event frequency would improve conditions throughout the adjoining Parkway. (DEIR, pp. 3-4, 3-6–3-7, 4.2-17–4.2-20, and 6-4–6-5.)

O7-11

3. Define the full project and reconcile its operating assumptions

O7-12

The project is a substantial intensification of stadium use. It would increase permanent seating from approximately 288 to 2,575 seats, install four 80-foot stadium-light poles, expand bleachers, add a press box, and provide six 15-foot pedestrian-light poles along the fire lane. Football games currently held off

campus would move to Rio. The environmental analysis should address that complete undertaking, including predictable event setup, clearance, amplified sound, bands, crowds, and access. (DEIR, pp. 3-4–3-9.)

O7-12 (Cont.)

Several descriptions need reconciliation before the exposure assumptions can be evaluated:

O7-13

Nighttime frequency. The aesthetics analysis describes approximately 40 evening or nighttime events plus up to 88 practice days. The biological analysis instead describes approximately 40 total evening or nighttime events encompassing other games, practices, and events, plus five to eight football games. The five practice categories in Table 3-1 total 112 maximum activity-days. These may overlap and therefore are not necessarily 112 separate nights, but the table does not explain the difference from 88. (DEIR, pp. 3-9, 4.1-20, and 4.2-18.)

O7-14

Hours and seasons. Practices generally end at 8 p.m.; games generally end earlier than football, which may continue until 11 p.m., followed by approximately 30 minutes of reduced lighting. Terms such as "generally" and "typically" are not enforceable maximums. Soccer, lacrosse, track, practices, and graduation create exposure outside the fall football season, including periods overlapping bird nesting or bat maternity activity. Provide a single calendar of anticipated and maximum lighting nights, hours, circuit settings, overlapping uses, and seasonal restrictions. (DEIR, pp. 3-7–3-9 and 4.2-18–4.2-20.)

O7-15

Attendance and community events. Page 3-8 identifies approximately 480 graduates and 920 guests, or 1,400 people, and anticipates no graduation attendance increase; Table 3-1 lists 3,500. The narrative describes community or other events averaging once monthly, while the table lists up to four assemblies/community events and four field days. Explain which categories overlap and which attendance assumptions govern transportation, parking, noise, lighting, and alternatives. Permanent seating capacity is not necessarily an attendance cap when participants or spectators occupy the field or other areas. Establish the maximum total attendance evaluated and any enforceable limit. (DEIR, pp. 3-7–3-9.)

O7-16

Equipment. The narrative's discussion of luminaire counts and configurations should be reconciled with Appendix B's 64-fixture system. Identify every fixture type, its function, which circuits operate for each activity, and whether the model represents ordinary use or a conservative maximum. This is particularly important for the ball-tracker and RGBU fixtures discussed below. (DEIR, p. 3-6; Appendix B, PDF pp. 3–5.)

O7-17

The District should also document how earlier field improvements, portable lighting, the permanent stadium, the proposed campus cell tower, and any sufficiently definite tennis-court relocation or other campus changes relate in planning, funding, and construction. CEQA requires review of the whole action, including foreseeable expansion that is a consequence of an initial project and would likely change its scope or effects. Independent projects may still require cumulative analysis. (CEQA Guidelines, §§ 15378(a), (c), 15165; CEQA Guidelines, § 15130.)

O7-18

4. Apply the Parkway's statutory protections and distinguish zoning questions

The ARPP is more than a contextual design reference. Public Resources Code section 5841(a) identifies the adopted 2008 Plan; section 5842(a) adopts it to coordinate protection and management of the Parkway's land, water, native wildlife, and vegetation. Section 5842(b) requires consistent state and local

land-use decisions, subject to enumerated qualifications. Those qualifications address matters such as flood-control works, specified water facilities and rights, and identified lands or proceedings. The statute contains no express school-district exception. If the District contends an exception covers this stadium decision, it should identify the particular provision and explain why. (Pub. Resources Code, §§ 5841(a), 5842(a)–(b).)

O7-18 (Cont.)

The DEIR's treatment is inconsistent. Its aesthetics and biological sections describe ARPP policies as not directly applicable because the project is outside the Parkway, while the land-use discussion acknowledges the statutory requirement for adjacent development to remain consistent with the Plan. An unchanged school-use designation and campus boundary do not resolve whether substantially intensified operations conflict with policies protecting neighboring resources. (DEIR, pp. 4.1-14–4.1-15, 4.2-12–4.2-14, 4.2-26–4.2-27, and 5.9-29–5.9-30.)

The Plan expressly addresses adjacent uses. Policies 7.19, 7.19.1, and 7.19.2 require jurisdictions to address adverse effects of adjacent activities and protect Parkway vegetation, wildlife, and recreation. Policies 7.23 and 7.24 address buffers and adjacent development visible from the Parkway, including scale, screening, design, and intrusive lighting. These policies require analysis of the receiving environment even when construction is confined to school property. Please provide a policy-by-policy explanation supported by the actual operating program and environmental evidence. (ARPP, pp. 111 and 114.)

Government Code section 53094 provides a qualified procedure under which a school board may render local zoning ordinances inapplicable. It does not authorize exemption from state statutes. If the District relies on that provision, identify its resolution, the covered parcels and uses, the required vote and procedural compliance, and the extent of the claimed exemption. The statute's limitations, including its treatment of nonclassroom facilities, require a use-specific explanation rather than an assumption that all school-related activity is either exempt or nonexempt. (Gov. Code, § 53094; CEQA Guidelines, § 15125(d).)

The land-use analysis also begins with "No Impact" but ends with a less-than-significant conclusion. It dismisses building and structure height and setback provisions because no new buildings are proposed, despite the proposed press box, bleachers, and four 80-foot poles. Please correct the conclusion and analyze the actual structures. Identify the applicability of Sacramento County Zoning Code section 4.7.3, including standards on lots protected by levees, separately from any claimed zoning exemption. (DEIR, pp. 3-1, 3-4, and 5.9-29–5.9-30.)

O7-19

Provide a common, georeferenced map showing the stadium, parcel boundaries, Parkway boundary, levee, trails, relevant zoning overlay, and habitat designations. Include the parcels identified in materials supplied to SARA as APNs 29202100190000 and 29202100210000, confirming or correcting their identification and boundaries. Different lines in the photometric exhibits should not be treated interchangeably as the school boundary, Parkway boundary, or trail.

Please provide an explanation of why the District believes the levee and bike path atop the levee south of the Rio campus is not part of the Parkway.

O7-20

5. Applicability of the Parkway Corridor Combining Zone

O7-21

The proposed Rio Americano stadium project is located on property zoned **RD-4/PC**, placing it within Sacramento County's Parkway Corridor Combining Zone (PCCZ) and subject to its requirements absent a valid statutory exemption. The American River Parkway Plan expressly identifies the PCCZ as regulating public and private property within and adjacent to the Parkway, including development affecting scenic and wildlife values through building height, lighting, noise, screening, and other features (ARPP, Chapter 11, pp. 225–226). Policy 7.24 further addresses regulation of adjacent development visible from the Parkway, including measures to discourage intrusive lighting (p. 114; see also Sacramento County Zoning Code §4.7). The Legislature expressly adopted the ARPP through Public Resources Code section 5842(a), and subdivision (b) requires state and local agency land-use decisions to be consistent with the Plan, subject to specified statutory provisions. Accordingly, SJUSD must identify the legal basis and scope of any claimed PCCZ exemption and separately demonstrate compliance with the state-law ARPP consistency requirement; an exemption from local zoning would not, by itself, establish an exemption from section 5842.

6. SJUSD's Obligations Under the Urban American River Parkway Preservation Act

SARA maintains that the San Juan Unified School District is subject to the land-use consistency requirement of the Urban American River Parkway Preservation Act, Public Resources Code section 5840 et seq. Section 5842(a) expressly adopts the American River Parkway Plan, and subdivision (b) requires state and local agency actions concerning land-use decisions to be consistent with that Plan, subject to specified provisions. Those provisions contain no school-district exemption. The Legislature also expressly recognized that state-agency actions can undermine local Parkway planning and enacted URAPPA to protect the Parkway and its resources.. (Public Resources Code §5841.5(f).)

O7-22

The proposed approval authorizes permanent structures, lighting, and associated operating uses on District property. SARA submits that these are land-use decisions within section 5842(b). The applicable Parkway protections include those expressly addressing adjacent development: Policy 7.19 requires jurisdictions to address adverse effects from adjacent land uses and activities, and Policy 7.19.1 requires structures to be located so that neither they nor associated activities damage Parkway plants or wildlife. (ARPP, p. 30.) These provisions make operational effects on the Parkway relevant even where the structures themselves stand outside its boundary.

SJUSD's role as CEQA lead agency imposes an additional obligation to discuss inconsistencies with applicable plans. (CEQA Guidelines §15125(d).) SARA requests a written, evidence-supported explanation of the project's consistency with the applicable Parkway policies, addressing lighting, wildlife connectivity, visual intrusion, and other operational effects. If the District contends that section 5842 does not apply, it should identify the precise statutory exemption and supporting authority. The Final EIR should provide a reasoned response to this objection under CEQA Guidelines section 15088, and the District should demonstrate compliance with the applicable state-law consistency requirement before approving the project.

7. Address the SARA Park Rio Americano restoration policies and the final NRMP

O7-23

Policy 10.29 states: "Any development or use of the Rio Americano area shall be consistent with the intent to reestablish the Oak-grassland biotic community." It appears in Chapter 2 at page 43 and in the SARA Park area plan at page 172. The ARPP describes **oak-grassland as a botanically diverse transition community becoming rare in California**. The biological analysis discusses Policies 10.27 and 10.28 but omits this directly relevant restoration policy. (ARPP, pp. 43, 58, and 172–173; DEIR, pp. 4.2-14 and 4.2-26–4.2-27.)

The omission is particularly significant because Public Resources Code section 5842(c) permits local amendments to Chapter 10 only when consistent with the state-adopted area policies in Chapter 2. Policy 10.29's inclusion in Chapter 2 therefore deserves express treatment. Read together with the Legislature's concern in section 5841.5(f) about agency actions negating local Parkway planning, these provisions support a focused request: explain whether stadium operations would impair the restoration objectives and what measures would prevent that result. (Pub. Resources Code, §§ 5841.5(f), 5842(c).)

O7-24

The policy's geography must be stated accurately. The Rio Americano area is the Parkway subarea north of the river adjoining the school; the policy does not automatically place the entire school campus within an oak-grassland restoration area. The map at page 174 shows a Limited Recreation strip beside the campus, Protected Area habitat farther toward the river, and a Developed Recreation area associated with oak-grassland restoration upstream. Those designations are not interchangeable. Please map the affected areas and analyze their particular resource purposes. (ARPP, pp. 172–174.)

O7-25

Policy 10.28 protects the Rio Americano wetland/lagoon area. Policy 10.27 concerns the original SARA Park site on the south bank and prohibits further development there. The area narrative describes riparian vegetation, historic channels, islands, lagoons, and wildlife habitat. The analysis should evaluate effects reaching each resource. (ARPP, pp. 42–43 and 172–174.)

O7-26

The final American River Parkway Natural Resources Management Plan (NRMP) is dated January 2023 and was approved by the County on February 28, 2023. Its foundation includes ARPP Policies 3.4 and 3.5 and the implementation program calling for integrated vegetation and wildlife management. AB 1716 also expressly supported development and funding of the NRMP through Public Resources Code sections 5845.3(b) and 5845.5(d). The final NRMP implements and supplements Parkway resource management. (County Parkway planning information; AB 1716; ARPP, pp. 17 and 230–231.)

The NRMP identifies a connected mosaic of riparian, woodland, grassland, and aquatic habitats supporting different life stages. It addresses movement along the river and connections between habitat types; wildlife movement should not be reduced to a single east-west line. Goal 1.6 and Measures 1.6a–1.6b address connectivity and barriers. Goal 4.5, Measure 4.5a, and section 7.4 address ambient artificial light, including reflected light and skyglow. Its SARA Park actions include potential valley oak riparian woodland and elderberry establishment on the right-bank upper berm, maintenance of drainage-slough flow, and management of informal trails. These are management opportunities, not a representation that restoration has already occurred. Please use this information to evaluate whether stadium operations would compromise habitat function or restoration goals for Oak-Grassland habitat and preserving riparian habitat. (Final NRMP, pp. 2-12, 2-14, 4-20–4-24, 7-16, and 8-71.)

8. Reconcile the lighting analysis and require habitat-specific conclusions

O7-27

SARA does not purport to provide a substitute lighting design. The DEIR and its own appendix nevertheless contain discrepancies that should be resolved by qualified professionals before conclusions are adopted.

The receiving environment is dark habitat. The DEIR classifies the school as LZ2/E2 but the adjacent Parkway as LZ0/E1, and states that neighborhood illumination does not extend into the Parkway corridor. It also acknowledges that the EPRI illuminance values it cites are recommendations rather than standards. The District should explain the biological and visual basis for applying a particular threshold to this dark receiving environment. A recommendation for property-line illumination is not, by itself, evidence of protection for habitat, river views, or night-sky conditions. (DEIR, pp. 4.1-11–4.1-12 and 4.1-19; CEQA Guidelines, § 15064.7.)

O7-28

"Zero" needs correction and geographical precision. Page 4.1-25 asserts zero off-site light trespass while reporting nonzero residential property-line illumination: 0.02–0.13 horizontal footcandle and 0.05–0.28 vertical footcandle. Appendix B's southern property-line calculations reach approximately 0.40 horizontal and 0.37 vertical footcandle. Those southern values should not automatically be described as illumination inside the legally defined Parkway, but they demonstrate illumination at the campus–levee interface. On the separate outer contour, many points opposite the stadium are displayed as 0.00; nonzero values also appear near the ends of the Parkway-facing portion, and the entire contour's maxima are 0.02 horizontal and 0.05 vertical footcandle. (Appendix B, PDF pp. 11–12, 17, and 19.)

O7-29

Please distinguish each calculation line from the actual Parkway boundary, trail, levee, vegetation, and wildlife habitat. State whether 0.00 is a rounded value and provide sufficient precision to evaluate the conclusion. Below a selected recommendation is not the same as zero. Sampling near ground level also does not resolve visibility of fixtures, exposure in tree canopies or aerial movement paths, or every effect on the river and lagoons.

O7-30

The soccer model and football-only restriction need reconciliation. The DEIR says the eight upward-facing ball-tracker fixtures would operate only during football. Yet the football and soccer calculation sheets both show Circuit A, 52 fixtures, 49.68 kW, and two ball-tracker fixtures per pole in the equipment schedule. Either the soccer calculation is a conservative maximum that does not represent intended operation, or the stated football-only restriction does not match the modeled configuration. Identify which is correct, provide the relevant calculations, and make any restriction enforceable. This matters to seasonal exposure and the biological analysis's reliance on the highest lighting output occurring during various sport and activity seasons. (DEIR, pp. 3-6, 4.1-25, and 4.2-19; Appendix B, PDF pp. 4–5.)

O7-31

Address reflected light and all fixture types. The DEIR defines skyglow to include upward or sideways light, including reflection, but the biological analysis reasons that other fixtures would not contribute because they point downward. Direction alone does not establish the absence of reflected light. Appendix B also lists four TLC-RGB-U fixtures on a separate RGBU circuit. Explain their purpose, output, operating schedule, and contribution to the analysis; do not leave an unexplained circuit outside the operating assumptions. (DEIR, pp. 4.1-16, 4.2-19, and 4.2-24; Appendix B, PDF p. 3.)

Please supply the project-specific assumptions and results needed to evaluate direct illumination, glare, reflected light, and skyglow at representative trail, canopy, lagoon, river, island, and opposite-bank receptors. Include relevant seasonal vegetation conditions and distinguish permanent screening from trees whose continued health or presence is uncertain. Evaluate the proposed spectrum and intensity in relation to affected wildlife, rather than assuming a sports-lighting certification answers that question. The request is for an appropriately scoped, professionally supported analysis, not an unsupported assertion that all detectable artificial light is necessarily significant. O7-32

9. DarkSky approval is not a substitute for completed CEQA analysis

Mitigation Measure 4.1-2 requires design submission, revision until a DarkSky "pass," and an approval letter before construction. The District should disclose any project-specific submission or approval already obtained and explain precisely what it establishes. The published DarkSky outdoor sports-lighting guidelines distinguish design approval from completed-installation certification following field verification. (DEIR, p. 4.1-26; DarkSky Outdoor Sports Lighting Guidelines, § 1.1.) O7-33

The operating program also needs reconciliation with the certification relied upon. DarkSky section 2.5.A requires automatic shutoff no later than 11 p.m., or an earlier applicable curfew. The DEIR allows football until 11 p.m. and approximately 30 additional minutes of reduced lighting. Identify how the proposed schedule complies, including which lights remain on for safe departure. Section 1.2.A excludes facilities located in specified sensitive zones, including LZ0/E1. Because the DEIR places the school in LZ2, adjacency alone does not establish ineligibility; it equally does not establish that approval protects the adjoining LZ0 Parkway. (DarkSky Guidelines, §§ 1.2.A and 2.5.A; DEIR, pp. 3-7 and 4.1-19.)

Please also address enforcement of any proposed lighting and sound standards or conditions if all or part of the project proposal is approved. Please address consideration of penalties and appropriate incremental increases in penalties for nonconformaity. O7-34

Where mitigation supports a less-than-significant finding, the Final EIR must identify the environmental performance to be achieved and explain why it protects the affected resources. Later design details may be permissible when supported by specific performance standards; an unresolved determination whether the project can protect habitat should not be deferred until after approval. Require enforceable operating limits, installation verification before regular use, measurements at appropriate Parkway receptors, reporting, and mandatory correction or suspension of noncompliant operation. (CEQA Guidelines, § 15126.4(a)(1)(B), (a)(2).) O7-35

10. Evaluate nighttime noise, bats, and functional habitat loss

The biological noise discussion acknowledges that no evening measurements were collected south of the project site, yet compares predicted stadium noise in affected Parkway habitat with daytime conditions. It predicts approximately 59–72 dBA Leq at 100 feet south, about 4–17 dBA above the measured daytime average of 55 dBA Leq. That comparison does not establish the increase above actual nighttime habitat conditions. The discussion also cites an existing maximum of approximately 84 dBA, then uses 78 dBA in a later comparison. Explain the discrepancy. SARA recognizes that other locations O7-36

were measured at night; the concern is the absence of representative nighttime data for this affected receiving area. (DEIR, p. 4.2-20; Appendix D, PDF p. 11.)

An occasional existing maximum is not equivalent to prolonged or repeated event noise. Leq describes average sound energy over an interval; Lmax describes a maximum. The District should evaluate the magnitude, duration, frequency, and timing of crowd, band, whistle, and amplified sound against representative nighttime conditions. Explain implications for communication, foraging, roosting, avoidance, and passage, using appropriate biological expertise. If trees or the levee are relied on for attenuation, substantiate their effect for the relevant seasons, sources and receptors.

O7-36 (Cont.)

Mitigation Measure 4.3-1b principally addresses amplified sound at residential receptors north and east of the stadium, including a 70 dBA Lmax test criterion. It does not supply a comparable Parkway habitat criterion or control the entire crowd and band contribution. The residential operational-noise impact remains significant and unavoidable. Different receptors can properly have different significance conclusions, but the contrast underscores the need for a supported habitat-specific analysis, not an assumption that residential PA testing protects every resource. (DEIR, pp. 4.3-25–4.3-27.)

O7-37

Appendix C's December 18, 2025 bat memorandum reports summer surveys of potential campus-tree roosts and no observed emergence there. It also identifies roosting potential in Parkway trees and records bats foraging over the stadium or adjoining swale. Acoustic identifications were not fully vetted; the report discusses calls consistent with possible Mexican free-tailed bat roosting nearby without confirming a roost. These results do not establish absence of bat use throughout adjoining Parkway habitat or all seasons. (Appendix C, PDF pp. 2–5.)

O7-38

The memorandum relies on screening by the intervening tree row to conclude that additional Parkway roost surveys are unnecessary. That assumption needs reconciliation with the actual lighting and noise exposure. Its recognition of higher-quality foraging habitat in the Parkway also makes continued availability of that habitat important. Please have a qualified bat biologist determine whether additional seasonal surveys or other evidence are needed to assess roosts, foraging, and movement in the affected area, and explain the basis for any conclusion that they are unnecessary. (Appendix C, PDF pp. 4–5; DEIR, pp. 4.2-18–4.2-21.)

O7-39

The DEIR corridor analysis suggests mobile wildlife could move away from disturbance. Displacement is an effect to evaluate, not proof that the effect is insignificant. Identify available alternative habitat, its capacity and accessibility, and whether repeated disturbance would reduce the usable width or continuity of the corridor. Evaluate local arrivals and departures, stopover habitat, movement between upland and riparian areas, and sensitive seasonal periods, as well as high-altitude migration. The absence of a fence or direct habitat removal does not answer whether visual intrusion, light and sound impair effective habitat use. (DEIR, pp. 4.2-24–4.2-25; ARPP, Policies 1.1 and 3.3, pp. 15 and 17; NRMP, § 4.3.)

O7-40

SARA asks whether effects on feeding, reproduction, survival, or passage could materially diminish Parkway habitat function. Those are potentially physical environmental effects under CEQA even if animals are not killed and vegetation remains standing. Appropriate professional evaluation should determine the likelihood and significance of those effects before certification; the present record should not be treated as proof that every possible effect will occur.

O7-41

11. Include aquatic insects and connections between river and terrestrial food webs

O7-42

The analysis should address ecological pathways beyond direct light falling on a bird nest or bat roost. Aquatic insects emerge from the river and provide food for terrestrial wildlife. Artificial light can affect emergence, adult attraction, orientation, and reproduction, with possible consequences for prey distribution and food availability. Effects during the night may influence feeding opportunities after daylight returns.

Recent research supplies a reason to examine these pathways, not a substitute for local evidence. Manfrin and colleagues reported reduced emergence and attraction of flying adult aquatic Diptera in experimental artificial-light conditions. Altered emergence and aggregation of adults around light are distinct effects; any effect on egg hatching would require separate evidence. (Manfrin et al. (2025), "Artificial light at night reduces emergence and attracts flying adults of aquatic Diptera," Aquatic Sciences 87:38, doi:10.1007/s00027-025-01161-7.)

Száz and colleagues documented a reproductive light-trap mechanism for a Danube mayfly at illuminated bridges, involving attraction to light and polarized reflections from surfaces. Rio's stadium is not a bridge, and the species, geometry, and surfaces differ. The study nevertheless identifies a pathway that a qualified reviewer can assess for relevance rather than disregard. (Száz et al. (2015), "Lamp-Lit Bridges as Dual Light-Traps for the Night-Swarming Mayfly, Ephoron virgo: Interaction of Polarized and Unpolarized Light Pollution," PLOS ONE 10(3):e0121194, doi:10.1371/journal.pone.0121194.)

Please evaluate whether the proposed fixtures would be visible to insects moving from the river or lagoons, whether direct, reflected illumination, or light spectrum would reach relevant insect or aquatic habitat, and whether attraction or altered prey availability could affect birds, bats, or fish. Identify local taxa or functional groups, seasonal overlap, relevant fixture spectrum, and realistic exposure. A visible light source may not automatically be proof of attraction from a dark environment or that the water surface is illuminated; equally, a near-ground trail reading does not resolve all attraction or food-web effects. Where a pathway is dismissed, explain the site-specific evidence supporting that conclusion.

12. Effects of Stadium Lighting on Insects, Wildlife, and Parkway Connectivity

O7-43

SARA objects to the DEIR's insufficiently supported conclusions concerning the effects of stadium lighting on insects and the wildlife that depend on them. The brightly illuminated field depicted on the DEIR cover page raises a reasonable question about the ecological effects of introducing substantial nighttime illumination adjacent to the American River Parkway. Although the cover does not quantify actual light exposure or establish biological harm, it illustrates an issue that requires analysis: whether the illuminated stadium, visible fixtures, reflected light, and resulting skyglow would alter insect behavior, prey distribution, and wildlife use of the adjoining corridor.

The DEIR acknowledges that artificial lighting can attract insects and affect wildlife foraging and behavior, but largely resolves these concerns through predictions of no light spill into the Parkway, seasonal limitations, and the availability of alternative habitat. (DEIR, pp. 4.2-18–4.2-19.) These considerations do not adequately address all relevant exposure pathways. Direct spill is light falling beyond the intended illuminated area. Visible fixtures and glare involve the brightness of sources against

their surroundings. Reflected light comes from illuminated turf, bleachers, buildings, and other surfaces. Skyglow results from atmospheric scattering of light emitted or reflected upward. Downward aiming therefore does not establish the absence of skyglow, as recognized by the DEIR's own definition at page 4.1-17 and by ANSI/IES TM-37-22, *Description, Measurement, and Estimation of Sky Glow*, sections 2.1.2 and 4.2.

O7-43 (Cont.)

Peer-reviewed research establishes mechanisms warranting evaluation here. Fabian et al. (2024), *Why flying insects gather at artificial light*, found that artificial sources can disrupt insect flight orientation, producing circling, stalling, and entrapment near lights. Manfrin et al. (2017) found that artificial lighting altered aquatic-insect emergence and aggregation and affected predator communities in an experimental riparian setting. Dyer et al. (2023), *Insect communities under skyglow*, documented changes in the timing and location of insect movement under diffuse nighttime illumination. These studies do not quantify the proposed stadium's effects, but they identify plausible mechanisms that selected ground-level light-spill calculations do not resolve.

These concerns extend to wildlife connectivity. A corridor can remain physically unobstructed while becoming less usable because wildlife avoids illuminated areas or insect prey is diverted from established foraging habitat. Experimental research has demonstrated disruption of bat commuting routes by lighting. (Stone et al. (2009), *Street Lighting Disturbs Commuting Bats*.) Accordingly, the DEIR's emphasis on the absence of physical barriers and the small footprint of lighting poles does not adequately support its conclusion of no lighting impact on wildlife movement. (DEIR, pp. 4.2-24–4.2-25.)

Agency guidance supports further review. In its January 3, 2024 comments on the St. Ignatius Field Lighting Project, page 6, the California Department of Fish and Wildlife identified effects on insects and their predators and recommended evaluation of lighting intensity, spectrum, extent, and timing, together with existing-versus-proposed illumination diagrams and post-construction verification. Although that letter concerns another project, its recommendations are directly relevant to the issues presented here.

SARA therefore requests a site-specific ecological lighting assessment addressing direct and reflected light, source visibility, skyglow, spectrum, and exposure at biologically relevant heights. The District should disclose unrounded photometric results and explain whether its model includes reflection and atmospheric scattering. It should evaluate the complete operating schedule—including practices, games, community events, and cleanup—and assess effects on insect movement, prey availability, and wildlife corridor use. Where mitigation is necessary, it should establish enforceable requirements for shielding, aiming, spectrum, output, operating hours, field verification, and corrective action. The cover image alone does not establish a significant impact; equally, selected values displayed as "0.00" footcandles do not establish the absence of ecological effects.

13. Evaluate visible structures and natural scenery with verified sightlines

O7-44

The project's effects on Parkway scenery are broader than whether structures and measured illumination exceeds a recommendation. The enlarged bleachers, press box, poles, and visible lights should be evaluated from representative trail, levee, river, island, and opposite-bank viewpoints, including seasonal

gaps in vegetation. The ARPP's natural scenic values include views out of the Parkway and relief from urban intrusion. (ARPP, p. 77; DEIR, §§ 4.1 and 5.13.)

O7-44 (Cont.)

The DEIR uses several distances with different endpoints: approximately 450 feet from the site to the river, approximately 125 feet between the stadium's southern edge and the Parkway, and approximately 225–460 feet between poles and the trail. It also describes the levee as approximately 10 feet above the Parkway/trail. These figures are not necessarily contradictory, but they cannot be combined as though they share a surveyed horizontal and vertical reference. Provide cross-sections showing actual stadium grade, levee crest, trail and water elevations, structure positions, observer locations, and vegetation. (DEIR, pp. 4.1-8, 5.8-25–5.8-26, 5.9-29, 5.13-33, and 6-5.)

The following simplified illustration shows why a low intervening levee does not establish complete screening of tall structures. It is not a site survey or an expert visibility conclusion. Assume a 450-foot horizontal distance from structure to observer, the observer's eye 5 feet above a common ground datum, a levee crest 10 feet above that datum, and the crest 10 feet from the structure toward the observer. The 450-foot value is only an illustrative proxy drawn from the DEIR's site-to-river discussion; the 10-foot crest setback and common datum are hypothetical.

Sightline height at levee = H - [(H - 5) x 10 / 450].

For a 21.5-foot bleacher seating height, the sightline at the crest is 21.13 feet, or 11.13 feet above the assumed crest. Including a 5-foot rear backing produces H = 26.5 feet and a sightline of 26.02 feet, or 16.02 feet above the crest.

For an approximately 34-foot press-box/railing height, the sightline is 33.36 feet, or 23.36 feet above the crest. For an 80-foot stadium pole, it is 78.33 feet, or 68.33 feet above the crest. For the separate proposed 90-foot cell tower, it is 88.11 feet, or 78.11 feet above the crest; that last example concerns cumulative scenery, not stadium equipment.

Under these assumptions, the structure height whose sightline just touches the crest is (10 x 450 - 5 x 10) / (450 - 10) = 10.11 feet. Actual visibility may differ substantially with surveyed elevations, alignment, vegetation, and intervening objects. The appropriate response is to verify the geometry and provide representative simulations, rather than infer that a roughly 10-foot levee screens structures of substantially greater height. No maximum viewing distance can be established from this illustration alone.

The alternatives discussion also contains an apparent directional error: it first explains that moving the stadium north would move its lighting away from the Parkway, then states that the same alternative would place sports lighting closer to the Parkway. Please correct that passage and determine whether the underlying comparison must change. (DEIR, p. 6-7.)

O7-45

14. Address Parkway recreation, closing hours, and induced access

O7-46

The recreation discussion reasons that there would be no Parkway recreationists during nighttime events because the Parkway is closed after dark. This is too categorical and ignores that the Parkway includes many resources. Sacramento County Code section 9.36.067 generally restricts entry or remaining in the Parkway from one hour after sunset until sunrise, or during other posted closure hours, and includes

exceptions for authorized activities and commuting between origins and destinations outside the Parkway. The District should apply the actual rule and exceptions rather than assume either unrestricted nighttime use or complete absence of lawful users. (Sacramento County Code, § 9.36.067(A)–(B); DEIR, § 5.13, p. 5.13-33 and continuation on PDF p. 196, printed p. 5.14-34.)

O7-46 (Cont.)

Even when public access is restricted, the Parkway remains wildlife habitat. Closing hours do not eliminate effects on natural nighttime light and sound conditions. Daytime and dusk views also remain relevant, as do authorized evening users. The ordinance regulates human access; it does not itself allows every light source and sound audible from neighboring land into the Parkway merely because no human is in the Parkway to experience the intrusion.

Please coordinate with County Regional Parks on foreseeable event-related walking and cycling, gathering near the levee or trail, informal viewing areas, litter, restroom demand, and off-trail movement. Explain how the commuting exception applies to proposed access patterns. Provide enforceable routes, signage, staffing, cleanup, and habitat-protection measures where warranted. An absence of population growth does not demonstrate an absence of intensified use or physical effects from a new concentration of spectators.

15. Expand the cumulative analysis to affected Parkway resources

O7-47

Table 7-1 identifies the proposed campus cell tower, Jesuit stadium improvements, and the Ralph Richardson modernization. The cumulative analysis should also examine other reasonably foreseeable activities affecting the same habitat and scenic corridor, with an explained geographic and temporal scope. The relevant question is whether this project's contribution is cumulatively considerable in combination with other effects, not merely whether all projects share a construction footprint. (CEQA Guidelines, §§ 15130, 15355; DEIR, pp. 7-2–7-3.)

The American River Common Features 2016 flood-risk-management work is a material example. A November 20, 2025 federal preliminary-injunction order describes Contracts 3B and 4B as affecting approximately 3.3 miles of riparian forest and reports that Contract 3B authorizes removal of 675–715 trees and trimming of more than 1,100, associated with riverbank erosion protection. The order enjoined Contract 3B ground or vegetation disturbance pending a merits decision; it did not finally decide the case. (American River Trees v. Central Valley Flood Protection Board, No. 2:25-cv-02384-DC-CSK (E.D.Cal. Nov. 20, 2025), order, pp. 1–2.)

Please verify the current design and litigation status, review the May 2025 final supplemental environmental analysis, and map relevant Contract 3B, 4A, and 4B work in relation to the Rio Americano/SARA Park area. Distinguish completed, authorized, enjoined, and proposed work and the actual overlap of resources affected. The tree figures above concern Contract 3B and should not be presented as a count of removals immediately beside the stadium. Assess cumulative habitat loss, restoration delays, vegetation screening, disturbance, and passage constraints wherever the projects affect connected resources.

These effects may interact even if construction does not occur simultaneously. Habitat loss elsewhere may diminish alternatives for displaced wildlife; vegetation changes may alter screening; recurring stadium disturbance may reduce the usefulness of remaining habitat or restoration sites. These

possibilities require a supported assessment, not an assumption that impacted wildlife may merely move elsewhere or that the Parkway will experience no relevant development. Any exclusion should be explained by current evidence and the resources affected.

O7-47 (Cont.)

The 90-foot campus cell tower should be evaluated as an unlighted structure if that remains its proposed design, particularly for cumulative scenery. Identify the status and scope of any tennis-court relocation, including whether lighting is proposed, before deciding whether it belongs in the analysis. Concurrent Rio and Jesuit events also warrant consistent assumptions for transportation, neighborhood activity, and any shared Parkway effects including noise and light impacts. SARA does not contend that every future campus idea is a reasonably foreseeable project; the District should disclose the basis for its inclusion or exclusion decisions.

O7-48

16. Protect public use and address nuisance and public-trust concerns

O7-49

The Parkway's physical resources include the ecological functions that allow wildlife to feed, reproduce, shelter, and move. Impairment of those functions can diminish a public resource even without a conventional injury to a building or removal of a tree. SARA requests evidence and professional evaluation of potential impairment, while recognizing that the elements of a nuisance or other legal claim must be established separately.

Civil Code sections 3479 and 3480 address interference with property enjoyment and rights shared by the public. A public nuisance requires substantial and unreasonable interference. Harmful interference with the public's use of protected parkland or river-dependent resources warrants examination supported by evidence. (Civ. Code, §§ 3479–3480) The District should identify any claimed statutory authorization for a substantial adverse burden on neighboring public resources.

ARPP Policy 1.4 also addresses adverse de facto uses of public Parkway lands. If repeated stadium disturbance would substantially deprive an area of its intended habitat or public-use function, the District should explain consistency with that policy. SARA does not contend that every spill of light creates an easement, or that an easement is necessarily required for every off-site effect. Existing activity should not, however, be treated as automatically establishing a prescriptive entitlement to burden public property or a right to continue a public nuisance. (ARPP, Policy 1.4, p. 16; Civ. Code, §§ 1007, 3490.) The public trust supplies a related basis for careful analysis of river-dependent resources.

Fish and Game Code section 711.7(a) separately recognizes fish and wildlife as held in trust for the public and assigns the Department of Fish and Wildlife its trustee role. I did not see in the DEIR wildlife-agency review of functional habitat loss, connectivity, and food-web effects. These issues remain relevant to CEQA and ARPP. (Fish & G. Code, § 711.7(a).)

The ARPP's treatment of permanent lighting and amplification within the Parkway further explains its protective purpose. Policies 5.27.2(o) and (p) prohibit permanent lighting facilities, except security lighting, and permanent sound-amplification facilities within the Parkway. Those location-specific prohibitions do not automatically apply to equipment outside the boundary. They should nevertheless inform analysis under the policies expressly governing adjacent uses, so that off-site operations do not defeat the resources those policies protect. (ARPP, Policy 5.27.2(o)–(p).)

17. Coordinate protection of the Wild and Scenic River

O7-50

The ARPP also serves as a management framework for the state-administered federal section 2(a)(ii) river. The lower American River is designated under the California Wild and Scenic Rivers Act. Public Resources Code section 5093.61 directs state agencies to exercise existing powers to protect designated rivers' free-flowing condition and extraordinary values and directs local agencies to exercise their powers consistently with the Act. Pursuant to that the ARPP was adopted. PRC section 5093.60 provides for coordination through the California Natural Resources Agency. Please disclose the record of that consultation or explain why it was not performed. (Pub. Resources Code, §§ 5093.54(e), 5093.60, 5093.61.) The direct questions here are compliance with applicable federal and state law and the ARPP, and adequate analysis of effects on river resources. (ARPP, pp. 9 and 90–91; 16 U.S.C. §§ 1273(a)(ii), 1278(a).)

18. Evaluate targeted improvements combined with continued shared facilities

O7-51

The DEIR identifies significant and unavoidable construction noise and operational event noise after mitigation. It also concludes that the No Project Alternative would avoid the proposed project's significant operational stadium-noise impact. A meaningful alternative capable of reducing that effect is therefore central to the decision, not an optional discussion of preferences. (DEIR, pp. 4.3-26–4.3-27 and 6-13.)

O7-52

The stated objectives include enhancing the campus as a center of community, accommodating school activities, allowing cooler-hour use, improving the athletic experience, and increasing scheduling flexibility. Those are legitimate objectives, but they do not expressly require 2,575 permanent seats, four 80-foot poles, or relocation of every major event to the Parkway boundary. The District should distinguish current service levels, documented unmet needs, operational inconvenience, and desired enhancements. CEQA does not require proof of hardship before a school improves its facilities; it does require a meaningful comparison of potentially feasible ways to achieve most basic objectives while reducing significant effects. (CEQA Guidelines, § 15126.6(a)–(d); DEIR, pp. 3-10 and 6-3.)

Objectives should not be defined so narrowly that they make the preferred project inevitable. At the same time, the District may reasonably value on-campus activities.

The DEIR does consider El Camino and other existing stadiums. El Camino is approximately three miles away by road, has high-mast lighting, and accommodates approximately 3,000 people. Continued use is included in No Project; Hornet and Hughes stadiums are discussed separately and rejected from detailed analysis. The gap is the absence of a distinct intermediate alternative combining targeted Rio improvements with continued off-campus use for major events. (DEIR, pp. 6-4–6-5.)

O7-53

The DEIR describes most existing on-campus competitions as attracting approximately 50–120 spectators, with nonfootball events below the existing 288-seat capacity. Its account of graduation attendance is internally inconsistent, as discussed above. Please identify which activities need additional capacity and how much. Provide evidence of unavailable dates, scheduling conflicts, participation barriers, transportation expense, or lost instructional time if those factors are relied upon to reject continued shared use. The District's 2022 letter identifies a particular winter-practice scheduling

problem; that problem should be evaluated separately from the desire for high-attendance nighttime football. (DEIR, pp. 3-6–3-9.)

SARA acknowledges the benefits identified for moving games to Rio, including convenience and potential reductions in driving. For the modeled maximum-attendance football event, the DEIR estimates 19,077 vehicle miles at El Camino and 16,980 at Rio, a reduction of 2,097 vehicle miles for that event. This benefit should be weighed alongside localized noise, light, access, and habitat effects. (DEIR, pp. 4.4-10–4.4-11.)

O7-53 (Cont.)

Please evaluate an alternative with these components:

1. Continue varsity home football at El Camino and graduation or other exceptionally large events at an established off-campus venue.
2. Retain serviceable athletic improvements and provide targeted seating, accessibility, and safety improvements sized to documented campus needs.
3. Evaluate limited practice-lighting improvements, including appropriate electrical or battery-powered equipment, with professionally designed control of spill, glare, and ecological exposure.
4. Establish enforceable limits on attendance, amplification, lighting circuits, hours, frequency, and seasonal use.
5. Support ordinary athletics, daytime assemblies, and compatible school activities without requiring the full high-attendance nighttime operating program.

O7-54

Engineering and operational feasibility must be investigated. Shorter poles should not simply be assumed to reduce glare or spill, and alternative equipment should not be presumed adequate without analysis. The question is whether the combined package would accomplish most basic objectives while reducing the crowd-noise and Parkway effects of the preferred project.

The two detailed alternatives do not answer that question. No Project retains existing operations; the other alternative moves and reconstructs the stadium farther north while relocating fields and portions of parking/solar facilities and retaining essentially the proposed capacity and equipment. The DEIR finds the relocation alternative reduces no overall impact category and increases several. Comparing existing operations with extensive campus reconstruction does not explain exclusion of a smaller improvement program. (DEIR, pp. 6-5 and 6-17.)

O7-55

Please also distinguish the statement that No Project meets none of the enhancement objectives from the different proposition that existing facilities provide no underlying educational or athletic service. Because No Project is identified as environmentally superior, expressly identify and explain the environmentally superior alternative among the remaining alternatives, as CEQA Guidelines section 15126.6(e)(2) requires.

O7-56

19. Provide the economic information relevant to feasibility and public priorities

A purely financial objection does not establish a significant environmental effect. Nevertheless, economic and social factors must be considered with technological and environmental factors when

O7-57

determining whether changes that reduce significant impacts are feasible. If the necessary information is outside the EIR, it must be supplied in the decision-making record. The project description must also provide a general description of economic characteristics. (CEQA Guidelines, §§ 15131(a), (c), 15124(c).)

O7-57 (Cont.)

Please compare the preferred project's capital and continuing operating costs with targeted improvements and continued shared use, including maintenance, staffing, utilities, replacement, transportation, and venue charges. If cost is used to reject an alternative, provide the comparative evidence. Substantial alternative costs do not establish infeasibility without an adequate comparison to the proposed project.

Information reported to SARA, which we request the District confirm or correct, indicates approximately $8.9 million in Rio athletic-facility spending during the past decade, a proposed stadium cost exceeding $10 million, and approximately $40 million in repair and improvement needs identified in a 2024 campus assessment. SARA also understands that the assessment assigned an overall C grade, with roofing D, interior finishes F, plumbing C−, electrical D+, and site conditions D. These figures and grades are not presented as independently verified findings. Please provide the underlying assessment, expenditure records, current estimates, and an explanation of work already completed or funded.

Using the reported figures only as an illustration: $10 million / $40 million = 25 percent. This comparison does not establish that the same funds can lawfully pay for every competing need. It does justify asking how the stadium ranks against urgent deficiencies and which improvements are eligible for the same funding. Identify the 2019 athletic improvements, their remaining useful life, and what the project would retain, modify, or replace. (DEIR, pp. 3-1 and 6-5.)

The school's published Class of 2027 information identifies Memorial Auditorium for graduation. SARA has received an unverified estimate of approximately $15,000 for annual rental; please disclose the actual contract and all associated expenses. If that figure is accurate and unchanged, $15,000 x 30 years = $450,000, and $450,000 / $10,000,000 = 4.5 percent. This is a limited arithmetic illustration, not a life-cycle or return-on-investment analysis: it excludes inflation, financing, campus operating costs, and the stadium's other benefits. It shows why avoided graduation rental alone would provide limited financial support for the full investment.

The District's Facilities Master Plan uses condition assessments, modernization costs, useful-life information, deferred maintenance, and a prioritization rubric approved March 11, 2025. Please disclose the stadium's ranking and comparison with Rio's classroom, roofing, plumbing, electrical, and site needs. For current financial context, the Board's September 8, 2026 summary reports acceptance of 2025–26 unaudited actuals and revisions to the 2026–27 budget. Use those current records to explain the proposed capital funding and ongoing operating commitment, applicable restrictions, and effects on other eligible priorities.

The Parkway is also an educational asset. California Department of Education guidance supports environmental literacy through classroom instruction, outdoor learning, local parks, and Parkway stakeholder partnerships.

Protecting habitat beside the campus preserves opportunities for ecological observation, watershed studies, and field-based learning. Any new program would need curriculum, staffing, accessibility,

permissions, and protection of sensitive areas. Such educational opportunities inform the Board's broader public-benefit decision; they do not replace the need to evaluate the targeted athletic improvement alternative on its own merits.

O7-57 (Cont.)

19. Requested revisions, enforceable commitments, and responses

Before certification, SARA requests an integrated revision that resolves the issues above and supports its conclusions with disclosed evidence. In particular, the District should:

1. Disclose the prior approval and lighting records, substantiate representative baseline conditions, and state a single internally consistent project and operating program.
2. Map the affected boundaries, habitats, restoration areas, and receptors; analyze ARPP consistency under Public Resources Code section 5842; and separately explain any local zoning exemption.
3. Reconcile the lighting model, fixture circuits, seasonal use, and "zero" claims; obtain representative nighttime noise information; and assess habitat function, bats, insects, food-web connections, scenery, and induced access with appropriate professional expertise.
4. Update cumulative assumptions for connected Parkway resources and reasonably foreseeable projects, including current flood-protection work and other campus or nearby improvements.
5. Evaluate the targeted-improvements/shared-facility alternative and disclose the operational and economic evidence necessary to assess its feasibility.
6. Adopt any necessary mitigation with clear performance standards, responsible personnel, funding, monitoring locations and schedules, public reporting, mandatory corrective action and enforcement. Conditions should specify measurable operating limits and what happens when they are exceeded, including restrictions or suspension where necessary to maintain compliance.

O7-58

Please provide substantive responses to the significant environmental issues raised, identifying the facts and reasoning supporting each conclusion rather than relying on general assurances about modern lighting or existing campus development. Make supporting studies and referenced approvals available so that the public and decision-makers can assess the conclusions. (CEQA Guidelines, § 15088(c).)

If the resulting information meets the criteria for significant new information under CEQA Guidelines section 15088.5, recirculate the affected analysis before certification. This includes, where the rule applies, disclosure of a new significant effect, a substantial increase in an effect, or a substantially different feasible alternative or mitigation measure that would clearly lessen significant effects but is declined. The request is tied to the regulatory criteria, not to an assertion that every correction automatically requires recirculation. (CEQA Guidelines, § 15088.5(a).)

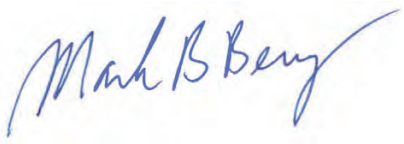
If significant impacts remain, any approval must include supported findings on mitigation and alternatives and, where required, a statement explaining why identified benefits outweigh unavoidable effects. A statement of overriding considerations cannot replace adequate environmental analysis, the required findings, or compliance with independently applicable law. (Pub. Resources Code, §§ 21002, 21081; CEQA Guidelines, §§ 15091, 15093.)

O7-59

Please include this letter, SARA's April 20, 2010 correspondence, the District's October 24, 2022 neighbor letter, and the supporting materials identified in the responses in the administrative record. Please also provide SARA notice of the Final EIR's availability and any hearing or decision on certification and project approval. O7-60

The District has an opportunity to improve student facilities while respecting the natural setting that makes Rio Americano distinctive. SARA urges a decision grounded in the Parkway's statutory protections, its actual ecological functions, and a fair comparison of less damaging ways to meet the school's needs. O7-61

Respectfully submitted,



Mark Berry
President
Save the American River Association

cc: San Juan Unified School District Board Members

Tanya Kravchuk, President
Manuel Perez, Vice President
Nick Bloise, Clerk
Zima Creason, Member
Pam Costa, Member
Ben Avey, Member

SJUSD General Counsel, Fhanysha Gaddis

Liz Bellas, Director, Sacramento County Regional Parks Department

Dylan Wood, Senior Environmental Scientist, California Fish & Wildlife

Wade Crowfoot, Secretary, California Natural Resources Agency

Save the American River Association Board of Directors

O7-10
Cont'd

San Juan Unified School District

Rio Americano High School
Telephone (916) 971-7494
www.sanjuan.edu

Kent Kern, Superintendent
Frank Camarda, Chief Operations Officer
Cliff Kelly, Principal

October 24, 2022

Re: Rio Americano High School, 4540 American River Dr, Sacramento, CA 95864
Extended Use of Portable Lights During Evening Sports Practice

Dear Rio Americano High School neighbor,

San Juan Unified School District would like to update you regarding the use of portable lighting on the football field at Rio Americano High School. The district will be implementing the use of lighting during evening sports practices on the football field, effective Nov. 1, until further notice.

In order to comply with a new state law, most San Juan Unified schools were required to push start and end times later, affecting all before and after school activities. In conjunction with the upcoming daylight savings time change, the district will need to utilize evening lighting Monday-Friday until 8:30 p.m., through the winter months.

We appreciate your patience as we recognize this may be potentially inconvenient. We would also like to thank you for being a valued neighbor and for your support of the San Juan Unified community.

If you have questions or would like to discuss this further, please feel free to contact me at (916) 979-8860 or cliff.kelly@sanjuan.edu.

Kind Regards,

Cliff Kelly
Principal, Rio Americano High School
San Juan Unified School District
cliff.kelly@sanjuan.edu

916-482-2551 • E-mail: info@SARAriverwatch.org • www.SARAriverwatch.org

O7-08
Cont'd

2010 Board of Directors
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Ken Press
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Ron Suter
Stephanie Taylor
Linda Villatore
Leo Winternitz

April 20, 2010

San Juan Unified School District
Planning and Property Management Division
10700 Fair Oaks Blvd., Room 9
Fair Oaks, CA 95628

Attn: Cynthia Jensen, Director

Subject: **Comments on Draft Environmental Impact Report (DEIR) for the Rio Americano High School Sports Facility Upgrades SCH #2008072119**

The DEIR does not appear to recognize the role of the County Department of Regional Parks, with respect to the American River Parkway. The American River Parkway Plan (see page 216) provides that this Department is responsible for (a) providing comment and recommendations on issues of adjacent projects that may impact the Parkway and (b) administration and implementation of the vision and policy directives of the American River Parkway Plan. Therefore, the Department of Regional Parks is an agency responsible for determination of the accuracy of conclusions in the DEIR regarding compliance with the Parkway Plan and impacts on the Parkway. Further, Mitigation Measure 3.1-1a (related to screening landscaping) must be revised to include consultation with the Department in the selection and planting of screening vegetation to mitigate visual impacts on the Parkway.

The Project Description in the DEIR states that "No nighttime lighting of the sports field is proposed." We understand this and other similar statements in the DEIR as meaning that (a) there are no lighting standards or fixtures currently existing on the sports fields and (b) nothing will be constructed or installed as part of, or in conjunction with, the Sports Facility Upgrades to facilitate the future addition of nighttime lighting of the sports fields. We also understand Mitigation Measure 3.1-2a to require that security lighting to be designed to reduce nighttime light and glare for the Parkway.

We look forward to reading the responses to the above comments in the Final Environmental Impact Report.

Respectfully submitted,

Warren V. Truitt
President

cc: Ms. Janet Baker, Director – Regional Parks Department

Letter O8

From:	Brenda Gustin
To:	Rio Americano
Cc:	nicholas.arps@sanjuan.edu; mbassanelli@sanjuan.edu; fhanysha.gaddis@sanjuan.edu; legalservices@sanjuan.edu; info@sanjuan.edu; pcosta@sanjuan.edu; zima.creason@sanjuan.edu; nick.bloise@sanjuan.edu; tanya.kravchuk@sanjuan.edu; ben.avey@sanjuan.edu; manuel.perez@sanjuan.edu; boardmembers@sanjuan.edu
Subject:	Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report - SCH No. 2026010094
Date:	Friday, October 16, 2026 11:16:00 PM
Attachments:	Sierra Club Comment Rio Americano High School Improvements DEIR 10.16.26.docx

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Please confirm via email that my formal comment on behalf of the Sierra Club Sacramento Group Mother Lode Chapter regarding the Rio Americano High School Stadium Improvements Project - Draft Environmental Impact Report (DEIR) has been received. Thank you. O8-1

Dear Mr. Arps,
Please see the attached comment regarding the Rio Americano High School Stadium DEIR from the Sierra Club Sacramento Group Mother Lode Chapter.
Sincerely,

Brenda Gustin, Ph.D.
Sierra Club Mother Lode Chapter
Sacramento Group



Sierra Club Comment Letter - Rio Americano HS Stadium DEIR

Sierra Club Sacramento Group
909 12th Street, Suite 118
Sacramento, CA 95814

October 16, 2026

Nicholas Arps
Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue, Carmichael, CA 95608
Submitted by email to RioEIRcomments@aecom.com

Re: Comments on the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report — SCH No. 2026010094

Dear Mr. Arps,

On behalf of the Sacramento Group of the Sierra Club and our members in the Sacramento region, we submit these comments on the Draft Environmental Impact Report (DEIR). The Sierra Club opposes the project as proposed. Its location immediately adjacent to the American River Parkway presents serious conflicts with the preservation of this regional natural resource, and the DEIR acknowledges significant noise impacts even after mitigation. Other identified impacts are not adequately identified or reviewed for impact or mitigation. O8-2 O8-3

The proposed site, adjacent to the state-protected American River Parkway, is not suitable for a high-intensity sports and events stadium, and the DEIR confirms that the project's most serious impacts have not been identified or cannot be mitigated. The proposed new stadium complex is no further than its own length from the riparian habitat of the American River, which is the planned distance light and noise is to travel in the stadium complex. (DEIR Exhibit 4.3-2) O8-4

The Sierra Club is a longstanding environmental advocacy organization and Parkway stakeholder, which includes through Sierra Club representation on the American River Parkway O8-5

Advisory Committee. We are deeply concerned about protecting the Parkway's natural qualities. A river within both the state and federal Wild and Scenic River systems flowing through a major metropolitan area offers an exceptional example of how human communities and the natural environment can coexist. Protecting that relationship requires development at the Parkway's edge to respect its wildlife, natural quiet, darkness, scenic character, and existing laws and regulations to protect those natural qualities necessary for its passive recreational enjoyment. O8-5 (Cont.)

The American River Parkway Plan (ARPP), page 9, identifies preservation of the Parkway's natural qualities as essential and states that the Plan serves as the management plan for the federal and state Wild and Scenic Rivers Acts. Its protections address both Parkway uses and impacts from adjacent property. Policies 7.19–7.19.2 address adverse effects of adjacent uses on plants, wildlife, and recreation; Policies 7.23–7.24 address screening and visible adjacent development, including intrusive lighting. The Plan expressly identifies the County's Parkway Corridor Combining Zone (PCCZ) as an implementation mechanism (ARPP, pp. 111–114). O8-6

The Legislature adopted the ARPP through the Urban American River Parkway Preservation Act. Public Resources Code section 5842(a)–(b) expressly adopts the Plan and requires state and local agency land use decisions to be consistent with it, subject to specified exceptions. The District's DEIR identifies the campus zoning as RD-4/PC and acknowledges the Plan's statutory role yet asserts that Parkway zoning standards are not directly applicable (DEIR, pp. 3-4 and 5.9-29–5.9-30). Please demonstrate compliance with these protections or identify the precise legal basis for treating any requirement as inapplicable. If relying on Government Code section 53094, identify the relevant Board action and explain why a local zoning exemption would displace the separate state-law consistency requirement. O8-7

We understand the district's goal of providing athletic facilities and events at each of its high schools. The question under the California Environmental Quality Act (CEQA) is not whether the goal is reasonable, but whether this project, at this location can meet it without significant and avoidable harm. We believe the proposed scale and operations are inappropriate here. The proposed project would expand seating from 288 to approximately 2,575, install four 80-foot light poles, a PA system and accommodate graduation and indeterminate sporting activities and events with attendance capacity to approximately 3,500. The campus also offers exceptional opportunities for science education centered on the Parkway (DEIR, pp. 3-4–3-9). O8-8

1. Significant noise impacts remain after mitigation O8-9

The DEIR finds construction noise and high-attendance stadium event noise significant and unavoidable after mitigation (DEIR, pp. 4.3-26–4.3-27). That finding does not excuse further consideration of feasible noise reduction or alternatives. Public Resources Code section 21002 directs agencies to avoid approving projects as proposed when feasible alternatives or mitigation would substantially lessen significant effects.

If the District nevertheless approves the project, it must make findings supported by substantial evidence, including specific reasons for rejecting identified mitigation or alternatives as O8-10

infeasible, and adopt a supported Statement of Overriding Considerations (CEQA Guidelines, § 15091 and § 15093). An overriding statement accepts residual harm; it does not mitigate that harm or establish compliance with other laws. O8-10 (Cont.)

The DEIR evaluates a No Project alternative and an on-campus reconfiguration and discusses other stadiums. It must explain why continued use of El Camino High School, already used for home football games and approximately three miles away, cannot meet essential athletic needs while avoiding new Parkway impacts. A preference for an on-campus venue does not establish feasibility. O8-11

Under CEQA Guidelines section 15126.6, the district should also evaluate: O8-12

- A reduced-capacity facility without permanent stadium lighting or an expanded public address system and activities coordinated with wildlife management.
- Targeted improvements to the existing track and field without increased spectator capacity, combined with continued use of existing off-site venues for major events.

These alternatives warrant comparison against clearly defined needs, scheduling constraints, costs, and environmental effects. Any mitigation relied upon must include enforceable commitments and performance standards; essential protections cannot be left to unspecified future plans (CEQA Guidelines, § 15126.4(a)). O8-13

2. Specific deficiencies remain unresolved in the DEIR O8-14

Event noise. Mitigation Measure 4.3-1b includes speaker controls, a 70 dBA Lmax residential property-line limit for the public address system, and restrictions after 10 p.m. These do not cap total crowd, band, and bleacher noise or establish a comparable Parkway receptor standard. Using Appendix D, disclose combined peak and average levels at residences and sensitive Parkway locations, the reduction each measure achieves, and remaining impacts. Explain the scope of the claimed County Noise Ordinance exemption, including community or rental events; an ordinance exemption does not eliminate CEQA impacts. O8-15 Require event monitoring, public reporting, and corrective measures, including operational restrictions where necessary (DEIR, pp. 4.3-15–4.3-16 and 4.3-22–4.3-27). O8-16

Lighting and visual intrusion. Mitigation Measure 4.1-2 requires a DarkSky design approval, but the DEIR does not demonstrate that this alone protects Parkway habitat, wildlife, and scenic values. Explain how modeled readings of 0.00 footcandle at selected locations establish the absence of meaningful exposure, accounting for reporting precision, visible luminaires, upward ball-tracker lighting, reflected light, spectrum, and skyglow. O8-17 Evaluate the ecological implications of the proposed 5,700 K lighting and feasible warmer-spectrum alternatives. O8-18 Require measurable limits, shielding, binding curfews, and verification after installation. O8-19 The Parkway's nighttime closure does not protect wildlife from light, noise or remove views of tall structures some of which will be occupied by people (DEIR, pp. 4.1-18–4.1-26 and 4.2-17–4.2-19; Appendix B). O8-20

Project description. The DEIR supplies estimated schedules but repeatedly uses “generally,” “usually,” and “typically.” It permits football until 11 p.m., followed by approximately 30 minutes of lighting, while noise mitigation calls for scheduling events to end by 10 p.m. Reconcile these provisions and specify enforceable maximum attendance, events, lighted nights, operating hours, and community or rental uses. Analyze the reasonably foreseeable maximum operation, rather than relying on historical averages (DEIR, pp. 3-6–3-9 and 4.3-26). Moreover, demonstrate how this will not impact the specifically identified habitat, wildlife and the efficacy of the wildlife corridor.

O8-21

O8-22

Operating commitments. Incorporate the Night Event Management Standards and necessary facility-use rules into binding project conditions and the mitigation monitoring program. Identify responsible personnel, inspection and reporting requirements, complaint response deadlines, and corrective-action triggers. Specify how staffing, security, parking, lighting, and amplified-sound restrictions will protect both neighborhoods and the Parkway, including preventing event-related access contrary to Parkway closure rules. Explain consistency with the ARPP and applicable PCCZ provisions (DEIR, p. 3-6; CEQA Guidelines, § 15126.4(a)).

O8-23

O8-24

Baseline. The baseline must reflect actual, representative conditions when environmental review began. The baseline must extend a meaningful review and analysis into the Parkway environment it may impact and provide the frequency, season, duration, and intensity of existing activities and resources evaluated. Comparisons to isolated selected events must not obscure the additional hours, attendance, and seasonal exposure the project would introduce (CEQA Guidelines, § 15125(a)).

O8-25

Biological resources. Appendix C acknowledges potential operational harm to bats yet relies on four summer emergence surveys and assumed screening by trees. Explain how this supports conclusions about winter use, seasonal roosting, repeated disturbance, and loss of foraging habitat. Explain other species that were identified, the analysis, and why they were not evaluated substantively in the DEIR. The DEIR’s conclusion that animals can relocate or find other habitat does not establish that acknowledged potential displacement is harmless. Evaluate combined light and noise effects on bats, birds, insects, aquatic resources, and wildlife movement throughout the operating year, and all anticipated uses and events. Require additional mitigation where warranted (DEIR, pp. 4.2-17–4.2-21; Appendix C, pp. 2–4).

O8-26

O8-27

Cumulative impacts. Table 7-1 already lists the approved 90-foot campus cell tower and Jesuit stadium lighting. The issue is the adequacy of the combined-effects analysis. Provide an integrated assessment of the tower and stadium’s visual intrusion from Parkway viewpoints, and of overlapping lighting, event noise, and traffic from relevant projects. Explain other potential environmental impacts on the Parkway considered and why they were not included in the cumulative impact consideration. Explain how the combined exposure affects the river corridor, rather than relying on each project’s individual conclusions (DEIR, Chapter 7, including Table 7-1).

O8-28

Traffic, parking, and safety. Mitigation Measures 4.4-3a–4.4-3c propose shared parking at Jesuit and an event transportation plan. Demonstrate that sufficient scheduling, spaces, safe crossings, staffing, and emergency access can actually be secured for peak attendance, including graduation. Make any necessary attendance reduction a clear, enforceable condition if parking arrangements fail. Address full-crowd evacuation and concurrent nearby events before operation; observing problems at the first major event cannot substitute for adequate advance planning. Appendix F's vehicle-miles-traveled analysis does not resolve these separate issues (DEIR, pp. 4.4-15–4.4-18). O8-29

3. Concurrence with Save the American River Association comments

The Sierra Club supports the comments submitted by the Save the American River Association (SARA), dated October 16, 2026, and incorporates them by reference. We request substantive written responses to the environmental issues raised in both letters. O8-30

4. Requests

For these reasons, the Sierra Club asks the district to: O8-31

- Decline to approve the project as proposed or select a feasible alternative that avoids or substantially lessens its significant effects and complies with applicable Parkway protections.
- Provide a specific, supported explanation of compliance with the ARPP, UARPPA, PCCZ, and applicable state and federal Wild and Scenic River protections, identifying the basis for any claimed exemption. O8-32
- Correct the identified deficiencies and recirculate the affected portions if the revisions disclose significant new information or otherwise meet CEQA Guidelines section 15088.5. O8-33
- Provide substantive written responses under CEQA Guidelines section 15088, and notify us when the Final EIR becomes available and of all hearings considering the project, including the currently scheduled November 17, 2026, Board meeting. O8-34

Thank you for your consideration.

Sincerely,

Brenda Gustin
Chairperson
Sierra Club Sacramento Group
Mother Lode Chapter

Letter O9

From:	andrea.willey@mac.com
To:	Rio Americano
Cc:	nicholas.arps@sanjuan.edu; Dylan@Wildlife Wood
Subject:	Comments on Draft EIR – Rio Americano High School Stadium Improvements Project (SCH 2026010094)
Date:	Tuesday, October 13, 2026 12:46:03 AM
Attachments:	Willey Comments EIR 10.12.26.pdf Willey Comments 1.1.26.pdf Willey Comments 11.5.25.pdf

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Dear AECOM and San Juan Unified School District,

Please find attached my comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH Number 2026010094). I have also attached my previous comments on this project, which include supporting scientific references and documentation of wildlife observations at mile 11 of the American River Parkway. O9-1

Thank you for the opportunity to comment. Please include these materials and your responses in the Final EIR and the administrative record.

Sincerely,
Andrea Willey, MD
Waterbird Habitat Project

Waterbird Habitat Project

October 13, 2026

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

cc: San Juan Unified School District Board of Education
California Department of Fish and Wildlife, North Central Region

RE: Comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH Number 2026010094)

Dear Mr. Arps and Members of the Board of Education,

Founder of the Waterbird Habitat Project, a California 501(c)(3) nonprofit focused on protecting wildlife habitat along the American River Parkway, I regularly observe and document wildlife at mile 11 of the Parkway, immediately adjacent to the Rio Americano High School campus and the existing Raider Stadium. The American River is the only federally and state-protected Wild and Scenic River flowing through a major U.S. city. Existing school activities are already clearly audible from the levee and trail and disrupt wildlife. I have previously submitted comments on this project documenting these conditions (attached). O9-2

I am writing to address the Draft Environmental Impact Report for the proposed stadium improvements, which include four 80-foot high-mast LED light standards, expansion of bleacher seating from approximately 288 to 2,575 people, an upgraded public address system, and a new press box. The project site is located directly adjacent to the American River Parkway and the federally and state-designated Wild and Scenic American River, separated only by the levee. The Draft EIR's analysis of impacts on Parkway wildlife is incomplete, and the project as currently proposed should not proceed without substantial revision or additional analysis. These deficiencies mean the Draft EIR does not comply with CEQA's requirements for a good-faith analysis of significant impacts, feasible mitigation, and a reasonable range of alternatives capable of reducing those impacts. O9-3

1. Significant and Unavoidable Operational Noise Impacts (Impact 4.3-1)

The Draft EIR correctly identifies that operational stadium event noise remains significant and unavoidable even after Mitigation Measure 4.3-1b (distributed downward-directed speakers, volume limits, event end times around 10 p.m., and restrictions on artificial noisemakers). Construction noise is also potentially significant. Existing events are already audible at mile 11 and disrupt wildlife behavior. While conducting research and habitat work on mile 11 during school events, I have heard the noise and observed waterbirds leaving the ponds and adjacent habitat in response. Expanding O9-4

seating capacity nearly nine-fold and enabling more frequent evening and night events will substantially increase both the intensity and frequency of this disturbance. Residential noise standards are not the appropriate threshold for assessing effects on biological receptors in adjacent Parkway habitat. O9-4 (Cont.) O9-5

Peer-reviewed literature, including Shannon et al. (2016) synthesizing two decades of research on the effects of noise on wildlife, documents that intermittent elevated noise (often exceeding 70 dB during events) reduces foraging efficiency in nocturnal mammals, interferes with bird communication and nesting success, alters bat activity, and stresses turtles. My local observations of disruption are consistent with these findings. Wildlife displacement is an adverse effect under CEQA. The Board will need to adopt a Statement of Overriding Considerations for this impact; the project benefits do not outweigh the permanent degradation of sensitive habitat. O9-6

2. Operational Biological Resource Impacts Are Underanalyzed O9-7

The Draft EIR concludes that operational impacts on special-status species and wildlife movement are less than significant, relying primarily on light-modeling results showing zero footcandle trespass at the Parkway boundary and the intermittent nature of noise. Construction mitigations (Mitigation Measures 4.2-1a through 4.2-1e for northwestern pond turtle, nesting birds, valley elderberry longhorn beetle, and best management practices) address only temporary effects.

The operational analysis is incomplete for these reasons: O9-8

• No event-timed noise or light measurements were taken on the levee or along the Jedediah Smith Memorial Trail.

• Bat surveys were limited (foraging confirmed; roosting not detected in the 2025 surveys) and do not evaluate effects during peak evening foraging hours. O9-9

• Northwestern pond turtle analysis focuses on construction exclusion and does not adequately evaluate operational noise and light effects on basking, dispersal, or nesting near the levee. O9-10

• There is no analysis of bobcats or other nocturnal mammals known to use the area. I have documented a family of five bobcats, including three kittens, that regularly live and hunt at night in the area immediately behind the school and along the Parkway edge at mile 11. I have also observed western pond turtles nesting next to the stadium fence, and waterbirds that reside year-round, foraging and roosting in the adjacent ponds and nesting in the surrounding riparian forest. These site-specific observations demonstrate active, ongoing use of the area by sensitive species that the Draft EIR does not adequately address. O9-11

• Synergistic effects of artificial light and noise, insect attraction, and chronic intermittent disturbance are not quantified. Studies on artificial light at night further show disorientation and altered foraging in bats and nocturnal mammals (e.g., Stone et al. 2015). O9-12

I request multi-season surveys (camera trapping for mammals, event-timed monitoring for birds and turtles, and expanded bat assessments) and either recirculation of the Draft EIR or a supplemental analysis that evaluates these operational impacts. O9-13

3. Alternatives Analysis Should Give Greater Weight to Relocation Away from the Parkway

Alternative 2 would demolish and rebuild the stadium at the northeastern end of the campus, adjacent to and south of American River Drive, approximately 875 feet north of the American River Parkway (versus the current location roughly 100–125 feet from the Parkway). It includes the same lighting, seating, PA system, and press box, plus a 100-foot-wide evergreen landscape buffer. Other athletic fields would shift south. O9-14

This alternative better reduces operational noise and light impacts on the Parkway while still meeting the project objectives. The No Project Alternative is environmentally superior for noise, lighting, and biological resources. The Draft EIR should more thoroughly evaluate the feasibility of Alternative 2 or a refined hybrid that further restricts night use or lighting intensity. The current proposed location maximizes adjacency impacts on sensitive habitat.

4. Lighting Analysis and Consistency with Parkway Policies

The Draft EIR relies on modeling (Appendix B) claiming zero light trespass at the Parkway edge and requires an International Dark-Sky Association "pass" rating as Mitigation Measure 4.1-2. Permanent 80-foot poles will replace portable diesel towers and enable more frequent and longer night use. O9-15

Even directional LEDs produce skyglow and can attract insects, altering food webs for bats and birds and affecting nocturnal predators. The project's adjacency to the Parkway Corridor and Wild and Scenic River raises consistency concerns with the American River Parkway Plan policies that require minimizing adverse impacts from adjacent land uses on wildlife, aesthetics, and lighting. O9-16

Cumulative effects with existing school activities and other nearby projects further support the need for redesign. O9-17

Requests

Recirculation or supplemental analysis is needed so that the Final EIR can meet CEQA's standards for substantial evidence and consideration of alternatives that lessen significant impacts on the Parkway. I respectfully request that the District: O9-18

1. Recirculate the Draft EIR or prepare a supplemental analysis that includes expanded wildlife surveys, independent verification of lighting and noise modeling against real-world conditions at mile 11, and a fuller evaluation of relocation alternatives. O9-19

2. Give serious consideration to Alternative 2 or a refined alternative that relocates stadium facilities farther from the levee and river, or that substantially restricts permanent night lighting and amplified events. O9-20

3. Coordinate with the California Department of Fish and Wildlife (Region 2), Sacramento County Regional Parks, and relevant Parkway advisory bodies before finalizing the EIR. O9-21

4. Require post-approval adaptive monitoring of noise, light, and wildlife response with enforceable contingencies if any version of the project is approved. O9-22

I am prepared to provide supporting observations, photographs, field notes, and a compilation of relevant scientific literature (including the references from my prior comments) upon request. O9-23

Please include these comments and your written responses in the Final EIR and the administrative record.

O9-24

Thank you for your consideration.

Sincerely,



Andrea Willey, MD

Founder, Waterbird Habitat Project

Comments on Proposed Stadium Improvements, Including Lights, Speakers, and Cell Tower at Rio Americano High School

Submitted by: Andrea Willey, MD
Waterbird Habitat Project

Date: January 1, 2026

The American River, the only federally and state-protected wild and scenic river in a U.S. city, supports thousands of wildlife species, including bobcats, coyotes, beavers, otters, salmon, and hundreds of waterbirds. Stadium lights and loudspeakers threaten this ecosystem with noise pollution and intense lighting. Studies show crowd noise, often exceeding 70 decibels, disrupts beaver dam-building, coyote foraging, turtle nesting, and bird migration. I have observed western pond turtles, a near-threatened species, nesting next to the stadium fence. Research confirms stadium lights over 100 lux disorient nocturnal species like bats and bobcats, causing population declines. A family of five bobcats, including three kittens, currently live behind the school. Environmental studies show a 90-foot cell tower near the American River Parkway risks fragmenting habitats, harming all wildlife, including beavers and otters, and riparian plants like willows, which provide shaded waters for fish spawning. In addition, traffic studies show increased event traffic heightens wildlife-vehicle collision risks for species like coyotes. Federal and state laws mandate protecting this biodiverse ecosystem.

O9-25

O9-26

O9-27

Additionally, the American River Parkway Plan (2008) identifies ongoing environmental impacts in the Parkway from large-scale developments and high-use areas, including noise intrusion disrupting wildlife, light pollution affecting nocturnal behaviors, stormwater runoff and litter degrading water quality, and habitat degradation from overuse and fragmentation. Examples include areas like Cal Expo and the State Fair downstream. These impacts are already sufficient and require ongoing mitigation; replicating similar disturbances at mile 11 near Rio Americano High School is unnecessary and would compound cumulative effects on more sensitive upstream wildlife corridors and habitats.

O9-28

Rio Americano High School was established in 1963, before modern environmental review laws (CEQA). At that time, Sacramento's population and the school's scale were far smaller, and large-scale lighted evening events with amplified sound were not anticipated adjacent to the Parkway. Unforeseen regional growth — including recent migration driven by Bay Area tech expansion — has already increased the school's footprint and impacts. The proposed stadium upgrades would further intensify noise, light, and traffic in this sensitive area, amplifying cumulative effects beyond anything originally contemplated. The area adjacent to the school contains one of the Parkway's few remaining open pond spaces — critical habitat for

O9-29

O9-30

waterbirds and wildlife that should be protected, not developed — offering students a unique living laboratory for environmental education.

O9-30 (Cont.)

The proposed stadium upgrades at Rio Americano High School, including lights, speakers, and a cell tower, prioritize benefits for approximately 1,867 students while risking irreversible harm to the American River Parkway—a federally and state-protected wild and scenic river that attracts over 5 million visitors annually, more than Yosemite's over 4 million. This jewel of Sacramento supports endangered species and serves as a vital ecological refuge for millions of Californians and national tourists who value its wildlife, water quality, and recreational opportunities. We must weigh these numbers: a small group's convenience versus the broader public good of preserving this irreplaceable resource.

O9-31

Sincerely,

Andrea Willey, MD
Waterbird Habitat Project

References

Noise Pollution Impacts on Wildlife

1. Shannon, G., McKenna, M. F., Angeloni, L. M., Crooks, K. R., Fristrup, K. M., Brown, E., ... & Wittemyer, G. (2016). A synthesis of two decades of research documenting the effects of noise on wildlife. Biological Reviews, 91(4), 982-1005. https://sites.warnercnr.colostate.edu/soundandlightecologyteam/wp-content/uploads/sites/146/2020/11/biologicalreviews2015.pdf
2. Kunc, H. P., McLaughlin, K. E., & Schmidt, R. (2019). The effects of anthropogenic noise on animals: A meta-analysis. Biology Letters, 15(11), 20190649. https://royalsocietypublishing.org/doi/epdf/10.1098/rsbl.2019.0649
3. Duarte, C. M., Chapuis, L., Collin, S. P., Costa, D. P., Devassy, R. P., Eguiluz, V. M., ... & Juanes, F. (2020). Evidence of the impact of noise pollution on biodiversity: A systematic map. Environmental Evidence, 9(1), 1-27. https://environmentalevidencejournal.biomedcentral.com/track/pdf/10.1186/s13750-020-00202-y.pdf
4. Dooling, R. J., & Popper, A. N. (2007). The effects of highway noise on birds. California Department of Transportation. https://www.researchgate.net/publication/228381219_The_Effects_of_Highway_Noise_on_Birds/download

O9-32

Light Pollution Impacts on Bats and Bobcats

1. Seewagen, C. L., LaGreca, J., & Adams, A. M. (2023). Far-reaching displacement effects of artificial light at night in a North American bat community. Journal of Mammalogy, 104(6), 1327-1336. https://www.researchgate.net/publication/374751284_Far-reaching_displacement_effects_of_artificial_light_at_night_in_a_North_American_bat_community/download
2. Stone, E. L., Harris, S., & Jones, G. (2015). Dark matters: The effects of artificial lighting on bats. In Bats in the Anthropocene: Conservation of bats in a changing world (pp. 187-213). Springer. https://www.researchgate.net/publication/286443735_Dark_Matters_The_Effects_of_Artificial_Lighting_on_Bats/download
3. Gail, S. M., LaGreca, J., Adams, A. M., & Seewagen, C. L. (2024). Artificial light at night (ALAN) pollution alters bat lunar chronobiology. Ecological Processes, 13(1), 1-14. https://ecologicalprocesses.springeropen.com/track/pdf/10.1186/s13717-024-00491-y.pdf
4. Hoffman, J., Schierwagen, J., & Penteriani, V. (2020). Effects of artificial light at night on the foraging behavior of an endangered nocturnal mammal. Environmental Pollution, 263, 114566. https://www.researchgate.net/publication/340634928_Effects_of_artificial_light_at_night_on_the_foraging_behavior_of_an_endangered_nocturnal_mammal/download

O9-33 (Cont.)

Cell Tower Habitat Fragmentation

1. Helgen, K. M. (1988). River otters as agents of water loss from beaver ponds. Northwest Science, 62(2), 65-70. https://www.researchgate.net/publication/272588969_River_Otters_as_Agents_of_Water_Loss_from_Beaver_Ponds/download
2. Devon Wildlife Trust. (2019). Appendix 3: Beaver ecology and key factors informing future management. Devon Wildlife Trust. https://www.devonwildlifetrust.org/sites/default/files/2019-07/Appendix%203.pdf
3. Semlitsch, R. D., & Bodie, J. R. (2003). Biological criteria for buffer zones around wetlands and riparian habitats for amphibians and reptiles. Conservation Biology, 17(5), 1219-1228. https://www.researchgate.net/publication/227519234_Biological_Criteria_for_Buffer_Zones_Around_Wetlands_and_Riparian_Habitats_for_Amphibians_and_Reptiles/download
4. National Council for Air and Stream Improvement (NCASI). (undated). TB908: Riparian zone forest management. NCASI. https://www.ncasi.org/wp-content/uploads/2019/02/tb908.pdf

O9-34

Wildlife-Vehicle Collision Risks

1. Gehrt, S. D. (2004). Ecology of coyotes in urban landscapes. Proceedings of the Vertebrate Pest Conference, 21, 303-311. https://www.researchgate.net/publication/252881542_Ecology_of_coyotes_in_urban_landscapes/download

O9-35

2. Federal Highway Administration (FHWA). (2008). Wildlife-vehicle collision reduction study: Report to Congress. U.S. Department of Transportation. https://www.fhwa.dot.gov/publications/research/safety/08034/08034.pdf
3. Borg, K., Jensen, M. B., & Seiler, A. (2020). Wildlife-vehicle collisions - Influencing factors, data collection and research methods. Transportation Research Procedia, 48, 2168-2185. https://www.researchgate.net/publication/344285425_Wildlife-vehicle_collisions_-_Influencing_factors_data_collection_and_research_methods/download
4. Sugden, S. M., Sanderson, D., Ford, K., Stein, L. Y., & St. Clair, C. C. (2024). Impacts of urban heterogeneity... on coyote survival. Urban Ecosystems, 27(5), 1357-1368. https://link.springer.com/content/pdf/10.1007/s11252-024-01643-w.pdf

O9-35 (Cont.)

Additional References

1. Sacramento County. (2008). American River Parkway Plan. https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/AmericanRiverParkwayPlan.pdf
2. Wikipedia Contributors. (2025). Rio Americano High School. https://en.wikipedia.org/wiki/Rio_Americano_High_School
3. San Juan Unified School District. (2025). District History. https://www.sanjuan.edu/history
4. Fair Oaks Historical Society. (2025). Local School History Archives. https://fairoakshistoricalsociety.org/schools
5. California Department of Education. (2025). Rio Americano High School Enrollment Data. https://www.cde.ca.gov/ds/sd/sd/filesenr.asp (Enrollment as of 2024-25 school year: 1,867 students)
6. U.S. Census Bureau. (1960). Sacramento Population Data. https://www.census.gov/data
7. U.S. Census Bureau. (2025). Sacramento Metropolitan Area Population Estimates. https://www.census.gov/quickfacts/sacramentorosevillefolsommetroareacalifornia
8. Sacramento Area Council of Governments. (2025). Regional Growth Projections. https://www.sacog.org/regional-planning
9. World Population Review. (2025). Sacramento Population History. https://worldpopulationreview.com/us-cities/sacramento-ca-population
10. California Department of Finance. (2025). Population Estimates and Projections. https://dof.ca.gov/forecasting/demographics/estimates
11. Sacramento Bee. (2024). Tech Migration from Bay Area to Sacramento. https://www.sacbee.com/news/business/technology/article289345234.html
12. Brookings Institution. (2024). Remote Work and Migration Trends in California. https://www.brookings.edu/research/remote-work-and-the-geography-of-talent
13. CBRE. (2025). Sacramento Tech Market Report. https://www.cbre.com/insights/reports/us-tech-talent-report-2024

O9-36

14. U.S. Census Bureau. (2023). Migration Flows Data. https://www.census.gov/topics/population/migration.html

O9-36
(Cont.)

Comments on Stadium Lights, Speakers, and Cell Tower at Rio Americano High School
Andrea Willey, MD
Waterbird Habitat Project

O9-37

The American River, the only federally and state-protected wild and scenic river in a U.S. city, supports thousands of wildlife species, including bobcats, coyotes, beavers, otters, salmon, and hundreds of waterbirds. Stadium lights and loudspeakers threaten this ecosystem with noise pollution and intense lighting. Studies show crowd noise, often exceeding 70 decibels, disrupts beaver dam-building, coyote foraging, turtle nesting, and bird migration. I have observed western pond turtles, a near-threatened species, nesting next to the stadium fence. Research confirms stadium lights over 100 lux disorient nocturnal species like bats and bobcats, causing population declines. A family of five bobcats, including three kittens, currently live behind the school. Environmental studies show a 90-foot cell tower near the American River Parkway risks fragmenting habitats, harming all wildlife, including beavers and otters, and riparian plants like willows, which provide shaded waters for fish spawning. Traffic studies show increased event traffic heightens wildlife-vehicle collision risks for species like coyotes. Federal and state laws mandate protecting this biodiverse ecosystem.

O9-38

O9-39

References:

Noise Pollution Impacts on Wildlife

O9-40

1. Shannon, G., McKenna, M. F., Angeloni, L. M., Crooks, K. R., Fristrup, K. M., Brown, E., ... & Wittemyer, G. (2016). A synthesis of two decades of research documenting the effects of noise on wildlife. *Biological Reviews*, 91(4), 982-1005. https://sites.warnercnr.colostate.edu/soundandlightecologyteam/wp-content/uploads/sites/146/2020/11/biologicalreviews2015.pdf

2. Kunc, H. P., McLaughlin, K. E., & Schmidt, R. (2019). The effects of anthropogenic noise on animals: A meta-analysis. *Biology Letters*, 15(11), 20190649. https://royalsocietypublishing.org/doi/epdf/10.1098/rsbl.2019.0649

3. Duarte, C. M., Chapuis, L., Collin, S. P., Costa, D. P., Devassy, R. P., Eguiluz, V. M., ... & Juanes, F. (2020). Evidence of the impact of noise pollution on biodiversity: A systematic map. *Environmental Evidence*, 9(1), 1-27. https://environmentalevidencejournal.biomedcentral.com/track/pdf/10.1186/s13750-020-00202-y.pdf

4. Dooling, R. J., & Popper, A. N. (2007). *The effects of highway noise on birds*. California Department of Transportation. https://www.researchgate.net/publication/228381219_The_Effects_of_Highway_Noise_on_Birds/download

O9-41

Light Pollution Impacts on Bats and Bobcats

5. Seewagen, C. L., LaGreca, J., & Adams, A. M. (2023). Far-reaching displacement effects of artificial light at night in a North American bat community. *Journal of Mammalogy*, 104(6), 1327-1336. https://www.researchgate.net/publication/374751284_Far-reaching_displacement_effects_of_artificial_light_at_night_in_a_North_American_bat_community/download

6. Stone, E. L., Harris, S., & Jones, G. (2015). Dark matters: The effects of artificial lighting on bats. In *Bats in the Anthropocene: Conservation of bats in a changing world* (pp. 187-213). Springer. https://www.researchgate.net/publication/286443735_Dark_Matters_The_Effects_of_Artificial_Lighting_on_Bats/download

7. Gail, S. M., LaGreca, J., Adams, A. M., & Seewagen, C. L. (2024). Artificial light at night (ALAN) pollution alters bat lunar chronobiology. *Ecological Processes*, 13(1), 1-14. https://ecologicalprocesses.springeropen.com/track/pdf/10.1186/s13717-024-00491-y.pdf

8. Hoffman, J., Schierwagen, J., & Penteriani, V. (2020). Effects of artificial light at night on the foraging behavior of an endangered nocturnal mammal. *Environmental Pollution*, 263, 114566. https://www.researchgate.net/publication/340634928_Effects_of_artificial_light_at_night_on_the_foraging_behavior_of_an_endangered_nocturnal_mammal/download

Cell Tower Habitat Fragmentation

O9-42

9. Helgen, K. M. (1988). River otters as agents of water loss from beaver ponds. *Northwest Science*, 62(2), 65-70. https://www.researchgate.net/publication/272588969_River_Otters_as_Agents_of_Water_Loss_from_Beaver_Ponds/download

10. Devon Wildlife Trust. (2019). *Appendix 3: Beaver ecology and key factors informing future management*. Devon Wildlife Trust. https://www.devonwildlifetrust.org/sites/default/files/2019-07/Appendix%203.pdf

11. Semlitsch, R. D., & Bodie, J. R. (2003). Biological criteria for buffer zones around wetlands and riparian habitats for amphibians and reptiles. *Conservation Biology*,

17(5), 1219-1228. https://www.researchgate.net/publication/227519234_Biological_Criteria_for_Buffer_Zones_Around_Wetlands_and_Riparian_Habitats_for_Amphibians_and_Reptiles/download

12. National Council for Air and Stream Improvement (NCASI). (undated). *TB908: Riparian zone forest management*. NCASI. https://www.ncasi.org/wp-content/uploads/2019/02/tb908.pdf

O9-43 (Cont.)

Wildlife-Vehicle Collision Risks

13. Gehrt, S. D. (2004). Ecology of coyotes in urban landscapes. *Proceedings of the Vertebrate Pest Conference*, 21, 303-311. https://www.researchgate.net/publication/252881542_Ecology_of_coyotes_in_urban_landscapes/download

14. Federal Highway Administration (FHWA). (2008). *Wildlife-vehicle collision reduction study: Report to Congress*. U.S. Department of Transportation. https://www.fhwa.dot.gov/publications/research/safety/08034/08034.pdf

15. Borg, K., Jensen, M. B., & Seiler, A. (2020). Wildlife-vehicle collisions - Influencing factors, data collection and research methods. *Transportation Research Procedia*, 48, 2168-2185. https://www.researchgate.net/publication/344285425_Wildlife-vehicle_collisions_-_Influencing_factors_data_collection_and_research_methods/download

16. Sugden, S. M., Sanderson, D., Ford, K., Stein, L. Y., & St. Clair, C. C. (2024). Impacts of urban heterogeneity... on coyote survival. *Urban Ecosystems*, 27(5), 1357-1368. https://link.springer.com/content/pdf/10.1007/s11252-024-01643-w.pdf

O9-44

Letter I1

From: jsadams.4910@yahoo.com
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 3:19:47 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

To whom it may concern, I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. Thank you for your consideration, [name]

I1-1
I1-2
I1-3
I1-4
I1-5
I1-6
I1-7
I1-8
I1-9
I1-10
I1-11
I1-12
I1-13
I1-14
I1-15

Letter I2

From:	Avery, William E
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 7:58:21 PM

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This message came from outside your organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I2-1 I2-2 I2-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I2-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I2-5

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I2-6

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I2-7

Incomplete Environmental Baseline and Project Description –

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I2-8
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I2-9

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I2-9 (Cont.)

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I2-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I2-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I2-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I2-13

Thank you for your consideration,

William E Avery PhD
Professor Emeritus, Biological Sciences, CSUS

Sent from my iPhone

Letter I3

From:	Roger J. Baccigaluppi
To:	Rio Americano
Subject:	Rio American HS Football stadium lights
Date:	Tuesday, October 13, 2026 6:33:34 PM

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To Whom it May Concern:
This is going to be a short letter and I will not go over all the reasons why lights should not be installed at the RAHS football field. There are many, BUT first and foremast is degradation of the American River Parkway(ARP). The ARP is the crown jewel of the Sacramento Metropolitan Area and should not be degraded, or compromised, made any less special than-it is, no matter what the reason or reasons for something desirable to some portion of the population. There is no possible way lights can be installed at RAHS and not affect the ARP. I3-1

Sincerely,
Roger Baccigaluppi
660 Morris Way
Sacramento, CA 95864

Letter I4

From: Chris Balaam
To: Rio Americano
Subject: Rio Stadium, no
Date: Thursday, October 15, 2026 6:42:31 PM

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Rio Graduate 1980. 4 kids graduated from Rio. No stadium. I4-1

Letter I5

From:	Rachel Bauer
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 11:44:17 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. The American River Parkway is a critical resource for wildlife, providing habitat to both migratory and resident species that have few other options in the urban landscape. I5-1 I5-2

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I5-3

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I5-4

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I5-5

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I5-6

Incomplete Environmental Baseline and Project Description – I5-7

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I5-8

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I5-9

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I5-10

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I5-11

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I5-12

Thank you for your consideration,

Rachel Bauer

Letter I6

From: Twanet Bender
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 5:45:04 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I6-1 I6-2 I6-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I6-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I6-5

I have further outlined my concerns about the project and the DEIR below. I6-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I6-7
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I6-8
Incomplete Environmental Baseline and Project Description – I6-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I6-10 I6-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I6-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I6-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I6-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I6-15

Thank you for your consideration,

Twanet Bender
Neighbor, Rio alum parent
American River advocate

Sent from my iPhone

Letter I7

From: Sydney Brahm
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: STOP Damaging the American River Parkway
Date: Thursday, October 15, 2026 11:49:35 PM

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Report Suspicious

To whom it may concern, I7-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community, and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. Wildlife that has already been reduced to such a small section of land that would be further encroached on. I7-2

Further, this proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I7-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is *not suitable* for a high intensity sports and events stadium. I7-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I7-5

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I7-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I7-7

Incomplete Environmental Baseline and Project Description – I7-8

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I7-9

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I7-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I7-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I7-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I7-13

Thank you for your consideration,

Sydney

Sydney Brahm

This e-mail message is covered by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2521. This e-mail message, including any attachments hereto, contains confidential, privileged information intended solely for the addressee. Please do not read, copy or disseminate this e-mail, or accompanying attachments unless you are both the addressee and the intended recipient. If you have received this message in error, please notify the message sender, forward the message back to us and delete the message from your machine. Thank you.

Letter I8

From: bbburrows@me.com
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: Stadium Parkway
Date: Thursday, October 15, 2026 6:47:43 PM

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To whom it may concern,

As a concern citizen and an alumni of Rio Americano class of 1975, I am concerned about the project that is being considered. As a resident since 1960, the parkway has been a treasure. The proposed project will no doubt cause harm to our treasured Parkway. My concerns are as follows: I8-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I8-2 I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I8-3 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I8-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I8-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I8-6

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I8-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I8-8

Incomplete Environmental Baseline and Project Description –

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions. I8-9

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I8-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I8-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I8-12

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I8-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I8-14

Thank you for your consideration,

Bette B. Burrows

4441 Rand Lane

Sacramento, CA

Letter I9

From: PATRICK CARROLL
To: Rio Americano
Subject: Rio DEIR
Date: Saturday, September 26, 2026 5:00:49 PM

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Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I9-1

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I9-2

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I9-3

I have further outlined my concerns about the project and the DEIR below. I9-4

Where the DEIR falls short: I9-5

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I9-6

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I9-7

Incomplete Environmental Baseline and Project Description – I9-8

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I9-9

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I9-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I9-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I9-12

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I9-13

I9-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

I9-15

Thank you for your consideration,
Patrick Carroll, MD

Letter I10

From: Keith & Heidi Collins
To: boardmembers@sanjuan.edu; Rio Americano
Cc: richdesmond@saccounty.gov; cliff.kelly@sanjuan.edu; wtaylor@sanjuan.edu; raab.board@gmail.com
Subject: Rio Americano High School Stadium Improvements & Lighting – Neighbor Coalition Letter of Support
Date: Friday, October 16, 2026 5:21:13 PM
Attachments: Neighborhood Coalition Ltr.pdf

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Dear Members of the San Juan Unified School District Board,

I am writing to you today—on this October 16th deadline for final EIR comments—to submit the attached letter of support for the proposed Rio Americano High School stadium improvements and lighting. I10-1

My home on Regency Circle sits just 10 houses away from the stadium boundary at the Whitehall Way convergence. Attached to this email is a letter bearing 19 verified signatures from residents primarily along the Regency Circle and Whitehall Way corridor, along with nearby adjacent neighbors on Dovercourt Circle and Ashton Drive. While time constraints prevented me from gathering signatures from every supportive household, numerous other immediate neighbors—many displaying support signs in their yards—share this backing. I110-2

We wanted to ensure our neighborhood's support is officially recognized ahead of the upcoming November 17th vote, noting that October 27th marks the final in-person public comment opportunity. I10-3

I have carbon-copied (CC'd) County Supervisor Rich Desmond (District 3) regarding traffic and public safety considerations, as well as the Rio Americano athletic department and administration to keep them informed of our community's backing.

Thank you for your time, leadership, and consideration of our neighborhood's perspective as you move toward the November 17th vote.

Sincerely,

Heidi Collins
Resident, Regency Circle, Sacramento
Initiator & Neighbor Signatory Contact
(916) 802-2099

NEIGHBORHOOD COALITION FOR RIO AMERICANO HIGH SCHOOL

Immediate Residents & Neighbors in Supporting Stadium Improvements

Date: August 31, 2026

To: Board of Education & Superintendent, San Juan Unified School District
Re: Stadium Enhancements & Field Lighting Installation at Rio Americano High School

SUBJECT: Neighborhood Support for Rio Americano High School Stadium Improvements & Lighting

Dear President, Members of the Board of Education, and District Leadership,

We, the undersigned residents living in the immediate neighborhood directly adjacent to Rio Americano High School stadium, write to express our strong and enthusiastic support for the proposed improvements, specifically the installation of permanent field lighting and athletic facility upgrades.

I10-4

For decades, Rio Americano has served as the anchor of our neighborhood. Modernizing the athletic facility with field lighting is an essential step forward in doing better for our students—providing them with a safe, high-quality, and inspiring environment to compete, perform, and build positive memories during their formative high school years.

Furthermore, these improvements enrich our broader neighborhood culture. Friday night games under the lights offer a vital rallying point for local residents, fostering intergenerational connection and community pride in the heart of American River Drive. As the district navigates the formal California Environmental Quality Act (CEQA) environmental review and technical studies, we want to affirm that we, as the surrounding neighbors, welcome these modern improvements and are confident that updated lighting technology will seamlessly integrate into our neighborhood.

As the Board moves through the environmental process toward project approval, we strongly urge you to move forward with the stadium lighting installation. Investing in Rio Americano's facilities is an investment in our youth and the social fabric of our entire community.

Thank you for your leadership and dedication to San Juan Unified students and our neighborhood.

Respectfully submitted by local residents and homeowners:

	Printed Name	*Neighborhood Address*	*Signature*	*Date*
1	HEIDI COLLINS	643 REGENCY CIR, SAC	HCollins	08.31.2026
2	MARC Heinzer	637 Regency Circle SAC		9/8/2026
3	Katie Doug O'BRIEN	601 Whitehall Way SAC CA.		9/8/2026
4	Chris Cabrestix	641 Cricket Ct SAC CA		9/8/26

NEIGHBORHOOD COALITION FOR RIO AMERICANO HIGH SCHOOL

Immediate Residents & Neighbors in Supporting Stadium Improvements

Neighborhood Resident Signature Continuation Sheet — Page 2 of 2

By signing below, we, the undersigned immediate neighbors of Rio Americano High School, re-affirm our full support for the stadium lighting installation and athletic facility improvements as detailed in the attached letter to the San Juan Unified School District Board of Education.

5 Jane Ulam 621 Cricket Ct Sac 9/8/2024
6 Corey Schildegger 713 Regency Circle Sac 95864 9/8/2024
7 Michael Rossman 713 Regency Cir, Sac 95864 9/8/
8 Sarah Harsh 4660 Chancery Way Sac 95864 9/8/
9 Jeff Keenan 640 Regency cir Sac 95864
10 [illegible] 640 Regency Cir Sac 95864
11 Ciara Nolan 4621 Ashton Drive SAC 95864
12 Debra Siegel 649 Regency Cir Sac 95864
13 Moranda Dahl 4743 Dovercourt Cir. Sacm. 95608 10.15.
14 Mark Hannenian 625 Regency Cir Sac 95864
15 Alexa Vramen 713 Whitehall Way sac 95864 10/1
16 Mike McLeroth 701 Regency Cir SAC 95864 10/15/2
17 [illegible] " " 10/15/
18 Brittney Adkins-Neumann 725 Regency cir, Sacramento 95864 10/15/
19 Jennifer Zehnder 701 Whitehall Way SAC 95864 10/15/2
20
21
22
23
24

cc: Rich Desmond, Sacramento County Board of Supervisors (District 3)
Board of Education Trustees, San Juan Unified School District
Rio Americano High School Administration & Athletic Department

Letter I11

From: Betty Cooper
To: Rio Americano
Subject: Rio Stadium enlargement
Date: Monday, September 14, 2026 2:45:33 PM

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To whom it may concern,
I oppose the alterations to the stadium due to:
-The light and noise extending into the evening hours affecting migratory birds along the American River, which is protected by the Wild and Scenic Rivers act which is federal law. Additionally, Migratory Birds are also protected under federal law. I11-1
-The school does not have adequate parking facilities to accommodate the crowd sizes expected for an enlarged stadium, impacting local residents into the night. I11-2
Sincerely,
Betty Cooper
4833 Sherlock Way
Carmichael, CA 95608

Letter I12

From: Katherine Coulter
To: mbassanelli@sanjuan.edu; Rio Americano; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: Rio Americano Stadium Project
Date: Thursday, October 15, 2026 2:08:22 PM

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To whom it may concern:

Subject: Comments on SJUSD's DEIR for the Rio Americano Stadium Project

I am writing to express concern about the proposed stadium at Rio Americano High School. The project would greatly increase bleacher capacity and bring more noise, nighttime lighting, traffic, and activity to the area. I am also concerned about evacuation planning and security for students, staff, families, and attendees. I12-1 I12-2

I understand the District's goal of providing stadium facilities at its high schools, but I do not believe the proposed site is suitable for a high intensity sports and events venue. It is next to the state protected American River Parkway, a sensitive river and habitat corridor. I value the Parkway as a natural area, wildlife corridor, recreational resource, and important part of our community, and I am concerned that nighttime lighting, amplified sound, crowds, and traffic could disturb wildlife and affect the Parkway beyond the school property. I12-3 I12-4 I12-5

The District recently added a track field at the proposed stadium location. The campus could instead offer an opportunity to develop a state of the art science program that uses the Parkway as an exceptional educational resource. I12-6

I ask the District to address the following shortcomings in the DEIR and, as needed, the FEIR: I12-7

- **Event noise:** The DEIR identifies noise impacts as significant and unavoidable even after mitigation. The District should evaluate another alternative and explain how the proposed project would comply with the Sacramento County Noise Ordinance.
- **Lighting:** The analysis should meaningfully evaluate glare, skyglow, light spectrum, and nighttime activities near the Parkway and river corridor. The FEIR should require lighting designed to achieve the greatest feasible reduction in impacts, consistent with DarkSky principles. I12-8
- **Project description and environmental baseline:** The DEIR/FEIR should specify maximum, accurate stadium operating conditions rather than generalized "typical" conditions. It should establish reasonable, enforceable standards for nighttime events, facility use, staffing, security, parking, and public address systems, consistent with nearby residential use, the Parkway Corridor Combining Zone, and the 2008 American River Parkway Plan. The baseline should not include portable diesel lights that the District only recently began using. I12-9
- **Biological resources:** The DEIR/FEIR should analyze how ongoing stadium operations I12-10

and events could affect wildlife, habitat, and recreational use along the Parkway. I12-10 (Cont)

- **Cumulative impacts:** The analysis should consider the 90 foot cell tower together with stadium construction and operations. I12-11

- **Parking and traffic:** The DEIR/FEIR should provide a parking and transportation analysis for the anticipated 3,500 or more people using the stadium and event center. Suggested offsite parking without adequate security is insufficient. I12-12

I respectfully ask the District to fully evaluate the project's effects on the Parkway, adopt all feasible measures to reduce those effects, and consider less intensive alternatives that meet its educational and athletic objectives while better protecting this important resource. I12-13

Thank you for your consideration.

Respectfully,

Kaherine Coulter

Letter I13

From: Catherine Dee
To: Rio Americano
Subject: Opposed to this expansion
Date: Sunday, September 27, 2026 3:07:05 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I13-1 I13-2 I13-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I13-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I13-5

I have further outlined my concerns about the project and the DEIR below. I13-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I13-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I13-8

Incomplete Environmental Baseline and Project Description – I13-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I13-10

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I13-10 (Cont)

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I13-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I13-12

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I13-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I13-14

Thank you for your consideration, I13-15

Catherine Dee

Letter I14

September 13, 2026

San Juan Unified School District
3738 Walnut Ave.
Carmichael, CA 95608

To whom it may concern - DEIR Team,

Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project

This letter is sent as our public comment submission for the Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I14-1

We would like to express our concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. We are concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I14-2 I145-3 I14-4

Although we understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I14-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I14-6

We have further outlined our concerns about the project and the DEIR below. I14-7

Where the DEIR falls short:

- Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I14-7
- *Lighting* – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I14-8
- Incomplete Environmental Baseline and Project Description –
- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I14-9
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I14-10
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I14-11
- Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I14-12
- Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I14-13

- Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I14-14

Thank you for your consideration,

Severiano ("Del") & Connie Del Real

Del and Connie Del Real

cc: Melissa Bassanelli, Superintendent
3738 Walnut Ave.
Carmichael, CA 95608

Nicholas Arps, Director, Facilities Construction
3738 Walnut Ave.
Carmichael, CA 95608

Letter I15

From:	Sara E Denzler
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public Comments on Rio Americano Stadium Project DEIR (S.Denzler)
Date:	Wednesday, October 14, 2026 8:01:22 PM
Attachments:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project.docx

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Attached please find my comments regarding the Draft EIR for the Rio Americano Stadium Project. Please include this in the public record. I15-1

Thank you,
Sara E. Denzler

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.

I15-1 (Cont.)

To whom it may concern,

I am a longtime resident of Sacramento and I live directly across the American River from Rio Americano High School. I love living in my modest neighborhood near the American River Parkway (Parkway). I spend time by the river daily and see the rich diversity of bird and animal species that rely on the Parkway's riverine and riparian habitat.

I15-2

California has lost 95% of it's historic riparian habitat, so the Parkway is an important resource for the species that rely on that habitat. The Parkway includes the only federally and state-designated Wild & Scenic River that flows through a major metropolitan area in the United States. It is a national, state and local treasure and a vital artery for our community's health, recreation and natural beauty - a truly special place that people have worked together for decades to establish, protect and preserve for future generations.

I15-3

I am concerned about the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of life for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway.

I15-4

I15-5

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano High School is not suitable for a high intensity sports and events stadium. The campus would be an excellent location for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I15-6

Below are listed my specific concerns about the project and the DEIR.

I15-7

Biological resources – Biological resources such as bats, nesting birds, northwestern pond turtles, and elderberry longhorn beetles are addressed largely through construction-phase measures, with cursory analysis on impacts from the unspecified numbers of nighttime sports and events on the diversity of and heavy use by wildlife in this area of the River and Parkway.

Event Noise – Noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

I15-8

I15-9

Lighting – The DEIR/FEIR should meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.

I15-10

Incomplete Environmental Baseline and Project Description –

- An accurate project description is essential because it defines the impacts that must be analyzed and the mitigation measures that could eliminate or reduce them. The DEIR should identify the Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and public-address specifications as project components that will, conceivably, constrain sports and events, both regular and those that are larger and later. The District's project must comply with the Urban American River Parkway Preservation Act. I15-11 I15-12
- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I15-13
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I15-14

Cumulative impacts – The separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I15-15

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I15-16

Thank you for your consideration,

Sara E. Denzler

9231 Defiance Circle, Sacramento, CA 95827

Letter I16

From: Gail Derin
To: Rio Americano
Subject: Stadium construction at Rio Americano HS
Date: Thursday, October 15, 2026 9:55:45 PM

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Adding my name to consider the negative impact to the environment and surrounding areas in proceeding with this project. It would be very disruptive to the wildlife at the protected American River Parkway. Between cell towers, LED lights, noise pollution. Preserve the brick reserve that we have.
My vote is not to proceed at this location.
Thank you for your consideration
Gail Derin
Sacramento
Sent from my iPhone

I16-1

Letter I17

From:	barbara dugal
To:	construction@sanjuan.edu; frank.camarda@sanjuan.edu; Rio Americano; raj.rai@sanjuan.edu; mbassanelli@sanjuan.edu
Subject:	DEIR - Website Appendices Issue
Date:	Wednesday, September 2, 2026 11:50:48 PM
Importance:	High

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I am in receipt of the District's email alerting the public that the Draft Environmental Impact Report (DEIR) for the Rio stadium project has been released and is available on the District's website and through the State Clearinghouse.

However, the nomenclature used for the DEIR appendices does not appear to match the appendix titles and/or labels listed on the District's website. This inconsistency makes it difficult for members of the public to determine whether they have located the complete and correct supporting documents.

In addition, the "appendices" link within the DEIR directs users back to the District's general project webpage rather than to the individual appendices themselves. This requires the public to search through the webpage and creates unnecessary barriers to reviewing materials that are part of the environmental record. I have already heard from several individuals that they have been unable to find the appendices on the District's website..

I17-1

Please promptly:
Correct or clarify the appendix nomenclature so that the DEIR, District webpage, and State Clearinghouse materials use consistent titles, labels, and numbering.

Provide direct, working links to each individual DEIR appendix from the DEIR document and the project webpage.

Confirm that all appendices and technical studies referenced in the DEIR are publicly available in their complete form.

Issue an updated public notice or webpage correction once the links and labels have been corrected.

Because the public-review period is time-sensitive, accessible and accurately labeled DEIR materials are essential to meaningful public participation. Please confirm when these corrections have been made

Thank you, Barbara Dugal

Letter I18

From:	barbara dugal
To:	Nicholas Arps: Rio Americano
Cc:	Melissa Bassanelli; boardmembers@saniuan.edu
Subject:	Public Comments on Rio Stadium DEIR SCH No. SCH No. 2026010094
Date:	Friday, October 16, 2026 10:49:14 PM
Attachments:	SCH 2026010094 B Dugal 10-16-26 Comment Ltr. pdf.pdf

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Report Suspicious

Sent Via Email Only - Please Confirm Receipt of My Attached Comments

Good evening Mr. Arps and Aecom Representatives:

Attached are my public comments on the SJUSD's DEIR for the Rio Americano stadium project. Please include these comments into the administrative record. I18-1

Sincerely,
Barbara Dugal
4616 Ashton Drive
Sacramento CA 95864

October 16, 2026

Sent Via Email Only - Please Confirm Receipt
Nicholas Arps
Director of Facilities Construct and Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

nicholas.arps@saniuan.edu

E-mail: RioEIRComments@aecom.com

Dear Mr. Arps;

Subject: Comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Project (SCH No. 202610094)

I am submitting the following comments and attachments on the Draft Environmental Impact Report (DEIR) for the Rio Americano Stadium project.

Notice of Preparation and Initial Study - Comments Ignored

On February 5, 2025, I submitted comments during the Initial Study/Scoping phase of this project. Unfortunately, not all of my concerns and comments have been addressed in the DEIR. This includes the following:

1) A documented process for resolving operational issues including real time points of contact during events. This should include responsibility for compliance enforcement between the District and Rio Americano High School. I18-2

2) The project description CEQA requires a DEIR to accurately describe the location/setting of the project site to correctly inform the lead agency, regulatory authorities, and the public of potential impacts from the proposed project. I18-3

The Executive Summary, page 1-1, and Section 3, Project Description, states in part that "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 my February 5th NOP/Initial study, I commented that the project location described in the NOP, section 2.1, was incomplete and inaccurate. These changes were not made. The correct APNS are 292-0210-019-000 and 292-0210-021-000, this needs to be corrected throughout the DEIR.

My February 5th comment letter included a correction that was not made and continues into the DEIR. It was stated in the NOP/Initial Study that the "improvements and use would be at the existing "Raider Stadium". The DEIR must accurately describe I18-4

the existing site conditions. A field and stadium are both associated with sports use, but they differ substantially in scale, intensity, infrastructure and environmental impacts. Continuing to characterize the field as a "stadium" minimizes the true scope and intensity of the proposed development and obscures potential environmental impacts related to lighting, noise, traffic, parking, air quality and neighborhood compatibility. This needs to be corrected and analyzed throughout the DEIR. I18-4

Although the District identifies this document as a DEIR, its scope and analysis appear functionally limited to the proposed improvements within Rio Americano's campus. The Notice of Preparation describes improvements to the existing stadium and associated paved pedestrian access routes, while acknowledging that the Parkway is immediately adjacent to the project site and that residential neighborhoods surround the campus. I18-5

The environmental effects of this project are not confined to the school property. The proposed increase in capacity, permanent high-mast lighting, amplified sound, and expanded sports and event use has the potential to affect the Parkway, the river corridor, surrounding wildlife and habitat, Parkway users, and nearby residential neighborhoods. I18-6

The DEIR must therefore demonstrate that its analyses extend beyond the project's physical boundaries to the locations where environmental effects may occur. This includes evaluating nighttime lighting and glare along the Parkway and river corridor; operational noise affecting wildlife, Parkway visitors, and nearby residents; event-related traffic, parking, and pedestrian safety on surrounding streets; and cumulative impacts associated with other existing and reasonably foreseeable activities and projects in the area.

A project boundary is not an appropriate limit on the geographic scope of environmental impact analysis. The relevant question is where the project's direct, indirect, and cumulative effects may occur.

I am requesting that the Final EIR identify the geographic scope and methodology used for each environmental analysis, provide the supporting data for conclusions regarding off-site impacts, and correct any deficiencies in the evaluation of effects on the Parkway and surrounding communities. Where the DEIR has not adequately evaluated these effects, the District must provide the additional analysis necessary for informed public review and decision-making.

3) Wildfire Risk and Emergency Access Should be Fully Analyzed

In my February 5th letter, I shared that community members are concerned about wildfire risks and emergency access The DEIR fails to address: how emergency vehicles would access the site during peak attendance; whether large crowds could interfere with evacuation or emergency response, and how increased use affects fire risk near vegetated river and Parkway areas. This is vital and needs to be analyzed fully in the EIR. The American River Parkway Fire Safe Council [1] has developed a I18-7

[1] https://arpf.org/what-we-do/programs/firesafecouncil/

Community Wildfire Protection Plan to address fire hazards along the Parkway, particularly due to increasing wildfire threats in the region. This plan aims to mitigate fire danger and protect both the natural habitat and surrounding infrastructure, including areas adjacent to Rio Americano High School. Wildfire risk and emergency access/response needs to be fully analyzed and a specific emergency response plan needs to be prepared and circulated with the EIR.

I18-7 (Cont.)

4) My February 5th letter also raised Transportation and Parking Impacts. The DEIR, in section 3.2.2 OPERATIONS PLAN states in part that…''The District would employ Night Event Management Standards that would be used in conjunction with the highschool's existing standard operations, policies, and procedures…." This "Event Management Standard" should have been included in the DEIR. It needs to be prepared and this section of the DEIR needs to be recirculated so that members of the public can comment on it. Parking, traffic, and other related impacts already affect the area. In fact, this topic will be discussed at the annual Wilhaggin Neighborhood Association's annual meeting. Panelists include the Supervisor Rich Desmond's office, the Sheriff's Department, Sacramento County Transportation and Frank Camarda. This is evidence of the problems that already exist and documents that the District's project will significantly impact an already impacted community. Therefore, the District should postpone taking any action, until at a minimum, after the December community meeting.

I18-8

I also note that no analysis was conducted on Wixford Way which is a narrow street,

I18-9



especially when vehicles are parked on both sides of the street. This creates an emergency response impact. This needs to be analyzed and addressed in the EIR. See photo above of Wixford Way.

5) Scoping Meeting Comment to J. Matthew Gerken Principal-in-Charge with Aecom. At the January 2026 scoping meeting, I spoke with Mr. Gerken regarding the need for

I18-10

robust noise[2] studies. At a minimum, using the same standards used for the Jesuit noise study. And that the studies should also include areas across and downstream from Rio's campus. The noise studies were limited to the Rio's campus and noise readings taken at El Camino HS in 2025 and did not include residential areas around Rio or communities on the south side of the River. New noise studies need to be conducted and the DEIR recirculated.

I18-10 (Cont.)

DEIR Comments

The American River Parkway is not separated by the levee, the levee is a part of the American River Parkway. Incorrect Characterization of the American River Parkway and Levee in the Lighting Analysis. The DEIR incorrectly characterizes the American River Parkway as being separated from the Rio Americano High School campus by the levee and relies on this assumption in its lighting analysis. The DEIR states:

> "Based on land use, ecological sensitivity, and existing nighttime brightness, for the purpose of this EIR, the segment of the American River Parkway that is south of and separated by the levee (my emphasis) from the Rio Americano High School campus is considered to be Lighting Zone LZ-0, based on the Joint IDA-IES classifications." (DEIR, p. 4.1-11.)

I18-11

This characterization is incorrect. The levee is part of the American River Parkway; it does not separate the Parkway from the campus in the manner described by the DEIR. The levee itself is part of the Parkway landscape and must be considered in evaluating the project's potential lighting impacts, and any other impacts, on the Parkway and its resources.

By treating the levee as a boundary separating the Parkway from the school campus, the DEIR improperly characterizes the relationship between the proposed stadium and the Parkway's ecological resources and nighttime environment. This assumption raises concerns about whether the lighting analysis adequately evaluates light spill, glare, skyglow, and potential effects on wildlife and other sensitive resources associated with the Parkway.

The District must correct the DEIR's characterization of the levee and the Parkway, provide supporting documentation for the applicable lighting-zone designation, and reassess the lighting analysis, or any other analysis, wherever it relies on the assumption that the levee separates the Parkway from the school campus. The revised analysis must evaluate potential lighting impacts on the levee itself and throughout the affected Parkway environment, using accurate site conditions and appropriate consideration of the Parkway's ecological sensitivity and nighttime conditions. Any resulting impacts must be adequately disclosed and addressed through enforceable mitigation measures, as appropriate.

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[2] https://coeh.ucdavis.edu/research/how-noise-pollution-quietly-affects-your-health

Exhibit 4.4-1 - Project Location and Study Area - This Exhibit is incorrect. It depicts the projection location in the Parkway. Any analysis that relied on this exhibit needs to be reanalyzed for accuracy. The exhibit needs to be corrected and recirculated. I18-12

Page 4.3-8. States that the football game at El Camino was played on August 29, 2026. This is incorrect, the game was played on August 28, 2026. This needs to be corrected and any analysis needs to be reviewed, corrected and adjusted. I18-13

Photo Viewpoint KOP-7 Page 4.1.-8 This photo is very misleading. Photos taken from different viewpoints need to be included in the EIR that show existing field improvements are visible from the Parkway. I18-14

Graduation Ceremonies - Throughout the DEIR it is discussed that graduation ceremonies would move from Memorial Auditorium and would be held at Rio Americano. I understand that the Memorial Auditorium seats 3,867. Speaking with parents who attended the 2026 Rio graduation ceremony, there were at least 4,000 people in attendance, standing room only. Since the proposed stadium would seat 2,575, what does the District intend to do? Have folks stand for hours, what about temperatures, bad weather. What is the cost to rent or set up additional seating? This needs to be analyzed. Sacramento's historical June temperatures show that June is typically hot, with an average high near 88°F, but temperatures can exceed 110°F. This needs to be analyzed. Additionally, a limit on attendees for these types of "events" needs to be analyzed and established. I18-15

I understand that a public school stadium/field requires a posted occupant load (people seated, standing, players on field, coaches, employees, volunteers, etc - all are part of count). There are no maximum occupant loads posted at the current athletic field and the EIR does not explain current or future maximum occupant load - they only estimate possible crowd size for sporting event and school sponsored events. I18-16

Also, non-school rented events are not defined in the EIR, nor estimated. But the stadium will be available for rental and use. Also when they have multiple events on different fields - not sure how this factors and is controlled. If maximum occupant load is exceeded - Sacramento Metro Fire Department is the enforcing entity. Yet no where in the DEIR have I located any reference to the Sacramento Metro Fire Department and their review or comment on the DEIR. This needs to be reviewed and updated information needs to be provided. Public safety is a huge concern. I18-17

Plans, Drawings - Division of State Architect (DSA) - At the District's August 27, 2026, rendering meeting, I requested drawings or a site plan depicting the proposed improvements. I was told that the plans were not yet complete. I now understand that the District has initiated the design review process with the Division of the State Architect (DSA) under Application No. 124535, File No. 34-H8. I18-18

I recently submitted a Public Records Act (PRA) request to the DSA seeking all materials related to the District's project. According to the DSA project tracker, the District has submitted a DSA-1 application and associated materials, with structural review listed as having a start date of November 20, 2026. The DSA process also identifies a DSA-3 form and pre-submittal checklist involving construction documents and other required materials. Until I receive the records requested from the DSA, I cannot determine when the District applied, what plans and supporting documents were submitted, or the extent to which the proposed improvements had been designed when the DEIR was prepared.

I18-18
(Cont.)

This raises a fundamental question: Why was the DEIR released for public review without providing even a site plan or project drawings depicting the intended improvements? The public needs sufficient information to understand precisely what the District proposes to build, where each improvement will be located, its dimensions and height, and how the various project components relate to one another and to the surrounding environment. This information is particularly important for evaluating potential impacts associated with stadium lighting, noise, visual resources, trees and other vegetation, wildlife, traffic, and the American River Parkway.

Without a site plan and sufficiently detailed project drawings, members of the public cannot meaningfully evaluate the project's physical characteristics, determine whether the DEIR has adequately analyzed the full scope of the proposed improvements, or assess whether the identified mitigation measures will effectively address the anticipated impacts.

CEQA requires an accurate, stable, and finite project description that provides an adequate basis for evaluating environmental impacts and informed public review. The absence of plans and drawings raises concerns about whether the DEIR describes the proposed project with sufficient specificity to support that review.

The District's design process need not necessarily be complete before a DEIR is circulated. However, the environmental document must describe the proposed project in sufficient detail to permit meaningful analysis of its reasonably foreseeable environmental consequences. The District should not defer essential information about the project's location, dimensions, configuration, or other environmentally consequential characteristics until after the public comment period.

Therefore, the District should provide the site plan, project drawings, and other available design documents necessary to clearly depict all proposed improvements. The District should identify which design documents were available when the DEIR was prepared and explain how the project description and environmental analyses account for the proposed improvements. If the DEIR does not provide sufficient information to evaluate the project and its environmental impacts, the District should revise the

project description and affected analyses and recirculate the DEIR for public review and comment as required by CEQA.

I18-18 (Cont.)

Existing Tree Canopy and Visual Simulations - The DEIR should provide additional information regarding the existing mature trees along the southern Rio property fenceline and their role in the visual analysis of the proposed 80-foot high-mast light standards and bleachers, etc.

I18-19

The District's Bat Survey Memo identifies a row of large trees immediately adjacent to the south side of Raider Stadium. The District's project website also provides visual simulations from the Jedediah Smith Memorial Trail and East Property fenceline, including a “Jedediah Smith Trail Location - No Trees (Night)” rendering and several “Realistic” and “Dusk” views.

However, the DEIR materials reviewed do not appear to provide a tree survey, arborist report, tree-height inventory, canopy-height measurements, or other quantitative documentation establishing the height, canopy dimensions, locations, or elevations of the existing trees along the stadium's Parkway-facing edge. This information is necessary to establish an accurate visual baseline and to determine the extent to which the proposed 80-foot light standards, all other project components, and the 90’ cell tower would extend above the existing tree canopy and be visible from the American River Parkway and Jedediah Smith Memorial Trail.

The District should identify the source photographs and methodology used for each visual simulation, including the viewpoint location, camera elevation, date, and assumptions regarding existing vegetation. The District should also provide the tree heights and canopy dimensions relied upon in preparing the realistic simulations and explain whether the simulations accurately depict existing vegetation at the time of the environmental analysis.

I18-20

If measured vegetation data were not used, the District should explain the basis for the vegetation portrayed in the simulations and provide revised simulations using accurately documented existing conditions. The analysis should evaluate the visibility of the full height of each proposed 80-foot light standards, all other field improvements, and 90’ tall cell tower, including the portion extending above the existing tree canopy, from representative locations along the Jedediah Smith Memorial Trail and Parkway.

I18-21

Ticket Counts and Event Attendance - The DEIR’s estimates of event attendance and ticket counts require further explanation and supporting documentation. The District should identify the source data, assumptions, and methodology used to calculate projected attendance at the proposed Rio Americano stadium.
The proposed stadium would increase seating capacity from approximately 288 seats to 2,575 seats. This represents a substantial increase of 875% in the number of

I18-22

spectators the facility could accommodate. However, seating capacity alone does not establish how many people will attend individual events, how frequently the stadium will be used, or the number of vehicles and trips that will result.

I18-22 (Cont.)

The DEIR should clarify whether its ticket counts represent tickets available, tickets distributed, tickets sold, anticipated attendance, or actual attendance at comparable events. These measures are not equivalent. If the District relies on historical ticket counts or attendance at existing Rio Americano events, it should provide the underlying records and explain why those figures reliably predict future attendance at a significantly expanded facility.

I18-23

The DEIR should also explain whether its estimates account for the full range of proposed uses, including athletic competitions, graduations, assemblies, and other non-athletic events. Different event types may have different attendance patterns, spectator origins, vehicle occupancy rates, and parking demands. An estimate based on one type of event should not automatically be applied to other events without supporting evidence.

I18-24

Lack of Facilities Use Permits/Control of Existing Uses - Inadequate Analysis of Existing Facilities-Use Practices and Enforcement - The District's facilities-use permit process is an important mechanism for regulating the use of school facilities by outside organizations and other users. The process should establish the authorized purpose, dates, times, conditions, and responsibilities associated with facility use and provide a means of ensuring that users comply with applicable requirements.
The DEIR should explain how the District's existing facilities-use permit process operates at Rio Americano, including how permits are issued, how compliance with permit conditions is monitored, and how violations are documented and addressed. Of particular concern is that the District does not consistently follow and enforce its facilities-use permit requirements for activities at Rio Americano. If existing activities have occurred without the required authorization, outside the scope of an approved permit, or in violation of permit conditions, those circumstances are relevant to understanding the existing environmental setting and evaluating the effectiveness of the District's proposed operational controls.

I18-25

I have personally documented many instances **(example - photos below)** and obtained PRA's which verifies that required permits were not obtained, activities exceeded the scope of an approved permit, or permit conditions were not followed or enforced. I have documented and reported many examples, including, but not limited to men playing soccer on most weekends, private landscape companies conducting field improvement activities on the "soccer" field adjacent to American River Drive. I have also witnessed men urinating against the baseball backstop. These types of unregulated activities impact the neighborhood and Parkway.

I18-26





I18-26
(Cont.)

I18-27

The DEIR should disclose, for public review, and explain and include as a mitigation measure, the following:

The facilities-use policies, procedures, and permit conditions applicable to Rio Americano High School and the proposed stadium.

The procedures used to approve, document, monitor, and enforce permits for athletic and non-athletic events, including events conducted by outside organizations.

The procedures for recording complaints, investigating alleged violations, requiring corrective action, and imposing consequences for noncompliance.
The specific operational restrictions that will apply to the proposed stadium and overall campus and the means by which compliance will be independently verified or documented.

I18-27 (Cont.)

The District should also identify enforceable operational requirements for the proposed stadium, including clear limits on event scheduling, operating hours, lighting, amplified sound, attendance, and other activities that may affect the surrounding neighborhood and Parkway. Those requirements should identify the responsible monitoring authority, compliance documentation, complaint-response procedures, and corrective measures for violations.

The District should supplement the DEIR with the applicable facilities-use policies, relevant permit records, and documentation necessary to evaluate how existing facility use is authorized and monitored at Rio Americano. The District should respond to documented instances of noncompliance and explain how its proposed operational procedures will address the potential for recurring violations.

I18-28

Lighting - Ball Tracker - Inadequate Analysis of the Proposed Ball Trackers

The proposed stadium lighting system includes ball-tracking lights intended to illuminate the flight of a football. According to the project information, two ball trackers would be installed on each of the four stadium light poles, positioned approximately 16 feet above ground level. These fixtures would direct light upward to track the football during football activities.

The use of ball trackers raise concerns that are not adequately addressed by the DEIR's lighting analysis. The DEIR should evaluate the ball trackers as a distinct lighting source, rather than assume that the analysis of the primary stadium lights also accounts for their effects. The use of a Ball Tracker system because they are designed to direct light upward, rather than confine illumination to the playing surface. The ball trackers potential to introduce additional light into the night sky and surrounding environment warrants removal from project consideration due to the Parkway's ecological resources and needs.

I18-29

Cumulative Impacts - Ralph Richardson Center and the Rio Americano High School Stadium Project

The DEIR must clarify why the Ralph Richardson Center and its activities were considered in the cumulative-impact analysis for the proposed Rio Americano project.

CEQA requires an adequate evaluation of the proposed project's incremental contribution to cumulative environmental impacts when considered together with past, present, and reasonably foreseeable future projects. The analysis must consider the

I18-30

combined effects of relevant projects rather than evaluating the Rio stadium project in isolation. Other projects to include in the Cumulative Impact analysis are the following relevant directly related projects. The DEIR's cumulative-impact analysis must adequately consider the combined effects of the Rio Americano Project with other past, present, and reasonably foreseeable future activities affecting the Parkway and surrounding neighborhoods. This includes the U.S. Army Corps of Engineers' Contract 3B and the anticipated effects of Jesuit High School's decision to enroll girls, beginning in 2027, which will affect traffic, parking, and stadium use. The District must explain whether and how these activities were considered, provide supporting evidence, and evaluate their combined effects on traffic, noise, lighting, wildlife, and Parkway users. Without a complete and evidence-supported cumulative analysis, the public cannot adequately assess the project's incremental contribution to potentially significant cumulative impacts.

I18-30 (Cont.)

Distance to El Camino High School - Is approximately 2.24 miles, this and all analysis related to this needs to be corrected.

I18-31

Alternatives Analysis - Environmentally superior alternatives were not adequately evaluated or considered in the DEIR. Viable, cost-effective, and feasible alternatives exist that could avoid or substantially reduce the project's most significant environmental impacts.

I18-32

Regarding Alternative 2, District staff reportedly stated that moving the improvements north toward American River Drive, as recommended by Liz Bellas, Sacramento County Parks Director, was not feasible due to cost. However, an alternative should not be included if the District already decided that Alternative 2 was not financially viable. Additionally, an alternative cannot be dismissed solely because the project proponent considers it too costly. CEQA requires a good-faith evaluation of potentially feasible alternatives, supported by substantial evidence, including consideration of whether an alternative would meet most of the project's basic objectives while reducing significant environmental impacts.

The DEIR should meaningfully evaluate a reduced-capacity stadium, enforceable limitations on nighttime events and lighting, alternative locations or use of existing facilities, and a nature and outdoor science education alternative serving students throughout SJUSD while protecting the American River Parkway and its wildlife.

The District must provide a meaningful comparison of alternatives, substantiate its reasons for rejecting potentially feasible options, and identify the environmentally superior alternative as required by CEQA. Cost concerns alone should not substitute for the analysis necessary to inform the public and decision-makers of feasible options that could reduce the project's environmental impacts.

Environmentally superior alternatives were not adequately evaluated or considered in the DEIR. Viable, cost effective and feasible alternatives exist that would help to avoid the most significant environmental impacts. However, I understand that regarding Alternative 2, District staff has stated that the improvements could not be moved to the north towards American River Drive, as recommended by Liz Bellas, Sacramento County Parks Direction, due to costs. CEQA does not allow alternatives analyses that are not considered viable by the project proponent.

I18-32 (Cont.)

The DEIR's alternatives analysis is therefore inadequate as it failed to meaningfully evaluate feasible alternatives that could meet the District's stated objectives while reducing environmental impacts. The District should fully evaluate a reduced-capacity stadium, limitations on nighttime events and lighting, and alternative locations or existing facilities that could accommodate athletic and non-athletic activities. It should also consider a nature and outdoor science education alternative that benefits students throughout SJUSD while protecting the Parkway and wildlife. The District must provide a meaningful comparison of alternatives, explain why potentially feasible alternatives were rejected, and identify an environmentally superior alternative consistent with CEQA.

Mitigation Measures

The DEIR's proposed mitigation measures are inadequate unless they are specific, enforceable, and sufficient to reduce significant environmental impacts to less-than-significant levels. The District must ensure that all mitigation measures are incorporated into the final EIR and project approvals, with clear performance standards, monitoring requirements, and accountability for compliance. Where impacts cannot be adequately mitigated, the District must reconsider project design and feasible alternatives to avoid or further reduce harm to the surrounding neighborhood and the American River Parkway. Please add the following mitigation measure that will eliminate all future use of portable lights on Rio Americano's campus.

I18-33

Thank you for your consideration and for your attention to the request for notice. Please confirm receipt at your convenience.

Sincerely,

Barbara Dugal

cc: Superintendent Bassanelli - mbassanelli@sanjuan.edu
All SJUSD Board Members - boardmembers@sanjuan.edu

Letter I19

From:	Shawn
To:	Rio Americano
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Saturday, September 26, 2026 6:00:35 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, and the Parkway Plan. • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. Thank you for your consideration,

I19-1
I19-2
I19-3
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I19-5
I19-6
I19-7
I19-8
I19-9
I19-10
I19-11
I19-12
I19-13
I19-14

Ms. Shawn Duncan
Sacramento Resident

Letter I20

From: Teeann Duncan
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 8:14:00 PM

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Report Suspicious

To whom it may concern,

I have concerns regarding the intended stadium construction at Rio Americano High School. The almost 800% increase in bleacher capacity, is a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I20-1 I20-2 I20-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I20-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I20-5

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I20-6
Incomplete Environmental Baseline and Project Description –

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I20-7
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I20-8
• The existing baseline conditions should not include portable diesel lights that the I20-9

District has only recently started using. I20-9 (Cont.)

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I20-10

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I20-11

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I20-12

Thank you for your consideration,

Teeann Duncan - Rio alum

Letter I21

From: Kimberly Erickson
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: DEIR Comment Letter - Parkway Language Submit Comments by Oct 16th
Date: Friday, October 16, 2026 5:47:13 PM

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To whom it may concern,

Subject: SJUSD's DEIR - Rio Americano Stadium Project

I21-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School. This project proposes an almost 800% increase in bleacher capacity, which will lead to a substantial increase in noise and light pollution, traffic congestion, and potential safety issues. I am deeply concerned about the impact on the quality of life for the surrounding community and the effects on the wildlife that depend on a dark and quiet American River Parkway. Furthermore, the proposal's lack of a comprehensive evacuation plan and any form of security of any type places students, parents, staff, and event attendees at a serious safety risk.

I21-2

I21-3

While I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, located along the state-protected American River Parkway, is unsuitable for a high-intensity sports and events stadium. It is worth noting that the District added a track and field at this location within the last ten years. This campus presents an excellent opportunity for a state-of-the-art science program, using the Parkway as a unique educational resource.

I21-4

I21-5

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short:

I21-6

- **Event Noise:** Noise pollution has been identified as a significant and unavoidable impact, even with mitigation measures. Therefore, another alternative should be presented. Please clarify how this project will comply with the Sacramento County Noise Ordinance.

- **Lighting:** The DEIR must meaningfully evaluate the glare, skyglow, spectrum, and impacts of nighttime activities on the areas adjacent to the Parkway and river corridor. The community has already raised concerns about the severe light pollution and glare from the proposed 80- to 100-foot permanent light poles, which

I21-7

would shine directly into nearby homes. The FEIR must mandate lighting that complies with the maximum light reduction available through DarkSky-oriented design to protect the dark nighttime environment.

I21-7 (Cont.)

- **Incomplete Environmental Baseline and Project Description:**

  – The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use, rather than relying on generalized "typical" operating conditions. These conditions must be reasonable and not disrupt the inherent right of private, quiet, enjoyment of properties we, who are impacted, possess. This is an inherent legal property right. To minimize impacts, this means the site must not be permitted for use by private schools or those from other districts. This also means no seating should not be so high as to allow visibility into private properties, and lighting should be focused and not disrupt neighbors.

I21-8

  – The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA system limitations that are consistent with residential use and the regulations of the Parkway Corridor Combining Zone (PCCZ) and the American River Parkway Plan 2008.

I21-9

  – The existing baseline conditions should not include the temporary, portable diesel-powered lights that the District has recently started using. These units have generated intense glare, created safety hazards on nearby roads, disrupted sleep, and emitted harmful diesel exhaust fumes, and their use should be discontinued immediately.

I21-10

- **Biological Resources:** The DEIR/FEIR must provide a thorough analysis of the ongoing impact of event operations along the Parkway on all wildlife, their habitats, and recreational use.

I21-11

- **Cumulative Impacts:** The separately and improperly approved 90-foot cell tower must be analyzed in conjunction with the stadium construction and its operational impacts.

I21-12

Rio must adhere to its own commitment to lights off times and by performing mowing that minimizes dispersement of dust and dry soil in an area where valley fever is very real and settles in adjacent yards. The environmental document should be clear about these practices

I21-13

and how they will be mitigated post project. I21-13 (Cont.)

The document should provide an honest reporting of pre and post project maintenance, what herbicides or other chemicals are currently in use near our homes and the precious nearby waterway. If any, maintenance must be conducted in a manner that limits dust and debris for neighbors, the project should clarify use of any chemicals that are harmful to persons and our parkway and commit to a cessation of use of these chemicals. I21-14

- **Parking and Traffic:** The DEIR/FEIR must provide a comprehensive parking and transportation model for the anticipated 3,500+ people expected to use this stadium and event center. VMT and negative air quality impacts could be reduced by using nearby facilities at El Camino or Mira Loma, both in district and then requiring carpooling to those locations. The suggestion of unsecured, offsite parking is insufficient and does not adequately address the traffic and safety or environmental concerns. I21-15

Lastly, at a time with new school board officials up for election and measures on our ballots to finance our schools, it is extremely disheartening to see that well-intentioned votes to fund educational programs for our schools are ripe for diversion to vanity buildouts for sports infrastructure, particularly at a site where a natural resource is available and free to encourage education in STEM programs like environmental and biological sciences, etc. This move does not engender trust from your constituents. I21-16

-Kimberly Erickson

Letter I22

From: Scott Erickson
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: SJUSD"s DEIR - Rio Americano Stadium Project
Date: Friday, October 16, 2026 3:28:52 PM

This Message Is From an Untrusted Sender
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Report Suspicious

I am writing to voice my strong opposition to the proposed stadium construction at Rio Americano High School. As drafted, this project would deliver an almost 800% increase in bleacher capacity and bring with it a sharp rise in noise pollution, light pollution, traffic congestion, and safety risks. I am deeply worried about what this means for the quality of life in our neighborhoods and for the wildlife that depends on a dark, quiet American River Parkway. Equally troubling, the proposal offers no improved evacuation plan and no meaningful security provisions, leaving students, parents, staff, and attendees genuinely exposed to harm. I22-1 I22-2 I22-3

I recognize that the District would like a stadium at each of its high schools. However, the chosen location at Rio Americano, directly alongside the state-protected American River Parkway, is simply the wrong place for a high-intensity sports and events venue. I22-4

It is also worth remembering that the District, within just the last ten years, built a track field at the very spot now proposed for this stadium. This campus represents a rare opportunity to build a world-class science program, with the Parkway itself serving as an unmatched outdoor classroom. I22-5

Below I have detailed my specific concerns about the project and the shortcomings of the DEIR.

Where the DEIR falls short: I22-6

Event Noise: The DEIR itself concludes that noise pollution is significant and unavoidable even after mitigation. That finding alone should compel the District to put forward a different alternative. Please explain how this project can be reconciled with the Sacramento County Noise Ordinance.

Lighting: The analysis must genuinely assess glare, skyglow, light spectrum, and the nighttime activity that would spill into the Parkway and river corridor. The FEIR should require lighting designed for the maximum achievable reduction in light through DarkSky-oriented design. I22-7

Incomplete Environmental Baseline and Project Description: I22-8

- The DEIR/FEIR must describe the maximum and accurate operating conditions for the stadium, not vague “typical” use scenarios.

- The DEIR/FEIR must commit to concrete Night Event Management Standards, facility-use rules, staffing levels, security arrangements, parking controls, and PA system limits that are compatible with residential neighborhoods, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I22-9
- The baseline conditions must not count the portable diesel lights the District has only recently begun using as if they were an established part of the environment. I22-10

Biological resources: The DEIR/FEIR must evaluate how ongoing event operations along the Parkway would affect all wildlife, their habitat, and public recreational use. I22-11

Cumulative impacts: The separately and improperly approved 90-foot cell tower must be analyzed together with the construction and operation of the stadium, not treated in isolation. I22-12

Parking and Traffic: The DEIR/FEIR must present a real parking and transportation model for the 3,500+ people expected to use this stadium and event center. Relying on suggested, unsecured, offsite parking is not an adequate solution. I22-13

Thank you for your consideration.

-Scott Erickson

Letter I23

From:	Graham Everett
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 8:22:17 PM

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Report Suspicious

To whom it may concern,

I23-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway.

I23-2

This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety.

I23-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium.

I23-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below.

I23-5

Where the DEIR falls short:

I23-6

- Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
- Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.
- Incomplete Environmental Baseline and Project Description – (1) The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. (2) The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. (3) The existing baseline conditions should not include portable diesel lights that the District has only recently started using.

I23-7

- Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use.

I23-8

- Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.

I23-9

- Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model

I23-10

for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

I23-10
(Cont.)

Thank you for your consideration,

Graham Everett
Sacramento Resident

Letter I24

From: Elise Fandrich
To: Rio Americano
Cc: mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 5:54:08 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I24-1 I24-2 I24-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I24-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I24-5

Where the DEIR falls short: I24-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.
Incomplete Environmental Baseline and Project Description –

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I24-7
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I24-8
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I24-9

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I24-10

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I24-11

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I24-12

Thank you for your consideration,

Elise Fandrich

Letter I25

From: Annette Faurote
To: Rio Americano
Subject: NO NEW INTRUSIVE STADIUM ALONG THE WILD AND SCENIC AMERICAN RIVER
Date: Saturday, September 26, 2026 2:51:43 PM

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Report Suspicious

To whom it may concern,

I would like to express my DEEP concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I25-1 I25-2 I25-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I25-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I25-5

I have further outlined my concerns about the project and the DEIR below. I25-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I25-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I25-8

Incomplete Environmental Baseline and Project Description – I25-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I25-10

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I25-10 (Cont) I25-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I25-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I25-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I25-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I25-15

Thank you for your consideration,

Annette Faurote

University Park Homes, Sacramento

Letter I27

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I26-1

October 5, 2026

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I26-2 I26-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I26-4

The American River Parkway is not only my favorite thing about living in the Sacramento area, but it is also a rare and special place that provides habitat for hundreds of species of plants and animals. I especially enjoy watching and listening to the many kinds of birds there. Birds and other wildlife, such as insects, experience the world with different senses that are highly impacted by changes in their environment. Light and sound increases that will result from the new stadium, will effect migration, nesting, food acquisition and more for nearly all bird species. I26-5

Rio Americano High School is not technically on the Parkway, but it sits directly next to it. In the natural world, though, there are no boundaries, so the effects of everything that takes place at the school directly impacts all who live in and near the river. I26-6

The thing is, this can be so beneficial for the school! In addition to being a nature lover, I am also a high school teacher. My school is great, but the physical structure and location can never compare to what Rio Americano has. What a privilege it is to have a school that sits right next to the American River Parkway! To think of the teaching and learning opportunities you have - Biology, Ecology, Art, History, Physical Education - all subjects can be enhanced by the unique real world experience that is directly in your backyard! The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. Why would anyone want to damage the amazing resource located right at your doorstep? I26-7

As a teacher, I want all my students to thrive. I want them to be able to have every opportunity to pursue their passions. I also want them to grow up to have gratitude, to be respectful, and to practice stewardship of their community and the world at large.

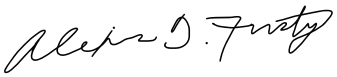
I know the teachers, students, and community of Rio Americano High School want the same thing. And they want to bring their community together and to showcase the passions and talents of their student athletes by building a better stadium.

But is this new stadium the right addition for your school that will help ALL to thrive? Is it necessary and worth the damage it will cause? I26-8

My school doesn't have a stadium or even a playing field. Students utilize facilities nearby and across town. Our teams have thrived anyway, with frequent wins and producing graduates who have earned athletic scholarships. Rejecting the stadium plan does not take anything away from your athletes or this community. Instead, it gives them an opportunity to learn what they and their school value most of all. I26-9

Your school is named after the river. That is not just a title, but a responsibility, and a precious gift. Remember that, and work to protect it for ALL future generations. I26-10

Sincerely,



Alexis Firsty

Letter I27

From:	Marni Fylling
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, September 30, 2026 3:26:31 PM

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Report Suspicious

To whom it may concern,

I am a biologist and educator born and raised in Sacramento, who went to McClatchy High School and UCDavis, and worked at Cosumnes River College. I am very concerned about the stadium construction at Rio Americano High School. There are already so many threats to the American River Parkway, and the impacts to the environment and surrounding neighborhoods by this project would be significant. At McClatchy we used Hughes Stadium, and they still do. It's not necessary to have a stadium on campus. I27-1 I27-2

The American River Parkway is the ONLY federally and state-designated “Wild and Scenic River” flowing through a major metropolitan area in the United States. The Parkway is a national, state and local treasure, vital for our community’s health, recreation and natural beauty. Natural environments protect biodiversity, keep our air and water clean, stabilize the soil, and mitigate the causes and effects of climate change. Many people have worked together for years to establish, protect and preserve this special place for future generations. I’m sure the high school must use the grounds for recreation and science projects. I27-3

A stadium at this scale would overwhelm the Parkway’s tranquil environment, natural setting, and resources with its lighting, sound system, visible structures, and added traffic. The project will increase light pollution, noise pollution, and pose significant, ongoing negative human impacts. It will create permanent visual intrusions to the Parkway, and will jeopardize the delicate balance of local ecosystems and community. The Parkway is habitat for diverse wildlife and serves as a green corridor, rare and important in a metropolitan area like ours. Losing critical habitat will increase the heat in the area and the ability of that land to regulate the climate, and effects of climate change, such as flooding, at a time when we need our wildlands more than ever. The whole reason we need to move toward green energy is because of the loss of ecosystems like this, that naturally regulate the climate and sequester carbon. I27-4

The impacts on the neighborhoods would also be substantial. People in this area purchased their homes for the peace, beauty, and tranquility of the parkway. A sports/event stadium with cause significant noise, traffic, light, and visual intrusion. Large-scale events will exacerbate existing traffic congestion, be dangerous for pedestrians and cyclists, and would forever change the character of the neighborhood. Property values will go down, and once I27-5 I27-6

these changes are made, it will be impossible to recover from. I27-6 (Cont.)

Full transparency, a comprehensive environmental review, and public accountability are necessary before the District proceeds with a stadium at Rio Americano. It is critical to assess all potential environmental impacts through in-depth study and a public evaluation process. The significant cumulative environmental impacts to the Parkway and the surrounding neighborhoods demand accountability from those in charge to ensure that the community's voices are heard and that decisions impacting our shared resources are made with involvement, in-depth study, care and integrity. I27-7

Please take this seriously and proceed properly. Our community and planet's health and welfare depends on it. I27-8

Sincerely,

Marni Fylling-Ellison

Letter I28

From:	Erik Gabele
To:	Rio Americano
Cc:	boardmembers@sanjuan.edu
Subject:	Comments for Draft EIR Rio Americano High School Stadium Improvements Project
Date:	Friday, October 16, 2026 6:39:58 PM
Attachments:	E. Gabele Comments, Draft EIR Rio Americano High School Stadium Improvements Project .pdf

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Report Suspicious

Please see attached .pdf file for my comments relative to Draft EIR Rio Americano High School Stadium Improvements Project. I28-1

Thank you,

Erik Gabele

Subject: Comments on Draft EIR — Rio Americano High School Stadium Improvements Project (SCH No. 2026010094)

October 16, 2026.

As a daily user of the American River Parkway I have several concerns with the Draft EIR for the proposed Rio Americano High School Stadium Improvements project. My concerns are for the operation of the new facility by the School once construction is complete. I28-2

Description of the boundaries of the project's impact are not adequately defined. The northern boundary of the parkway is directly adjacent to the athletic field. The amount of noise and visual intrusions generated by high occupancy events with amplified sound will affect a significant portion of the parkway, where excess noise is likely to carry all the way south to the American river and beyond. The DEIR falls short of focussing on these impacts and mitigations. I28-2

Impacts to recreational users of the parkway are not considered thoroughly and must be revisited. I28-3

Impact 4.3-1b Operations: Noise and vibration are identified as an impact which is cumulatively significant and unavoidable. The levels of noise generated from the stadium will negatively impact the quality of life of nearby neighbors, reducing their property value, and potentially forcing some to leave. I28-4 The noise levels will also have a negative impact on wildlife, which rely on sound for hunting, and predator avoidance within the parkway. I28-5 Cyclists, kayakers, runners, and walkers, many of whom use the parkway south of the school daily, will also be negatively impacted by the stadium noise, forcing some to seek the parkway experience elsewhere. I28-6 The Draft EIR does not do enough to explore stadium use restrictions, and required coordination with negatively impacted neighbors. I28-7 Having PA system shut down at 10:00 is quantifiable and enforceable, however a big concern is how many times a week, month, year will the system be used. This is something that must be addressed. The following items must be explored and coordinated with the school district, Rio Americano Staff, and impacted neighbors: I28-8

- Clearly identify prohibited activities from utilizing the PA system. Table 3-1 shows anticipated events and attendance, however there are other statements in the EIR which indicate other community events could use the stadium. It is also stated that "other" large events could use the new facility (Page 4.2-20). This is unquantifiable and unenforceable. Some examples of prohibited activities are concerts with amplified sound, outside users (non-school entities which may lease the stadium), etc. I28-8

- There should be a memorandum of agreement written by the school and the affected neighbors as to what will be the maximum number of amplified events during the year. I28-9

- Neighbors shall be provided with a schedule of events which will use amplified sound and/or are expected to have high attendance. I28-10

- School should have a staff member identified as a neighborhood/parkway liaison who would be available by phone call to neighbors whenever amplified sound and high capacity events are occurring. This would be the person fielding complaints from neighbors when the noise level of the event gets out of control. I28-11

- SJUSD has already stated within the DEIR that the district and school are not legally bound to any specific noise levels and SJUSD has no formal noise policies. The excess sound will be very disruptive to nearby neighbors, parkway wildlife, and parkway visitors. Clearly quantify what expected level of noise is at neighboring property lines, and at multiple locations within the parkway. Indicate that School must have sound level meters on hand, and that sound levels must be measured and recorded during high occupancy events with amplified sound. This data must be shared with the public. This is an item that could go in the memorandum of agreement between school and surrounding neighbors. Sound levels must also be measured and recorded within the parkway at multiple locations during these events. I28-12

Submitted by:

Erik Gabele
neighborhood resident and parkway user

Letter I29

From:	juliegabele@sbcglobal.net
To:	fhanysha.gaddis@sanjuan.edu; nicholas.arps@sanjuan.edu
Cc:	"juliegabele"; legalservices@sanjuan.edu; construction@sanjuan.edu; mbassanelli@sanjuan.edu; info@sanjuan.edu
Subject:	URGENT: Formal Notice of Omission of Julie Gabele"s Timely CEQA Scoping Comment from DEIR materials; Request for Amended/ Corrections to DEIR Publication of this Omitted Comment, etc.- for proposed RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS Project
Date:	Tuesday, October 6, 2026 5:23:30 PM
Attachments:	image004.png Formal comment - for SJUSD preliminary Initial Study and Notice of Preparation (NOP) for the proposed Rio Americano Stadium Project and upcoming EIR.msg Automatic reply EXTERNAL Formal comment - for SJUSD preliminary Initial Study and Notice of Preparation (NOP) for the proposed Rio Americano Stadium Project and upcoming EIR.msg Read EXTERNAL Formal comment - for SJUSD preliminary Initial Study and Notice of Preparation (NOP) for the proposed Rio Americano Stadium Project and upcoming EIR.msg
Importance:	High

Please review and confirm receipt of the following letter and the attachments to juliegabele@sbcglobal.net.

October 6, 2026

Fhanysha Gaddis, General Counsel
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
fhanysha.gaddis@sanjuan.edu

And

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

SUBJECT: Formal Notice of Omission of Timely CEQA Scoping Comment; Request for Amended/ Corrected DEIR Publication of this Omitted Comment, Formal Consideration of Scoping Issues Included, and Incorporation of this Original Comment into SJUSD formal CEQA Administrative Record – pertaining to **"NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS" - State Clearinghouse # SCH 2026010094.**

Dear Ms. Gaddis & Mr. Arps:

I am contacting you regarding as the lead agency for **San Juan Unified School District's (SJUSD)** proposed **Rio Americano High School Stadium Improvements Project** (hereinafter referred as the **Project)**, to notify you that my timely written comments submitted to SJUSD **on Feb 5, 2026 at 4:56 pm** (pacific standard time) during the formal CEQA scoping comment period, a comment that was received and acknowledged by SJUSD, has been **omitted from the current CEQA Draft Environmental Impact Report (DEIR) and the publicly available CEQA documents and attachments** now being circulated for public review for the Project.

The omission of my formal written comment submitted to SJUSD on Feb 5, 2026 at 4:56pm is deeply concerning, raises serious questions, and I request this be promptly addressed and corrected. I would also like an explanation how my comments were handled and by whom, and if and how they were considered to the scoping of the Draft EIR and by who and when.

Additionally, I request my original Feb 5, 2026 written comment submitted be added now to the DEIR materials, and be acknowledged as part of the formal administrative record. Please provide proof of the inclusion of my comments and recording of these as part of the administrative record, as well as this notice of omission.

The Documentary evidence establishing my timely submission of comments and receipt by SJUSD is particularly clear.

My February 5, 2026 formal written comment was emailed on time and sent to:

- The subject of my email was: **"Formal Comment to SJUSD preliminary Initial Study and Notice of Preparation and scope for upcoming Environmental Impact Report (EIR) for the proposed Rio Americano Stadium Project."**
- sent by email at **4:56 p.m. on February 5, 2026**;
- sent to **SJUSD's designated construction@sanjuan.edu** email address
- copied (cc:) to **nicholas.arps@sanjuan.edu**
- copied (cc:) to **legalservices@sanjuan.edu**
- copied (cc:) to **mbassanelli@sanjuan.edu**
- copied (cc:) to **info@sanjuan.edu**

Then at **5:00 pm on Feb 5, 2026**, only four minutes after my submission, I received an **automated email acknowledgment from the designated SJUSD construction@sanjuan.edu email box** confirming receipt of my comments and stating that the submission had been shared with the appropriate team.

- **Please see the Feb 5, 2026 5:00pm acknowledgement from construction@sanjuan.edu attached.**

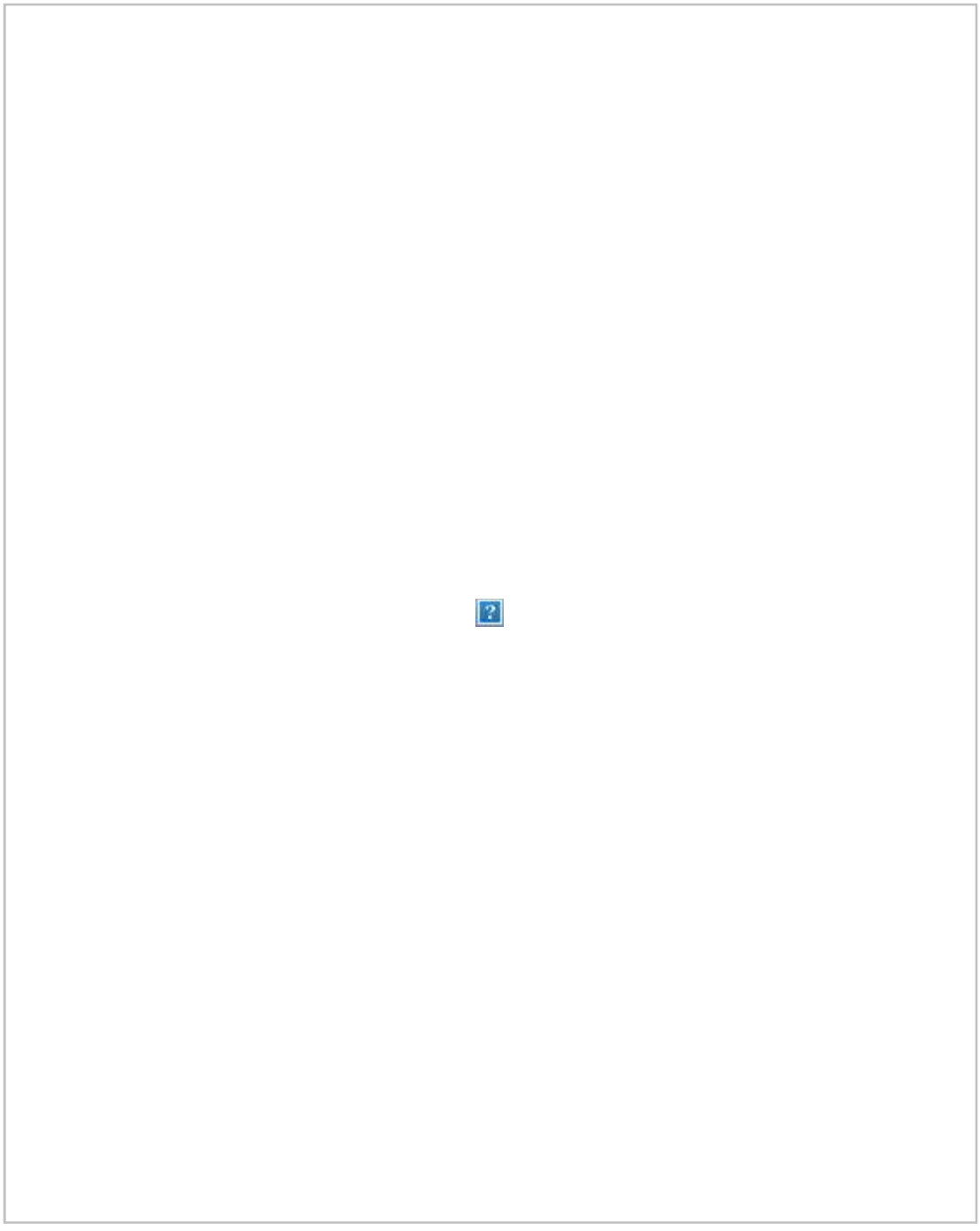
Then at **5:02 pm on Feb 5, 2026**, only six minutes after my submission, I received an **individual email read receipt from Maija Young at SJUSD**, further establishing that the email and attached comment were accessed by an SJUSD employee.

- **Please see the Feb 5, 2026 5:02pm read receipt email from Maija Young with SJUSD I received**.
- It is my understanding that Ms. Young currently supports SJUSD's legal services department and has access to the legalservices@sanjuan.edu email box.

Furthermore, I followed SJUSD specific instructions for written comments, which the SJUSD instructed the public to use, which was the construction@sanjuan.edu email box, for written comments in response to the NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS**.**

The instructions provided to the public for submitting written comment are **found on page 1** of the **NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS released by SJUSD on Jan 5, 2026.**

Please see below - for a copy of page 1 of SJUSD's NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS document.

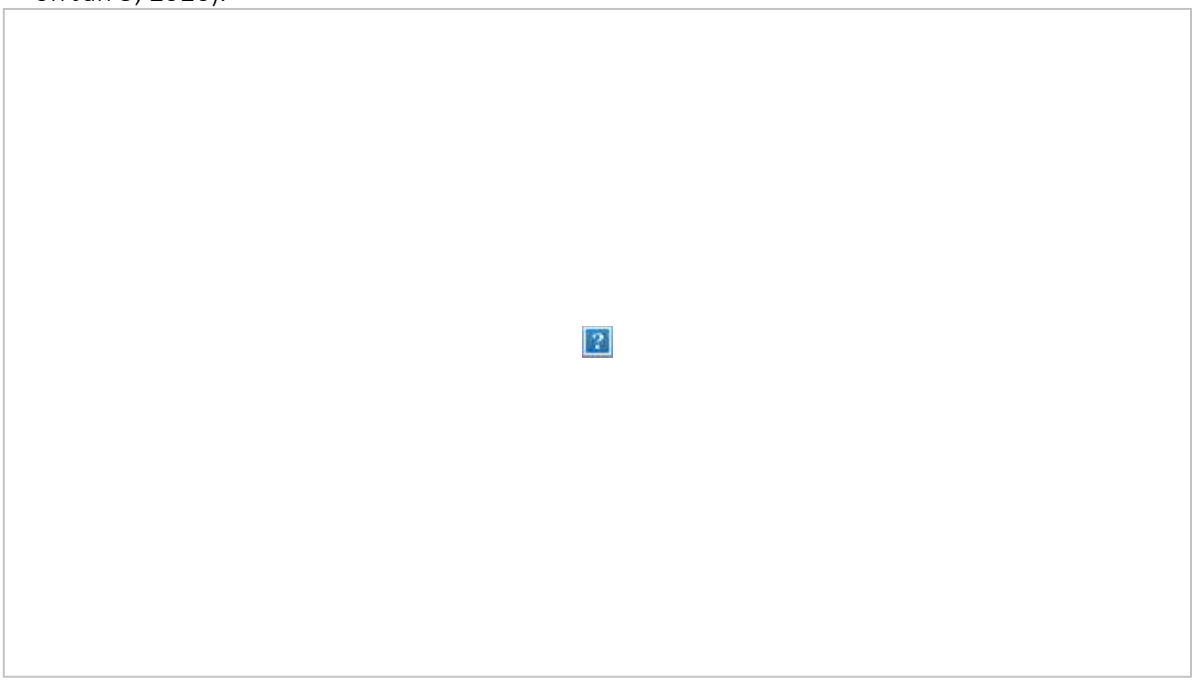


Source from SJUSD document found at SJUSD link: https://www.sanjuan.edu/fs/resource-manager/view/e651f623-12b2-4df7-ac30-3335fb85f902

On **January 7, 2026 at SJUSD's presentation** on the CEQA scoping process to the public at Rio Americano High School (which I attended) use of this email address for formal scoping comments was reiterated.

- Please see picture below (inserted below) from SJUSD's Jan 7, 2026 SJUSD public meeting at

Rio Americano High School, which I attended. The picture shows the slide that Nicholas Arps, SJUSD - Director of Facilities, Construction, & Modernization and Matthew Gerkin AECOM (a consultant working for SJUSD) displayed while informing the public how they could provide comment – including submitting written comment by email to construction@sanjuan.edu for the NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS (a document released on Jan 5, 2026).



This slide was shared at the conclusion of a presentation that Mr. Arps (SJUSD) and Mr. Gerkin (AECOM) delivered on Jan 7, 2026 at Rio Americano High School in public meeting – where they attempted to explain the California Environmental Quality Act (CEQA) and scoping process following the release of NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS. This also advised the public to use construction@sanjuan.edu to submit written comments during the open comment period under CEQA.

Proof, that the construction@sanjuan.edu email address was the correct email address SJUSD itself designated for receiving emailed public written comments – during the formal open comment period **for SJUSD's NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT AND INITIAL STUDY FOR THE RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS.**

There is therefore a contemporaneous documentary record establishing that my timely Feb 5, 2026 written comment was correctly submitted to SJUSD's designated public-comment address, then automatically acknowledged by that specific email address, and subsequently read by an SJUSD employee (Maija Young).

This is not a situation in which there is uncertainty about whether SJUSD received the comment. SJUSD received it. SJUSD's email account issued an automated acknowledgement of receipt, that stated it would be provided to the appropriate contacts. And a SJUSD employee subsequently generated a read receipt. The original comment is preserved. And SJUSD had instructed the public to use the very email address to which the comment was submitted.

SJUSD is responsible for the subsequent **omission of my timely scoping comment from the current CEQA documentation and public environmental-review record.**

I respectfully and firmly request that SJUSD immediately correct this omission by publishing my complete original Feb 5, 2026 written comment in an amended or corrected DEIR document or appropriate DEIR appendix/errata, for SJUSD to document and answer how it was considered in determining the scope and content of the environmental review and formally incorporating the original comment and related records into the Project's formal CEQA administrative record.

I remind SJUSD that the public are important and essential part of the CEQA process.

- **CEQA Guidelines § 15201 (Public Participation):** Declares that public participation is an "essential part of the CEQA process" and requires public agencies to build wide public involvement into their procedures.
- **PRC § 21003.1:** Explicitly states that comments from the public and public agencies are valuable for environmental review and instructs lead agencies to make information available to the public.

The public's role in the scoping of a future Environmental Impact Report (EIR) is instructed by both the **California Public Resources Code (PRC)** and the **California Code of Regulations (CCR)** (aka. CEQA Guidelines).

I provided important and material comments which SJUSD apparently has omitted, has failed to publish, to which I am asking this be corrected. I also want my comments to be made available to the public now, to be included and considered within the scope of the Draft EIR materials available to the public, and absolutely recorded as part of the formal administrative record.

I'm asking this be promptly corrected. Please ensure my Feb 5, 2026 original written comments are made available now in an amended DEIR materials and or addenda/errata to these materials (along with other public comments already shared), so SJUSD staff, your consultants, and other members of the public, other stakeholders, and decision makers can access them as part of the DEIR materials and have time to review and consider them pertaining to the scope of the draft EIR.

I respectfully insist my original comments are recorded as part of SJUSD's CEQA administrative record for this Project and ask you to specifically acknowledge this and provide demonstrable proof this has occurred.

This Was a Substantive CEQA Scoping Comment

My Feb 5, 2026 original written comment to SJUSD provided significant material concerns that require SJUSD's attention and study, raised significant areas not considered, and listed numerous areas that needed to be considered, analyzed, studied, and addressed by SJUSD.

These include inputs on expanding the study to review impacts beyond the proposed project construction and timeline, and to address real and foreseeable impacts from the planned use of this stadium, its new features, significant increased scale, significant increased capacity, use and intensity, multiple cumulative impacts not addressed, and other issues intended uses that will result in numerous and repeat harms not included or properly considered and or analyzed by SJUSD. My comment is not merely a general expression of support or opposition to the Project.

My comment requested and suggested changes to the scope and content of the EIR, identified numerous significant environmental issues of concern, as well as significant community, and public impacts that I believed require SJUSD study. I insisted SJUSD do so via a full and comprehensive EIR, study, and analysis, as well as produce, analyze, and review alternatives.

Among other things, I requested that SJUSD:

- conduct a **full and comprehensive EIR**
- expand the geographic scope of environmental analysis (beyond the campus and project footprint), as these people, resources, and areas adjacent will be significantly impacted by the actual operation and use of this stadium as planned by SJUSD
- analyze impacts beyond the Project site and construction period;
- analyze permanent and recurring operational impacts from the planned use of the stadium, (including but not limited to), its features, significant increased scale, capacity, frequency of planned and foreseeable use, etc.;
- analyze all impacts to the Lower American River and Parkway
- analyze all impacts to wildlife, wildlife corridors, habitat, biological resources, natural resources, and waters, including those resident and or migratory wildlife and species on the Lower American River and Parkway, community nearby, and adjacent areas;
- analyze impacts associated with stadium lighting, campus lighting, sound, increased noise from planned operation and use
- analyze impacts from increased capacity, frequency, duration, and intensity of use;
- analyze public safety issues, increased traffic, impacts on infrastructure, public-service demands, and significant increased crowd-related impacts;
- analyze impacts to surrounding communities on both sides of the river;
- analyze cumulative impacts, including other proposed Rio Americano projects (which are shown in SJUSD Master Plan for this campus);
- analyze and develop alternatives, including the No Project Alternative; and
- AND to significantly revise the EIR scope, study boundaries, timeline of impacts consider (including impacts beyond construction timeframe, to ensure study is done on foreseeable and significant impacts from the operation and use of the Rio Americano stadium as planned by SJUSD, to expand categories, and ensure the EIR has corresponding required studies and analysis for meaningful assessment.
- And analyze other issues noted in my written comment submitted on Feb 5, 2026 at 4:56pm to SJUSD

These are precisely the types of issues that a public scoping process is intended to bring to the lead agency's attention before the DEIR is completed. They are also material inputs that other members of the public, other stakeholders, and decision makers should be made aware.

The Comment Should Have Been Available When SJUSD Determined the Scope and Content of the DEIR

Because my Feb 5, 2026 timely written comment was submitted during the formal scoping period, it should have been available to SJUSD when determining the appropriate scope and content of the DEIR.

- The CEQA scoping process is intended to provide the lead agency with information concerning environmental issues and the appropriate scope and content of the EIR.
- My comment specifically requested that the District reconsider and expand the scope of analysis in several areas.

The subsequent omission of the comment from the current DEIR materials therefore raises a substantive question that SJUSD should answer:

1. Was my Feb 5, 2026 scoping comment actually provided to and considered by the persons responsible for determining the scope and preparing the DEIR?
2. If it was considered, SJUSD should identify how and by who?
3. If it was not considered, SJUSD should explain why.
4. If the comment was omitted from the materials provided to the environmental consultant or Project team, SJUSD should disclose that fact and determine whether the omission affected the scope or content of the environmental review.

The Current Public CEQA Documents Should Not Create an Inaccurate Record of the Scoping Process

- The current DEIR and related CEQA materials should accurately reflect the substantive public input that SJUSD actually received during scoping.
- Leaving my Feb 5 2026 comment out of the public environmental-review materials creates the potential for the current record to suggest that these issues were not raised during scoping.

Please provide a written reply and detailed reply and updated to SJUSD actions to correct the omission of my formal Feb 5, 2026 written comments, answers to my questions on the handling of my comments, and update on SJUSD publishing my comments within the DEIR materials so the public, stakeholders and decision makers all have adequate time to access and review now.

Please also provide specific proof my formal comments are recorded as part of the formal administrative record and explanation of such (including tracking process, unique tracking identifier assigned, etc.).

Please also confirm receipt of this email and all its supporting attachments.

Thank you,

Julie Gabele
Sacramento, CA
juliegabele@sbcglobal.net

Attachments Include:

- My original email from Feb 5, 2026 at 4:56pm and the attached .pdf file with my Feb 5, 2026 written comments submitted to SJUSD.
- The Feb 5, 2026 5:00pm acknowledgement of receipt of my email from construction@sanjuan.edu attached.
- The Feb 5, 2026 5:02pm **read receipt email from Maija Young** with SJUSD I received – when my original email was opened by Ms. Young.

Letter I30

From:	juliegabele@sbcglobal.net
To:	Rio Americano; fhanysha.gaddis@sanjuan.edu; nicholas.arps@sanjuan.edu
Cc:	boardmembers@sanjuan.edu; legalservices@sanjuan.edu; construction@sanjuan.edu; mbassanelli@sanjuan.edu; info@sanjuan.edu; juliegabele@sbcglobal.net
Subject:	Time sensitive - Request All Public Comments Omitted be included in CEQA NOP, Initial Study, & Scoping Comments, & Amend & Correct SJUSD DEIR Publication, Extend/Recirculate DEIR - for Rio Americano High School Stadium Improvements Project - SCH # 2026010
Date:	Thursday, October 15, 2026 2:45:28 PM
Attachments:	image001.png URGENT Formal Notice of Omission of Julie Gabele"s Timely CEQA Scoping Comment from DEIR materials; Request for Amended Corrections to DEIR Publication of this Omitted Comment etc.- for proposed RIO AMERICANO HIGH SCHOOL STADIUM IMPROVEMENTS Project.msg
Importance:	High

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

Oct 15, 2026

Fhanysha Gaddis, General Counsel
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
fhanysha.gaddis@sanjuan.edu

And

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

AND

SJUSD CEQA Team (care of AECOM email)
RioEIRcomments@aecom.com

CC: San Juan Unified School District - School Board (distribute to all board members please)

SUBJECT: Request All Public Comments Omitted be included in CEQA NOP, Initial Study, Scoping, & DEIR Comments, & Amend & Correct SJUSD DEIR Publication, Extend/Recirculate DEIR - for Rio Americano High School Stadium Improvements Project - SCH # 2026010094.

Dear SJUSD CEQA Team, Ms. Gaddis, & Mr. Arps,

Please provide confirmation this email has been received. Please include this communication and the attachments in the published comments to DEIR and administrative record.

In review of San Juan Unified School District (SJUSD) **Draft Environmental Impact Report for Rio Americano High School Stadium Improvements Project and supporting attachments**, I've found many problems with the study and supporting materials. Just one area of many – **involves the omission and handling of formal public comment,** which appears to demonstrate a lack of consideration and proper handling of public comment inputs submitted to SJUSD vital to a comprehensive CEQA study and scope, as well as impairs SJUSD's ability to identify concerns and foreseeable significant impacts that must be addressed. It also distorts the CEQA record.

I already notified SJUSD on 10/6/26 of the omission of **my timely Feb 5, 2026 4:56pm formal comments emailed to SJUSD** pertaining to the NOP and Initial Study and scope for the upcoming Draft Environmental Impact Report for Rio Americano High School Stadium Improvements Project. **My Feb 5, 2026 email was received by SJUSD, acknowledged upon receipt, but omitted from the DEIR materials. See attached URGENT email to SJUSD I sent on 10/06/26 (and supporting attachments within).**

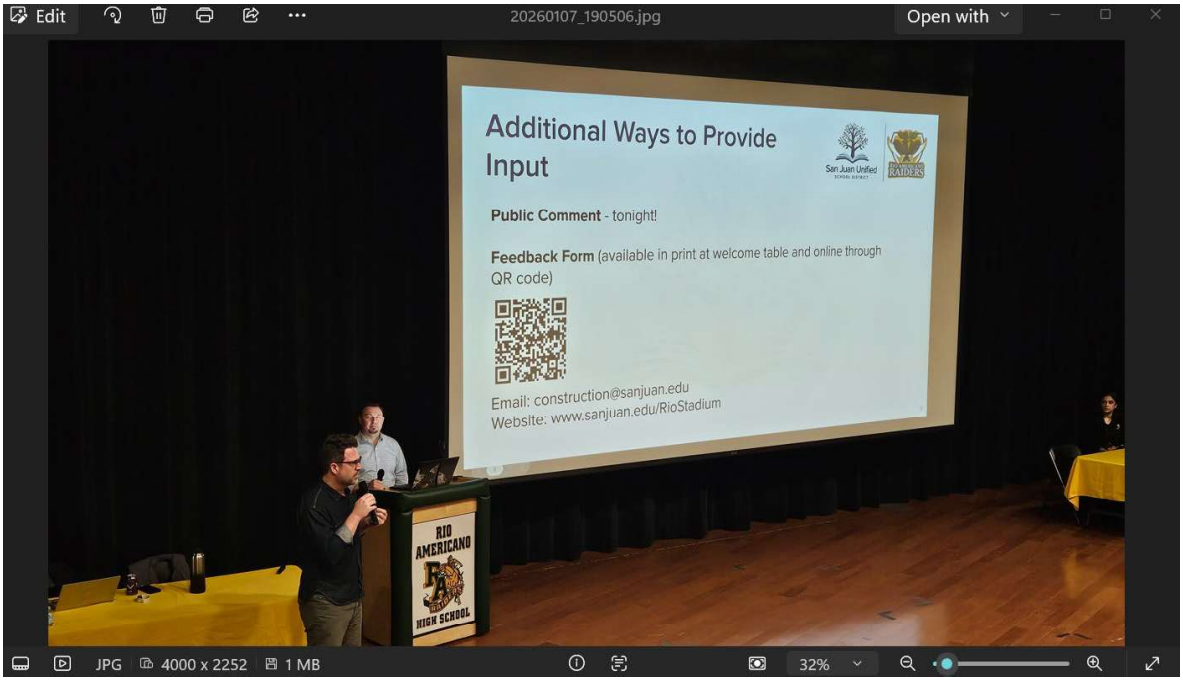
- I notified SJUSD of this omission and requested SJUSD provide a detailed explanation to the handling of my Feb 5, 2026 comments – but that was not provided.
- I asked my Feb 5, 2026 comments to be published now before the DEIR public comment period closed with time for other reviewers to access and consider them, including the public, agencies, trustees, stakeholders, decision makers, etc.….but SJUSD declined to do so,
- I asked if my scoping comments had even been reviewed and considered for the scope and study of the Draft EIR, and was instead told my comments were "inadvertently" omitted – but were raised by other commenters (which somehow implies they were considered as intended) – **which upon further review I disagree and invite your SJUSD CEQA team to respond and point out where each of my original comments enclosed in my email on Feb 5, 2026 at 4:56pm that provided detailed comments, suggestions, and concerns are addressed in the DEIR.**
- I also insisted my original comments from Feb 5, 2026 be part of the administrative record and included with explanation of its omission – to which I was told they would instead be placed in the Final EIR materials – but it's unclear how you plan to present them and notify public and decision makers of the mishandling and prior omission.

This delay and omission in publication deprives the public, and all stakeholders, and decision makers of timely access to information and substantial comments <u>that should have been published</u> during an active and important part of the CEQA process, and potential for inaccurate record.

Now – it appears SJUSD and or its representatives have failed to publish <u>all public comments submitted and received by SJUSD</u> (and or SJUSD consultants/representatives) pertaining to the **Rio Americano High School Stadium Improvements Project** <u>received during the formal open comment period for the NOP and Initial Study.</u>

SJUSD solicited public input during the open comment period in multiple forms:

- As evidenced in the attached & enclosed picture - from SJUSD's public meeting on Jan 7, 2026 – slide shows the QR code linked to an online comment form SJUSD shared in that same public meeting. I believe this QR code resolved to https://forms.sanjuan.edu/253166118681964 - but QR code has since been discontinued or form removed - please confirm the actual prior URL QR code and form input collected with your SJUSD team.



- This online form was also linked previously to SJUSD's webpage dedicated to Rio Americano High School Stadium Improvements Project and available during the open comment period through Feb 5, 2026.

- I actually viewed and submitted inputs to this online form. Others I spoke to also used this form when it was available in past.

The current DEIR and related CEQA materials <u>DO NOT appear to include all the substantive public input that SJUSD actually received</u> during formal comment period for NOP and Initial study (such as the SJUSD online form and paper methods).

> Leaving comments out of the public environmental-review materials available and important to the public and other entities reviewing the DEIR creates a number of issues – including (but not limited to) suggest that the public comments and issues provided were not considered during scoping and preparation of the Draft EIR, as well as an incomplete CEQA record.

It's deeply concerning that public input and vital information is being mishandled and or obscured by SJUSD from the public.

<u>Therefore, I request:</u>

1. **Please immediately publish to the Draft EIR and include a copy of all public responses and comments submitted <u>via the online form</u> SJUSD offered during the open public comment period for the NOP and Initial Study for the Rio Americano High School Stadium Improvements Project.**

   <u>And respectfully answer and respond per each - to the following questions/request:</u>

   a. Why was this data omitted from DEIR materials and not included for the public to review and other entities to review?
   b. Were each of these scoping comments actually provided to and considered by the persons responsible for determining the scope and preparing the DEIR?

c. Who at SJUSD and AECOM reviewed these?
d. Please include name and role of individuals in CEQA scoping and environmental study process responsible who actually reviewed them.
e. If any of the online inputs and or comments were not considered, please explain why?
f. If the comment was omitted from the materials provided to the environmental consultant or Project team, SJUSD should disclose that fact and determine whether the omission affected the scope or content of the environmental review.

2) **Please immediately publish and include a copy of <u>all paper copies of</u> public comment submitted to SJUSD for the Rio Americano High School Stadium Improvements Project during the open comment period for the NOP and Initial Study for the Rio Americano High School Stadium Improvements Project.**

<u>And respectfully answer and respond per each - to the following questions/request:</u>

-

a. Why was this data omitted from DEIR materials and not included for the public to review and other entities to review?
b. Were each of these scoping comments actually provided to and considered by the persons responsible for determining the scope and preparing the DEIR?
c. Who at SJUSD and AECOM reviewed these?
d. Please include name and role of individuals in CEQA scoping and environmental study process responsible who actually reviewed them.
e. If any of the online inputs and or comments were not considered, please explain why?
f. If the comment was omitted from the materials provided to the environmental consultant or Project team, SJUSD should disclose that fact and determine whether the omission affected the scope or content of the environmental review.

2. **Please also include any follow-on public comments received - that were considered, despite arriving after the open comment period.**

<u>And respectfully answer and respond per each - to the following questions/request:</u>

a. If considered, why were these comments not included in DEIR materials?
b. Why was this data omitted from DEIR materials and not included for the public to review and other entities to review?

3. Please also pause conduct a thorough investigation and review to identify any other formal comments submitted by the public, and or any other organization and or individual submitted to SJUSD or its representatives during the formal comment period that have been omitted and not included in the DEIR and PUBLISH THOSE in the DEIR materials now (not later).

4. Please explain why these comments and data were omitted from the public comments in Attachment A for Draft EIR or elsewhere in the DEIR materials?

There are other numerous problems and deficiencies well beyond this with the DEIR itself, missed scope, inadequacy of study, misconstrued inputs, numerous errors and inconsistencies, ineffectual references, broken or useless links, and lack of supporting study, understanding, and materials provided. In addition to the omissions of public comment provided during formal comment period – all deeply concerning.

<u>Extension and Recirculation Request:</u>

Please review and correct your DEIR materials, extend and or recirculate the DEIR, and publish an amendment or errata of some sort to include the missing public comments with explanation.

Please include this letter in the public comments of the DEIR, Final EIR, and part of the published formal administrative record.

I will send additional comments and questions to the DEIR, as well.

Thank you,

Julie Gabele
Sacramento, CA

Letter I31

Oct 16, 2026

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

Subject: Formal Comments on Draft Environmental Impact Report (DEIR) for the proposed Rio Americano High School Stadium Improvements Project

Dear Nicholas Arps & San Juan Unified School District:

Thank you for the opportunity to provide my comments regarding the **Draft Environmental Impact Report (DEIR) for the proposed Rio Americano High School Stadium Improvements Project.** I urge the District to revise and recirculate the Draft EIR if necessary, and to prepare a Final EIR that provides a complete, accurate, transparent, and evidence-based assessment of the project's foreseeable environmental consequences before any decision to approve the project. I31-1

The Draft EIR's conclusion that the project would have "no impact on recreationists within the Parkway" (DEIR, pp. 5.13-33–5.13-34) is a central and consequential deficiency. It fails to adequately account for the people who use and depend on the Wild & Scenic Lower American River Parkway, the experiences and benefits they derive from it, and the foreseeable effects of substantially intensifying stadium operations immediately adjacent to this protected natural and recreational resource. I31-2

The District must evaluate the project as a whole, including its permanent physical features, intended operational capacity and use, frequency and duration of use, school-sponsored activities, non-school events and rentals, and interactions with other existing and reasonably foreseeable activities and development. I31-3

The environmental analysis cannot reasonably be limited to the construction footprint or timeline (that is actually temporary), the immediate school property, daytime impacts, nighttime impacts, revised lighting, visual impacts, noise impacts, public safety impacts are all not adequately representative, distorted by limited study, limited observation points, or incomplete assumptions and data models. Others are not included and or too narrowly defined. I31-4

I urge SJUSD to revise and rework the DEIR, expand study, scope, fulfill a more complete baseline, and also provide details of planned use that are not described or I31-5

evaluated, but must be in order for adequate consideration of such a consequential project and its impacts. I31-5 (Cont.)

Please ensure impacts to recreational and parkway users, everyday people on the parkway of all ages, background, and ability are more fully understood, level of use and value, benefits they derive, reliance on these benefits for decades that this project would diminish or remove, and ensure a detailed study, consideration, and assessment be returned in DEIR and Final EIR that accurately captures the numerous and foreseeable impacts from the operation and use of the stadium (which is part of the whole CEQA action), as well as cumulative impacts of other campus facilities and use, corresponding use and schedules, and other planned facilities (shown in SJUSD Master Plan for Rio Americano High School which cumulatively will exacerbate these issues even further. I31-6 I31-7

This proposed stadium project is a want and not a need – students attending Rio Americano come from broad range of geographic locations (students live in Gold River – which is east of Sunrise Blvd, Fair Oaks, River Park, Rosemont, Sierra Oaks, Arden Park, Arden Arcade, etc. in addition to neighborhoods in walking distance radius close to school). And many I have met would have otherwise attended a different school and or completely school district due where they actually live. Which means one location that some will say is closer to where they live, will be farther for others. Playing at El Camino High School is not a hardship, as it is 3 miles away from Rio Americano (and short drive with much better thoroughfare, stop lights, and multiple lanes better adept and able to handle the capacity of large capacity of attendees (and has been successfully used for years). I31-8

The proposed stadium foreseeable impacts are profound – and will introduce numerous avoidable significant impacts to thousands of existing recreational parkway users (i.e. regular people just trying to find quiet place of calm and respite, quiet trails, or place to rest in natural setting, study, etc.), as well as neighbors, surrounding neighborhoods, public, people passing by, and surrounding community on both sides of the river. I31-9

Transforming this modestly used field – to a substantially larger stadium, with expanded seating and capacity for at least 3400+ people or more, elevated structures, multiple tall light masts, amplified sound, and multiple supporting lighting, and infrastructure, beside a nationally significant Wild & Scenic Lower American River & Parkway – a parkway used daily for recreation, nature observation, exercise, education, respite, and access to nature - is not a good fit. I31-10

The Parkway and river's value is not limited to its physical acreage or the continued availability of a trail, waters or habitat. It also encompasses the quality of the experience, the natural environment, the opportunity to encounter wildlife, it serves a place to meet neighbors, connect with family and friends, or visit individually for respite,

exercise, passive recreation, and place and time for peace and relative quiet which draws countless people to this Parkway, and is so valued and needed by people of all ages and backgrounds.

The Draft EIR must acknowledge, investigate, expand scope and study, to disclose these effects rather than assume that they are insignificant.

I31-10 (Cont.)

I. The Draft EIR Must Recognize Parkway Users as Important Receptors of Environmental Impacts

I31-11

The Draft EIR does not adequately identify, characterize, or evaluate the full range of people and activities that may be affected by the project. Its treatment of recreationists is particularly deficient because it does not meaningfully evaluate the consequences of repeated stadium noise, cumulative noise, increased activity, permanent visual intrusions, changes in the character of the setting, and displacement of existing recreational use.

The Parkway is used by a broad and diverse public, including:

- Walkers, hikers, runners, joggers, and cyclists.
- People who fish, kayak, paddle, swim, observe birds, photograph wildlife, or study nature.
- Individuals and families seeking quiet, calm, and relief from the pressures of daily life.
- Children, students, educators, researchers, and school groups learning about wildlife, habitat, and the natural environment.
- Older adults and people with disabilities or mobility limitations, including people who use wheelchairs, walkers, and canes.
- Individuals who rely on outdoor exercise, restorative natural settings, and accessible public open space to support their health and well-being.
- People sitting on benches, resting along trails, studying, or simply experiencing the river and its surroundings.

These activities are not incidental to the Parkway. They are among the reasons the public values and uses this resource.

The District must assess how the proposed stadium's scale, noise, visual presence, operating schedule, and increased attendance could diminish these experiences. A person may still be physically able to enter the Parkway while experiencing a substantial loss of the very qualities that made the visit worthwhile.

For example, the continued existence of a trail does not establish that recreational impacts are insignificant if repeated crowd noise, public-address announcements, whistles, bands, amplified sound, and event activity materially interfere with wildlife observation, quiet recreation, outdoor learning, fishing, or the restorative experience of being in nature.

A public resource can remain physically accessible while its enjoyment, character, and functional value are diminished. And parkway users already alter their behaviors due noise impacts – which would be exponentially and repeatedly subjected to with increased proximity, level, frequency of occurrence, as well as new unwanted visual intrusions, loss of wildlife, nature viewing, wildlife viewing (who run, fly or scurry away when presence of human activity and noise), which is cascading effect on parkway diminished value for users, many who will seek other places to go – pressuring other portions of the parkway, parks, etc.

I31-11 (Cont.)

Please correct this scope and conduct revised study – starting with a more accurate understanding and representation of parkway users, hours of impact, source of impacts, boundary and location of impacts, and do the same wildlife, and other receptors (neighbors) – from what are significant foreseeable impacts and harms from the proposed whole action in the DEIR and Final EIR. And ensure this and other studies are provided and well explained in narrative and plain language the public and decision makers require (also consistent with plain language and explanation of technical reports, etc.).

I31-12

The biological resources (wildlife, flora and fauna, wetlands, etc.) are also not well defined and understood in the DEIR. The DEIR reference links in many cases do not work and the state and federal fish and wildlife links – take public to a general landing pages with numerous choices of tools, databases, interactive maps, where the public has no way to know what actual report was used, what criteria the DEIR preparers selected, and cannot independently validate. Please correct these issues in the DEIR and Final EIR.

I31-13

Even the CDE link for student demographics is wrong and if you try to access tool and build your own report (a password is required) and it is unknown to public reviewer what criteria DEIR preparer used. Please ensure these are corrected and copies of actual reports, actual resulting map view and data points selected are included in the DEIR and Final EIR for review by public and decision makers. Obscuring this data and either missing or poor narratives is an issue that adds to deficiency of the DEIR.

I31-14

Please also provide the most complete design documents, specifications, supporting narratives, maximum occupancy load, and design blueprints that allow public to assess where, what, distances, planned location, height, and

I31-15

profiles of what is being planned. The images, graphics, and renderings in DEIR are very poor and fail to adequately inform. The renderings shared outside of DEIR are also very poor and quite distorted, and not of much value to reviewer and or decision makers.

Please correct this in DEIR and Final EIR - by providing relevant detailed design documents, accurate specifications and materials, and useable information, specifications, and narrative in plain language to accompany this for the proposed stadium project and whole action in the DEIR and Final EIR. As well as other projects that factor into cumulative review and analyses.

I31-15 (Cont.)

Required action

The Final EIR must:

I31-16

1. Identify Parkway users as a distinct group of potentially affected receptors for whole action and operational use and impacts, rather than treating recreational impacts as adequately addressed by construction analysis or by analyses prepared for other environmental topics.

I31-17

2. Please also correct false and or misleading assumptions – for example saying light impacts are nighttime hours only. And furthering that by saying parkway users not there when lights on.
    - This is not true today. I personally have experienced on repeat occasions glare and irritation of lights from Rio Americano from pool, adjacent parking lots, walkways, security light on west side of campus faced to parkway, and observed portable lights activated and in use at sunset and dusk.
    - Also, Junior varsity games at other locations start at 5pm or 5:30pm and we cannot assume these will not be played at those times – again when parkway users are present.
    - And event Varsity games start at 7pm (but parkway is still in use often).

I31-18

3. Describe the principal recreational, educational, ecological, health, and wellness activities occurring in the affected area.

I31-19

4. Analyze the effects of both individual events and repeated operations over time.

I31-20

5. Evaluate the potential for displacement of existing users and changes in the quality, distribution, and intensity of recreational use.

6. Identify the geographic extent of effects, including trails, levee paths, river access points, fishing areas, wildlife-viewing locations, and other areas where the project's noise and visual features may be experienced. I31-21

7. Explain, with substantial evidence, why any identified impact would or would not be significant under the applicable CEQA thresholds. I31-22

The District must not presume that an impact is insignificant, merely because it does not physically eliminate a recreational facility or prevent access to it. I31-23

II. The Conclusion of "No Impact on Recreationists" Is Unsupported and Must Be Reconsidered I31-24

Pages 5.13-33 through 5.13-34 of the Draft EIR state that the proposed project would have "no impact on recreationists within the Parkway**." This conclusion warrants a substantially more rigorous analysis – please conduct and include in DEIR and Final EIR.**

In the DEIR and Final EIR evaluation – please consider how the project would introduce or expand multiple sources of disturbance in an area immediately adjacent to the Parkway, including: I31-25

- **Substantially expanded bleacher seating and increased spectator capacity Impacts**
- **Vibration from crowd noise, including stomping on bleachers, other actions that impact parkway, people, wildlife, and or neighbors' homes and property.**
- **Expanded assessment of key observation points on Parkway locations, including levee tops, paved trail, river, braided ponds, river, cross river sight lines** I31-26
- **Expanded noise and sounds from use and operation spilling into parkway and other perimeters in increments and profiles that study and consider real world experience that parkway users can and will hear.** I31-27
    - **I already noticed and experienced noise from the more modest use, amplified sound that is nuisance, stressor, and unwanted encroachment of noise expected on the parkway in multiple locations in radius of RIO Americano.**
    - **These impacts must be understood and studied – to inform decision makers in the DEIR and Final EIR – please include this.**

- **Maximum Occupancy loads of stadium and other facilities need to be stated. Include baseline today and future loads please** I31-28
- **Correct study and revise statement of impacts supported by expanded and revised analysis and expand key observation points and site lines from proposed elevated press box and other permanent structures.** I31-29
- **Correct study and revise statement of impacts supported by expanded and revised analysis and expand key observation points and site lines from the parkway and other surrounding areas for all proposed 80-foot stadium light masts.**
    - **I stood behind Rio Americano on parkway in multiple locations – which included multiple trails paved and unpaved, trail areas inside vegetation, at benches meant for quiet reflection in both west , east, and behind the athletic field that SJUSD wants to conduct improvements, and standing in these points behind and near Rio Americano I could easily see lights, good portion of top of light posts used for walkway, parking, and glare of lights for security lighting on west side campus, the yellow goal posts of field from multiple points in parkway, and open stretches of trails (which I estimate goal post at highest is 35 feet – so guessing 20 feet hidden by levee). Which contradicts the assumptions of the DEIR today. I have pictures and can provide those to SJSD team and walk with you on parkway to show you.**
- **Correct study and revise statement of impacts, supported by expanded and revised analysis and expanded key observation points and site lines on the parkway and other surrounding areas for all additional lighting proposed and associated with parking, walkways, and other project elements.**
- **Impacts from the proposed public-address system and amplified sound.** I31-30
- **Impacts from spectator activity, crowd noise, whistles, bands, announcements, and other event-related sounds.**
- **Impacts from Increased attendance, bike, vehicle and pedestrian activity, and potential use of the Parkway to access school events,** I31-31
- **Impacts from increased number of people on parkway trails paved and unpaved itself, levee top, etc. (wandering from events before, during, and after).**
- **Impacts from potentially more frequent and varied events resulting from school activities and non-school use or rentals.** I31-32

- **New uses of rentals and non-school activities must also be evaluated and considered, as SJUSD has discussed this briefly, but DEIR lacks clear description, analyses, and evaluation of impacts.**

I31-33

These elements must be evaluated collectively in the context of the proposed stadium's actual intended operation and use. Please address the above in the DEIR and Final EIR.

I31-34

The Draft EIR's discussion does not adequately establish why this combination of permanent infrastructure and recurring activities would have no effect on Parkway users. Nor does it adequately demonstrate that conclusions concerning construction or other environmental topics resolve the distinct operational impacts to recreationists.

Please ensure DEIR and Final EIR explain the analytical basis for its conclusion, identify the relevant evidence, and address the full range of reasonably foreseeable effects. If the evidence supports a potentially significant impact, the EIR must disclose that impact and identify feasible mitigation. If the District concludes that the impact is less than significant, it must provide a reasoned explanation supported by the evidence rather than relying on an unsupported assertion.

Required action: Reevaluate the recreation impact determination, disclose the effects on Parkway users, and revise the analysis and significance conclusion as warranted by the evidence.

III. The District Must Accurately Define the Project's Intended Operations, Maximum Capacity, and Use Restrictions

I31-35

A fundamental problem with the Draft EIR is that the public cannot reliably determine the maximum intensity of the proposed stadium's future use.

The project materials describe expanded seating and a substantially larger venue, but the Draft EIR does not adequately establish a clear, enforceable maximum occupancy for the stadium or explain the maximum number of people who may be present across the campus during simultaneous activities.

The stadium project proposes approximately 2,575 bleacher seats, compared with approximately 288 existing bleacher seats. The proposed seating represents 894% increase in bleacher seating alone. The Draft EIR and associated materials must reconcile these figures with the stated overall attendance expectations and any references to events involving estimates of 3,400 or more people. And also, must clarify maximum occupancy of stadium and other campus facilities – when in use singularly and also total campus occupancy capacity overall. There are no known caps discussed

that are committed to by SJUSD, so public and decision makers are left guessing and uninformed.

Bleacher seating, total stadium occupancy, and total campus occupancy are different measures. They must not be conflated.

The District must identify the maximum number of spectators, athletes, staff, event personnel, vendors, and other attendees permitted for each relevant configuration, including standing-room or other occupancy where applicable. It must also establish the maximum total campus occupancy when multiple facilities and activities operate simultaneously.

The analysis must not rely on selected historical attendance estimates or examples of smaller events as substitutes for the maximum foreseeable use of the proposed facility.

Please address these issues and provide the necessary study, facts, data, and explanation in the DEIR and Final EIR.

I31-35
(Cont.)

The Draft EIR must establish:

I31-36

1. The maximum legal and operational occupancy of the stadium, including the basis for each figure.
2. The maximum total campus occupancy during simultaneous events and activities.
3. The types of school-sponsored events that may use the stadium and their anticipated attendance.
4. The types of non-school events and rentals that may be permitted, including whether concerts or other amplified events could occur.
    - Please include what is allowed and not allowed for non-school events and activities planned and or considered for future use – and please do not confuse or conflate this with terminology.
5. The anticipated number of events by type, season, day of the week, and time of day.
6. The maximum number of events permitted per day, week, month, and year, including concurrent events.
7. The expected duration of events, rehearsals, setup, teardown, sound checks, and post-event activities.
8. The operating hours for amplified sound, lighting, and other stadium functions.
9. Any proposed limits on attendance, sound levels, event frequency, duration, and simultaneous campus use.
10. The enforceable conditions, monitoring procedures, responsible parties, and corrective actions that would ensure compliance with those limits.

These are not administrative details that can be deferred until after environmental review. They determine the project's environmental footprint and are essential to assessing its potential impacts.

Where the District has not established enforceable limits, the EIR must analyze the reasonably foreseeable range of uses the project would allow. It cannot assume that an undefined use will remain limited to a narrow set of activities or that future discretionary management will eliminate potential impacts.

Please provide this information and analysis in the DEIR and Final EIR.

IV. The District Must Analyze Operational Impacts During the Day, Evening, and Night I31-37

The Draft EIR appears to give disproportionate attention to nighttime lighting and certain evening conditions, while inadequately addressing the full range of impacts from daytime and evening operations.

The project is intended to support multiple sports, school-sponsored activities, and potentially non-school events. Those activities may occur during morning, afternoon, evening, and nighttime hours. Football is only one potential use, and the environmental consequences cannot be defined by reference to a single sport or event schedule.

Junior varsity football games, for example, may begin in the late afternoon, while other sporting activities, rehearsals, and events can occur at different times. The Final EIR must establish the actual anticipated schedule and the reasonably foreseeable operating envelope rather than assume that significant impacts occur only after dark.

Daytime operations can generate substantial crowd noise, amplified announcements, band activity, whistles, and recurring disturbances to people and wildlife. Daytime use also affects the visual character of the Parkway through the presence of permanent structures and event activity, regardless of whether the stadium lights are illuminated.

Evening operations can introduce additional lighting and nighttime visual intrusions, extend disturbances into sensitive periods for people and wildlife, and create further effects associated with arriving and departing crowds.

Required action I31-38

The Final EIR must evaluate representative and reasonably foreseeable operating scenarios, including:

- Morning and daytime school activities.
- Afternoon sporting events and practices.
- Late-afternoon and evening games.
- Band rehearsals, performances, announcements, and amplified sound.
- Nighttime events using stadium lighting.
- Events using the stadium without its principal lights illuminated.
- Non-school events and rentals, if allowed.
- Multiple simultaneous events elsewhere on campus.

- Event setup, teardown, sound checks, arrivals, departures, and associated activity before and after the main event.

I31-38 (Cont.)

For each relevant scenario, the District must disclose the expected sources, intensity, duration, frequency, and geographic extent of noise and other disturbance, together with the affected receptors and the basis for the significance determination.

The District must also explain how the proposed operations would be constrained in practice. General statements describing anticipated use are not substitutes for binding operating conditions.

V. The Noise Analysis Must Address Actual Exposure, Repeated Disturbance, and Parkway Use

I31-39

Noise is one of the most consequential foreseeable impacts of the proposed stadium because it can extend beyond the school property and affect both people and wildlife in the adjacent Parkway.

The Draft EIR must adequately address noise from the full range of proposed activities, including crowd noise, public-address announcements, amplified music, bands, whistles, cheering, event personnel, and other recurring sources.

It must also consider the combined effects of multiple sources, the duration and frequency of events, the timing of disturbance, and the extent to which sound travels into the river corridor and adjoining recreational areas.

My direct observations demonstrate why the geographic scope of the analysis must be reconsidered. Sounds from existing sporting activities can be heard from locations well within the Parkway, including deeper trail areas near the braided ponds and William B. Pond. I have heard a Rio Americano water polo horn from the far reaches of William B. Pond island after entering from the Arden Way access. I have also heard daytime rugby activity while observing Northwestern pond turtles and herons in riparian habitat right next to Rio Americano (with students from Rio standing next to me).

These observations are not a substitute for acoustical measurements. They are evidence that warrants appropriate investigation of sound propagation and actual receptor locations. The proposed stadium would have substantially expanded seating and the potential for more intensive and varied events. The District must not assume that noise effects will remain confined to school grounds.

Please make sure the Final EIR addresses and evaluates these concerns and establishes a revised existing ambient condition at representative locations, including locations within the Parkway where people engage in quiet recreation and observe wildlife. It should then evaluate predicted sound levels and changes

in the acoustic environment under representative and reasonably foreseeable operating conditions.

I31-39 (Cont.)

The analysis should include appropriate metrics for both sound level and duration, distinguish relevant average and maximum sound levels, and address event-specific characteristics that may not be adequately represented by a single averaged measurement.

It should also explain the assumptions used for crowd size, crowd behavior, amplified sound, band activity, operating duration, simultaneous events, and propagation across the site and river corridor.

Where applicable, the District should evaluate intermittent, impulsive, tonal, and other distinctive sound characteristics, as well as the effects of repeated exposure and the contrast between event noise and the relatively quiet conditions sought by Parkway users.

The EIR should not treat compliance with a general property-line standard, if applicable, as automatically resolving the separate question of whether recurring event noise would substantially interfere with recreation or disturb wildlife.

Required action

I31-40

The District must:

1. Conduct or provide a technically adequate acoustical analysis using clearly identified assumptions, methods, measurement locations, and supporting data.
2. Include representative Parkway receptors, nearby residential receptors, and relevant wildlife habitat locations in the analysis. I am happy to talk with SJUSD team.
3. Evaluate daytime, evening, and nighttime conditions, including events without stadium lighting.
4. Analyze cumulative sound from simultaneous campus activities and relevant existing or reasonably foreseeable sources.
5. Establish enforceable limits on amplified sound and other controllable sources, with specified measurement methods, monitoring locations, and corrective actions.
6. Evaluate feasible mitigation, including source controls, speaker orientation and limits, restrictions on event types and hours, limits on event frequency and duration, and other measures supported by the evidence.

7. Disclose residual impacts after mitigation and explain whether they would remain significant.

I31-40 (Cont.)

The Centers for Disease Control and Prevention's National Institute for Occupational Safety and Health has published information concerning noise exposure and hearing loss. That information provides useful background on sound exposure, but the District must conduct a site-specific analysis of the project's environmental effects rather than rely on general decibel examples.

Reference:
https://archive.cdc.gov/www_cdc_gov/niosh/newsroom/feature/hearingloss.html

VI. The Visual Impact Analysis Must Include Parkway Views and Permanent Structures, Even When Lights Are Off

I31-41

The Draft EIR's visual analysis does not adequately capture the permanent alteration of the setting that Parkway users and neighboring residents will experience.

The proposed project would introduce or expand prominent human-made features, including four 80-foot light masts, an elevated press box, enlarged bleachers, and additional lighting and associated infrastructure. These features would change the visual relationship between the school and the adjacent natural landscape.

The visual effects are not limited to illuminated fixtures at night. The physical presence of tall masts, elevated structures, and expanded seating can be visible during daylight and when all stadium lighting is switched off.

The levee and existing tree cover do not necessarily obscure the proposed structures from all viewpoints. Views from the river side of the levee, paved and unpaved trails, elevated portions of the levee, and locations east and west of the stadium must be assessed directly.

The Draft EIR must also accurately characterize the relationship between the project and the Parkway boundary. Where the analysis relies on an assertion that particular viewing locations are outside the Parkway or that the levee screens the project, the District should provide maps, photographs, and supporting evidence that allow the public to verify those assertions.

The analysis must account for the experience of people walking, cycling, sitting on benches, observing wildlife, and using the levee and adjacent trails. It should include people with limited mobility who may spend time in particular accessible locations rather than moving quickly through the area.

The issue is not simply whether the structures are architecturally attractive or visible from a particular property. It is whether their scale, prominence, and permanence would materially alter the natural visual setting and the experience of a protected river corridor.

I31-41 (Cont.)

Required action

The Final EIR must:

1. Establish accurate project and Parkway boundaries using reliable mapping.
2. Identify and justify representative key observation points, including viewpoints from the Parkway side of the levee and from trails and accessible public locations.
3. Provide existing-condition photographs and simulations of the completed project from those viewpoints.
4. Show the full proposed structures, including the 80-foot masts, press box, bleachers, fences, and additional lighting, at appropriate scale.
5. Evaluate daytime views, nighttime views with lights operating, and views when stadium lighting is off.
6. Assess the cumulative visual effect of the stadium and other reasonably foreseeable development adjacent to the Parkway.
7. Explain the significance determination and identify feasible mitigation for visual impacts.

The District must not equate the absence of illumination with the absence of a visual impact, or the presence of trees with effective screening without demonstrating that conclusion through site-specific evidence.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-42

VII. Biological Resources, Wildlife, and Habitat Must Be Evaluated in Relation to Actual Stadium Operations

The Parkway contains valuable riparian and aquatic habitats and supports a diversity of wildlife. The proximity of the proposed stadium to these resources makes it necessary to evaluate both direct and indirect effects arising from the project's construction and operation.

The Draft EIR must adequately consider the effects of recurring noise, artificial lighting, increased human activity, event-related movement, and the cumulative presence of other facilities and activities on relevant biological resources.

I31-43

The analysis should consider potentially affected birds, nesting and rearing areas, aquatic and riparian wildlife, and other species and habitats identified by qualified biological review. It should not assume that impacts are absent simply because the stadium footprint does not directly overlap a particular habitat area.

Potential indirect effects require appropriate investigation, including disturbance during sensitive periods, effects of nighttime lighting where relevant, changes in wildlife behavior, and the combined consequences of repeated events.

The District must identify the biological surveys and technical reports supporting its conclusions, including survey dates, survey areas, methods, qualifications of the personnel involved, relevant seasonal limitations, and the basis for identifying sensitive receptors.

The EIR should distinguish impacts supported by site-specific findings from general assumptions about how wildlife is likely to respond.

I31-44

Required action

The Final EIR must:

- Provide or incorporate complete, accessible biological studies supporting the impact analysis.
- Identify sensitive habitats and relevant wildlife receptors within the area of potential influence, not merely within the construction footprint.
- Assess foreseeable operational effects of noise, lighting, human activity, and event frequency.
- Evaluate cumulative impacts in conjunction with other existing and reasonably foreseeable activities and development.
- Identify feasible mitigation and monitoring measures with measurable performance standards, defined responsibilities, and corrective actions.
- Explain the significance of residual impacts after mitigation.

The District must make the supporting technical reports available for meaningful public review. References to portals or databases that require the reader to locate an unspecified record do not provide the same transparency as identifying the actual report, data, and analysis relied upon.

Please make sure the Final EIR addresses and evaluates these concerns and revisits the proposed mitigations.

I31-45

VIII. The District Must Assess Displacement, Crowding, and Effects on Other Recreational Areas I31-46

The Draft EIR does not adequately address the possibility that deterioration in the quality of the recreational experience near the stadium could cause some Parkway users to relocate their activities to other portions of the Parkway, nearby parks, or other open spaces.

People seeking quiet recreation, wildlife observation, or an opportunity to escape noise may choose to leave an affected location when repeated stadium activity makes that experience less available. Others may adjust their schedules, abandon particular locations, or travel elsewhere.

Such changes are reasonably foreseeable questions for environmental review, even if the precise number of displaced users cannot be known in advance.

Potential displacement may affect crowding, access, parking, trail use, and the quality of recreational opportunities in other locations. The District must examine whether the project's effects could shift pressure to other areas and whether that shift could create additional environmental consequences.

The analysis must not presume that people can simply move elsewhere without consequence. The availability of another park does not automatically replace the ecological setting, accessibility, proximity, recreational experience, or particular benefits of the affected location.

This is especially important for people with disabilities or mobility limitations, people who rely on nearby accessible recreational opportunities, and those for whom travel to another location may be difficult.

Required action I31-47

The Final EIR should identify the available evidence regarding current use, sensitive recreational locations, anticipated changes in use, and the likelihood of displacement. Where reliable quantitative estimates are unavailable, the District should provide a transparent qualitative assessment and explain its assumptions and limitations.

It should evaluate foreseeable effects on nearby recreational facilities and other portions of the Parkway, including potential changes in crowding, noise exposure, and access, and identify feasible measures to avoid or reduce those effects.

IX. Cumulative Impacts Must Include Other Campus Facilities and Reasonably Foreseeable Development I31-48

The stadium must not be evaluated in isolation from the broader campus and surrounding area.

The Rio Americano campus Master Planning materials appear to identify additional facilities or changes that could affect the Parkway, including potential relocation of tennis courts toward the Parkway, modernization of the pool facility, and a proposed cell tower adjacent to the corridor. The status, scope, timing, and approval status of these elements must be verified and accurately described in the environmental analysis.

The District must also address the use of other athletic fields, including any existing or reasonably foreseeable use of temporary lighting, where those activities may combine with stadium operations to increase noise, light, traffic, attendance, or visual intrusion.

Cumulative analysis must consider the relevant effects of past, present, and probable future projects and activities as required by CEQA. The District should explain which projects and activities are included, why they are relevant, and how their effects may interact with the proposed stadium.

The analysis must not artificially separate individual projects or operating activities when their combined effects could affect the same receptors.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-48 (Cont.)

Required action

The Final EIR must:

1. Identify relevant existing and reasonably foreseeable projects and activities on campus and in the surrounding area.
2. Verify the status of facilities shown in applicable campus planning documents.
3. Evaluate cumulative noise, lighting, visual, biological, recreational, traffic, and public-safety effects where relevant.
4. Consider simultaneous or overlapping uses of the stadium and other campus facilities.
5. Explain whether the combined effects could be significant and identify feasible mitigation within the District's authority.

The cumulative analysis should be supported by maps, schedules, technical reports, and other information sufficient for the public to understand the scope and conclusions.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-49

X. The Project Description Must Disclose the Full Range of Non-School Events and Rentals

I31-50

The Draft EIR must clearly define whether and how the stadium may be used for events that are not part of the school's regular educational and athletic program.

If non-school events or rentals are contemplated, the EIR must disclose their anticipated nature and reasonably foreseeable environmental consequences. It should not leave the public to guess whether uses such as concerts, tournaments, community events, or other amplified gatherings could be allowed.

Where the District has not committed to limiting the types of events, the environmental review must address the range of reasonably foreseeable uses enabled by the project and applicable operational arrangements.

The District should distinguish between events that are specifically proposed, events that are reasonably foreseeable under the proposed operating model, and events that would require separate approvals or project changes.

Required action

The Final EIR must provide a clear description of permitted and anticipated event types, anticipated frequency and duration, attendance assumptions, sound and lighting arrangements, operating hours, and relevant campus interactions.

If the District intends to exclude certain uses or impose operational restrictions, those restrictions should be stated explicitly and incorporated into enforceable project conditions or other binding commitments before project approval.

The District must not rely on discretionary future decisions or generalized assurances to avoid analyzing uses that the proposed project is intended to accommodate.

Please make sure the Final EIR addresses and evaluates these concerns.

XI. Public Safety, Emergency Planning, and Event Management Require a Clearer Analysis

I31-51

The substantial increase in stadium seating and potential attendance raises questions about occupancy management, circulation, access, emergency response, evacuation, and the coordination of simultaneous campus activities.

These questions are especially important where the school is adjacent to the Parkway and where attendees may use surrounding streets, parking areas, or public access routes.

The Final EIR must accurately describe the anticipated maximum occupancy, the assumptions underlying crowd estimates, and the procedures and infrastructure necessary to manage events safely.

It should address relevant emergency scenarios, including fire, flood, severe weather, power failure, medical emergencies, and security incidents, as appropriate to the site and proposed operations.

The analysis should explain the respective roles of the District, event organizers, emergency services, and other responsible agencies. It should not leave critical questions unanswered by assuming that another agency will determine or manage every aspect of an emergency after the project is approved.

Required action

The District should provide a clear account of the event-management framework, including applicable occupancy controls, access and circulation arrangements, emergency communication, evacuation procedures, coordination with responding agencies, and responsibility for implementation.

The EIR should also identify any public safety impacts that require mitigation under CEQA and explain how the proposed measures would function during large or simultaneous events.

The District must identify the applicable safety requirements and the mechanisms by which compliance will be achieved. General statements that the school or event organizers will follow applicable requirements are not a substitute for describing the project and adequately analyzing its foreseeable effects.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-51 (Cont.)

XII. The Draft EIR Must Provide Accessible, Verifiable Supporting Evidence

The public cannot meaningfully evaluate an environmental document if its underlying assumptions, source materials, and technical analyses are missing, contradictory, inaccessible, or inadequately identified.

The Draft EIR contains references that appear inconsistent or difficult to verify, and some cited materials reportedly direct readers to general portals rather than to the actual reports or records used to support the analysis. The District should audit these references and correct any broken, incomplete, or misleading citations.

The same applies to conflicting statements concerning capacity, attendance, operating assumptions, project boundaries, and the expected extent of impacts.

I31-52

A reader should not have to infer which of several figures is correct, guess which database entry the consultant relied upon, or reconstruct the methodology used to reach an environmental conclusion.

I31-52 (Cont.)

Required action

The Final EIR must:

- Correct broken or incomplete references and identify the exact source documents relied upon.
- Provide accessible copies of technical studies, relevant data, modeling outputs, maps, photographs, and other supporting materials, subject to applicable legal protections.
- Explain study methods, assumptions, criteria, measurement locations, and analytical limitations.
- Reconcile conflicting statements and figures throughout the document.
- Identify the evidence supporting each significance determination.
- Respond individually and substantively to comments raising these deficiencies.

Where new information or analysis is needed, the District should conduct the necessary studies rather than simply restate the original conclusions.

If revisions or new information constitute significant new information under CEQA, the District must comply with the applicable requirements for recirculation before certification.

Please make sure the Final EIR addresses and evaluates these concerns.

XIII. Mitigation Must Be Specific, Measurable, Enforceable, and Effective

I31-53

The Draft EIR does not adequately establish how the District will prevent or reduce the foreseeable impacts of the stadium's intended operations.

General assurances, statements of anticipated behavior, and vague commitments to manage events are insufficient where the project could generate recurring impacts over many years.

If the District intends to rely on operating restrictions to reduce environmental impacts, those restrictions must be sufficiently specific to be evaluated in the EIR and enforceable after project approval.

For example, a statement that the stadium is not expected to be used before sunrise does not establish an enforceable restriction unless the District commits to a defined operating limit and a means of ensuring compliance.

Similarly, statements that sound will be controlled do not establish an adequate mitigation measure without identifying the applicable limits, monitoring approach, responsible party, and corrective action.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-54

The Final EIR should evaluate and, where appropriate, commit to:

1. Maximum stadium occupancy and total campus attendance limits.
2. Defined operating hours and restrictions on event duration.
3. Limits on event frequency and simultaneous activities.
4. Restrictions on the types of non-school events permitted.
5. Enforceable amplified sound limits and appropriate monitoring locations.
6. Controls on band rehearsals, sound checks, public-address systems, and other recurring sources.
7. Lighting controls, including limits on spill, glare, duration, and unnecessary illumination.
8. Measures to avoid or reduce disturbance to sensitive biological resources.
9. Event access, circulation, crowd management, and emergency procedures.
10. A public-facing complaint and response process with defined response times and corrective actions.
11. Compliance monitoring, reporting, and consequences for violations.
12. Periodic review of actual operations and the effectiveness of mitigation.

These measures should include objective standards and identify who is responsible for implementing, monitoring, and enforcing them.

Where an impact cannot feasibly be reduced below a level of significance, the EIR must disclose that conclusion and address the applicable CEQA requirements rather than implying that an undefined future management process will resolve the problem.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-55

XIV. The Project's Benefits Must Be Considered Through a Complete and Honest Environmental Review

I31-56

I recognize the value of school athletics and the importance of providing students with opportunities to participate in sports, build skills, and develop a sense of community. Those benefits, however, do not eliminate the District's obligation to understand and disclose the environmental consequences of the proposed project.

The relevant question is not whether students should have access to athletic facilities. It is whether the proposed scale, location, infrastructure, frequency of use, and operating model have been adequately studied and justified in light of their foreseeable effects.

The District must consider feasible alternatives and mitigation as required by CEQA. That consideration should be informed by a complete understanding of the project's actual purpose and operational needs, not by an assumption that the proposed configuration is the only practical way to meet them.

The analysis should consider whether the project's objectives could be achieved with a smaller facility, fewer or lower structures, different lighting arrangements, more restrictive operating conditions, fewer non-school events, or other feasible measures that would reduce impacts on the Parkway.

The Draft EIR should also explain the basis for the proposed scale and capacity, including the demonstrated need for the planned increase in seating and the expected demand for school and non-school use.

A proper environmental review enables the District and the public to understand the consequences of the proposed project and make an informed decision. It does not predetermine that a preferred project must be approved regardless of the extent of its impacts.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-56 (Cont.)

XV. The District Must Recognize the Irreplaceable Public Value of the Lower American River Parkway

The Lower American River Parkway is more than a backdrop to nearby development. It is a shared natural and recreational resource whose value includes wildlife habitat, ecological connectivity, outdoor education, physical activity, and opportunities for people to experience quiet and calm in a natural setting.

I work with students interested in the Lower American River and Parkway, including students from Rio Americano. Through these experiences, I help students explore their interests, develop skills, learn about the environment, and understand their responsibilities as members of a community that shares and depends upon natural resources.

I31-57

Students are often quick to recognize that protecting the environment requires looking beyond immediate convenience and considering the long-term consequences of decisions. Students who enjoy sports can also recognize the value of preserving places where wildlife thrives and people can experience nature.

Some Rio Americano students, considering the proposed stadium and its intended scale and use, have shared on their own volition that they see no positive environmental outcome from the project. Their wisdom is thinking beyond themselves, and short term wants and convenience, understanding the greater stakes to the Parkway they enjoy, value, and use, too.

The District has an opportunity to demonstrate leadership by ensuring that school improvements are evaluated with the highest level of stewardship, transparency, and responsibility required – particularly one affecting a protected public resource of the Wild & Scenic Lower American River Parkway.

The people who use the Parkway cannot simply relocate the river, its habitat, or the natural setting that draws them there. Nor can they necessarily reproduce the same experience elsewhere, particularly if other areas become more crowded or experience additional pressure.

The District should therefore give serious consideration to feasible ways of meeting legitimate educational objectives while avoiding or reducing unnecessary and potentially significant impacts on this irreplaceable resource.

Please make sure the Final EIR addresses and evaluates these concerns.

I31-57 (Cont.)

XVI. Requested Corrections and Actions Before Certification of the Final EIR

For the reasons set forth above, I request that the District take the following actions before certifying the EIR and approving the project:

1. Correct the project description. Clearly define the stadium's maximum occupancy, total campus capacity, permitted activities, anticipated operating schedule, event frequency, non-school uses, and enforceable restrictions.

2. Reevaluate the recreation analysis. Reconsider the conclusion of “no impact on recreationists within the Parkway” on pages 5.13-33 through 5.13-34 and provide a complete assessment of direct, indirect, and cumulative effects on Parkway users.

3. Expand the receptor analysis. Include people engaged in quiet recreation, nature observation, education, exercise, fishing, paddling, and other Parkway activities, as well as nearby residents, sensitive biological resources, and other affected receptors.

4. Conduct an adequate operational noise study. Evaluate realistic and reasonably foreseeable event conditions, daytime and nighttime use, crowd and amplified sound,

I31-58

simultaneous activities, sound propagation, and repeated exposure at representative Parkway and residential locations.

5. Correct and expand the visual analysis. Include representative viewpoints from the Parkway and levee, demonstrate the visibility of all major structures, evaluate daytime and nighttime conditions, and address permanent visual effects even when lighting is off.

6. Complete the biological analysis. Evaluate operational disturbance, artificial lighting, relevant sensitive habitats and wildlife, and cumulative effects, supported by complete and accessible technical studies.

7. Analyze displacement and cumulative recreational effects. Assess foreseeable changes in recreational experience, potential displacement, and additional pressure on other portions of the Parkway and nearby open spaces.

8. Analyze the full range of school and non-school operations. Identify anticipated and reasonably foreseeable event types, occupancy, duration, frequency, and associated impacts. Establish binding restrictions where the District intends to rely on them to reduce impacts.

I31-58 (Cont.)

9. Expand the cumulative analysis. Evaluate the combined effects of relevant campus facilities, other athletic fields, potential future development, and reasonably foreseeable activities affecting the same receptors.

This includes other planned project at Rio Americano campus – such as Cell tower, multiple new tennis courts and the corresponding facilities intended to replace quiet classrooms at boundary of the Parkway, modernization and replacement of competition practice pool and its facilities and use impacts. And a proposed government project which will remove miles of habitat near Rio Americano – being legally challenged now by and on behalf of the public in court now to save some portion of this unique and rare habitat, wildlife, and natural recreational spaces we are so fortunate to have – that otherwise will remove at 3.5 miles of vegetation and over 700 trees just adjacent Rio Americano.

Please also consider these impacts and the added cumulative pressure on wildlife, people, the Parkway this will result in.

I31-59

A simple walk on the parkway at south and southeast boundary of Rio Americano, and you can easily see multiple and expansive areas that have site lines that will see upper portion of walkway lighting, estimate at least 50 – 60 feet of poles and light masts for stadium lighting, likely the elevated bleachers, and press box (but rendering and designs are so poor and misrepresentative those should be replaced and actual design documents provided for DEIR and Final EIR.

I31-60

As a parkway user I can attest, I do not want to be subjected and forced to see and experience these visual intrusions and noise on the parkway, quiet trails, while paddling on the river, walking, sitting, nature viewing – but that is what this project would result in.

I31-60 (Cont.)

I took pictures of number of places where you see the goals posts from paved bike trail, unpaved trails, from mitigation planting area, from unpaved trails west and east and behind the stadium. I also saw light posts, and at times fixtures atop one-story buildings. Please expand your study area and provide much wider increments of key observation points where this will be visible – in order to adequately understand impact. And from the levee crown – the site lines are even more expansive, and trees do not cover much of this. It will be hard to escape even the simplest of safety lighting impacts – even below the levee, from unpaved trails and make preservation and protection of this rare riparian habitat, places for wildlife and people to

10. Strengthen public safety and event-management analysis. Clarify occupancy management, emergency planning, event circulation, responsibilities, and relevant mitigation.

11. Make the supporting evidence accessible. Correct broken or incomplete references and provide the actual technical reports, data, assumptions, maps, and other materials necessary for independent public review.

12. Establish enforceable mitigation. Include measurable standards, monitoring, reporting, assigned responsibilities, and corrective actions for noise, event operations, biological disturbance, and other identified impacts.

I31-61

13. Provide substantive responses to these comments. Address each issue directly, with references to the relevant evidence and analysis. Where the Draft EIR's assumptions are unsupported, its data conflict, or its scope is inadequate, correct the underlying deficiency rather than merely restating the original conclusion.

I31-62

14. Revise and recirculate the Draft EIR if required by CEQA. If the additional analysis or information reveals significant new information meeting CEQA's recirculation standard, provide the public with the required opportunity to review and comment before certification.

I31-63

Conclusion

The proposed Rio Americano High School Stadium Improvements Project is a discretionary project that will overwhelm the parkway and have numerous avoidable and significant impacts. These will substantially change the experience, value, benefits, and use of the Wild & Scenic Lower American River Parkway for thousands, for wildlife, and the rare and extraordinary habitat beyond the school property.

I31-64

The District must evaluate the stadium as it is intended and reasonably foreseeable to operate at its proposed capacity, with its permanent structures, across the anticipated range of events and operating hours, and in combination with other activities and development.

The Draft EIR's conclusion that the project would have no impact on Parkway recreationists or the parkway is not adequately supported by the analysis presented. The District must reconsider that conclusion, expand the scope of its studies, establish the actual extent of potential impacts, and disclose the consequences for the public, neighboring communities, wildlife, habitat, and the Parkway itself.

Please make sure the Final EIR addresses and evaluates these concerns.

A complete EIR is essential not only for legal compliance but also for responsible public decision making. The community deserves an environmental review that presents the actual project, the full range of its reasonably foreseeable impacts, evidence supporting its conclusions, and the measures that will genuinely be implemented to avoid or reduce harm.

I31-65

I urge the District to approach this decision as an opportunity to demonstrate stewardship of the Lower American River Parkway. The needs of students and the long-term protection of the Parkway, parkway users, neighbors, community, and public should be considered honestly and comprehensively, with due regard for the thousands of people who rely on this resource and for the wildlife and natural systems that make it extraordinary.

The Parkway's peace, natural character, accessibility, and ecological value are not expendable simply because an adjacent facility can be made larger or used more intensively. The District must fully evaluate what would be lost, what can feasibly be protected, and whether the proposed project is justified in light of its complete environmental consequences.

I31-66

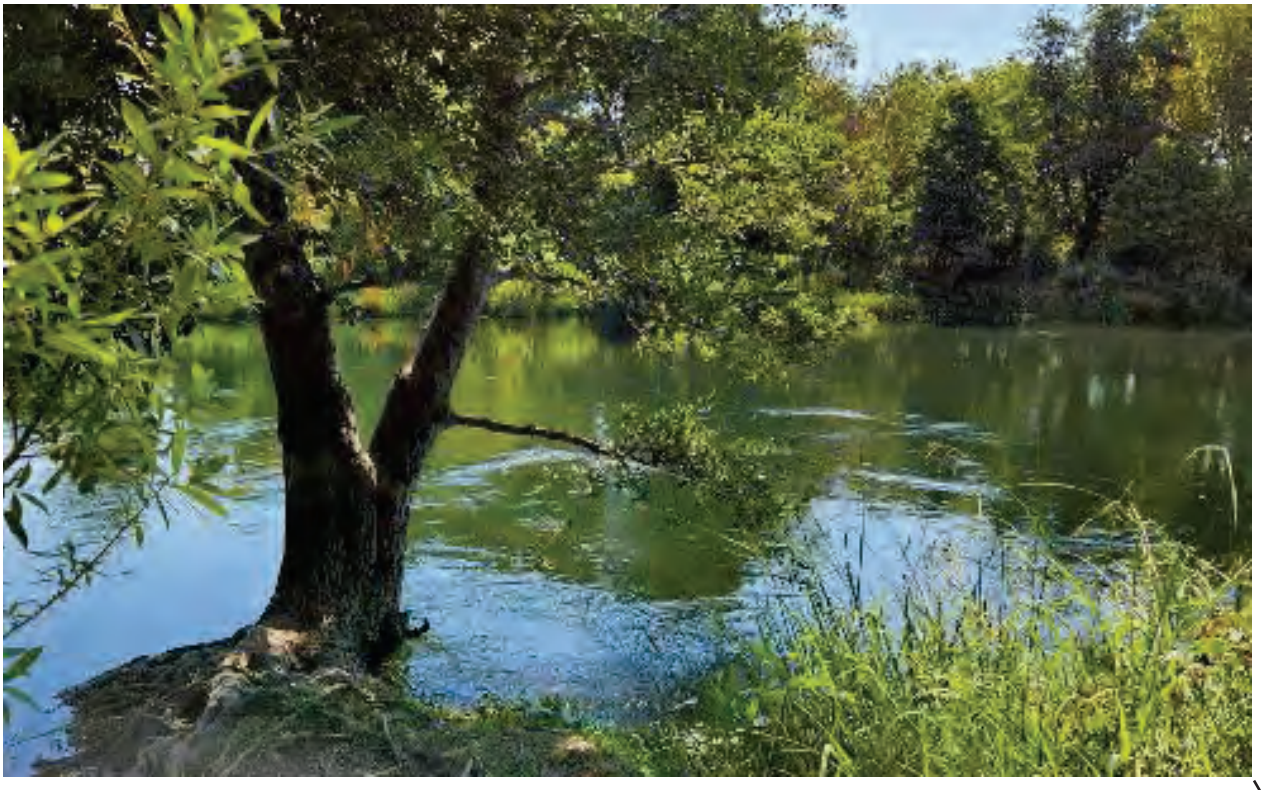
Here are just some of many favorite quiet spots on the amazing federal and state designated Wild & Scenic Designated Lower American River and Parkway meant to be conserved for all of us - that will have significant impacts from the intended operation of the planned stadium and use, and cumulative impacts that will come with it:

I31-67



I31-67
(Cont.)









I31-67
(Cont.)

Thank you for your consideration. Please include my comments in the administrative record and that the Final EIR.

I31-67
(Cont.)

Thank you

Julie Gabele
Sacramento, CA

Letter I32

From: Barbara Gardner
To: mbassanelli@sanjuan.edu; Rio Americano; nicholas.arps@sanjuan.edu

Subject: Concerns about proposed new stadium construction at Rio Americano High School
Date: Wednesday, October 14, 2026 11:56:15 PM

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Report Suspicious

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.

To whom it may concern,

Although I did not personally write the text of this following letter I agree with it and I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I32-1 I32-2 I32-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I32-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I32-5

Where the DEIR falls short: I32-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I32-7

Incomplete Environmental Baseline and Project Description – I32-8

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions. I32-8 (Cont.)
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I32-9
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I32-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I32-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I32-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I32-13

Thank you for your consideration,

Barbara Gardner

2870 Azalea Rd.

Sacramento, CA 95864

sent from my iPad

Letter I33

From:	Margaret Goerig
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Friday, October 16, 2026 5:44:54 PM

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To whom it may concern,

I'm writing as a concerned citizen in the Sacramento area. The American River is truly my favorite thing about living here and I am extremely disheartened by this project. For a school that has named itself after the river, it seems you should be more concerned about the river than this project suggests that you are. Please read the remainder of my concerns below. I33-1

The intended stadium construction at Rio Americano High School includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I33-2 I33-3 I33-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I33-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I33-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I33-7

Incomplete Environmental Baseline and Project Description – I33-8

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I33-9
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I33-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I33-11
Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I33-12
Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I33-13

Thank you for your consideration,

Maggie

Letter I34

From: rowenaegray
To: Rio Americano
Subject: Rio EIR
Date: Sunday, October 11, 2026 10:44:47 PM

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To whom it may concern:
As a local resident considering Rio for my future high schooler, I was disappointed to learn of the stadium project which channels money to something that will apparently be used 8 times per year by athletes of one gender. I will hold that comment for the school district. I34-1

For the environmental review, I did note some assumptions that didn't make sense. The traffic simulations assume a fraction of students walk or ride to school, but one of the stated reasons for the stadium project is that football games are held in August-September when it's very hot. It seems unlikely that students will be traveling to school and/or games on foot if it's >90 degrees on those days. I34-2 Similarly, the plan appears to be to hold games later in the evening to avoid the heat, but that seems to mean that students would finish school around 3:30pm and attend a game starting sometime after 7pm. There is nowhere walkable to the school to get something to eat so students would likely end up being ferried by car for dinner/snacks and back again, thus creating more traffic and defeating one of the stated purposes of not just holding these 8 games at the existing stadium <3 miles away at the other high school. I34-3 Another of the assumptions is that families will park in the Jesuit carpark-- this simply won't happen. People will not walk that far, especially in the heat that is envisaged (I live in between the 2 high schools and people rarely park in front of our house even for busy Jesuit games, so the notion that families will walk from Jesuit even further to Rio is unlikely). There was also no mechanism mentioned in the report to force people to park over there and walk to the games, so much more likely is parking on the streets. I34-4
The simulation seems to understate the likely traffic impact for these reasons-- if the project included building more parking on the campus, it would still be a waste of school district money but it would make more sense. I34-5

Many thanks for the opportunity to opine,
--
Rowena Gray, American River Drive.

Letter I35

From: Konstantin Grigoryan
To: Rio Americano
Subject: Public Comment in Support of the Rio Americano High School Stadium and Cell Tower Project
Date: Wednesday, October 14, 2026 5:51:43 PM

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To Whom It May Concern,

I am writing in support of the proposed stadium improvements and cell tower project at Rio Americano High School. I believe these improvements represent a valuable investment in our students, our schools, and the broader community. While I recognize the importance of evaluating potential environmental and neighborhood impacts, I believe these concerns should be addressed through thoughtful planning and appropriate mitigation rather than used as a basis for opposing the project altogether. I35-1

Investment in Students and the School Community I35-2

A modern stadium would provide Rio Americano students with improved facilities for athletics, physical education, school spirit, and community gatherings. High school athletics and extracurricular activities play an important role in students' development, fostering teamwork, discipline, resilience, leadership, and a sense of belonging. Students at Rio Americano deserve access to quality athletic facilities comparable to those available at other high schools in the district.

The proposed stadium would also create a dedicated venue for school events, reducing the need to rely on outside facilities and allowing the school community to come together on its own campus. Providing these opportunities is a legitimate educational and community benefit that deserves consideration alongside the project's potential impacts.

Compatibility with the American River Parkway I35-3

The proximity of the campus to the American River Parkway deserves careful consideration, but proximity alone does not establish that the proposed project is inappropriate. Schools and protected natural areas can coexist when facilities are designed and operated responsibly.

I support reasonable measures to minimize light spill, direct lighting away from sensitive habitat, limit unnecessary nighttime illumination, and manage event noise. These measures should be incorporated into the project wherever feasible. At the same time, the analysis should distinguish between temporary impacts associated with occasional school events and the permanent impacts of construction, using evidence-based assessments rather than assuming that all stadium use will result in unacceptable harm to the Parkway. I35-4

The Parkway is an important natural and recreational resource, and its protection should remain a priority. However, that priority need not be incompatible with improving existing school facilities on school property. A balanced approach can preserve the character of the Parkway while allowing students to benefit from modern educational and athletic infrastructure. I35-5

Noise, Lighting, Traffic, and Public Safety I35-6

Concerns about noise, lighting, parking, traffic, and emergency preparedness are legitimate planning considerations. They should be evaluated carefully, with appropriate mitigation measures incorporated into the final project. Potential measures include directional and shielded lighting, reasonable operating hours, sound-management practices, event staffing, traffic management, and a clearly documented emergency and evacuation plan.

However, the identification of an impact in an environmental review does not, by itself, mean that a project should not proceed. The relevant question is whether the project's benefits justify its impacts and whether those impacts can be reduced to an acceptable level through enforceable measures and responsible operations.

I encourage the District to work constructively with neighbors, public agencies, and Parkway stakeholders to address these concerns. Where mitigation is warranted, it should be practical, measurable, and consistent with applicable regulations. This approach would allow the District to protect public safety and environmental resources without unnecessarily depriving students of needed facilities.

Cell Tower and Communications Infrastructure I35-7

I also support consideration of the proposed cell tower as part of the overall campus improvement effort. Reliable wireless communications infrastructure is increasingly important for students, staff, families, and the surrounding community. Improved cellular coverage can support everyday communication and provide an additional means of contacting emergency services, although it should not be treated as a substitute for dedicated school emergency communications and evacuation systems.

The tower should be evaluated transparently, including its relationship to the stadium project and any applicable environmental, land-use, and safety requirements. If the tower and stadium are sufficiently related to warrant cumulative-impact analysis, that analysis should be completed as required. Doing so would strengthen the environmental review and provide the public with a more complete understanding of the project.

I35-7 (Cont.)

Conclusion

I encourage the District and the reviewing agencies to consider the full range of benefits associated with the proposed stadium and cell tower, including improved student opportunities, equitable access to athletic facilities, stronger school-community connections, and enhanced communications infrastructure.

Environmental stewardship and educational investment are not mutually exclusive. With thoughtful design, appropriate mitigation, transparent operating standards, and meaningful attention to public safety, Rio Americano High School can improve its facilities while respecting the surrounding neighborhood and the American River Parkway.

I respectfully urge the District and the reviewing agencies to move this project forward, incorporating reasonable and enforceable mitigation measures where necessary, and to give due weight to the long-term educational and community benefits it would provide.

I35-8

Thank you for considering my comments.

Sincerely,

Konstantin Grigoryan

Neighbor to Rio Americano high school and A Supporter of the Rio Americano High School Stadium and Cell Tower Project

Letter I36

From: Liyan Yu
To: nicholas.arps@sanjuan.edu; Rio Americano; McFerran, Suzanne; info@sanjuan.edu; mbassanelli@sanjuan.edu; boardmembers@sanjuan.edu; nroux@sanjuan.edu; trent.allen@sanjuan.edu; fhanysha.gaddis@sanjuan.edu; frank.camarda@sanjuan.edu; raj.rai@sanjuan.edu; Construction
Subject: SJUSD, Rio Americano High School Stadium Proposal DEIR,SCH 2026010094, Public Comment

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Date: Wednesday, October 14, 2026 2:57:48 PM

Public Comment submitter Via Email

Nicholas.arps@sanjuan.edu, Suzanne.McFerran@aecom.com, info@sanjuan.edu, mbassanelli@sanjuan.edu, boardmembers@sanjuan.edu, nroux@sanjuan.edu, trent.allen@sanjuan.edu, fhanysha.gaddis@sanjuan.edu, frank.camarda@sanjuan.edu, raj.rai@sanjuan.edu, construction@sanjuan.edu, rioEIR@aecom.com

Please email confirm that you receive my DEIR Public Comment

October 14, 2026

To: San Juan Unified School District From: Liyan Grimm

Re: SJUSD, Rio Americano High School Stadium Proposal DEIR, SCH 2026010094--Public Comment

Dear San Juan Unified School District Board Members and Environmental Review Team,

We write as a longtime residents of the Sacramento community to express my serious concerns regarding the proposed Rio Americano High School Sports and Events Stadium Project and the adequacy of its Draft Environmental Impact Report (DEIR). I36-1

We strongly support quality education, student athletics, and opportunities for young people to develop their talents. However, we believe that expanding the existing 288-seat bleachers to a 2,575-seat stadium, with substantial lighting, amplified sound, and increased event activity, raises serious environmental and community concerns that must be fully addressed before any project approval.

1.Traffic Congestion, Parking, and Neighborhood Safety

A stadium of this size could substantially increase traffic on surrounding residential streets, especially during evening events and large gatherings. We are particularly concerned about traffic congestion, pedestrian safety, emergency vehicle access, and overflow parking in nearby neighborhoods. I36-2

The DEIR should evaluate realistic maximum-attendance scenarios, including overlapping school and community events, rather than relying only on typical operating conditions. The District should provide a detailed, enforceable traffic and parking management plan, including adequate on-site parking, secured off-site parking arrangements, and protections for residential streets. I36-3

We live very near Rio Americano High School. In front of my home, we deal with illegal parking almost daily as Rio students come to and leave school. During student dismissal, many vehicles are often parked along both sides of the streets near Whitehall Way and across from my home. My house is at a corner. Rio High School is very close. Although the vehicles do not always block my driveway, the narrow space makes it difficult to turn from Whitehall Way into my garage, which requires a sharp, approximately 90-degree turn. At times we feel it is unsafe to turn in, and we have to wait outside until traffic and parking conditions ease. This happens frequently around dismissal times. (See 2 photos attached.) I36-4

On one occasion, a vehicle was parked directly in front of my driveway exit and prevented me from leaving. We waited more than two hours for the vehicle to be removed and arrived late to a commitment. The vehicle was eventually towed.

During larger games, we have also seen heavy parking along both sides of American River Drive near Rio Americano High School. A “No Parking Any Time” sign is posted in front of my home, but vehicles regularly park in the signed no-parking area. This makes it difficult to see whether it is safe to turn and affects residents using this intersection.

I36-4 (Cont.)

The parking congestion and limited visibility also make it harder for residents to leave promptly in an emergency. We ask the District to evaluate parking management, sight distance, and residential access during dismissal and game events, and to explain how it will keep the signed no-parking area clear and reduce the risk of traffic concerns.

I36-5

2.Noise Pollution and Quality of Life

The DEIR identifies event noise as a significant and unavoidable impact even after mitigation. This is a serious concern for residents who value the peace and quiet of their neighborhoods and for wildlife within the American River Parkway. Amplified announcements, cheering crowds, music, and increased evening activities could permanently change the character of this residential and natural environment. We request that the District evaluate less intensive alternatives, establish enforceable limits on event frequency and hours, and explain how the project will comply with applicable noise standards.

I36-6

3.Stadium Lighting and Nighttime Environmental Impacts

The proposed 80-foot lighting structures raise concerns about glare, skyglow, light trespass, and impacts on surrounding homes and natural habitats. The American River Parkway is an important ecological and recreational resource that deserves special protection. The Final EIR should provide clear, enforceable lighting specifications, evaluate impacts under maximum operating conditions, and require the strongest feasible DarkSky-oriented lighting protections.

I36-7

4. Wildlife and American River Parkway Protection

The American River Parkway provides habitat for birds, bats, and other wildlife, as well as a peaceful natural environment for residents throughout the Sacramento region. The DEIR should thoroughly evaluate not only construction-related impacts but also the long-term effects of repeated nighttime events, artificial lighting, amplified noise, and increased human activity. The analysis should also consider cumulative impacts from nearby recreational developments and the proposed or approved 90-foot cell tower.

I36-8

I36-9

5. Public Safety and Emergency Preparedness

Large gatherings require careful planning for emergencies, evacuation, security, pedestrian circulation, and access for police, fire, and medical responders. We request that the District provide specific, enforceable safety and emergency management measures appropriate for maximum stadium attendance. These measures should be clearly established before project approval rather than left to future discretionary decisions.

I36-10

6. Educational Priorities, Responsible Investment, and Less Environmentally Damaging Alternatives

The primary mission of a public high school is education. While athletics are an important part of student development, they should not overshadow the equally important needs of academic instruction, science laboratories, performing arts, music, and other educational programs. We strongly question the District’s decision to prioritize a large-scale sports and events stadium at a location immediately adjacent to the environmentally sensitive American River Parkway.

Before committing substantial public resources to this project, the District should clearly explain how the proposed investment compares with the school’s existing academic and

I36-11

arts facility needs, what funding restrictions apply, and whether alternative investments could provide broader educational benefits to students. A successful high school should be measured not by the size of its stadium, but by the quality and diversity of educational opportunities it provides.

I36-11 (Cont.)

Furthermore, the District should seriously evaluate smaller-scale athletic improvements and alternative locations or designs that could meet legitimate student needs without creating the same level of noise, lighting, traffic, and environmental impacts. Public education, environmental stewardship, and neighborhood well-being should not be treated as competing priorities. Responsible planning should protect all three.

I36-12

7. Incomplete Project Description and Enforceable Mitigation

The environmental review should clearly define the maximum number of events, anticipated attendance, operating hours, lighting use, amplified sound, staffing, security, and parking arrangements. Without these details, the public cannot adequately understand the full environmental consequences of the project. we request that the Final EIR address these uncertainties and include enforceable mitigation measures rather than relying on general assurances or future plans.

I36-13

Conclusion

We respectfully request that the District fully address these concerns, provide a complete and transparent environmental analysis, and seriously consider smaller-scale or less environmentally damaging alternatives before proceeding. I am not opposed to student athletics. I am opposed to approving a project of this magnitude without adequately protecting surrounding neighborhoods, public safety, and the irreplaceable American River Parkway.

I36-14

Please include this letter and photos in the official public comment record for the Draft Environmental Impact Report, make part of the administrative record, and provide written responses to the issues raised. Thank you for your consideration.

I36-15

Sincerely, Liyan and Greg Grimm



I36-4 (Cont.)



I36-4
(Cont.)

Letter I37

From:	William Grissom
To:	Rio Americano
Subject:	Draft Environmental Impact Report (EIR) for Rio Americano High School's stadium improvement project
Date:	Wednesday, September 2, 2026 4:15:25 PM

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I saw nothing addressing speakers and sound levels, other than a mention of possible reduction due to proposed tree plantings if Alternative 2 were pursued. Even that did not discuss absolute sound levels. Also, how would the sound level be controlled? Would an Operator be able to just crank up the amplifiers, above a "designed level"? I37-1

Letter I38

From: William Grissom
To: Rio Americano
Subject: Comments on Draft EIR
Date: Tuesday, September 8, 2026 2:38:59 PM

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There is no mention of past agreements between the San Juan School District and the surrounding neighborhoods (East Wilhaggin and Del Dayo) concerning stadium design and use. I have been told by several residents that there was such an agreement, and even a lawsuit that halted the last pass at a Stadium remodel attempt to accomodate home football games, especially lighting and speakers (around 2015). I38-1

The document states that sound levels will be controlled by digital sound processing that operators will not be able to over-ride. More explanation of that is needed. I38-2

I am especially concerned since past promises by the district have not been honored. A notable one is a promise that the gate at the rear to the river would only be locked during school hours, yet it was locked almost every day during the Summer of 2025, and many other days on weekends. At a prior meeting, a SJ representative claimed that is untrue, but I am the one who has had to climb over the gate and watched many others do so. I38-3

William Grissom, 4561 American River Drive 95864.

Letter I39

From: Chart1217@comcast.net
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Saturday, October 17, 2026 9:29:03 AM

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Report Suspicious

To whom it may concern,

I love the American River Parkway and spend part of almost every day walking on the horse trail and enjoying the beauty and the wildlife that make it home as do so many others. I391

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I39-2 I39-3 I39-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I39-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I39-6

Where the DEIR falls short: I39-7

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I39-8
Incomplete Environmental Baseline and Project Description – I39-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I39-10
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I39-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I39-12
Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I39-13
Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I39-14

Thank you for your consideration,
Cary Hart

[name]

Letter I40

From:	Phyllis Hayes
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 3:42:12 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I40-1 I40-2 I403

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I40-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I40-5

I have further outlined my concerns about the project and the DEIR below. I40-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I40-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I40-8

Incomplete Environmental Baseline and Project Description – I40-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I40-10 I40-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I40-12

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Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I40-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I40-15

Thank you for your consideration,

[name]

Letter I41

From:	Candice Heinz
To:	Rio Americano; MBassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject:	RAHS Stadium Project DEIR Public Comment Submission
Date:	Thursday, October 15, 2026 11:12:50 PM
Attachments:	CHeinz_PublicComment_DEIR_RAHS_Stadium_101026.pdf

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Report Suspicious

Hello,

Please find attached my official public comment submission for Draft EIR for the Rio Americano High Stadium Project. Please include this in the final record. **Please confirm receipt**.

I41-1

Thanks!

Candice Heinz

To whom it may concern, 10/10/2026

I'm an Environmental Scientist and resident living adjacent to the American River Parkway on the south side of the river. As an avid user of the Parkway, I am deeply concerned about the impacts that a high-intensity sports and event stadium will have on the delicate ecosystem and recreational value of the Parkway. I have reviewed the Draft EIR in its entirety and have identified an abundance of critical deficiencies that must be addressed in the Final EIR. I41-2

Cumulative Analysis I41-3

The DEIR's cumulative analysis is not actually cumulative. Potential impacts of the project are addressed separately throughout the report and through various analyses rather than conducting a distinct cumulative analysis in which the impacts of simultaneous increases in noise, light, traffic, vibration, human activity, etc. are evaluated together. The perceived impact of increased noise+light+traffic+vibration+human activity on residents and wildlife must be adequately addressed in the FEIR.

The U.S. Army Corps of Engineers American River Common Features Project must be addressed in the FEIR as a cumulative project. The Contract 3B portion of the project has the potential to remove a substantial amount of available, suitable habitat in the area of Rio Americano High School—about 700 trees and miles of already dwindling habitat. In fact, Contract 2 downstream already removed a staggering amount of precious habitat in this federal and state designated Wild and Scenic River Act protected area. The DEIR states that "ample suitable foraging, roosting, and nesting habitat exists located in the surrounding neighborhoods and within riparian habitat to the south along the American River." However, the existing condition of "ample suitable habitat" in the Parkway on both sides of the river could be altered considerably depending on the judge's ruling in the current court case for the project. I41-4

Biological Resources I41-5

The biological resources impact assessment of the DEIR is exceedingly deficient. One of the most critical errors in the impact analysis is an apples-to-oranges comparison of daytime Parkway ambient conditions with projected evening game-time conditions. Nighttime ambient measurements, preferably multiple measurements at multiple locations, in the Parkway must be obtained. This would provide an accurate assessment of the true projected increase in noise levels that biological resources on the Parkway would be exposed to during stadium events.

Determinations of impact rely heavily on generalized, qualitative assumptions and judgement rather than scientific evidence. Once an accurate measurement of noise impact is obtained, quantitative studies that specifically evaluate wildlife noise thresholds or individual species

tolerances should be incorporated into any impact significance determinations. The FEIR must incorporate a more science-led approach.

I41-5 (Cont.)

As an example of qualitative assumptions/judgement, the DEIR states that "any species occupying developed areas in the project site would already be accustomed to the presence of night-time artificial lighting". However, any new lighting should be treated as cumulative to existing conditions. Wildlife may not be "accustomed" to the *increase* in lighting. Furthermore, this assumption does not appear to be backed by any scientific evidence. The FEIR must include scientific research about the impacts of artificial lighting, including cumulative artificial lighting, on wildlife.

I41-6

The DEIR impact assessment also qualitatively relies on the notion that wildlife would "relocate to avoid disturbances." This is unacceptable mitigation and there is no science presented regarding the impact of animals being forced to relocate and whether or not that relocation is harmful to species individuals, community functions, or the ecosystem. Furthermore, if wildlife avoids or is displaced from suitable habitat around the school as a result of stadium-generated light/noise/vibration/activity, this is a direct interference of resident wildlife movement within the corridor (Impact 4.2-4) and should be addressed as such in the FEIR.

I41-7

I41-8

Noise Analysis

I41-9

The noise analysis captures a daytime Parkway Lmax of 84 dBA (also noted as 78 dBA) and claims that the 73–87 dBA Lmax of game-time levels is "similar" to existing maximum conditions. Aside from the fact that these measurements cannot accurately be compared since they are not taken at the same time of day (as previously mentioned), the specific noise source(s) responsible for the 84 dBA measured maximum, including whether or not it represented a typical recurring noise event or an isolated transient event, was not explained. If such an outlier (compared to the Parkway 55 dBA Leq) occurred, another sampling event should have been conducted to ensure that the measured maximum used to determine impact significance was undoubtedly reflective of typical conditions on the Parkway.

I41-10

The evening predicted energy-average game-time noise level at the Parkway (59–72 dBA Leq) is compared with the daytime Parkway Leq of 55 dBA. One would expect a nighttime Parkway measurement to be even lower, but if the daytime measurement were to be used, this would mean that Parkway biological resources would experience an increase of 4-17 dBA. This is a substantial increase, yet the DEIR concludes that wildlife impacts would be less than significant. This conclusion is not backed by any scientific biological research that considers wildlife tolerance thresholds or the impacts that such an increase could have on individual species, community functions, or the ecosystem. The DEIR explains the human perception of increased noise but omits a wildlife receptor analysis. Using the DEIR's description of human perception, a 10 dB increase in noise levels is perceived as a "doubling of loudness". It's logical to assume that wildlife would

experience a similar or even more intensified exposure. If the result of the noise increase is wildlife relocation, this is still very much a potentially critical impact (as discussed in the previous section). The biological significance of the noise increase must be analyzed using specific scientific research in the FEIR's impact determination.

I41-1 (Cont.)

Light Analysis

I41-11

The temporary diesel lights currently on the field should not be used as part of baseline lighting conditions for any light-related impact analysis since they are not permanent components of the physical environment. The diesel lights should not have been brought to the school, as they create harmful emissions and noise pollution. A metaphor may explain this well: if a neighbor has been running a loud generator every evening, we wouldn't conclude that the neighborhood is already noisy enough to justify installing a permanent industrial generator. The existing disturbance is something to evaluate, *not a reason to normalize additional disturbance*. The FEIR must define baseline conditions as no field lighting, before the temporary lights were inadvertently brought in.

I41-12

The DEIR does not well describe light levels and associated impacts for each of the different types of events that the stadium would host. For example, the term "reduced illumination" is used without a definition. The FEIR must explain lighting levels explicitly, quantitively and include model lighting outputs for all possible event types, including football games, other games, meets, practices, graduations, or other events. Furthermore, the assumptions used for any existing or future light models must then be established as enforceable operational requirements/limits to ensure compliance with the modeled analysis for which the impact significance determinations were based.

Mitigation Measure 4.1-2 requires the stadium design to receive a DarkSky pass before construction, however, the FEIR must also require post-construction field measurements to verify that real lighting equipment/conditions correspond to the modeled values that DarkSky approved.

Vibration Analysis

I41-13

The DEIR's construction vibration analysis is a relatively simple, screening-level calculation using standard vibration estimates and distance attenuation, rather than a detailed site-specific ground-propagation model, which should be instead provided in the FEIR. Operational vibration is not analyzed quantitively in the DEIR at all and must be included in the FEIR.

Any potential impacts of construction and operational vibration on residents or biological resources, including ground-dwelling wildlife, insects, and vegetation root systems, must be assessed. If minimizing operational vibration impacts is reliant upon mitigation measures such as sound absorbing treatments on ramps or bleachers, the level of reduction capability should be quantified. Results should then be analyzed to determine if the reduction is significant enough to

mitigate impacts. The impact significance before and after mitigation must be included. Scientific research evaluating the impacts of construction and operational vibration on nearby residents, and biological resources—including vegetation—must be included in the FEIR.

I41-1 (Cont.)

Parkway Recreation

I41-14

The DEIR determines that Parkway recreational impacts would be less than significant. This determination relies primarily on the following factors. My comments are in italics.

a) The American River Parkway is closed to public use after sundown. – *The DEIR does not identify or evaluate any pre-dusk activities such as noise related to attendee arrival, pre-game announcements, team chanting, band warm-ups, equipment testing, etc. If games are starting as early as 7pm, it's very likely that recreationists will still be on the Parkway and even more likely that event-caused noise would occur up to an hour or more before kick-off. Furthermore, the time in which graduations and other stadium events would begin and end is not identified in the DEIR, and neither are its potential impacts on Parkway recreation.*
b) The flood-control levee separates the stadium from the Parkway. – *The levee does not provide significant protection for wildlife or recreationists. A large portion of people recreate using the levee crown trail, on which the impacts are greatest.*
c) "Stadium event parking would remain on school property, with no new vehicle access to the Parkway." – *This is stated in section 5.13 to justify "no potential for conflicts between event parking or school event traffic and recreationists within the Parkway", however, in section 4.4, the conservative scenario identifies an estimated parking deficit of approximately 296 spaces after occupation of approximately 327 nearby on-street spaces (off school property). Assuming most attendees arrive before kick-off (7pm) and well before dusk, conflicts with recreationists traveling to and from the Parkway would assuredly increase.*
d) The project would not physically alter Parkway recreational facilities. – *Potential impacts to wildlife, aesthetics, or anything that could temporarily or permanently degrade the scenic, biological, or recreational value of the Wild and Scenic Parkway should be considered in the FEIR's impact assessment of Parkway recreation, regardless of the time of day or physical location of the project's components.*

Fire Risk to the Parkway & Emergencies

I41-15

I am concerned about the increased fire risk that the Parkway and nearby residences will be subjected to, given the significant increase in human activity and the amount of electrical equipment so close to a large, vegetated area. The DEIR claims the project would have no impact with respect to increasing wildfire risk without providing reasoning or evidence that the new electrical infrastructure would assuredly not increase fire risk. The FEIR must include a specific study that evaluates the ignition risk of the proposed electrical equipment including,

wiring/controls, malfunction/ignition potential, and the proximity to Parkway vegetation to determine the fire consequence and potential impacts.

I41-15 (Cont.)

Increasing electrical equipment and human presence from 288 people to, for example, 3,500+ during graduation is a massive increase in potential human ignition risk, which is the likelihood that human activities will start a wildfire. This probability of ignition can be quantified by using a simplified Poisson model, historical ignition rates, and expected activity levels: $(\text{ignition}) = 1 - e^{-\lambda E}$ in which λ=estimated ignition rate per unit of human activity or exposure, and *E*=total anticipated exposure, such as vehicle trips, equipment operating hours, or visitor-days. The FEIR must include a more thorough investigation of the cumulative fire/ignition risk of existing electrical infrastructure at Rio + proposed/new electrical infrastructure at Rio + electrical infrastructure at Jesuit + cell tower electrical infrastructure + 3,500+ human activity + proximity to vegetation.

I41-16

The DEIR's emergency plans rely heavily on external agencies and successful implementation of operational traffic management mitigation strategies to keep routes unobstructed, for which I do not see as dependable or stringent enough to guarantee the protection of 3,500+ people and nearby residences. An analysis of traffic congestion and discussion of emergency vehicle access is not the same as a simulation of emergency evacuation or emergency response during a stadium event. The FEIR must include traffic model simulations that specifically evaluate several potential emergency scenarios with emergency vehicles inserted into peak-event traffic conditions. Results should present travel times, delays, route clearance, ability to reach the stadium, and any other complications. These simulations should be run with and without operational traffic management mitigation measures accomplished.

I41-17

Proposed Cell Tower

I41-18

The proposed cell tower poses critical potential impacts from radiofrequency (RF) emissions on students, staff, recreationists, wildlife, and insects, yet there was no mention or analysis of this included in the DEIR. The FEIR must include an analysis of all possible RF emissions impacts. Stating that the cell tower falls within federal regulations for human exposure does not exempt the District from the responsibility of researching its impacts. In fact, the U.S. has among the most lenient federal regulations for cell tower radiation. Numerous other countries have limits up to 100 times stricter or have banned cell towers at schools altogether [source]. A 2014 U.S. Department of the Interior letter warned that FCC standards are only "based on thermal heating, a criterion now nearly 30 years out of date and inapplicable today" [source].

Scientific research suggests that children absorb higher rates of RF radiation and are biologically more vulnerable to the RF radiation emitted by cell towers [source]. As such, numerous scientists recommend that cell towers are distanced at least 1,500 feet from schools. Research has reported a range of impacts including cancer, neurological symptoms, and reproductive harm—associated

with long-term, low-level cell tower radiation exposure, even at levels below government limits. New cell towers on school property have been banned or restricted in districts including Los Angeles, Palo Alto and Temecula Valley Unified in California to Loudoun County, Virginia. These districts recognized that precaution, transparency, and public trust matter—especially when it comes to children.

I41-18 (Cont.)

The U.S. does not set RF emission exposure regulations for biological resources, but again, this should not exempt this project from evaluating these potential impacts. There is an extensive pool of scientific research reporting significant impacts on biological resources caused by cell tower and similar RF emission sources. Scientific research suggests that 5G technology has the ability to disrupt critical ecosystems and the living organisms within them with broad effects throughout their entire food webs [source]. Science also suggests that RF radiation and oscillating magnetic fields have been reported to disrupt the migratory compass orientation in migratory birds [source]. Many non-human species are highly vulnerable to EMF from cell towers because they depend on the Earth's static geomagnetic fields for: seasonal migration/orientation, nest/den building, mating, reproduction, offspring care, food finding, territorial defense, daily/seasonal circadian rhythms, and even longevity and survivorship [source].

While humans on the ground can maintain a distance from direct RF emissions, birds and insects can fly right next to them or even land on them. Scientific research suggests that exposures common to cell towers are capable of disastrous effects on a wide range of insects that rely on olfactory and/or visual memory, including bees. Impacts on insect populations and community dynamics can significantly impact food web functions [source], which can cause cascading effects throughout the ecosystem.

The FEIR must evaluate any and all short-term and long-term RF emission-related impacts on both humans and biological resources potentially caused by the installation of a cell tower on campus and adjacent to the Parkway.

I41-19

Assumptions

Throughout the DEIR, many assumptions—both quantitative and qualitative—are used to make significance impact determinations. However, these assumptions are rarely presented as enforceable project requirements or limits. For example, the transportation analysis uses an attendee count of 3,400 people, whereas there is no actual event attendee capacity policy in place. Therefore, if attendance were to exceed that amount, the project would fall out of the modeled constraints that were used to determine impact significance. Since the DEIR notes graduation as having an *average* of 3,500 attendees, exceeding the 3,400-person assumption of the transportation analysis is a real time possibility.

I41-20

All assumptions used in the FEIR that contribute to impact significance determinations must be established as enforceable project requirements or limits in order to ensure that actual project operations remain consistent with the conditions evaluated in the environmental analysis and that the FEIR's conclusions regarding the significance of environmental impacts remain valid.

I41-20 (Cont.)

Conclusory Remarks

I41-21

As presented above, the DEIR is sorely deficient in many areas and fails to capture the true impacts of the project. I encourage the District and consultants to take the time needed to ensure that the FEIR is substantially more effective, scientifically sound, and defensible.

Lastly, it must be noted that this project is non-essential. Games have been held at El Camino, graduations have been held at the Memorial Auditorium, and it should remain as such. I can sympathize with the students who would appreciate the convenience and pride of experiencing their school's own high-intensity stadium with all the bells and whistles that other schools have. However, this stadium upgrade project, located in a delicate and beloved area, affectionately called Sacramento's Crown Jewel, is simply irresponsible and inappropriate. Sometimes we have to look at the bigger picture, outside of ourselves and personal desires, and seek the greatest good. As adults, we must be role models and show the next generations how important it is to be stewards of the Earth—to act in ways that acknowledge how our actions impact others, nature, and the future. This is a golden opportunity to teach the youth that preservation of the environment takes precedence over convenience and pride.

Thank you for your consideration,

Candice Heinz

Letter I42

From: Reinhard Hohlwein
To: Rio Americano; nicholas.arps@sanjuan.edu
Date: Friday, October 16, 2026 5:19:43 PM

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Report Suspicious

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.

To whom it may concern:

I am a resident of Arden Arcade and have visited and loved the American River Parkway for 5 decades. I commuted to downtown on the bike trail for nearly 2 decades. I know it very well. One of the best spots, one of my absolute favorites, is directly behind Rio Americano High School. There are two benches facing the river where otters and beavers and other wildlife perform a daily and nightly ballet where they emerge near sunset when they emerge to feed and frolic and swim. I have watched this countless times. I have watched other folks stop and admire the scene which is rare along the river.

The construction of a heavily lighted stadium directly across from this area will negatively affect the wildlife, on a regular basis. As well as ruin what is one of the most precious places in Sacramento. I42-1

I am asking that you reconsider the location of the stadium as there is no other source of bright overbearing lights and concentrated public activity so close to the parkway. The two uses are incompatible. I42-2

Thank you for your consideration from the public who adores the area as it is and is not in support of the project as proposed.

Sincerely,

Reinhard Hohlwein

4236 De Ville Court
Sacramento, CA 95821
Sacramento

Letter I43

From:	Evan Hood
To:	Rio Americano
Subject:	Thoughts on the stadium
Date:	Wednesday, September 9, 2026 10:54:19 PM

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Me personality, I think it’s low-key a hella good change me personality I43-1

Letter I44

From:	Michael Hooper
To:	Rio Americano
Cc:	Hailey Heller; Brent William Kaleonuiokalani Heller
Subject:	Rio Americano Stadium Project
Date:	Tuesday, September 8, 2026 10:37:58 PM

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I have read the voluminous EIR for the Rio Americano Stadium in it's entirety.

As a neighbor as well as an alumnus of Rio, I am closely impacted by the projects.

First of all, I live near Saverien Drive. A couple of years ago I was concerned with installation of the lights and sound system at Jesuit. Since Jesuit is essentially the same distance as the Rio project, I find it to be a valid comparison. Even when I am aware of Jesuit games I have never noticed any "light pollution" from the stadium. Additionally, I have never heard any noise from the sound system. Since the distance to Rio is 50 feet further, I do not expect any light or sound issues.

I44-1

I attended Rio from 1966 until 1970. My daughter graduated from Rio. Her oldest daughter will attend Rio next year with another daughter a couple of years behind. As a Rio alumnus, I have always viewed our lack of a stadium as a huge negative to school spirit revolving around the tootball program. "Home" games at El Camino were never really "home" which has a negative competitive impact. Home teams are notorious for an advantage albeit difficult to determine. When I was first selected to attend Rio instead of El Camino, the football stadium was to be in the future. In fact, when I started at Rio the girls gymnasium did not exist.

Now, 60 years later, we might finally be getting our stadium in time for my granddaughters who are already training for the cheerleading team in the Junior Jesuit Marauder program.

Clearly, I favor the project and look forward to my grand kids enjoying their team.

I44-2

Regards,

Michael Hooper
(916) 955-1955 cell
1michaelhooper@gmail.com

Letter I45

From: Michael and Gay Dittrich Jones
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 7:18:34 PM

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To whom it may concern,

I45-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I45-2 This proposal's lack of an improved evacuation plan and security of any type I45-3 leaves students, parents, staff and attendees at serious risk to their safety.

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I45-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I45-5

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I45-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.
Incomplete Environmental Baseline and Project Description – I45-7

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I45-8

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I45-9

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I45-10

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I45-11

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I45-12

Thank you for your consideration,

Gay Jones

Sent from my iPad

Letter I46

From: Nicholas Arps
To: Rio Americano
Subject: FW: Rio Americano Stadium
Date: Sunday, September 27, 2026 9:01:57 PM

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Report Suspicious

Nicholas Arps, LEED AP
Director of Facilities, Construction & Modernization
San Juan Unified School District
6135 Sutter Ave., Carmichael, CA 95608
nicholas.arps@sanjuan.edu
916-971-5780 Ext 219011

From: Paul Jorjorian and Hannah Mitchell <jorjorian@shaw.ca>
Sent: Saturday, September 26, 2026 10:59 AM
To: Melissa Bassanelli <MBassanelli@sanjuan.edu>
Cc: Nicholas Arps <nicholas.arps@sanjuan.edu>
Subject: [EXTERNAL] Rio Americano Stadium

You don't often get email from jorjorian@shaw.ca. Learn why this is important

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I46-1 I46-2 I46-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I46-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science I46-5

program with the Parkway as the educational opportunity of a lifetime. I46-5 (Cont.)

I have further outlined my concerns about the project and the DEIR below. I46-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I46-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I46-8

Incomplete Environmental Baseline and Project Description – I46-9

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• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I46-10 I46-11

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Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I46-15

Thank you for your consideration,

Paul Jorjorian

2633 7th Ave

Sacramento CA 95818

Virus-free.www.avast.com

Letter I47

From:	AUDREY KAMILOS
To:	Rio Americano
Subject:	Comments on Rio Americano High School Stadium Draft EIR - Bruce Kamilos
Date:	Friday, October 2, 2026 2:32:32 PM
Attachments:	BKamilos RioAmericanoHSStadiumDrafEIR Comment Letter - 10.02.2026.pdf

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Hello Mr. Nicholas Arps,
Attached is my comment letter regarding the Rio Americano High School Stadium Draft EIR. Please include the letter in the administrative record and address the comments in the Final EIR.
Thank you,
Bruce Kamilos

I47-1

Bruce Kamilos
720 Morris Way
Sacramento, California 95864
kamilos@comcast.net | (916) 612-1058

October 2, 2026

Via Email: RioEIRcomments@aecom.com
Nicholas Arps, Director, Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, California 95608

Re: **Comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH No. 2026010094)**

Dear Mr. Arps and Members of the Board of Education:

I submit these comments as a nearby resident and professional engineer. I support safe, accessible athletic facilities for students. I oppose, however, converting this location into a substantially more intensive nighttime event venue without a complete and reliable environmental review. I therefore object to certification of the Draft EIR and approval of the proposed project. I47-2

The central problem is the District has bundled broadly supportable safety and accessibility improvements with permanent 80-foot stadium lighting, greatly expanded spectator capacity, amplified sound, and intensive nighttime use. The Draft EIR then fails to analyze a reasonable reduced project that would provide the safety and accessibility benefits without the full nighttime stadium program. I47-3

Why the Board should not certify this EIR

• The Draft EIR admits that operational stadium-event noise would remain significant and unavoidable, yet it does not evaluate the reduced-capacity, no-permanent-lighting, earlier-curfew, and operations-limited alternatives raised during scoping. I47-4

• The project is not described consistently. Event counts, practice days, attendance, graduation attendance, lighting equipment, end times, and community use differ among chapters and appendices, or are left as nonbinding estimates. I47-5

• The lighting conclusion depends on a future design review and a different “similar” project. The disclosed appendix contains no project-specific DarkSky pass letter, no final operating policy, and no requirement for post-installation field certification. I47-6

• The traffic analysis treats 327 public curb spaces along American River Drive and Saverien Drive as available stadium parking. These spaces adjoin residential properties, are not reserved or secured for the project, may already be occupied by residents and their visitors, and still leave 296 vehicles without identified parking under the 3,400-attendee scenario. The EIR further assumes that overflow may spread onto other nearby residential streets, but it does not analyze the resulting neighborhood noise, headlights, vehicle circulation, pedestrian activity, driveway conflicts, or emergency-access effects. I47-7

• The Parkway analysis uses daytime noise data to evaluate nighttime disturbance, relies on selected rounded 0.00-foot-candle predictions, and does not meaningfully evaluate the proposed 5700 K spectrum or repeated evening use. I47-8

Requested action I47-9

The District should select the No Project Alternative. At minimum, it should decline to certify the current EIR and circulate a revised Draft EIR that: I47-10

• defines an enforceable maximum operating scenario and uses it consistently in every chapter;

• considers a smaller project that completes the needed safety and accessibility improvements without permanent high-mast lighting or expanded nighttime stadium use; I47-11

• provides complete lighting, noise, parking, and wildlife studies that clearly explain the methods, assumptions, and results so they can be independently checked; I47-12

• establishes clear operating limits, monitors compliance, identifies what constitutes a violation, and requires corrective action when a violation occurs; and I47-13

• analyzes simultaneous Rio and Jesuit events without assuming that Jesuit parking remains available. I47-14

Attachment A provides numbered technical comments. My February 2, 2026 scoping letter is incorporated by reference. Please include this submission and all attachments in the administrative record and provide a separate, good-faith, reasoned response to each numbered comment. I47-15

Because the deficiencies concern the project description, significant-and-unavoidable noise, feasible alternatives, and the basic assumptions used across multiple chapters, correcting them may disclose significant new information or a feasible way to avoid substantial effects. If so, the revised analysis must be recirculated under CEQA Guidelines section 15088.5. I47-16

The existence of significant and unavoidable effects does not excuse an inadequate EIR, and a statement of overriding considerations cannot cure informational or mitigation defects. The Board should not approve a project until it has before it a complete analysis and a meaningful choice among feasible alternatives. I47-17

Sincerely,



Bruce Kamilos, P.E.
Resident, 720 Morris Way

ATTACHMENT A

NUMBERED TECHNICAL COMMENTS

Rio Americano High School Stadium Improvements Draft EIR

I47-18

Each comment below identifies the Draft EIR's position, the conflicting or missing evidence, the environmental consequence, and the correction necessary for informed review. Page references use the printed page numbers in the Draft EIR unless otherwise noted.

Comment 1. The EIR does not provide a stable, enforceable maximum operating scenario.

I47-19

What the Draft EIR says. The project description estimates five to eight football games, identifies various practices and school activities, states that practices "generally" end by 8:00 p.m., that "most" games end by 9:00 p.m., and that football "usually" ends by 10:00 p.m. but may continue until 11:00 p.m. It also anticipates community use without a binding annual limit. (Draft EIR, pp. 3-7–3-9 and Table 3-1.)

What the record shows. The noise chapter evaluates "approximately 13 new" events, while the aesthetics analysis relies on 40 nighttime event days and as many as 88 practice days. Table 3-1 lists graduation attendance of 3,500; the narrative elsewhere estimates approximately 1,400; and transportation analyzes 3,400 attendees although the new bleachers hold approximately 2,575. The words "generally," "most," "usually," "could," and "up to" do not impose enforceable limits.

Why this matters. Event frequency, attendance, hours, cleanup, lighting duration, amplified sound, and community rentals drive the project's noise, light, traffic, parking, and wildlife effects. Different chapters cannot reach reliable conclusions using different versions of the project.

I47-20

> Required correction. Revise the project description to establish binding maximum nighttime event and practice days per year and week; maximum attendance by event type; limits on community rentals; fixed end times for play, amplified sound, parking-lot activity, and lighting; a brief, low-level egress mode; and a prohibition on exceeding these limits without additional CEQA review. Reanalyze every impact using the same maximum scenario.

Comment 2. The alternatives analysis omits the most obvious ways to reduce the admitted significant noise impact. I47-21

What the Draft EIR says. The EIR analyzes No Project and a major reconfiguration that would demolish, relocate, and rebuild multiple facilities. It rejects a new off-campus stadium, morning scheduling, and use of other existing stadiums. (Draft EIR, Chapter 6.)

What the record shows. My February 2, 2026 scoping letter specifically requested No Permanent Lighting, Reduced Height/Illumination, Reduced Capacity, and Earlier Curfew alternatives. None is analyzed as a coherent alternative. The EIR nevertheless concludes that construction and operational stadium-event noise would remain significant and unavoidable. I47-22

Why this matters. CEQA Guidelines section 15126.6 requires a reasonable range of alternatives capable of achieving most basic objectives while avoiding or substantially reducing significant effects. An alternative may impede some objectives or cost more. The range presented here gives the public a choice between the proposed project, no project, and a more disruptive reconfiguration, but not a reasonable reduced project. I47-23

> Required correction. Analyze at least: (1) safety, accessibility, track, field, and code upgrades without permanent high-mast lighting or greatly expanded seating; (2) capacity capped at verified parking and emergency-access capacity; (3) lower-output, warmer-spectrum lighting with fewer fixtures and restrictive presets; (4) a 9:00 p.m. curfew; and (5) fewer night events, no outside rentals, and continued off-site use for the largest games. Quantify the reduction in noise, light, traffic, parking, and wildlife effects for each.

Comment 3. The EIR does not demonstrate project-specific DarkSky compliance. I47-24

What the Draft EIR says. The EIR states that project lighting will meet DarkSky standards and relies in part on a “pass” issued for a different, similar project. Mitigation Measure 4.1-2 requires a future preconstruction design submission. (Draft EIR, pp. 4.1-23–4.1-26.)

What the record shows. Appendix B is a Musco computer calculation dated December 21, 2025. The disclosed appendix does not contain a project-specific DarkSky pass letter or certificate. Current DarkSky sports-lighting guidance distinguishes a Phase 1 design letter from a Phase 2 installation certificate following field verification. Appendix B warns that field measurements may differ from calculated predictions, but Mitigation Measure 4.1-2 does not require as-built measurements or Phase 2 certification.

Why this matters. A promise to review the lighting design later does not, by itself, support the Draft EIR's conclusion that lighting impacts would be less than significant. The EIR should state what standards the final design must meet and how compliance will be checked. A finding for a different project does not establish that this project's lighting will comply, given its pole locations, nearby homes, fixtures, paths, and operating settings. I47-25

Required correction. Before certifying the EIR, disclose the project-specific lighting design, DarkSky's design review and comments, and the measurable standards the installed lights must meet. Require independent field testing at nearby homes after installation, correction of any exceedances, and public release of the results. Do not allow nighttime use until that testing is complete and DarkSky has issued its Phase 2 installation certificate. Repeat the testing after fixtures are replaced or re-aimed, and when complaints indicate that the lighting may no longer meet the standards.

Comment 4. The glare and light-trespass conclusions cannot be reconciled with the photometric results. I47-26

What the Draft EIR says. The EIR repeatedly describes off-site light trespass as zero and calls the reported glare level "low." (Draft EIR, pp. 4.1-19–4.1-25.)

What the record shows. The same discussion reports positive horizontal illuminance of approximately 0.02 to 0.13 foot-candle and vertical illuminance of approximately 0.05 to 0.28 foot-candle at the property boundary. Appendix B reports glare values averaging 3,992 candela and reaching 10,016 candela under the all-fixtures condition; other reported grids reach approximately 2,749 candela. Current DarkSky guidance uses a 1,000-candela criterion at a specified glare evaluation observation distance and ten-foot spacing. The appendix values may not have been calculated at that same geometry, but the EIR does not identify or reconcile the difference.

Why this matters. Positive modeled values cannot simultaneously be characterized as zero. Nor can the public verify compliance when the EIR does not identify the controlling observation geometry, receptor spacing, threshold, and operating preset. The same zero-trespass premise is carried into aesthetics, biology, Parkway consistency, and cumulative impacts. I47-27

Required correction. Provide final horizontal and vertical illuminance, glare, and skyglow analyses for every fixture and preset at property lines, nearest residential façades and yards, the levee, trail, and habitat edge. Identify the applicable criteria and observation geometry; use required receptor spacing; reconcile every positive value with the significance conclusion; and revise all dependent chapters. I47-28

Comment 5. The EIR does not establish enforceable lighting operations or analyze a less harmful spectrum. I47-29

What the Draft EIR says. The project description states that lighting can be reduced “by as much as half” and that reduced lighting may remain on briefly after events. The design uses 5700 K LEDs. The EIR relies on general Night Event Management Standards that are not incorporated as enforceable mitigation.

What the record shows. No final lighting policy, preset schedule, automatic shutoff time, operator access restriction, event log, complaint deadline, or corrective-action trigger is disclosed. A statement that lighting can be reduced by as much as half does not establish the actual practice or egress level. DarkSky permits up to 5700 K for sports lighting but encourages lower color temperature to reduce skyglow and improve visual comfort.

Why this matters. Lighting effects depend not only on fixture optics but also on spectrum, intensity, duration, frequency, and operator behavior. Without binding controls, the EIR cannot assume that reduced modes and curfews will occur.

> Required correction. Require fixed and locked presets for competition, practice, and egress; automatic shutoff at a hard curfew; a maximum low-level egress duration; no decorative or unnecessary lighting; event and preset logs; a complaint-response deadline; mandatory inspection and correction triggers; and comparative analysis of a substantially warmer, lower-output design.

Comment 6. The visual analysis does not depict the most affected residential and Parkway viewpoints. I47-30

What the Draft EIR says. The EIR acknowledges four 80-foot poles, enlarged bleachers, and a press box roughly 30 feet above grade, but concludes that the poles will blend with the sky and that intermittent Parkway visibility would not be substantial.

What the record shows. The simulations do not fully depict the final project from the closest residential backyards and occupied façades or provide a comprehensive nighttime view from the levee and trail. A view from a street or front yard is not a substitute for the closest outdoor and indoor living areas. The visual conclusions also depend on the disputed zero-light-trespass premise.

Why this matters. The issue is the physical change experienced at sensitive public and residential viewpoints, not merely whether the District is exempt from a particular local scenic regulation. Accurate simulations are necessary for the Board and public to understand the scale and nighttime appearance.

Required correction. Provide verified daytime and nighttime simulations using the final design, consistent exposure and camera information, realistic vegetation assumptions, and viewpoints from the closest residential yards and façades, the levee crown, and the trail. Disclose pole, luminaire, bleacher, press-box, and path-light visibility in each view.

I47-30 (Cont.)

Comment 7. The operational-noise model is a screening estimate, not a site-specific analysis of the final project.

I47-31

What the Draft EIR says. The EIR uses a 3,400-person football game at El Camino High School as a surrogate and predicts potentially substantial increases at nearby homes. It then concludes operational stadium-event noise would remain significant and unavoidable. (Draft EIR, pp. 4.3-18–4.3-27.)

What the record shows. The surrogate stadium has different geometry and receptor relationships. The analysis measures from an "acoustical center" approximately 350 feet from residences and applies six-decibel-per-doubling point-source attenuation to distributed crowd, bleacher, band, speaker, parking, and travel-route sources. Portions of the expanded stadium and associated activity are closer to receptors. Final speaker and barrier information is not modeled.

Why this matters. The admitted significant impact deserves a reproducible site-specific assessment. A simplified attenuation calculation may obscure the contributions of distributed, impulsive, directional, and low-frequency sources and the effectiveness of proposed controls.

I47-32

Required correction. Model representative and worst-case events using the final speaker layout, bleachers, ramps, press box, barriers, topography, parking areas, and travel routes. Report combined Leq, Lmax, and relevant frequency content at the nearest residential façades and yards and at Parkway receptors. Explain assumptions and provide model inputs sufficient for independent review.

Comment 8. Noise mitigation limits only the PA system and omits enforceable monitoring and correction.

I47-33

What the Draft EIR says. Mitigation Measure 4.3-1b requires a daytime sound check and a 70 dBA Lmax limit for the PA system at the nearest residential property line. It allows an alternative performance level under stated conditions and contains operational limitations after 10:00 p.m.

What the record shows. The measure does not limit total event noise, combined Leq, crowd or band noise, impulsive bleacher noise, or low-frequency content. It does not require monitoring during a representative nighttime, high-attendance event. Bleacher treatments are described as measures that "may" be used or may be deemed infeasible. The significance discussion mentions complaint response and corrective action, but that language is not included as an operative requirement.

Why this matters. The identified impact arises from the combined event, not only the PA system. A one-time daytime test cannot show that a full nighttime event complies. An unenforceable narrative assurance cannot substitute for mitigation.

I47-33 (Cont.)

Required correction. Set limits for total event Leq, Lmax, and increase above ambient at residential receptors; require pre-opening nighttime commissioning and monitoring during representative high-attendance events; prohibit amplified sound and band activity after a hard curfew; require a published complaint process, response deadlines, event logs, and mandatory corrective actions; and reduce attendance or operations after exceedances.

I47-34

Comment 9. The parking deficit is not resolved by identified supply or enforceable mitigation.

What the Draft EIR says. The transportation analysis assumes that highly attended events can be accommodated through on-campus parking, approximately 327 public curb spaces along American River Drive between Morris Way and Piccadilly Circle and along Saverien Drive between American River Drive and Ashton Drive, additional parking on other nearby residential streets, and coordinated use of Jesuit High School parking. The operational-noise analysis separately models activity from approximately 391 vehicles in the northern on-campus parking lots and predicts 47 dBA Leq at a representative residence approximately 350 feet from the modeled acoustical center. (Draft EIR, pp. 4.3-19 to 4.3-20 and 4.4-4 to 4.4-15; Appendix E, pp. 14-15 and Exhibit 11.)

I47-35

What the record shows. For 3,400 attendees, Appendix E estimates 1,295 vehicles and a 623-space on-campus deficit. It derives the 327 curb spaces principally by dividing six street-segment lengths by 25 feet per vehicle, including approximately 254 spaces along American River Drive and 73 along Saverien Drive. These are public curb spaces adjoining homes, not spaces reserved or guaranteed for stadium use. The analysis does not disclose a representative Friday-evening occupancy survey establishing how many spaces are already used by residents or a curb-by-curb legal inventory documenting deductions for driveways, hydrants, red curbs, intersections, crosswalk-approach clearances, bicycle conflicts, and other unavailable or unsafe locations. Even if all 327 spaces were vacant and legal, 296 vehicles would remain without identified parking. Table 17 incorrectly labels that remaining deficit a "surplus," and the text suggests that vehicles may spread onto additional neighborhood streets within approximately one-half mile. The noise analysis models only on-campus parking activity. It does not evaluate hundreds of vehicles and pedestrians arriving, parking, and departing immediately beside residences, including door slams, engine starts, alarms, conversations, headlights, idling, and concentrated post-event circulation.

I47-36

Why this matters. The EIR effectively treats residential streets as an extension of the stadium parking lot while omitting the resulting neighborhood activity from its noise analysis. Public curb space is shared with residents and cannot be assumed to be available or treated as secured mitigation. Parking spillover may affect driveway access, intersection visibility, pedestrian and bicycle safety, emergency access, ambient noise, nighttime lighting, and the quiet use of adjoining homes. In Taxpayers for Accountable School Bond Spending v. San Diego Unified School District (2013) 215 Cal.App.4th 1013, the court found a school stadium parking review deficient where the district had not established actual street-parking availability during the relevant Friday-evening period. The court also recognized that resident observations and photographs of spillover, blocked driveways, reduced visibility, and neighborhood congestion may constitute substantial evidence. Sacramento County Code Chapter 10.30 likewise recognizes that residential areas may be adversely affected by non-resident vehicles parked during the day, night, weekends, or holidays.

I47-37

Required correction. Correct the Table 17 arithmetic and conduct representative Friday-evening parking-occupancy surveys during comparable event and non-event conditions. Provide a curb-by-curb inventory that excludes every space unavailable under the California Vehicle Code and Sacramento County parking restrictions and accounts for existing resident use. Analyze the noise, headlights, circulation, pedestrian, bicycle, driveway, and emergency-access effects of using American River Drive, Saverien Drive, and other residential streets for event parking. Do not count public residential curb space as guaranteed project parking. Before certification, identify secured off-street parking and safe pedestrian or shuttle routes sufficient for the maximum attendance scenario. If adequate capacity cannot be demonstrated, impose an attendance cap tied to verified on-campus and contractually secured off-site parking. Require enforceable event staffing, monitoring, complaint response, corrective actions, and District funding for any County-approved residential permit-parking or event-parking restrictions needed to protect affected streets. I47-38

Comment 10. The transportation plan and Jesuit parking arrangement are deferred and may fail during concurrent events. I47-39

What the Draft EIR says. Mitigation Measure 4.4-3a requires the District to coordinate with Jesuit concerning an updated shared-parking agreement. Mitigation Measure 4.4-3b requires a transportation plan before the first event expected to need off-site parking, with evaluation after the initial event.

What the record shows. The measure does not require a disclosed executed agreement for a specified number of spaces before project approval or ticket sales. Jesuit parking is available only if Jesuit lacks a concurrent high-attendance event. The cumulative analysis nevertheless evaluates concurrent Rio and Jesuit games, when the assumed overflow supply may not be available. Important pedestrian measures remain to be selected later, and the first large event becomes a public test case.

Why this matters. Mitigation may rely on later details only when it commits to enforceable performance criteria and actions. Here, parking supply and pedestrian controls are essential to feasibility and safety, but the public cannot evaluate them before approval. I47-40

Required correction. Require an executed shared-parking agreement identifying guaranteed spaces, operating conditions, routes, security, and enforcement, or analyze the project without those spaces. Adopt the complete event transportation plan before certification; require reservations, remote parking or shuttle service, neighborhood controls, trained crossing personnel, emergency protections, pre-event review, monitoring, and mandatory attendance reduction when capacity is insufficient.

Comment 11. The Parkway biological analysis uses daytime conditions to evaluate nighttime disturbance. I47-41

What the Draft EIR says. The EIR acknowledges that artificial light can affect bats and birds and predicts football-game noise of approximately 59 to 72 dBA Leq at the Parkway habitat edge, approximately 4 to 17 dBA above the ambient value used. It concludes operational effects would be less than significant or, for movement, no impact. (Draft EIR, pp. 4.2-17–4.2-21.)

What the record shows. The habitat comparison uses a daytime noise measurement even though the new exposure occurs at night. No representative nighttime baseline was collected south of the site. The lighting analysis relies on selected rounded 0.00-foot-candle values and does not meaningfully assess the 5700 K spectrum, skyglow, repeated evening exposure, or combined light and noise. Football begins in August, and practices and other uses occur throughout the school year, overlapping portions of identified sensitive seasons. I47-42 I47-43

Why this matters. Daytime ambient noise can mask an increase that would be more pronounced at night. Wildlife effects involve spectrum, visibility, attraction, disorientation, stopover behavior, and repeated disturbance, not just horizontal illuminance or migration altitude. The no-impact movement conclusion is difficult to reconcile with the acknowledged potential for behavioral disruption. I47-44

> Required correction. Collect representative nighttime noise and light data; assess the final spectrum, intensity, skyglow, frequency, and seasonal schedule; evaluate nocturnal bats, migratory birds, and other sensitive wildlife through qualified biological review; analyze combined light and noise; and adopt measurable monitoring, shielding, spectral reduction, reduced-hour, and curtailment requirements.

Comment 12. The cumulative analysis relies on assumptions that fail under simultaneous Rio and Jesuit events. I47-45

What the Draft EIR says. Chapter 7 identifies Jesuit stadium lighting and considers simultaneous high-attendance events, but concludes most cumulative effects would be less than significant while acknowledging significant-and-unavoidable cumulative noise.

What the record shows. The analysis does not quantify combined nighttime skyglow, glare, event noise, parking demand, pedestrian flows, or neighborhood circulation. It repeats Rio's disputed zero-trespass premise and relies on Jesuit parking even though that supply may be unavailable when Jesuit is holding the simultaneous event. The noise discussion first suggests Rio's contribution is not cumulatively considerable and later acknowledges that it is cumulatively considerable and significant and unavoidable.

Why this matters. The concurrent-event condition is a foreseeable worst case. It cannot be analyzed by assuming away the principal parking conflict or by carrying forward unsupported project-level conclusions. I47-46

> Required correction. Quantify the maximum overlapping Rio and Jesuit event condition for lighting, skyglow, noise, parking, queues, pedestrian safety, and emergency access. Do not count Jesuit parking during a Jesuit event. Reconcile the cumulative-noise findings and impose scheduling, attendance, parking, and operating restrictions necessary to avoid or reduce the combined effects.

Comment 13. The mitigation program lacks objective enforcement mechanisms across resource areas. I47-47

What the Draft EIR says. The EIR relies on future standards, plans, optional measures, and staff judgment to support less-than-significant conclusions.

What the record shows. Lighting lacks as-built certification and violation triggers; noise lacks total-event limits and representative-event monitoring; transportation relies on a future plan and adjustable attendance trigger; and biology lacks nighttime monitoring or curtailment. Several relied-upon assurances do not appear in the operative measures. I47-48

Why this matters. Public Resources Code section 21081.6 requires mitigation to be fully enforceable. The monitoring program must identify responsibility, timing, standards, documentation, and consequences of violation. I47-49

> Required correction. For each operational measure, specify responsibility, timing, objective standards, monitoring methods, public reporting, complaint procedures, violation thresholds, immediate response, verification, and mandatory escalation. Put every relied-upon operating standard and agreement into enforceable project conditions.

Comment 14. Material corrections require recirculation. I47-50

What the Draft EIR says. The EIR leaves material design, plans, agreements, and analysis for later responses without committing to recirculation.

What the record shows. Final lighting, parking supply, enforceable controls, and reduced alternatives could reveal worse effects or feasible ways to avoid them.

Why this matters. CEQA Guidelines section 15088.5 requires recirculation when significant new information would otherwise deny meaningful public comment on an adverse effect or feasible mitigation or alternative.

Required correction. Circulate a revised Draft EIR with the corrected project, analysis, enforceable mitigation, and reasonable alternatives; do not add material information only in responses

I47-50
(Cont.)

Letter I48

From: Janice Kelley
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: DEIR Comment Letter and additional concerns
Date: Thursday, October 15, 2026 9:29:57 PM
Importance: High

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Report Suspicious

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I48-1

To whom it may concern, I48-2

I am expressing my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I48-3 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I48-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I48-5

Note the District, within the last ten years, added a track field at the stadium's proposed location.

The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I48-6

I am concerned about the $$$ investment by the District into this project. I have seen dozens of families waiting in their cars at 2 church food banks located within the San Juan Unified School District service area. These families have been deprived of their basic need for food due to federal funding cuts. I48-7

Parents have told me the District has cut funding for Special Programs, such as Visual and Performing Arts and others. These dramatic cuts have directly impacted the quality of life for families everyday and turned away the outside resources that provides these services because they have no funding to support them.

> **Yet, the San Juan District is willing to commit millions of dollars to build an expansive stadium and cell tower and seriously disrupt the lives of wildlife literally living across the street.**
>
> **I BELIEVE ANY SCHOOL DISTRICT NEEDS TO CONSIDER ITS INHERENT VALUES AND MISSION TO EDUCATE AND ENRICH**

LIVES OF ITS STUDENTS AND FAMILIES FIRST - INSTEAD OF CONSTRUCTING A STADIUM THAT IS BOTH UNNECESSARY AND EXPENSIVE.

A BETTER SOLUTION IS TO ALLOCATE $$ TO USE THE AMERICAN RIVER PARKWAY AS A LEARNING MODEL FOR ALL STUDENTS.

THIS STADIUM IS A SAFETY HAZARD. IT IS A SERIOUS DISRUPTION TO THE WILDLIFE AND SENSE OF PEACE AND BEAUTY THAT CAN ONLY BE ENJOYED ON THE AMERICAN RIVER PARKWAY

I48-7 (Cont.)

I48-8

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short:

I48-9

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

I48-10

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.

I48-11

Incomplete Environmental Baseline and Project Description –

I48-12

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008.

I48-13

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using.

I48-14

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use.

I48-15

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.

I48-16

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

Thank you for your consideration,

Janice Kelley 916-965-5246

"What's Your Story?" Author, Naturalist and Community Education Programs Leader
https://naturelegacies.com

Making a Difference in Young Lives - Combining Art, Science and Literacy to Inspire Meaningful Connections to the Outdoor World
https://naturedetectivesusa.com

Letter I49

From:	Kilted_John
To:	Rio Americano
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 4:10:17 PM

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Report Suspicious

To whom it may concern, I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I49-1

I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I49-2

This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I49-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I49-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I49-5

I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. I49-6

Please advise how this intended project complies with the Sacramento County Noise Ordinance. I49-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I49-8

Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I49-9

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I49-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I49-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I49-12

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I49-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I49-14

Thank you for your consideration, [name]

Letter I50

From:	Nancy Kniskern
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject:	Public Comment for Rio Americano Stadium
Date:	Friday, October 16, 2026 12:38:04 AM
Attachments:	Rio Americano 10-15-26 Public Comment.docx

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Report Suspicious

Attached please find my public comment RE: the stadium

I50-1

Thank You,
Nancy Kniskern
College Greens East

To All Concerned:

I50-2

I live a half-mile south of the Rio Americano High School, along the American River Parkway. I hear when Rio Americano has exciting outdoor events, and I am glad to hear the cheers, but not so happy to hear the loud speakers and horns. Because of this location, I am concerned with an increase in noise, lights and possible degradation of the riverine environment that is an inevitable companion of the stadium project. I am a fan of the Parkway, and enjoy the access I have to this peaceful wildlife paradise, also known as the "Crown Jewel of Sacramento." I am interested in having the American River Parkway thrive, and the school expanding their educational/athletic opportunities – but not if this growth impairs the Parkway. I hope you can relocate this ambitious project to a more supportive area with plenty of parking and away from this wilderness area.

I50-3

The Draft Environmental Impact Report (DEIR) is presented as a compendium of unrelated parts pieced together to comply with the letter of the requirement, but not the purpose – which is to inform the public of the Environmental Impacts, and appropriate mitigation measures. This explains the process of ensuring choices that are environmentally sound. However, I found that this document falls short of adequate consideration and presentation of data.

I50-4

These are some of the examples:

Addressing Air Quality:

I50-5

When addressing the mitigation efforts for the air quality, the project cites that the dust on the transportation routes will be reduced by spraying water on the routes twice a day (Reference: AECOM Exec Summary, Mitigation Measures Pg 1-4). If the large vehicles only travel during these two time periods, that water application may be meaningful. If the project takes place during the hot, dry Summer, the actual transportation will raise such dust that there is no earnest attempt at alleviation the airborne Particulate Matter (PM) contained in such activity over dusty, dirt filled routes. PM 10 (respirable particulate matter) and PM 2.5 (fine particulate matter) causes severe respiratory damage, cardiovascular disease, and long-term systemic risks. This Particulate Matter is dangerous for both workers and students that may be near the construction site. Frequent watering and/or other

methods can be used to alleviate this disturbing result of frequent and heavy travel over dirt.

One article in IECA News Center states controlling "fugitive" dust is often a major source of air pollutants and a health hazard. It also states that applying water periodically to create adhesion between soil particles is often used but is short lived. It loses its effectiveness within the hour. There are other methods for "fugitive dust" control that should be utilized.

I50-5 (Cont.)

Air Quality is also affected by the greenhouse gasses emitted by large vehicles during construction (diesel gas driven), to include: PMs mentioned above, Nitrous Oxide and Carbon Dioxide, and others. This should be addressed in the Final Environmental Impact Report (FEIR).

I50-6

Addressing Effects of Working with Soil:

Soil is a living system. It is packed with life: worms, insects, fungi and microscopic bacteria. The biology inside healthy soil breaks down nutrients so plant roots can absorb them, while holding water and staying aerated.

Large equipment, and its vibration cause soil compaction, such that there are no air pockets, or space for any natural water to be absorbed into the soil and eventually added to the water table. Soil compaction decreases water infiltration, increases runoff, and restricts root growth. Compaction ensures long-term devastation to plant growth and drought-like dirt landscape, rather than the vibrant soil enhancement that currently exist on the campus grounds and near the American River. The soil habitat is reduced to non-life supporting dirt.

Mitigation measures should address this issue, with either upfront site planning or deep mechanical or biological restoration afterward.

I50-7

Addressing Noise and Mitigation attempts:

A new press box and public address system, resulting in increased noise, was addressed by Liz Bellas, Director of Regional Parks in her February 4, 2026 letter to the School District Construction & Modernization Director. "…increased noise contributes to habitat fragmentation and physiological stress while masking vital wildlife vocalization used for mating, territorial defense, and predator detection." The noise of a stadium to include shouts, cheers and loud bull horns and other

I50-8

noise makers will carry into the neighborhood – on both sides of the American River. Noise does not dissipate over water to the south side of the River – as water is much denser than air and noise will travel longer distances unimpeded. The appendix to the noise calculations is not useful to the public reader. It is too full of unexplained terms and jargon. The increased noise would be carried into hours of the night – a huge disruption to the nearby residents and wildlife of the area. As stated in the AECOMDEIR on page 4.3-18: The proposed project would result in new long-term noise sources including mechanical equipment, increase parking lot activities, project area traffic, and increased crowd, bleacher, band, and public address system activated during some (estimated to be approximately 13 new) events at the existing Raider Stadium.

I50-8 (Cont.)

Noise pollution is considered to be any unwanted or disturbing sound that affects the health and well-being of humans and other organisms. Sound is measured in decibels. Sounds that reach 85 decibels or higher can harm a person's ears. Loud rock concerts (110 – 120 decibels) can exceed this threshold. It can also impact the well-being of wildlife. Animals use sound for a variety of reasons, including to navigate, find food, attract mates, and avoid predators. Noise pollution makes it difficult for them to accomplish these tasks, which affects their ability to survive. (Ref: encyclopedia & National Park Service: NPS.gov/subjects/sound/index.html)

I50-9

According to the information in the DEIR, the stadium is desired for an additional five-eight football games, up to four school assemblies or community events, and one graduation to be scheduled. Does the cost-benefit analysis support such a project for such a limited, unnecessary need? Possibly there will be concerts and celebrations to be added to this venue that will make the stadium more "cost effective;" however, in this case, we are inviting more disruption into this quiet residential and riparian areas.

I50-10

I understand the joy and pride that comes with a new stadium that supports your athletic program, special school gatherings and recreational events. However, the placement of the stadium is what is the biggest environmental threat – regardless of the requirements set in the DEIS requirements. Not only is there a large land mass involved, there are on-going impacts of soil impaction, noise, light, air quality and vibration disturbances to a very beautiful parcel of land that has been preserved for public used – The American River Parkway.

I50-11

This is a facility for the convenience of field athletics, and possibly for special ceremonies and perhaps to generate money for other events. However, the stadium would not support all the athletics provided in the high school – swimming, gymnastics, basketball, tennis, volleyball. Nor will it support the discoveries available along the American River Parkway that truly support your strong involvement in environmental studies. I50-12

I recommend a fully vetted cost-benefit analysis that justifies this facility with the associated disruption (some permanent) to the local community. These few students need this structural support more than the school needs book, nutritious services, top-notch teachers and unique teaching opportunities provided by your nearby wild and scenic river? I50-13

This is a questionable project, especially now, in this rocky energy-resources supply/pricing/political market. Diesel fuel is now about $9/gal in California – with no stability or set pricing in sight. It is also a time when environmental protection laws are being eroded – and such a project could result in permanent damage, without sufficient oversight. Hopefully, there will be safeguards built into the contract process to protect the Board, the school and the local community against varying costs and inconsistent requirements. I50-14

Biggest Issue: I50-15

The largest problem by far is the degradation to the American River Parkway. In speaking to some of the Rio Americano students, I understand that there are classrooms in which the students can view the levee that borders the river and Parkway. I have met students that have provided exalted explanations of what they get from the location of their high school, so close to the American River Parkway. It is the only state and federally designated Wild and Scenic River in the US that travels through an urban area, and is recognized as having Outstanding Remarkable Values. The natural gifts of this environment included wildlife, 200 species of birds, unique soil biomes, variety of trees, a multitude of native plants, clear water, fresh air and the unique fish that thrive in this river. Your students are in such a unique environment that provides much respite and mental health breaks to their long days of school. The learning environment for your future biologists, hydrologists, ornithologists, environmentalists…is a very hands-on opportunity. There is so much compelling evidence of why there should be dedicated schools

for the study of rivers and their environments, “By understanding the science, we learn to love rivers for what they are. We forget that the water cycle and the life cycle are one.” Jacques Yves Cousteau. “All life depends on water, and it is with rivers that the land, and land creatures including humans, are placed in contact with water, nearly everywhere. Our quality of life, and the continued existence of the ecosystems that we are a part of depend on the action of rivers. They represent cleansing, renewal, replenishment, relief, and life.” I50-15 (Cont.)

Rio Americano is located in such a unique riverine area as to provide privileged access to areas that support many of the natural sciences. Rio Americano is third in the competitive standing of high schools in the San Juan School District for STEM, Math and Science. It is known for having environmental science studies. This school has a unique access and affordability of working in an outdoor environment that supports so many science pursuits – unlike any high school campus in the region. In fact, many other schools that provide any outdoor education programs need to access transportation needs, overnight accommodations and safety considerations just to plan such an adventure that is readily available to the Rio Americano students when they walk out their back door. I50-16

There are so many environmental attributes that will be harmed by the on-going construction and maintenance of such a facility. The location of the facility is the most thoughtless aspect of the stadium, when considering environmental harm. Lights, road work, noise, air quality, vibration, on-going traffic, litter and crowd behavior can deteriorate this pristine, natural, quiet and serene environment, lodged next to the American River. Not only during the construction phase, as addressed in the DEIR, but the on-going operations will provide much of the same deterioration of this riparian habitat. The size of a crowd and the noise for the big events makes me cringe. If you decide that the stadium is the best path for this school, please consider placing it in another area, away from the American River Parkway. I50-17 I50-18 I50-19

Nancy Kniskern
College Greens East
October 15, 2026

Letter I51

From:	Laura Langham
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 6:08:46 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I51-1 I51-2 I51-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I51-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I51-5

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I51-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.
Incomplete Environmental Baseline and Project Description – I51-7

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I51-8
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I51-9

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I51-10

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I51-11

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I51-12

Thank you for your consideration,

Laurie Langham
laurielangham@sbcglobal.net

Letter I52

From:	Linda L.
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 4:07:32 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I52-1 I52-2 I52-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I52-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I52-5

I have further outlined my concerns about the project and the DEIR below. I52-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I52-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I52-8

Incomplete Environmental Baseline and Project Description – I52-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I52-10 I52-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I52-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I52-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I52-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I52-15

Thank you for your consideration,

Linda Larson

Letter I53

From: Cathie LaZier
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 3:11:31 PM

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You will be receiving this for many people because it states the fact much more clearly than many of us could manage on our own. But I strongly feel that these comments are correct. The American River Parkway is one of the jewels of Sacramento and we need to protect it and the wildlife using it. I53-1

To whom it may concern, I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I53-2 I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I53-3 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I53-4 Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I53-5 Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I53-6 I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. I53-7 Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I53-8 Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. I53-9 The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I53-10 • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I53-11 I53-12 • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I53-13 Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I53-14 Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I53-15 Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I53-16 Thank you for your consideration,

Cathie LaZier
5427 13th Avenue

Sacramento CA 95820

Letter I54

From: Gregory A Leafe
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Tuesday, September 29, 2026 1:48:00 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I54-1 I54-2 I54-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I54-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I54-5

I have further outlined my concerns about the project and the DEIR below. I54-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I54-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I54-8

Incomplete Environmental Baseline and Project Description – I54-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I54-10 I54-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I54-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I54-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I54-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. Current traffic patterns are heavy and incompatible with the neighborhood street plans. The addition of a stadium that would create large traffic surges would not only impact the neighborhood and air quality but also impact the potential ingress and egress of emergency vehicles. I54-15

Thank you for your consideration,

Gregory Leafe

Letter I55

From:	Michael Leaon
To:	mbassanelli@sanjuan.edu; Rio Americano; nicholas.arps@sanjuan.edu
Subject:	ARC Stadium DEIR
Date:	Friday, October 16, 2026 3:38:43 PM
Attachments:	ARC Stadium DEIR 10_16_26.pdf

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Please see the attached comment letter. I55-1

October 16,2026

To whom it may concern, I55-2

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I55-3 I55-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I55-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I55-6

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I55-7

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I55-8

Incomplete Environmental Baseline and Project Description – I55-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I55-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I55-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I55-12

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I55-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I55-14

Thank you for your consideration,

Signature: *Michael Leaon*
Michael Leaon (Oct 16, 2026 12:25:11 PDT)

Email: mleaon60@gmail.com

Letter I56

From: Marya Liberty
To: Rio Americano
Subject: Rio Americano stadium
Date: Friday, October 16, 2026 5:51:15 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I56-1 I56-2 I56-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I56-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I56-5

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I56-6

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky oriented design. I56-7

Incomplete Environmental Baseline and Project Description – I56-8

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I56-9

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008.

I56-9 (Cont.)

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using.

I56-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use.

I56-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.

I56-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

I56-13

Additionally, the location of this project is really impactful for the American River Parkway. The parkway is a gem and should be treasured and respected. The ongoing noise and lights that go with the stadium are not compatible at all with the parkway native inhabitants. The parkway is already a sliver of natural area in Sacramento. Let us be respectful and protect what small natural areas we have.

I56-14

Thank you for your consideration,

Marya Liberty
Native Sacramentan

Letter I57

From:	E L-C
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 2:25:57 AM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

Thank you for your consideration, Erika Lynn-Croy

I57-1
I57-2
I57-3
I57-4
I57-5
I57-6
I57-7
I57-8
I57-9
I57-10
I57-11
I57-12
I57-13
I57-14

Letter I58

From: Nancy Mackenzie
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 7:00:35 PM

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To whom it may concern,

I am a practicing environmental planner with over 30 years experience with CEQA and NEPA and working with project proponents and resource agencies to avoid, minimize or mitigate impacts on capital improvement projects. I am submitting this comment letter to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I58-1

I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I58-2

I understand that there is not an updated evacuation plan and no security, which compromises the safety of students, parents, staff and attendees. I58-3

The proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I58-4

The District, within the last ten years, has already added a track field at the stadium's proposed location. I58-5

The District should use Rio Americano's location at the American River Parkway to enhance its science curricula, using the Parkway as an educational tool. I58-6

Where the DEIR falls short: I58-7

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I58-8

Incomplete Environmental Baseline and Project Description –

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions. I58-9

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I58-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I58-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it would impact wildlife, habitat, and recreational uses. I58-12

Cumulative impacts – the separately and improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I58-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I58-14

Thank you for your consideration,

Nancy and Stewart MacKenzie
5747 state avenue (River Park)
Sacramento, CA 95819

Letter I59

From:	Dennis Mangers
To:	Rio Americano
Subject:	Rio stadium improvement
Date:	Tuesday, September 8, 2026 8:32:56 PM

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This is to notify you that we have read the EIR report for the proposed Rio stadium improvement project and we approve of the entire plan. I59-1

We live around the corner and love the sound of young people cheering and the band playing at various sporting events. The relatively new performing arts venue and an improved stadium will greatly enhance the high school experience at Rio for both current and future students.

Respectfully

Dennis Mangers and Michael Sestak

1017 Harrington Way, Carmichael 95608-6166

Dennis Mangers

dennis@dennismangers.com

916-425-8167

Helping young performing artists is one of my biggest priorities!

https://www.sacregcf.org/grant/dennis-mangers-fund-for-young-performing-artists/

My featured profile in the May 2025 issue of:Comstock Magazine

https://online.fliphtml5.com/yzguw/pyun/#p=25

KVIE television PRIDE documentary on Sacramento's LGBT community

YouTube link

Letter I60

From: LMarkoff
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu

Subject: Comment for Draft EIR of the Rio Americano High School Stadium Project
Date: Thursday, October 15, 2026 11:42:38 AM

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Dear Superintendent Bassanelli, Director Arps, and anyone else involved in the Rio American HS Stadium Project, I60-1

Although I understand the District's desire for a stadium at every high school, **the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium.**

I ask that you proceed with much thought and caution regarding the possible stadium construction at the school. It includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues, which should give everyone pause. I60-2

I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. Wildlife is already under siege from development, this will only make it worse. I60-3

In addition, this proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Ignoring this is a tragedy waiting to happen. I60-4

Where the DEIR falls short: I60-5

Event Noise – Noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. **The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.** I60-6

Incomplete Environmental Baseline and Project Description – I60-7

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I60-8

• The existing baseline conditions should not include portable diesel lights that the District has recently started using. I60-9

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. **As someone whose family members visit the Parkway on a daily basis, I know that habitat and wildlife are extremely important. In today's increasingly stressful world, humans need a place where they can get back to Nature. Please do not ignore that, please do not brush those concerns aside.** I60-10

Cumulative impacts – The separately and improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I60-11

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. **We need more public transit, rather than swarms of cars clogging the area.** I60-12

Please proceed carefully and consider all facets of this proposed project.

Thank you,

Lorraine Markoff
8061 Poulson St.
Citrus Heights, CA 95610
canyoneagle@mycci.net

Letter I61

From:	Rachel M Markoff
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 3:58:19 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I61-1 I61-2 I61-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I61-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below. I61-5

Where the DEIR falls short: I61-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I61-7

Incomplete Environmental Baseline and Project Description – I61-8

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I61-9
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I61-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I61-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I61-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I61-13

Thank you for your consideration,

Rachel Markoff

Letter I62

From:	Barbara McKnight
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu; babsdugal@gmail.com
Subject:	stadium
Date:	Wednesday, October 14, 2026 10:54:30 AM

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Good Day

Rio Americano does not need a stadium. There is a perfectly good one at El Camino HS, and the funds that would be used to build a stadium can be used to update the facility at El Camino. Since San Juan USD is a low income school district, where are the funds coming from? Are taxes going up? Why does the district need to do this near the American River parkway? Why can't a stadium be built at a school that has the space, without attacking the surrounding landscape? Bella Vista has a stadium and Mesa Verde, Casa Roble or Del Campo have ample room to build one. Additionally, a stadium will adversely affect property values in the surrounding RESIDENTIAL neighborhood be lowering values by anywhere from 3-8% or more. This becomes a disclosure item for someone listing their home for sale. And many of the homeowners in the area may not have kids attending Rio at all. Lastly, this will severely negatively affect the surrounding homes with increased traffic, noise, disruption, and above all trash. My family still owns the home on Gary Way where I lived when I attended Rio 74-77, and the Jesuit mess is increasing traffic and parking all the way up there. This is not a good use of public funds, nor does it reflect a proper stewardship of the Parkway, the river and the nature that is so close to the school.

I62-1

I62-2

Sincerely,
Barbara McKnight nee Grey
Alumni 1977

Letter I63

From: Construction
To: Rio Americano
Subject: FW: Comments Re: Americano High school detriment to river project.
Date: Thursday, October 15, 2026 2:57:59 PM
Attachments: image001.png

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Please include, thank you.

Cassandra Baumgart
Administrative Assistant to
Frank Camarda, Chief Operations Officer
San Juan Unified School District
916-971-5740 | VOIP: 405107

San Juan Unified SCHOOL DISTRICT

From: MHI Gtkpr <mhigtkpr@gmail.com>
Sent: Wednesday, October 14, 2026 8:33 PM
To: Construction <construction@sanjuan.edu>
Cc: Peter Spaulding <petenyvtca@comcast.net>; Betsy Weiland <flweiland@yahoo.com>
Subject: [EXTERNAL] Comments Re: Americano High school detriment to river project.

You don't often get email from mhigtkpr@gmail.com. Learn why this is important

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Re-sending comments and concerns, please confirm receipt. Thank you.

Lisa Merritt MD

Dear Mr. Arps and San Juan Unified School District Representatives,

I am writing as a longtime resident of the American River community, a physician specializing in sports and catastrophic injuries concerned with the health effects of environmental exposures, and a lifelong advocate for athletics and opportunities for young people. I just received correspondence regarding the Rio Americano project. I63-1

I want to begin by emphasizing that I strongly support high-quality athletic facilities for students. As a former high school MVP athlete who helped establish my school's girls track

team and subsequently competed as a nationally ranked collegiate athlete, I understand firsthand the extraordinary role that athletics can play in developing health, confidence, discipline, teamwork and leadership. I63-1 (Cont.)

My concern is not with improving athletic opportunities for all Rio Americano students. Rather, it is whether **the scale and intensity of this particular expansion are appropriate at this unusually environmentally sensitive location**, immediately adjoining established residential neighborhoods and the American River Parkway. I63-2

The District's Notice of Preparation confirms that the school is bordered by residential areas and that the American River Parkway lies immediately to its south. The proposal would add four approximately 80-foot permanent light standards , six additional pathway lights, expanded bleacher seating accommodating approximately 2,500 people, a new press box, and an upgraded public-address system.

These are substantial changes in the intensity and potential hours of use of the site. Indeed, the District's biological assessment states that installation of permanent lights and other improvements is expected to result in **an increase in activity after sunset.**

Noise and quality of life

Residents across and adjacent to the river can already hear amplified announcements, cheering, whistles and other stadium activity during practices and games. The proposed increase in seating capacity, upgraded PA system, permanent lighting and greater ability to conduct evening activities raise legitimate concerns about substantially greater frequency, duration and intensity of noise. I63-3

I appreciate that the District has identified noise and vibration for further EIR analysis, including construction noise, operation of the upgraded PA system, event-related traffic, and comparison with existing ambient noise conditions.

I ask that this analysis include **actual measurements at nearby residences and across the river**, including evening measurements during existing stadium events, rather than relying primarily upon modeling or measurements taken only on school property.

The EIR should also evaluate reasonable restrictions on amplified sound, evening hours, frequency of nighttime events, lighting hours and special/community events, sound barrier walls or other factors as potential mitigation measures. I63-4

Light pollution and the American River Parkway

Four permanent stadium poles approximately 80 feet high (similar in height and intensity to Sutter Health Park Downtown) represent a significant alteration in nighttime illumination immediately adjacent to the bucolic American River Parkway corridor. I63-5

This is not simply an aesthetic concern. Artificial nighttime lighting can affect wildlife behavior, feeding patterns and habitat use. The District's own biological study acknowledges that artificial lighting may discourage foraging by light-avoiding bat species and that early evening the period during which stadium lighting and noise would occur is prime foraging I63-6

time for many bats. This could in turn adversely impact management of vector borne diseases recently on the rise like west Nile Virus.

Importantly, the surveys actually **confirmed bat foraging activity at and adjacent to Raider Stadium**, as well as activity consistent with bats emerging from a roost somewhere in the vicinity.

Although the consultant ultimately characterized the impact as less than significant, the documented presence of wildlife activity reinforces the importance of protecting the interface between this developed campus and the Parkway.

I63-6 (Cont.)

I **therefore request careful evaluation of light spill, sky glow and illumination extending toward the river corridor, including consideration of lower-height fixtures, shielding, directional lighting, automatic shutoffs and firm limitations on hours of operation (There is estimate of some events going until 11pm)**

I63-7

Traffic, air quality and neighborhood impacts

A stadium accommodating approximately 2,500 people also means substantially increased movement of vehicles through a predominantly residential area and increased idling of engines while waiting in lines to enter or exit the venue.

This deserves particular scrutiny because the impacts do not end at the school property line. Increased event traffic means vehicle exhaust, particulate matter, braking and acceleration at stop signs, idling, parking demand, pedestrian conflicts and noise distributed throughout surrounding residential streets.

I63-8

The EIR appropriately proposes examining transportation under existing, project and cumulative conditions. However, I am concerned that **air quality has already been categorized in the Initial Study as having no impact or a less-than-significant impact**, rather than being among the subjects proposed for the focused EIR.

The appendices themselves demonstrate why this deserves another look: the modeling identifies construction and operational emissions, with mobile sources responsible for the overwhelming majority of modeled operational emissions.

For those of us already living within the broader Highway 50 transportation corridor, cumulative exposure is particularly relevant. I therefore request that the District consider **localized exposure**, rather than simply whether project-wide emissions cross a regulatory threshold.

As a physician, I am particularly concerned about people who may be more susceptible to environmental exposures, including children, older adults and individuals with respiratory, cardiovascular or other chronic health conditions. There is an elementary school across the river from the proposed site. O.W. Erlewine Elementary school has about 300 students,TK(pre school) - 6th grade. It is a Title I, and Title III School representing a vulnerable student population, adding to a sense of prioritizing needs of privileged vs less privileged student populations.

I63-9

Construction impacts

The project anticipates approximately three to four months of demolition and construction during summer 2027, with construction occurring approximately 7 a.m. to 4 p.m. on weekdays and construction traffic accessing the site from American River Drive.

That means diesel equipment, construction traffic, dust, excavation and noise during precisely the season when nearby residents frequently use outdoor spaces and the Parkway. The American River Parkway is one of the most frequently visited venues in our area.

I request specific enforceable mitigation measures addressing dust suppression, diesel idling, equipment emissions, construction traffic routes and hours, and monitoring of particulate matter where appropriate.

I63-10

Cumulative environmental impacts

I believe this may be one of the most important issues for the EIR.

This project should **not be evaluated environmentally in isolation** from other reasonably foreseeable activities affecting the American River corridor.

Residents are already facing concern about proposed levee work and potential removal or disturbance of substantial numbers of mature trees along portions of the American River. Trees and riparian vegetation provide shade, temperature moderation, habitat, carbon sequestration, particulate filtration, noise buffering and an extraordinary quality-of-life resource for the entire Sacramento region.

The District itself states that the EIR will examine direct, indirect, cumulative and growth-inducing effects.

Accordingly, I request meaningful consideration of cumulative impacts upon the Parkway environment from this project together with other reasonably foreseeable construction, vegetation removal, transportation and infrastructure projects affecting this river corridor.

I63-11

Public health and environmental assessment

I was also surprised to find that the modeling appendices state that **no Health & Equity Measures were selected, the Health & Equity Evaluation Scorecard was not completed, and no Health & Equity Custom Measures were created.**

While this may not be required for the particular modeling exercise, I believe it underscores the value of looking beyond regulatory thresholds toward the lived health effects of cumulative noise, light, traffic, heat, particulate exposure and environmental disruption.

Environmental health is not simply a question of whether an individual pollutant exceeds a numerical threshold. It also involves cumulative exposure and the effect of environmental conditions on sleep, stress, respiratory and cardiovascular health, physical activity, cognition and overall well-being.**In addition, there is noted potential adverse impact on culturally significant locations.**

I63-12

I63-13

Athletics and equitable benefit to students

I would also appreciate greater clarity regarding **which students and athletic programs will benefit from this substantial capital investment.**

Much of the public discussion appears centered on football and stadium activities. As a former female high school and collegiate athlete, I would particularly like to understand how the project advances opportunities for **girls' athletics or other student needs, including those with disabilities? Will some funding be directed towards adaptive sports? Arts or other learning opportunities?**

Will the project improve track-and-field and or tennis facilities? Will female athletes and teams receive comparable improvements in practice conditions, competition opportunities, equipment or facilities?

If a major public investment is being undertaken in the name of enhancing the student athletic experience, its benefits should be evaluated broadly across the student population.

I63-14

Consider less environmentally intensive alternatives

Finally, I ask the District to take seriously CEQA's requirement to examine reasonable alternatives rather than treating the currently proposed design as inevitable. The District's Notice specifically invites alternatives capable of reducing or avoiding potentially significant environmental effects.

That should include consideration of a **smaller-scale alternative** that improves the existing athletic facility without transforming its intensity of use, for example, more limited seating expansion, less intrusive lighting, preservation of existing nighttime limitations, restrictions on amplified sound,sound walls, fewer large community events, and targeted improvements to track-and-field and other student athletic facilities.

I63-15

I would also encourage the District to consider whether events requiring crowds approaching 2,500 people are better accommodated at facilities already designed and situated for that intensity of use.

I63-16

Conclusion

Rio Americano High School occupies an extraordinary location. That is an asset to the school, but it also carries a responsibility.

The American River Parkway and its riparian environment cannot simply be recreated once degraded. At the same time, surrounding residents should reasonably be able to expect that expansion of a public facility embedded within a residential and environmentally sensitive area will occur with careful consideration of its effects upon their health, homes and quality of life.

I therefore respectfully request that the District **reconsider the proposed scale of the**

I63-17

stadium expansion and fully evaluate a less intensive alternative, while undertaking rigorous analysis of noise, nighttime lighting, wildlife, traffic, localized air quality, construction impacts, public health and cumulative impacts upon the American River corridor. I63-17 (Cont.)

I strongly support investing in our young people. I believe we can provide excellent facilities and opportunities for Rio Americano students **without unnecessarily compromising the wonderful natural and residential environment in which their school is fortunate to be located.** I63-18

Thank you for considering these comments and for the opportunity for community participation as things evolve.

Sincerely,

Lisa A. Merritt, M.D. FAAPMR

Executive Director, Multicultural Health Institute

Clinical Professor, UCDH

Long time La Riviera College Greens Resident/ Homeowner

--

Sarasota Community Action COVID Dashboard: https://resiliencesystem.org/dashboards/sarasota-county/

Multicultural Health Institute
1781 Dr. Martin Luther King Way,
Sarasota, Florida 34234

2443 Fair Oaks Blvd #168
Sacramento, California 95825
Office: 941-706-3362 | Fax: 941-225-8198
www.the-MHI.org | Facebook

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Letter I64

From:	Laura M
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 6:39:14 PM

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To whom it may concern,

I would like to express my concerns regarding the proposed stadium construction at Rio Americano High School. This letter is based on a template that was shared with me, and I urge you to read it in its entirety, as I have edited it to add my own thoughts and concerns. I64-1

I believe I am uniquely qualified to comment on this matter. I attended Rio Americano in the late 1970's and grew up in a house on the banks of the American River. Rio was and is special because of its location. It integrates with the neighborhood and does not cause undue disruption to residents and wildlife. I64-2

The district does not *need* a stadium at every high school (I believe this is more a "want"). The proposed site at Rio Americano alongside the state-protected American River Parkway is not suitable for a high-intensity sports and events stadium, which is why none has ever been built there. The recently added track field is an appropriate use of the location, and needs no expansion. Students can--and have for years--traveled to other stadiums for their high-intensity sports and events. I64-3

Further concerns about the project and the DEIR: I64-4

Event Noise – Noise pollution was identified as significant and unavoidable even after mitigation. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I64-5

Lighting – Glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor, as well as the backyards of the million dollar (plus) homes next to the campus, will also be significant and unavoidable. I64-6

Notifications - Have the homeowners adjacent to the campus for at least a mile in all directions been notified by direct mail using property ownership records? Has everyone who will be impacted by this been made aware of the possibility? I64-7

Incomplete Environmental Baseline and Project Description – I64-8

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I64-9 I64-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I64-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I64-12

Cumulative impacts – The separately improperly-approved 90-foot cell tower must be analyzed together with stadium construction and operations. I64-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. The suggested unsecured, offsite parking is insufficient. I64-14

In conclusion, the location of a high-intensity sports and events stadium on the campus of Rio Americano will disrupt the neighborhood and wildlife along the river. The project should be denied and the funds should be spent elsewhere to improve the campus and its educational offerings. I64-15

Thank you for your consideration,
Laura Mills
Rio Americano Class of 1980
Lifetime American River resident and parkway user

Letter I65

From:	Ilah Rose Minton
To:	Ilah Rose Minton
Cc:	Rio Americano
Subject:	Natural Rivers are What Make Sacramento Special
Date:	Saturday, September 26, 2026 2:18:45 PM

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To whom it may concern,

I would like to express my **concerns** regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I65-1 I65-2 I65-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I65-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I65-5

I have further outlined my concerns about the project and the DEIR below. I65-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I65-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I65-8

Incomplete Environmental Baseline and Project Description – I65-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I65-10

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008.

I65-10 (Cont.)

I65-11

- The existing baseline conditions should not include portable diesel lights that the District has only recently started using.

I65-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use.

I65-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.

I65-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

I65-15

Keep river areas natural and wildlife & pedestrian friendly! The river is a Sacramento treasure!

I65-16

Thank you for your consideration,

Ilah Minton

Letter I66

From: Janice Modin
To: Rio Americano
Subject: Public Comment Proposed Rio Americano Stadium
Date: Wednesday, October 14, 2026 5:05:24 PM

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To the Lead Agency and Decision-Makers,

I66-1

I am writing to express my opposition to the proposed sports stadium project at Rio Americano High School, particularly as it relates to the long-term impacts of nighttime lighting and noise pollution on the American River Parkway and its wildlife.
My concerns extend beyond the immediate effects on neighboring residents. The Parkway is a valuable natural corridor that provides habitat for wildlife in an increasingly developed landscape. Its nighttime environment is an important part of that habitat, and I am concerned that the proposed project would introduce recurring artificial light and noise into an area where darkness and relative quiet have ecological value.

I66-2

I am particularly concerned about the project's impacts on nighttime darkness. Artificial light at night is not simply a matter of visibility or inconvenience for nearby residents. It can alter the behavior of wildlife, disrupt feeding and movement patterns, interfere with navigation, and affect the natural cycles that animals depend on. Different species respond differently to artificial light, and the effects can extend beyond the areas directly illuminated by stadium fixtures.
For wildlife using the American River Parkway, preserving naturally dark conditions should be treated as an important environmental consideration, not merely an aesthetic preference. The quality of darkness matters. Light can travel beyond a project's boundaries, reflect off surrounding surfaces, create skyglow, and alter the nighttime environment even where direct illumination is limited.
I am concerned that the environmental review may not adequately capture the full extent of these impacts if it focuses primarily on direct glare or light trespass onto neighboring properties. A meaningful analysis must also consider indirect illumination, skyglow, the spectral characteristics of proposed lighting, and the cumulative effects of recurring nighttime activities near the Parkway and river corridor.
I request that the Final Environmental Impact Report (FEIR) meaningfully evaluate these effects and require the strongest feasible protections for the nighttime environment. Lighting should be designed according to the principles of DarkSky International, including fully shielded fixtures, careful control of light distribution, the lowest practical illumination levels, appropriate color temperatures and spectra, and strict limitations on operating hours. Lighting should be switched off when activities conclude, rather than remaining on unnecessarily.

These measures should be incorporated into enforceable project requirements, not left as voluntary recommendations. The analysis should also explain how compliance will be monitored and what corrective measures will be required if lighting exceeds established limits or causes unanticipated impacts. I66-2 (Cont.)

Noise is another significant concern. According to the environmental review, event noise remains a significant and unavoidable impact even after mitigation. This finding deserves serious consideration, particularly given the project's proximity to a natural corridor that supports wildlife. I66-3

Noise associated with stadium events does not affect only people living nearby. Repeated loud sounds can disturb wildlife, interfere with communication, trigger avoidance behavior, and disrupt activities such as foraging, nesting, and movement. The consequences will vary by species, season, and the characteristics of the noise, but these are precisely the kinds of impacts that warrant careful evaluation when a major venue is proposed near sensitive habitat. I am especially concerned that the project does not appear to include adequate measures to mitigate event noise. If the environmental review acknowledges that noise impacts remain significant and unavoidable, the response should not simply be to accept those impacts without fully examining whether a different project design or alternative could avoid or substantially reduce them. I66-4

The FEIR should identify the applicable requirements of the Sacramento County Noise Ordinance and clearly explain how the proposed project would comply during sporting events, amplified announcements, evening activities, and other anticipated uses. It should address how compliance will be assessed in practice, including where noise will be measured, what standards will apply, and how the project will be monitored and held accountable. I66-5

I also request that the FEIR evaluate feasible alternatives and additional noise-reduction measures, including restrictions on amplified sound, limits on event hours, and measures to reduce noise transmission toward the Parkway. If the proposed configuration cannot adequately protect the surrounding environment, a different alternative should be presented and evaluated. I66-6

One of my greatest concerns is the duration of these impacts. A stadium is not a temporary event or a short-term construction project. It is a long-lived facility that could generate recurring nighttime lighting and noise for decades. I66-7

Even if an individual event appears to have a limited effect, the environmental consequences must be considered in the context of repeated exposure over many years. A pattern of evening events, artificial illumination, amplified sound, and associated activity could become a permanent feature of the environment bordering the Parkway.

The FEIR should therefore evaluate the frequency, duration, and seasonal timing of anticipated events, rather than treating each event as an isolated occurrence. It should also consider the potential cumulative effects of recurring disturbance on wildlife that depends on the Parkway for habitat and movement through the region.

Long-term environmental protection requires more than a one-time assessment of whether a project can technically operate within specified limits. It requires consideration of whether the project will permanently change the character and ecological function of the surrounding natural environment.
Where significant impacts have been identified, I believe the burden should be on the project proponents to demonstrate that feasible alternatives and protective measures have been fully considered. I66-7 (Cont.)

I respectfully request that the lead agency address the following concerns before approving the project: I66-8
Conduct a more comprehensive nighttime lighting analysis that evaluates direct illumination, glare, skyglow, light trespass, and the spectral characteristics of proposed lighting, with particular attention to wildlife and habitat within the American River Parkway and river corridor.
Require the strongest feasible DarkSky-oriented lighting protections, including fully shielded fixtures, minimized illumination, appropriate spectral characteristics, enforceable operating-hour restrictions, and automatic shutoff when lighting is no longer necessary. I66-9
Provide a clear analysis of Sacramento County Noise Ordinance compliance, explaining how noise from stadium events and amplified sound will be measured, controlled, and monitored, including during evening activities. I66-10
Identify and evaluate additional feasible noise mitigation measures and project alternatives, particularly because event noise has been identified as a significant and unavoidable impact. I66-11
The FEIR should explain why less disruptive alternatives would or would not be feasible. I66-12
Evaluate long-term and cumulative impacts on wildlife, accounting for the repeated nature of stadium events, seasonal wildlife activity, and the potential for decades of recurring nighttime disturbance. I66-13
Establish enforceable monitoring and corrective-action requirements for lighting and noise, with clear performance standards and consequences if the project fails to comply. I66-14
I recognize that school athletic facilities serve an important community purpose. However, that purpose should be balanced against the responsibility to protect the natural environment surrounding the school. The presence of an existing school does not mean that every additional intensity of development or nighttime activity is environmentally inconsequential. The American River Parkway is a valuable natural resource, and protecting it means considering not only what people can see and hear during the day, but also what wildlife experiences after dark. Darkness and quiet are not empty spaces waiting to be developed. They are environmental conditions that many species depend on. I66-15
I urge the lead agency to take these concerns seriously, fully evaluate feasible alternatives, and ensure that the long-term ecological consequences of this project are not overlooked. I66-16
Thank you for considering my comments.

Sincerely,

Janice Modin
Arden-Arcade, CA

Letter I67

From:	Wendy Money
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 3:30:30 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I67-1 I67-2 I67-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I67-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I67-5

I have further outlined my concerns about the project and the DEIR below. I67-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I67-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I67-8

Incomplete Environmental Baseline and Project Description – I67-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I67-10 I67-11
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I67-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I67-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I67-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I67-15

Thank you for your consideration,

Wendy Money

This riparian area is very rich as the river braids throughout. Bats, salmon, western pond turtles, shore birds, waterfowl, and avian riparian specialists like Yellow Warbler, as well as essential predators (bobcat, foxes, and coyote) count on night and quiet to live their lives. They can't just stop eating or sleeping because it's game night. I67-16

Letter I68

From: Leslie Morelli
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: Keep American River Parkway natural and undisturbed
Date: Saturday, September 26, 2026 4:22:53 PM

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Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I68-1

To whom it may concern, I68-2

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I68-3 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I68-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I68-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for I68-6

a state of the art science program with the Parkway as the educational opportunity of a lifetime. I68-6 (Cont.)

I have further outlined my concerns about the project and the DEIR below. I68-7

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I68-8

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I68-9

Incomplete Environmental Baseline and Project Description – I68-10

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I68-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I68-12 I68-13

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I68-14

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.
Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

I68-15

I68-16

Thank you for your consideration,

Leslie Morelli

Letter I69

Carmichael Residents' Comment Letter DEIR Rio Americano Stadium Expansion

To: Rio Americano

Tue 10/13/2026 10:45 PM

Cc: Emily Giza; Karen Shelton; Patricia Furey

DEIR Comment Letter San Ju...
343 KB

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Report Suspicious

Dear Members of the Board of Education and District Planning Staff:

As residents of Carmichael, California, we submit the following attached comments regarding the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Improvements Project. Thank you in advance for your consideration. I69-1

Kind regards,

Loretta Moreno

October 13, 2026

San Juan Unified School District Planning & Property Management / Facilities Department Attn: CEQA Project Manager – Rio Americano HS Stadium Improvements

Subject: Comments on the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Improvements Project

Dear Members of the Board of Education and District Planning Staff:

The undersigned residents of Carmichael, California submit the following comments regarding the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Improvements Project. We seek to ensure the protection of the ecological integrity, scenic character, and recreational value of the American River Parkway (Parkway) as we consider any proposed project of this magnitude along the Parkway. I69-2

We recognize and appreciate Rio Americano's student athletes, coaches, and families. We also acknowledge the importance of modern, safe, and functional school facilities. However, the California Environmental Quality Act (CEQA) requires that project siting and environmental impacts be evaluated fully. The proposed conversion of a small daytime-use sporting facility into a 2,500+ seat illuminated stadium immediately adjacent to the state and federally designated Wild and Scenic American River Parkway presents potential direct and indirect environmental, recreational, and land-use conflicts that, as proposed with draft mitigation measures, were not adequately assessed and do not reduce impacts adequately. Given documentation in the DEIR and reflecting upon formal comments submitted by Sacramento County Regional Parks, the project's lighting, noise, and operational intensity are incompatible with this highly sensitive and valued wildlife and recreational corridor. I69-3 I69-4

Because the DEIR relies on an unstable project description, omits required impact analyses, and artificially limited its cumulative impacts analysis, we respectfully request that SJUSD revise and recirculate the DEIR pursuant to CEQA Guidelines § 15088.5. I69-5

1. Insufficient and Unenforceable Project Description (CEQA § 15124) I69-6

A clear and stable project description is foundational to CEQA. The DEIR does not meet this standard.

- The scope of "School Assemblies or Other School-Sanctioned Community Events" is undefined, leaving open-ended allowances for non-scholastic events, civic gatherings, and potential third-party uses. Pursuant to a direct conversation with Frank Camarda, the Chief Operations Officer for San Juan Unified School District, on October 12, 2026, the School District has not restricted activities in its project description that would limit the school to only those listed in Table 3-1 of the project description and there is no

restriction on the school district renting out the facility to, for example, youth sports, Special Olympics, or men's adult soccer activities (his examples) on top of regular activities slated to occur with newly enhanced facility capacity. The issue with this is that the DEIR does not evaluate the reasonably foreseeable additional events (and increased use of lights and amplified sound) above the baseline, nor does it properly acknowledge the likelihood that enhanced capacity will attract events to the school in the future (e.g., large track and field events that currently don't occur).

I69-6 (Cont.)

- No *enforceable* mechanisms-such as covenants, reporting protocols, or administrative controls-are provided to ensure compliance with described event frequency, noise limits, or operational restrictions. CEQA requires a stable project description and enforceable mitigations.

I69-7

- The analysis focuses narrowly on night varsity football games while discounting and omitting mitigations around daytime track meets, band practices, weekend tournaments, and amplified sound activities that would realistically occur or increase throughout the year.

I69-8

2. Aesthetic Resources Inadequately Assessed

I69-9

Parkway Viewshed Impacts Are Incorrectly Dismissed (CEQA Appendix G, Section I)

The DEIR asserts that the stadium will not be visible from the Parkway due to the levee. This is factually inaccurate.

- First, the levee crown is a heavily used public recreation corridor. Further, whether on the levee or the Jedidiah Smith paved pathway, four 80-foot light poles, elevated press box structures, and expanded grandstands will intrude directly into foreground views.

- Introducing large-scale, industrial lighting and architecture will be directly visible to parkway users and sensitive wildlife, with impacts on the natural visual character of a state- and federally protected scenic river corridor and this should be analyzed in the report and corresponding mitigation measures and alternative analyses.

I69-10

Light and Glare Impacts Not Effectively Avoided /Mitigated (CEQA Appendix G, Section I)

I69-11

We acknowledge and appreciate the project proponents' effort to comply with Dark Sky standards. That said, even with modern fixtures, high-intensity lighting adjacent to riparian habitat produces unavoidable environmental effects.

- Seasonal tule fog and atmospheric moisture amplify skyglow through scatter and inversion-conditions directional lighting and shielding cannot resolve.

- Elevated lighting disrupts wildlife circadian rhythms, disorients nocturnal avian migrants, and affects foraging behavior. Sensitive biological receptors in the Parkway including migratory birds and other wildlife, such as mammals, will be able to see the lights directly along this narrow section of parkway corridor. I69-12

- Furthermore, Dark Sky protocol for compliance is a two-phased process, not just one phase as proposed in the mitigation. The mitigation proposes certification prior to construction, however fully Dark Sky compliant means field verification occurs by Dark Sky technicians after construction is completed. Read more here: https://darksky.org/what-we-do/darksky-approved/outdoor-sports-lighting/. Not only stadium lights but all access lights to arrive at the stadium should be made to be Dark Sky compliant to reduce impacts to less than significant. This is a dark sky corridor along the Parkway and very important wildlife corridor. I69-13

3. Biological Resource Analysis Inadequately Assessed (CEQA Appendix G, Section IV) I69-14

The DEIR inappropriately confines biological impacts to construction disturbance, ignoring long-term operational effects of project operations, both direct and indirect, on the American River Parkway. As stated by Sacramento County Parks, this section of the American River Parkway is one of the narrowest sections, therefore increasing the importance of project mitigations and avoidance measures to reduce impacts to wildlife inhabiting this portion of the parkway. This especially considering existing high intensity uses up and down the river, described above.

- Wildlife regularly moves between campus edges and riparian woodlands; the levee is not a biological barrier for the project.

- The Parkway supports special-status species. The DEIR provides no empirical analysis of how episodic but regular bursts of high-intensity noise and lighting affect these species.

- The DEIR does not evaluate consistency with policies protecting state and federally designated Wild and Scenic river systems. I69-15

4. Recreation Impacts Are Omitted (CEQA Appendix G, Section XVI) I69-16

CEQA requires evaluation of whether a project will degrade recreational resources and this was not evaluated in the DEIR.

- High-decibel announcements, amplified music, and higher frequency and intensity crowd noise will diminish the tranquil recreational experience sought by hundreds of thousands of Parkway visitors and wildlife inhabitants annually.

- The DEIR does not adequately analyze the likelihood of nighttime pedestrian and bicycle ingress via unlit Parkway trails and levee paths, nor the associated impacts to wildlife at nighttime hours. I69-17

5. Noise Analysis and Mitigation Inadequately Assessed (CEQA Appendix G, Section XIII) I69-18

The DEIR's "Less than Significant with Mitigation" conclusion is unsupported.

- Mitigation focuses on PA speaker orientation, that while appreciated and laudable, ignores the loudest and unconstrained elements: marching bands, drumlines, amplified music, and thousands of spectators.
- The DEIR does not model sound propagation over open water and floodplains, where acoustic energy travels farther under inversion conditions. I69-19
- Daytime events remain unconstrained and unmitigated as proposed. Only nighttime activities are regulated and at that, have unenforceable proposed mitigations as written. I69-20

6. Cumulative Impacts Artificially Constrained (CEQA § 15130) I69-21

The DEIR fails to consider cumulative effects along a continuous ecological corridor.

- Existing high-intensity use facilities near or immediately adjacent to the Parkway, beyond Jesuit High School, include the Sheriff's Training Center, Cordova High School and Hagan Park, as well as the new US Army Corps (USACE) Contract "3B" Project, all within 2-3 miles of the proposed project site. These were not evaluated in the context of the cumulative effects on the parkway's wildlife inhabitants and recreational users, in terms of direct and indirect added contributions of use, noise, and light on biological, aesthetic and recreational impacts that should all be evaluated in detail with associated mitigation measures or alternatives analyses.
- Approving additional intensive uses at this sensitive location compounds encroachment and sets an adverse precedent for Parkway degradation. At a minimum the environmental analysis must study and disclose these impacts and make every effort to mitigate them in authorizing new uses like this on the Parkway. I69-22

7. Environmentally Superior Alternatives Are Not Adequately Evaluated and Considered (CEQA § 15126.6) I69-23

Viable, cost-effective, and feasible alternatives exist that would help avoid the most significant impacts. However, in conversing with Frank Camarda, the Chief Operations Officer for San Juan Unified School District, on October 12, 2026, when asked about the viability of Alternative 2, he plainly stated there "is no way the site can be moved" from where it is proposed. CEQA disallows alternatives analyses that are not considered viable by the project proponent.

- **El Camino High School** provides a current, functional, non-riverfront venue for varsity competition, eliminating all Parkway impacts. I69-24

- **Alternative 2** offers a viable opportunity to maintain a functional, non-riverfront venue for varsity competition at the High School location, substantially reducing the most severe Parkway impacts identified in the DEIR. The analysis of Alternative 2 overstates construction-related effects on an already disturbed and developed site, creating an imbalance in how feasibility is characterized. If the District concludes that Alternative 2 is infeasible due to potential effects on the surrounding neighborhood, then the same level of concern must be applied to the far more sensitive American River Parkway and its wildlife inhabitants. CEQA requires consistent weighting of environmental and community impacts; the Parkway's ecological and recreational resources warrant equal, if not greater, consideration in the context of existing and reasonably foreseeable impacts in close proximity up and down river along this fragile Parkway corridor. I69-25

    - It should be noted that Alternative 2 is not considered viable because Mr. Camarda noted in the last 5 years, Rio Americano High School has spent upwards of $8 million on the current track and field upgrades, and the new upgrades and expansion would double that cost to total $16 million- this, despite noting a multi-billion dollar maintenance backlog facing the San Juan School District. I69-26

Conclusion I69-27

We support Rio Americano's students and value strong public schools. At the same time, we are stewards of the American River Parkway-a regional ecological treasure that cannot well withstand ongoing cumulative urban encroachment. The DEIR must adequately disclose, work to avoid, and mitigate significant impacts associated with siting a stadium immediately adjacent to this protected corridor.

While we appreciate this first attempt at analysis, we respectfully request that SJUSD withdraw the current draft and prepare and recirculate a revised DEIR that resolves these issues detected, and evaluate feasible alternatives that protect both student athletics and the Parkway. I69-28

Respectfully submitted,

Loretta Moreno
Patty Furey
Emily Giza
Karen Shelton

Of Carmichael, California

Letter I70

From: maureen morris
To: Rio Americano
Subject: Very excited about the new stadium
Date: Wednesday, September 2, 2026 5:40:35 PM

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Report Suspicious

Was very excited to see the drawing and detailed plan for our community to finally get a stadium that matches our school and community spirit. I70-1

I have kids that have and will graduate from Rio. Gathering for events at our new stadium will bring so much joy and happiness to all

Kids need this. They need healthy environments to come together.

I can’t wait to see this approved and in action!!

Letter I71

From:	Polly Murphy-Jones
To:	Rio Americano
Cc:	nicholas.arps@sanjuan.edu; mbassanelli@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 5:11:10 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I71-1 I71-2 I71-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I71-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I71-5

I have further outlined my concerns about the project and the DEIR below. I71-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I71-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I71-8

Incomplete Environmental Baseline and Project Description – I71-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone I71-10 I71-11

(PCCZ), and the American River Parkway Plan 2008. I71-11 (Cont.)
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I71-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I71-13
Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I71-14
Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I71-15

Thank you for your consideration,

[name]

Letter I72

From: Maren Nasseri
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Friday, October 16, 2026 7:59:52 PM

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To whom it may concern,

I72-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety.

I72-2

I72-3

I72-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium.

I72-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below.

I72-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

I72-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.

I72-8

Incomplete Environmental Baseline and Project Description –

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.

I72-9

- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008.

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I72-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I72-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I72-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I72-13

Thank you for your consideration,

[name]Maren.nasseri@yahoo.com

Sent from my iPhone

Letter I73

From: Geraldine Nicholson
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Thursday, October 15, 2026 7:00:22 PM

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To whom it may concern, I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I73-1 I73-2

This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I73-3 I73-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I73-5 I73-6 I73-7 I73-8 I73-9 I73-10 I73-11 I73-12 I73-13

Thank you for your consideration,
Geraldine Nicholson

Letter I74

From: Joy Nishida
To: Rio Americano
Subject: Fwd: Comments on the DEIR for the Rio Americano High School Stadium Project
Date: Monday, October 12, 2026 8:15:32 PM

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Sent from my iPad

Begin forwarded message:

From: Joy Nishida <jnishida@surewest.net>
Date: October 12, 2026 at 12:08:05 PM PDT
To: nicholas.arps@sanjuan.edu
Subject: Comments on the DEIR for the Rio Americano High School Stadium Project

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I74-1

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I74-2 I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway (Parkway). I74-3 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I74-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I74-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I74-6

I have further outlined my concerns about the project and the DEIR below. I74-7

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I74-8

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The lights may have a disorienting effect on migrating birds. FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I74-9 I74-10

Incomplete Environmental Baseline and Project Description – I74-11

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I74-12 I74-13

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I74-14

Aesthetics – The view from the crown of the flood control levee should also be evaluated as a view shed. From the levee crown, one sees the scenic vista of the Parkway and the view of the high school stadium, which will be altered with the structures, light poles, and cell phone tower going in. At a minimum, the light poles and cell phone tower will be seen down in the Parkway floodplain. I74-15 I74-16

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I have specific comments on the potential impacts of various special-status species and nesting birds. I74-17 I74-18

Monarch butterflies - There may be a slight potential for their presence. A home near the west end of the high school campus has planted native milkweed along the levee toe road which is used for egg laying by Monarchs. Also the eucalyptus trees along the border of the football field could potentially provide overwintering habitat for the butterflies. Though at this point, the potential is low, consider the fact that climate change has altered normal overwintering sites. I74-19

Crotch’s bumblebee - There is potential for the bumblebee to be present. Looking at the special-status species map in the DEIR, there are nearby occurrences of this species. Though regular maintenance through I74-20

mowing of the levees occurs, there are certain low-growing flowering plants which are utilized by and available for the bumblebee for foraging. These include dove weed (Croton setigerus), Spanish lotus (Acmispon americanus), redstem filaree (Erodium cicutarium), and bindweed (Convolvulus arvensis). These plant species occur on the landside levee adjacent to the project site. Other flowering plant species growing in the adjacent Parkway on the other side of the levee from the project site that are used by the bumblebee for foraging includes yellow starthistle (Centaurea solstitialis), poison hemlock (Conium maculatum), hairy vetch (Vicia villosa), Himalayan blackberry (Rubus armenicus), and tarweed (Centromadia sp.). I74-20 (Cont.)

Northwestern pond turtle - I have observed turtles that have made their way to the landside of the levee. There are openings in the fence via gates and holes dug by the ground squirrels in which the turtles could potentially enter the project site. I74-21

Valley elderberry longhorn beetle - the DEIR states that “additional blue elderberry shrubs may be present in riparian habitat in the Parkway”. Elderberry shrubs are definitely present in the Parkway. Many areas working the Parkway which are fairly close to the high school have been used as mitigation sites where many elderberry shrubs have been transplanted. One of the mitigation sites is ca. 250 meters SE from then football field and another mitigation site is 220 meters from the west end of the high school campus. I74-22

Nesting birds - Killdeer, which is protected by the Migratory Bird Treaty Act, have been seen nesting in the graveled areas on the landside north levee adjacent to the high school. There was also an incident when a killdeer made a nest on the east end of the football field prior to the addition of the artificial turf and track. I74-23

Migratory birds - Year round residents seen the lagoon area across from the high school include mergansers, mallards, wood ducks, cormorants, and Canada geese. During the fall migration, numerous species of other waterfowl such as American wigeon, cinnamon teal, northern shoveler, northern pintail, common goldeneye, ruddy duck, tundra swan, and snow goose. I74-24

Impact 4.2-4 - Project may interfere with the movement of native wildlife such as bobcats, gray foxes, and coyotes. These species have been seen traveling both sides of the north levee. I74-25

Wildland Fire Hazards – living near the Parkway, there have been a number of fires caused by homeless encampments and illegal fireworks. Though the levee maintenance includes frequent mowing of vegetation on the slopes to reduce the fuel, the fires that have occurred in the Parkway have been within the area with dense vegetation. Winds could carry embers over the levee to the urban area. It does not matter if the area is not considered a state responsibility area. Destruction of urban areas throughout California by fires has been evident and is an ongoing I74-26

threat which needs to be addressed in the FEIR. I74-26 (Cont.)

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. What will be done to avoid bird collisions with the cellphone tower and light structures? Will special color lighting and flashing needs to be taken into consideration. I74-27

It is a given that air quality and greenhouse gasses will increase during construction, but those are temporary impacts. The permanent impacts overall will contribute cumulatively with increased emissions from vehicles to attend games. Consider that Jesuit High School will be allowing females to attend what was an all male campus starting fall 2027. The vehicular traffic just for Jesuit High School could potentially double as a result. I74-28

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I74-29

Traffic will increase on American River Drive (ARD) as a result of the events at the proposed stadium. This will impact bicycle and pedestrian safety. The DEIR addresses installation of safety light poles on campus, but not at intersections along ARD. Estates Drive and ARD lack lighting so crossing ARD at night can be treacherous as many divers ignore the 4-way stop sign. With increased traffic due to events at the proposed stadium, the crossing of ARD at Estates Drive will become worse. This could be remedied with a button pushed by a pedestrian that causes a light to flash to signal the drivers that there is a pedestrian crossing the intersection. I74-30

Thank you for your consideration,

Joy Nishida

Retired Environmental Scientist

Sent from my iPad

Letter I75

From:	Joe O"Connor
To:	Rio Americano; Melissa Bassanelli Superintendent; Nicholas Arps Director Facilities Construction
Subject:	Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 10:39:43 PM

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Report Suspicious

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I75-1
To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I75-2 I75-3 I75-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I75-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I75-6
I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I75-7

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I75-8
Incomplete Environmental Baseline and Project Description – I75-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for

stadium use rather than generalized “typical” operating conditions. I75-9 (Cont.)

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I75-10

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I75-11

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I75-12

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I75-13

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I75-14

Thank you for your consideration,
Joseph E. O'Connor Jr.
2629 Escobar Way
Sacramento, CA 95827

Letter I76

From:	Karen Olson
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Monday, September 28, 2026 3:57:07 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I76-1 I76-2 I76-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I76-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I76-5

I have further outlined my concerns about the project and the DEIR below. I76-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I76-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I76-8

Incomplete Environmental Baseline and Project Description – I76-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I76-10 I76-11
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I76-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I76-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I76-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I76-15

Thank you for your consideration,

Karen Olson

Letter I77

From:	Susanna Park
To:	Rio Americano
Subject:	Response to the San Juan Unified School District Rio Americano High School Stadium Improvement Project Draft Environmental Impact Report.
Date:	Friday, September 11, 2026 12:27:25 AM

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Dear Sir/Madam

I am writing in response to the San Juan Unified School District Rio Americano High School Stadium Improvement Project Draft Environmental Impact Report. I77-1
A copy of this report was mailed to my home this past week since I live across the street from Rio Americano High School.

I am responding because I have serious concerns about the impact of stadium improvement to our neighborhood.
The renovation itself will create noise and congestion, but that would be temporary. I77-2
I worry about the sequelae.
The only reason to build a stadium that seats over 2000 people with lights that are 15 foot tall is because Rio Americano High School plans to host large sporting events in their school ground. I77-3
The school is located in an old residential neighborhood that would not be able to provide parking for 2000 attendees. I77-4
In addition, the neighborhood would not be able to handle the traffic jam that would result. I77-5
The tall lights that will be installed along the south side of the stadium will shine light to houses along the north side of the school and very disruptive at night. I77-6
The noise from the sporting event will also be disruptive to the neighborhood. I77-7

The idea of this Stadium Improvement is not new. It was proposed 15 years ago and the neighborhood voiced serious concerns then. I77-8
The same serious concerns remain.
Although we like to support Rio Americano School, the cost of having this stadium improvement to our neighborhood would be great.

Thank you for allowing me to share my concerns.

Susanna Park

Letter I78

From: Robin
To: Rio Americano
Subject: Rio stadium changes
Date: Wednesday, October 14, 2026 7:53:25 PM

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Just who will really benefit from these"upgrades"? Not young people who are suffering from our bad environmental policies.
Superintendents?
Coaches?
Parents? I78-1

Another selfish decision.

Sent from my iPhone

From: William C Pevec
To: Rio Americano
Cc: mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: Comments on DEIR for Rio Americano High School Stadium Improvements Project, State Clearinghouse Number 2026010094, Assessor"s Parcel Number 292-0210-019-0000
Date: Tuesday, October 13, 2026 9:24:26 PM
Attachments: Thank you for the opportunity to comment on the draft environmental impact report.docx

Letter I79

Thank you for the opportunity to comment on the draft environmental impact report (DEIR) for Rio Americano Sports and Events Stadium. I am a homeowner and tax payer in Sacramento County, in the San Juan Unified School District, trustee area 3. I79-1

The DEIR is deficient and incomplete. The areas of deficiency include: I79-2

1. The impact on wildlife of the American River Parkway (hereafter referred to as the "Parkway").
2. The impact on human recreation on the Parkway.
3. The impact on residential neighbors
4. Assessment of alternative options
5. Assessment of cumulative impacts

Impact on wildlife I79-3

The Parkway is a federally and state designated Wild and Scenic River. It provides unique riparian refugia, in the midst of urban and residential development, for numerous animal and plant species. Commonly seen species include mule deer, river otters, coyotes, wild turkeys, bobcats, bats, egrets, herons, and great horned owls. Also potentially present are several threatened and protected species, including the northwestern pond turtle, Swainson's hawk, white-tailed kite, song sparrow, and valley elderberry longhorn beetle.

Throughout the DEIR, impacts of the stadium on wildlife living on the Parkway is ignored. Impacts are not considered significant because "no sensitive habitats are located on or within 100 feet of the project site." While this may be legally acceptable, it is not biologically sound. A large, noisy, bright stadium and events center on the edge of the Parkway will definitely have deleterious effects on the wildlife that live there.

Impacts inadequately addressed include light, noise, and potential for unruly behavior on the Parkway. I79-4

The DEIR uses as existing baseline conditions the high-intensity, portable, diesel-powered lights that have been use only recently. The baseline should be set at the conditions before these portable lights were utilized. I79-5

The Joint IDA_IES designates the area of the Parkway south of the Rio Americano High School to be Lighting Zone LZ-0, which means the Parkway should have very low ambient light. While the DEIR proposes a DarkSky-oriented design, there is no guarantee that the installed lighting will meet the modeling standards. Bats are nocturnal feeders, and their foraging may be disrupted by the presence of stadium lights in their feeding area. This can also result in a loss of roosting areas. The DEIR admits that this is a "potentially significant impact," but offers no mitigation plan. I79-6 I79-7

Noise will also have a negative impact on wildlife. The studium is projected to have noise levels up to 93 dBA. Noise can profoundly affect the reproduction of birds, and will alter the behavior of most of the animals along the Parkway. The DEIR acknowledges that "anthropogenic noise can result in potential impacts to wildlife's survival and fitness." But without providing any supporting evidence, the DEIR concludes that the "impact would be considered less than significant." This concern cannot be simply ignored and must be addressed in the EIR. I79-8

The DEIR further downplays the risk of the stadium project to wildlife in the Parkway, with the caveat that "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." This ignores the cumulative impacts of levee reconstruction and other ongoing development, and is counter to the designation to protect the Parkway. I79-9

Impact on human recreation on the Parkway I79-10

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).

Throughout the DEIR, it is stated the stadium is visually blocked from the Jedediah Smith Memorial Bike Trail by the levee. This is not true, as documented in the attachments. Image one is from the bike trail just south of the stadium; image 2 is a telephoto image from the same location, clearly showing the top half of the goalpost uprights. Image 3 is from the bike trail a bit west from images 1 and 2; image 4 is a telephoto image from the same spot. In addition to the goalpost, the upper half of the scoreboard is clearly visible. Image 5 is from the bike trail west of images 3 and 4; image 6 is a telephoto from the same location. Most of the goalpost uprights are clearly visible. I79-11

The goalposts are 25-30 feet tall. The scoreboard is about 29 feet tall. The proposed press box would be 30 feet tall, and the railing on the roof would be at 34 feet elevation. The home bleachers would be 26 feet tall, and the light poles 80 feet tall. Current stadium structures taller than 20 feet are readily visible from the bike trail. The bleachers and press box would be clearly visible from the bike trail, and unequivocally would visually impact the Parkway. This is inconsistent with the County Zoning Code. Additionally, 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 I79-12 I79-13

the American River (Sacramento County 2024, page 2- 11). This stadium proposal is counter to that ruling. I79-13 (Cont.)

Placing the stadium directly adjacent the Parkway increases the possibility of unruly behavior and litter on the Parkway, particularly at night. The DEIR includes no mention of a plan for security to prevent unauthorized trespassing on the Parkway during evening events. A clearly defined security plan must be included. I79-14

Impact on residential neighbors

The DEIR describes noise measurements taken at El Camino High School during a Rio Americano High School football game. Noise levels were measured as high as 93 dBA, similar to a motorcycle at 25 feet (Temple U, Dept Civil Engineering; Federal Interagency Committee on Noise). The DEIR allows for noise levels of 70 dBA at residential property lines. However, Sacramento County policy mandates night time noise standards of a median of 50 dB and a maximum of 70 dB. The policy NO-15 further mandates "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." The DEIR describes site design efforts with the PA system, bleacher and ramp noise control "where feasible," restrictions on noisemakers, and limitations on amplified music and band activity after 10 pm. The bleacher and ramp noise control features must be defined in the EIR. No mitigation measures for crowd noise and band noise (before 10 pm) are offered. As noise policy thresholds will be exceeded routinely, and setbacks are not feasible, the EIR must include a plan must to add sound barriers. I79-15

Noise from parking is considered "insignificant." This conclusion is made without evidence. The noise from the parking lot must be evaluated and included in the EIR. I79-16

There is inadequate parking on the campus to accommodate the volume of cars for evening football games. The DEIR estimates that up to 620 cars would be parked on neighborhood residential streets. This could result in parking violations such as obstructed driveways and parking near corners that limit visibility. The DEIR describes no mechanism for parking enforcement; this must be included. I79-17

This uncontrolled parking, with a single designated crosswalk in the vicinity of the high school, also raises concern for pedestrian safety. A plan to address pedestrian safety must be included. I79-18

A left-turn queue of 1055 feet (0.2 mile) is predicted at the intersection of Saverien Drive with Fair Oaks Boulevard. This, along with the potential of illegal parking blocking driveways, without enforcement, raises serious concerns regarding emergency access. An emergency access plan must be included. I79-19

No plan is offered to manage any of the above concerns, other than a proposal to discuss with Jesuit High School the use of the Jesuit High School parking lots as overflow sites. A proposal to discuss is inadequate. A clearly defined overflow parking management system must be defined and documented, including the mechanism to compel drivers to use the alternative parking lots rather than residential streets. However, if simultaneous events occur at both high schools, such an overflow parking system becomes untenable. This must clearly be addressed, with a well-defined plan to avoid concurrent events at both high schools. I79-20

A clearly defined traffic management plan must also be included. This includes directing cars to the appropriate parking areas and managing traffic congestion to allow for emergency access and egress. I79-21

The DEIR states "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." Documentation as to how this would be accomplished must be provided. I79-22

Assessment of alternative options

The DEIR provides only a cursory assessment of the alternatives of continuing to use the stadium at El Camino High School, or using the Hughes or Hornet stadiums.

Any of these would avoid all of the negative impacts to the wildlife of the Parkway, to the recreation on the Parkway, and to the quality of life and safety of the residential neighbors of Rio Americano High School. These alternatives would also free up $10 million of District funds to use to address the greater than $40 million backlog of deferred maintenance at Rio Americano High School. Addressing this maintenance would enhance the safety and well-being of the students, and avoid the escalating costs of further deferral. I79-23

The DEIR also posits that vehicle miles traveled would be lower for events at Rio Americano High School than at El Camino High School, without providing any data to support this claim. The vast majority of students are driven daily to Rio Americano High School; to make the above claim, the EIR must provide data on where students live relative to the two high schools. I79-24

Assessment of cumulative impacts

The cumulative impacts of large capacity sports and events centers at two high schools (Jesuit and Rio Americano) less than a mile apart is not addressed. The impact of current events at both schools, particularly on traffic, parking, and emergency access is not addressed; a thorough assessment and management plan must be included in the EIR. I79-25

In fact, on pages 7-12 to 7-13, the DEIR states that if there were high-capacity events at both high schools, the congestion at Saverien Drive and Fair Oaks Blvd. would be alleviated by development of a use agreement for off-site parking at Jesuit High School. This clearly makes no sense. The EIR must describe a management plan to address traffic, parking, and emergency vehicle access in the event of concurrent events at both high schools. I79-26

The lower American River is a federal and state protected Wild and Scenic River. This is an irreplaceable asset. Once it is harmed, there is no going back. I79-27

This unique waterway in an urban and suburban area offers recreation that I enjoy daily, and is a jewel of the Sacramento region. Harm it, and our entire region is harmed.

Rio Americano High School has the opportunity to use this natural asset to enhance the education of its students. It can play evening football elsewhere, and all other sports in the current facilities, but no other high school has the opportunity to educate its students in a protected riparian habitat.

Rio Americano High School is the wrong location for a high-intensity stadium. The best option is to continue to use an alternative stadium for night-time football games. I79-28

If the district is to proceed, an Environmental Impact Report must be provided that includes enforceable measures to avoid or substantially mitigate the impacts of night-time lighting, noise, traffic, parking, security, and safety. Calling these impacts “less than significant,” or addressing them by stating a plan will be developed in the future is inadequate and unacceptable. I79-29

Respectfully,



William C. Pevec
831 Laverstock Way
Sacramento, California 95864
916-616-9530

I79-30



Image 1: Goalposts east from bike path.



I79-31

Image 2: Goalposts east [zoomed].



Image 3: Stadium and scoreboard from bike path middle.



Image 4: Stadium and scoreboard middle [zoomed].



Image 5: Backstop and goal post from bike path west.



Image 6: Backtop and goal posts west [zoomed].

Letter I80

From: Dara Pfeiffer
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: rio
Date: Saturday, September 26, 2026 6:16:53 PM

This Message Is From an Untrusted Sender
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Report Suspicious

- Melissa Bassanelli, Superintendent,
- Nicholas Arps, Director, Facilities Construction,

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I80-1

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I80-2 I80-3 I80-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I80-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I80-6

I have further outlined my concerns about the project and the DEIR below. I80-7

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I80-8
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that I80-9

complies with the maximum light reduction available through DarkSky orientated design. I80-9 (Cont.)

Incomplete Environmental Baseline and Project Description – I80-10

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized “typical” operating conditions.

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I80-11 I80-12

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I80-13

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I80-14

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I80-15

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I80-16

Thank you for your consideration,

Letter I81

From: sillylittlemama@icloud.com <sillylittlemama@icloud.com >
Sent: Tuesday, September 22, 2026 5:37 PM
To: info@sanjuan.edu; mbassanelli@sanjuan.edu; nroux@sanjuan.edu; boardmembers@sanjuan.edu
Cc: trent.allen@sanjuan.edu; McFerran, Suzanne <Suzanne.McFerran@aecom.com >; construction@sanjuan.edu; nicholasarps@sanjuan.edu; raj.rai@sanjuan.edu; Frank Camarda <frank.camarda@sanjuan.edu >; Fhanysha.Gaddis@sanjuan.edu
Subject: Public Comment for 9/22/26 630pm SJUSD Board Meeting- Rio Americano High School Cell Tower Proposal

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You have not previously corresponded with this sender.

Dear Ms. Roux:

Please acknowledge receipt of this email, confirm that it is made part of the SJUSD School Board's 9/22/26 630pm Meeting, and that Board members receive it and have time to review it. I81-1

Thank you so much. :) Lisa Phenix

Public Comment for 9/22/26 SJUSD District Board Meeting

RE: Rio Americano High School Cell Tower Proposal

Dear Superintendent, Ms. Cunningham and SJUSD Board Members:

A focused DEIR as to the proposed Rio Americano High School Stadium expansion came out 9/1/26. The links did not work properly until 9/2/26 or 9/3/26. This DEIR states that a cell tower at Rio Americano High School has been approved. I81-2

District staff advised community members that the proposed cell tower at Rio Americano High School would proceed through CEQA with an intent to exempt the cell tower. District documents showed CEQA paperwork prepared to be submitted regarding the proposed cell tower. Community members relied on District staff representations and paperwork related to the proposed cell tower and have been waiting for the asserted CEQA process. I81-3

Has the cell tower been approved? With respect to the Rio Americano High School Cell Tower proposal, I respectfully request that the District by written response to my email at sillylittlemama@icloud.com , inform me

- about what specific action was taken approving the cell tower,

- the date and decisionmaker,

- what CEQA process, determination, and/or exemption occurred

- whether a notice of exemption was filed,

- whether the Board adopted any Government Code section 53094 resolution. If so, please advise the date, time, board meeting at which this occurred .

I81-3 (Cont.)

Thank you for your careful attention to this matter.

Sincerely, Lisa Phenix, educator and Rio alum parent, and neighbor

Wendy Copeland
Senior Environmental Scientist
Pronouns: she/her
Environment IAP
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Letter I82

From: Construction
To: Rio Americano
Subject: FW: Comments on the Draft Environmental Impact Report (DEIR) — Rio Americano High School Stadium Improvements Project, SCH No. 2026010094
Date: Thursday, October 15, 2026 3:00:43 PM
Attachments: PastedGraphic-1.png
PastedGraphic-2.png
PastedGraphic-3.png
Screenshot 2026-10-15 at 10.01.49 AM.png
PastedGraphic-4.png
image001.png
10 15 26 DEIR Public Comment Letter by Lisa Phenix.docx

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Please included, thank you.

Cassandra Baumgart
Administrative Assistant to
Frank Camarda, Chief Operations Officer
San Juan Unified School District
916-971-5740 | VOIP: 405107

From: sillylittlemama@icloud.com <sillylittlemama@icloud.com>
Sent: Thursday, October 15, 2026 10:05 AM
To: rioEIR@aecom.com; Construction <construction@sanjuan.edu>; Melissa Bassanelli <MBassanelli@sanjuan.edu>; boardmemberers@sanjuan.edu
Subject: [EXTERNAL] Comments on the Draft Environmental Impact Report (DEIR) — Rio Americano High School Stadium Improvements Project, SCH No. 2026010094

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October 15, 2026
Nicholas Arps
Construction and Modernization Facilities Director
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
Nicholas.arps@sanjuan.edu, Suzanne.McFerran@aecom.com, info@sanjuan.edu, mbassanelli@sanjuan.edu, boardmembers@sanjuan.edu, nroux@sanjuan.edu, trent.allen@sanjuan.edu, fhanysha.gaddis@sanjuan.edu, frank.camarda@sanjuan.edu, raj.rai@sanjuan.edu, construction@sanjuan.edu, rioEIR@aecom.com

Please email confirm that this DEIR Public Comment is properly received
RE: Comments on the Draft Environmental Impact Report (DEIR) — Rio Americano High School Stadium Improvements Project, SCH No. 2026010094

Dear Mr. Arps:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Rio Americano High School (Rio) Stadium Improvements Project. To state the location description accurately, the location where the Rio Stadium is proposed is a track field with 288 seats. This is not an improvement. It is replacement of a track field with a proposed high capacity bleachered stadium/public events center with seating for 2575. I82-1

San Juan Unified School District (District) Chief Operations Officer Camarda advised that the District was doing a focused EIR. This project is substantial and will affect Rio's campus, the residentialcommunity, the adjoining sensitive American River Parkway (Parkway), and the federal and state designated Wild and Scenic Lower American River (LAR). I respectfully request a complete evaluation of the project's impacts on Rio, nearby residents, the Parkway, the LAR, wildlife, and the surrounding transportation network. I82-2

This proposed high intensity stadium and public events center would substantially change Rio's campus, the enjoyment of the neighborhood, adjacent Parkway, and LAR. This proposal includes so many substantive changes to the surrounding area; the physical installation of four 80-foot stadium light poles, an almost 10 fold increase in seating capacity, sound and vibration from high bleachers and people on them, the introduction of a modernized public-address system, additional day and nighttime activities, a substantial increase in traffic, lack of accommodations like bathrooms for I82-3

potentially 3000 people, lack of a meaningful evacuation plan improvement. The environmental review must account for the full consequences of operating this facility over time, including the frequency, duration, attendance, and cumulative effects of events, and additional safety concerns. I82-4

The DEIR itself identifies real concerns about Parkway aesthetics, nighttime noise and lighting impacts on wildlife and residents, increased event traffic, and insufficient parking. It concludes that stadium event noise would remain significant and unavoidable after mitigation. These findings warrant a careful examination of the no build alternative, all reasonable feasible alternatives and enforceable measures before the District selects a project. I82-5

A. A Comment on Process as to the DEIR

Request 1. The District had a comment form on its website at the time of the scoping meeting and the public was directed to fill it out. Were the comment forms received and included? If so, where? None of the comment forms appear to be included as public comments received in Appendix A. I respectfully ask that the revised DEIR advise whether anyone filled out the survey comment form, whether Aecom received any of these comment forms, whether Aecom was able to review any of these comment forms, and include their points in the DEIR. If no comment forms were received, please explain their absence. I82-6

Request 2. On 2/4/26 County Parks Director Liz Bellas submitted a direct letter to the District regarding the proposed stadium project. I note that the email is attached in Appendix A, but not the text of the letter. Did Aecom and the District actually receive the letter, review it and include in its process of the DEIR? Why is the actual letter itself not included in the DEIR. I request that a revised DEIR be prepared that includes this letter in a readable fashion so that the public can review it, cite, etc and to confirm it is properly part of the Administrative record. I82-7

Request 3. Very close in time to when the DEIR came out, the District switched the person to send DEIR comments to from Nicholas Arps, with the District, to rioEIR@aecom.com. The notice just changed the email; it did explain that the email address to send comment to had changed. Please explain why this change occurred, whether all known public comments were submitted from the District to Aecom for review, and inclusion in the DEIR, and whether all public comments were listed in the DEIR. If not, please explain why not and require a revised DEIR with all this information. I82-8

Request 4. I note that District has chosen to not include the DEIR appendices as part of its posting to the CEQA clearinghouse. https://files.ceqanet.lci.ca.gov/328270-2/attachment/OKwj9u3t28wc59sPKjV8RBIC8EuuSYGGw7tP6aw6XIS1Ms3Kf7uM87zTaKmlC4VfvyxgVRK4Bu4qnDlx0 Please describe who made this decision, why it was made, what is the legal basis for it, and what is the standard for including Appendices with the DEIR to CEQ Net clearinghouse. I82-9

B Please develop all reasonable stadium alternatives.

The DEIR process is supposed to provide meaningful environmental assessment and review. This includes presenting all reasonable alternatives to the lead agency, the District. Per the District's contract with Aecom, the District hired Aecom to present only two alternatives, no build or build near American River Drive. Please have a revised DEIR include all reasonable alternatives. Continuing to use the Rio gym for student rallies and community building is viable and without cost. Adjusting sport practice schedules to early in the morning and during daytime hours is viable and no cost. Switching to battery operated electric lights for nighttime field activity is viable, lost cost, and would stop the District from polluting its own students, the neighbors and the Parkway. Bussing Rio students to El Camino High for its games is viable, low cost, and reduces air pollution and travel issue raised. A smaller, less intrusive stadium without lights, with a focus on daytime games is viable and less costly. Any of these ideas or a combination of them offer reasonable alternatives. I82-10

-Please revise the DEIR to include all reasonable alternatives and resubmit it for public review.

C. Fully evaluate consistency with the Wild and Scenic Rivers Acts, Urban American River Parkway Preservation Act and the American River Parkway Plan I82-11

The Parkway is not simply an adjacent recreational area. It is a significant natural, scenic, wildlife, and open-space resource connected to the Lower American River. One federal and two state laws specifically protect this area; the Federal Wild and Scenic Rivers Act (FWSRA), the State Wild and Scenic Rivers Act (CWSRA), and the State Urban American River Parkway Preservation Act (UARPPA). Numerous County codes apply to make sure building is done well and with respect to the character of the community and Parkway. I respectfully request that the DEIR meaningfully evaluate this proposed stadium project for consistency with these and all applicable federal and state laws, and county regulations. At present, the DEIR fails to do so. California Public Resources Code § 5842(b) provides that actions of state and local agencies with regard to land-use decisions shall be consistent with the American River Parkway Plan, subject to the provisions of that section. Sections 5841 and 5841.5 provide relevant definitions and legislative findings concerning the Parkway and Lower American River.

The DEIR should include a substantive analysis of consistency with the Parkway Plan, including the policies identified in public comments concerning compatibility of adjoining uses, visual screening, and protection of the Parkway's aesthetic and natural values. In particular, the District should address Parkway Plan Policies 7.19, 7.23, and 7.24, including how the proposed stadium's permanent high-mast lights, event noise, increased activity, and visual presence would be compatible with the Parkway's purpose and character. The DEIR should adjust the proposal accordingly to meet the requirements of the Parkway Plan. Please see attachment #1, 2/4/26 letter from Liz Bellas, Sacramento County Parks Director, sent to the District regarding this proposed stadium. The present proposal and DEIR fail to meaningfully address this need.

The DEIR's conclusion that the elevated levee and existing trees block many views of the stadium from portions of the Parkway is not substantiated, and does not, by itself, resolve these issues. Those of us in who live nearby, can attest that this is not accurate. At a minimum, the DEIR acknowledges that the upper portions of the poles and luminaires may be intermittently visible from the Parkway and the levee-crown access road. The analysis should accurately distinguish among viewpoints and evaluate the actual effects from public locations where the project would be visible and/or audible. The District should explain how the project would comply with applicable Parkway Plan policies, identify any potential inconsistencies, and demonstrate I82-12

why the selected alternative would best protect the Parkway's natural, scenic, and recreational qualities.

I82-12 (Cont)

D. Lighting, glare, and nighttime conditions

I82-13

The project proposes four permanent light standards approximately 80 feet tall and additional pedestrian-path lights. This is a lot more light proposed in this small neighborhood, with homes next to the proposed location, and the Parkway directly behind the proposed stadium.

The DEIR estimates that full illumination could be used for five to eight home football games annually, with reduced illumination for other evening or nighttime events and practices. It also identifies the potential for as many as 40 evening or nighttime events and up to 88 days of practice involving some evening use and illumination. This is a significant increase in nighttime activity.
These estimates need to become clear,and include binding limits on actual operations. The public should not be left to infer future use from preliminary estimates.

I82-14

Although the lighting report models low levels of light at specified property lines and the Parkway edge, modeled footcandle values alone do not fully describe the experience of looking toward high-mast luminaires from nearby homes, the levee, or the Parkway. The DEIR should clearly disclose the assumptions used in the lighting simulations, including which fixtures operate during each type of event, and demonstrate that the final installed system performs as modeled.
For a follow up EIR, I request the following measures:

1. Require a final lighting design to receive the best available darkness approval offered by DarkSky/International Dark-Sky Association before FEIR.
2. Establish enforceable limits on the number of nighttime events, the number of days lights may operate, the hours of operation, and the duration of post-event lighting.
3. Require lights to be turned off promptly after the event and safe egress, with only the minimum lighting necessary for safety retained for a defined, limited period, with automatic shutoff.
4. Prohibit unnecessary lighting during practices and events, require the lowest illumination level adequate for the activity, and require fixtures to be aimed and shielded to minimize spill, glare, and skyglow.
5. Conduct post-installation nighttime testing from representative residential locations, American River Drive, Whitehall Way, the levee-crown access road, and appropriate Parkway viewpoints. If actual conditions exceed the approved limits or create material glare or spill, require corrective action.
6. Preserve existing screening vegetation where feasible, replace any vegetation damaged or removed by the project and add vegetation to screen this area from the Parkway.

A certification of the lighting design should not substitute for verification of actual performance after installation.

E. Noise from crowds, bleachers, the public-address system, and evening activities

I82-15

The DEIR's noise analysis is particularly important because it acknowledges a significant and unavoidable operational noise impact even after mitigation. It explains that crowd noise, bleacher activity, and other event-related sounds cannot be fully controlled and may cause substantial temporary increases over ambient evening conditions.
This conclusion supports the need to examine alternatives that reduce noise exposure at its source, rather than relying solely on operational rules after the stadium has been built. Moreover, as this proposal is a want, not an education need, and is along the highly protected and environmentally sensitive Parkway and LAR, the present proposal along the Parkway fenceline may well be not feasible.

I82-16

I respectfully request a revised DEIR that
-Evaluates noise for high-attendance football games, rivalry and playoff games, graduation ceremonies, band activities, practices, and other foreseeable events.
-Analyze both amplified sound and unamplified crowd noise at the nearest homes and other representative receptors, including homes along Whitehall Way, across American River Drive and residences affected along the river corridor.

I82-17

-Requires installation of a public-address system with directional speakers, controlled dispersion, zone controls, and enforceable volume limiters, with speakers oriented toward the field and seating rather than nearby residences or the Parkway.
-Requires sound checks and measurements at property lines before evening operations begin, followed by monitoring during representative events.
-Establishes clear, enforceable maximum sound levels and require adjustments or additional controls if monitoring shows that the limits are exceeded.
-Requires amplified sound, music, and band activity to cease by a firm evening curfew, with only brief safety or emergency announcements permitted afterward.
-Prohibits unnecessary public-address use and artificial noisemakers at evening events.
-Establishes a documented complaint-response process, including a responsible District contact, timely investigation, event monitoring, and enforceable corrective action for repeated or verified violations.
- removal of sound producing systems if Noise becomes a public nuisance or conflicts with the UARPPA

The District should not treat the fact that stadium events are intermittent as a reason to discount their effects. Evening and nighttime noise can disrupt the use of homes and outdoor spaces even when it does not occur every day. Also, it can harm wildlife. The alternative analysis should compare the degree to which relocation and design changes can reduce these effects and make necessary reductions enforceable.

F. Wildlife, habitat, and the Parkway interface

I82-18

The Parkway and LAR support wildlife and natural habitats. They will likely be affected by light, noise, and increased nighttime activity even when construction and ongoing use stays within school property.

I82-19

The Parkway is closed from dusk to dawn daily. Parkway gates are locked nightly. Rio abuts the Parkway. Next to the location of the proposed stadium, Rio has access to the Parkway that lacks a gate. Increased nighttime events will result in an increase in attendees unlawfully entering the

Parkway at night. The DEIR must address this concern.

I82-19 (Con.)

The DEIR's biological discussion draws on a bat habitat assessment and emergence surveys conducted in July and August 2025. The supporting survey memo identifies potential roost habitat in trees along the Parkway and reports bats foraging above the stadium and adjacent grassland. The absence of observed emergence from the surveyed trees during the survey period does not establish that the surrounding corridor is free of wildlife impacts or that future nighttime operations would have no effect.

I82-20

The DEIR should ensure a thorough biological analysis that includes all species impacted, evaluates both direct and indirect impacts during construction and operation, including effects associated with lighting, noise, disturbance, nesting birds, wildlife movement, and the use of adjacent habitat.

I request that the DEIR:
- Obtain review from a qualified, independent biologist with appropriate experience in the species and habitat of the Parkway and LAR corridor.
- Have this biologist conduct additional seasonal surveys for bats, nesting birds, and other relevant wildlife, including surveys of suitable habitat in the adjacent corridor where access and permissions allow.
- Establish enforceable limits on lighting spill and unnecessary nighttime disturbance, informed by the biological assessment and applicable agency guidance.
- Retain mature trees and screening vegetation along the southern campus boundary wherever feasible and require replacement planting if any are lost. Add substantial amount of native trees and screening vegetation to compensate for the increased presence of activity near the Parkway and LAR corridor.
- Identify appropriate avoidance and monitoring measures for sensitive periods and habitats, rather than relying solely on a one-time preconstruction survey.

I82-21

- Explain how the final project and mitigation measures would protect the Parkway's natural values and comply with applicable Parkway Plan policies
- Establish a documented complaint-response process, to inform District regarding Parkway concerns, including a responsible District contact, timely investigation, monitoring, and enforceable corrective action for harm to the Parkway, and LAR corridor
- The District add a gate at Rio that is locked at dusk to dawn to prevent access from Rio into the Parkway when it is closed.

G. Traffic, parking, and neighborhood access

I82-22

DEIR inadequacies and inconsistencies

Appendix E, the Local Transportation Analysis, identifies serious concerns under high-attendance conditions. For a conservative event, it estimates 3,400 attendees and substantial increases in delay at certain intersections, including American River Drive at Saverien Drive/Project Driveway 2. The analysis reports that the modeled delay at this intersection increases from 9.3 seconds under existing conditions to 147 seconds under existing-plus-project conservative-event conditions.

The same analysis estimates 823 vehicles of peak parking demand for a typical football-game scenario against 672 publicly available on-campus parking spaces, producing a deficit of 151 spaces. For a conservative event, it estimates 1,295 vehicles of parking demand, a deficit of 623 on-campus spaces, and a remaining deficit of 296 spaces even after accounting for the 327 off-site street parking spaces identified in the analysis.

These are not minor uncertainties. They indicate that large events will place substantial pressure on nearby streets and intersections.

Appendix F, the VMT analysis, estimates a net reduction in vehicle trips and vehicle miles traveled compared with holding football games at El Camino High School. However, regional VMT and local congestion are different questions. A reduction in total trip distance does not eliminate the potential for long queues, blocked driveways, parking spillover, or unsafe conditions at the specific streets serving Rio Americano.

The two transportation analyses also use different assumptions regarding the share of attendees who walk, bike, or are already on campus. The DEIR should be revised to reconcile those assumptions and provide a consistent analysis of trip generation, intersection delay, queueing, and parking demand under typical and conservative event conditions.

I82-23

Additional ACOE Traffic Concerns

The Army Corp of Engineers (ACOE) maintains the levee directly behind Rio. ACOE has an upcoming project, very close to Rio to reinforce the river banks of the Lower American River near Rio. (see May 2025 Final American River Common Features, 2016 Flood Risk, Management Project, Sacramento, California, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV, State Clearinghouse # 2005072046 (Report) https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/_ARCF%20Final%20SEIS-SEIR%20Document%2009MAY25.pdf?ver=LG0SUUZjm7tJTWNXyKZiFA%3d%3d

In this ACOE Report link, Page 3-70, Site 4-2 is listed as a staging area that will be used to stockpile supplies needed to implement American River Erosion Contract 3B North. Figure 3.5.2-7, American River Erosion Contract 3B North Site 4-2 Footprint at page 3-34 shows a map of this staging area right past Rio.

This means that ACOE will be driving trucks up and down American River Drive close to and past Rio within the next year or so for the foreseeable future, accessing side streets to drive onto the levee, to reinforce it and areas of the river around Rio. They will be staging equipment near Rio. This is a substantial traffic consideration that the DEIR must factor into its modeling.

I82-24

Upcoming Neighborhood Traffic and Parking Congestion Town Hall Must be Included in FEIR assessment.

Traffic congestion, parking and safety are substantial concerns in our neighborhood. Large numbers of cars drive over the Watt North bridge daily to come to Rio and the surrounding area. Students, parents, staff, neighbors, parkway users drive to
- Rio, 4540 American River Drive, Sacramento, CA
-American River Parkway, (next to Rio)
-Jesuit High School 4660 Fair Oaks Boulevard, Sacramento, CA, (essentially across the street although main entrance is on Fair Oaks Boulevard)
-Del Dayo Elementary School, 1301 McClaren Drive, Carmichael , CA (within ½ a mile of Rio)
-Sheriff's Training Academy, 1000 River Walk Way, Carmichael, CA (within ½ mile of Rio)
-William Pond Park, 5700 Arden Way, Carmichael, CA (less than a mile from Rio)
-Our Lady of the Assumption Catholic School, 5057 Cottage Way, Carmichael, CA (1.3 miles from Rio)

-Ralph Richardson Center, 4848 Cottage Way, Carmichael, CA (1 mile from Rio)
-El Camino Fundamental High School, 4300 El Camino Ave, Sacramento, CA (within 2 miles of Rio)

The Wilhaggin Del Dayo Neighborhood Association has dedicated its annual meeting to this exact problem as its biggest concern. See Attachment #3. The District's Mr. Camarda is one of the many panelists. This is how a community traffic assessment meaningfully begins.

I request the following measures:
- a traffic modeling revision that includes all these locations above as regular daily and weekly incoming area traffic
-Please contact all the panelists listed in Attachment # 3 for their comments and feedback on how to mostly safely add the expected traffic increase at Rio due to the proposed stadium.
- Delay the FEIR until after the above reach out, the neighborhood meeting of 12/9/26 and the results of this town hall flush out how to properly address these traffic concerns in our neighborhood.
-Require a binding traffic and event parking management plan before stadium proposal approval
- Demonstrate how all event parking demands will be accommodated without relying on uncontrolled parking in residential neighborhoods.
- Prohibit event-related parking in designated neighborhood streets where it would block driveways, restrict access, or create safety hazards, and provide adequate enforcement to make restrictions effective.
- Require event staffing and traffic control at key intersections and access points, with a plan for managing queues and protecting pedestrian and bicycle movements.
-Coordinate with Sacramento County, Metro Fire, CHP, Parkway Chief Ranger, ACOE and affected agencies regarding traffic management and any needed intersection improvements.
-Require monitoring of actual traffic, queueing, parking occupancy, and neighborhood spillover during the first 2 full school years of operation of proposed stadium if approved and during anticipated high-attendance events, with mandatory corrective measures if predicted conditions are exceeded.
- Provide clear advance notice of night and large events and a reliable contact for residents to report access or parking problems to in real time with the authority to address this concern

The DEIR should not rely on the possibility of using additional neighborhood street parking as the solution to a documented parking deficit. If adequate parking and safe access cannot be demonstrated for the proposed attendance, the DEIR should require capacity reduction for events and/or restricting the number and size of events.

H. Cumulative impacts and the complete project setting

The DEIR should consider the project in the context of other existing and reasonably foreseeable activities in the area.

CELL TOWER
The DEIR mentions an approved cell tower on Rio. If authorized, this tower will take up space, its generator will make sound, vibration and could it affect wildlife. The DEIR should access where it would be in proximity to the proposed stadium and what precautions would be taken to keep attendees away from it.

OTHER RIO CAMPUS PROPOSALS
The District should also clarify the relationship between this stadium project and any separate campus proposals that could affect the same area. If another project is legally separate, the DEIR should still evaluate it as a reasonably foreseeable project where required for the cumulative analysis. The environmental review should clearly distinguish the stadium project from separate proposals while avoiding the omission of foreseeable combined impacts.

JESUIT
Jesuit High School and stadium is essentially across the street from Rio and has comparable relevant campus projects. The cumulative analysis should address combined effects on nighttime lighting, noise, local traffic and parking, visual character, wildlife, and the Parkway experience.
The analysis should consider circumstances in which events at Rio and Jesuit occur on the same evening. The transportation appendix includes a scenario involving simultaneous events, but the DEIR should clearly explain the results and establish a practical coordination plan to avoid or manage overlapping high-attendance events and their parking demands.

ACOE PROJECT NEARBY
As mentioned above, the ACOE American River Common Features Project, finalized in May 2025, will substantially impact Rio, the community and the Parkway with trucks, traffic, building equipment sound, vibration, etc. A revised DEIR will need to research what ACOE intends to do to specifically analyze and include the impact of traffic, parking, dust, staging, que delays, etc. of multiple ACOE trucks, equipment, and materials in and around Rio.

I. Safety Concerns, including Fire and Flood risk, Require an Updated DEIR Evacuation Plan

Rio backs up to the American River Parkway on an entire side of its 40+ acre parcel. The Park Ranger's office confirms there are approximately 100 fires in the Parkway every year. Metro fire patrolling the levy behind Rio this year had to put out a fire on campus emitting noxious fumes. (see Attachment #4.) A records search of 911 logs show 50 calls from Rio campus since February 2024. The fire department goes to Rio regularly.

Emergency personnel need to be able to easily get in and out of Rio. The parking lot is laid out to funnel a que of students out in limited ways. Adding a stadium with lots of events annually, some including an increase of thousands of persons, will only exacerbate a serious existing problem. This puts students, parents, staff, attendees at personal risk. It increases the District's exposure to liability. Aecom should consult County Parks, the Park Ranger's Office, Metro Fire, and all related safety agencies in the area to prepare an updated comprehensive evacuation plan. A revised DEIR with this plan should be prepared and presented to the public for review.

I82-24 (Cont.)
I82-25
I82-26
I82-27
I82-28
I82-29
I82-30
I82-31

Recent weather reports forecast substantial rain, such that on 9/21/26, California's Governor issued a state of emergency. https://www.gov.ca.gov/2026/09/21/governor-newsom-proclaims-state-of-emergency-to-bolster-statewide-el-nino-preparedness-protect-california/ "The Sacramento Area Flood control Agency identifies Sacramento as the nations' greatest metropolitan flood risk. https://waterresources.saccounty.gov/us/en/stormready/regions-flooding-history.html

I82-32

As stated above, ACOE has the above mentioned project, very close to Rio to reinforce the river banks of the Lower American River behind Rio, to address flooding concerns. The ACOE's almost 400 page supporting document shows how serious this concern is. The DEIR lacks any simulation or modeling to safely get 3000 people out of the proposed stadium in the back corner of Rio if flooding occurs. Aecom should consult all relevant county, state and federal flood agencies to prepare a comprehensive evacuation and safety plan for this proposed project. A revised DEIR with this information should be prepared and presented to the public for review before any proposal is approved.

J. Construction, the levee, and river-corridor protection

I82-33

The project description anticipates construction during summer 2027. The DEIR should provide a clear construction schedule and identify the expected duration of the major activities, including excavation and installation of the high-mast lighting foundations.

I82-34

Given the campus's proximity to the flood-control levee and the American River corridor, a revised DEIR should describe what steps have been taken to coordinate with the appropriate flood-control and other responsible agencies to confirm that the final design, excavation, construction access, staging, and drainage measures will not interfere with levee maintenance, flood-control functions, or other applicable requirements.

I82-35

Construction staging, equipment, material storage, and parking should remain within approved areas on the school property. THE DEIR should have enforceable measure to assure construction does not spill over into the Parkway. The DEIR must also identify dust, noise, lighting, runoff, and spill-prevention controls to protect nearby residents and the river corridor.

The DEIR must establish a documented complaint-response process, to inform District regarding neighbor and Parkway concerns relating to construction, including a responsible District contact, timely investigation, monitoring, and enforceable corrective action.

K. Enforceable mitigation and public accountability

I82-36

The DEIR proposes a number of mitigation measures, but the final environmental document should ensure that measures intended to protect residents and wildlife are specific, measurable, funded, and enforceable. All mitigation measures are listed as permissive, "should". Any FEIR must require "shall" and "must".

The District should identify who is responsible for implementing each measure, when it must be completed, how compliance will be verified, and what corrective action is required if it fails. Where monitoring is necessary, results should be documented and made available to the public.

I82-37

The District should also provide a clear process for residents to report problems during events and obtain a timely response. A mitigation measure that depends on voluntary compliance without a defined monitoring and enforcement mechanism will not provide adequate assurance that impacts will be controlled.

L. Request for a revised analysis and a better project alternative

I82-38

For the reasons above, I request that the District revise or supplement the environmental analysis to address the identified issues and provide a meaningful comparison of feasible alternatives.
At minimum, the District should:

1. Revised the DEIR to include all reasonable alternatives.
2. Refine the alternatives to reduce noise and traffic impacts on the residential neighborhoods, the Parkway and the LAR
3. Evaluate reduced capacity, reduced illumination, limits on permanent lighting, and strictest operating restrictions where these measures could avoid or reduce significant impacts.
4. Complete a robust consistency analysis under the Urban American River Parkway Preservation Act and the American River Parkway Plan.
5. Reconcile the transportation assumptions and demonstrate a feasible parking and traffic-management strategy for both typical and high-attendance events.
6. Establish enforceable measures for lighting, noise, wildlife protection, event scheduling, parking, and public complaints.
7. Explain how cumulative impacts, including simultaneous events at nearby stadiums, would be avoided or reduced.

The purpose of this letter is not to oppose improvements that benefit students. It is to ask that those improvements be planned in a way that meets the students needs in the best way, respects the surrounding community and protects the Parkway and Lower American River, which are important public resources.

The District has an opportunity to demonstrate that it can meet its educational objectives while reducing avoidable impacts on the Parkway and its neighbors. I urge the District to select the feasible alternative that provides the greatest environmental protection, to commit to effective mitigation, and to ensure that the final project reflects those commitments in both its design and operation.
Thank you for considering these comments. Please include this letter in the administrative record and provide a written response to all the substantive issues raised.

Sincerely,
Lisa Phenix, mom of twin Rio alums, rio neighbor and educator
Attachments:

1) 2/4/26 County Parks Director Letter to SJUSD
2) Site Map showing ACOE Staging Area near Rio
3) Wilhaggin Del Dayo Neighborhood Associations Traffic Town Hall Meeting 12/9/26
4) 3/20/26 1123 pm fire at Rio near Levee

Department of Regional Parks
Liz Bellas
Director

County of Sacramento

Office of the County Executive
David Villanueva
County Executive

Community Services
Dave Defanti
Deputy County Executive

February 4, 2026

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

Subject: Notice of Preparation for an Environmental Impact Report and Initial Study for the Rio Americano High School Stadium Improvements

Dear Mr. Arps,

The Sacramento County Department of Regional Parks (Regional Parks) has reviewed the Notice of Preparation (NOP) associated with the proposed stadium improvements at Rio Americano High School (RAHS). This campus is directly adjacent to the American River Parkway (Parkway), which stretches from Nimbus Dam to the Sacramento River confluence and is designated as a Wild and Scenic River under both State (1972) and Federal (1981) law.

Protection of its core values is governed by the American River Parkway Plan (Parkway Plan), adopted under the Urban American River Parkway Preservation Act (California Public Resources Code Section 5840). As the entity primarily responsible for administering the Parkway Plan, Regional Parks reviews projects within and adjacent to the Parkway to ensure consistency with the Plan's policies and goals, including the goals and objectives outlined in the associated Natural Resources Management Plan (2023).

Regional Parks' review is focused on the project's location within the Parkway Corridor (PC) Overlay Zone, which implements Parkway Plan Policy 7.24 regarding the design and location of adjacent development. This policy and the associated overlay zone provide specific standards for height, color, texture, and scale to minimize adverse impacts on the Parkway's aesthetic and natural resources. The key components of the proposed stadium enhancements considered during our consistency review include:

- **Lighting System:** Four permanent 80-foot-tall high-mast light poles at the stadium and six 15-foot-tall pedestrian light poles providing nighttime visibility between the stadium and parking area.
- **Seating and Capacity:** Replacement of existing bleachers to accommodate a total capacity of approximately 2,500 people, representing a significant intensification of use near the Parkway boundary.
- **Facility Upgrades:** Construction of a new press box on the south bleacher section and an upgrade to the stadium's existing PA system.

As currently proposed, the RAHS Stadium Improvements would adversely impact the aesthetic and biological values of the Wild and Scenic Parkway. Specifically, the proposed lighting system and the currently planned cell tower would be highly visible from within the Parkway corridor. The introduction of a powerful new light source, combined with increased noise from expanded stadium capacity, would degrade the Parkway's natural aesthetic.

Furthermore, both light and noise—compounded by the presence of a cell tower—can severely impact wildlife. Artificial light disrupts circadian rhythms, creates navigational confusion for migratory birds, and alters predator-prey dynamics. The addition of a cell tower introduces further hazards, including increased avian collision risks—particularly for birds already disoriented by stadium lighting—and potential electromagnetic interference with animal navigation.

Simultaneously, increased noise contributes to habitat fragmentation and physiological stress while masking vital wildlife vocalizations used for mating, territorial defense, and predator detection. These cumulative impacts are especially critical given the project's location adjacent to the Parkway's narrowest reach, where the wildlife corridor bottlenecks for approximately six miles.

To avoid or significantly reduce these impacts, the Environmental Impact Report (EIR) should evaluate alternatives such as establishing a substantial woodland buffer on the campus boundary and relocating the stadium to the northern portion of the campus adjacent to American River Drive. The State Wild and Scenic designation and the State-adopted Parkway Plan emphasize the regional importance of this river corridor. While the San Juan Unified School District operates as a local educational agency, it remains subject to the State of California's environmental regulations and the mandates of the Wild and Scenic Rivers Act. It is imperative for the health of the Parkway ecosystem that the district ensures full compliance with these laws and planning documents to protect the integrity of the Parkway's protected values.



Liz Bellas,
Director of Regional Parks

Document outline

- Chapter 1. Introduction
  - 1.1 Scope of the Environmental Analysis
  - 1.2 Project Location and Study Area
    - 1.2.1 Project Location
  - 1.3 Background of the American River Common Features Project
  - 1.4 Project Authority
  - 1.5 Project Purpose and Need for Action
  - 1.6 CEQA Project Objectives
  - 1.7 Environmental Regulatory Framework and Authority
    - 1.7.1 National Environmental Policy Act
    - 1.7.2 California Environmental Quality Act
    - 1.7.3 State and



Mark your calendar!

Traffic & parking Town Hall event Dec. 9



WDDNA's annual member meeting in December will have a different format this year. Instead of a speaker, we have scheduled a Town Hall event focusing on neighborhood traffic and parking problems. We strongly urge you to attend.

Neighborhood traffic and parking issues are a major concern for many WDDNA members. They are the most common issues reported to our deputies and the source of frequent emails to WDDNA from members.

Traffic and parking issues are complex and are affected by through traffic from adjacent thoroughfares, drivers going to and from neighborhood schools, road markings and signage, weekend visitors to the parkway, dangerous and illegal actions by some drivers and a growing lack of compliance with speed limits and stop signs.

Because of this complexity, WDDNA will devote this year's December meeting to a Town Hall focused on traffic issues and featuring a panel of local officials whose agencies either impact or deal with traffic in our neighborhood.

Officials who have agreed to take part in the panel include the following:

- Frank Camarda, chief operations officer for San Juan Unified School District, and Mike Jones, director of Safe Schools
- Dr. Michael Wood, principal of Jesuit High School
- CHP Capt. Jami Kenyon and a representative from CHP's local POP unit
- Lu Li, of the Sacramento County Department of Transportation (or his designated representative)
- Vanessa McCarthy-Olmstead, Rich Desmond's chief of staff
- A representative from the Sheriff's Department Parking Enforcement Division
- One of our Sheriff's Department patrol deputies

We will start the meeting by introducing the panel and asking them to briefly speak about their impact on or work to deal with traffic and parking in our neighborhood. Then we will break the meeting discussion up into several specific topics for panel discussion and audience questions and comments.

Full NERIS Report v2.0 PRA

Details Reported by Dispatch

Incident Number: F26053247

Dispatch Timeline

Call Arrival: 03/20/2026 23:23:04
Call Answered: 03/20/2026 23:23:04
Call Created: 03/20/2026 23:23:04
Incident Clear: 03/20/2026 23:52:16
Alarm: 03/20/2026 23:26:19
First Arrival: 03/20/2026 23:33:34
In Service: 03/20/2026 23:52:16

Location as Reported by Dispatch

District:
Zone Number: 240148
City, State, Postal Code: Sacramento,CA95864

Unit Response as Reported by Dispatch

Unit Responses

Dispatch Unit NERIS ID	Dispatch Unit Name	Apparatus ID	Dispatch Unit Dispatch Time	Dispatch Unit Enroute to Scene Time	Dispatch Unit on Scene Time	Dispatch Apparatus or Resource In Service Date Time	Dispatch Unit Incident Clear Time	Dispatch Unit Response Mode
FD06067148S052U000	E110	E110	23:26:19	23:27:29	23:33:34	23:52:16	23:52:16	Emergent
FD06067148S052U002	E510	E510	23:29:30	23:29:30	23:35:28	23:52:11	23:52:11	

Incident Details

Incident Date: 03/20/2026
NERIS Incident ID: FD06067148|F26053247|1774074184
Primary Incident Type: Fire - Outside Fire - Trash / Rubbish Fire (151)
Shift: B
Location Use Type: Education - K - 12 Schools
Incident Action Taken: Suppression - Outside Fire
Suppression - Fire Control Extinguishment
Incident Action Type: Action
Primary Station: 110 (110)
Incident Number: F26053247
Response Mode: Code 3
Incident Location In Use: No

Incident Timeline

Alarm: 03/20/2026 23:26:19
First Unit Arrival : 03/20/2026 23:33:34

Letter I83

From: Patricia Prendergast
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: Rio Americano High School Stadium Project
Date: Sunday, September 27, 2026 8:50:44 PM

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- *Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.* I83-1

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I83-2 I83-3 I83-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I83-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I83-6

I have further outlined my concerns about the project and the DEIR below. I83-7

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I83-8

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I83-9

Incomplete Environmental Baseline and Project Description – I83-10

• The DEIR/FEIR must specify the maximum and accurate operating conditions for

stadium use rather than generalized “typical” operating conditions. I83-10 (Cont.)

• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I83-11 I83-12

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I83-13

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I83-14

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I83-15

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I83-16

Thank you for your consideration,
Patricia Prendergast

Letter I84

From: Judy Press
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Thursday, October 15, 2026 2:07:30 PM

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To whom it may concern,
I am an avid Parkway user I belong to Sac Fit and am on the Parkway weekly. The Parkway is a beautiful, natural asset to our Community, which needs to be protected. Please protect this unique asset for future generations, do not destroy for Parkway users, wildlife, and future generations. I84-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I84-2 I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I84-3 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I84-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I84-5

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I84-6

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I84-7

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.
Incomplete Environmental Baseline and Project Description – I84-8

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I84-9

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008.
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using.

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use.
Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.
Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

I84-9 (Cont.)
I84-10
I84-11
I84-12
I84-13

Thank you for your consideration,

Judy Press

Sent from my iPhone

Letter I85

From: Marybeth Primeau
To: Rio Americano
Cc: mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: Fwd: Comments on DEIR for Rio Americano High School Stadium Improvements Project, State Clearinghouse Number 2026010094, Assessor"s Parcel Number 292-0210-019-0000
Date: Wednesday, October 14, 2026 6:00:58 PM

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Subject: Comments on DEIR for Rio Americano High School Stadium Improvements Project, State Clearinghouse Number 2026010094, Assessor's Parcel Number 292-0210-019-0000

Dear Mr. Arps, Ms. Bassanelli, and Board Members,

Thank you for the opportunity to comment on the draft environmental impact report (DEIR) for Rio Americano Sports and Events Stadium (State Clearinghouse Number 2026010094, Assessor's Parcel Number 292-0210-019-0000). I am a homeowner and tax payer in Sacramento County, in the San Juan Unified School District. I85-1

The DEIR is deficient and incomplete. The areas of deficiency include: I85-2

1. The impact on wildlife of the American River Parkway (hereafter referred to as the "Parkway").
2. The impact on human recreation on the Parkway.
3. The impact on residential neighbors
4. Assessment of alternative options
5. Assessment of cumulative impacts

Impact on wildlife I85-3

The Parkway is a federally and state designated Wild and Scenic River. It provides unique riparian refugia, in the midst of urban and residential development, for numerous animal

and plant species. Commonly seen species include mule deer, river otters, coyotes, wild turkeys, bobcats, bats, egrets, herons, and great horned owls. Also potentially present are several threatened and protected species, including the northwestern pond turtle, Swainson's hawk, white-tailed kite, song sparrow, and valley elderberry longhorn beetle.

I85-3 (Cont.)

Throughout the DEIR, impacts of the stadium on wildlife living on the Parkway is ignored. Impacts are not considered significant because "no sensitive habitats are located on or within 100 feet of the project site." While this may be legally acceptable, it is not biologically sound. A large, noisy, bright stadium and events center on the edge of the Parkway will definitely have deleterious effects on the wildlife that live there.

Impacts inadequately addressed include light, noise, and potential for unruly behavior on the Parkway.

I85-4

The DEIR uses as existing baseline conditions the high-intensity, portable, diesel-powered lights that have been use only recently. The baseline should be set at the conditions before these portable lights were utilized.

I85-5

The Joint IDA_IES designates the area of the Parkway south of the Rio Americano High School to be Lighting Zone LZ-0, which means the Parkway should have very low ambient light. While the DEIR proposes a DarkSky-oriented design, there is no guarantee that the installed lighting will meet the modeling standards. Bats are nocturnal feeders, and their foraging may be disrupted by the presence of stadium lights in their feeding area. This can also result in a loss of roosting areas. The DEIR admits that this is a "potentially significant impact," but offers no mitigation plan.

I85-6

Noise will also have a negative impact on wildlife. The stadium is projected to have noise levels up to 93 dBA. Noise can profoundly affect the reproduction of birds, and will alter the behavior of most of the animals along the Parkway. The DEIR acknowledges that "anthropogenic noise can result in potential impacts to wildlife's survival and fitness." But without providing any supporting evidence, the DEIR concludes that the "impact would be considered less than significant." This concern cannot be simply ignored and must be addressed in the EIR.

I85-7

The DEIR further downplays the risk of the stadium project to wildlife in the Parkway, with the caveat that "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." This ignores the cumulative impacts of levee reconstruction and other ongoing development, and is counter to the designation to protect the Parkway.

I85-8

Impact on human recreation on the Parkway

I85-9

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).

Throughout the DEIR, it is stated the stadium is visually blocked from the Jedediah Smith Memorial Bike Trail by the levee. This is not true! From the bike trail, you can see most of the goalpost uprights and half of the scoreboard.. .

I85-9 (Cont.)

The goalposts are 25-30 feet tall. The scoreboard is about 29 feet tall. The proposed press box would be 30 feet tall, and the railing on the roof would be at 34 feet elevation. The home bleachers would be 26 feet tall, and the light poles 80 feet tall. Current stadium structures taller than 20 feet are readily visible from the bike trail. The bleachers and press box would be clearly visible from the bike trail, and unequivocally would visually impact the Parkway. This is inconsistent with the County Zoning Code. Additionally, 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). This stadium proposal is counter to that ruling.

I85-10

Placing the stadium directly adjacent the Parkway increases the possibility of unruly behavior and litter on the Parkway, particularly at night. The DEIR includes no mention of a plan for security to prevent unauthorized trespassing on the Parkway during evening events. A clearly defined security plan must be included.

I85-11

Impact on residential neighbors

The DEIR describes noise measurements taken at El Camino High School during a Rio Americano High School football game. Noise levels were measured as high as 93 dBA, similar to a motorcycle at 25 feet (Temple U, Dept Civil Engineering; Federal Interagency Committee on Noise). The DEIR allows for noise levels of 70 dBA at residential property lines. However, Sacramento County policy mandates night time noise standards of a median of 50 dB and a maximum of 70 dB. The policy NO-15 further mandates "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." The DEIR describes site design efforts with the PA system, bleacher and ramp noise control "where feasible," restrictions on noisemakers, and limitations on amplified music and band activity after 10 pm. The bleacher and ramp noise control features must be defined in the EIR. No mitigation measures for crowd noise and band noise (before 10 pm) are offered. As noise policy thresholds will be exceeded routinely, and setbacks are not feasible, the EIR must include a plan must to add sound barriers.

I85-12

Noise from parking is considered "insignificant." This conclusion is made without evidence. The noise from the parking lot must be evaluated and included in the EIR.

I85-13

There is inadequate parking on the campus to accommodate the volume of cars for evening

I85-14

football games. The DEIR estimates that up to 620 cars would be parked on neighborhood residential streets. This could result in parking violations such as obstructed driveways and parking near corners that limit visibility. The DEIR describes no mechanism for parking enforcement; this must be included. I85-14 (Cont.)

This uncontrolled parking, with a single designated crosswalk in the vicinity of the high school, also raises concern for pedestrian safety. A plan to address pedestrian safety must be included. I85-15

A left-turn queue of 1055 feet (0.2 mile) is predicted at the intersection of Saverien Drive with Fair Oaks Boulevard. This, along with the potential of illegal parking blocking driveways, without enforcement, raises serious concerns regarding emergency access. An emergency access plan must be included. I85-16

No plan is offered to manage any of the above concerns, other than a proposal to discuss with Jesuit High School the use of the Jesuit High School parking lots as overflow sites. A proposal to discuss is inadequate. A clearly defined overflow parking management system must be defined and documented, including the mechanism to compel drivers to use the alternative parking lots rather than residential streets. However, if simultaneous events occur at both high schools, such an overflow parking system becomes untenable. This must clearly be addressed, with a well-defined plan to avoid concurrent events at both high schools. I85-17

A clearly defined traffic management plan must also be included. This includes directing cars to the appropriate parking areas and managing traffic congestion to allow for emergency access and egress. I85-18

The DEIR states "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." Documentation as to how this would be accomplished must be provided. I85-19

Assessment of alternative options

The DEIR provides only a cursory assessment of the alternatives of continuing to use the stadium at El Camino High School, or using the Hughes or Hornet stadiums. I85-20

Any of these would avoid all of the negative impacts to the wildlife of the Parkway, to the recreation on the Parkway, and to the quality of life and safety of the residential neighbors of Rio Americano High School. These alternatives would also free up $10 million of District funds to use to address the greater than $40 million backlog of deferred maintenance at Rio Americano High School. Addressing this maintenance would enhance the safety and well-being of the students, and avoid the escalating costs of further deferral.

The DEIR also posits that vehicle miles traveled would be lower for events at Rio Americano High School than at El Camino High School, without providing any data to support this claim. The vast majority of students are driven daily to Rio Americano High School; to make I85-21

the above claim, the EIR must provide data on where students live relative to the two high schools. I85-21 (Cont.)

Assessment of cumulative impacts

The cumulative impacts of large capacity sports and events centers at two high schools (Jesuit and Rio Americano) less than a mile apart is not addressed. The impact of current events at both schools, particularly on traffic, parking, and emergency access is not addressed; a thorough assessment and management plan must be included in the EIR. I85-22

In fact, on pages 7-12 to 7-13, the DEIR states that if there were high-capacity events at both high schools, the congestion at Saverien Drive and Fair Oaks Blvd. would be alleviated by development of a use agreement for off-site parking at Jesuit High School. This clearly makes no sense. The EIR must describe a management plan to address traffic, parking, and emergency vehicle access in the event of concurrent events at both high schools. I85-23

The lower American River is a federal and state protected Wild and Scenic River. This is an irreplaceable asset. Once it is harmed, there is no going back. I85-24

This unique waterway in an urban and suburban area offers recreation that I enjoy daily, and is a jewel of the Sacramento region. Harm it, and our entire region is harmed.

Rio Americano High School has the opportunity to use this natural asset to enhance the education of its students. It can play evening football elsewhere, and all other sports in the current facilities, but no other high school has the opportunity to educate its students in a protected riparian habitat.

Rio Americano High School is the wrong location for a high-intensity stadium. The best option is to continue to use an alternative stadium for night-time football games. I85-25

If the district is to proceed, an Environmental Impact Report must be provided that includes enforceable measures to avoid or substantially mitigate the impacts of night-time lighting, noise, traffic, parking, security, and safety. Calling these impacts “less than significant,” or addressing them by stating a plan will be developed in the future is inadequate and unacceptable. I85-26

Sincerely,

Marybeth Primeau

1081 Harrington Way

Carmichael , CA 95608

440-476–4873

Letter I86

From: Cathryn Rakich
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: Public Comments Opposing Rio Stadium Project
Date: Sunday, October 4, 2026 6:27:25 PM

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Below are our public comments on the Rio Americano High School Stadium Project. Please add to the official record. I86-1

To whom it may concern:

We oppose the stadium-improvement project at Rio Americano High School, which is situated between populated neighborhoods and the state-protected American River Parkway. I86-2

The project will substantially increase noise pollution, light pollution, traffic and safety issues in our neighborhood. I86-3

Because of its proximity to the American River Parkway, Rio Americano High School is not suitable for a high-intensity sports and events stadium. The impact on wildlife along the wild and scenic parkway from the increased light and noise will be devastating. I86-4

High-intensity traffic and parking during sporting and other events will pose numerous safety issues, as well as disruptive noise to our quiet neighborhood. I86-5

Rio students can continue to enjoy high-volume sports and other activities at El Camino High School's stadium, which is located in a much more suitable location. I86-6

Thank you for your consideration.

Thank you,
Mark & Cathryn Rakich
4030 Greywell Way
Sacramento CA 95864

Letter I87

From: Francesca Reitano
To: Rio Americano
Cc: mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu

Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Thursday, October 15, 2026 1:08:10 AM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I87-1 I87-2 I87-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I87-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I87-5

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short: I87-6

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I87-7
Incomplete Environmental Baseline and Project Description – I87-8

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I87-9
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I87-10

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I87-11

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I87-12

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I87-13

The Parkway is a jewel that belongs to all residents of the Sacramento Valley. All impacts to the Parkway - it's wildlife, wildlife habitat and recreational use must be considered. I87-14

Thank you for your consideration,

Francesca Reitano
Elmhurst, Sacramento

Letter I88

From:	ALAN RHODES
To:	Rio Americano
Subject:	Comments on Rio Americano HS Stadium Improvements Draft EIR (SCH No. 2026010094) – Noise Impacts on the American River Parkway
Date:	Friday, October 16, 2026 1:55:43 PM
Attachments:	Rhodes_Rio_Americano_DEIR_Noise_Comments-4.pdf
Importance:	High

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Report Suspicious

Dear AECOM and San Juan Unified School District,

Please find attached my comments on the Draft Environmental Impact Report for the Rio Americano High School Stadium Improvements Project (SCH No. 2026010094). My comments address noise impacts, particularly on the American River Parkway. The full text is also included below in case the attachment does not open. I88-1

These comments are intended to complement those submitted by Dr. Andrea Willey of the Waterbird Habitat Project, which document wildlife observations at mile 11 of the Parkway.

Thank you for the opportunity to comment. Please include these comments and your responses in the Final EIR and the administrative record.

Sincerely,
Alan Rhodes
8579 Emperor Drive
Fair Oaks, CA 95628

Alan Rhodes
8579 Emperor Drive
Fair Oaks, CA 95628

October 16, 2026

Via email: RioEIRcomments@aecom.com

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

Re: Comments on the Rio Americano High School Stadium Improvements Project Draft EIR (SCH No. 2026010094) – Noise Impacts on the American River Parkway

Dear Mr. Arps:

These comments address one topic: the noise impacts of the proposed project, particularly on the American River Parkway immediately south of Raider Stadium. They concern Section 4.3 (Noise and Vibration), Appendix D (Noise Data), and the related conclusions in Section 4.2 (Biological Resources).

1. The Parkway beside the stadium is quiet today, and the EIR never measured it at night.

The only Parkway measurement (ST-03, near the American River Trail, 3:13 p.m.) shows a background of about 42–43 dBA (L50/L90), the level of a quiet residential area. No nighttime measurement was taken anywhere in the Parkway, even though the project's principal change is new evening events. Applying the EIR's own method (65–78 dBA Leq at 50 feet from the nearest seating, −6 dB per doubling of distance), game-time levels would reach about 59–72 dBA at 100 feet and 53–66 dBA at 200 feet from the bleachers. That is 10 to 29 dB above today's background. By the EIR's own rule that +10 dB is perceived as a doubling of loudness, this is roughly two to seven times as loud, for hours at a time, on up to 13 new evenings per year. The EIR should measure nighttime ambient noise in the Parkway, state the distance from the home bleachers to the levee and trail, and model Parkway receptors.

I88-2

2. The noisemaker ban leaves the dominant source untouched.

Mitigation Measure 4.3-1b prohibits air horns, cowbells, and similar devices. But at a game of 1,500–3,400 spectators, the crowd itself is the dominant source, because crowd noise grows with the number of people (10·log N; Hayne, Rumble & Mee, *New Zealand Acoustics*, 2007). The EIR concedes this: after all mitigation, impacts remain significant and unavoidable because crowd noise and bleacher activity cannot be fully controlled. The noisemaker ban and PA controls cannot offset the main effect on the Parkway.

I88-3

3. Generator noise in the baseline understates the increase.

The soccer readings in Table 4.3-2 taken after the diesel light towers would have been running (ST-04 to ST-06) show a steady noise floor of 58–63 dBA L90, 15–20 dB above earlier readings at the same locations, peaking near 50 Hz. That is engine noise, which the project eliminates. Pre-generator readings (52.7–58.5 dBA Leq) better represent current crowd noise. Against the football reference (65–78 dBA Leq), the increase in crowd noise is roughly 10–20 dB. For context, the EIR itself states that a 3 dB increase is just detectable, 5 dB is distinctly noticeable, and 10 dB is perceived as twice as loud. A 10–20 dB increase is therefore roughly two to four times as loud as today's events.

I88-4

4. Inconsistent distance reference points understate predicted levels.

The El Camino reference levels were measured 50 feet from the *nearest* seating, but the Rio projection measures 350 feet to the *center* of the bleachers. Mixing reference points, and treating a crowd spread along the bleachers as a single point source, understates exposure. The EIR's own setting section notes that extended sources attenuate about 3 dB per doubling of distance, not 6. At that rate, predicted levels at the eastern residences rise from 48–61 dBA to roughly 56–69 dBA.

I88-5

5. Night conditions and open water carry stadium noise farther than the EIR assumes.

I88-6

As shown in Figure 1, the American River and its adjacent ponds lie only about 0.07 to 0.1 mile (roughly 370 to 530 feet) south of the stadium. The EIR's distance calculation assumes simple spreading in a neutral atmosphere. It does not account for three well-documented conditions that help sound travel farther at night over this terrain:

- **Temperature inversions.** On calm, clear evenings, air near the ground and water cools faster than the air above it. Because sound travels faster in warmer air, sound that would normally escape upward is bent back down toward the ground, so distant listeners hear more of it (Embleton 1996). The same bending carries sound over the top of a barrier and down into the area behind it, so the levee shields the Parkway less on the nights events occur than in a neutral atmosphere. The home bleachers, rising about 21.5 feet, and the PA speakers place the noise sources near or above the levee crest. The ponds nearest the stadium are still, sheltered water lying below the surrounding ground, where cool air settles on calm evenings, the condition that produces inversions.
- **Hard, reflective water.** Water is acoustically hard: it reflects sound rather than absorbing it, unlike vegetated ground. The UK Institute of Acoustics notes that standard models have under-predicted noise across water because of this reflection combined with downward refraction (IOA 2014; Hubbard & Shepherd 1991).
- **Humid air.** Moist air absorbs less sound energy at mid and high frequencies than dry air at typical evening temperatures (ISO 9613-1; Harris 1967). The river corridor is typically more humid at night. Over these distances the effect is smaller than the first two, but it works in the same direction and favors the higher-pitched sounds most noticeable to listeners: shouts, whistles, cheers, and amplified voice.

Even under the EIR's own assumptions (65–78 dBA Leq at 50 feet, −6 dB per doubling of distance), crowd noise at the river's edge would be about 45–60 dBA, above the measured Parkway background of 42–43 dBA. Night conditions would push these levels higher and carry them farther. A review of 242 studies found that wildlife responses to noise begin at about 40 dBA (Shannon et al. 2016). For birds, the documented effects include altered song (45–73 dBA), increased stress (48–66 dBA),

declines in abundance (45–55 dBA), and reduced breeding success (43–68 dBA). Territorial birds rely on song to defend territories and attract mates, so noise that masks song affects them directly. Stadium events would occur from August through June, including spring months when riparian birds are nesting. The trees between the levee and the water are a narrow band, largely deciduous and bare from late fall through early spring, and provide limited attenuation. I88-6 (Cont.) I88-7

6. The significance conclusions contradict each other, and a fair analysis is required. I88-8

The EIR finds event noise significant and unavoidable for residents about 350 feet away. Yet it finds noise effects on wildlife less than significant in a quieter Parkway that is as close or closer, without any nighttime Parkway measurement and without considering the nighttime conditions described above. To reach a supportable conclusion, the EIR should:

- Measure nighttime ambient noise in the Parkway, including at the ponds and river.
- State the distance from the proposed home bleachers and PA system to the levee, the Jedediah Smith Memorial Trail, the ponds, and the river.
- Model propagation to those receptors under nighttime conditions, including a downward-refraction (inversion) case, with the water treated as a reflective surface.
- Determine the levee's actual shielding by measurement rather than assuming it: place a calibrated loudspeaker at bleacher and PA height, measure simultaneously on the stadium side of the levee and in the Parkway beyond it, and do so on calm, clear evenings with temperature and wind recorded to document inversion conditions.
- Model the crowd as a distributed source, using consistent distance reference points, and a baseline free of generator noise.
- Evaluate wildlife effects against documented thresholds (Shannon et al. 2016).
- Reconcile its significance conclusions for residents and wildlife, and evaluate Alternative 2, which moves the stadium about 875 feet from the Parkway, as mitigation for wildlife noise impacts.

Thank you for considering these comments. Please include them, and your written responses, in the Final EIR and the administrative record.

Sincerely,

Alan Rhodes
8579 Emperor Drive
Fair Oaks, CA 95628

Figure 1. Distance from Raider Stadium to the American River



Measured using Google Earth. The river and adjacent ponds lie about 0.07 to 0.1 mile (370–530 feet) south of the stadium.

References

Embleton, T.F.W. (1996). Tutorial on sound propagation outdoors. *Journal of the Acoustical Society of America*, 100(1), 31–48.

Harris, C.M. (1967). *Absorption of Sound in Air versus Humidity and Temperature*. NASA CR-647.

Hayne, M.J., Rumble, R.H., & Mee, D.J. (2007). Prediction of crowd noise. *New Zealand Acoustics*, 20(1), 13–20.

Hubbard, H.H., & Shepherd, K.P. (1991). Aeroacoustics of large wind turbines. *Journal of the Acoustical Society of America*, 89(6), 2495–2508. (Cited in IOA 2014 for water as an acoustically hard surface.)

Institute of Acoustics (2014). *Supplementary Guidance Note 6: Noise Propagation over Water for On-Shore Wind Turbines*. Milton Keynes, UK.

International Organization for Standardization (1993). *ISO 9613-1: Acoustics – Attenuation of sound during propagation outdoors – Part 1: Calculation of the absorption of sound by the atmosphere*.

San Juan Unified School District (2026). *Rio Americano High School Stadium Improvements Project Draft EIR*, Section 4.3 and Appendix D (Noise Data). SCH No. 2026010094.

Shannon, G., et al. (2016). A synthesis of two decades of research documenting the effects of noise on wildlife. *Biological Reviews*, 91(4), 982–1005. doi:10.1111/brv.12207

Letter I89

From:	Barbara Selewicz
To:	Rio Americano; nicholas.arps@sanjuan.edu; mbassanelli@sanjuan.edu
Cc:	Barbara Selewicz
Subject:	Comments from SJUSD board meeting on June 23, 2027
Date:	Saturday, September 26, 2026 11:15:46 PM

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You have not previously corresponded with this sender.

Report Suspicious

Hello,

My name is Barbara Selewicz and I attended the meeting on June 23, 2027. I spoke during the public comments section voicing the following concerns for the new stadium plans at Rio Americano High School. I89-1

As a close neighbor to Rio Americano High School, I have many concerns regarding the plans to build an event and sports stadium. My number one concern is the potential for San Juan to rent the facility out to groups other than Rio or outside the district altogether. This means that events could possibly take place daily or nightly. I89-2

This proposed stadium would increase the seating capacity from 288 to 2500 people. I believe this would greatly impact the neighborhood as well as the American River Parkway in ways such as heavy traffic, extremely loud noise, bright lights and security issues. I89-3

Therefore, I am against proceeding with the plans for this stadium, when there is a perfectly good stadium just 3 miles away at ElCamino High School. I89-4

Thank you,

Barbara Selewicz

Sent from my iPad

Letter I90

From:	Barbara Selewicz
To:	nicholas.arps@sanjuan.edu; frank.camarda@sanjuan.edu; mbassanelli@sanjuan.edu; boardmembers@sanjuan.edu; Rio Americano
Cc:	barjsel@icloud.com
Subject:	Rio American Stadium Project DEIR Comments
Date:	Thursday, October 15, 2026 11:58:23 PM
Attachments:	Rio DEIR Comments - Barbara Selewicz.docx

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Report Suspicious

My attached comments about the Rio Americano Stadium DEIR are attached. Please confirm that you have received these comments and were able to open the file. I90-1

Thank you,

Barbara Selewicz

Nicholas Arps, Director of Facilities Construction & Modernization,
Frank Camarda, Chief Operations Officer,
Melissa Bassanelli, Superintendent of Schools,
School Board Members,
Aecom Rio EIR Comment Recipient

October 15, 2026

Following are my comments regarding the Rio Americano Stadium Project and DEIR.

As a close neighbor to Rio Americano High School and a frequent user of the American River Parkway, I would like to express my concerns regarding the plans for building a new stadium on the Rio Americano campus. This school is in very close proximity to neighboring homes on three sides and a wild and scenic parkway on the fourth side. Because of this location, this project will have negative impacts not only on the surrounding neighborhoods, but also on vast number of community members who use the Parkway for relaxation, enjoyment of nature and wildlife, swimming, rafting, hiking, walking, birding, cycling, picnicking, etc. The peace and quiet that this Parkway provides for both the wildlife as well as community members would be greatly affected by the addition of lights and added noise from the increase in events and increased capacity for many of these events and games. I90-2

Building a stadium in the middle of a neighborhood and next to a wild and scenic parkway is unnecessary as there is a perfectly good stadium 3 miles away that Rio has used in the past for football games which are some of the largest events the new Rio stadium is being built to accommodate. Is this really worth $8 million which could be spent on the billions of dollars of repairs need throughout the district? Please consider continuing to use El Camino High school rather than building a new stadium so close to El Camino. As stated in the DEIR, attendance for football games in the past ranges from 1,100 to 3,400 spectators so clearly it is not a hardship for students and parents to attend the games a few miles down the road. I90-3

I strongly request the SJUSD board reallocate the $8 million of funds budgeted for the Rio stadium to fix the known issues with plumbing, electrical, roof leaks, campus safety and classroom cleanliness in the district. I90-4

In response to the DEIR, the mitigations are inadequate and specific information is lacking.

The DEIR attempts to minimize the impact of event noise from cheering, stomping, band music, and public address system noise. It lists ideas for reducing noise but there is no commitment to keep noise below certain levels. Where will speakers be placed to aim sound away from neighbors and Parkway? I90-5

Prior to DEIR, we saw capacity continually shown as 2,575. Now we see events of up to 3,500 people. What is the true capacity? What is fire marshall approved capacity for events? At what point will Rio consider an event sold out or at capacity and turn people away? I90-6

Nowhere in the DEIR does it state an exact number of events that will use lights or time restrictions for using lights. The DEIR includes some estimates but those don't appear to be commitments. It should include specific time limitations for use of lights, especially during weekends. I90-7

The DEIR makes no mention of rentals or uses by organizations or teams not affiliated with Rio Americano High School. Currently other organizations rent the field, especially on weekends. Will Rio or the district commit to no rentals or use by other organizations, especially using lights? I90-8

Because Rio is so close to the Parkway, there is a zoning height limitation of 30 feet for any structures. Please describe how Rio is attempting to claim exemption from that limit. I90-9

The DEIR discusses parking and traffic and uses Jesuit as alternate parking but neighborhoods will be much more attractive since they are closer to Rio. For traffic, will there be a traffic management plan to avoid the chaotic messes that exist when school lets out every day? I90-10

What responsibility will Rio take for dealing with neighborhood parking issues, trash, vandalism and other potential problems? Will there be a Rio contact if any of these potential problems occur or will we be told to call 911? I90-11

In closing, I encourage you to leave the parkway as it is for the large communities of residents and wildlife to enjoy without intrusion of excess noise and lighting. You, as leaders of a school district could use this valuable asset in your science programs to teach the students about the importance of preserving the 40+ fish species, hundreds of plant varieties and over 220 mammals and bird species. I90-12

Thank you for your consideration. I look forward to a direct response to the questions included in this letter and please confirm receipt of these comments.

Regards,

Barbara Selewicz
barjsel@gmail.com

Letter I91

From:	Joe Selewicz
To:	nicholas.arps@sanjuan.edu; frank.camarda@sanjuan.edu; mbassanelli@sanjuan.edu; boardmembers@sanjuan.edu; Rio Americano
Subject:	Rio Americano High School Stadium Improvement Project DEIR Comments
Date:	Thursday, October 15, 2026 10:22:49 PM

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TO THE ATTENTION OF:
Nicholas Arps, Director of Facilities Construction & Modernization (nicholas.arps@sanjuan.edu),
Frank Camarda, Chief Operations Officer (frank.camarda@sanjuan.edu),
Melissa Bassanelli, Superintendent (mbassanelli@sanjuan.edu),
San Juan School District School Board (boardmembers@sanjuan.edu),
Aecom Rio EIR Comments (RioEIRcomments@aecom.com),

October 15, 2026

Hello,

I submit the following public comments pertaining to the Rio Americano High School Stadium Improvement Project DEIR (SCH Number: 2026010094). Please confirm receipt of these comments and provide responses, in writing, to questions and requests included in the comments, below. I've also attached an identical version of these comments. I91-1

Before I get to my comments, I urge the Board to consider the cost vs. benefit of this proposed project. You are being asked to support and approve spending $8 million (per SJUSD document) to eliminate a 3 mile commute to El Camino High School for 6 or 7 football games each season. I91-2

At the same time, and I quote from the FAQ's section of the Measure P page of your SJUSD website, there are numerous, more prudent uses of these funds.

> *QUESTION: What repairs and upgrades are included in Measure P? ANSWER: Many local schools are more than 70 years old and in need of significant repairs. A recent report showed that we have as much as **$3.5 billion** (emphasis mine) in need. Measure P could provide funding to: keep classrooms safe and clean, fix deteriorating classrooms and leaky roofs, fix water pipes, plumbing, bathrooms, and electrical wiring, provide safe drinking water, and replace outdated security and fire safety systems.*

Nowhere on the Measure P web page is there any mention of athletic facilities. With this level of necessary repairs, spending $8 million on a stadium just to be able to play football games 3 miles closer to home and perhaps host a graduation at the school is fiscally irresponsible.

Curiously, the SJUSD Citizen's Bond Oversight Committee bylaws state meetings will be held quarterly. The last was held on February 19, 2026 and subsequent meetings scheduled for May 21 and June 11 were cancelled. Should you not be considering their guidance when making project approval and spending decisions? Have they provided a recommendation for this project? If so, what was that recommendation? Please provide an answer to that question. I91-3

This DEIR fails to provide adequate detail in numerous sections and fails to answer many questions I asked in my previous NOP comment letter. I've sent a separate comment letter addressing those I91-4

omissions, but I request the following items be described, in detail, in the final EIR. I91-4 (Cont.)

STADIUM USAGE:

It is shocking that Table 3-1 doesn't differentiate between events with and without use of lights as the increase in night events is one of the key concerns of community members and American Parkway advocates. How many of these "Field Use Activities" are expected to utilize lights? Under what circumstances will partial brightness be utilized? Are there any limitations placed on number of days or hours when lights can be utilized? For this to be a comprehensive EIR, please add columns specifying how many of these "uses" will utilize lights. THIS IS NOT A TRIVIAL POINT. I91-5

Furthermore, some of the "existing conditions number of days activity occurs on site" on Table 3-1 seem grossly understated. For example, football season lasts 10 weeks not including practice in advance of the season. Assuming 3 days per practice per week (which is likely less than what actually occurs) and 2 full weeks of practice prior to the season, that equates to approximately 40 days. The table shows 20-24. Since this table forms the basis for comparing proposed to existing use, please update to include accurate existing usage. I91-6

Table 3-1 references "School Sanctioned Community Events". Please provide examples of such events? Who will decide whether such events will be approved? I91-7

Table 3-1 includes events with up to 3,000 and 3,500 attendees. How does that equate to the 2,575 bleacher seats available and the parking estimates included in the DEIR? Where will attendees in excess of 2,575 be seated? I91-8

Table 3-1 states there have been "Up to 4 Field Days" currently occurring and proposed with attendance of 1,500-3,000. Please provide descriptions and quantities of those days in the past that are being used as reference for the current state. I91-9

Table 3-1 makes no mention of Jr. Raider football or the adult soccer teams that have been utilizing the field on Saturday mornings (apparently without authorization). Please ensure EIR provides a full list of all expected use as Table 3-1 appears to include only usage by Rio Americano High School. This is relevant for both daytime and evening activities. I91-10

Sections 3.4 and 6.2.2 state that a project objective is to "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". Table 3-1 shows an increase of 10-13 events. In the EIR, it is critical that you quantify how many events previously occurring in daylight will now be rescheduled to evening with lights. I91-11

Neighbors and other interested parties have repeatedly asked for information about non-Rio Americano use of the field. WILL FIELD RENTALS OR OTHER USAGE BY NON-RIO AMERICANO TEAMS AND ORGANIZATIONS BE ALLOWED DURING DAYLIGHT DURING THE EVENING? This should be a simple "yes or no" answer. Your continued failure to answer this question in writing or reference in the DEIR leads me to believe there could be significant use of the field by non-Rio Americano teams and organizations. I91-12

The DEIR also fall short in addressing many impacts to the neighboring communities and the American River Parkway. I91-13

PARKING:

Mitigation measure 4.4-3a suggests Jesuit is a viable option of additional parking if required. What happens when there are concurrent games at Rio and Jesuit? Is this a realistic option as there is only a small lot on American River drive and their primary parking lot is not likely to be an attractive option due to its distance from Rio. The DEIR fails to state the number of available parking spaces at I91-14

Jesuit if that campus is utilized. Please include that number in the EIR. The DEIR states a Memorandum of Understanding with Jesuit High School for Shared Parking Agreement will be coordinated with Jesuit. Have there been discussions with Jesuit where they have at least agreed to this in principle? I91-14 (Cont.)

Parking section states that there are 327 available parking spaces in streets near Rio Americano on sections of American River Drive and Saverien Drive. Those are relatively short segments of those streets so it is likely that parking will spill into other nearby residential streets. Please include the list of streets that would likely be impacted for a sellout football game or an event with 3,000 to 3,500 attendees. I91-15

SECURITY FOR AMERICAN RIVER PARKWAY AND NEARBY NEIGHBORHOODS: I91-16

Section 5.1.2 Public Services states there will be no impact to police protection as games are merely being moved from El Camino High's stadium.. However, El Camino isn't located near the American River Parkway Levee. What are plans for levee security as it is closed to public after dusk yet easily accessible from neighboring streets? How wills Rio / SJUSD ensure spectators who wish to avoid buying a ticket or wish to drink or party cannot congregate on the levee? What are plans for monitoring or securing the walkway on east side of Rio property between the field and the Whitehall Way homes during football games or other large events?

The DEIR doesn't appear to describe a process to address issues "real time" as they arise. On a couple of occasions when the Rio Americano portable lights were left on well after the designated end time, we reached out to Rio principal and were advised to "call the authorities" if it happened again. Going forward, this type of generic response will be unacceptable. The DEIR is silent about this but the EIR should include specifics regarding a real time issue resolution process where we can quickly access a real person if necessary to address safety matters, parking issues, trash in neighborhoods or intrusions on private property or the levees specifically due to Rio events.

NOISE: I91-17

Noise is obviously a concern of both community members and American River Parkway advocates. While it's obvious that increases in noise level will increase from spectator cheering and amplified sound from public address system, there is a significant potential impact of foot stomping on metal bleachers. The DEIR states, "*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.*" Based on this description, it is unclear to me whether there will sound dampening of the seats and "floors" in front of the seats as that is where stomping and banging will likely occur and will be much louder than merely walking up and down stairs. Please provide a description of how you are going to minimize the sound carry from stomping and banging on seats and foot space in front of the seats.

LIGHTS: I91-18

The DEIR states, "Evening events shall be scheduled to conclude by no later than 10:00 p.m" but it does not differentiate between football games and other events. It states practices will "generally" end by 8:00 but that doesn't appear to be an enforceable commitment. In EIR, please include details, by event type, of limitations on light usage, including use of dimmed lights and define which of these are enforceable commitments.

The DEIR mentions a free standing scoreboard, but provides no details describing the scoreboard. Will the existing scoreboard be used or will it be replaced? If it is to be replaced, where will it be I91-19

located? Will it include a video screen that will add to the light that could intrude onto the parkway and onto neighboring property? Please address this in the EIR. I91-19 (Cont.)

The DEIR makes numerous references to the diesel lights used today and the "localized engine noise" they generate during use and that the permanent lights will not generate noise. While that is true, the current noise can still be eliminated from temporary lights by utilizing lights that are battery powered. Permanent lights are not the only method of mitigating the diesel noise and odor and that should be noted in the DEIR. I91-20

EIR REQUESTS AND FINAL THOUGHTS: I91-21

Many estimates are included in the DEIR but there is no mention of enforceable limits, requirements, etc. If Rio and SJUSD truly want to work with the community, they will create an enforceable upgrade to Table 3-1 that adds information about use of lights and public address systems and quantifies the related noise, light, and crowd impact to the community and parkway. The enforceable limits should include frequency of events utilizing lights with cutoff times for lights, frequency of events utilizing amplified sound including cutoff times for use of sound, and a commitment that the field will NOT be rented to non-Rio organizations. I91-22

This DEIR downplays the impact to neighbors and the wild and scenic American River Parkway. Yet, the increased seating capacity, the lights that will be available for use during the entire year, the new public address system and the confirmed increase in events will have a significant effect not only on the lives and property values of neighbors, but to the parkway and the many community members who enjoy it's many amenities and the creatures that make the parkway their habitat. This is borne out by the large number of community organizations and parkway advocacy groups that will be voicing their opposition to the project. I91-23

Finally, Rio Americano High School resides in a county area zoned as RD-4 (PC) – Low Density Single Family Residential (Parkway Corridor). I understand SJUSD is claiming this project is exempt from the 30 foot height limitation of any structure (including light poles) that is applicable to their zoning designation. While I can't speak to the future, it's logical to assume this could be challenged in the courts. Is that a risk the SJUSD wants to take? I91-24

As a Sacramento County Taxpayer, a frequent parkway user and a property owner in the community, I strongly urge you to focus on potential improvements and projects that add value to Rio Americano High School and the San Juan Unified School District without the damaging impact to the community and the American River Parkway. I91-25

Thank you,

Joe Selewicz
joejsel@gmail.com

TO THE ATTENTION OF:
Nicholas Arps, Director of Facilities Construction & Modernization (nicholas.arps@sanjuan.edu),
Frank Camarda, Chief Operations Officer (frank.camarda@sanjuan.edu),
Melissa Bassanelli, Superintendent (mbassanelli@sanjuan.edu),
San Juan School District School Board (boardmembers@sanjuan.edu),
Aecom Rio EIR Comments (RioEIRcomments@aecom.com),

October 15, 2026

Hello,

I submit the following public comments pertaining to the Rio Americano High School Stadium Improvement Project DEIR (SCH Number: 2026010094). Please confirm receipt of these comments and provide responses, in writing, to questions and requests included in the comments, below. I91-26

Before I get to my comments, I urge the Board to consider the cost vs. benefit of this proposed project. You are being asked to support and approve spending $8 million (per SJUSD document) to eliminate a 3 mile commute to El Camino High School for 6 or 7 football games each season.

At the same time, and I quote from the FAQ's section of the Measure P page of your SJUSD website, there are numerous, more prudent uses of these funds.

> *QUESTION: What repairs and upgrades are included in Measure P? ANSWER: Many local schools are more than 70 years old and in need of significant repairs. A recent report showed that we have as much as **$3.5 billion** (emphasis mine) in need. Measure P could provide funding to: keep classrooms safe and clean, fix deteriorating classrooms and leaky roofs, fix water pipes, plumbing, bathrooms, and electrical wiring, provide safe drinking water, and replace outdated security and fire safety systems.*

Nowhere on the Measure P web page is there any mention of athletic facilities. With this level of necessary repairs, spending $8 million on a stadium just to be able to play football games 3 miles closer to home and perhaps host a graduation at the school is fiscally irresponsible.

Curiously, the SJUSD Citizen's Bond Oversight Committee bylaws state meetings will be held quarterly. The last was held on February 19, 2026 and subsequent meetings scheduled for May 21 and June 11 were cancelled. Should you not be considering their guidance when making project approval and spending decisions? Have they provided a recommendation for this project? If so, what was that recommendation? Please provide an answer to that question.

This DEIR fails to provide adequate detail in numerous sections and fails to answer many questions I asked in my previous NOP comment letter. I've sent a separate comment letter addressing those omissions, but I request the following items be described, in detail, in the final EIR.

STADIUM USAGE:

I91-26
(Cont.)

It is shocking that Table 3-1 doesn't differentiate between events with and without use of lights as the increase in night events is one of the key concerns of community members and American River Parkway advocates. How many of these "Field Use Activities" are expected to utilize lights? Under what circumstances will partial brightness be utilized? Are there any limitations placed on number of days or hours when lights can be utilized? For this to be a comprehensive EIR, please add columns specifying how many of these "uses" will utilize lights. THIS IS NOT A TRIVIAL POINT.

Furthermore, some of the "existing conditions number of days activity occurs on site" on Table 3-1 seem grossly understated. For example, football season lasts 10 weeks not including practice in advance of the season. Assuming 3 days per practice per week (which is likely less than what actually occurs) and 2 full weeks of practice prior to the season, that equates to approximately 40 days. The table shows 20-24. Since this table forms the basis for comparing proposed to existing use, please update to include accurate existing usage.

Table 3-1 references "School Sanctioned Community Events". Please provide examples of such events? Who will decide whether such events will be approved?

Table 3-1 includes events with up to 3,000 and 3,500 attendees. How does that equate to the 2,575 bleacher seats available and the parking estimates included in the DEIR? Where will attendees in excess of 2,575 be seated?

Table 3-1 states there have been "Up to 4 Field Days" currently occurring and proposed with attendance of 1,500-3,000. Please provide descriptions and quantities of those days in the past that are being used as reference for the current state.

Table 3-1 makes no mention of Jr. Raider football or the adult soccer teams that have been utilizing the field on Saturday mornings (apparently without authorization). Please ensure EIR provides a full list of all expected use as Table 3-1 appears to include only usage by Rio Americano High School. This is relevant for both daytime and evening activities.

Sections 3.4 and 6.2.2 state that a project objective is to "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". Table 3-1 shows an increase of 10-13 events. In the EIR, it is critical that you quantify how many events previously occurring in daylight will now be rescheduled to evening with lights.

Neighbors and other interested parties have repeatedly asked for information about non-Rio Americano use of the field. WILL FIELD RENTALS OR OTHER USAGE BY NON-RIO AMERICANO TEAMS AND ORGANIZATIONS BE ALLOWED DURING DAYLIGHT OR DURING THE EVENING? This should be a simple "yes or no" answer. Your continued failure to answer this question in writing or reference in the DEIR leads me to believe there could be significant use of the field by non-Rio Americano teams and organizations.

The DEIR also falls short in addressing many impacts to the neighboring communities and the American River Parkway.

PARKING:

Mitigation measure 4.4-3a suggests Jesuit is a viable option of additional parking if required. What happens when there are concurrent games at Rio and Jesuit? Is this a realistic option as there is only a small lot on American River drive and their primary parking lot is not likely to be an attractive option due to its distance from Rio. The DEIR fails to state the number of available parking spaces at Jesuit if that campus is utilized. Please include that number in the EIR. The DEIR states a Memorandum of Understanding with Jesuit High School for Shared Parking Agreement will be coordinated with Jesuit. Have there been discussions with Jesuit where they have at least agreed to this in principle?

I91-26 (Cont.)

Parking section states that there are 327 available parking spaces in streets near Rio Americano on sections of American River Drive and Saverien Drive. Those are relatively short segments of those streets so it is likely that parking will spill into other nearby residential streets. Please include the list of streets that would likely be impacted for a sellout football game or an event with 3,000 to 3,500 attendees.

SECURITY FOR AMERICAN RIVER PARKWAY AND NEARBY NEIGHBORHOODS:

Section 5.1.2 Public Services states there will be no impact to police protection as games are merely being moved from El Camino High's stadium.. However, El Camino isn't located near the American River Parkway Levee. What are plans for levee security as it is closed to public after dusk yet easily accessible from neighboring streets? How wills Rio / SJUSD ensure spectators who wish to avoid buying a ticket or wish to drink or party cannot congregate on the levee? What are plans for monitoring or securing the walkway on east side of Rio property between the field and the Whitehall Way homes during football games or other large events?

The DEIR doesn't appear to describe a process to address issues "real time" as they arise. On a couple of occasions when the Rio Americano portable lights were left on well after the designated end time, we reached out to Rio principal and were advised to "call the authorities" if it happened again. Going forward, this type of generic response will be unacceptable. The DEIR is silent about this but the EIR should include specifics regarding a real time issue resolution process where we can quickly access a real person if necessary to address safety matters, parking issues, trash in neighborhoods or intrusions on private property or the levees specifically due to Rio events.

NOISE:

Noise is obviously a concern of both community members and American River Parkway advocates. While it's obvious that increases in noise level will increase from spectator cheering and amplified sound from public address system, there is a significant potential impact of foot stomping on metal bleachers. The DEIR states, "*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*." Based on this description, it is unclear to me whether there will sound dampening of the seats and "floors" in front of the seats as that is where stomping and banging will likely occur and will be much louder than merely walking up and down stairs. Please provide a description of how you are going to minimize the sound carry from stomping and banging on seats and foot space in front of the seats.

I91-26
(Cont.)

LIGHTS:

The DEIR states, “Evening events shall be scheduled to conclude by no later than 10:00 p.m” but it does not differentiate between football games and other events. It states practices will “generally” end by 8:00 but that doesn’t appear to be an enforceable commitment. In EIR, please include details, by event type, of limitations on light usage, including use of dimmed lights and define which of these are enforceable commitments.

The DEIR mentions a free standing scoreboard, but provides no details describing the scoreboard. Will the existing scoreboard be used or will it be replaced? If it is to be replaced, where will it be located? Will it include a video screen that will add to the light that could intrude onto the parkway and onto neighboring property? Please address this in the EIR.

The DEIR makes numerous references to the diesel lights used today and the “localized engine noise” they generate during use and that the permanent lights will not generate noise. While that is true, the current noise can still be eliminated from temporary lights by utilizing lights that are battery powered. Permanent lights are not the only method of mitigating the diesel noise and odor and that should be noted in the DEIR.

EIR REQUESTS AND FINAL THOUGHTS:

Many estimates are included in the DEIR but there is no mention of enforceable limits, requirements, etc. If Rio and SJUSD truly want to work with the community, they will create an enforceable upgrade to Table 3-1 that adds information about use of lights and public address systems and quantifies the related noise, light, and crowd impact to the community and parkway. The enforceable limits should include frequency of events utilizing lights with cutoff times for lights, frequency of events utilizing amplified sound including cutoff times for use of sound, and a commitment that the field will NOT be rented to non-Rio organizations.

This DEIR downplays the impact to neighbors and the wild and scenic American River Parkway. Yet, the increased seating capacity, the lights that will be available for use during the entire year, the new public address system and the confirmed increase in events will have a significant effect not only on the lives and property values of neighbors, but to the parkway and the many community members who enjoy it’s many amenities and the creatures that make the parkway their habitat. This is borne out by the large number of community organizations and parkway advocacy groups that will be voicing their opposition to the project.

Finally, Rio Americano High School resides in a county area zoned as RD-4 (PC) – Low Density Single Family Residential (Parkway Corridor). I understand SJUSD is claiming this project is exempt from the 30 foot height limitation of any structure (including light poles) that is applicable to their zoning designation. While I can’t speak to the future, it’s logical to assume this could be challenged in the courts. Is that a risk the SJUSD wants to take?

As a Sacramento County Taxpayer, a frequent parkway user and a property owner in the community, I strongly urge you to focus on potential improvements and projects that add value to Rio Americano High School and the San Juan Unified School District without the damaging impact to the community and the American River Parkway.

Thank you,

Joe Selewicz
joejsel@gmail.com

Letter I92

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

February 3, 2026 **(UPDATED OCTOBER 15, 2026)**
PLEASE INCLUDE THIS IN DEIR PUBLIC COMMENTS

I92-1

I AM ADDING UPDATES TO MY FEBRUARY 3, 2026 NOP SUBMITTAL TO HIGHTLIGHT MY MANY QUESTIONS AND COMMENTS THAT HAVE NOT BEEN ADDRESSED IN DEIR OR ANY OTHER PUBLIC COMMUNICATION. I'VE HIGHLIGHTED ADDED COMMENTS IN "BOLD CAPS" TYPE.

Mr. Arps,

We live on the street immediately east of the current football field and are concerned about the potential impact of the stadium improvements on our neighborhood and the American River Parkway. We realize plans and details are still being developed and we assume we will better understand the impact once we receive an updated project description within the completed EIR.

In the meantime, we would like to provide feedback based on documents that are currently available. Here are comments, requests and questions related to the Notice of ***Preparation (NOP) of an Environmental Impact Report (EIR) and Initial Study for the Rio Americano High School Stadium Improvements*** and the ***Rio Americano High School Stadium Improvements Initial Study***.

I92-2

The NOP states you intend to prepare a focused EIR. Given the nature and magnitude of this project, a full comprehensive EIR is the proper document. A focused EIR is meant to evaluate unanalyzed or new impacts of a project that is consistent with a previously analyzed EIR or master plan. A comprehensive EIR analyzes all potential environmental impacts of a new project including cumulative impacts and alternatives. I don't believe any previous EIR or plan addresses the scope and breadth of environmental issues and potential alternatives arising from this stadium plan so a focused EIR is not appropriate for this project. We also urge you to consider all environmental impacts not only to the Rio American Americano campus footprint, but to the entire impacted area surrounding that footprint, specifically the American River Parkway and the neighborhoods on both sides of the American River.

I92-3

In your project description and in other forums you continually reference a proposal to "improve the existing Raider Stadium . . . " This is misleading as it's a stretch to consider the existing facility to be a stadium. It is a field with a small number of bleachers and no permanent lighting. You are not improving a stadium. You are converting an existing non obtrusive field to a stadium.

The Project Objectives in the NOP include expansion of Rio Americano to host athletic and non-athletic events. The EIR must include a detailed description and quantification of expected use by Rio Americano and non Rio Americano organizations specifically - - I92-4

- Usage for Rio Americano events
    - How many events and what type of events would involve use of lights with spectators and PA. How many would be Friday – Sunday evenings? **10/15 UPDATE: NOT ADDRESSED IN DEIR. TABLE 3-1 DOES NOT INCLUDE QUANTIFICATION OF EVENING EVENTS UTILIZING LIGHTS**
    - How many and what type of events would involve spectators and PA usage during daylight hours? What usage is expected to occur Friday – Sunday? **10/15 UPDATE: DEIR IS SILENT REGARDING WEEKEND USAGE.**
- Usage for non Rio organizations and groups **10/15 UPDATE: DEIR STATES NIGHTIME FIELD USE FOR GAMES AND PRACTICES WILL BE LIMITED TO SCHOOL-SANCTIONED TEAMS. THIS IS VAGUE AND DOES NOT EXPLICITLY STATE USAGE WILL BE LIMITED TO RIO AMERICANO TEAMS. IT ALSO REFERS TO UP TO 4 SCHOOL SANCTIONED COMMUNITY EVENTS. AGAIN, THAT IS VAGUE AND DOES NOT EXPLICITLY STATE USAGE WILL BE LIMITED TO RIO AMERICANO**
    - What criteria will exist to determine what non-Rio organizations, groups or teams are allowed to use the field during daylight or evening hours?
    - How many events and what type of events would involve use of lights with spectators and usage and on what evenings would field be rented?
    - How many and what type of events would involve spectators and PA usage during daylight hours by day of the week?
    - For usage by non Rio organizations and teams, describe the types of groups and organizations using the field and any limitations on frequency of usage by non Rio organizations or teams
    - For non Rio usage, what will be requirements for usage including security, insurance and post event cleanup?
    - For non Rio usage, how much will users be charged for usage and who will receive that revenue, ie – Rio, SJUSD or other?
- For all field usage, what limitations will exist for events using lights, PA and allowing spectators in terms of hours of the day, days of the week and overall frequency? **10/15 UPDATE: TABLE 3-1 IN DEIR IS NOT SPECIFIC TO WHICH EVENTS WOULD BE IN EVENING USING LIGHTS.** I92-5
- When will lights be required to be turned off?
- Proposals mention "use of other community events". What events are anticipated and will these be limited to Rio related events? **10/15 UPDATE: SEE ABOVE. THERE IS NO EXPLICITY WORDING LIMITING EVENTS TO RIO AMERICANO SCHOOL EVENTS** I92-6

Within the Environmental Review in the NOP, you indicate the EIR will include analysis of various topic areas. Within these areas, I expect EIR detail as follows - - I92-7

- For Aesthetics, Light and Glare
    - Describe steps to ensure there is no direct light shining into yards and homes along streets neighboring Rio High School.
    - Describe how you will ensure there is minimal light bleed onto the American River parkway.
    - Describe hours of allowed light usage and limitations on usage during weeknights and weekends (defined as Friday – Sunday?
    - Describe limits on frequency of overall usage of lights, i.e. allowable usage in a given week, month, year, etc. **10/15 UPDATE; DEIR DOES NOT ADDRESS THIS**

I92-7 (Cont.)

- Noise and Vibration **10/15 UPDATE: DEIR STATES BLEACHERS WILL BE METAL WHILE DEIR REFERENCES SOUND DAMPENING FEATURES ON RAMPS, PLATFORMS AND OTHER WALKING SURFACES, IT MAKES NO MENTION OF THE ACTUAL SEATING AREA WHERE FOOT STOMPING CAN GENERATE SIGNIFICANT NOISE AND VIBRATION.**
    - Describe construction and material of bleachers and steps taken to minimize noise from stomping or banging.
    - Describe maximum decibel level of PA system
    - Describe how PA system will be targeted to minimize sound bleed to neighborhood homes and the American River parkway.
    - Provide specifics of when PA system use will be allowed and whether use will be limited to spoken voice. If PA system is to be used for music or other non-voice use, provide specifics.

I92-8

- Transportation
    - Plans indicate bleacher capacity of 2,500 spectators. Currently, there are fewer than 500 parking spaces on the Rio campus. EIR must include a detailed parking plan including steps to avoid adverse impacts to nearby neighborhoods **10/15 UPDATE: DEIR DESCRIBES 327 ESTIMATED STREET PARKING SPACES BUT DOES NOT DETAIL WHETHER THAT REFERS TO SPACES AVAILABLE FOR RIO EVENTS OR IS TOTAL INCLUDING NORMAL NEIGHBORHOOD EVENING USAGE. IT ALSO DOES NOT DETAIL WHICH STREETS ARE INCLUDED IN THAT COUNT AND THEIR DISTANCE FROM RIO CAMPUS. DEIR MAKES REFERENCE TO OVERFLOW PARKING AT JESUIT BUT DOES NOT INDICATE WHETHER JESUIT HAS AGREED TO A SHARED USE PARKING AGREEMENT.**
    - Describe plan to ensure smooth postgame traffic flow off campus including any plans to hire resources to direct traffic.

I92-9

Following are comments, questions and requests related to the Initial Study

I92-10

SECTION 2 PROJECT CHARACTERISTICS

- Page 2-4, Section 2.1.1 – Report indicates lights will "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).". In EIR, please indicate the what uses of field will utilize full lighting levels and what uses will utilize various lower levels of lighting. What

process and rules will be in place to determine levels of lighting used? **10/15 COMMENT: IN MANY PLACES, DEIR STATES REDUCED LIGHTING "COULD" BE USED FOR CERTAIN EVENTS, PRACTICES, ETC. HOWVER, IT DOESN'T STATE THE REDUCED LIGHTING WOULD BE REQUIRED.** I92-10 (Cont.)

- Page 2-6, Section 2.4. Report states a project objective of "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". EIR should define the "other special and regular events" that are being considered and provide frequency of these events. What is expected frequency of school assemblies? I92-11

SECTION 3 ENVIRONMENTAL CHECKLIST I92-12

- Page 3-1.1 Section 3.1.1a, c – The "scenic vista" is on the south side of stadium. Planned press box is on same side of stadium. Clearly describe the maximum height of the press box and include the farthest distance from which the press box can be seen from the American River Parkway or levee. Explain why press box (which is assumed to be higher than bleacher level) is being located on south rather than north side where it would be less intrusive to the parkway.
- Page 3.4.10, Lighting – report includes the phrase, ". In summary, the proposed stadium lights would not substantially increase lighting in the surrounding area from baseline conditions." This is not true. Baseline during daylight savings time months is zero stadium lighting. Temporary lighting has only existed since 2023 and represents an artificial baseline that did not exist prior to that. Baseline should include only current permanent lighting **10/15 COMMENT: THIS COMMENTS STAND AS DEIR DOES NOT LIMIT FUTURE LIGHTS USAGE TO NON-DAYLIGHT SAVINGS TIME MONTHS, ONLY** I92-13
- Page 3.4.11, Noise – report states, "The stadium's current diesel-powered light towers and PA system already generate noise during daytime and some evening activities." Current use / level of PA system seem minimal currently. EIR should state maximum decibel level of current system and compare to level of proposed system. **10/15 COMMENT: REDUCED NOISE FROM DIESEL LIGHTING CANNOT BE USED AS JUSTIFICATION FOR NEW PERMANENT LIGHTS AS TEMPORARY LIGHT NOISE COULD BE REDUCED BY USING BATTERY POWERED ELECTRIC LED RATHER THAN DIESEL POWER.** I92-14
- Page 3.6.1,2 – Report states, "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." Describe incentives or other plans to incentivize biking and walking rather than driving. **10/15 COMMENT: DEIR IS SILENT REGARDING NON AUTOMOBILE TRANSPORTATION INCENTIVES.** I92-15
- Page 3.15-2, Police Protection – Report states "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." This may not be true depending upon usage of the facility. If Rio or rental events shift from afternoon to evening or if attendance increases due to increased bleacher capacity from 288 to 2,500, additional I92-16

security or traffic management will be necessary. EIR should include an evaluation by Sacramento County Sheriff's Dept. based on detailed expected usage levels.

I92-16 (Cont.)

Here are some additional comments and requested EIR inclusions that weren't noted in the NOP or Initial Study but should be addressed in the EIR or in some other document.

I92-17

- Security: EIR should include a detailed security plan for evening events and daytime events with significant attendance. This should include security for nearby neighborhoods, the levee during night games and for the pathway on the east side of field bordering backyards on Whitehall Way. **10/15 COMMENT: DEIR ADDRESS SECURITY ONLY IN THE CONTEXT OF LIGHTING. THERE IS NO MENTION OF MEASURES THAT WILL BE TAKEN TO PROTECT PARKWAY, LEVEE, OR NEIGHBORHOODS**
- Real time point of contact: Provide a point of contact nearby residents or event attendees can contact for issues arising from field events. This could include lights being left on later than allowed, unauthorized field usage, vandalism of private property, etc. **10/14 COMMENT: DEIR DESCRIBES A DAYTIME PHONE NUMBER FOR CONSTRUCTION ISSUES BUT NONE FOR EVENT OR EVENT AFTERMATH ISSUES.**

I92-18

- Concurrent football games at Jesuit High School: Detail steps that will be taken with Jesuit (or the governing body that creates their schedule) to eliminate or minimize concurrent football games at both stadiums Postgame traffic management: For games with significant attendance, describe steps that will be taken to ensure parking lot can be emptied quickly and efficiently without causing significant traffic backup on American River Drive and Saverien Drive? **10/15 COMMENT: DEIR DOES NOT ADDRESS STEPS TO AVOID CONCURRENT GAMES.**

I92-19

- Restrooms: Provide detail of how many existing restrooms will be accessible to event attendees and how many will be added to accommodate larger expected crowds. **10/15 COMMENT: DEIR STATES PROJECT DOES NOT INCLUDE NEW, PERMANENT RESTROOMS AND MENTIONS PORTABLE RESTROOMS ONLY FOR CONSTRUCTION WORKERS. WILL ADDITIONAL RESTROOMS BE AVAILABLE FOR HIGH CAPACITY EVENTS?**

I92-20

- Changes to other facilities: The Rio campus vision plan dated June 2024 indicates the tennis courts and swimming pool will be relocated. There is no mention of these changes in the NOP or initial study. Please describe in detail the timing of the relocation and plans for lights, bleachers or PA systems for the pool and tennis courts. Additionally, describe any current or future plan to add lights to the baseball field or the mixed use field on the northeast corner of the campus

I92-21

- Scoreboard: Please state whether there are any plans to enlarge or replace the existing football scoreboard or to move the scoreboard away from its current location on the west end of the football field. If a new scoreboard is to include a video screen, will Rio or the SJUSD allow advertising on the screen? **10/15 COMMENT: DEIR MENTIONS SCOREBOARD BUT DOES NOT ADDRESS THESE QUESTIONS.**

I92-22

Finally, in your NOP, you request alternatives. We and most other neighbors and users of the American River Parkway would prefer the alternative of no lights, PA system or expanded bleachers. The status quo seems to have worked just fine for the past 28 years that we have lived here. I92-23

I look forward to reviewing the final EIR and encourage you to reach out to us directly if you would like to discuss these comments or have any questions about them.

Regards,

Joe and Barbara Selewicz
610 Whitehall Way
Sacramento, CA 95864
joejsel@gmail.com

Letter I93

From: SABA
To: Rio Americano
Subject: Stadium Objection
Date: Sunday, September 27, 2026 7:13:42 PM

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Report Suspicious

I’m writing to express my displeasure with the current Rio Americano stadium proposal. I think we need a balance between change and natural worlds, and I see no remedy for bright lights and stadium noise adjacent to the dark nights of the parkway. We as a culture need to say “enough” to destruction of our natural world and the parkway should be inviolate. The parkway is but a small corner we hold for preservation and SJUSD should abide by its intent. Rio Americo High school’s location should be treasured and used to its best potential property. I93-1

I simply know of no way this proposal cannot permanently change the parkway. I93-2

I wish SJUSD could show leadership and devise a solution that permits the community and the natural world to coexist. For example, albeit more expensive, perhaps a major tear down and site redesign that lessens the foot print of the high school through multiple stories and brings the stadium to the road? I’m sure other better ideas are available instead of this “Wrong on the river.”Our child grew up in the area, graduated IB at Mira Loma and we still love the area. I93-3 I93-4

Sent from the all new AOL app for iOS

Letter I94

From: Frank Severson
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject: Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.
Date: Friday, October 2, 2026 10:30:37 AM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I94-1 I94-2 I94-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I94-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. **The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.** I94-5

I have further outlined my concerns about the project and the DEIR below. I94-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I94-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I94-8

Incomplete Environmental Baseline and Project Description – I94-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, I94-10

facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I94-10 Cont'd I94-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I94-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I94-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I94-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I94-15

Thank you for your consideration,

Frank Severson

Letter I95

From: Cheryl Slama
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Saturday, October 3, 2026 4:08:51 PM

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Report Suspicious

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record. I95-1

To whom it may concern,

A high intensity sports/events stadium does NOT belong next to a Wild and Scenic River. PLEASE rethink this for the wildlife's sake and also all the people who cherish the parkway. I95-2

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I95-3 I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I95-4 This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I95-5

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I95-6

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I95-7

I have further outlined my concerns about the project and the DEIR below. I95-8

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I95-9
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I95-10
Incomplete Environmental Baseline and Project Description – I95-11

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations I95-12

consistent with residential use, and the Parkway Plan. I95-13

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I95-14

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I95-15

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I95-16

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I95-17

Thank you for your consideration,

Cheryl Slama

Letter I96

From:	Pete Spaulding
To:	nicholas.arps@sanjuan.edu; Rio Americano
Cc:	pcosta@sanjuan.edu; zima.creason@sanjuan.edu; nick.bloise@sanjuan.edu; tanya.kravchuk@sanjuan.edu; ben.avey@sanjuan.edu; manuel.perez@sanjuan.edu
Subject:	Re: Comments on the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report
Date:	Friday, October 16, 2026 2:54:17 PM
Attachments:	PSRioAmericanoCommentsigned.pdf

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This message came from outside your organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Report Suspicious

Mr. Arps and Board members:
My email sent at 10:34 am this morning included the wrong attachment.
Please disregard that email and use this email and attachment.
I am sorry for my mistake and any inconvenience it caused

I96-1

Pete Spaulding
www.AmericanRiverTrees.org
“Flood Protection without Devastation"
916.947.8018

On Oct 16, 2026, at 10:34 AM, Pete Spaulding <petenyvtca@comcast.net> wrote:

October 16, 2026

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

Via email to:
RioEIRComments@aecom.com
nicholas.arps@sanjuan.edu

Dear Mr. Arps:

I would like to offer the following comments on the Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report, DEIR.

While I do not live in the San Juan School District, I live almost directly across the American River from Rio Americano High School, about ½ mile as a crow flies, and I am a frequent user of the American River and the American River Parkway.

I96-2

The American River Parkway is managed by Sacramento County Regional Parks through the 2008 American River Parkway Plan and the 2023 Natural Resources Management Plan. The Parkway Plan is the policy document for the American River Parkway and the management plan for the federal and State Wild and Scenic Rivers Acts. The locally approved Parkway Plan has been adopted by the State Legislature as the Urban American River Parkway Preservation Act, California Public Resources Code Section 5840 et seq.

The project violates goals and objectives of both these plans, and thereby violates state law. Examples are described below and reference attached pages 173 and 174 from the 2008 American River Parkway Plan.

American River Parkway Plan Policy 1.2 Recreation

The Parkway shall be oriented to passive, unstructured water-enhanced recreation activities which are appropriate in a natural environment, and which are not normally provided by other County recreational facilities. To this end, development in the Parkway shall be minimal, and facilities which are primarily visitor attractions should be placed in less sensitive areas within the County Park system. Insofar as possible, development shall not occur in areas where natural ecosystems are still relatively undisturbed.

This project is adjacent to the American River, a federal and state designated wild and scenic river. This section of the Parkway is designated for Limited Recreation and as a Protected Area. The extraordinary increased capacity of the stadium, and much more frequent use for sporting and non-sporting events, so close to a Protected Area of the Parkway, is a violation of this Policy.

I96-2 (Cont.)

On page 5.13-33, the Draft Environmental Impact Report states: “Therefore, the proposed project would have no impact on recreationists within the Parkway.” Then goes right back to discussing project construction impacts and concludes “therefore, the impact would be less than significant.”

I96-3

Parkway users will be significantly impacted. Parkway users will experience noise, loss of value or their recreation experience. Stadium planned operations has foreseeable and significant impacts that will occur during the day and night. High school band rehearsals typically produce sound levels ranging from 90 to 115 decibels, with some instruments reaching up to 130 decibels during performances. While varsity football games start about 7 PM, junior varsity football games start as early as 5 pm. And football is just one of many sports and events for which the stadium will be used. Other games and events can occur at any time.

I96-4

The DEIR tries to reinforce that impacts are evening only. However, significant impacts from events will occur in day and night hours. The District is planning to use the stadium for both school and non-school events. There are no restrictions on the type of events that will be conducted. Anything from concerts to sporting events, music festivals, rallies, fairs, both school and non-school related, will be allowed. There are no restrictions on the use of amplified sound, the duration, nor limits on the amplification levels or maximum decibels/DBAs. There are no limits on the frequency of events, no maximum number of days per week, events per month or year, no maximum number of hours per day.

The DEIR does state, on page 4.3-18 “no uses of stadium are proposed before sunrise”. However, this is not a commitment or condition of use. There is no event management plan.

I96-4 (Cont.)

American River Parkway Plan Terrestrial Resource 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 (VELB) 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.

I96-5

While this project does not compromise the integrity of flood control facilities, it does threaten the habitat connectivity and wildlife travel corridors by the noise and vibration that will be generated during use, especially during evening and nighttime use, and violates Policy 3.3.

American River Parkway Plan Land Use Policy 7.12
Activities and facilities in the Parkway which attract large numbers of users are to be directed to the less sensitive areas such as Limited Recreation and Developed Recreation areas so that the areas which are more environmentally sensitive can be protected.

I96-6

This section of the Parkway is designated for Limited Recreation and as a Protected Area. The extraordinary increased capacity of the stadium, and much more frequent use for sporting and non-sporting events, so close to a Protected Area of the Parkway, is a violation of this Policy.

American River Parkway Plan Land Use Policy 7.19

I96-7

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.

Since this project is adjacent to the Parkway, the dramatic increase in annual events and the projected attendance at those events, will cause damage to the wildlife through increased noise and vibration. Noise does not stop at the Project boundary. I live on the south side of the American River, about ½ mile from the school, and I hear noise from band practices, swim events and stadium events now.

I96-7
(Cont.)

American River Parkway Plan SARA Park Policy
10.28 The Rio Americano wetland/lagoon area should remain undeveloped and protected.

This section of the Parkway is designated for Limited Recreation and as a Protected Area. The extraordinary increased capacity of the stadium, and much more frequent use for sporting and non-sporting events, so close to a Protected Area of the Parkway, is a violation of this Policy.

I96-8

American River Parkway Natural Resources Management Plan
Goal 4.5 Reduce the amount of ambient light impacting biological resources in the Parkway while ensuring a safe park environment.
Objective 4.5a Complete a baseline ambient night light survey to identify areas in the Parkway where there is an unnecessary amount of ambient light and create a plan for reducing the light, consistent with American River Parkway policies.

While the design plans hope to minimize ambient light, a baseline ambient

I96-9

night light survey should be performed.

I96-9 (Cont.)

Finally, the San Juan Unified School District does not have the credentials to approve the draft EIR. Because the project is adjacent to the American River Parkway, and the approved Parkway Plan has been adopted by the State Legislature as the Urban American River Parkway Preservation Act, either the State Natural Resources Agency or Sacramento County Regional Parks Department should be the approving organization, with assistance from the Sacramento County Community Development Department. It is impossible for the San Juan School District Board to review the DEIR objectively.

I96-10

Sincerely,

Original signed by

Peter Spaulding
2531 Rio Bravo Circle
Sacramento, CA 95826

cc: San Juan Unified School District Board Members (via emails)

Tanya Kravchuk, President	Manuel Perez, Vice President
Nick Bloise, Clerk	Zima Creason, Member
Pam Costa, Member	Ben Avey, Member

Letter I97

From:	Mary Starkey
To:	Rio Americano
Cc:	Mary Starkey
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 4:54:13 PM

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Report Suspicious

To whom it may concern, I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. Thank you for your consideration,

I97-1
I97-2
I97-3
I97-4
I97-5
I97-6
I97-7
I97-8
I97-9
I97-10
I97-11
I97-12
I97-13
I97-14
I97-15

Mary Starkey
Resident
Gold River, CA

Letter I98

From:	Sara Stephens
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public Comment on the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Project
Date:	Thursday, October 15, 2026 7:48:41 PM

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Below is my public comment submission for the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Project. Please add it to the official record. I98-1

To whom it may concern,

I have lived in the Sacramento area for more than 30 years, and the American River Parkway has long been an important part of my life. I walk in the Parkway several times a week specifically to immerse myself in nature and enjoy an escape from cars, traffic, and noise. I value the quiet, natural environment the Parkway provides, not only for people seeking a respite from everyday life, but, more importantly, for the wildlife that depend on this unique habitat. I98-2

I am also a parent whose two children attended San Juan Unified schools from kindergarten through 12th grade, and both played varsity sports. I understand the value of school athletics and the role they play in students' lives. My concerns about the proposed Rio Americano High School stadium are not about opposing school sports, but about whether this particular location is appropriate for a high-intensity sports and events venue. I98-3

The project includes an almost 800% increase in bleacher capacity, a substantial increase in noise and light pollution, additional traffic, and potential safety issues. I am concerned about the quality of life for nearby residents and the effects of these changes on the wildlife that depend on the Parkway's dark and quiet environment. I98-4

I am also troubled by the lack of an improved evacuation plan and security measures, which could leave students, parents, staff, and attendees at serious risk. I98-5

I understand the District's desire to have a stadium at every high school. However, I do not believe the proposed location at Rio Americano High School, alongside the state-protected American River Parkway, is appropriate for a high-intensity sports and events stadium. The Parkway is a treasured natural resource, and I believe its unique setting deserves careful consideration when decisions are made about development and activities along its boundaries. I98-6

Within the last ten years, the District added a track field at the proposed stadium location. Rather than intensifying the site's use with a large stadium and expanded events, I believe the campus presents an exceptional opportunity to develop a state-of-the-art science program that takes advantage of the Parkway as an educational resource. The opportunity for students to learn from this remarkable natural environment is one of a kind. I98-7

After reviewing the DEIR, I believe significant concerns remain unresolved. I ask the District to address the following issues fully before moving forward with this project. I98-8

Where the DEIR Falls Short I98-9

Event Noise

Noise pollution has been identified as significant and unavoidable, even after mitigation. If the proposed project cannot adequately mitigate its noise impacts, another alternative should be presented. Please explain how the proposed project complies with the Sacramento County Noise Ordinance.

Lighting I98-10

The DEIR must meaningfully evaluate glare, skyglow, light spectrum, and nighttime activities adjacent to the Parkway and river corridor. The Final Environmental Impact Report (FEIR) must require lighting that complies with the maximum light reduction achievable through DarkSky-oriented design. Protecting the natural darkness of this corridor is important for the wildlife that depend on it.

Incomplete Environmental Baseline and Project Description I98-11

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use, rather than relying on generalized “typical” operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and public address (PA) system limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I98-12
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I98-13

Biological Resources

The DEIR/FEIR must analyze the impacts of ongoing event operations along the Parkway on all wildlife, habitat, and recreational use. The effects of stadium activities should be evaluated in the context of the natural environment that makes this location so valuable. I98-14

Cumulative Impacts

The separately and improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations to ensure the combined impacts are adequately evaluated. I98-15

Parking and Traffic

The DEIR/FEIR must provide a parking and transportation model that accounts for the anticipated 3,500+ people expected to use this stadium and event center. Suggested offsite parking that is not secured is insufficient to address the project's parking and transportation needs. I98-16

I ask the District to take these concerns seriously and fully evaluate the project's environmental, neighborhood, and public safety impacts before making a final decision. The American River Parkway is an extraordinary natural resource in our community, and I believe we have a responsibility to protect the wildlife, recreational opportunities, and quality of life that make it so special. I98-17

Thank you for your consideration of my comments and for including them in the official record.

Sincerely,
Sara Stephens

Letter I99

From:	Stevens, Michelle L
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Cc:	juliegabele; barbara dugal; "Lisa Phenix"
Subject:	Comment Letter Draft EIR of the Rio Americano High School Stadium Project.
Date:	Friday, October 16, 2026 10:36:52 PM

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Report Suspicious

October 16, 2026

Subject: Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.

To whom it may concern, I99-1

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School. In this letter, I will respond to my personal area of expertise, the western pond turtle. We have conducted turtle nest surveys along the section of the lower American River adjacent to Rio Americano High School. We have conducted basking turtle surveys and nest surveys in this area of the river. I can personally document the presence of western pond turtles in this area. Since I did not trap turtles, I am unable to definitely state whether these are NW pond turtles. However, the turtles we have caught at Bushy Lake are definitely NW pond turtles. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway.

Although I understand the district's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. The lower American River Parkway is a significant wildlife habitat corridor. The Parkway itself has been fragmented, truncated and simplified. The last remaining habitat on the designated Wild and Scenic River is all significantly important.

Bushy Lake provides a reference baseline condition for the lower American River habitat. The Bushy Lake turtle basking surveys, nesting surveys, and mark-recapture sampling will provide information on baseline conditions to recommend temporal and spatial mitigation measures for turtle conservation (2024 Bushy Lake Conceptual Restoration Plan www.bushylake.com).

The project site is located approximately 350 feet from suitable aquatic habitat for the northwestern pond turtle in the American River. The DEIR acknowledges that suitable upland riparian habitat is present in the Parkway adjacent to the river, which may be

used by western pond turtles for basking, nesting, overwintering, cover, and dispersal.

The six years of turtle data based at Bushy Lake provides an excellent template for understanding when turtles emerge from brumation, when they nest, how far from water they nest, and some elements of nesting habitat. Basically, turtles brumate from November to late January/ early February depending on spring temperatures. Turtles begin nesting in April and continue to the end of July. There may be some nesting activity in August. The hatchlings emerge from their nests in late fall, although our information is based on literature rather than observation.

There are currently two recognized pond turtle species in California: Northwestern (*Actinemys marmorata*) and Southwestern (*Actinemys pallida*) (Spinks and Shaffer 2005; Spinks et al. 2010). The NW and SW Pond Turtles (WPT) are California's only native freshwater turtle species. The Western Pond Turtle is currently listed as a "species of special concern" in California (Thomson et al. 2016), The U.S. Fish and Wildlife Service initiated a status review for listing the NW Pond Turtle and SW Pond Turtle as Threatened under the U.S. Endangered Species Act (USFWS 2015). No action has been taken at this time.

Northwestern Pond Turtles have suffered a 99% decline in some areas and is listed as a species of special concern in California. Both NW and SW turtles are under review for listing as Threatened under the Federal Endangered Species Act. Western Pond Turtles are a Priority 3 Species of Special Concern in California (Thomson et al. 2016). Changing climate conditions, atmospheric rivers exacerbating severe flooding, ongoing drought, and wildfires magnify threats to WPT populations (Purcell et al. 2017). Urban populations of turtles are threatened by invasive species, particularly bullfrogs, non-native fish and Louisiana red crayfish (USFWS listing package). An abundance of non-native turtle species, particularly red eared sliders, additionally stress WPT populations.

On the lower American River corridor, riparian habitats have been fragmented and disturbed through urbanization and anthropogenic disturbance. The ecotone between aquatic habitat and terrestrial habitat that turtles rely on for nesting has been disturbed, making it dangerous for turtles to nest and nestlings to return safely to . On local streams, degradation of stream corridors, impaired water quality, wildfires, homeless encampments, and levee construction and maintenance all adversely impact turtle habitat. Bike and automobile strikes are also a problem for turtles.

I99-1 (Cont.)

<u>Pond Turtle Life History</u>

Pond turtles are known to mate throughout the spring, summer and fall. The red-eared slider and northwestern pond have been observed nesting from late April through the end of July (Alvarez, 2020; Stevens et al., 2024, USFWS 2015, Center for Biological Diversity 2021, von Ehrenkrook 2024). Adult gravid females travel from aquatic habitat into the terrestrial riparian habitat to construct subterranean nests and lay eggs. A study

I99-2

on the northwestern pond turtle (*Actinemys marmorata)* has recorded turtles traveling an average of 100 m from the water's edge for nesting, however, a southwestern pond turtle has additionally been observed traveling as far as 457 m away (Nerhus 2016). Based on Bushy Lake 2024 data collection, the mean nesting distance from water's edge is 77 meters, and nesting occurs primarily on southward-facing slopes and in medium-height vegetation (von Erhenkrook 2024). Turtles hatch in August and remain in their nests until late Feb-early March. Both nesting and hatchling recruitment characteristics vary by seasonal and inter-annual variability in precipitation and flooding.

I99-2 (Cont.)

The nesting process leaves individual turtles vulnerable to predators and anthropogenic disturbances. Turtles hatch from eggs in August and remain in their nests until late February-early March. Most female turtles create only a single nest, although there are records of double clutching (Goodman 1997, Germano and Bury 2001, Spinks et al. 2003, Germano and Rathbun 2008, Davidson and Alvarez 2020). Clutch sizes range from 1-11 eggs per clutch (Holland 1994, Lovich and Meyer 2002, Germano and Rathbun 2008).

The distance to nests from the water for both the pond turtles and non-native (NNT) ranges from an average of 100 m to as far away as 500 m (Storer 1930, Holland 1994, Reese 1996, Holte 1998, Lovich and Meyer 2002, Davidson and Alvarez 2020). Upon emergence, it takes several weeks for hatchlings to reach the water due to their small size, large distance to the water, and the unknown direction of water (Alvarez 2020). Hatchlings move between places of cover to avoid predators such as skunks, snakes, bullfrogs, and birds. They continue moving in arbitrary directions until a body of water is discovered (Ibid). A review of the literature on pond turtles indicates that there is a high degree of variability in life history characteristics; inter-species variation; and highly variable habitat characteristics such as duration and frequency of precipitation and flooding; water temperature and chemistry, and predation, food web and competition characteristics of the aquatic ecosystem (Ernst and Lovich 2009, Bury et al. 2012, Davison and Alvarez 2020).

<u>Mitigation Recommendations</u>

I99-3

- Ground disturbance in **suitable upland habitat within 500 feet of aquatic habitat** for northwestern pond turtle will be minimized, to greatest extent feasible.
- The target period for vegetation removal in these areas will be **mid-April to mid-May which is peak nesting season** *when potential for turtle strikes and direct impacts are lowest, if practical with combined seasonal limitations on construction*
- The following measures to minimize potential for heavy equipment to destroy northwestern pond turtle nests and to encounter hatchling turtles.
- § **Placing artificial ground cover** ??that prevents female turtles from excavating nests in **most likely nesting areas** where construction activities

will occur before the following hatchling turtle emergence

I99-3 (Cont.)

Incomplete Environmental Baseline and Project Description –

I99-4

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. For western pond turtles, nesting distance from water to terrestrial habitat is essential. Turtles are fully capable of nesting on the Rio Americano Campus. Data suggests turtles can travel an average of **100 m** from waters edge, and as far as **457 m** (von Ehrenkrook 2024). Turtles hatch in August and remain in their **nests late Feb-early March**. Hatchlings emerge in the fall and must make their way back to the water.

I99-5

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.

I99-6

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

Thank you for your consideration.

Regards,

Dr. Michelle Stevens, Emerita Professor CSU Sacramento

Telephone: 916-765-7397

Email: stevensm@csus.edu

Web: www.bushylake.com

Dr. Michelle Stevens
She, Her, Hers, Ella
Emeritus Professor, Environmental Studies Department
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Bushy Lake Web Site: www.bushylake.com
EAB appt: https://csus.campus.eab.com/pal/kbnSOHLIDb

Letter I100

From: Don J Stewart
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Wednesday, October 14, 2026 4:25:13 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I100-1 I100-2 I100-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I100-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I100-5

I have further outlined my concerns about the project and the DEIR below. I100-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I100-7
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I100-8
Incomplete Environmental Baseline and Project Description – I100-9

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I100-10 I100-11

• The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I100-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I100-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I100-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I100-15

The American River Parkway is simply the jewel of Sacramento's recreational areas. Please be a Steward of preservation! I100-16

Thank you for your consideration,

Don J Stewart
8614 Cliffwood Way
Sacramento, Ca 95826

Letter I101

From:	Sarah Strand
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 5:37:32 PM

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To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I101-1 I101-2 I101-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I101-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I101-5

I have further outlined my concerns about the project and the DEIR below. I101-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I101-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I101-8

Incomplete Environmental Baseline and Project Description – I101-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I101-10 I101-11
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I101-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I101-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I101-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I101-15

Thank you for your consideration,

Sarah Strand

Letter I102

From: dalev1616@aol.com
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: Comments on Rio Stadium DEIR SCH2026010094 Deficiencies 10/13/2026
Date: Tuesday, October 13, 2026 10:11:32 PM

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These are some of my concerns regarding the deficiencies of the DEIR SCH2026010094 for the proposed Rio Americano stadium project. I102-1
I request confirmation that you recieved this email and are including it in the administrative record, and request action to correct these deficiencies in the DEIR.

Extra Traffic and Parking I102-2
The parking that is proposed is so scattered and cluttered around the school, it is unreasonable and could not ever be achieved. If it was acheived, it would be hazardous to any responding emergency vehicles in case of an emergency.
That means street neighborhood parking will be impacted. There is no mention or consideration for how to handle the game night or graduation attendees parking and pedestrian traffic that will be created on the streets of Saveriegn, Morris, Wixford, Whitehall, and Picadilly. Jesuit provides parking and pedestrian monitors to help game attendees cross American River Drive and find parking. This DEIR lacks clarity on any of this and needs to be redone to consider these realist facts.

Lighting I102-3
There is no mention as to when all lights will be turned off after a stadium event ends, and who is responsible for that. I102-4 There is no meaningful evaluation for all this extra trespassing light onto the parkway and how it will affect the parkway native animals behavior and movements. It doesn't appear to me that all the lighting comply with all government hieght regulations and Dark Sky requirements. I102-5 More evaluation needs to be provided.

Dale Vaira neighbor of Rio 10/13/2026

Letter I103

From:	dalev1616@aol.com
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject:	comments on the Rio Stadium DEIR SCH2026010094 Deficiencies 10/14/2026
Date:	Wednesday, October 14, 2026 8:30:34 PM

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Report Suspicious

To: RioEIR@aecom.com
From: Dale Vaira Rio neighbor
Date: 10/14/2026

These are some of my concerns regarding the deficiencies of the DEIR SCH2026010094 for the proposed Rio Americano Stadium project. I103-1
I request confirmation that you received this email and are including it in the administrative record, and request action to correct these deficiencies in the DEIR.

Rio Americano High School does not have an adequate emergency evacuation plan for stadium games, graduation or other events. I103-2
The reason is that the stadium has never been used in that way. Any evacuation plan that exist is not adequate and outdated.
During a night time game, should an emergency happen, eg.[active shooter, fire, earthquake, bomb threat] Who is going to direct the 2,500 attendees plus players, cheer leaders, and coaches to saftey? Are the exit paths adequate? Which gates would be unlocked and open? Would parked cars be in the way of evacuees or responding emergency vehicles? Would these exit paths have proper lighting?
Do any of the exit paths included using the parkway or levee property? The DEIR does not address any of these concerns. This needs clarity.
A totaly new emergency evacuation plan must be created and provided, and approved by the Sacramento Fire Department.

The DEIR does not mention any type of game or graduation security, or how it would prevent a bad actor from using the parkway to enter the stadium and cause injury/death or other disruption and havoc. A comprehensive security plan must be created and provided, and approved by the Sacramento Sheriff Department.

Graduation: Currently over 4,000 people attend the graduation ceremony [not an average of 3,500] with standing room only, at the Sacramento Memorial Auditorium downtown. I103-3
The DEIR makes no mention of how that much seating could possibility arranged in the stadium to accommodate that many guest. Let alone how the school has enough parking for this event. There is no mention of how shade will be provided for those that would need it. More clarity is needed on how this event can happen. A seating arrangement must be provided and approved by the Sacramento Fire Department with capacity limits.
A separate parking plan must be provided.

Letter I104

From: dalev1616@aol.com
To: Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu; boardmembers@sanjuan.edu
Subject: Comments on Rio Stadium DEIR SCH2026010094 Deficiencies 10/15/2026
Date: Thursday, October 15, 2026 10:22:55 PM

This Message Is From an Untrusted Sender
You have not previously corresponded with this sender.

Report Suspicious

To: RioEIR@aecom.com
From: Dale Vaira Rio neighbor
Date 10/15/2026

These are some of my concerns regarding the deficiencies of the DEIR SCH2026010094 for the proposed Rio Americano Stadium project. I request confirmation that you received this email and are including it in the administrative record, and request action to correct these Deficiencies in the DEIR. I104-1

Tree Landscaping I104-2
There is a group of trees along the current football field, that border the property line of the high school, and the property line of the parkway at base edge of the levee.
These trees are an important part of the parkway ecosystem. The DEIR makes no mention as to the intention of the project to cut down or trim these Trees. We must have clarity on the disposition of these trees in the FEIR.
Are these trees to remain as is? to grow naturally?
Will these trees be cut down?
Will more trees be planted?
Will these trees be trimmed and if so, by whom?

Letter I105

Via Email (RioEIRComments@aecom.com)
Please Confirm Receipt of this Comment

To: RioEIRComments@aecom.com

From: Darlene Vaira
Date: October 15, 2026

Re: SJUSD, Rio Americano High School Stadium Proposal DEIR, SCH 2026010094: DEIR Deficiencies as to Emergency Plan For Evacuation of the Stadium

I am a neighbor of Rio Americano High School. I have lived here for 38 years. My daughter attended Rio. I volunteered at the school for over the 4 years my daughter attended and have supported almost every fundraiser that the school was having and still do support when students come to the door. During my time in the neighborhood I have watched as Rio American High School has increased enrollment through the years to almost 2,000 students. I105-1

I am writing about my concern for the DEIR deficiencies for the proposed Stadium at Rio Americano High School. With the proposed expanded seating to 2,575 The DEIR has not adequately addressed emergency access, evacuation procedures, crowd management and coordination with emergency responders and shelter-in-place procedures for the stadium when events are happening. I105-2

Rio Americano High School has only 3 entrances in and out of the school. They are all located on American River Drive, and are all located within 200 feet of each other. Rio Americano also has only one entrance into the football stadium. The perimeter of the stadium is fenced with locked gates.

The DEIR must provide plans on evacuating people from the stadium in the event of an emergency like a shooter, bomb threat, fire, flood or earthquake. And also provide plans for getting police officers, fire fighters and paramedics onto campus in the event of an emergency.

The DEIR must address traffic gridlock on American River Drive and also spectators leaving on foot while drivers are trying to exit the parking lots, and adjoining streets where cars will be parked because of inadequate parking availability on campus. I105-3

The DEIR does not address the perimeter fencing where there are locked gates. Who controls them and can emergency responders have access to open them. Also would there be someone to open the gates for attendees at events to evacuate through? I105-4

Recently on September 5, 2026 gun shots were fired at parking structure 3 close to Sacramento State Football Stadium while their home opening game was being played. Although no injuries were reported the police issues a shelter-in-place order for the stadium. I105-5

A 2nd shooting event happened close to Sacramento on September 11,2026 at the Manteca High School while a football game was underway.

On October 6, 2026 at the California Montessori Project American River campus in Fair Oaks California was evacuated after receiving a Bomb Threat.

Our neighborhood does not make us immune to these kinds of events happening. That is why it is so important to have planning in place for shootings, fire, bomb threats, flood or earthquakes. The DEIR does not satisfy this by stating that they have procedures for the students when they are in class.

Another item the DEIR does not address is if there is an event at Jesuit High School Stadium,that is less than 3 blocks away, at the same time that Rio Americano High School is using their stadium. The impact could significantly impact and insight chaos with evacuation spectators, gridlock of vehicles and delaying emergency response with police, fire engines, and ambulances while trying to reach one or both campuses. Please note that there are no two high school campuses in the Sacramento area or in California (that I could find) that have two stadiums with that close of a proximity. (Within ¼ mile). This makes for double the chaos. I105-6

I request the Districts DEIR provide a detailed analysis that accounts for the Evacuation of the Stadium and their Plans for Emergency Responders.

Specifically I request answers to the following questions before the final approval of the stadium: I105-7

1. Detailed Evacuation Plan for the Stadium for all events.
2. Detailed Plans for Emergency Responders to get to the stadium in a timely manner.
3. Detailed Plan of who controls the locked gates around the stadium. Will there be a person who mans the gates at all events? Do Emergency Responders have access to those locked gates?
4. Detailed Plan for addressing Gridlock of American River Drive, Savereign, and Fair Oaks Blvd.
5. Plans for a double evacuation should Jesuit High School have an event the same day.
6. The DEIR must have these plans approved by the County Of Sacramento Sheriffs Depart, CHP and Sacramento Fire.

The community deserves to understand what these evacuation plans are and if they will be effective. I respectively request that these impacts be fully evaluated before the project is approved and that there is an added follow-up for public review. I respectively request that a more complete, further DEIR be presented to the public before a FEIR is presented to the District for approval. It was represented that this would be a Focused EIR. The delivered DEIR I105-8

is anything but that. It is not sufficient to accurately inform the public or the District to properly assess and approve the proposal. I105-8 (Cont.)

Thank you for the opportunity to comment. Please make my comments part of the administrative record, and provide a written response to the points raised above. I105-9

Yours truly,
Darlene Vaira, Rio Neighbor, Mom of Rio Alum

Letter I106

Via Email (RioEIRComments@aecom.com)

To: RioEIRComments@aecom.com

From: Darlene Vaira
Date: October 15, 2026

Re: SJUSD, Rio Americano High School Proposal DEIR, SCH 2026010094, Deficiencies as to Neighborhood Security and Safety

I am a neighbor of Rio Americano High School. I have lived here for over 38 years. Over the years I have witnessed trash along American River Drive and in front of the school. A couple years ago we had an incident in front of our home where our guests had parked their mini cooper car. In the morning it was found with maple syrup and flour poured all over it . This combination of syrup and flour was like glue and seeped down into the doors. It was very costly to get detailed. Rio Americano had a school Dance that night. Although, I cannot prove it was a student from Rio. I would call it a coincidence. I did report it to Rio, Jesuit and our Neighborhood Association. I106-1

With the Proposed Stadium Project at Rio Americano High School, I am very concerned for the safety of our neighborhood, trespassing, property damage, waste and litter and other disturbances that will affect our neighborhood and our quality of life if this stadium is approved. I106-2

With the capacity of approximately 2,575 people, many who do not live in the neighborhood, the possibility of our property and our homes being damaged and disrespected is a real concern.

The DEIR has not touched on Security and Safety for the neighborhood. The larger crowds may generate food packaging, drink containers, and other trash that could be left on sidewalks, streets, residential properties and areas adjacent to the American River Parkway. Also, trespassing, and other disturbances. The DEIR does not identify who will be responsible for cleanup beyond school property and how complaints will be addressed.

I request that the DEIR provide details on Security and Safety analysis for the surrounding neighborhood.

Specifically, I request answers to the following questions before the final approval of the stadium: I106-3

1. The District must include in the DEIR what event management and security procedures they have in place: including staffing before and after events, monitoring parking areas, pedestrian routes, coordinating with law enforcement and a procedure for residents to report problems.
2. The District must include in the DEIR how it will respond to event related damage or disturbances affecting neighboring properties.

3. The District must include in the DEIR how it will provide safety to residents and attendees crossing streets to avoid potential injuries.
4. The District must address in the DEIR if there will be clearly designated and illuminated crossings, crossing agents, traffic control, parking restrictions, and safe pedestrian routes. I suggest that you coordinate County Transportation officials.

I106-4

The neighborhood deserves to understand what security and safety measures that Rio Americano intends to provide. I respectively request that these impacts be fully evaluated before the project is approved and that there is an added follow up for public review. I also request that a more complete DEIR be presented to the public before a FEIR is presented to the District for approval. The DEIR that was released to the public was not a Focused EIR. It is not sufficient to accurately inform the public or the District to assess and approve the project

I106-5

Thank you for the opportunity to comment . We are all law-abiding citizens and pay very high taxes in our neighborhood, which goes to the San Juan Unified School District. We take pride in our neighborhood and that is why it has become a very desirable place to live and raise a family. We are good neighbors to Rio and we ask that you be the same.

I106-6

Please make my comments part of the administrative record, and provide a written response to the points raised above.

Yours truly,
Darlene Vaira, Rio Neighbor, or of Rio Alum

Letter I107

Via Email (RioEIRComments@aecom.com)
Please Confirm Receipt of this Comment

To: RioEIR@aecom.com
From: Darlene Vaira
Date: 10/15/26
RE: SJUSD, Rio Americano High School Stadium Proposal DEIR, SCH 2026010094: DEIR Deficiencies as to Lighting and Noise Impact on the Neighborhood and American River Parkway and Requestioned Actions

I am the mother of a Rio Alum. I have lived essentially nextdoor to Rio Americano High School for 38 years. In addition to my daughter attending Rio, my family has used the parkway for many many years and we still use it today. It was one of the reasons we chose the neighborhood, and we have easy access to the Parkway at the end of our street. I107-1

Rio Americano High School sits adjacent to the American River Parkway. This is not just open space. It is a natural and recreational corridor for animals, birds and people. I107-2

Rio Americano High School Stadium Project includes 4 permanent light poles 80 feet tall, 6 pedestrian lights, expanded seating to 2575, a large press box and an upgraded public address system next the American River Parkway.

The DEIR does not adequately address how these changes are going to affect the parkway and nearby homes. The American River Parkway is home to many species of wildlife and nesting birds. But it is also enjoyed by many people who walk the trails or the levy, or cycle, who enjoy the quiet peaceful serenity the Parkway offers. With increased stadium size, amplified sound during the day and night, lighting and event activity, the Stadium will affect this sensitive environment.

LIGHTING
The lighting of the stadium poses a risk for spill light, glare and sky glow reaching the Parkway and nearby homes. The DEIR has not addressed how the lighting analysis accounts for conditions along the Parkway itself or for the intrusive light that affects neighboring backyards and homes. It has only addressed the playing fields and the school property. The analysis needs to address light reaching trees, vegetation, wildlife habitats, (especially nocturnal animals and birds), trails and nearby residences during AND after events end. I107-3

The DEIR has not proposed operating hours, lightening intensity, and how to prevent unnecessary illumination outside the stadium. The DEIR has not looked into less intrusive lighting alternatives.

NOISE I107-4

The proposed Rio Stadium will seriously impact my quality of life as a Rio neighboring home owner. We have some sound now and we have accepted this as part of living near Rio.

I107-4 (Cont.)

We support Rio athletics; my daughter played basketball and soccer. We also support a good Rio education. This present proposal however, will dramatically increase noise to the point of being a public nuisance to the neighbors unless there are strict rules as to volume, and automatic sound shut off if agreed upon volume levels are exceeded. The DEIR fails to include these necessary requirements.

Moreover, as a neighbor, I will not know when this intrusion will occur. Once my daughter graduated, I no longer received information from Rio regarding events that would affect my enjoyment of my own home. I asked to get this information. This request was denied as I no longer had a student at Rio. This is not respectful to the neighborhood. If I have an event, I let my neighbors know. I would request to be treated the same. The DEIR fails to include a notification to neighbors necessary to properly prepare neighbors for anticipated noise, glare, traffic, and safety concerns. And if there's a problem, the DEIR fails to establish a contact person and process to address legitimate neighborhood needs.

Also, the proposed Rio Americano's Stadium noise will affect wildlife and Parkway recreational use day and night. With an increase of usage and capacity; announcements, music, whistles, crowd cheering will be audible to users of the parkway who are looking for some peace and quiet. Moreover, the DEIR fails to evaluate this. With alot more practices, games and other events intended at Rio, many to extend into late night time, meaningful sound testing and assessment is required beyond Rio's property line.

I107-5

With Jesuit already having a stadium, the noise would double. This cumulative impact is also not adequately addressed.

I107-6

Moreover, its obvious that noise from the proposed stadium would cause wildlife to flee or avoid these areas. The noise can mask calls that wildlife use for communication and make warnings for predators. Once the damage is done these species of wildlife and birds may never return.

I107-7

The benefits of this wildlife in terms of recreation, tranquility and education are profound. No other school to my knowledge has a sensitive ecosystem, like this Parkway right behind it to offer our students the education of a lifetime and a respite from modern society. With the reality that the proposed Stadium is adjacent to the Parkway, the DEIR must meaningfully address how to protect the Parkway from lighting and noise. I would respectfully request that a more in depth DEIR be conducted.

I would request that the District address the following in the FEIR:

I107-8

1. Conduct or identify acoustic locations that estimate stadium noise at representative locations along the American River Parkway, including nearby trails, wildlife habitat, and residential properties.

2. Provide projected sound levels for announcements, using whistles, and crowd noise during realistic high attendance events, including peak levels and duration of exposure. This could be done at El Camino Fundamental High, where Rio football games have been played at night for years. I107-9
3. Explain how the analysis accounts for background noise, existing traffic, evening conditions, and repeated events during the athletic season and for other events that Rio Americano High School will have, including but not limited to, graduation. How will the proposed stadium accommodate an event as large as graduation and do so safely? I107-10
4. Evaluate potential effects on birds and other wildlife, including whether noise and lighting could interfere with communication, nesting, feeding, roosting, or habitat use. I107-11
5. Identify and require enforceable limits on amplified sound, speaker direction, volume, operating hours, and event duration and explain how compliance would be monitored. I107-12
6. Establish a noise monitoring and complaint response process that includes appropriate locations along the Parkway and surrounding neighborhood. This process requires a contact person and automatic sound and light shut off at a designated time and under designated circumstances. I107-13
7. Evaluate feasible measures to reduce noise, including speaker placement and directional controls, lower amplification levels, restrictions on unnecessary announcements and music and limits on late evening events. I107-14

The community deserves to understand not only how loud the stadium is expected to be within the school grounds, but also how far the sound may travel and how frequently it may affect the Parkway, wildlife and neighboring residents, even across the river as sound travels farther at night. I request that these impacts be fully evaluated and that effective, enforceable mitigation be established before the project is approved and there is an added step for a follow up public review. I respectfully request that a more complete, further DEIR be presented to the public for review and follow up comment BEFORE a FEIR is presented to the District for approval. It was represented that this would be a Focused EIR. The delivered DEIR is not sufficient to adequately accurately inform the public or the District to properly assess and approve the proposal. I107-15

Thank you for the opportunity to comment. Please make my comments part of the administrative record, and provide written a response to the points raised above. I107-16

Yours Truly,

Darlene Vaira, Mom of Rio Alum, Rio Neighbor, and Parkway User

Letter I108

Via Email (RioEIRComments@aecom.com)

To: RioEIRComments@aecom.com

From: Darlene Vaira
Date: October 15,2026

Re: SJUSD, Rio Americano High School Proposal DEIR, SCH 2026010094, Deficiencies as to Parking for Stadium Events

I am a neighbor of Rio Americano High School. I have lived next door to Rio's Campus for 38 years. Over the years I have witnessed increased enrollment. When my daughter attended Rio Americano High School. The enrollment was approximately 1,300 students. Now it is close to 2,000 students (not including more staff). As a result of Rio's inability to provide campus parking for all its students, our side streets around Rio's Campus have become heavily impacted with cars all day, 5 days a week, where we can't park in front of our own homes. I108-1

Now with the Stadium Proposal I am deeply concerned that Rio American High School's existing parking supply is insufficient to accommodate the additional demand associated with the proposed stadium project and their events, as they cannot provide it to the students attending right now.

This raises the fundamental question: Where will additional vehicles park when stadium events take place while the school is operating, particularly when events occur during the week and weekends?

I am concerned that insufficient on-site parking could result in spectators parking on **more** surrounding residential streets. Therefore, increased traffic searching for spaces, blocked driveways, reduced visibility at intersections, parking in no parking zones, and additional traffic congestion for residents and emergency vehicles.

I request that the Districts DEIR provide a detailed parking demand analysis that accounts for the proposed full capacity, including spectators, students, coaches, officials, and event staff. The analysis should consider events held during normal school hours, weekday evening events, weekends and simultaneous events at nearby Jesuit High School, (which is located less than ¼ mile from Rio Americano High School).

Specifically I request answers to the following questions before the final approval of the stadium: I108-2

1. How many parking spaces are currently available on campus, and how many are expected to be available during a stadium event?
2. What is the projected number of vehicles associated with a sold-out event, and what calculations are used for vehicle occupancy and the number of people arriving by other means?

3. Where will overflow parking be provided if on-campus spaces are full?
4. Has the District secured permission to use any proposed off-site parking areas, and how would spectators safely travel between those locations and the stadium?
5. What measures will prevent event attendees from occupying residential streets, blocking driveways, sidewalks, intersections, no parking areas and emergency access routes?
6. How will parking and traffic be managed when stadium events overlap with the regular school day or events at Jesuit High School?
7. Will the District monitor parking conditions and enforce a parking-management plan, and what actions will be taken if available parking supply is inadequate?
8. Will the District have a plan for residents lodging parking complaints and how will it be handled?

I108-2 (Cont.)

I request the District identify the supporting data and analysis in the DEIR and explain whether the proposed project would worsen existing parking and traffic conditions. If the analysis does not adequately account for existing weekday parking demand, realistic event attendance, and cumulative demand from simultaneous events, I request additional analysis and appropriate mitigation before project approval.

I108-3

The surrounding neighborhood should not be treated as an informal overflow parking lot. The District must demonstrate that the stadium can operate at its proposed capacity without imposing unreasonable parking, traffic, and safety burdens on neighboring residents. As the DEIR does not address these issues, I respectfully request that a more complete DEIR be presented to the public for review and follow up comment before a FEIR is presented to the District for approval. The delivered DEIR, as presented, currently does not address parking properly to approve the proposal.

Thank you for the opportunity to comment. Please make my comments part of the administrative record, and provide a response to the points raised above

I108-4

Your truly,
Darlene Vaira, Rio Neighbor, Mom of Alum

Letter I109

Mr. Phil Vercruyssen
630 Whitehall Way
Sacramento, CA 95864-6169

NICHOLAS ARPS
DIRECTOR of FACILITIES : MODERNIZATION
SAN JUAN Unified School District
3738 Walnut AVE.
CARICHEEL CA
95608

October 15, 2026

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

FROM: Philip Vercruyssen

(Because I do not have a computer to email you all easily, please share with rioEIR@aecom.com, Suzanne.McFerran@aecom.com, mbassanelli@sanjuan.edu, boardmembers@sanjuan.edu, frank.camarda@sanjuan.edu) I109-1

Please Confirm Receipt of this Comment by U.S. Mail
Please Confirm that the parties to be emailed were properly emailed

RE: Rio Americano High School Stadium Improvements Project, Draft EIR (DEIR) Report SCH Number 2026010094 I109-2

My name is Philip Vercruyssen and I live on Whitehall Way on the east side next to Rio Americano High School (Rio). I have lived here for 33 years. Rio is on American River Drive and abuts the American River Parkway.

My two children graduated from Rio. My son played football; my daughter swam and played volleyball. My 4 grandchildren will likely attend Rio and presently attend nearby Del Dayo Elementary School, which is also essentially on American River Drive. The following is my response to the DEIR. You must forgive me, I have never responded to a DEIR before, but I do have vital comments.

I would like to open by saying the title for the DEIR is in error. Rio does NOT have a stadium, it has an athletic field. This is NOT an improvement. I109-3

In the Executive Summary regarding lighting it says lighting would be used on select evenings to accommodate practices, and "competitions." Please define "select evenings" and when light go off. I109-4

I am in favor of a "No Project Alternative". Rio has used the El Camino High School (E.C.) field for years. Why reinvent the wheel? I109-5

On page 1-4, the DEIR says, "should the design not meet program guidelines, the District "will refine and resubmit". I respectfully request that the DEIR be revised to actually offer a design that does in fact meet program guidelines. Once this is accomplished, please submit the revised DEIR for public review. I109-6

On Page 1-8 Nest Avoidance- the EIR speaks to "normal" bird behavior. The DEIR does not define what it refers to as "normal bird behavior. This failure to define this term essentially nullifies this Mitigation Measure. Please require an independent impartial biologist. Further, at the outset, prior to assessment, establish behaviors that would be relied upon to support "normal" bird behavior. I respectfully request no construction or activity during bird nesting season. I109-7

Page 1-11 Public Address system…- "minimal spillover", please define. This mitigation measure fails to describe how minimal spillover is defined and how it will be measured. Moreover, there does not appear to be an enforcement mechanism listed. Please require automatic shut off of the Public address system if it exceeds agreed upon levels of sound. I109-8

Page 1-12 Scheduling- the DEIR fails to adequately require District responsibility as to sound levels late at night. Please limit evening events to 10pm, with football overtime as the only exception. All other events would be within the District's control to terminate by the 10pm requirement. I109-9

Page 1-13 Noise reducing treatments on bleachers not required. The DEIR fails to factually assess the need for bleacher step surface noise reducing treatment. Please require a study of this technology and how it would properly dampen sound for the neighborhood and surrounding Parkway. I109-10

Page 1-14 &15 Event Transportation Management Plan (TMP) - the DEIR fails to factually explain in meaningful detail this proposed plan. Moreover, it allows for unpredictable, inconsistent and unsafe for revision based on queuing exceedances that are not factually described. Please actually study at least 3 high attendance Rio nighttime football games at El Camino Fundamental High School. Document transportation management processes, correlate it to the more limited access at Rio due to the Parkway being a barrier. Consult with County traffic, and safety providers like the Sheriff's and Park Ranger's office. Revise this DEIR section with a more fully factually supported TMP, and provide a reviewed DEIR for public review. I109-11

Page 3-6 Comparing Schedule of Uses with table 3-1 at page 3-9, there could be as many as 150 events per year on the field, 3 per week. The DEIR fails to address I109-12

the facts of this substantial increase in activity on the campus, neighborhood, and parkway next to it. Please study comparable impacts at El Camino Fundamental High School Adjust said study for the sensitive nature of the Parkway and its natural barrier to egress, revise the DEIR with this necessary information and resubmit for public assessment. This additional impact would likely result in a public nuisance for my neighborhood.

I109-12 (Cont.)

On Page 3-10, 3.4 Project Objectives. Rio as a Center of Community, intends to drastically expand Rio's use for events. The DEIR fails to describe how these events will be managed, supervised. Please describe in detail the management plan for such events including but not limited to a Rio onsite person in charge and protocol for issues as they arise to protect students, attendees, neighbors and the parkway.

I109-13

On Page 4, 1-9 in the Light and Glare section, the DEIR mentions portable diesel powered generators for lights. I did not receive notice regarding these lights. They smell awful and pollute the campus and community where our children, grandchildren and neighborhood students spend hours per day. This is unhealthy. Please replace them immediately with battery operated lights.

I109-14

On Page 4.1-14 The American River Parkway Plan acts as management plan for the state & federal Wild & Scenic Rivers Act. The DEIR improperly concludes here that the Parkway Plan does not directly apply to the proposed project. I respectfully direct AECOM to the Urban American River Parkway Preservation Act (UARPPA) which makes the Parkway Plan the management plan for all state projects. Update and correct the DEIR to show this, and apply these requirements throughout the DEIR and resubmit it for public review.

I109-15

On Page 4.1-16, the DEIR acknowledged the "light trespass" and "glare". ON page 4.1-17, the DEIR improperly states the project site is not visible from the American River Parkway. I can stand on the parkway right now and see the goal posts on the track field. I respectfully ask AECOM to go see the site and stand in the parkway and evaluate this project factual. Please revise the DEIR to accurately state the facts of visual intrusion on the Parkway. Since the underlying facts are inaccurate, the DEIR incorrectly concludes the visual character impact would be less than significant. This must be corrected.

I109-16

Page 4.1-18-24, Impact 4.1-1 talks about a new substantial source of light etc. It acknowledges lights could be on til 11:00pm, there could be 40 night events 88 night practices totaling 128 night activites, etc. This is exorbitant for this small

I109-17

residential community along the State protected American River Parkway. Moreover, the DEIR refers to an existing power structure to light the field which includes 64 circuits, suggesting this is massive. Please explain in detail what power and lighting infrastructure exists. What power and lighting infrastructure is intended to be added. Please advise if this referenced 64 circuits presently exists or is intended to be created? If so, please study why it would be needed or not needed to meet proposed light needs. Please revise the DEIR with this factual information and allow for public comment. I109-17 (Cont.)

On Page 4.1-25 & 26- the expert modeling conclusion shows the modeling failed to review light trespass on neighboring street, Whitehall Way. The DEIR is incomplete without this assessment. I respectfully request that Expert modeling be done at Whitehall Way at night under appropriate factual conditions, to accurately value and assess light trespass at Whitehall Way for these affected neighbors. Please add this assessment to a revised DEIR and resubmit it for public comment. I109-18

On Page 4.2-4-5-6-7. Special Status Species- I can vouch for 3 of the birds on the list- White Tailed Kite, Song Sparrow, Swainson's Hawk. I am lucky enough to have a pool and swim 7 or 8 months a year. Almost every time I swim, I will see 1 or all 3 of the birds listed here. It is especially delightful to see a Hawk ride a thermal. I request the DEIR be updated to include compliance with the American River Parkway Plan as is required by the Urban American River Parkway Preservation Act and maximally protect all listed species., Do not alter their habitat by building this project. Moreover, see attached 2/4/26 Liz Bellas, Director of Regional Parks interpretation of how these protected species will be harmed. I109-19

On Page 4.2-16 & 17, the DEIR acknowledges the potential significance of Construction on protected wildlife. I request the DEIR be updated to include compliance with the American River Parkway Plan as is required by the Urban American River Parkway Preservation Act and maximally protect all listed species. Do not alter their habitat by building this project. I109-20

On Page 4.2-21 in the Noise section, the DEIR improperly concludes that noise would be a less than significant impact because it fails to integrate the noise information with the substantial increase in events. Taking this information together, the less than significant conclusion appears lacking. Please integrate these concerns with light to make a complete significance assessment. I109-21

On Page 4.2-25-Again, noise is "less than significant" because it is "infrequent". The DEIR fails however to show any factual assessment on how intermittent sound I109-22

impacts wildlife. Please do an adequate biological assessment on how stadium sound of this magnitude, even it intermittent, affects wildlife along the Parkway. Again, I refer you to Parks Director Bellas' letter submitted to the District 2/4/26. I109-22 (Cont.)

On Page 4.2-26 & 27, the DEIR improperly ignores the District's duty to comply with the Parkway Plan per the UARPPA. Please correct. I109-23

For efficiency's sake, I will note the section and my concern. I respectfully request that the DEIR be revised as to the points raised to assure the point is integrated into a comprehensive assessment. Once thoroughly assessed, please submit to the public a revised DEIR for review. I109-24

On page 4.3-16- County code exempts "school bands, school athletics and school entertainment events" from noise ordinance. Although this may be true, this noise concern must consider its proximity to the Parkway. I109-25

On Page 4.3-18- Noise and lights, the estimated 153 event increase with lights must consider its proximity to the Parkway. I109-26

On Page 4.3-20- Traffic increases pre & post events. At estimated 3 times a week must be factored into a comprehensive enforceable TMP. I109-27

On Page 4.3-22 School sanctioned community events are mentioned. These should be limited due to the proximity to the sensitive Parkway I109-28

On Page 4.3-25-PA- Speakers shall be mounted to "minimize spillover." Please confirm with independent acoustic expert that that spillover is minimized completely and consider shut off earlier than 10:00 pm. I109-29

On Page 4.3-27- "some sound sources cannot be fully controlled...event noise impact would remain significant and unavoidable." Based on this conclusion, and the proximity to the Parkway, serious consideration for the no project alternative is necessary. I109-30

On Page 4.4-1- In the Transportation and Circulation Section, the DEIR completely fails to include Whitehall Way which runs right along the campus and is inundated daily with traffic and parking. Please revise this study to include this important neighborhood street. I109-31

Page 4.4-13- "Night Event Management Standards" and the Mitigation Measure 4.4-3b 8 items, This section uses the permissive "would" rather than "shall". The DEIR must include specific details about Night Event Management Standards which include but are not limited to who is in charge, how neighbors can contact the person in charge, what enforceable limits will be imposed when there is too many people, too much light, too much sound , too much traffic, illegally parking and unsafe conditions. Also, neighbors need to be notified in writing prior to big events and given a way to contact the person in charge. Queues could interfere with emergency access. I109-32

On Page 5.9-30- Says the project impact "less than significant." The DEIR fails to comply with the Parkway Plan, the UARPPA, and give the necessary weight to the 2/4/26 Parks Director letter, attached. Please reassess. I109-33

On Page 5.12-32- Police Protection "No Impact"- This lacks factual basis. Please reach out and consult with the Sacramento County Sheriff's Department, County parking enforcement, CHP, Sacramento Metro Fire, and Park Ranger's office to accurately assess the impact of this large stadium against the Parkway. I109-34

On Page 5-13-33- Recreation, page 5.13-33, Impact 5.13-1- Clearly adding a stadium to Rio against the fenceline of the Parkway which is at risk of fire and flood, will require costly maintenance. The DEIR fails to address this expense. Please revise the DEIR to reflect all anticipated maintenance and improvement costs, modeling off of nearby El Camino and add the costs associated with the sensitive location. Revise the DEIR and resubmit it to the public for review. I109-35

Impact 5.13-2- This section includes the sentence, "The proposed project does <u>not</u> include new recreational facilities…". The DEIR does not accurately represent this proposed project. This is a track field. This project <u>does</u> include new recreational facilities. The DEIR should remove the word "not" from the phrase at the beginning of this paragraph. This section also refers to community events that remain undefined. Please update the DEIR to define this phrase and accurately advise how many community events are intended annually. I109-36

Page 5.14-35-the conclusion in the 5.14 Utilities and Service Systems section is incomplete. No bathrooms are listed. I know parents who have advised that their student is stuck in long lines at Rio bathrooms now. Please revise the DEIR to include information regarding bathroom access for 2-3000 people including disabled access. I109-37

Page 6-3, Item 6.2.2- Project Objectives- The DEIR fails to describe what is meant by Rio becoming a Center of Community which includes other special and regular events and expand to host athletics & non -athletic events. Once my Rio student graduated, Rio terminated connection with me as a parent. I was no longer considered part of the community. Due to the sensitive nature of the parkway next door, this is not an appropriation location for increased events. Please update the DEIR to minimize outside events, with a declared cap, and minimize night events with a cap and limit day events with a cap. Please consider practice immediately after school. I109-37 (Cont.)

On page, 6-4, Item 6.3.2- This is feasible. Maximize morning practice when light, and maximize after school practice for the short duration of winter that is dark before school. I109-38

On page 6-4, Item 6.4.1- No project alternative, is the best alternative under the circumstances. I did not receive notice on the diesel lights. They are recent, in the last few years and are an avoidable public nuisance. It is inappropriate for the District to use them as a tool to justify a massive loud, brightly lit stadium. Please replace toxic temporary diesel powered lights with battery electric powered temporary lights if Rio cannot simply adjust its practice schedule to practice during daylight. Considering the proximity to the Parkway, and its educational value to ALL DISTRICT students, the Stadium project is of lesser value. I109-39

On Page 7-2 as to Cumulative Impact Analysis. I respectfully disagree with the DEIR conclusions throughout this section asserting 1) no need for cumulative analysis, 2) less than cumulatively considerable contributions, and less than significant conclusions. I agree that light and glare and noise are significant. I disagree that they are unavoidable. The DEIR is deficient in so many areas; meaningful traffic, light, noise biological assessment to name a few. I109-40

On Page 7-13 Since the DEIR's traffic study is inadequate and incomplete, the DEIR needs to revise this study. Mitigation proposed without enforceable mechanics is not reliable and contrary to CEQA. The event management plan proposed lacks teeth. The District will need boots on the ground to help plus the Sheriff and all at extra cost. I109-41

This is a want, a desire for a sports stadium; this is not an educational need. The DEIR needs to do a complete traffic parking simulation, apply the UARPPA, all the Parkway Plan requirements, communicate meaningfully with agencies relating I109-42

to traffic, safety, parkway, etc, to meaningfully evaluate whether this stadium can lawfully and wisely be placed here.

I109-42 (Cont.)

If you go back to page 4-17, the last sentence reads…"because residences are located close to 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. "

I109-43

Conclusions

-the proposed project is unnecessary and degrades the neighborhood. I have been a good neighbor to Rio for over 30 years; I request the same.

-I am and will forever be vehemently opposed to this project. My son played football at Rio for 4 years and all home games were E.C. It worked well.

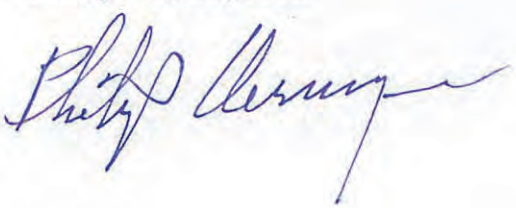
- The lights, the noise, the traffic, but MOST IMPORTANTLY, the profound affect on the American River Parkway, which acts as a management plan for the State of California and Federal Wild and Scenic River's Act and is protected by UARPPA. This project will have a deleterious effect on the American River Parkway. There can be no doubt.

- The words the author of this DEIR document seem to lean on, and there are many examples "… infrequent, potential, not significant, long term, short term." All terms are superficial, nebulous and tend to obfuscate. I am requesting a written response to my questions with explanations, definitions and timelines. Attached is a letter from the County Director or Regional Parks, Liz Bellas, giving the most coherent issues regarding this project.

I109-44

Respectfully,

Philip Vercruyssen



Department of Regional Parks
Liz Bellas
Director

County of Sacramento

Office of the County Executive
David Villanueva
County Executive

Community Services
Dave Defanti
Deputy County Executive

February 4, 2026

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

Subject: Notice of Preparation for an Environmental Impact Report and Initial Study for the Rio Americano High School Stadium Improvements

Dear Mr. Arps,

The Sacramento County Department of Regional Parks (Regional Parks) has reviewed the Notice of Preparation (NOP) associated with the proposed stadium improvements at Rio Americano High School (RAHS). This campus is directly adjacent to the American River Parkway (Parkway), which stretches from Nimbus Dam to the Sacramento River confluence and is designated as a Wild and Scenic River under both State (1972) and Federal (1981) law.

Protection of its core values is governed by the American River Parkway Plan (Parkway Plan), adopted under the Urban American River Parkway Preservation Act (California Public Resources Code Section 5840). As the entity primarily responsible for administering the Parkway Plan, Regional Parks reviews projects within and adjacent to the Parkway to ensure consistency with the Plan's policies and goals, including the goals and objectives outlined in the associated Natural Resources Management Plan (2023).

Regional Parks' review is focused on the project's location within the Parkway Corridor (PC) Overlay Zone, which implements Parkway Plan Policy 7.24 regarding the design and location of adjacent development. This policy and the associated overlay zone provide specific standards for height, color, texture, and scale to minimize adverse impacts on the Parkway's aesthetic and natural resources. The key components of the proposed stadium enhancements considered during our consistency review include:

- **Lighting System:** Four permanent 80-foot-tall high-mast light poles at the stadium and six 15-foot-tall pedestrian light poles providing nighttime visibility between the stadium and parking area.
- **Seating and Capacity:** Replacement of existing bleachers to accommodate a total capacity of approximately 2,500 people, representing a significant intensification of use near the Parkway boundary.
- **Facility Upgrades:** Construction of a new press box on the south bleacher section and an upgrade to the stadium's existing PA system.

As currently proposed, the RAHS Stadium Improvements would adversely impact the aesthetic and biological values of the Wild and Scenic Parkway. Specifically, the proposed lighting system and the currently planned cell tower would be highly visible from within the Parkway corridor. The introduction of a powerful new light source, combined with increased noise from expanded stadium capacity, would degrade the Parkway's natural aesthetic.

Furthermore, both light and noise—compounded by the presence of a cell tower—can severely impact wildlife. Artificial light disrupts circadian rhythms, creates navigational confusion for migratory birds, and alters predator-prey dynamics. The addition of a cell tower introduces further hazards, including increased avian collision risks—particularly for birds already disoriented by stadium lighting—and potential electromagnetic interference with animal navigation.

Simultaneously, increased noise contributes to habitat fragmentation and physiological stress while masking vital wildlife vocalizations used for mating, territorial defense, and predator detection. These cumulative impacts are especially critical given the project's location adjacent to the Parkway's narrowest reach, where the wildlife corridor bottlenecks for approximately six miles.

To avoid or significantly reduce these impacts, the Environmental Impact Report (EIR) should evaluate alternatives such as establishing a substantial woodland buffer on the campus boundary and relocating the stadium to the northern portion of the campus adjacent to American River Drive. The State Wild and Scenic designation and the State-adopted Parkway Plan emphasize the regional importance of this river corridor. While the San Juan Unified School District operates as a local educational agency, it remains subject to the State of California's environmental regulations and the mandates of the Wild and Scenic Rivers Act. It is imperative for the health of the Parkway ecosystem that the district ensures full compliance with these laws and planning documents to protect the integrity of the Parkway's protected values.

Liz Bellas,
Director of Regional Parks

Letter I110

From: Ginny Volk-Anderson
To: Rio Americano
Subject: Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date: Thursday, October 15, 2026 6:02:10 PM

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Report Suspicious

To whom it may concern, I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I have further outlined my concerns about the project and the DEIR below. Where the DEIR falls short: Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. Incomplete Environmental Baseline and Project Description – • The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. • The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. • The existing baseline conditions should not include portable diesel lights that the District has only recently started using. Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. Thank you for your consideration, [name]

I110-1
I110-2
I110-3
I110-4
I110-5
I110-6
I110-7
I110-8
I110-9
I110-10
I110-11
I110-12
I110-13
I110-14

Letter I111

From:	flweiland
To:	Rio Americano; nicholas.arps@sanjuan.edu; Sorgen. KC; Save the American River Association
Subject:	DEIR comments re: Rio Americano High School Stadium Improvement Project
Date:	Saturday, October 17, 2026 1:32:59 AM

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Dear Mr. Arps,

Throughout the DEIR document the Preparer consistently relies on the boundary of the American River Parkway to analyze potential impacts to the Parkway from the Rio Americano sports/events stadium project. The DEIR states "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." (DEIR, 3.1.3) On more than one occasion it states that the levee separates the campus, including the existing Raider Stadium from the American River Parkway. (DEIR, 3.1.1, 4.1-1,6, Photo viewpoint KOP-6, 4.1-7,8, 4.1-11, 4.1-17,18,19,20,25, 4.2-1,2,13,15, 4.2-20, 7-15, and so on)
The DEIR should explain why it believes the project site is separated from the American River Parkway by the American River levee. It is my understanding that the levee is a Sacramento County owned parcel and is within the American River Parkway and subject to the American River Parkway Plan policies governing the Limited Recreation Land Use designation.
The DEIR potentially compounds the error by mischaracterizing the Rio Americano subarea of the American River Parkway. The document states that "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)..." (DEIR, 4.1-18)
The DEIR should explain why it believes the Rio Americano subarea only consists of open space and the Jedediah Smith mixed-use trail and not the levee.
If the surrounding Land Uses, Environmental Settings, and Zoning are not correctly characterized, thereby failing to comply with CEQA, then the lead agency, the regulatory authorities, and most importantly, the public, are not able to correctly identify and comment on potentially significant environmental impacts.
Please confirm the receipt of the above comments for inclusion in the DEIR.
Sincerely,
Betsy Weiland
4950 Keane Drive
Carmichael, CA 95608

I111-1

Letter I112

From:	Tony Whetstone
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Wednesday, October 14, 2026 4:17:27 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety. I112-1 I112-2 I112-3

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium. I112-4

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I112-5

I have further outlined my concerns about the project and the DEIR below. I112-6

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance. I112-7

Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I112-8

Incomplete Environmental Baseline and Project Description – I112-9

- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
- The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008. I112-10 I112-11
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I112-12

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use. I112-13

Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I112-14

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I112-15

Thank you for your consideration,

Tony Whetstone

Letter I114

From:	Mary Wilson
To:	Rio Americano
Subject:	Rio Americano High School Stadium Improvements Project
Date:	Thursday, October 15, 2026 2:07:48 PM
Attachments:	DEIR Comment Letter MWilson.pdf

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Attached is my comment letter.
Mary Wilson

I114-1

RE: Public Comments on Draft Environmental Impact Report
Rio Americano High School Stadium Improvements Project
SCH No. 2026010094

Dear San Juan Unified School District and AECOM:

I am submitting these comments on the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Improvements Project.

My principal concerns involve the project's immediate adjacency to the American River (a nationally and State designated Wild and Scenic River) and the American River Parkway, and the potential effects of permanent stadium lighting, increased nighttime activity, amplified sound, and the substantially expanded stadium capacity on the Parkway, wildlife habitat, and the surrounding environment.

I have reviewed the DEIR materials and, in particular, the project's **MUSCO Lighting Report (Appendix B), Bat Survey Memo (Appendix C), and Noise Data (Appendix D)**. Those technical documents raise several questions that I believe should be addressed more completely in the Final EIR.

I114-2

1. The project represents a substantial increase in nighttime activity

The project proposes four permanent 80-foot-high stadium light standards, six additional approximately 15-foot pedestrian light poles, expanded bleacher seating for approximately 2,575 people, a new press box, and an upgraded PA system. Important issues with potential effects on the project area and adjacent river include biological resources, noise, vegetation, and wetland/riparian resources, among others.

The project's Bat Survey Memo states that, although the stadium currently uses portable diesel-powered lights, the installation of permanent lights is expected to **increase the level of activity after sunset**. (Appendix C, p. 1.)

Although nighttime activity already occurs, the proposed project is intended to facilitate accommodating more nighttime activity in the area of the project. It would materially change the intensity, duration, frequency, lighting characteristics, noise, and human activity associated with that nighttime use. The Final EIR should clearly quantify this change with respect to each of these issues, rather than treating the proposed project as essentially equivalent and comparable to existing nighttime activity.

I114-3

2. The Bat Survey itself identifies potentially significant effects from changes in lighting and noise

The Bat Survey Memo states that operational changes resulting from the project, including changes in lighting and increased noise from evening sports and other activities, could cause permanent and potentially significant impacts if they cause roost abandonment during the maternity season or winter months. (Appendix C, p. 2.)

The memo further states that artificial lighting can have different effects on bats: it can attract some insect prey, however it discourages bats that avoid illuminated areas because the light increases their

I114-4

visibility to predators. The memo also states that the early evening hours are prime foraging hours for most bat species; Early evening hours are precisely the time when project proponents wish to increase the intensity, duration, frequency, lighting characteristics, noise, and human activity in the area. (Appendix C, p. 2.)

I114-4 (Cont.)

Ultimately, the memo concludes that changes in lighting and increased nighttime noise could result in a permanent loss of foraging habitat in the vicinity of the stadium. It notes that some species, including pallid bats, require foraging habitat very near their roosting habitat. In this case, their roosting habit is immediately adjacent to the project (Appendix C, p. 2.)

Given these factors, the Final EIR should explain in greater detail how it reached its conclusion that biological impacts are less than significant.

3. The analysis relies heavily on a row of trees as a buffer

I114-5

The Bat Survey found that several trees along the American River Parkway contain cavities and sloughing bark that provide potential roosting habitat for small numbers of bats. The survey concluded that these potential roost features were adequately screened from the proposed lighting and noise by the row of large trees, mostly eucalyptus, along the southern fenceline between the school and the Parkway. (Appendix C, p. 3.)

The memo specifically says that this tree row provides the screening necessary to conclude that disturbance in the Parkway would not be expected to cause roost abandonment. (Appendix C, p. 3.) If the trees are essential to provide the assumedly sufficient light and noise screening in order to avoid a significant impact, the Final EIR should clearly state:

- Exactly which trees constitute this screening buffer;
- Whether any will be removed or substantially pruned;
- Whether all of those trees will be preserved;
- Whether the District will maintain the screening vegetation for the life of the project;
- What mitigation will apply if a tree dies, is removed, or becomes hazardous;
- Whether replacement trees will be required; and
- How long replacement vegetation would take to provide equivalent screening.

If preservation of this tree row is necessary for the biological conclusions, that preservation should be an enforceable project requirement or mitigation measure—not merely an existing condition assumed by the analysis.

4. The survey documented actual bat use of the stadium area

I114-6

The Bat Survey did not find an active bat roost in the surveyed stadium tree line. However, it did find actual bat activity. Five bats were observed foraging above the existing stadium and adjacent grasslands. Acoustic recordings identified likely Yuma myotis and canyon bat, and Mexican free-tailed bats were also detected. The survey also recorded approximately eight minutes of continuous Mexican free-tailed bat detections after the first bat was detected. The survey therefore confirms that the existing stadium and adjacent ruderal habitat are bat foraging habitat. (Appendix C, p. 4.)

The consultant nevertheless concluded that the loss would be less than significant because temporary mobile lighting already occurs, only minor foraging activity was detected, and the Parkway provides abundant and generally superior foraging habitat. (Appendix C, p. 4.)

I request that the Final EIR provide a more quantitative explanation of the phrase "minimal increases in disturbance," and specifically address the additional levels of light, noise, and human activity that would increase over and above existing conditions.

I114-6 (Cont.)

Specifically, the Final EIR should identify the assumptions used to determine the following:

- How many additional evenings of stadium use are expected;
- How much longer lighting will remain on;
- How much brighter the permanent lighting will be relative to existing mobile lighting;
- How much additional PA/crowd noise is anticipated; and
- How the resulting change in nighttime conditions was evaluated for bats using the stadium and the adjacent Parkway.

5. The proposed lighting system is substantial

I114-7

The MUSCO Lighting Report documents a four-pole, 80-foot-high system with **64 fixtures** and a total listed load of approximately **59.60 kW**. The football lighting system alone includes 52 fixtures and approximately 49.68 kW of load. (Appendix B, p. 3.)

The lighting calculations predict an average maintained illumination of approximately 51.4 foot-candles on the football field, with a maximum of 67 foot-candles. The MUSCO report also contains specific calculations for light spill outside the playing areas. (Appendix B, p. 3-4.)

Given the project's immediate proximity to the Parkway, the Final EIR should clearly identify the predicted illumination at:

- the southern project boundary;
- the row of trees along the southern fence;
- the American River Parkway;
- the Jedediah Smith Memorial Trail; and
- other publicly accessible Parkway locations.

The District's own project webpage includes nighttime renderings specifically labeled "Jedediah Smith Trail Location," "Jedediah Smith Trail Location – No Trees," and "Jedediah Smith Memorial Trail – Realistic (Dusk)." The existence of a "No Trees" nighttime rendering is particularly important because the biological analysis relies on trees to screen the Parkway. The Final EIR should explain the assumptions behind the tree-screening analysis and provide quantitative lighting information both with and without that screening.

6. The noise analysis warrants particular attention

I114-8

The DEIR identifies significant and unavoidable impacts from construction noise, operational noise, and cumulative noise, even after application of mitigation measures. The Noise Data Appendix documents substantial existing noise levels at monitoring locations. For example, one monitoring period recorded evening hourly Leq values reaching 84.1 dBA at LT-02, with a maximum of 99.5 dBA during the recorded period. (Appendix D, p. 5.)

I understand that these measurements are monitoring-site data, and should not be interpreted as predicted noise levels at the Parkway or nearby residences. However, they demonstrate the

importance of clearly identifying the sources and assumptions underlying the operational-noise model.

The Final EIR should clearly state:

- the number of nighttime stadium events assumed each year;
- the number of events involving amplified sound;
- the assumed event start and end times;
- the assumed spectator capacity;
- the expected use of the PA system;
- whether music is included, and at what decibel levels;
- whether special events are included;
- the expected duration of crowd noise; and
- the predicted noise levels at the nearest residences and at the American River Parkway.

I114-8 (Cont.)

7. The noise analysis and biological analysis should be reconciled

I114-9

There is an important relationship between the two technical studies. The Bat Survey states that increased nighttime noise associated with sports and other activities could cause **potentially significant impacts** under certain circumstances and could result in loss of nighttime foraging habitat. (Appendix C, p. 2.)

At the same time, the DEIR identifies operational noise as a **significant and unavoidable** impact.

The Final EIR should explicitly explain why the increase in nighttime noise that is significant for human receptors does not create a potentially significant effect on wildlife using the immediately adjacent Parkway. I am not suggesting that the same significance thresholds necessarily apply to humans and wildlife. However, the Final EIR should explain the factual basis for concluding that the increased nighttime noise and activity will not substantially alter wildlife use of the Parkway.

8. The Parkway itself should be treated as a sensitive receptor

I114-10

The American River is a federally designated Wild and Scenic River. It is immediately adjacent to the proposed project. The DEIR identifies biological resources, vegetation, hydrology/water quality, noise, and wetland/riparian resources among the environmental issues of concern.

The Final EIR should therefore clearly discuss the Parkway, not merely the school property, as a potentially sensitive environmental receptor for:

- artificial light;
- noise;
- wildlife habitat;
- wildlife movement;
- riparian resources;
- vegetation; and
- cumulative effects.

The biological analysis should explain whether the relevant geographic area for evaluating impacts is limited to the stadium parcel or includes the immediately adjacent Parkway habitat that may be affected by changes in lighting and noise.

9. Alternatives that reduce Parkway impacts should be evaluated

I114-10

The Final EIR should identify and evaluate feasible alternatives that would accomplish the District's stadium objectives while reducing nighttime effects on the adjacent Parkway.

Examples include:

- lower-intensity lighting;
- additional shielding and more precise fixture aiming;
- reduced operating hours;
- limitations on nighttime events;
- restrictions on amplified sound;
- preservation of a wider vegetative buffer;
- relocating light standards farther from the Parkway; and
- alternative stadium configurations that reduce nighttime light and noise exposure.

Conclusion

I114-11

The DEIR contains useful technical studies, but those studies also demonstrate why the project's proximity to the American River Parkway deserves especially careful consideration.

The Bat Survey acknowledges that the project will increase activity after sunset and that changes in lighting and nighttime noise can affect bat foraging habitat and, under some circumstances, roosting. It identifies potential bat roost habitat in trees within the Parkway and relies on the existing southern tree line as a buffer against the project's lighting and noise. (Appendix C, pp. 2–4.)

The MUSCO report documents a substantial permanent lighting system, including four 80-foot structures and 64 fixtures. (Appendix B, p. 3.)

The District's environmental documents identify operational noise as a significant and unavoidable impact.

For these reasons, I ask that the Final EIR provide a more detailed and quantitative analysis of the project's effects on the American River Parkway, particularly with respect to permanent nighttime lighting, nighttime noise, wildlife use of the area, and the continued existence of the tree buffer on which portions of the biological analysis rely.

Please include these comments in the administrative record and provide substantive responses to each issue in the Final EIR.

Thank you for your consideration.

Sincerely,

Mary Wilson

Mary Wilson
wilmcmw@aol.com

Letter I115

From:	Donald Young
To:	Rio Americano; mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public Comment for Rio Americano Stadium Project
Date:	Friday, October 16, 2026 7:58:18 PM

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Report Suspicious

Below is my public comment submission for Draft EIR of the Rio Americano High School Stadium Project. Please add it to the official record.

To whom it may concern,

I am a longtime resident of Sacramento and I live directly across the American River from Rio Americano High School. I love living in my modest neighborhood near the American River Parkway (Parkway). I spend time by the river daily and see the rich diversity of bird and animal species that rely on the Parkway's riverine and riparian habitat. I115-1

California has lost 95% of it's historic riparian habitat, so the Parkway is an important resource for the species that rely on that habitat. The Parkway includes the only federally and state-designated Wild & Scenic River that flows through a major metropolitan area in the United States. It is a national, state and local treasure and a vital artery for our community's health, recreation and natural beauty - a truly special place that people have worked together for decades to establish, protect and preserve for future generations. I115-2

I am concerned about the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I115-3 I am concerned about the quality of life for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. I115-4

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano High School is not suitable for a high intensity sports and events stadium. I115-5 The campus would be an excellent location for a state of the art science program with the Parkway as the educational opportunity of a lifetime. I115-6

Below are listed my specific concerns about the project and the DEIR. I115-7

Biological resources – Biological resources such as bats, nesting birds, northwestern pond turtles, and elderberry longhorn beetles are addressed

largely through construction-phase measures, with cursory analysis on impacts from the unspecified numbers of nighttime sports and events on the diversity of and heavy use by wildlife in this area of the River and Parkway. I115-7 (Cont.)

Event Noise – Noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. I115-8

Please advise how this intended project complies with the Sacramento County Noise Ordinance. I115-9

Lighting – The DEIR/FEIR should meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design. I115-10

Incomplete Environmental Baseline and Project Description – I115-11

- An accurate project description is essential because it defines the impacts that must be analyzed and the mitigation measures that could eliminate or reduce them. The DEIR should identify the Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and public-address specifications as project components that will, conceivably, constrain sports and events, both regular and those that are larger and later. The District's project must comply with the Urban American River Parkway Preservation Act. I115-12
- The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions. I115-13
- The existing baseline conditions should not include portable diesel lights that the District has only recently started using. I115-14

Cumulative impacts – The separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations. I115-15

Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient. I115-16

Thank you for your consideration,

Donald Young

9231 Defiance Circle, Sacramento, CA 95827

Individual Letter 116

From: Kella Cohen
To: Rio Americano
Subject: Public Comment on the Draft Environmental Impact Report (DEIR)
Date: Saturday, October 17, 2026 3:02:24 AM

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Date: October 16, 2026

To:
Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
Email: RioEIRcomments@aecom.com

RE: Public Comment on the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Improvements Project (SCH #2026010094)

Dear Mr. Arps and Members of the Board of Education,

As a nearby homeowner living across the river diagonal to the proposed project site, I am writing to formally submit comments on the Draft Environmental Impact Report (DEIR) for the Rio Americano High School Stadium Improvements Project. The proposed project, which expands stadium capacity by approximately 800% (from 288 to 2,575 seats) and introduces four permanent 80-foot high-mast LED light standards, an elevated press box, and an enhanced public address (PA) system, poses severe, unmitigated environmental impacts on the adjacent American River Parkway ecosystem, human quality of life, and regional policy frameworks. I16-1

The DEIR fails to adequately evaluate or mitigate the following critical areas: I16-2

1. Prematurely-Rejected Alternative:

6.3.3. Use Alternate Existing Stadiums

I strongly oppose the Project's preferred Alternative 2 to build a new stadium with increased capacity. I request a complete analysis of this prematurely-rejected alternative: **6.3.3. Use alternate existing stadiums.**

Choosing this alternative completely eliminates the entire suite of severe, permanent environmental degradation introduced by building a massive new venue at this location. Under the California Environmental Quality Act (CEQA), the primary purpose of an alternatives analysis is to find feasible ways to *avoid* or substantially lessen a project's significant environmental effects (CEQA Guidelines § 15126.6). Furthermore, under the Clean Water Act and parallel environmental frameworks, the Lead Agency is guided to select the **Least Environmentally Damaging Practicable Alternative (LEDPA)**. The use of an existing, already-built stadium is unambiguously the LEDPA.

The DEIR's rationale for prematurely discarding the off-site existing stadium alternative rests on a glaring **false equivalence regarding carbon emissions**. The DEIR claims that transporting students to an alternate stadium would increase mobile greenhouse gas (GHG) emissions. This is an asymmetrical and legally flawed comparison for several reasons:

I16-2
(cont.)

- **Temporary vs. Permanent Impacts:** The mobile emissions from localized athletic transport are minor, intermittent, and temporary. Conversely, the preferred alternative introduces permanent, irreversible, structural environmental impacts—including irreversible degradation of a Wild and Scenic River viewshed, long-term disruption of riparian ecosystems, and permanent destruction of residential quiet enjoyment.
- **Avoidance of Embodied Carbon:** The DEIR fails to calculate the massive influx of greenhouse gases and

carbon expenditures required to *construct* an 800%-capacity stadium expansion (manufacturing and transporting concrete, steel, 80-foot high-mast standards, synthetic turf, and asphalt). Utilizing existing regional infrastructure avoids these significant construction-phase carbon expenditures entirely.

- **Operational Energy Consumption:** A new stadium introduces decades of localized energy consumption via high-intensity stadium lighting and commercial-scale PA amplification. Shifting events to an existing facility optimizes regional resources without compounding the localized energy grid footprint next to a protected parkway.

I16-2 (cont.)

By prioritizing minor, easily mitigated mobile transit emissions over the absolute protection of a federally designated Wild and Scenic River corridor and an established residential neighborhood, the DEIR turns the core purpose of CEQA on its head. The Final EIR must fully re-evaluate and restore the Off-Site Existing Stadium Use Alternative.

2. Failure to Conform with the American River Parkway Plan (2008) & The Combining Zone

The project is near to the bank of the lower American River behind a flood control levee. This boundary interfaces intimately with the protected Parkway Corridor.

I16-3

- **The Combining Zone Violations:** The property is zoned **RD-4/PC (Low Density Single-Family Residential/Parkway Corridor)**. The "PC" Combining Zone requires that any development adjacent to the parkway strictly minimize visual, light, and acoustic intrusions to protect the scenic and natural character of the parkway corridor. Converting a low-impact high school athletic track into a high-intensity sports venue

directly violates the intent of the Parkway Corridor Combining Zone. The DEIR must explain how a 2,575-seat stadium complies with the restrictive development standards of the PC Combining Zone.

- **American River Parkway Plan (2008) Non-Compliance:** The Parkway Plan mandates the preservation of the lower American River's natural resources and quiet recreation. The introduction of structural massing (an elevated press box) and intense nighttime illumination directly compromises the wild and scenic viewshed protected under this plan. The DEIR must provide a comprehensive consistency analysis proving compliance with the policy objectives of the 2008 Parkway Plan.

I16-3 (cont.)

3. Violations of the Wild and Scenic Rivers Act (State & Federal)

The lower American River is a designated component of both the **Federal and California Wild and Scenic Rivers Acts**, recognized for its "extraordinary scenic, recreational, fishery, and wildlife values".

I116-4

- The DEIR fails to address how the introduction of high-intensity artificial light at night (ALAN) and high-decibel amplified noise directly impacts the migratory and foraging behaviors of protected species utilizing this wild and scenic river corridor.
- Under the Act, any project immediately adjacent to the designated boundaries must not degrade the distinct values for which the river was protected. Flooding the river canyon with structural light glare and crowd noise constitutes a direct degradation of these protected scenic and ecological resources.

4. Inadequate Assessment of Light Pollution, Spill, and Glare

While the project claims to utilize modern, directional LED fixtures, the physical reality of light dynamics at this elevated riverbank location has been ignored:

- **Reflective Glare and Skyglow:** The DEIR fails to calculate the light reflecting off the field turf, track, and bleachers into the atmosphere. This upward scattering will interact with river moisture and dust, generating an intense localized "skyglow" dome that will cast artificial light directly into the riparian canopy.
- **Photometric Methodology Flaws:** The DEIR's photometric modeling must be re-evaluated. Did the district measure foot-candles horizontally across the entire width of the river? Did the model account for light penetration into the tree canopies where crepuscular and nocturnal birds roost?
- **Spectral Disruption:** The DEIR must disclose the precise color temperature of the proposed LEDs. High-correlated color temperature (cool white/blue light) scatters severely and disrupts the circadian rhythms of wildlife.

I116-5

5. Significant, Unmitigated Noise Impacts on Human Quality of Life

The DEIR fundamentally downplays the impact of noise on neighboring residential zones across the river:

- **Acoustic Amplification Over Water:** As a noise-sensitive resident living diagonal to the venue, I already hear existing activities loud and clear. Sound waves travel over open air and reflect efficiently off flat water surfaces, amplifying the noise before it strikes residential

I116-6

property lines.

- **Destruction of Outdoor Yard Enjoyment:** An 800% capacity increase creates a massive new baseline of crowd noise (cheering, stomping on metal bleachers). This noise, compounded by frequent athletic practices and games featuring the enhanced PA system, will completely destroy my ability to enjoy my outdoor yard and property. The project forces residents to retreat indoors with windows tightly sealed just to escape the acoustic intrusion. This is a severe impact on the baseline quality of life that the DEIR treats as insignificant.

I116-6 (cont)

- **PA System Design:** The DEIR must disclose if the "upgraded" PA system utilizes a point-source design blasting from the press box across the river, or a localized, downward-angled distributed audio setup.

I116-7

6. Detailed Disruptions to Crepuscular, Nocturnal, and Diurnal Wildlife Daily Life Activities

The DEIR fails to analyze how the introduction of high-intensity Artificial Light at Night (ALAN) and high-decibel acoustic pollution disrupts the specific, fundamental mechanics of daily wildlife survival within the adjacent riparian ecosystem. The project will severely impact wildlife across three distinct operational cycles:

- **Disruption of Foraging, Prey Detection, and Hunting Success:** Low-light hunters—such as the **Great Horned Owl, Western Screech Owl, and various bat species** utilizing the river corridor—rely on highly sensitive visual adaptations like the *tapetum lucidum* and high rod-density retinas to navigate. Stadium lighting causes immediate **photoflash blindness** and temporary retinal adaptation delay. This leaves these predators visually incapacitated and unable to hunt long after the

I116-8

stadium lights are turned off. Furthermore, owls depend on absolute silence and specialized acoustic feathers to detect the rustling of small rodents in the brush. The high-decibel drone of the stadium PA system and crowd noise **masks the acoustic signatures of prey**, completely destroying the hunting efficiency of these birds of prey during peak evening foraging hours. Conversely, small nocturnal mammals experience **lucifugous (light-fleeing) behavior** under stadium skyglow, remaining hidden in deep cover and restricting their own daily foraging ranges, which leads to localized starvation.

I116-8 (cont.)

- **Interruption of Avian Roosting, Migration, and Diurnal Sleep Cycles:**Diurnal species (animals active during the day, such as **Great Blue Herons, Egrets, and local songbirds**) that roost in the tree canopies directly across the river will have their sleep cycles shattered by the stadium's lateral light spill and stadium noise. High-intensity lighting suppresses **melatonin production**, causing chronic sleep deprivation, elevated stress hormones (corticosterone), and weakened immune systems. Furthermore, the lower American River is a critical navigation highway for migratory birds traveling at night along the **Pacific Flyway**. Bright stadium lights cause a **phototactic attraction ("vacuum effect")**, pulling migrating birds off their flight paths. These birds become disoriented, circle the light dome until exhausted, or suffer fatal collisions with the new 80-foot light standards and elevated press box structures.
- **Interference with Acoustic Communication and Reproductive Success:** Crepuscular and nocturnal amphibians (such as the **Pacific Treefrog**) and nesting birds rely on vocalizations at dusk and night to defend territories and attract mates. The amplified audio from the stadium floods the environment, forcing animals to either

alter their call frequencies (which reduces mating success) or stop calling entirely. This disrupts the reproductive baseline necessary to sustain local populations along the Parkway.

I116-8 (cont.)

Requested Mitigation Measures

To achieve compliance with CEQA and minimize these severe impacts, I request that the final EIR mandate the following legally binding mitigation measures:

1. **Strict Operational Curfews:** Implement a hard shut-off time of 9:30 PM for all stadium lights and the PA system, with zero exceptions for overtime games.
2. **Annual Event Frequency Caps:** Limit the use of high-intensity lights and amplified PA systems to a maximum of 10–12 major events per academic year.

I116-9

3. **Prohibition of Amplified Sound During Practice:** Ban the use of the PA system for daily athletic practices; its use must be strictly limited to main games.
4. **Distributed Sound System Architecture:** Require a downward-directed, low-voltage distributed speaker system across the bleachers rather than a centralized loudspeaker array.

I116-10

5. **Lighting Specifications:** Require a **U0 BUG rating** (zero direct uplight) and a warm color temperature **not to exceed 2700K–3000K** (or amber) to protect dark skies and wildlife.

I116-11

6. **Rejection of Vegetation as Acoustic Mitigation & Demand for Structural Barriers:** The Final EIR must not rely on vegetative plantings or "tree buffers" as a mitigation measure for noise. Per established Caltrans and FHWA acoustic standards, vegetation lacks the mass required to attenuate decibel levels. While native tree canopies must be planted to provide vital **visual screening and horizontal**

I116-12

light-spill interception, they are physically incapable of mitigating acoustic pollution. To mitigate the severe noise impacts on the river corridor and across-river residents, the District must instead install **certified structural acoustic dampening panels** around the PA speaker arrays and design a strict **engineered sound wall** along the stadium's river-facing perimeter, or select the off-site stadium alternative.

I116-12 (cont.)

I look forward to the District's detailed, legally sufficient responses to each of these.

I116-13

Thank you.

Sincerely,

Kelly Cohen

9495 Mira del Rio Dr, Sacramento

COMMENTS RECEIVED AFTER THE CLOSE OF THE PUBLIC REVIEW PERIOD

From:	Harsch, Fritz H
To:	Rio Americano
Cc:	mbassanelli@sanjuan.edu; nicholas.arps@sanjuan.edu
Subject:	Public comment submission for Draft EIR of the Rio Americano High School Stadium Project
Date:	Tuesday, October 20, 2026 2:06:52 PM

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Report Suspicious

To whom it may concern,

I would like to express my concerns regarding the intended stadium construction at Rio Americano High School, which includes an almost 800% increase in bleacher capacity, a substantial increase in noise pollution, light pollution, traffic issues, and potential safety issues. I am concerned about the quality of living for the community and the impacts the project will have on wildlife that rely on a dark and quiet American River Parkway. This proposal's lack of an improved evacuation plan and security of any type leaves students, parents, staff and attendees at serious risk to their safety.

Although I understand the District's desire for a stadium at every high school, the proposed site at Rio Americano HS, along the state protected American River Parkway, is not suitable for a high intensity sports and events stadium.

Note the District, within the last ten years, added a track field at the stadium's proposed location. The campus is an excellent opportunity for a state of the art science program with the Parkway as the educational opportunity of a lifetime.

I have further outlined my concerns about the project and the DEIR below.

Where the DEIR falls short:

Event Noise – noise pollution was identified as significant and unavoidable even after mitigation. Therefore, another alternative should be presented. Please advise how this intended project complies with the Sacramento County Noise Ordinance.
Lighting – Meaningfully evaluate glare, skyglow, spectrum, and nighttime activities adjacent to the Parkway and river corridor. The FEIR must require lighting that complies with the maximum light reduction available through DarkSky orientated design.
Incomplete Environmental Baseline and Project Description –

• The DEIR/FEIR must specify the maximum and accurate operating conditions for stadium use rather than generalized "typical" operating conditions.
• The DEIR/FEIR must commit to reasonable Night Event Management Standards, facility-use rules, staffing commitments, security arrangements, parking controls, and PA limitations consistent with residential use, the Parkway Corridor Combining Zone (PCCZ), and the American River Parkway Plan 2008.
• The existing baseline conditions should not include portable diesel lights that the District has only recently started using.

Biological resources – The DEIR/FEIR must analyze ongoing event operations along the Parkway and how it impacts all wildlife, habitat, and recreational use.
Cumulative impacts – the separately improperly approved 90-foot cell tower must be analyzed together with stadium construction and operations.
Parking and Traffic – The DEIR/FEIR must provide parking and a transportation model for the anticipated 3,500+ people who are expected to use this stadium/event center. Suggested, unsecured, offsite parking is insufficient.

Thank you for your consideration,

Fritz Harsch

From: William C Pevec
To: boardmembers@sanjuan.edu; Melissa Bassanelli
Cc: Construction; Rio Americano
Subject: Rio Americano Stadium Project-Request to Postpone Board Action on November 17
Date: Sunday, November 1, 2026 9:29:45 PM
Attachments: Dear Ms. Creason.docx

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Report Suspicious

Dear Ms. Creason, Superintendent Bassanelli, and Board Members,

I am your constituent, a resident of San Juan Unified School (SJUSD) District Area 3. I am writing to voice multiple concerns regarding the proposed stadium expansion at Rio Americano High School, and request that a decision on this project be postponed beyond November 17, 2026, to allow multiple environmental, community, and procedural concerns to be addressed.

The proposed stadium is directly adjacent to the American River Parkway. The Parkway is an irreplaceable, unique regional asset. The Lower American River is both a federal and state designated wild and scenic river. This beautiful park provides refugia for numerous animal and plant species, providing an intact corridor from the foothills to the valley. The impact of a large stadium complex on these species is inadequately addressed in the draft environmental impact report (EIR). Once damage is done to this fragile habitat, it cannot be undone. The environmental impact of this project requires more careful consideration.

Having two large sports stadiums less than a mile apart along American River Drive will result in major traffic congestion and parking problems for the local community, with impacts on safety and emergency access. These impacts are not adequately addressed in the draft EIR, and are not remediable.

Communication by the SJUSD with the community has been limited. An opportunity for community input on any revisions made to the final EIR, based on submitted comments, should be provided before any decision is made.

I use the Parkway almost daily, as do many residents of the region. The Parkway is clearly the most valuable regional asset in terms of quality of life. I am also an environmentalist, and I worry about the cumulative effects of additional development along this wildlife corridor.

The American River Parkway provides its neighbor, Rio Americano High School, with a

precious, irreplaceable living laboratory for the education of its students. Careful consideration is necessary before any development is approved that could negatively affect this asset.

For these reasons, I ask the Board to postpone its decision until 2027 to allow sufficient time for a thorough review of the environmental concerns, meaningful consultation with the County (which is responsible for management of the American River Parkway) and other responsible agencies, and consideration of alternatives that better serve the students and the community.

Please confirm receipt of this letter by email and include it in the administrative record for the Rio Americano stadium project.

Sincerely,

William C. Pevec

831 Laverstock Way
Sacramento, California 95864
wcpevec@ucdavis.edu

William C. Pevec, MD
Professor Emeritus
University of California, Davis
School of Medicine
916-616-9530
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ATTACHMENT B

DarkSky International Lighting Performance Summary

DarkSky International
5049 E. Broadway Blvd. Ste. 105
Tucson, AZ 85711
tel +1-520-293-3198
www.darksky.org

To: Project Team

October 22nd, 2026

Congratulations!

The lighting design for the Rio Americano High School Football Stadium, Sacramento, CA, has been reviewed and found to comply with the DarkSky Outdoor Sports Lighting Program criteria. This letter confirms your successful application of compliant design plans and makes your project eligible for inspection and possible certification.

We are proud to have you join the community of outdoor sports lighting facilities working to reduce light pollution and improve the environment. By adopting the DarkSky criteria for Outdoor Sports Lighting, your project will:

- Minimize neighborhood lighting nuisance by greatly reducing local spill light and glare
- Manage high angle light pollution, thus dramatically decreasing offsite light trespass and sky glow
- Mitigate neighborhood light pollution and sky glow, which will benefit the environment, the astronomy community, and others impacted by poorly designed outdoor sports facilities
- Minimize light output, thereby reducing energy consumption

Sincerely,

James Brigagliano LC, MIES, LEED Green Assoc.

Lighting Program Manager

James.brigagliano@darksky.org

BOARD OF DIRECTORS

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DarkSky

DarkSky Approved Outdoor Sports Lighting Program

Lighting Performance Summary

Project: Rio Americano High School Stadium
Location: Sacramento,CA
Submitted: 22 October 26 - 2:53 PM EDT

Multiple Playing Areas

Applicable Lighting Standard

	Standard	Measured	Result
Meets IES or HS Standard	—	Yes	PASS

Applied BUG Analysis

	Standard	Measured	Result
Total Fixture Lumens	—	6,059,016 lumens	—
Backlight: Lumens	15% or less	11.19%	PASS
Backlight: Spill	2.0 lux or less	0.17 lux	PASS
Uplight: Lumens	8% or less	7.4%	PASS
Glare: Max Candela	1000 candela or less	853 candela	PASS
Glare: 80° - 90°	250 lumens	0 lumens	PASS

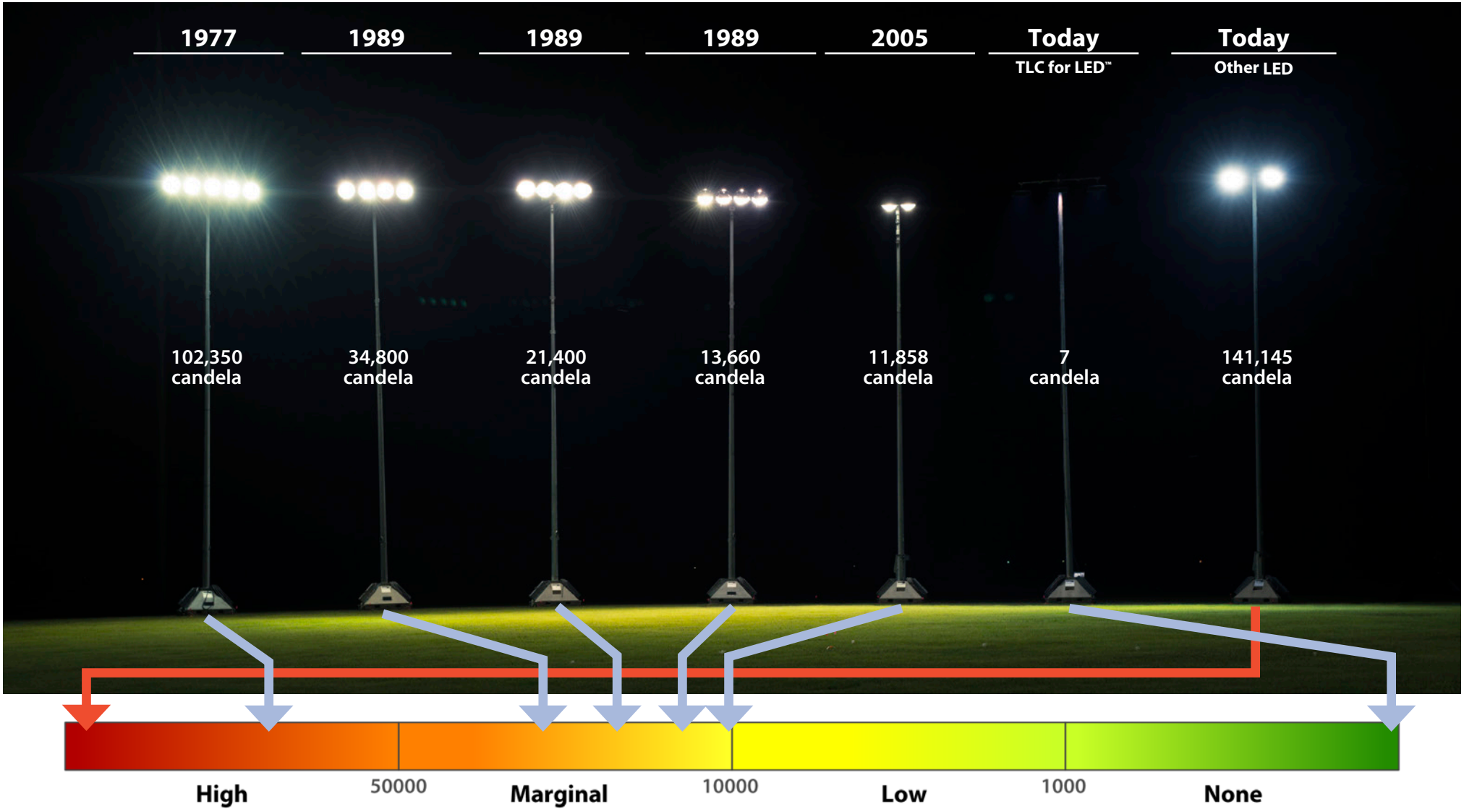
Lighting Performance Result

PASS

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ATTACHMENT C

Candela Scale



Candela values (single fixture) reported from photometric reports at 15˚ above the beam center.

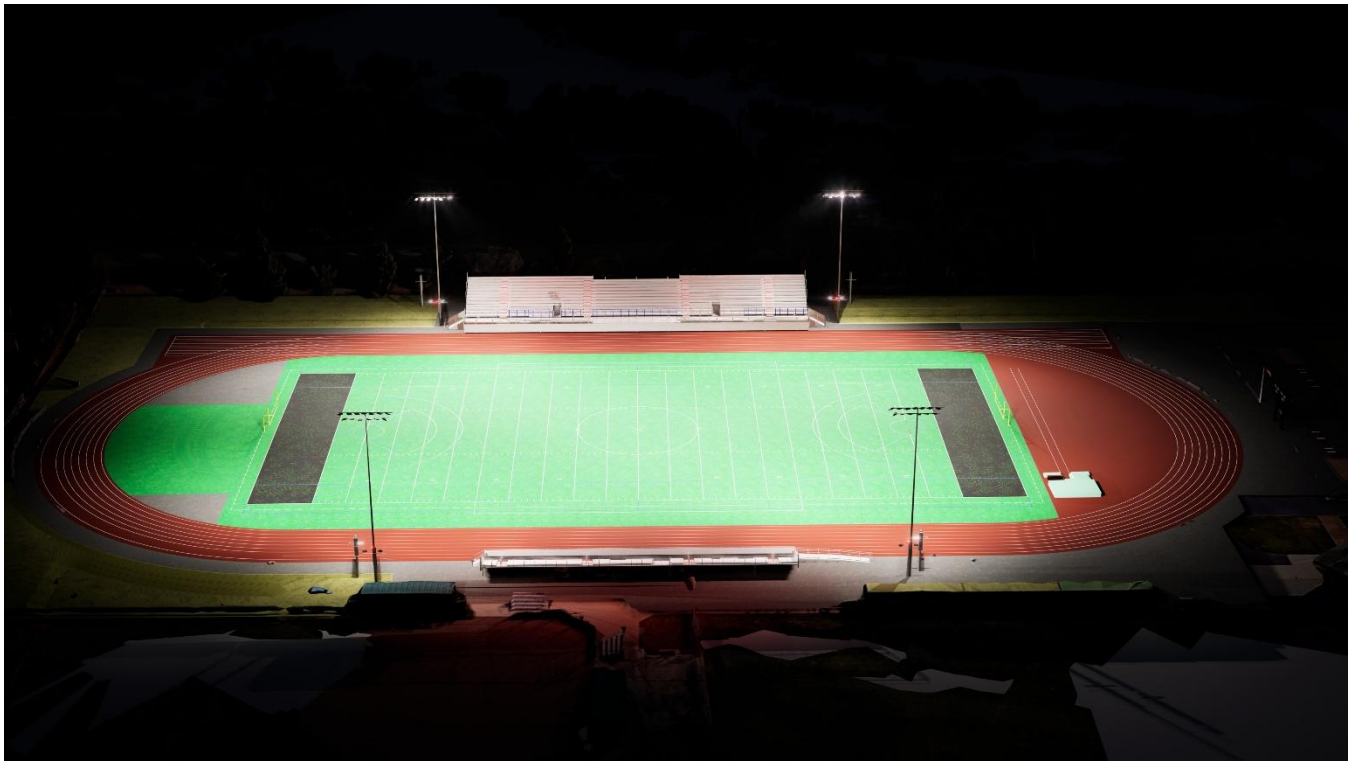
Photographed at 100 ft (30 m) from field edge. Used equal parameters for: on-field light level per pole, mounting height, luminaire aiming angles, and pole distance from aiming point.

©2015, 2021 Musco Sports Lighting, LLC · M-2289-en04-2

Rio Americano High School Stadium Improvements Project
Draft Environmental Impact Report

SCH Number: 2026010094

Attachment D
Noise Data



November 2026

LT-01-Ldn

Long-Term 24 Hour Continuous Noise Monitoring

Model Input Sheet

Project: 60747601 - Rio Americano High School EIR

Date: **17Sep** **18Sep**

Site: LT-01

Hour	Leq	Lmax	L50	L90
14:00	44.2	57.1	42.1	39.9
15:00	44.8	57.3	43.4	41.5
16:00	47.3	70.5	44.2	42.3
17:00	48.8	66.2	45.4	42.1
18:00	52.2	73.4	48.5	44.9
19:00	47.4	66.7	45.3	43.6
20:00	48.0	59.4	46.8	44.9
21:00	46.0	56.9	45.5	44.3
22:00	44.7	55.4	44.5	43.4
23:00	45.2	56.6	44.7	42.5
0:00	42.0	56.0	41.5	40.5
1:00	41.6	48.8	41.3	40.3
2:00	40.2	49.7	39.9	38.8
3:00	41.1	47.6	40.7	39.0
4:00	40.9	51.9	40.4	39.2
5:00	46.0	60.2	45.4	44.3
6:00	50.4	65.9	49.1	47.4
7:00	49.1	56.4	48.9	47.2
8:00	46.7	62.1	45.1	43.7
9:00	46.6	68.7	42.6	40.7
10:00	50.6	69.5	42.9	41.4
11:00	47.6	67.3	43.3	41.3
12:00	53.6	71.3	46.9	43.4
13:00	60.0	76.2	50.2	43.6

Averages

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	51.4	65.3	45.4	43.0
Nighttime (10 p.m. - 7 a.m.)	44.9	54.7	43.1	41.7

Uppermost-Level

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	60.0	76.2	50.2	47.2
Nighttime (10 p.m. - 7 a.m.)	50.4	65.9	49.1	47.4

Percentage of Energy

Daytime	88%
Nighttime	12%

Calculated L_{dn}, dBA

53.1

LT-01-Ldn (R)

Long-Term Six-Hour Continuous Noise Monitoring

Model Input Sheet

Project: 60747601 - Rio Americano High School EIR

Date: **29Aug**

Site: LT-01 (R)

Hour	Leq	Lmax	L50	L90
16:00	57.0	77.2	54.6	49.8
17:00	67.1	89.6	58.4	52.9
18:00	65.0	84.6	60.4	56.2
19:00	72.6	96.0	66.1	62.6
20:00	70.9	91.3	67.4	63.2
21:00	67.5	88.6	63.4	60.6

Averages

	Leq	Lmax	L50	L90
Reference Measurement Period (4:00 p.m. – 10:00 p.m.)	68.7	87.9	61.7	57.6

Uppermost-Level

	Leq	Lmax	L50	L90
Reference Measurement Period (4:00 p.m. – 10:00 p.m.)	72.6	96.0	67.4	63.2

The Uppermost-Level values represent the highest individual hourly values.

LT-02-Ldn (R)

Long-Term Six-Hour Continuous Noise Monitoring

Model Input Sheet

Project: 60747601 - Rio Americano High School EIR

Date: **29Aug**

Site: LT-02 (R)

Hour	Leq	Lmax	L50	L90
16:00	71.5	87.7	67.8	58.5
17:00	77.0	95.9	64.6	55.3
18:00	72.3	87.2	65.9	59.8
19:00	79.2	93.4	76.9	68.5
20:00	84.1	99.5	76.6	65.5
21:00	74.5	92.2	66.0	61.4

Averages

	Leq	Lmax	L50	L90
Reference Measurement Period (4:00 p.m. – 10:00 p.m.)	78.7	92.7	69.6	61.5

Uppermost-Level

	Leq	Lmax	L50	L90
Reference Measurement Period (4:00 p.m. – 10:00 p.m.)	84.1	99.5	76.9	68.5

The Uppermost-Level values represent the highest individual hourly values.

LT-01-Ldn (Feb)

Long-Term 24 Hour Continuous Noise Monitoring

Model Input Sheet

Project: 60747601 - Rio Americano High School EIR

Date: **Wednesday, February 4, 2026** **Thursday, February 5, 2026**

Site: LT-01 (Feb)

Hour	Leq	Lmax	L50	L90
14:00	47.5	70.7	38.4	35.8
15:00	48.9	70.1	41.8	36.6
16:00	45.6	61.3	40.7	35.7
17:00	45.8	64.1	43.3	40.5
18:00	49.1	66.2	43.9	40.5
19:00	44.9	63.4	40.3	39.0
20:00	44.9	64.0	40.8	39.5
21:00	45.8	65.0	42.5	41.2
22:00	46.8	66.6	43.5	42.1
23:00	45.8	54.0	45.2	43.4
0:00	44.2	58.9	43.1	41.3
1:00	43.6	52.5	43.0	41.2
2:00	43.5	53.2	42.7	40.5
3:00	45.8	56.7	45.2	43.4
4:00	48.0	55.7	47.6	45.6
5:00	49.6	56.3	49.3	47.8
6:00	51.3	66.7	50.0	48.3
7:00	46.4	59.7	44.9	43.5
8:00	48.0	58.3	47.6	46.4
9:00	49.0	63.9	47.3	45.1
10:00	46.6	60.2	44.0	41.9
11:00	41.9	56.6	39.9	37.7
12:00	44.0	63.8	40.0	38.2
13:00	43.9	55.7	41.0	38.6

Averages

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	46.6	62.9	42.4	40.0
Nighttime (10 p.m. - 7 a.m.)	47.3	57.8	45.5	43.7

Uppermost-Level

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	49.1	70.7	47.6	46.4
Nighttime (10 p.m. - 7 a.m.)	51.3	66.7	50.0	48.3

Percentage of Energy

Daytime	59%
Nighttime	41%

Calculated L_{dn}, dBA

53.6

LT-02-Ldn (Feb)

Long-Term 24 Hour Continuous Noise Monitoring

Model Input Sheet

Project: 60747601 - Rio Americano High School EIR

Date: **Wednesday, February 4, 2026** **Thursday, February 5, 2026**

Site: LT-02 (Feb)

Hour	Leq	Lmax	L50	L90
15:00	51.9	72.5	46.7	42.2
16:00	53.5	74.9	49.9	45.8
17:00	56.9	71.9	55.9	54.3
18:00	58.3	75.3	56.8	55.5
19:00	54.9	65.1	54.8	52.5
20:00	49.8	65.6	47.4	45.0
21:00	45.4	59.5	44.3	43.1
22:00	46.0	65.8	43.8	42.5
23:00	45.5	54.8	44.7	43.1
0:00	44.6	57.8	43.6	41.7
1:00	42.0	56.9	40.8	39.5
2:00	41.8	53.6	41.1	39.5
3:00	45.9	51.2	45.6	43.8
4:00	47.4	52.6	47.1	45.7
5:00	51.0	58.8	50.7	49.1
6:00	52.9	65.3	51.8	50.0
7:00	48.9	67.6	48.1	46.9
8:00	49.5	55.9	49.4	48.2
9:00	48.6	58.5	47.4	45.6
10:00	49.4	70.6	46.0	43.5
11:00	49.7	68.7	46.3	42.9
12:00	58.8	74.4	46.0	44.0
13:00	52.0	75.8	47.6	44.3
14:00	46.8	65.4	44.8	42.8

Averages

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	53.5	68.1	48.8	46.4
Nighttime (10 p.m. - 7 a.m.)	47.8	57.4	45.4	43.9

Uppermost-Level

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	58.8	75.8	56.8	55.5
Nighttime (10 p.m. - 7 a.m.)	52.9	65.8	51.8	50.0

Percentage of Energy

Daytime	86%
Nighttime	14%

Calculated L_{dn}, dBA

55.7

LT-03-Ldn (Feb)

Long-Term 24 Hour Continuous Noise Monitoring

Model Input Sheet

Project: 60747601 - Rio Americano High School EIR

Date: **Wednesday, February 4, 2026** **Thursday, February 5, 2026**

Site: LT-03 (Feb)

Hour	Leq	Lmax	L50	L90
15:00	63.3	80.3	61.5	54.4
16:00	64.2	76.9	62.5	53.8
17:00	64.1	76.4	62.8	56.4
18:00	60.8	78.0	58.3	53.3
19:00	59.7	77.6	56.1	52.1
20:00	59.4	72.7	53.2	48.3
21:00	56.8	71.5	50.8	45.5
22:00	52.8	71.8	45.9	43.5
23:00	48.6	67.8	43.5	41.9
0:00	48.1	70.6	41.9	40.3
1:00	44.1	66.9	39.8	38.3
2:00	44.2	69.2	40.1	38.8
3:00	46.1	69.2	43.2	41.7
4:00	48.0	69.4	45.3	43.4
5:00	53.4	70.9	49.9	48.1
6:00	59.9	75.1	53.5	50.0
7:00	64.5	78.5	62.7	53.0
8:00	66.3	78.1	65.1	59.8
9:00	61.0	77.4	56.6	49.9
10:00	58.9	72.6	54.4	48.6
11:00	58.8	70.5	54.2	46.5
12:00	59.8	77.7	54.7	47.7
13:00	60.7	76.8	57.2	49.1
14:00	63.4	79.1	61.5	53.6

Averages

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	62.2	76.3	58.1	51.5
Nighttime (10 p.m. - 7 a.m.)	52.7	70.1	44.8	42.9

Uppermost-Level

	Leq	Lmax	L50	L90
Daytime (7 a.m. - 10 p.m.)	66.3	80.3	65.1	59.8
Nighttime (10 p.m. - 7 a.m.)	59.9	75.1	53.5	50.0

Percentage of Energy

Daytime	94%
Nighttime	6%

Calculated L_{dn}, dBA

62.4

SLM & RTA Summary

Translated:	19-Sep-25	15:45:45
File Translated:	C:\Data\Projects\Rio Americano HS\Field\Ambient Measurements\STs\ST_001.slmdl	
Model Number:	824	
Serial Number:	A2624	
Firmware Rev:	4.29	
Software Version:	3.12	
Name:	AECOM	
Descr1:	2020 L St	
Descr2:	Sacramento, CA	
Setup:	SLM&RTA.ssa	
Setup Descr:	SLM & Real-Time Analyzer	
Location:		
Note 1:		
Note 2:		

Overall Any Data

Start Time:	17-Sep-25	14:04:38	
Elapsed Time:	20:00.3		
	A Weight	C Weight	Flat
Leq:	62.1 dBA	67.1 dBC	68.5 dBF
SEL:	93.0 dBA	97.9 dBC	99.3 dBF
Peak:	89.7 dBA	97.4 dBC	98.8 dBF
	9/17/2025 14:19	9/17/2025 14:08	9/17/2025 14:08
Lmax (slow):	75.2 dBA	81.3 dBC	82.1 dBF
	9/17/2025 14:22	9/17/2025 14:22	9/17/2025 14:22
Lmin (slow):	39.7 dBA	52.8 dBC	54.2 dBF
	9/17/2025 14:10	9/17/2025 14:15	9/17/2025 14:15
Lmax (fast):	77.3 dBA	85.0 dBC	88.0 dBF
	9/17/2025 14:22	9/17/2025 14:08	9/17/2025 14:08
Lmin (fast):	39.3 dBA	51.3 dBC	52.9 dBF
	9/17/2025 14:10	9/17/2025 14:10	9/17/2025 14:10
Lmax (impulse):	78.2 dBA	88.5 dBC	91.1 dBF
	9/17/2025 14:22	9/17/2025 14:08	9/17/2025 14:08
Lmin (impulse):	39.7 dBA	53.5 dBC	55.2 dBF
	9/17/2025 14:10	9/17/2025 14:10	9/17/2025 14:15

Spectra

Start Time:	17-Sep-25	14:04:38	Run Time:	20:00.3		
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	57.1		75.9		26.5	
16	56.3	61.4	73.6	78.3	29.6	36.3
20	56.5		67.4		34.7	
25	56.3		68.4		35.5	
31.5	55.1	60.7	65.9	71.8	34	40.5
40	56.4		66.5		37.1	
50	56.6		64.2		35.6	
63	57.5	61.4	66.1	73.4	37.6	42.2
80	55.5		71.8		38.5	
100	57.9		80.9		38.7	
125	55	60.4	67.8	81.2	38	42.3
160	51.8		65		35.2	
200	52.6		66.4		34.7	
250	51.9	56.5	64.8	69.6	33.1	37.8
315	50.3		62.5		30	
400	50.6		63.7		27.7	
500	51.1	56.2	67	71	27.9	32.3
630	52.3		67.2		27	
800	54.8		68.2		27.7	
1000	55.5	59.7	67.1	72.1	27.9	32.2
1250	54.4		66.4		26.5	
1600	52.6		64.1		24.5	
2000	48.9	54.7	61.6	67.4	22.3	27.7
2500	45.6		61.6		21.3	
3150	43		60.5		19.7	
4000	40.6	45.9	61.1	66	19	23.9
5000	38.8		62		18.6	
6300	35.9		55.6		18.6	
8000	34.3	38.8	54.7	58.5	18.8	23.6
10000	30.2		46.6		19.1	
12500	26.4		41		19.4	
16000	23.4	29.4	34.1	42	20.5	25.6
20000	23.2		27.7		22.1	

Ln Start Level:	15 dB	
L 2.00	70.3	dBA
L 8.00	67.5	dBA
L 25.00	63	dBA
L 50.00	55.6	dBA
L 90.00	44.3	dBA
L 95.00	42.7	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	45 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:	17-Sep-25	14:04:38	
Elapsed Time:	20:00.3		
	A Weight	C Weight	Flat
Leq:	62.1 dBA	67.1 dBC	68.5 dBF
SEL:	93.0 dBA	97.9 dBC	99.3 dBF
Peak:	89.7 dBA	97.4 dBC	98.8 dBF
	9/17/2025 14:19	9/17/2025 14:08	9/17/2025 14:08
Lmax (slow):	75.2 dBA	81.3 dBC	82.1 dBF
	9/17/2025 14:22	9/17/2025 14:22	9/17/2025 14:22
Lmin (slow):	39.7 dBA	52.8 dBC	54.2 dBF
	9/17/2025 14:10	9/17/2025 14:15	9/17/2025 14:15
Lmax (fast):	77.3 dBA	85.0 dBC	88.0 dBF
	9/17/2025 14:22	9/17/2025 14:08	9/17/2025 14:08
Lmin (fast):	39.3 dBA	51.3 dBC	52.9 dBF
	9/17/2025 14:10	9/17/2025 14:10	9/17/2025 14:10
Lmax (impulse):	78.2 dBA	88.5 dBC	91.1 dBF
	9/17/2025 14:22	9/17/2025 14:08	9/17/2025 14:08
Lmin (impulse):	39.7 dBA	53.5 dBC	55.2 dBF
	9/17/2025 14:10	9/17/2025 14:10	9/17/2025 14:15

Calibrated:	1/1/2000 2:45	Offset:	-46.3 dB
Checked:	9/17/2025 15:41	Level:	113.9 dB
Calibrator	597860	Level:	114.0 dB
Cal Records Count:	0		

Interval Records:	Enabled	Number Interval Records:	21
History Records:	Enabled	Number History Records:	4803
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		19-Sep-25	15:46:12
File Translated:	C:\Data\Projects\Rio Americano HS\Field\Ambient Measurements\STs\ST_002.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		17-Sep-25	14:33:59
Elapsed Time:		20:00.5	

	A Weight	C Weight	Flat
Leq:	57.3 dBA	63.6 dBC	66.0 dBF
SEL:	88.1 dBA	94.4 dBC	96.8 dBF
Peak:	99.9 dBA	99.4 dBC	99.6 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmax (slow):	85.5 dBA	85.7 dBC	85.7 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmin (slow):	44.5 dBA	56.8 dBC	58.3 dBF
		9/17/2025 14:37	9/17/2025 14:37	9/17/2025 14:37
Lmax (fast):	91.3 dBA	91.6 dBC	91.6 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmin (fast):	44.1 dBA	55.6 dBC	57.1 dBF
		9/17/2025 14:37	9/17/2025 14:37	9/17/2025 14:36
Lmax (impulse):	92.6 dBA	92.8 dBC	92.8 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmin (impulse):	44.4 dBA	58.0 dBC	59.3 dBF
		9/17/2025 14:37	9/17/2025 14:44	9/17/2025 14:37

Spectra

Start Time:		17-Sep-25	14:33:59	Run Time:	20:00.5		
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct		Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5		57.7		58		31.7	
16		56.1	62.4	60.3	64.6	34.1	41.1
20		58.8		60.7		39.4	
25		55.5		63.7		36.8	
31.5		52.6	58.8	63	66.8	38.7	42.5
40		53.4		56.9		37.5	
50		52.7		55.1		39	
63		54.1	58	53.9	58.9	42.6	46.6
80		52.7		53.3		43	
100		51.8		54.4		42.1	
125		50.4	55.5	52.6	57.7	39.3	45.4
160		49.7		51.3		40.1	
200		46		49.1		37.4	
250		46.3	51	58.6	61.4	37.2	41.7
315		46.3		57.6		36	
400		44.7		56.1		34.4	
500		44.8	51.2	55.9	78.4	33.4	38.2
630		48.6		78.3		32.4	
800		52.2		87.4		32.6	
1000		50.3	55.2	87.3	90.7	32.4	37.1
1250		47.9		79.8		32.1	
1600		46.6		78.6		30.5	
2000		44.4	48.9	76.3	80.6	30.2	34.5
2500		37		57.2		28.3	
3150		35.8		60.4		26.1	
4000		35.8	39.5	67	68.4	24.4	29.4
5000		31.3		59.3		22.9	
6300		27.2		53.4		20	
8000		26.9	31	56.3	58.9	19.2	24.2
10000		23.7		51.1		18.9	
12500		22.3		51.6		19.3	
16000		21.6	27	37.7	51.8	20.5	25.6
20000		22.8		30.4		22.1	

Ln Start Level:	15 dB	
L 2.00	60.6	dBA
L 8.00	56.6	dBA
L 25.00	53.6	dBA
L 50.00	49.8	dBA
L 90.00	46.1	dBA
L 95.00	45.4	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	3 times
SPL Exceedance level 2:	80 dB	Exceeded:	1 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		17-Sep-25	14:33:59
Elapsed Time:		20:00.5	

	A Weight	C Weight	Flat
Leq:	57.3 dBA	63.6 dBC	66.0 dBF
SEL:	88.1 dBA	94.4 dBC	96.8 dBF
Peak:	99.9 dBA	99.4 dBC	99.6 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmax (slow):	85.5 dBA	85.7 dBC	85.7 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmin (slow):	44.5 dBA	56.8 dBC	58.3 dBF
		9/17/2025 14:37	9/17/2025 14:37	9/17/2025 14:37
Lmax (fast):	91.3 dBA	91.6 dBC	91.6 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmin (fast):	44.1 dBA	55.6 dBC	57.1 dBF
		9/17/2025 14:37	9/17/2025 14:37	9/17/2025 14:36
Lmax (impulse):	92.6 dBA	92.8 dBC	92.8 dBF
		9/17/2025 14:47	9/17/2025 14:47	9/17/2025 14:47
Lmin (impulse):	44.4 dBA	58.0 dBC	59.3 dBF
		9/17/2025 14:37	9/17/2025 14:44	9/17/2025 14:37

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		9/17/2025 15:41	Level: 113.9 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	22
History Records:	Enabled	Number History Records:	4804
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		19-Sep-25	15:46:23
File Translated:	C:\Data\Projects\Rio Americano HS\Field\Ambient Measurements\STs\ST_003.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		17-Sep-25	15:13:04
Elapsed Time:		20:05.3	

	A Weight	C Weight	Flat
Leq:	55.4 dBA	62.6 dBC	66.3 dBF
SEL:	86.2 dBA	93.5 dBC	97.1 dBF
Peak:	101.1 dBA	100.8 dBC	101.0 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmax (slow):	84.2 dBA	84.7 dBC	84.7 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmin (slow):	41.1 dBA	56.0 dBC	57.4 dBF
		9/17/2025 15:31	9/17/2025 15:15	9/17/2025 15:15
Lmax (fast):	89.9 dBA	90.5 dBC	90.4 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmin (fast):	40.5 dBA	53.4 dBC	55.4 dBF
		9/17/2025 15:22	9/17/2025 15:15	9/17/2025 15:15
Lmax (impulse):	91.7 dBA	92.3 dBC	92.3 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmin (impulse):	41.0 dBA	56.9 dBC	58.2 dBF
		9/17/2025 15:31	9/17/2025 15:15	9/17/2025 15:15

Spectra

Start Time:	17-Sep-25	15:13:04	Run Time:	20:05.3		
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	60.5		66.5		28.3	
16	58.5	63.8	66	70.1	31.7	37.4
20	57.7		62.7		35.2	
25	57.3		63.1		40.5	
31.5	54.7	60.2	59.6	65.7	38.7	44.2
40	53.1		58.6		38.7	
50	51.5		57		39.8	
63	51.4	57	56.4	61.5	41.4	45.4
80	53.4		56.9		40.6	
100	48.6		60.6		40.5	
125	44.6	50.5	52.3	62.4	36.8	42.4
160	39.9		56.4		31.4	
200	36.9		59.9		28.7	
250	37.5	42.3	59.2	66.3	29.5	33.9
315	38.1		63.9		29.1	
400	39.1		64.7		29.3	
500	39.7	51.2	72.3	82.8	29.5	34
630	50.6		82.3		28.9	
800	49.1		78.4		29.4	
1000	45	52.3	78.8	83.4	28.8	33.3
1250	47.5		78.8		27.2	
1600	46.2		74.5		24.9	
2000	38.6	47.5	69.1	76.2	23.2	28
2500	38.3		67.5		20.6	
3150	37.4		68.5		19	
4000	35.4	40.5	66.3	71.3	18	23
5000	33.3		63.1		17.6	
6300	28.4		49		17.7	
8000	31.5	34.6	50.7	55.1	18.4	23.1
10000	28.9		51.1		18.9	
12500	25.6		45.7		19.3	
16000	22.9	28.8	42.4	47.6	20.6	25.6
20000	23.1		34		22.2	

Ln Start Level:	15 dB	
L 2.00	52.4	dBA
L 8.00	46.6	dBA
L 25.00	44.2	dBA
L 50.00	43	dBA
L 90.00	41.7	dBA
L 95.00	41.6	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	1 times
SPL Exceedance level 2:	80 dB	Exceeded:	1 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	1 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		17-Sep-25	15:13:04
Elapsed Time:		20:05.3	

	A Weight	C Weight	Flat
Leq:	55.4 dBA	62.6 dBC	66.3 dBF
SEL:	86.2 dBA	93.5 dBC	97.1 dBF
Peak:	101.1 dBA	100.8 dBC	101.0 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmax (slow):	84.2 dBA	84.7 dBC	84.7 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmin (slow):	41.1 dBA	56.0 dBC	57.4 dBF
		9/17/2025 15:31	9/17/2025 15:15	9/17/2025 15:15
Lmax (fast):	89.9 dBA	90.5 dBC	90.4 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmin (fast):	40.5 dBA	53.4 dBC	55.4 dBF
		9/17/2025 15:22	9/17/2025 15:15	9/17/2025 15:15
Lmax (impulse):	91.7 dBA	92.3 dBC	92.3 dBF
		9/17/2025 15:28	9/17/2025 15:28	9/17/2025 15:28
Lmin (impulse):	41.0 dBA	56.9 dBC	58.2 dBF
		9/17/2025 15:31	9/17/2025 15:15	9/17/2025 15:15

Calibrated:	1/1/2000 2:45	Offset:	-46.3 dB
Checked:	9/17/2025 15:41	Level:	113.9 dB
Calibrator	597860	Level:	114.0 dB
Cal Records Count:	0		

Interval Records:	Enabled	Number Interval Records:	21
History Records:	Enabled	Number History Records:	4823
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		19-Sep-25	18:14:59
File Translated:	C:\Data\Projects\Rio Americano HS\Field\El Camino HS Reference Levels\ST_001.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		29-Aug-25	19:32:56
Elapsed Time:		20:00.6	

	A Weight	C Weight	Flat
Leq:	66.3 dBA	68.9 dBC	69.5 dBF
SEL:	97.1 dBA	99.8 dBC	100.3 dBF
Peak:	98.5 dBA	98.0 dBC	98.1 dBF
		8/29/2025 19:39	8/29/2025 19:39 8/29/2025 19:39
Lmax (slow):	78.7 dBA	80.9 dBC	81.1 dBF
		8/29/2025 19:39	8/29/2025 19:33 8/29/2025 19:33
Lmin (slow):	57.6 dBA	62.1 dBC	63.2 dBF
		8/29/2025 19:36	8/29/2025 19:36 8/29/2025 19:36
Lmax (fast):	80.6 dBA	84.6 dBC	84.8 dBF
		8/29/2025 19:39	8/29/2025 19:33 8/29/2025 19:33
Lmin (fast):	54.9 dBA	60.9 dBC	61.9 dBF
		8/29/2025 19:36	8/29/2025 19:44 8/29/2025 19:36
Lmax (impulse):	81.8 dBA	85.8 dBC	86.0 dBF
		8/29/2025 19:39	8/29/2025 19:33 8/29/2025 19:33
Lmin (impulse):	57.4 dBA	62.1 dBC	63.2 dBF
		8/29/2025 19:42	8/29/2025 19:36 8/29/2025 19:36

Spectra

Start Time:		29-Aug-25	19:32:56	Run Time:	20:00.6	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	50		52.3		29.6	
16	53.1	57.6	56.3	64.1	35	39.5
20	54.3		63		36.9	
25	59.4		64.3		41.4	
31.5	56.4	62.1	62.2	67.2	37.1	44.8
40	55.2		59.3		40.6	
50	55.7		61		43.6	
63	58.4	62.2	59	64.5	43.2	47.7
80	57.8		58.7		41.9	
100	56.9		55.7		42.8	
125	51.8	58.6	54.6	59	42.2	46.5
160	49.5		51.4		39.4	
200	49.8		51.6		39.7	
250	48.5	54.3	49.8	59.1	41.4	45.1
315	50.1		57.6		39.8	
400	53.6		58		41.3	
500	55.5	61.1	58.1	67.2	45	50.1
630	58.5		66		47.6	
800	60		72.3		47.5	
1000	59.4	63.9	74.3	78.8	45	50.3
1250	57.7		75.1		43.1	
1600	56.1		71.6		44.2	
2000	53.8	58.8	67.6	73.4	41.8	46.9
2500	50.6		62.6		38.5	
3150	48.8		61.7		36.7	
4000	48.3	51.9	59	64.1	34.3	39.2
5000	40.6		54.4		29.5	
6300	36.3		49.7		24.6	
8000	33.8	38.8	46.6	52.1	22.4	27.6
10000	29.4		43.7		20.3	
12500	26		40.1		19.3	
16000	23.2	29.1	31.3	40.9	20.4	25.5
20000	23.3		27.7		22	

Ln Start Level:	15 dB	
L 2.00	73.9	dBA
L 8.00	70	dBA
L 25.00	66.4	dBA
L 50.00	63.5	dBA
L 90.00	60.3	dBA
L 95.00	59.7	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	40 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		29-Aug-25	19:32:56
Elapsed Time:		20:00.6	

	A Weight	C Weight	Flat
Leq:	66.3 dBA	68.9 dBC	69.5 dBF
SEL:	97.1 dBA	99.8 dBC	100.3 dBF
Peak:	98.5 dBA	98.0 dBC	98.1 dBF
		8/29/2025 19:39	8/29/2025 19:39 8/29/2025 19:39
Lmax (slow):	78.7 dBA	80.9 dBC	81.1 dBF
		8/29/2025 19:39	8/29/2025 19:33 8/29/2025 19:33
Lmin (slow):	57.6 dBA	62.1 dBC	63.2 dBF
		8/29/2025 19:36	8/29/2025 19:36 8/29/2025 19:36
Lmax (fast):	80.6 dBA	84.6 dBC	84.8 dBF
		8/29/2025 19:39	8/29/2025 19:33 8/29/2025 19:33
Lmin (fast):	54.9 dBA	60.9 dBC	61.9 dBF
		8/29/2025 19:36	8/29/2025 19:44 8/29/2025 19:36
Lmax (impulse):	81.8 dBA	85.8 dBC	86.0 dBF
		8/29/2025 19:39	8/29/2025 19:33 8/29/2025 19:33
Lmin (impulse):	57.4 dBA	62.1 dBC	63.2 dBF
		8/29/2025 19:42	8/29/2025 19:36 8/29/2025 19:36

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		8/29/2025 21:01	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	21
History Records:	Enabled	Number History Records:	4804
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		19-Sep-25	18:15:21
File Translated:	C:\Data\Projects\Rio Americano HS\Field\El Camino HS Reference Levels\ST_002.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		29-Aug-25	20:02:34
Elapsed Time:		20:00.6	

	A Weight	C Weight	Flat
Leq:	77.7 dBA	78.7 dBC	78.8 dBF
SEL:	108.5 dBA	109.5 dBC	109.6 dBF
Peak:	108.1 dBA	106.1 dBC	106.6 dBF
		8/29/2025 20:14	8/29/2025 20:14	8/29/2025 20:14
Lmax (slow):	89.7 dBA	88.6 dBC	88.7 dBF
		8/29/2025 20:11	8/29/2025 20:11	8/29/2025 20:11
Lmin (slow):	71.9 dBA	73.3 dBC	73.4 dBF
		8/29/2025 20:15	8/29/2025 20:15	8/29/2025 20:15
Lmax (fast):	95.4 dBA	94.1 dBC	94.3 dBF
		8/29/2025 20:11	8/29/2025 20:11	8/29/2025 20:11
Lmin (fast):	69.9 dBA	71.4 dBC	71.6 dBF
		8/29/2025 20:06	8/29/2025 20:15	8/29/2025 20:15
Lmax (impulse):	97.0 dBA	95.7 dBC	95.8 dBF
		8/29/2025 20:11	8/29/2025 20:11	8/29/2025 20:11
Lmin (impulse):	71.8 dBA	73.2 dBC	73.3 dBF
		8/29/2025 20:04	8/29/2025 20:04	8/29/2025 20:04

Spectra

Start Time:		29-Aug-25	20:02:34	Run Time:	20:00.6	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5		49.8		52.4	30.9	
16		52	56.9	50.8	57.3	33.6	39.7
20		53.7		53.9		37.6	
25		56.1		56.5		39.1	
31.5		55.1	60.2	55.1	60	40.7	45.4
40		54.9		53.7		41.8	
50		54.4		53.7		41.2	
63		57.7	61.1	59.7	62.2	44	48.3
80		56.3		57		44.6	
100		53.1		56.4		43.5	
125		53.3	59	55.1	63.1	44.4	50.2
160		55.7		61		47.3	
200		59.8		65.7		48.1	
250		61.6	66.9	65.5	69.9	50	55.2
315		63.9		64.1		52.3	
400		64.8		71.4		55.8	
500		68.4	73.8	72.1	78.7	59.9	64.9
630		71.4		76.5		62.3	
800		71.4		80.4		60.2	
1000		69.5	74.6	72.5	81.9	57.6	63.4
1250		68.1		74.5		57.6	
1600		67.6		76.8		58.1	
2000		65.9	70.6	93.5	93.6	55.4	60.7
2500		62.4		64.4		52.9	
3150		60.6		66.7		51.3	
4000		59.4	63.5	81.9	82.1	49	53.8
5000		52.9		59.6		44.1	
6300		49.2		56.8		39.3	
8000		47.5	52	52.9	59.2	37.9	42.3
10000		43.1		51.9		33.3	
12500		37.6		46.9		27.6	
16000		31.3	38.8	40.9	48	23.8	30.1
20000		26.7		31.9		23	

Ln Start Level:	15 dB	
L 2.00		82.2 dBA
L 8.00		80.1 dBA
L 25.00		78.3 dBA
L 50.00		76.9 dBA
L 90.00		74.8 dBA
L 95.00		74.3 dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	1 times
SPL Exceedance level 2:	80 dB	Exceeded:	43 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	11 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		29-Aug-25	20:02:34
Elapsed Time:		20:00.6	

	A Weight	C Weight	Flat
Leq:	77.7 dBA	78.7 dBC	78.8 dBF
SEL:	108.5 dBA	109.5 dBC	109.6 dBF
Peak:	108.1 dBA	106.1 dBC	106.6 dBF
		8/29/2025 20:14	8/29/2025 20:14	8/29/2025 20:14
Lmax (slow):	89.7 dBA	88.6 dBC	88.7 dBF
		8/29/2025 20:11	8/29/2025 20:11	8/29/2025 20:11
Lmin (slow):	71.9 dBA	73.3 dBC	73.4 dBF
		8/29/2025 20:15	8/29/2025 20:15	8/29/2025 20:15
Lmax (fast):	95.4 dBA	94.1 dBC	94.3 dBF
		8/29/2025 20:11	8/29/2025 20:11	8/29/2025 20:11
Lmin (fast):	69.9 dBA	71.4 dBC	71.6 dBF
		8/29/2025 20:06	8/29/2025 20:15	8/29/2025 20:15
Lmax (impulse):	97.0 dBA	95.7 dBC	95.8 dBF
		8/29/2025 20:11	8/29/2025 20:11	8/29/2025 20:11
Lmin (impulse):	71.8 dBA	73.2 dBC	73.3 dBF
		8/29/2025 20:04	8/29/2025 20:04	8/29/2025 20:04

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		8/29/2025 21:01	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	21
History Records:	Enabled	Number History Records:	4804
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		19-Sep-25	18:15:32
File Translated:	C:\Data\Projects\Rio Americano HS\Field\El Camino HS Reference Levels\ST_003.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		29-Aug-25	20:27:39
Elapsed Time:		20:00.6	

	A Weight	C Weight	Flat
Leq:	68.6 dBA	72.7 dBC	72.8 dBF
SEL:	99.4 dBA	103.5 dBC	103.6 dBF
Peak:	94.2 dBA	97.2 dBC	97.5 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmax (slow):	80.3 dBA	83.9 dBC	83.9 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmin (slow):	56.2 dBA	61.6 dBC	62.3 dBF
		8/29/2025 20:31	8/29/2025 20:31	8/29/2025 20:31
Lmax (fast):	84.2 dBA	87.9 dBC	88.0 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmin (fast):	55.3 dBA	60.7 dBC	61.4 dBF
		8/29/2025 20:31	8/29/2025 20:31	8/29/2025 20:31
Lmax (impulse):	86.3 dBA	89.8 dBC	89.8 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmin (impulse):	56.5 dBA	61.9 dBC	62.6 dBF
		8/29/2025 20:31	8/29/2025 20:30	8/29/2025 20:30

Spectra

Start Time:		29-Aug-25	20:27:39	Run Time:	20:00.6	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	45.3		45.2		28.3	
16	47.2	52.3	50	55.2	30	36.5
20	49.2		53		34.4	
25	50		53.9		37.9	
31.5	51.8	59.1	57	60.8	38.8	43.9
40	57.5		56.6		40.3	
50	57.3		54.7		43.7	
63	56.2	61.8	58.8	62.7	43	48.6
80	57.6		59		44.7	
100	57.6		66.5		46.2	
125	56.1	63.6	64.3	73.4	45	49.4
160	61.1		71.7		41.3	
200	65.4		76.3		40.1	
250	60.8	68.3	71.4	80.6	40.3	45.6
315	63.2		77.7		41.8	
400	61.1		72.4		44.1	
500	60.6	65.2	69.3	75.3	46.5	51.2
630	59.5		68.9		47.8	
800	61		78.6		46.5	
1000	60.4	64.7	75.9	81	41.7	48.8
1250	57.7		71.3		42	
1600	57.2		67		43.3	
2000	56.4	60.6	68.7	71.8	42.4	47
2500	52.7		64.1		40.4	
3150	51.5		63		38.4	
4000	51	55.1	61	66.2	36.4	40.9
5000	47.5		59.7		29.6	
6300	45.9		59.5		24.4	
8000	42.9	47.9	54.3	60.8	22.4	27.4
10000	34.5		45		19.9	
12500	22.5		30.5		19	
16000	21.6	27.2	23.3	32.2	20.4	25.3
20000	23		25.1		21.8	

Ln Start Level:	15 dB	
L 2.00	77	dBA
L 8.00	74.1	dBA
L 25.00	68	dBA
L 50.00	65	dBA
L 90.00	59.9	dBA
L 95.00	59.2	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	20 times
SPL Exceedance level 2:	80 dB	Exceeded:	1 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		29-Aug-25	20:27:39
Elapsed Time:		20:00.6	

	A Weight	C Weight	Flat
Leq:	68.6 dBA	72.7 dBC	72.8 dBF
SEL:	99.4 dBA	103.5 dBC	103.6 dBF
Peak:	94.2 dBA	97.2 dBC	97.5 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmax (slow):	80.3 dBA	83.9 dBC	83.9 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmin (slow):	56.2 dBA	61.6 dBC	62.3 dBF
		8/29/2025 20:31	8/29/2025 20:31	8/29/2025 20:31
Lmax (fast):	84.2 dBA	87.9 dBC	88.0 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmin (fast):	55.3 dBA	60.7 dBC	61.4 dBF
		8/29/2025 20:31	8/29/2025 20:31	8/29/2025 20:31
Lmax (impulse):	86.3 dBA	89.8 dBC	89.8 dBF
		8/29/2025 20:39	8/29/2025 20:38	8/29/2025 20:38
Lmin (impulse):	56.5 dBA	61.9 dBC	62.6 dBF
		8/29/2025 20:31	8/29/2025 20:30	8/29/2025 20:30

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		8/29/2025 21:01	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	21
History Records:	Enabled	Number History Records:	4804
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:46:15
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_001.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	15:09:44
Elapsed Time:		15:03.1	

	A Weight	C Weight	Flat
Leq:	58.5 dBA	65.8 dBC	66.3 dBF
SEL:	88.1 dBA	95.4 dBC	95.8 dBF
Peak:	94.9 dBA	95.9 dBC	96.0 dBF
		2/4/2026 15:16	2/4/2026 15:24	2/4/2026 15:24
Lmax (slow):	73.2 dBA	85.5 dBC	85.7 dBF
		2/4/2026 15:24	2/4/2026 15:24	2/4/2026 15:24
Lmin (slow):	44.4 dBA	56.6 dBC	58.4 dBF
		2/4/2026 15:09	2/4/2026 15:09	2/4/2026 15:09
Lmax (fast):	76.7 dBA	87.6 dBC	87.8 dBF
		2/4/2026 15:17	2/4/2026 15:24	2/4/2026 15:24
Lmin (fast):	41.7 dBA	54.6 dBC	55.9 dBF
		2/4/2026 15:17	2/4/2026 15:16	2/4/2026 15:16
Lmax (impulse):	80.1 dBA	87.9 dBC	88.1 dBF
		2/4/2026 15:17	2/4/2026 15:24	2/4/2026 15:24
Lmin (impulse):	44.1 dBA	56.9 dBC	58.9 dBF
		2/4/2026 15:09	2/4/2026 15:09	2/4/2026 15:09

Spectra

Start Time:		4-Feb-26	15:09:44	Run Time:	15:03.1

Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	49.1		55.2		34.3	
16	49.6	54.4	55.3	61.3	34.4	38.7
20	50.1		58.4		32.8	
25	52.6		59.4		39.5	
31.5	51.6	56.6	59.7	64.1	38.2	43.8
40	51.2		58.8		39.4	
50	52.8		58.7		39.3	
63	51.7	57.3	62.1	69.2	39.7	44.6
80	53.1		67.7		40.4	
100	60.6		86.3		38.5	
125	59	63.2	78.5	87	38.2	42.4
160	51.9		66.2		35.6	
200	50.7		69.5		33.8	
250	50.4	54.8	68.1	73.5	36.6	39.1
315	48.9		68.4		30.3	
400	50.1		65.4		31	
500	50.8	55.6	65.7	70	30	35.1
630	51.6		64.6		29.9	
800	51.7		65.9		29.2	
1000	48.9	54.7	66.8	70.2	27.1	32.7
1250	48.6		62.3		27	
1600	46.1		61.1		25.8	
2000	44.5	49.2	59.6	64.5	25.3	29.7
2500	41.7		57.9		23.3	
3150	39.9		54.6		21.6	
4000	44.2	45.9	51.3	56.7	20.6	25.3
5000	34.7		46.8		19.1	
6300	32.1		42.2		18.6	
8000	30.9	35.3	38.8	44.2	18.8	23.5
10000	27.5		33.4		18.9	
12500	23.9		25.9		18.8	
16000	22.1	27.7	22.9	29.2	20.1	25.1
20000	22.6		23.8		21.6	

Ln Start Level:	15 dB	
L 2.00	67.4	dBA
L 8.00	61.7	dBA
L 25.00	57.7	dBA
L 50.00	54.6	dBA
L 90.00	50.2	dBA
L 95.00	49.1	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	12 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	15:09:44
Elapsed Time:		15:03.1	

	A Weight	C Weight	Flat
Leq:	58.5 dBA	65.8 dBC	66.3 dBF
SEL:	88.1 dBA	95.4 dBC	95.8 dBF
Peak:	94.9 dBA	95.9 dBC	96.0 dBF
		2/4/2026 15:16	2/4/2026 15:24	2/4/2026 15:24
Lmax (slow):	73.2 dBA	85.5 dBC	85.7 dBF
		2/4/2026 15:24	2/4/2026 15:24	2/4/2026 15:24
Lmin (slow):	44.4 dBA	56.6 dBC	58.4 dBF
		2/4/2026 15:09	2/4/2026 15:09	2/4/2026 15:09
Lmax (fast):	76.7 dBA	87.6 dBC	87.8 dBF
		2/4/2026 15:17	2/4/2026 15:24	2/4/2026 15:24
Lmin (fast):	41.7 dBA	54.6 dBC	55.9 dBF
		2/4/2026 15:17	2/4/2026 15:16	2/4/2026 15:16
Lmax (impulse):	80.1 dBA	87.9 dBC	88.1 dBF
		2/4/2026 15:17	2/4/2026 15:24	2/4/2026 15:24
Lmin (impulse):	44.1 dBA	56.9 dBC	58.9 dBF
		2/4/2026 15:09	2/4/2026 15:09	2/4/2026 15:09

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	16
History Records:	Enabled	Number History Records:	3614
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:46:52
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_002.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	15:32:52
Elapsed Time:		15:09.0	

	A Weight	C Weight	Flat
Leq:	52.8 dBA	65.5 dBC	66.2 dBF
SEL:	82.4 dBA	95.1 dBC	95.8 dBF
Peak:	83.6 dBA	89.2 dBC	90.2 dBF
		2/4/2026 15:39	2/4/2026 15:34 2/4/2026 15:34
Lmax (slow):	66.7 dBA	80.7 dBC	80.8 dBF
		2/4/2026 15:39	2/4/2026 15:47 2/4/2026 15:47
Lmin (slow):	45.9 dBA	58.1 dBC	59.4 dBF
		2/4/2026 15:35	2/4/2026 15:33 2/4/2026 15:33
Lmax (fast):	73.5 dBA	82.4 dBC	82.6 dBF
		2/4/2026 15:39	2/4/2026 15:47 2/4/2026 15:47
Lmin (fast):	45.0 dBA	56.9 dBC	57.8 dBF
		2/4/2026 15:33	2/4/2026 15:46 2/4/2026 15:46
Lmax (impulse):	75.4 dBA	82.8 dBC	83.0 dBF
		2/4/2026 15:39	2/4/2026 15:47 2/4/2026 15:47
Lmin (impulse):	45.8 dBA	59.1 dBC	60.6 dBF
		2/4/2026 15:35	2/4/2026 15:33 2/4/2026 15:46

Spectra

Start Time:		4-Feb-26	15:32:52	Run Time:	15:09.0	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	48.6		49.7		34.1	
16	49.4	54.6	49.6	57	32.4	38.1
20	51.2		55		33.4	
25	54.8		60.6		40	
31.5	53.4	58.3	56.1	63.2	38.9	43.7
40	51.9		57.2		37.6	
50	56.7		57.1		38.4	
63	51.9	59.4	54	60.4	39.6	44.5
80	54.1		55.3		40.9	
100	60.1		53.6		38.9	
125	60.1	63.3	73	73.1	38.6	43.2
160	49.7		50		37.7	
200	47.3		49.1		35.3	
250	54.3	55.6	66.7	67	47.6	48
315	46.1		53.9		33.3	
400	45.2		54.1		31.7	
500	44.5	49.2	49.8	56.3	31	35.6
630	43.4		48.4		29.4	
800	41.3		45.7		29	
1000	38.6	44.4	44.4	49.1	28.4	33
1250	38.2		42.3		27.2	
1600	38.6		47.1		26	
2000	37.2	42	41.3	48.7	24.7	29.7
2500	35.2		39.3		23.8	
3150	34		53.3		22.6	
4000	38.4	40.2	69.2	69.3	20.7	25.8
5000	29.7		39.8		19.3	
6300	30.4		30.3		18.5	
8000	26.8	32.6	39.9	40.5	18.7	23.4
10000	23.6		24		18.8	
12500	22.5		25.4		18.8	
16000	21.3	26.9	21.9	28.6	20.1	25.1
20000	22.4		23.4		21.6	

Ln Start Level:	15 dB	
L 2.00	59.4	dBA
L 8.00	56.3	dBA
L 25.00	52.6	dBA
L 50.00	50.5	dBA
L 90.00	47.9	dBA
L 95.00	47.5	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	1 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	15:32:52
Elapsed Time:		15:09.0	

	A Weight	C Weight	Flat
Leq:	52.8 dBA	65.5 dBC	66.2 dBF
SEL:	82.4 dBA	95.1 dBC	95.8 dBF
Peak:	83.6 dBA	89.2 dBC	90.2 dBF
		2/4/2026 15:39	2/4/2026 15:34 2/4/2026 15:34
Lmax (slow):	66.7 dBA	80.7 dBC	80.8 dBF
		2/4/2026 15:39	2/4/2026 15:47 2/4/2026 15:47
Lmin (slow):	45.9 dBA	58.1 dBC	59.4 dBF
		2/4/2026 15:35	2/4/2026 15:33 2/4/2026 15:33
Lmax (fast):	73.5 dBA	82.4 dBC	82.6 dBF
		2/4/2026 15:39	2/4/2026 15:47 2/4/2026 15:47
Lmin (fast):	45.0 dBA	56.9 dBC	57.8 dBF
		2/4/2026 15:33	2/4/2026 15:46 2/4/2026 15:46
Lmax (impulse):	75.4 dBA	82.8 dBC	83.0 dBF
		2/4/2026 15:39	2/4/2026 15:47 2/4/2026 15:47
Lmin (impulse):	45.8 dBA	59.1 dBC	60.6 dBF
		2/4/2026 15:35	2/4/2026 15:33 2/4/2026 15:46

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	17
History Records:	Enabled	Number History Records:	3638
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:47:04
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_003.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	15:50:25
Elapsed Time:		15:01.1	

	A Weight	C Weight	Flat
Leq:	52.7 dBA	60.1 dBC	60.9 dBF
SEL:	82.2 dBA	89.7 dBC	90.5 dBF
Peak:	95.1 dBA	93.2 dBC	93.6 dBF
		2/4/2026 16:01	2/4/2026 16:01 2/4/2026 16:01
Lmax (slow):	67.8 dBA	73.4 dBC	73.5 dBF
		2/4/2026 15:50	2/4/2026 15:50 2/4/2026 15:50
Lmin (slow):	40.3 dBA	53.0 dBC	54.4 dBF
		2/4/2026 15:54	2/4/2026 15:56 2/4/2026 15:56
Lmax (fast):	73.9 dBA	78.8 dBC	78.8 dBF
		2/4/2026 15:50	2/4/2026 15:50 2/4/2026 15:50
Lmin (fast):	38.4 dBA	51.2 dBC	52.8 dBF
		2/4/2026 15:54	2/4/2026 15:56 2/4/2026 15:58
Lmax (impulse):	76.2 dBA	81.0 dBC	80.9 dBF
		2/4/2026 15:50	2/4/2026 15:50 2/4/2026 15:50
Lmin (impulse):	40.8 dBA	53.5 dBC	54.9 dBF
		2/4/2026 15:54	2/4/2026 15:56 2/4/2026 15:56

Spectra

Start Time:		4-Feb-26	15:50:25
Run Time:		15:01.1	

Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	46.7		50.9		26.6	
16	47.7	52.3	49.7	54.7	32.6	35.4
20	48		48.9		30.8	
25	48.9		51.5		35.4	
31.5	50	54.3	48.6	55.3	35.8	40.5
40	49.6		51.1		36.1	
50	49.4		50.3		34.2	
63	50.9	54.4	53.7	57.4	36	40.1
80	48.3		53.1		35.6	
100	48.7		55.3		34.7	
125	52.1	54.7	68.6	70.8	35.4	39.3
160	47.8		66.4		33.3	
200	45.3		49.7		29	
250	48.2	51.5	68.2	69.8	37.7	38.5
315	46		64.7		26.3	
400	47.5		76.3		26.5	
500	46.7	51.4	69.5	77.4	25.9	30.5
630	45.3		65.3		24.5	
800	42.3		61.7		24.4	
1000	39.9	45.8	56	63.4	23.8	28.4
1250	40.5		54.8		22.5	
1600	41.3		54.9		22	
2000	40.5	45.1	52	57.5	19.4	25.4
2500	39		49.6		20.2	
3150	37.6		46.3		19.8	
4000	35.7	40.4	48.8	51.9	19.3	23.8
5000	31.4		45.6		17.8	
6300	29.3		48.3		17.7	
8000	27.4	32.3	46.9	52.7	18	23
10000	25		48.4		18.8	
12500	21.9		38.6		18.6	
16000	21.4	26.7	28	39.1	19.9	24.9
20000	22.4		24.5		21.5	

Ln Start Level:	15 dB	
L 2.00	62.7	dBA
L 8.00	56.1	dBA
L 25.00	51.2	dBA
L 50.00	47.5	dBA
L 90.00	43.1	dBA
L 95.00	42.2	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	6 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	15:50:25
Elapsed Time:		15:01.1	

	A Weight	C Weight	Flat
Leq:	52.7 dBA	60.1 dBC	60.9 dBF
SEL:	82.2 dBA	89.7 dBC	90.5 dBF
Peak:	95.1 dBA	93.2 dBC	93.6 dBF
		2/4/2026 16:01	2/4/2026 16:01 2/4/2026 16:01
Lmax (slow):	67.8 dBA	73.4 dBC	73.5 dBF
		2/4/2026 15:50	2/4/2026 15:50 2/4/2026 15:50
Lmin (slow):	40.3 dBA	53.0 dBC	54.4 dBF
		2/4/2026 15:54	2/4/2026 15:56 2/4/2026 15:56
Lmax (fast):	73.9 dBA	78.8 dBC	78.8 dBF
		2/4/2026 15:50	2/4/2026 15:50 2/4/2026 15:50
Lmin (fast):	38.4 dBA	51.2 dBC	52.8 dBF
		2/4/2026 15:54	2/4/2026 15:56 2/4/2026 15:58
Lmax (impulse):	76.2 dBA	81.0 dBC	80.9 dBF
		2/4/2026 15:50	2/4/2026 15:50 2/4/2026 15:50
Lmin (impulse):	40.8 dBA	53.5 dBC	54.9 dBF
		2/4/2026 15:54	2/4/2026 15:56 2/4/2026 15:56

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	16
History Records:	Enabled	Number History Records:	3606
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:47:16
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_004.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	17:12:41
Elapsed Time:		15:00.8	

	A Weight	C Weight	Flat
Leq:	63.7 dBA	75.9 dBC	76.6 dBF
SEL:	93.2 dBA	105.4 dBC	106.1 dBF
Peak:	88.4 dBA	91.0 dBC	91.6 dBF
		2/4/2026 17:22	2/4/2026 17:24 2/4/2026 17:23
Lmax (slow):	75.8 dBA	79.8 dBC	80.8 dBF
		2/4/2026 17:13	2/4/2026 17:24 2/4/2026 17:24
Lmin (slow):	62.3 dBA	72.7 dBC	73.1 dBF
		2/4/2026 17:19	2/4/2026 17:20 2/4/2026 17:20
Lmax (fast):	80.7 dBA	81.4 dBC	82.4 dBF
		2/4/2026 17:13	2/4/2026 17:24 2/4/2026 17:24
Lmin (fast):	61.6 dBA	70.3 dBC	70.6 dBF
		2/4/2026 17:19	2/4/2026 17:20 2/4/2026 17:20
Lmax (impulse):	81.2 dBA	81.9 dBC	82.9 dBF
		2/4/2026 17:13	2/4/2026 17:24 2/4/2026 17:24
Lmin (impulse):	62.0 dBA	71.8 dBC	72.3 dBF
		2/4/2026 17:19	2/4/2026 17:14 2/4/2026 17:14

Spectra

Start Time:		4-Feb-26	17:12:41	Run Time:	15:00.8	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	48.9		53.6		26.9	
16	47	52.1	54	57.6	31	35.1
20	45.4		49.9		31.7	
25	48.2		48.7		31.7	
31.5	54	68.8	58.9	71.6	38.9	48.4
40	68.6		71.3		47.8	
50	72.9		75.9		51.9	
63	53.7	73.5	59.4	76.5	42.8	55.7
80	63.8		67.2		52.9	
100	67.7		71.9		54.7	
125	62.6	69.4	65.2	73.2	51.3	58.6
160	60.3		62.7		54.8	
200	65.6		67.5		60.3	
250	61.1	67.2	62.6	69	54.1	61.7
315	54.9		57.3		51.4	
400	54.3		57.4		50.2	
500	50.7	57.3	50.3	59	46.7	53.1
630	51.6		51.5		47.2	
800	50.5		49		45.6	
1000	52.7	57.4	53	57.6	49.4	53.5
1250	54.1		54.7		50	
1600	51.6		51.4		46.8	
2000	51.3	55.9	52.5	56.4	46.6	51.2
2500	50.3		50.9		45.7	
3150	48.6		50.7		44.6	
4000	51.2	53.8	77.3	77.9	41.8	47.3
5000	45.4		69.1		39.7	
6300	42.6		43.4		37	
8000	40.9	45.6	50	51.2	34.6	39.6
10000	37.5		39.9		31.1	
12500	32.6		37.4		26.3	
16000	27.9	34.4	32.3	39	23.2	29.2
20000	24.8		28.5		23	

Ln Start Level:	15 dB	
L 2.00	66	dBA
L 8.00	64.2	dBA
L 25.00	63.6	dBA
L 50.00	63.3	dBA
L 90.00	62.8	dBA
L 95.00	62.6	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	1 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	17:12:41
Elapsed Time:		15:00.8	

	A Weight	C Weight	Flat
Leq:	63.7 dBA	75.9 dBC	76.6 dBF
SEL:	93.2 dBA	105.4 dBC	106.1 dBF
Peak:	88.4 dBA	91.0 dBC	91.6 dBF
		2/4/2026 17:22	2/4/2026 17:24 2/4/2026 17:23
Lmax (slow):	75.8 dBA	79.8 dBC	80.8 dBF
		2/4/2026 17:13	2/4/2026 17:24 2/4/2026 17:24
Lmin (slow):	62.3 dBA	72.7 dBC	73.1 dBF
		2/4/2026 17:19	2/4/2026 17:20 2/4/2026 17:20
Lmax (fast):	80.7 dBA	81.4 dBC	82.4 dBF
		2/4/2026 17:13	2/4/2026 17:24 2/4/2026 17:24
Lmin (fast):	61.6 dBA	70.3 dBC	70.6 dBF
		2/4/2026 17:19	2/4/2026 17:20 2/4/2026 17:20
Lmax (impulse):	81.2 dBA	81.9 dBC	82.9 dBF
		2/4/2026 17:13	2/4/2026 17:24 2/4/2026 17:24
Lmin (impulse):	62.0 dBA	71.8 dBC	72.3 dBF
		2/4/2026 17:19	2/4/2026 17:14 2/4/2026 17:14

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	16
History Records:	Enabled	Number History Records:	3605
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:47:28
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_005.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	17:31:23
Elapsed Time:		15:00.7	

	A Weight		C Weight		Flat	
Leq:	59.9 dBA		69.8 dBC		70.5 dBF	
SEL:	89.4 dBA		99.4 dBC		100.0 dBF	
Peak:	87.6 dBA		91.0 dBC		91.3 dBF	
		2/4/2026 17:36		2/4/2026 17:36		2/4/2026 17:36
Lmax (slow):	70.5 dBA		74.0 dBC		75.4 dBF	
		2/4/2026 17:36		2/4/2026 17:31		2/4/2026 17:31
Lmin (slow):	57.6 dBA		67.6 dBC		68.1 dBF	
		2/4/2026 17:38		2/4/2026 17:34		2/4/2026 17:34
Lmax (fast):	74.1 dBA		76.5 dBC		77.5 dBF	
		2/4/2026 17:36		2/4/2026 17:41		2/4/2026 17:41
Lmin (fast):	56.8 dBA		65.5 dBC		66.0 dBF	
		2/4/2026 17:33		2/4/2026 17:36		2/4/2026 17:36
Lmax (impulse):	74.9 dBA		79.7 dBC		80.7 dBF	
		2/4/2026 17:36		2/4/2026 17:41		2/4/2026 17:41
Lmin (impulse):	57.3 dBA		67.0 dBC		67.7 dBF	
		2/4/2026 17:33		2/4/2026 17:37		2/4/2026 17:37

Spectra

Start Time:		4-Feb-26	17:31:23	Run Time:	15:00.7	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct		Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5		47.7		52.4		30.9	
16		47.1	53.1	49.7	56.3	30.7	36
20		49.8		52		31.9	
25		51.4		52.5		35.7	
31.5		51.8	62.8	53.1	63.6	37.6	45.9
40		62.1		62.8		44.7	
50		65.3		66		49.5	
63		53.1	66	53.8	67.3	42.7	52
80		56.1		60.4		46.9	
100		58		63.5		47.3	
125		62.5	64.6	67.4	69.3	52.7	55.3
160		56.7		58.9		50.1	
200		59.8		62.3		54.4	
250		57.2	62.1	59.9	64.6	51.7	56.8
315		51.4		53.7		47.3	
400		51.5		54.9		47.5	
500		49.8	55.4	53.6	61.2	45.6	51.2
630		50.4		59		45.9	
800		49.4		54.2		44.4	
1000		49.8	54.1	48.8	55.9	43.6	48
1250		48.6		46.9		40.9	
1600		47.3		48.3		40	
2000		47.5	51.8	50.6	54.3	42.4	45.8
2500		46.3		49.5		40.3	
3150		43.9		53.1		38.9	
4000		47.5	49.4	69.6	69.8	36	41.2
5000		38.1		54.6		32	
6300		33.6		38.1		29.7	
8000		30.5	35.8	40.8	42.9	25.7	31.6
10000		25.7		30.6		21.7	
12500		21.9		26.4		19.4	
16000		21.3	26.7	23.2	29.6	20.1	25.3
20000		22.5		24.3		21.7	

Ln Start Level:	15 dB		
L 2.00		63.9	dBA
L 8.00		61.6	dBA
L 25.00		59.9	dBA
L 50.00		59	dBA
L 90.00		58.2	dBA
L 95.00		58.1	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	7 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	17:31:23
Elapsed Time:		15:00.7	

	A Weight		C Weight		Flat	
Leq:	59.9 dBA		69.8 dBC		70.5 dBF	
SEL:	89.4 dBA		99.4 dBC		100.0 dBF	
Peak:	87.6 dBA		91.0 dBC		91.3 dBF	
		2/4/2026 17:36		2/4/2026 17:36		2/4/2026 17:36
Lmax (slow):	70.5 dBA		74.0 dBC		75.4 dBF	
		2/4/2026 17:36		2/4/2026 17:31		2/4/2026 17:31
Lmin (slow):	57.6 dBA		67.6 dBC		68.1 dBF	
		2/4/2026 17:38		2/4/2026 17:34		2/4/2026 17:34
Lmax (fast):	74.1 dBA		76.5 dBC		77.5 dBF	
		2/4/2026 17:36		2/4/2026 17:41		2/4/2026 17:41
Lmin (fast):	56.8 dBA		65.5 dBC		66.0 dBF	
		2/4/2026 17:33		2/4/2026 17:36		2/4/2026 17:36
Lmax (impulse):	74.9 dBA		79.7 dBC		80.7 dBF	
		2/4/2026 17:36		2/4/2026 17:41		2/4/2026 17:41
Lmin (impulse):	57.3 dBA		67.0 dBC		67.7 dBF	
		2/4/2026 17:33		2/4/2026 17:37		2/4/2026 17:37

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	16
History Records:	Enabled	Number History Records:	3605
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:47:40
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_006.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	17:57:55
Elapsed Time:		20:01.1	

	A Weight	C Weight	Flat
Leq:	63.8 dBA	75.7 dBC	76.6 dBF
SEL:	94.6 dBA	106.5 dBC	107.4 dBF
Peak:	98.2 dBA	96.8 dBC	97.2 dBF
		2/4/2026 18:01	2/4/2026 18:04 2/4/2026 18:01
Lmax (slow):	79.0 dBA	80.5 dBC	80.9 dBF
		2/4/2026 18:01	2/4/2026 18:01 2/4/2026 18:05
Lmin (slow):	62.3 dBA	72.0 dBC	72.4 dBF
		2/4/2026 18:14	2/4/2026 18:09 2/4/2026 18:09
Lmax (fast):	81.4 dBA	82.0 dBC	82.5 dBF
		2/4/2026 18:01	2/4/2026 18:01 2/4/2026 18:08
Lmin (fast):	61.8 dBA	68.6 dBC	69.1 dBF
		2/4/2026 18:16	2/4/2026 18:11 2/4/2026 18:11
Lmax (impulse):	82.7 dBA	83.9 dBC	84.3 dBF
		2/4/2026 18:01	2/4/2026 18:04 2/4/2026 18:04
Lmin (impulse):	62.0 dBA	71.8 dBC	72.0 dBF
		2/4/2026 18:03	2/4/2026 18:03 2/4/2026 18:09

Spectra

Start Time:		4-Feb-26	17:57:55	Run Time:	20:01.1	
Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	45.6		52.9		29.4	
16	47.1	51.6	49.9	56.6	31.7	36.5
20	47.5		52.1		33.2	
25	49.5		56.3		33.6	
31.5	51.2	70.5	56.3	73.6	38.1	52
40	70.4		73.4		51.8	
50	73.3		76.5		55.2	
63	54.7	73.7	57.2	76.9	42.5	57.3
80	62.6		66.3		52.7	
100	64		67.3		54	
125	65.3	68.3	68.6	71.4	55.1	59.1
160	59.5		60.6		53.9	
200	60.5		62.4		54.4	
250	60.4	64.2	61.8	66	56	59.1
315	55.9		58.7		51.7	
400	56.3		65.9		51.6	
500	55.3	60.1	62.9	70.2	51.5	55.9
630	54.1		66.6		50.3	
800	55		75.4		50.1	
1000	54.4	59	75.7	79.1	49.9	54.3
1250	53		69.9		48.2	
1600	51.4		70		47.4	
2000	51.7	55.7	68.8	73.5	48.5	52.2
2500	49.2		66.6		46.2	
3150	47.9		60.5		44.9	
4000	47.9	51.4	58	63.2	42.3	47.5
5000	42		55.1		39.2	
6300	39.5		54.9		37	
8000	37	41.9	54.8	59.4	34.1	39.3
10000	32.4		54		29.8	
12500	27.3		44.9		24.5	
16000	23.3	29.8	40.1	46.5	21.7	27.7
20000	23.1		35.5		22.1	

Ln Start Level:	15 dB		
L 2.00		67.1	dBA
L 8.00		64.3	dBA
L 25.00		63.3	dBA
L 50.00		62.9	dBA
L 90.00		62.6	dBA
L 95.00		62.5	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	1 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:		3	
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	17:57:55
Elapsed Time:		20:01.1	

	A Weight	C Weight	Flat
Leq:	63.8 dBA	75.7 dBC	76.6 dBF
SEL:	94.6 dBA	106.5 dBC	107.4 dBF
Peak:	98.2 dBA	96.8 dBC	97.2 dBF
		2/4/2026 18:01	2/4/2026 18:04 2/4/2026 18:01
Lmax (slow):	79.0 dBA	80.5 dBC	80.9 dBF
		2/4/2026 18:01	2/4/2026 18:01 2/4/2026 18:05
Lmin (slow):	62.3 dBA	72.0 dBC	72.4 dBF
		2/4/2026 18:14	2/4/2026 18:09 2/4/2026 18:09
Lmax (fast):	81.4 dBA	82.0 dBC	82.5 dBF
		2/4/2026 18:01	2/4/2026 18:01 2/4/2026 18:08
Lmin (fast):	61.8 dBA	68.6 dBC	69.1 dBF
		2/4/2026 18:16	2/4/2026 18:11 2/4/2026 18:11
Lmax (impulse):	82.7 dBA	83.9 dBC	84.3 dBF
		2/4/2026 18:01	2/4/2026 18:04 2/4/2026 18:04
Lmin (impulse):	62.0 dBA	71.8 dBC	72.0 dBF
		2/4/2026 18:03	2/4/2026 18:03 2/4/2026 18:09

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	21
History Records:	Enabled	Number History Records:	4806
Run/Stop Records:		Number Run/Stop Records:	2

SLM & RTA Summary

Translated:		14-Aug-26	14:47:52
File Translated:	C:\Data\Projects\Rio Americano HS\Field\RioAmHS Reference Measurements\ST_007.slmdl		
Model Number:		824	
Serial Number:	A2624		
Firmware Rev:		4.29	
Software Version:		3.12	
Name:	AECOM		
Descr1:	2020 L St		
Descr2:	Sacramento, CA		
Setup:	SLM&RTA.ssa		
Setup Descr:	SLM & Real-Time Analyzer		
Location:			
Note 1:			
Note 2:			

Overall Any Data

Start Time:		4-Feb-26	18:42:47
Elapsed Time:		17:26.2	

	A Weight		C Weight		Flat	
Leq:	59.5 dBA		63.1 dBC		63.4 dBF	
SEL:	89.7 dBA		93.3 dBC		93.6 dBF	
Peak:	92.6 dBA		94.6 dBC		94.7 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmax (slow):	74.8 dBA		76.7 dBC		76.7 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmin (slow):	40.3 dBA		53.3 dBC		54.5 dBF	
		2/4/2026 18:54		2/4/2026 18:54		2/4/2026 18:54
Lmax (fast):	79.9 dBA		81.6 dBC		81.6 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmin (fast):	39.8 dBA		51.3 dBC		52.9 dBF	
		2/4/2026 18:54		2/4/2026 18:53		2/4/2026 18:53
Lmax (impulse):	82.8 dBA		84.5 dBC		84.5 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmin (impulse):	40.2 dBA		54.0 dBC		55.0 dBF	
		2/4/2026 18:54		2/4/2026 18:54		2/4/2026 18:54

Spectra

Start Time:		4-Feb-26	18:42:47	Run Time:	17:26.2

Freq Hz	Leq 1/3 Oct	Leq 1/1 Oct	Max 1/3 Oct	Max 1/1 Oct	Min 1/3 Oct	Min 1/1 Oct
12.5	45.6		50.6		25.3	
16	45.7	50.8	52.2	56.4	28.4	34.2
20	46.6		51.9		32.1	
25	47.2		53.6		30.4	
31.5	48.8	53.3	55.9	59.6	32.7	38.8
40	49.3		54.7		36.6	
50	49.9		54.5		37.2	
63	48.8	54	53.9	58.5	38.8	43.3
80	48.8		52.7		39.3	
100	49.9		56.6		37.6	
125	49.8	53.8	56.6	61.1	38.7	42.3
160	46.5		55.6		35.6	
200	44.4		54.7		34	
250	43.5	48.8	60.7	65.6	29.7	35.9
315	44.1		63.4		26.3	
400	51.3		65.7		26.4	
500	57.7	59.9	71	77.6	28.5	33.6
630	54.1		76.2		30.5	
800	53.5		74.4		30.7	
1000	48.9	55.7	71.2	77	28.9	33.8
1250	48.5		69.5		26.5	
1600	45.4		65.1		22.7	
2000	38.8	46.4	57.1	65.9	19.9	25.4
2500	32.1		52		17.9	
3150	29.6		49		16.3	
4000	28.9	34.2	47.7	53.5	16.3	21.2
5000	29.8		49.4		16.8	
6300	29.3		46.5		16.9	
8000	24.3	31.1	41.3	48.1	17.8	22.6
10000	22.5		37.7		18.7	
12500	20.8		33.2		18.7	
16000	21.2	26.7	28	34.8	20.1	25.1
20000	23.3		25		21.7	

Ln Start Level:	15 dB		
L 2.00		70.6	dBA
L 8.00		65.8	dBA
L 25.00		48.3	dBA
L 50.00		42.8	dBA
L 90.00		41.3	dBA
L 95.00		41	dBA

Detector:	Slow		
Weighting:	A		
SPL Exceedance Level 1:	65.0 dB	Exceeded:	25 times
SPL Exceedance level 2:	80 dB	Exceeded:	0 times
Peak-1 Exceedance Level:	100 dB	Exceeded:	0 times
Peak-2 Exceedance Level:	120 dB	Exceeded:	0 times
Hysteresis:	3		
Overloaded:	0 time(s)		
Paused:	0 times for 00:00:00.0		

Current Any Data

Start Time:		4-Feb-26	18:42:47
Elapsed Time:		17:26.2	

	A Weight		C Weight		Flat	
Leq:	59.5 dBA		63.1 dBC		63.4 dBF	
SEL:	89.7 dBA		93.3 dBC		93.6 dBF	
Peak:	92.6 dBA		94.6 dBC		94.7 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmax (slow):	74.8 dBA		76.7 dBC		76.7 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmin (slow):	40.3 dBA		53.3 dBC		54.5 dBF	
		2/4/2026 18:54		2/4/2026 18:54		2/4/2026 18:54
Lmax (fast):	79.9 dBA		81.6 dBC		81.6 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmin (fast):	39.8 dBA		51.3 dBC		52.9 dBF	
		2/4/2026 18:54		2/4/2026 18:53		2/4/2026 18:53
Lmax (impulse):	82.8 dBA		84.5 dBC		84.5 dBF	
		2/4/2026 18:48		2/4/2026 18:48		2/4/2026 18:48
Lmin (impulse):	40.2 dBA		54.0 dBC		55.0 dBF	
		2/4/2026 18:54		2/4/2026 18:54		2/4/2026 18:54

Calibrated:		1/1/2000 2:45	Offset: -46.3 dB
Checked:		2/4/2026 19:03	Level: 113.8 dB
Calibrator		597860	Level: 114.0 dB
Cal Records Count:		0	

Interval Records:	Enabled	Number Interval Records:	19
History Records:	Enabled	Number History Records:	4187
Run/Stop Records:		Number Run/Stop Records:	2

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Ldn
Traffic Desc. (Peak or ADT) : ADT

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			5593	45	30	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			5600	45	30	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			4539	45	30	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6004	45	30	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5847	45	30	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5527	45	30	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6240	45	30	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5988	45	30	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			6093	45	30	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6104	45	30	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5989	45	30	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5610	45	30	95	2	3	85	0	15	

0

Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Ldn

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Ldn Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			66.8	58.3	64.6	69.2	0.02	25	79	2500	249981
2	American River Drive betw			66.8	58.3	64.6	69.2	0.03	25	79	2503	250294
3	Saverien Drive between Fa			65.9	57.4	63.6	68.3	0.02	20	64	2029	202872
#######	American River Drive betw			67.1	58.6	64.9	69.5	0.03	27	85	2684	268351
#######	American River Drive betw			67.0	58.5	64.7	69.4	0.03	26	83	2613	261334
#######	Saverien Drive between Fa			66.8	58.2	64.5	69.2	0.02	25	78	2470	247031
#######	American River Drive betw			67.3	58.8	65.0	69.7	0.03	28	88	2789	278899
#######	American River Drive betw			67.1	58.6	64.9	69.5	0.03	27	85	2676	267636
#######	Saverien Drive between Fa			67.2	58.7	64.9	69.6	0.03	27	86	2723	272329
#######	American River Drive betw			67.2	58.7	64.9	69.6	0.03	27	86	2728	272820
#######	American River Drive betw			67.1	58.6	64.9	69.5	0.03	27	85	2677	267680
#######	Saverien Drive between Fa			66.8	58.3	64.6	69.2	0.03	25	79	2507	250741

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Leq
Traffic Desc. (Peak or ADT) : Peak

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			710	45	30	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			703	45	30	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			810	45	30	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			753	45	30	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			755	45	30	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1645	45	30	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			405	45	30	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			383	45	30	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1012	45	30	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			803	45	30	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			817	45	30	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1349	45	30	95	2	3	85	0	15	

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Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Leq

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Leq Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			67.9	59.4	65.7	70.3	0.03	32	102	3241	324089
2	American River Drive betw			67.9	59.4	65.6	70.3	0.03	32	101	3209	320893
3	Saverien Drive between Fa			68.5	60.0	66.3	70.9	0.04	37	117	3697	369735
#######	American River Drive betw			68.2	59.7	65.9	70.6	0.03	34	109	3437	343716
#######	American River Drive betw			68.2	59.7	65.9	70.6	0.03	34	109	3446	344629
#######	Saverien Drive between Fa			71.6	63.1	69.3	74.0	0.08	75	237	7509	750881
#######	American River Drive betw			65.5	57.0	63.2	67.9	0.02	18	58	1849	184867
#######	American River Drive betw			65.3	56.7	63.0	67.7	0.02	17	55	1748	174825
#######	Saverien Drive between Fa			69.5	61.0	67.2	71.9	0.05	46	146	4619	461940
#######	American River Drive betw			68.5	60.0	66.2	70.9	0.04	37	116	3665	366540
#######	American River Drive betw			68.6	60.0	66.3	70.9	0.04	37	118	3729	372930
#######	Saverien Drive between Fa			70.7	62.2	68.5	73.1	0.06	62	195	6158	615768

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Ldn
Traffic Desc. (Peak or ADT) : ADT

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			5593	45	50	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			5600	45	50	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			4539	45	50	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6004	45	50	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5847	45	50	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5527	45	50	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6240	45	50	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5988	45	50	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			6093	45	50	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6104	45	50	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5989	45	50	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5610	45	50	95	2	3	85	0	15	

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Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Ldn

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Ldn Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			64.6	56.1	62.3	67.0	0.02	25	79	2500	249981
2	American River Drive betw			64.6	56.1	62.3	67.0	0.03	25	79	2503	250294
3	Saverien Drive between Fa			63.7	55.2	61.4	66.1	0.02	20	64	2029	202872
#######	American River Drive betw			64.9	56.4	62.6	67.3	0.03	27	85	2684	268351
#######	American River Drive betw			64.8	56.3	62.5	67.2	0.03	26	83	2613	261334
#######	Saverien Drive between Fa			64.5	56.0	62.3	66.9	0.02	25	78	2470	247031
#######	American River Drive betw			65.1	56.6	62.8	67.5	0.03	28	88	2789	278899
#######	American River Drive betw			64.9	56.4	62.6	67.3	0.03	27	85	2676	267636
#######	Saverien Drive between Fa			65.0	56.5	62.7	67.4	0.03	27	86	2723	272329
#######	American River Drive betw			65.0	56.5	62.7	67.4	0.03	27	86	2728	272820
#######	American River Drive betw			64.9	56.4	62.6	67.3	0.03	27	85	2677	267680
#######	Saverien Drive between Fa			64.6	56.1	62.4	67.0	0.03	25	79	2507	250741

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Leq
Traffic Desc. (Peak or ADT) : Peak

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			710	45	50	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			703	45	50	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			810	45	50	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			753	45	50	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			755	45	50	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1645	45	50	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			405	45	50	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			383	45	50	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1012	45	50	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			803	45	50	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			817	45	50	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1349	45	50	95	2	3	85	0	15	

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Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Leq

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Leq Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			65.7	57.2	63.5	68.1	0.03	32	102	3241	324089
2	American River Drive betw			65.7	57.2	63.4	68.1	0.03	32	101	3209	320893
3	Saverien Drive between Fa			66.3	57.8	64.0	68.7	0.04	37	117	3697	369735
#######	American River Drive betw			66.0	57.5	63.7	68.4	0.03	34	109	3437	343716
#######	American River Drive betw			66.0	57.5	63.7	68.4	0.03	34	109	3446	344629
#######	Saverien Drive between Fa			69.4	60.9	67.1	71.8	0.08	75	237	7509	750881
#######	American River Drive betw			63.3	54.8	61.0	65.7	0.02	18	58	1849	184867
#######	American River Drive betw			63.0	54.5	60.8	65.4	0.02	17	55	1748	174825
#######	Saverien Drive between Fa			67.3	58.7	65.0	69.7	0.05	46	146	4619	461940
#######	American River Drive betw			66.3	57.7	64.0	68.7	0.04	37	116	3665	366540
#######	American River Drive betw			66.3	57.8	64.1	68.7	0.04	37	118	3729	372930
#######	Saverien Drive between Fa			68.5	60.0	66.3	70.9	0.06	62	195	6158	615768

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Ldn
Traffic Desc. (Peak or ADT) : ADT

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			5593	45	70	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			5600	45	70	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			4539	45	70	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6004	45	70	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5847	45	70	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5527	45	70	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6240	45	70	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5988	45	70	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			6093	45	70	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6104	45	70	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5989	45	70	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5610	45	70	95	2	3	85	0	15	

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Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Ldn

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Ldn Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			63.1	54.6	60.9	65.5	0.02	25	79	2500	249981
2	American River Drive betw			63.1	54.6	60.9	65.5	0.03	25	79	2503	250294
3	Saverien Drive between Fa			62.2	53.7	60.0	64.6	0.02	20	64	2029	202872
#######	American River Drive betw			63.4	54.9	61.2	65.8	0.03	27	85	2684	268351
#######	American River Drive betw			63.3	54.8	61.1	65.7	0.03	26	83	2613	261334
#######	Saverien Drive between Fa			63.1	54.6	60.8	65.5	0.02	25	78	2470	247031
#######	American River Drive betw			63.6	55.1	61.4	66.0	0.03	28	88	2789	278899
#######	American River Drive betw			63.4	54.9	61.2	65.8	0.03	27	85	2676	267636
#######	Saverien Drive between Fa			63.5	55.0	61.2	65.9	0.03	27	86	2723	272329
#######	American River Drive betw			63.5	55.0	61.3	65.9	0.03	27	86	2728	272820
#######	American River Drive betw			63.4	54.9	61.2	65.8	0.03	27	85	2677	267680
#######	Saverien Drive between Fa			63.1	54.6	60.9	65.5	0.03	25	79	2507	250741

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Leq
Traffic Desc. (Peak or ADT) : Peak

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			710	45	70	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			703	45	70	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			810	45	70	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			753	45	70	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			755	45	70	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1645	45	70	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			405	45	70	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			383	45	70	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1012	45	70	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			803	45	70	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			817	45	70	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1349	45	70	95	2	3	85	0	15	

0

Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Leq

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Leq Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			64.3	55.7	62.0	66.7	0.03	32	102	3241	324089
2	American River Drive betw			64.2	55.7	62.0	66.6	0.03	32	101	3209	320893
3	Saverien Drive between Fa			64.8	56.3	62.6	67.2	0.04	37	117	3697	369735
#######	American River Drive betw			64.5	56.0	62.3	66.9	0.03	34	109	3437	343716
#######	American River Drive betw			64.5	56.0	62.3	66.9	0.03	34	109	3446	344629
#######	Saverien Drive between Fa			67.9	59.4	65.7	70.3	0.08	75	237	7509	750881
#######	American River Drive betw			61.8	53.3	59.6	64.2	0.02	18	58	1849	184867
#######	American River Drive betw			61.6	53.1	59.3	64.0	0.02	17	55	1748	174825
#######	Saverien Drive between Fa			65.8	57.3	63.5	68.2	0.05	46	146	4619	461940
#######	American River Drive betw			64.8	56.3	62.5	67.2	0.04	37	116	3665	366540
#######	American River Drive betw			64.9	56.4	62.6	67.3	0.04	37	118	3729	372930
#######	Saverien Drive between Fa			67.0	58.5	64.8	69.4	0.06	62	195	6158	615768

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Ldn
Traffic Desc. (Peak or ADT) : ADT

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			5593	45	100	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			5600	45	100	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			4539	45	100	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6004	45	100	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5847	45	100	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5527	45	100	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6240	45	100	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5988	45	100	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			6093	45	100	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			6104	45	100	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			5989	45	100	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			5610	45	100	95	2	3	85	0	15	

0

Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Ldn

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Ldn Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			61.6	53.1	59.3	64.0	0.02	25	79	2500	249981
2	American River Drive betw			61.6	53.1	59.3	64.0	0.03	25	79	2503	250294
3	Saverien Drive between Fa			60.7	52.2	58.4	63.1	0.02	20	64	2029	202872
#######	American River Drive betw			61.9	53.4	59.6	64.3	0.03	27	85	2684	268351
#######	American River Drive betw			61.8	53.3	59.5	64.2	0.03	26	83	2613	261334
#######	Saverien Drive between Fa			61.5	53.0	59.3	63.9	0.02	25	78	2470	247031
#######	American River Drive betw			62.1	53.5	59.8	64.5	0.03	28	88	2789	278899
#######	American River Drive betw			61.9	53.4	59.6	64.3	0.03	27	85	2676	267636
#######	Saverien Drive between Fa			62.0	53.4	59.7	64.4	0.03	27	86	2723	272329
#######	American River Drive betw			62.0	53.4	59.7	64.4	0.03	27	86	2728	272820
#######	American River Drive betw			61.9	53.4	59.6	64.3	0.03	27	85	2677	267680
#######	Saverien Drive between Fa			61.6	53.1	59.3	64.0	0.03	25	79	2507	250741

Traffic Noise Prediction Model, (FHWA RD-77-108)

Model Input Sheet

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Ground Type : Hard
K Factor : NA
Metric (L_{eq}, L_{dn}, CNEL) : Leq
Traffic Desc. (Peak or ADT) : Peak

Segment	Roadway	Segment From	Segment To	Traffic Vol.	Speed (Mph)	Distance to CL	% Autos	%MT	% HT	Day %	Eve %	Night %	Offset (dB)
1	American River Drive between Morris Way and Saverien Drive			710	45	100	95	2	3	85	0	15	
2	American River Drive between Saverien Drive and Wixford Way			703	45	100	95	2	3	85	0	15	
3	Saverien Drive between Fair Oaks Boulevard and American Riv			810	45	100	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			753	45	100	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			755	45	100	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1645	45	100	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			405	45	100	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			383	45	100	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1012	45	100	95	2	3	85	0	15	
#######	American River Drive between Morris Way and Saverien Drive			803	45	100	95	2	3	85	0	15	
#######	American River Drive between Saverien Drive and Wixford Way			817	45	100	95	2	3	85	0	15	
#######	Saverien Drive between Fair Oaks Boulevard and American Riv			1349	45	100	95	2	3	85	0	15	

0

Traffic Noise Prediction Model, (FHWA RD-77-108)

Predicted Noise Levels

AECOM

Project Name : 60747601 - Rio Americano High School EIR
Project Number : 60747601
Modeling Condition : Existing
Metric (Leq, Ldn, CNEL) : Leq

Segment	Roadway	Segment From	Segment To	Noise Levels, dB Leq Auto	MT	HT	Total	Distance to Traffic Noise Contours, Feet 100 dB	70 dB	65 dB	50 dB	30 dB
1	American River Drive betw			62.7	54.2	60.5	65.1	0.03	32	102	3241	324089
2	American River Drive betw			62.7	54.2	60.4	65.1	0.03	32	101	3209	320893
3	Saverien Drive between Fa			63.3	54.8	61.0	65.7	0.04	37	117	3697	369735
#######	American River Drive betw			63.0	54.5	60.7	65.4	0.03	34	109	3437	343716
#######	American River Drive betw			63.0	54.5	60.7	65.4	0.03	34	109	3446	344629
#######	Saverien Drive between Fa			66.4	57.8	64.1	68.8	0.08	75	237	7509	750881
#######	American River Drive betw			60.3	51.8	58.0	62.7	0.02	18	58	1849	184867
#######	American River Drive betw			60.0	51.5	57.8	62.4	0.02	17	55	1748	174825
#######	Saverien Drive between Fa			64.3	55.7	62.0	66.6	0.05	46	146	4619	461940
#######	American River Drive betw			63.2	54.7	61.0	65.6	0.04	37	116	3665	366540
#######	American River Drive betw			63.3	54.8	61.1	65.7	0.04	37	118	3729	372930
#######	Saverien Drive between Fa			65.5	57.0	63.2	67.9	0.06	62	195	6158	615768

ATTACHMENT E

Air Quality and Greenhouse Gas Data and Calculations
(DEIR Appendix G)

Rio Americano High School Stadium Improvements Project

Construction Criteria Pollutant Emissions

Description	ROG	NOX	PM10	PM2.5	PM10	PM2.5
	lb/day				ton/year	
Construction Equipment and Vehicles	3.24	28.57	2.02	1.18	0.03	0.02

Operational Criteria Pollutant Emissions

Description	ROG	NOX	PM10	PM2.5	PM10	PM2.5
	lb/day				ton/year	
Operations (Mobile)	9.8	8.2	13.6	3.5	0.02	0.005

Construction GHG Emissions

Year	MT CO2e
2027	102.5

Operational GHG Emissions

Emissions Source	MT CO2e per year
Mobile	18
Energy	2
Refrigerants	7.76E-05
Total	**20.27**

CalEEMod Assumptions and Inputs

Project Name	Rio Americano High School Improvements Project
Project Location	Sacramento County
Land Use Setting	Suburban
Construction Start Date	6/1/2027
Construction Workdays	5 days per week
Operational Year	2028
Utility	SMUD (electric), PG&E (natural gas)

4 month duration

Land Use

Project Component	CalEEMod Land Use Type	Total Area (sf)	Acres	Building Square Footage	Notes
Stadium Lighting	User Defined Recreational	12957.2	0.30	0	Includes 2900 sf area for pathway egress lighting, disturbance areas for lights shown below, and hardscape/softscape disturbed for bleachers
Press Box	Educational (High School)	0.3	0.01	300	Duplicates Mesa Verde design, measured in google earth

Light installation area calculation

Taller lights (80-100' tall)

Disturbance area per light (sf)	28	14 sf hardscape and 14 sf softscape
Total disturbance area (sf)	112	based on 4 lights

Shorter lights (15' tall)

Assumed disturbance area (sf) per light	4.2	Assumes scales based on height compared to taller lights (assuming 100' for taller lights)
Total disturbance area (sf)	25.2	based on 6 lights

Construction Schedule and Equipment

Phase Name	CalEEMod Phase Type	Weeks	Equipment	Equipment Type	Quantity	Hrs/Day	Start	End	Workers	Notes
Structure Removal	Demolition	1	*Haul Truck Trips*	N/A	*N/A*	*N/A*	6/1/2027	6/1/2027	*N/A*	No equipment use
Egress Pathway Excavation and Light Installation	Building Construction	2	CalEEMod Defaults for demolition	Concrete/Industrial Saws	1	8	6/1/2027	6/15/2027	CalEEMod Default	Duration and equipment based on CalEEMod defaults
				Rubber Tired Dozers	1	1				
				Tractors/Loaders/Backhoes	2	6				
			Equipment for light installation	Cranes	1	8				
				Forklift	1	8				
Stadium Lights Installation	Building Construction	1	Crane	Cranes	1	8	6/1/2027	6/8/2027	20	Schedule based on project inputs. Equipment based on Jesuit Stadium project
			Auger	Bore/Drill Rigs	1	8				
			Backhoe	Tractor/Loaders/Backhoes	1	8				
			Forklift	Forklifts	1	8				
Bleacher Installation and Press Box Construction	Building Construction	12	CalEEMod defaults	Cranes	1	4	6/1/2027	8/24/2027	CalEEMod Default	
				Forklifts	2	6				
				Generator Sets	1	8				Assumes powers hand tools
				Tractor/Loaders/Backhoes	2	8				
				Welders	6	8				
Egress Pathway Repaving	Paving	1	CalEEMod defaults	Pavers	1	7	6/16/2027	6/21/2027	CalEEMod Default	Assume overlaps with last 2 weeks of bleach installation and press box construction. Duration based on CalEEMod defaults
				Rollers	1	7				
				Cement and Mortar Mixers	4	6				
				Tractors/Loaders/Backhoes	1	7				

Notes:

1. Assume no architectural coating phase
2. Conservatively assumes all construction activities start at same time and overlap, with exception of egress pathway paving occuring following completion of excavation and lighting installation

Material Quantities

Phase	Material	Quantity	Units	Notes
Egress Pathway Excavation and Light Installation	Excavated material (export)	39	cubic yards	Based on 2900 feet disturbance area. 900 feet of disturbance for lights excavated to 2.4' depth as shown below, and remaining 2000 ft assumed to be excavated to 6" to remove asphalt. Trenched material is assumed to be reused in place
Stadium Light Installation	Excavated material (export)	66	cubic yards	

Material excavation quantity calculation

Taller lights (80-100' tall)

Total disturbance area for taller lights (sf) =	112	based on 4 lights, calculated above
Assumed excavation depth (ft) =	16	
Excavated material for taller lights (cy) =	66	based on 4 lights

Shorter lights (15' tall)

Total disturbance area for shorter lights (sf) =	25.2	based on 6 lights, calculated above
Assumed excavation depth (ft) =	2.4	Assumes scales based on height compared to taller lights (assuming 100' for taller lights)
Excavated material for taller lights (cy) =	2	based on 6 lights

Construction Vehicle Trips

Phase	Worker Trips (one-way trips/day)	Vendor Trips (one-way trips/day)	Haul Truck Trips (one-way trips/day)	Notes
Structure Removal	0	0	8	Assumes 1 trip per storage shed (3 sheds) and 1 trip for removed SMUD poles
Egress Pathway Excavation and Light Installation	15	2	1	Worker trips assume 2.5 one-way trips per piece of equipment, consistent with CalEEMod User Guide. Assume 1 vendor round trip per day for delivery of lights. Haul truck trips based on excavated material quantity and rounded up to nearest whole number
Stadium Light Installation	Assume included below	2	2	Assume 1 vendor trip per day. Haul truck trips based on exported material quantity.
Bleacher and Press Box Installation	40	2	0	Assume 1 vendor trip per day
Paving	Default (17.5)	0	0	

Paved Area

Egress Pathway	0.06	acres

Assumes 2900 sf area is repaved.

Operational Trips

	Daily One-Way Trips	Miles per Trip	Daily VMT	Annual One-Way Trips	Annual VMT
Event Attendance	2590	7.34	19013	6826	50109

Notes:

1. Daily one-way trips based on 1,295 vehicles estimated for "Conservative Event" per Local Transportation Analysis completed for project (Appendix E). Two one-way trips per round trip.

2. Miles per trip based on weighted average of estimated distances for home vs away attendees (per the VMT Study - Appendix F) and the estimated split of home vs away attendees for a "General Event" game (per the LTA Study - Appendix E).

	Attendees	Mi/Trip
Home	1700	5
Visitor	500	15.3
Weighted Average		**7.34**

3. Annual one-way trips based on the below event types and associated trip generation.

Event Type	Number of Events	Number of Vehicles	Number of One-Way Trips
Peak Event (4 football games + graduation)	5	1295	2590
Average Football Game	5	823	1646
School Assembly	4	1295	2590
			6826

4. Conservatively assumes default CalEEMod fleet mix, which captures busses and other vehicle types and conservatively estimates emissions given most trips would be by passenger vehicles.

Electricity Consumption

Project Component	Annual Electricity Use (kWh)	Notes
Press Box	2287.06	CalEEMod default
Lighting	11350.33	Based on CalEEMod defaults for parking lot of same area of disturbance as proposed project
Educational (High School)	13637.39	Total estimated electricity consumption included under "High School" land use because User Defined Recreational doesn't allow for determining what portion of electricity is subject to Title 24 standards or not

Assumes 0 water consumption, 0 waste generation, and updated default refrigerants to only include commerical A/C for press box.

Rio Americano High School Improvements Project Detailed Report

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1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Rio Americano High School Improvements Project
Construction Start Date	6/1/2027
Operational Year	2028
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	2.70000
Precipitation (days)	35.4000
Location	38.57865753855586, -121.35535623789534
County	Sacramento
City	Unincorporated
Air District	Sacramento Metropolitan AQMD
Air Basin	Sacramento Valley
TAZ	649
EDFZ	13
Electric Utility	Sacramento Municipal Utility District
Gas Utility	Pacific Gas & Electric

Data Field	Value
App Version	2022.1.1.45

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
High School	0.30000	1000sqft	0.00689	300.000	0.00000	0.00000	—	—
User Defined Recreational	1.000000	User Defined Unit	0.30000	0.00000	0.00000	—	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3.92328	3.24404	28.5717	38.7920	0.07194	0.88585	1.12975	2.01560	0.81635	0.36255	1.17890	—	8,009.53	8,009.53	0.34921	0.22192	3.84516	8,088.24
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Unmit.	0.37615	0.31336	2.53155	3.57678	0.00586	0.07427	0.08459	0.15886	0.06835	0.02240	0.09075	—	615.715	615.715	0.02382	0.00956	0.12806	619.289
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06865	0.05719	0.46201	0.65276	0.00107	0.01355	0.01544	0.02899	0.01247	0.00409	0.01656	—	101.939	101.939	0.00394	0.00158	0.02120	102.530

2.2. Construction Emissions by Year

2.2.1. Total Construction Emissions by Year, Unmitigated

Includes both onsite and offsite emissions.

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.92328	3.24404	28.5717	38.7920	0.07194	0.88585	1.12975	2.01560	0.81635	0.36255	1.17890	—	8,009.53	8,009.53	0.34921	0.22192	3.84516	8,088.24
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.37615	0.31336	2.53155	3.57678	0.00586	0.07427	0.08459	0.15886	0.06835	0.02240	0.09075	—	615.715	615.715	0.02382	0.00956	0.12806	619.289
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.06865	0.05719	0.46201	0.65276	0.00107	0.01355	0.01544	0.02899	0.01247	0.00409	0.01656	—	101.939	101.939	0.00394	0.00158	0.02120	102.530

2.2.2. Onsite Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	3.59881	3.00364	26.8386	35.2268	0.06569	0.86873	0.31981	1.18854	0.79923	0.16422	0.96345	—	6,463.81	6,463.81	0.26220	0.05244	0.00000	6,485.99
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.34858	0.28997	2.48111	3.27790	0.00574	0.07400	0.00876	0.08276	0.06808	0.00450	0.07258	—	526.915	526.915	0.02137	0.00427	0.00000	528.723
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.06362	0.05292	0.45280	0.59822	0.00105	0.01351	0.00160	0.01510	0.01243	0.00082	0.01325	—	87.2368	87.2368	0.00354	0.00071	0.00000	87.5362

2.2.3. Offsite Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.32447	0.24040	1.73302	3.56521	0.00626	0.01712	0.80994	0.82706	0.01712	0.19832	0.21545	—	1,545.72	1,545.72	0.08701	0.16948	3.84516	1,602.25
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.02757	0.02339	0.05044	0.29888	0.00012	0.00026	0.07583	0.07610	0.00026	0.01790	0.01817	—	88.7999	88.7999	0.00245	0.00529	0.12806	90.5652

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2027	0.00503	0.00427	0.00920	0.05455	0.00002	0.00005	0.01384	0.01389	0.00005	0.00327	0.00332	—	14.7018	14.7018	0.00040	0.00088	0.02120	14.9941

2.3. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10.5278	9.82322	6.97220	71.2125	0.15497	0.10830	13.4867	13.5950	0.10153	3.42587	3.52740	0.00000	15,850.5	15,850.5	0.72627	0.67591	45.1266	16,115.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	9.51440	8.76257	8.16825	62.6179	0.14160	0.10850	13.4867	13.5952	0.10172	3.42587	3.52759	0.00000	14,497.8	14,497.8	0.83923	0.74155	1.17053	14,740.9
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.06877	0.06356	0.05513	0.43901	0.00104	0.00078	0.09518	0.09596	0.00073	0.02419	0.02492	0.00000	120.598	120.598	0.00609	0.00518	0.14116	122.434
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.01255	0.01160	0.01006	0.08012	0.00019	0.00014	0.01737	0.01751	0.00013	0.00441	0.00455	0.00000	19.9664	19.9664	0.00101	0.00086	0.02337	20.2704

2.4. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	10.5278	9.82322	6.97220	71.2125	0.15497	0.10830	13.4867	13.5950	0.10153	3.42587	3.52740	—	15,836.5	15,836.5	0.72578	0.67584	45.1262	16,101.1
Area	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Total	10.5278	9.82322	6.97220	71.2125	0.15497	0.10830	13.4867	13.5950	0.10153	3.42587	3.52740	0.00000	15,850.5	15,850.5	0.72627	0.67591	45.1266	16,115.2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	9.51440	8.76257	8.16825	62.6179	0.14160	0.10850	13.4867	13.5952	0.10172	3.42587	3.52759	—	14,483.8	14,483.8	0.83875	0.74148	1.17007	14,726.9
Area	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Total	9.51440	8.76257	8.16825	62.6179	0.14160	0.10850	13.4867	13.5952	0.10172	3.42587	3.52759	0.00000	14,497.8	14,497.8	0.83923	0.74155	1.17053	14,740.9
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.06877	0.06356	0.05513	0.43901	0.00104	0.00078	0.09518	0.09596	0.00073	0.02419	0.02492	—	106.593	106.593	0.00561	0.00511	0.14069	108.398
Area	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Total	0.06877	0.06356	0.05513	0.43901	0.00104	0.00078	0.09518	0.09596	0.00073	0.02419	0.02492	0.00000	120.598	120.598	0.00609	0.00518	0.14116	122.434
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.01255	0.01160	0.01006	0.08012	0.00019	0.00014	0.01737	0.01751	0.00013	0.00441	0.00455	—	17.6477	17.6477	0.00093	0.00085	0.02329	17.9465
Area	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	2.31869	2.31869	0.00008	0.00001	—	2.32382
Water	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Waste	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00008	0.00008
Total	0.01255	0.01160	0.01006	0.08012	0.00019	0.00014	0.01737	0.01751	0.00013	0.00441	0.00455	0.00000	19.9664	19.9664	0.00101	0.00086	0.02337	20.2704

3. Construction Emissions Details

3.1. Structure Removal (2027)

3.1.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Demolition	—	—	—	—	—	—	0.00000	0.00000	—	0.00000	0.00000	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.1.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.06561	0.01552	0.95822	0.39154	0.00370	0.01076	0.15185	0.16261	0.01076	0.04061	0.05137	—	566.090	566.090	0.04974	0.09030	1.08450	595.328
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00018	0.00004	0.00277	0.00108	0.00001	0.00003	0.00041	0.00044	0.00003	0.00011	0.00014	—	1.55087	1.55087	0.00014	0.00025	0.00128	1.62928
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00003	0.00001	0.00051	0.00020	< 0.000005	0.00001	0.00007	0.00008	0.00001	0.00002	0.00003	—	0.25676	0.25676	0.00002	0.00004	0.00021	0.26975

3.2. Egress Pathway Excavation and Light Installation (2027)

3.2.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	1.01928	0.85370	7.84687	9.63895	0.01932	0.28011	—	0.28011	0.25771	—	0.25771	—	1,994.39	1,994.39	0.08090	0.01618	—	2,001.23
Dust From Material Movement	—	—	—	—	—	—	0.31952	0.31952	—	0.16418	0.16418	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02793	0.02339	0.21498	0.26408	0.00053	0.00767	—	0.00767	0.00706	—	0.00706	—	54.6408	54.6408	0.00222	0.00044	—	54.8283
Dust From Material Movement	—	—	—	—	—	—	0.00875	0.00875	—	0.00450	0.00450	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00510	0.00427	0.03923	0.04819	0.00010	0.00140	—	0.00140	0.00129	—	0.00129	—	9.04640	9.04640	0.00037	0.00007	—	9.07745

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Dust From Material Movement	—	—	—	—	—	—	0.00160	0.00160	—	0.00082	0.00082	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.2.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.05906	0.05807	0.03796	0.79591	0.00000	0.00000	0.15155	0.15155	0.00000	0.03552	0.03552	—	163.956	163.956	0.00231	0.00572	0.54166	166.261
Vendor	0.00590	0.00205	0.09209	0.03616	0.00039	0.00078	0.01515	0.01593	0.00078	0.00408	0.00485	—	55.3911	55.3911	0.00338	0.00811	0.12262	58.0158
Hauling	0.00820	0.00194	0.11978	0.04894	0.00046	0.00134	0.01898	0.02033	0.00134	0.00508	0.00642	—	70.7612	70.7612	0.00622	0.01129	0.13556	74.4160
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00146	0.00130	0.00119	0.01636	0.00000	0.00000	0.00406	0.00406	0.00000	0.00095	0.00095	—	4.09428	4.09428	0.00007	0.00016	0.00641	4.14921
Vendor	0.00016	0.00005	0.00265	0.00099	0.00001	0.00002	0.00041	0.00043	0.00002	0.00011	0.00013	—	1.51743	1.51743	0.00009	0.00022	0.00145	1.58743
Hauling	0.00022	0.00005	0.00347	0.00135	0.00001	0.00004	0.00051	0.00055	0.00004	0.00014	0.00017	—	1.93859	1.93859	0.00017	0.00031	0.00160	2.03660
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00027	0.00024	0.00022	0.00299	0.00000	0.00000	0.00074	0.00074	0.00000	0.00017	0.00017	—	0.67786	0.67786	0.00001	0.00003	0.00106	0.68695

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Vendor	0.00003	0.00001	0.00048	0.00018	< 0.00005	< 0.00005	0.00007	0.00008	< 0.00005	0.00002	0.00002	—	0.25123	0.25123	0.00002	0.00004	0.00024	0.26282
Hauling	0.00004	0.00001	0.00063	0.00025	< 0.00005	0.00001	0.00009	0.00010	0.00001	0.00002	0.00003	—	0.32095	0.32095	0.00003	0.00005	0.00027	0.33718

3.3. Light Installation (2027)

3.3.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.74120	0.62281	6.05689	8.39587	0.01678	0.21720	—	0.21720	0.19982	—	0.19982	—	1,816.37	1,816.37	0.07368	0.01474	—	1,822.60
Dust From Material Movement	—	—	—	—	—	—	0.00030	0.00030	—	0.00005	0.00005	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	0.01015	0.00853	0.08297	0.11501	0.00023	0.00298	—	0.00298	0.00274	—	0.00274	—	24.8818	24.8818	0.00101	0.00020	—	24.9672
Dust From Material Movement	—	—	—	—	—	—	< 0.000005	< 0.000005	—	< 0.000005	< 0.000005	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00185	0.00156	0.01514	0.02099	0.00004	0.00054	—	0.00054	0.00050	—	0.00050	—	4.11946	4.11946	0.00017	0.00003	—	4.13360
Dust From Material Movement	—	—	—	—	—	—	< 0.000005	< 0.000005	—	< 0.000005	< 0.000005	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.3.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00590	0.00205	0.09209	0.03616	0.00039	0.00078	0.01515	0.01593	0.00078	0.00408	0.00485	—	55.3911	55.3911	0.00338	0.00811	0.12262	58.0158

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Hauling	0.01640	0.00388	0.23955	0.09789	0.00093	0.00269	0.03796	0.04065	0.00269	0.01015	0.01284	—	141.522	141.522	0.01243	0.02258	0.27112	148.832
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00008	0.00003	0.00132	0.00050	0.00001	0.00001	0.00020	0.00021	0.00001	0.00005	0.00007	—	0.75871	0.75871	0.00005	0.00011	0.00072	0.79371
Hauling	0.00022	0.00005	0.00347	0.00135	0.00001	0.00004	0.00051	0.00055	0.00004	0.00014	0.00017	—	1.93859	1.93859	0.00017	0.00031	0.00160	2.03660
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Vendor	0.00001	0.00001	0.00024	0.00009	< 0.000005	< 0.000005	0.00004	0.00004	< 0.000005	0.00001	0.00001	—	0.12561	0.12561	0.00001	0.00002	0.00012	0.13141
Hauling	0.00004	0.00001	0.00063	0.00025	< 0.000005	0.00001	0.00009	0.00010	0.00001	0.00002	0.00003	—	0.32095	0.32095	0.00003	0.00005	0.00027	0.33718

3.4. Bleacher and Press Box Installation (2027)

3.4.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	1.83834	1.52712	12.9349	17.1920	0.02959	0.37141	—	0.37141	0.34170	—	0.34170	—	2,653.05	2,653.05	0.10762	0.02152	—	2,662.16
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.30219	0.25103	2.12628	2.82608	0.00486	0.06105	—	0.06105	0.05617	—	0.05617	—	436.118	436.118	0.01769	0.00354	—	437.615
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.05515	0.04581	0.38805	0.51576	0.00089	0.01114	—	0.01114	0.01025	—	0.01025	—	72.2044	72.2044	0.00293	0.00059	—	72.4522
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.4.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.15750	0.15485	0.10124	2.12243	0.00000	0.00000	0.40414	0.40414	0.00000	0.09473	0.09473	—	437.217	437.217	0.00617	0.01526	1.44444	443.362

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Vendor	0.00590	0.00205	0.09209	0.03616	0.00039	0.00078	0.01515	0.01593	0.00078	0.00408	0.00485	—	55.3911	55.3911	0.00338	0.00811	0.12262	58.0158
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02343	0.02077	0.01900	0.26176	0.00000	0.00000	0.06492	0.06492	0.00000	0.01519	0.01519	—	65.5085	65.5085	0.00116	0.00251	0.10257	66.3874
Vendor	0.00096	0.00033	0.01588	0.00596	0.00006	0.00013	0.00244	0.00257	0.00013	0.00066	0.00079	—	9.10457	9.10457	0.00056	0.00133	0.00869	9.52457
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00428	0.00379	0.00347	0.04777	0.00000	0.00000	0.01185	0.01185	0.00000	0.00277	0.00277	—	10.8457	10.8457	0.00019	0.00042	0.01698	10.9912
Vendor	0.00017	0.00006	0.00290	0.00109	0.00001	0.00002	0.00045	0.00047	0.00002	0.00012	0.00014	—	1.50737	1.50737	0.00009	0.00022	0.00144	1.57690
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5. Paving (2027)

3.5.1. Onsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Off-Road Equipment	0.57535	0.48071	4.15212	5.30895	0.00857	0.16795	—	0.16795	0.15451	—	0.15451	—	823.016	823.016	0.03339	0.00668	—	825.840
Paving	0.03144	0.03144	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00788	0.00659	0.05688	0.07273	0.00012	0.00230	—	0.00230	0.00212	—	0.00212	—	11.2742	11.2742	0.00046	0.00009	—	11.3129
Paving	0.00043	0.00043	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.00144	0.00120	0.01038	0.01327	0.00002	0.00042	—	0.00042	0.00039	—	0.00039	—	1.86657	1.86657	0.00008	0.00002	—	1.87298
Paving	0.00008	0.00008	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

3.5.2. Offsite - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.06891	0.06775	0.04429	0.92857	0.00000	0.00000	0.17681	0.17681	0.00000	0.04144	0.04144	—	191.282	191.282	0.00270	0.00667	0.63194	193.971
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00085	0.00076	0.00069	0.00954	0.00000	0.00000	0.00237	0.00237	0.00000	0.00055	0.00055	—	2.38833	2.38833	0.00004	0.00009	0.00374	2.42037
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00016	0.00014	0.00013	0.00174	0.00000	0.00000	0.00043	0.00043	0.00000	0.00010	0.00010	—	0.39542	0.39542	0.00001	0.00002	0.00062	0.40072
Vendor	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000
Hauling	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Mobile source emissions results are presented in Sections 2.6. No further detailed breakdown of emissions is available.

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	14.0050	14.0050	0.00048	0.00006	—	14.0360
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
High School	—	—	—	—	—	—	—	—	—	—	—	—	2.31869	2.31869	0.00008	0.00001	—	2.32382
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	—	2.31869	2.31869	0.00008	0.00001	—	2.32382

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
User Defined Recreational	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000	0.00000	—	0.00000	—	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Total	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.00000	0.00000	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
User Defined Recreational	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000
Total	—	—	—	—	—	—	—	—	—	—	—	0.00000	0.00000	0.00000	0.00000	0.00000	—	0.00000

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00047	0.00047
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
High School	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00008	0.00008

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.00008	0.00008

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Structure Removal	Demolition	6/1/2027	6/1/2027	5.00000	1.000000	—
Egress Pathway Excavation and Light Installation	Building Construction	6/1/2027	6/14/2027	5.00000	10.00000	—
Light Installation	Building Construction	6/1/2027	6/7/2027	5.00000	5.00000	—
Bleacher and Press Box Installation	Building Construction	6/1/2027	8/23/2027	5.00000	60.0000	—
Paving	Paving	6/15/2027	6/21/2027	5.00000	5.00000	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Egress Pathway Excavation and Light Installation	Concrete/Industrial Saws	Diesel	Average	1.000000	8.00000	33.0000	0.73000
Egress Pathway Excavation and Light Installation	Rubber Tired Dozers	Diesel	Average	1.000000	1.000000	367.000	0.40000
Egress Pathway Excavation and Light Installation	Tractors/Loaders/ Backhoes	Diesel	Average	2.00000	6.00000	84.0000	0.37000

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Egress Pathway Excavation and Light Installation	Cranes	Diesel	Average	1.000000	8.00000	367.000	0.29000
Egress Pathway Excavation and Light Installation	Forklifts	Diesel	Average	1.000000	8.00000	82.0000	0.20000
Light Installation	Cranes	Diesel	Average	1.000000	8.00000	367.000	0.29000
Light Installation	Forklifts	Diesel	Average	1.000000	8.00000	82.0000	0.20000
Light Installation	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	8.00000	84.0000	0.37000
Light Installation	Bore/Drill Rigs	Diesel	Average	1.000000	8.00000	83.0000	0.50000
Bleacher and Press Box Installation	Cranes	Diesel	Average	1.000000	4.00000	367.000	0.29000
Bleacher and Press Box Installation	Forklifts	Diesel	Average	2.00000	6.00000	82.0000	0.20000
Bleacher and Press Box Installation	Tractors/Loaders/ Backhoes	Diesel	Average	2.00000	8.00000	84.0000	0.37000
Bleacher and Press Box Installation	Generator Sets	Diesel	Average	1.000000	8.00000	14.0000	0.74000
Bleacher and Press Box Installation	Welders	Diesel	Average	6.00000	8.00000	46.0000	0.45000
Paving	Pavers	Diesel	Average	1.000000	7.00000	81.0000	0.42000
Paving	Rollers	Diesel	Average	1.000000	7.00000	36.0000	0.38000
Paving	Cement and Mortar Mixers	Diesel	Average	4.00000	6.00000	10.00000	0.56000
Paving	Tractors/Loaders/ Backhoes	Diesel	Average	1.000000	7.00000	84.0000	0.37000

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Structure Removal	Worker	0.00000	14.3000	LDA,LDT1,LDT2
Structure Removal	Vendor	—	8.80000	HHDT,MHDT
Structure Removal	Hauling	8.00000	20.0000	HHDT
Structure Removal	Onsite truck	—	—	HHDT
Egress Pathway Excavation and Light Installation	Worker	15.0000	14.3000	LDA,LDT1,LDT2
Egress Pathway Excavation and Light Installation	Vendor	2.00000	8.80000	HHDT,MHDT
Egress Pathway Excavation and Light Installation	Hauling	1.000000	20.0000	HHDT
Egress Pathway Excavation and Light Installation	Onsite truck	—	—	HHDT
Light Installation	Worker	0.00000	14.3000	LDA,LDT1,LDT2
Light Installation	Vendor	2.00000	8.80000	HHDT,MHDT
Light Installation	Hauling	2.00000	20.0000	HHDT
Light Installation	Onsite truck	—	—	HHDT
Bleacher and Press Box Installation	Worker	40.0000	14.3000	LDA,LDT1,LDT2
Bleacher and Press Box Installation	Vendor	2.00000	8.80000	HHDT,MHDT
Bleacher and Press Box Installation	Hauling	0.00000	20.0000	HHDT
Bleacher and Press Box Installation	Onsite truck	—	—	HHDT
Paving	Worker	17.5000	14.3000	LDA,LDT1,LDT2

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Paving	Vendor	—	8.80000	HHDT,MHDT
Paving	Hauling	0.00000	20.0000	HHDT
Paving	Onsite truck	—	—	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (sq. ft.)	Acres Paved (acres)
Structure Removal	0.00000	0.00000	0.00000	—	0.00000
Egress Pathway Excavation and Light Installation	—	39.0000	0.62500	0.00000	0.00000
Light Installation	—	66.0000	0.00000	0.00000	0.00000
Paving	0.00000	0.00000	0.00000	0.00000	0.06000

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	High School	0.00000	0%
Paving	User Defined Recreational	0.06000	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2027	0.00000	374.840	0.01290	0.00170

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Total all Land Uses	2,590.00	0.00000	0.00000	6,826.00	19,013.0	0.00000	0.00000	50,109.0

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
High School	Wood Fireplaces	0	0
High School	Gas Fireplaces	0	0
High School	Propane Fireplaces	0	0
High School	Electric Fireplaces	0	0
High School	No Fireplaces	0	0
High School	Conventional Wood Stoves	0	0
High School	Catalytic Wood Stoves	0	0
High School	Non-Catalytic Wood Stoves	0	0
High School	Pellet Wood Stoves	0	0
User Defined Recreational	Wood Fireplaces	0	0
User Defined Recreational	Gas Fireplaces	0	0
User Defined Recreational	Propane Fireplaces	0	0
User Defined Recreational	Electric Fireplaces	0	0
User Defined Recreational	No Fireplaces	0	0
User Defined Recreational	Conventional Wood Stoves	0	0
User Defined Recreational	Catalytic Wood Stoves	0	0
User Defined Recreational	Non-Catalytic Wood Stoves	0	0
User Defined Recreational	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
0.00000	0.00000	0.00000	0.00000	—

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
High School	13,637.4	374.840	0.0129	0.0017	0.00000
User Defined Recreational	0.00000	374.840	0.0129	0.0017	0.00000

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
High School	0.00000	0.00000
User Defined Recreational	0.00000	0.00000

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
High School	0.00000	0.00000
User Defined Recreational	0.00000	0.00000

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
High School	Other commercial A/C and heat pumps	R-410A	2,088.00	0.00180	4.00000	4.00000	18.0000

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	20.6700	annual days of extreme heat
Extreme Precipitation	6.00000	annual days with precipitation above 20 mm

Climate Hazard	Result for Project Location	Unit
Sea Level Rise	—	meters of inundation depth
Wildfire	0.00000	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters

Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	0	0	N/A
Extreme Precipitation	2	0	0	N/A
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	1	0	0	N/A
Flooding	0	0	0	N/A
Drought	0	0	0	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	1	1	1	2
Extreme Precipitation	2	1	1	3
Sea Level Rise	N/A	N/A	N/A	N/A
Wildfire	1	1	1	2
Flooding	1	1	1	2
Drought	1	1	1	2
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.

The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.

The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	55.3827
AQ-PM	40.6596
AQ-DPM	43.9950
Drinking Water	74.3474
Lead Risk Housing	29.2502
Pesticides	0.00000
Toxic Releases	25.6689
Traffic	19.5375
Effect Indicators	—
CleanUp Sites	0.00000
Groundwater	59.6048
Haz Waste Facilities/Generators	16.6380
Impaired Water Bodies	66.7367
Solid Waste	0.00000
Sensitive Population	—
Asthma	47.8689
Cardio-vascular	28.6142
Low Birth Weights	96.5999
Socioeconomic Factor Indicators	—

Indicator	Result for Project Census Tract
Education	3.11314
Housing	2.99113
Linguistic	1.81351
Poverty	4.57286
Unemployment	7.76939

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	92.39060695
Employed	37.66200436
Median HI	91.10740408
Education	—
Bachelor's or higher	93.58398563
High school enrollment	100
Preschool enrollment	66.32875658
Transportation	—
Auto Access	62.47914795
Active commuting	42.96163223
Social	—

Indicator	Result for Project Census Tract
2-parent households	80.03336327
Voting	99.0632619
Neighborhood	—
Alcohol availability	82.26613628
Park access	53.98434492
Retail density	42.93596818
Supermarket access	34.63364558
Tree canopy	94.94418067
Housing	—
Homeownership	89.69588092
Housing habitability	85.24316694
Low-inc homeowner severe housing cost burden	32.27255229
Low-inc renter severe housing cost burden	73.36070833
Uncrowded housing	89.4649044
Health Outcomes	—
Insured adults	86.94982677
Arthritis	0.0
Asthma ER Admissions	50.9
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0

Indicator	Result for Project Census Tract
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0
Life Expectancy at Birth	46.6
Cognitively Disabled	70.6
Physically Disabled	57.4
Heart Attack ER Admissions	74.8
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	62.1
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	95.4

Indicator	Result for Project Census Tract
Elderly	4.7
English Speaking	94.5
Foreign-born	6.9
Outdoor Workers	98.2
Climate Change Adaptive Capacity	—
Impervious Surface Cover	80.6
Traffic Density	48.9
Traffic Access	23.0
Other Indices	—
Hardship	6.9
Other Decision Support	—
2016 Voting	95.7

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	21.0000
Healthy Places Index Score for Project Location (b)	90.0000
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Project land uses.
Construction: Construction Phases	Project schedule.
Construction: Off-Road Equipment	Project equipment.
Construction: Dust From Material Movement	Excavated materials for light installation.
Construction: Trips and VMT	Project trips.
Construction: Paving	Only egress pathway is repaved.
Operations: Consumer Products	No consumer product use for stadium improvements.
Operations: Architectural Coatings	No architectural coatings for stadium improvements.

Screen	Justification
Operations: Energy Use	No natural gas.
Operations: Water and Waste Water	No water consumption.
Operations: Solid Waste	No waste generation.
Operations: Refrigerants	Assume only commercial A/C for press box.

8.3. Land Use

Model Parameter	Units	Default Value	New Value
Lot Area	acre	0.00000	0.30000
Landscape Area	sq. ft	—	0.00000

8.4. Construction

8.4.1. Construction Phases

Phase Type	Phase Name	Model Parameter	Default Value	New Value
Paving	Paving	Start Date	11/9/2027	6/15/2027
Paving	Paving	End Date	11/16/2027	6/21/2027

8.4.2. Off-Road Equipment

Phase Name	Equipment Type	Model Parameter	Default Value	New Value
Light Installation	Cranes	Hours Per Day	4.00000	8.00000
Light Installation	Forklifts	Number per Day	2.00000	1.000000

Phase Name	Equipment Type	Model Parameter	Default Value	New Value
Light Installation	Forklifts	Hours Per Day	6.00000	8.00000
Light Installation	Tractors/Loaders/Backhoes	Number per Day	2.00000	1.000000

8.4.6. Trips and VMT

Phase Name	Trip Type	Model Parameter	Default Value	New Value
Structure Removal	Hauling	One-Way Trips per Day	0.00000	8.00000
Egress Pathway Excavation and Light Installation	Worker	One-Way Trips per Day	0.12600	15.0000
Egress Pathway Excavation and Light Installation	Vendor	One-Way Trips per Day	0.04917	2.00000
Egress Pathway Excavation and Light Installation	Hauling	One-Way Trips per Day	0.50000	1.000000
Light Installation	Worker	One-Way Trips per Day	0.12600	0.00000
Light Installation	Vendor	One-Way Trips per Day	0.04917	2.00000
Light Installation	Hauling	One-Way Trips per Day	1.80000	2.00000
Bleacher and Press Box Installation	Worker	One-Way Trips per Day	0.12600	40.0000
Bleacher and Press Box Installation	Vendor	One-Way Trips per Day	0.04917	2.00000

8.4.9. Paving

Phase Name	Land Use	Model Parameter	Units	Default Value	New Value
Paving	User Defined Recreational	Area Paved	acres	0.00000	0.06000
Paving	User Defined Recreational	% Asphalt	%	0.00000	100.0000

8.5. Operations

8.5.2. Area Sources

8.5.2.2. Consumer Products

Model Parameter	Units	Default Value	New Value
General Category	lb/sqft/day	0.00002	0.00000
City Park/Golf Course Pesticides/Fertilizers	lb/sqft/day	< 0.000005	0.00000
Parking Degreaser	lb/sqft/day	< 0.000005	0.00000

8.5.2.3. Architectural Coatings

Model Parameter	Units	Default Value	New Value
Non-Residential Interior Area	sq ft	450.000	0.00000
Non-Residential Exterior Area	sq ft	150.000	0.00000

8.5.3. Energy Usage

Land Use	Model Parameter	Units	Default Value	New Value
High School	Electricity	kWh/yr	2,287.06	13,637.4
High School	Electricity (Subject to Title 24)	kWh/yr	1,979.25	11,802.0
High School	Electricity (Not Subject to Title 24)	kWh/yr	307.810	1,835.43
High School	Natural Gas	kBTU/yr	6,743.34	0.00000
High School	Natural Gas (Subject to Title 24)	kBTU/yr	6,628.63	0.00000
High School	Natural Gas (Not Subject to Title 24)	kBTU/yr	114.703	0.00000

8.5.4. Water and Waste Water

Land Use	Model Parameter	Units	Default Value	New Value
High School	Indoor Water	gal/year	9,961.39	0.00000

8.5.5. Solid Waste

Land Use	Model Parameter	Units	Default Value	New Value
High School	Solid Waste Generation Rate	ton/1000sqft/yr	1.30000	0.00000