

2019100342

**NATOMAS UNIFIED SCHOOL DISTRICT  
NOTICE OF EXEMPTION, CALIFORNIA  
ENVIRONMENTAL QUALITY ACT**

**To:** Office of Planning and Research  
1400 Tenth Street, Room 100  
Sacramento, CA 95814

Sacramento County Clerk/Recorder  
600 8th Street  
Sacramento, CA 95814

**Project Title:** Bannon Creek School Modernization Project

**Project Address:** 2775 Millcreek Drive

**Project Location:** City of Sacramento

**County of:** Sacramento

**Project Description:** The project involves constructing a new on-site building and a new outdoor athletic track, and implementing a variety of additional on-site improvements, as described below.

- Construct a new 15,600-square-foot multi-purpose building, with associated new entry plazas and landscaping, including a gymnasium with changing rooms, bleachers, a stage, restrooms, and two 1,100-square-foot flexible classroom spaces.
- Construct a new outdoor athletic track; the inside of the track oval would be composed of turf grass to be used for playfields.
- Renovate existing hardscapes, including improvements to the existing drive isle at the entry from Millcreek Drive and the existing drive isle at the entry from Bannon Creek Drive.
- Renovate the existing hardcourt play areas.
- Install a small new outdoor play area with new apparatus.
- Install new landscaping around the new building and the athletic track and install upgrades to the existing irrigation system.
- Perform upgrades throughout the campus to meet Americans with Disabilities Act (ADA) compliance.
- Perform technology upgrades.
- Perform upgrades to the fire and intrusion alarms.

Two portable classrooms that were formerly present on the campus were removed in 2018. The proposed project is not intended to increase the school's maximum student capacity; rather, the project is necessary to upgrade and modernize the existing multi-purpose spaces and install an outdoor athletic track to accommodate both athletics and performing arts that are an important part of today's school curricula, and to provide two new, upgraded classroom learning spaces to replace the former portable classrooms.

The new and upgraded facilities would be designed to meet all requirements of the Division of the State Architect (DSA). Underground utility improvements and upgrades with existing utility providers would be performed, as needed, to service the new building.

**Name of Person or Agency Carrying Out Project:** Natomas Unified School District

**Name of Public Agency Approving Project:** Natomas Unified School District

**Exempt Status: (check one)**

<input type="checkbox"/>	Ministerial Project (Section 21080[b][1]; 15268)
<input checked="" type="checkbox"/>	Categorically Exempt (Section 15314)
<input type="checkbox"/>	Declared Emergency (Section 21080[b][3]; 15269[a])
<input type="checkbox"/>	Emergency Project (Section 21080[b][4]; 15269[b][c])
<input type="checkbox"/>	Statutory Exemption (Public Resources Code Section 21080.35)
<input type="checkbox"/>	The project clearly will not have a significant effect on the environment (15061[b][3])

**Reasons why project is exempt:** CEQA Guidelines Sections 15300–15333 include a list of classes of projects that have been determined not to have a significant effect on the environment and that are categorically exempt from the provisions of CEQA.

The project is exempt under the following section of the CEQA Guidelines: 15314 (Class 14–Minor Additions to Schools). The project meets the conditions for a categorical exemption described in this section of the CEQA Guidelines, as explained below.

- (1) Class 14 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. The addition of portable classrooms is included in this exemption.**

The project would provide a new, modern multi-purpose building and a new outdoor athletic track that will accommodate the needs of today's student body for both athletics and performing arts, and modernize existing school buildings for ADA compliance. Two portable classrooms were removed in 2018, and the project includes construction of two flexible classroom spaces in the new multi-purpose building to replace the classroom space that was lost when the portables were removed. The total enrollment during the 2018-2019 school year was 548 students.<sup>1</sup> The proposed project would not expand the existing student capacity. Therefore, the proposed project would not increase the student capacity by more than 25% or 10 classrooms.

- (2) The project is consistent with applicable general plan designation, applicable policies, and applicable zoning designation and regulations.**

The Bannon Creek School campus is zoned Single Family Residential (R-1). Public, K-12 schools are a conditionally permitted use on parcels zoned R-1 under the City of Sacramento zoning code. The site is designated for public/quasi-public land uses under the City of Sacramento 2035 General Plan. The City's zoning code implements the General Plan.

- (3) The project site has no value as habitat for endangered, rare, or threatened species.**

The project site is fully developed as a school campus with associated urban landscaping. The project would be confined to the existing Bannon Creek School campus, which is surrounded by existing residential development to the north, east, and south, and by the Bannon Creek Parkway to the west. The project site does not contain any sensitive habitat or habitat for

<sup>1</sup> California Department of Education. 2019. *2018-19 Enrollment by Grade*.  
<https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=3475283&aggllevel=district&year=2018-19>.

special-status species. Thus, the project site has no value for endangered, rare, or threatened species.

### Exceptions to the Exemptions

Certain exceptions to the use of a categorical exemption are found in CEQA Guidelines Section 15300.2. The District has determined that the project is not subject to any of these exceptions for the reasons discussed below.

- (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.**

This exception only applies to Classes 3, 4, 5, 6, and 11. These classifications do not apply to this project; therefore, this exception is not discussed further.

- (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.**

Improvements at the Bannon Creek School are focused on modernization of the existing school campus to meet current code requirements and improve the learning environment, and to provide necessary specialized learning platforms that are currently not present on the campus (e.g., a performing arts area and an outdoor athletic track). The project would not contribute to any cumulative environmental impacts due to the scale of the project and the lack of significant environmental impacts.

- (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.**

There are no unusual circumstances at the project site or part of project operations that would result in significant effects on the environment. The project site is currently developed with an existing school campus and would continue to be used as a school. The project would be constructed within the existing school campus. There are no sensitive natural resources, hazardous materials sites, areas of severe geologic constraints, known cultural or tribal resources, or agricultural resources on this existing developed school site that would be affected by the project.

### Noise

The project includes installation of a new outdoor athletic sports track, which would be located approximately 100 feet from the nearest residence (to the south). The athletic track would not be lighted and would not be used for nighttime sporting events. At a distance of 100 feet from an elementary school playground being used by 100 students, average noise level of 60 dB Leq, can be expected (Sacramento County 2011). This is consistent with the City's Exterior Noise Compatibility Standards for residential development, which are between 60 and 65 A-weighted decibels (dBA) (City of Sacramento 2015).<sup>2</sup>

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<sup>2</sup> For more detail, please see the City's website: <http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/Environmental-Constraints.pdf?la=en>.

### **Traffic**

No roads would be closed during construction, and all construction personnel and equipment would be confined to the school property. Due to the scale of the project, the increase in construction traffic on local roadways would be very minor, and would be short-term and temporary. Additional operational-phase traffic along Bannon Creek Drive and Millcreek Drive could occur for attendance at occasional after-school sporting events held at the track. However, this traffic would occur after regular school hours, and would be accommodated by existing on-site parking along Millcreek Drive. As previously stated, the track would not be lighted and would not be used at night. The amount of sports-related afternoon traffic would be minor, and would not result in a substantial increase in vehicle miles traveled. The project includes appropriate upgrades to internal roadway and pedestrian facilities, including bicycle storage, along with new drive isles to support appropriate emergency access.

### **Forestry Resources**

The project site is developed with an existing K-8 school and supporting facilities such as outdoor play areas, roads, and parking lots. The project site does not support 10 percent native tree cover, does not allow for management of one or more forest resources, and does not include habitat for sensitive plant or animal species.

### **Biological Resources**

Four existing non-native urban landscape trees on the school campus would be removed to accommodate the proposed facilities. Bannon Slough (i.e., Bannon Creek) flows through Bannon Creek Parkway, approximately 100 feet west of the proposed new outdoor athletic track. Native trees and other vegetation associated with the creek are adjacent to the western school campus property boundary. Potential indirect impacts on riparian habitat associated with Bannon Creek that could be caused by pollutants transported by urban runoff would be avoided by preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) with associated Best Management Practices (BMPs) during the construction phase, and by expanding the on-site stormwater drainage system during the operational phase (described in further detail below under the heading, "Hydrology/Water Quality").

### **Air Quality/Greenhouse Gasses**

The proposed construction effort is not large enough to result in significant short-term construction-related or long-term operation-related air quality or greenhouse gas emissions. The project will implement Sacramento Metropolitan Air Quality Management District Basic Construction Emission Control Practices during construction, which include watering of exposed surfaces for dust control, minimizing idling time to five minutes or less, and covering all exposed surfaces.

### **Aesthetics/Recreation**

The southern end of Bannon Creek Parkway is adjacent to and west of the existing school campus. Because construction activities and equipment would be confined to the existing school property, Bannon Creek Parkway would not require closure. Recreationists using the parkway during construction activities would likely experience minor effects from construction noise, dust, and the visual presence of construction equipment and personnel. However, these effects would be minor and short-term. At the conclusion of project-related activities, the new outdoor athletic track and the gymnasium/multi-purpose building would be visible from the parkway. However, the athletic track would be a flat, at-grade feature, and the new building would be consistent in size and appearance with existing school campus buildings. Numerous large native deciduous trees are present within Bannon Creek Parkway near the western school

campus boundary. During the spring, summer, and fall, these trees would provide partial screening of the new school facilities from the park. The new school building would be designed with modern architectural features, and would be similar to the existing campus buildings. Therefore, the visual appearance of the outdoor athletic track and the new gymnasium/multi-purpose building would not substantially detract from public views to the east from Bannon Creek Parkway, and would be visually consistent with typical school campus development that is already present adjacent to the park and parkway. As previously stated, the new outdoor athletic track would not be equipped with nighttime lighting. Minor nighttime lighting for security purposes would be installed at the new classroom and multi-purpose buildings; this lighting would be shielded and directed downward to avoid nighttime glare and light spillover effects. The existing school campus is located in an urbanized area that already includes nighttime lighting.

### **Hydrology/Water Quality**

As previously stated, Bannon Creek is approximately 100 feet west of the proposed new outdoor athletic track. The existing on-site underground storm drain system at the school campus would continue to be used. Construction of the new building and the new outdoor athletic track would result in a minor operational increase in the amount of on-site impervious surfaces. However, the inside oval of the track would be vegetated with turf grass, and the areas adjacent to and outside of the track would continue to exist as turf grass and mature shade trees, which would help to absorb stormwater runoff and naturally filter any urban pollutants. This runoff would then percolate back into the groundwater aquifer. In addition, the existing underground stormwater drainage system would be expanded to capture runoff from the new multi-purpose building/gymnasium and the new athletic track. Because only minor increases in stormwater runoff from the new facilities would occur, the project would not substantially alter the on-site stormwater drainage system in a manner that would result in downstream erosion or flooding, or create additional runoff that would exceed the capacity of existing storm drainage conveyance systems. Furthermore, because the project would involve disturbance of an area greater than one acre, the District will prepare and implement a SWPPP with associated BMPs specifically designed to reduce erosion and subsequent downstream sedimentation, and reduce the potential for downstream pollutant transport, as required by the Central Valley Regional Water Quality Control Board. Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, including water quality in Bannon Creek.

### **Utilities**

The project site is served by existing potable water, sewer, and electrical utilities, and only minor upgrades would be implemented, as necessary, to ensure the quality of long-term service for the new facilities. The District would coordinate with the City of Sacramento to determine the most appropriate types of new connections to the existing sewer and water conveyance systems for the new multi-purpose/gymnasium building. Because the proposed project would not increase the student capacity, the minor new sewer and water connections required to serve the new building, along with minor changes to the on-site storm drainage system to serve the new building and the new track, would not result in operational impacts that would significantly increase the amount of stormwater runoff, require additional supplies of potable water, or require additional wastewater treatment capacity at the Sacramento Regional Wastewater Treatment Plant.

The District would coordinate new fire-flow requirements and the locations, geometry, and signage of new fire lanes accessing the new multi-purpose/gymnasium building, with the City of Sacramento Fire Department. Facilities would be constructed to meet City Fire Protection

Standards. The existing school campus is located in an urbanized, Local Responsibility Area, and is not located in or near a high or very high California Department of Forestry and Fire Protection (CAL FIRE) wildfire hazard area.<sup>3</sup>

**(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.**

The project site is not visible from any state- or locally-designated scenic highway. The closest state-designated scenic highway to the school site is State Route 160 near Freeport, which is approximately 10.5 miles to the southwest. Although the locally-designated scenic corridor portion of Garden Highway is approximately 0.6 miles to the southwest, the project site is not visible from this portion of Garden Highway due to intervening vegetation and buildings.

**(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.**

Based on a review of hazardous materials databases maintained by the State Water Resources Control Board<sup>4</sup> and the California Department of Toxic Substances Control<sup>5</sup>, there are no open, active cases of hazardous materials contamination, or any permitted underground storage tanks, at or within 0.5 mile of the Bannon Creek School campus.

Project-related activities would involve the use and temporary storage of small amounts of hazardous substances necessary for the operation of construction equipment, such as fuels, lubricants, and oils, as well as small amounts of paint and solvents. All materials are required to be used and stored in compliance with local, State, and federal ordinances, laws, regulations and policies related to hazardous materials. None of the substances would be acutely hazardous.

**(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.**

The Bannon Creek School was constructed in 1991. Therefore, the campus does not constitute a historical resource, and the proposed project would not result in a substantial adverse change in the significance of a historical resource.

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**Lead Agency:** Natomas Unified School District

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<sup>3</sup> California Department of Forestry and Fire Protection. 2008. Fire Hazard Severity Zone Maps, Sacramento County. <https://osfm.fire.ca.gov/divisions/wildfire-prevention-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/>.

<sup>4</sup> State Water Resources Control Board. 2019. GeoTracker. Available: <https://geotracker.waterboards.ca.gov/>.

<sup>5</sup> California Department of Toxic Substances Control. 2019. EnviroStor. Available: <https://www.envirostor.dtsc.ca.gov/public/>.

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Signature: *Javetta Cleveland* Date: *10/9/19*

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Governor's Office of Planning & Research

OCT 17 2019

STATE CLEARINGHOUSE