California Environmental Quality Act

Initial Study

(State Clearinghouse No. 2019110288)

New Hilmar Unified Elementary School Project

Hilmar, California

Lead Agency and Project Sponsor:

Hilmar Unified School District

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February 2021

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Executive Summary

The New Hilmar Unified Elementary School Project (project) includes construction and operation of a new elementary school campus and reconfiguration of the existing Elim Elementary School campus. The project site is located on approximately 15.5 acres at the northwest corner of Geer Avenue and Pearl Street in the unincorporated community of Hilmar in Merced County. The site encompasses a grass-turfed area currently being used by Hilmar High School as well as a portion of the existing Elim Elementary School site.

The new elementary school campus will provide instruction for TK through 2nd grades and will serve approximately 600 students. Buildout of the new campus will include six classroom buildings housing 25 classrooms; one building housing a library and administrative office; a multipurpose building with an outdoor amphitheater area; and recreational areas including hardcourts, play structures, and turfed play areas. At the Elim Elementary campus, the "front" of Elim will be reoriented from facing Lander Avenue (State Route 165) to facing a new interior access area, where a new administration building will be constructed for the Elim campus. New driveways from Geer Avenue will serve as the main access to both elementary schools. A parking area with approximately 58 spaces is proposed to be developed along the eastern portion of the new elementary school campus. The project will also construct designated vehicle and bus drop-off areas for each campus.

As part of the project's operation, TK through 2nd grades will relocate from Elim Elementary to the new elementary school, leaving Elim with 3rd through 5th grades. Elim's current student population will be reduced from approximately 1,000 to 500 students, and 24 classrooms (all portables) will be removed from its current total of 50 classrooms, leaving the Elim campus with approximately 26 classrooms. The project will increase overall student capacity from approximately 1,000 to 1,200 total students in TK through 5th grades. While each campus is anticipated to have a maximum of 60 staff, it is anticipated that some staff will be shared given the proximity of the schools.

The project is planned to begin construction early 2022 and be completed by spring 2023.

Based on the California Environmental Quality Act Guidelines (CEQA Guidelines), the purpose of this Initial Study is to provide Hilmar Unified School District ("District") with environmental information on the project to use as the basis for deciding whether to prepare an Environmental Impact Report or a Negative Declaration for the project.

The conclusions of the Initial Study are as follows:

1. The Initial Study identified a number of potentially significant environmental effects of the project in the following subject areas: aesthetics, air quality, biological resources, cultural resources, geology and soils, hydrology and water quality, noise, transportation, tribal cultural resources, and utilities and service systems. The District can avoid or reduce to an insignificant level these impacts by incorporating in the project the mitigation measures listed in Summary Table of Mitigation Measures on the following pages.
2. The project would have a less than significant impact or no impact on many of the environmental resources and conditions evaluated in the Initial Study. The Initial Study explains why there would be no impacts or the impacts would be less than significant.
3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the project.

Summary Table of Mitigation Measures

Aesthetics	**Mitigation for Potential Lighting and Glare Impacts** **AE-1.** The following measures shall be incorporated into development and operation of the project in order to reduce impacts from lighting and glare: a. All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed. b. All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area. c. Exterior building lighting for security or aesthetics shall be full cut-off or a shielded type design to minimize any upward distribution of light.
Air Quality	**Mitigation Measures to Reduce Localized Pollutant Concentrations** The following measures shall be implemented to reduce potential expose of sensitive receptors to localized concentrations of construction-generated PM at nearby sensitive receptors and land uses during project construction. The term "construction" as used here shall refer broadly to pre-operational site preparation activities (e.g., excavation and grading). **AQ-1.** On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles: a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and, b. Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation. **AQ-2.** Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-road Diesel regulation. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and ww.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf. **AQ-3.** Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's five-minute idling limit. **AQ-4.** To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents. **AQ-5.** Construction truck trips shall be scheduled, to the extent possible, to occur during non-peak hours. **AQ-6.** The burning of vegetative material shall be prohibited. **AQ-7.** Low VOC-content (50 grams per liter, or less) exterior and interior building paints shall be used. To the extent locally available, use prefinished/pre-colored building construction components and materials.

	AQ-8. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL: https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented: a. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover. b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant. c. All land clearing, grubbing, scraping, excavation, land leveling, grading, and cut & fill activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking. d. When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained. e. Trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.) f. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant. g. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph. h. Sandbags or other erosion control measures shall be installed sufficient to prevent silt runoff to public roadways from sites with a slope greater than one percent. i. Excavation and grading activities shall be suspended when winds exceed sustained speeds of 20 miles per hour (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation). **AQ-9.** The above measures for the control of construction-generated emissions shall be included on site grading and construction plans.
Biological Resources	**Mitigation for Potential Impacts to Nesting Birds** **BR-1:** The following shall be implemented to avoid potential impacts to nesting birds: <u>1. Avoidance:</u> If feasible, any vegetation removal within the project area shall take place between September 1 and February 1 to avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act (MBTA). No surveys will be required if project timing occurs outside the bird nesting season. If vegetation removal must occur during the nesting season, project construction may be delayed due to actively nesting birds and their required protective buffers. <u>2. Pre-construction Surveys:</u> a. If construction is to begin during the nesting season (February 1 through August 31), a qualified biologist shall conduct a pre-construction survey within 14 days prior to initiation of disturbance activities. This survey will search for nest sites within the project area. b. Surveys for burrowing owl will occur within 14 days prior to any ground disturbance, no matter the season. This survey will cover potential burrowing owl burrows in the project area and suitable habitat within 150 m (500 ft). Evaluation of use by owls shall be in

	accordance with California Department of Fish and Wildlife survey guidelines (CBOC 1993, CDFG 1995, CDFG 2012). Surveys will document if burrowing owls are nesting or using habitat in or directly adjacent to the project area. Survey results will be valid only for the season (breeding (Feb 1-Aug 31) or non-breeding (Sept 1-Jan 31) during which the survey is conducted. c. If the pre-construction survey does not detect any active nests or burrows, then no further action is required. If the survey does detect an active nest or burrow, then the District shall implement the following mitigation measures. <u>3. Minimization/Establish Buffers:</u> a. If any active nests are discovered, the District shall contact the United States Fish and Wildlife Service and/or California Department of Fish and Wildlife to determine protective measures required to avoid take. These measures could include fencing an area where a nest occurs or shifting construction work temporally or spatially away from the nesting birds. Biologists would be required on site to monitor construction activity while protected migratory birds are nesting in the project area. If an active nest is found after the completion of the pre-construction surveys and after construction begins, all construction activities shall stop until a qualified biologist has evaluated the nest and erected the appropriate buffer around the nest. b. If burrowing owls are detected within the survey area, CDFW will be consulted to determine the suitable buffer. These buffers will consider the level of disturbance of the project activity, existing disturbance of the site (vehicle traffic, humans, pets, etc.), and time of year (nesting vs. wintering). If avoidance is not feasible, the District will work with CDFW to determine appropriate mitigation, such as passive exclusion or translocation, and associated mitigation land offset (CDFG 2012).
Cultural Resources	**Mitigation for Potential Discovery of Subsurface Cultural Resources** **CR-1:** If cultural resources are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the qualified cultural resources specialist shall make recommendations to the Lead Agency on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. **CR-2:** If human remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.
Geology and Soils	**Mitigation for Potential Discovery of Subsurface Paleontological Resources** **GS-1:** In the event that unique paleontological resources are discovered during ground disturbing activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. If the resources are determined to be potentially significant, the qualified paleontologist shall make recommendations to the District on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation and evaluation of the resources.

Noise	**Mitigation for Construction-Generated Noise Levels** **N-1:** The following measures shall be implemented to reduce construction-generated noise levels. The term "construction" as used here shall refer broadly to pre-operational site preparation activities (e.g., excavation and grading). a. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. Construction activities shall be prohibited on Sundays and legal holidays. b. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours and truck haul routes shall be selected to minimize impacts to nearby residential dwellings. c. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation. d. Stationary construction equipment (e.g., portable power generators) should be located at the furthest distance possible from nearby residences. If deemed necessary, portable noise barriers shall be erected sufficient to shield nearby residences from direct line-of-sight of stationary construction equipment. e. When not in use, all equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site.
Transportation	**Mitigation for Bicycle and Pedestrian-Related Impacts** **T-1:** The District shall coordinate with the County of Merced Public Works Department to determine the appropriate implementation schedule for the District installation of a Class II Bike Lane and walkways that are Americans With Disabilities Act (ADA)-compliant along the project's frontage to Geer Avenue.
Tribal Cultural Resources	**Mitigation for Potential Discovery of Subsurface Resources** **TC-1:** If tribal cultural resources are discovered during ground disturbing activities, work shall stop in the immediate vicinity of the find and a qualified professional with expertise in tribal cultural resources shall be consulted to recommend an appropriate course of action with the input of potentially affected tribes. If it is determined that the project may cause a substantial adverse change to a tribal cultural resource, mitigation measures to be considered should include those identified in Public Resources Code Section 21084.3.
Utilities and Service Systems; Hydrology and Water Quality	**Provision of Storm Water Drainage Improvements** **US-1:** Prior to operation of the project, the District shall undertake one of the following courses of action to provide for storm drainage at the project site: a. Submit details of the project to the Hilmar County Water District (Hilmar CWD) and the County of Merced, and if necessary, enter into an agreement for acceptance of storm water runoff generated from development of the project. Such an agreement may be subject to the requirement of showing there will be no net increase in discharge to the drainage system as a result of accepting runoff generated from the project. b. Install on-site storm water retention facilities capable of retaining storm water runoff generated from development of the project. Development of retention facilities would be subject to compliance with all applicable Merced County requirements for designing and constructing any necessary storm drainage facilities, as well as all other applicable federal, state, and local regulations related to the provision of on-site storm drainage facilities.

A. Project Background Information

1. Project Title, Lead Agency, and Lead Agency Contact Information

- Project Title: New Hilmar Unified Elementary School Project
- Lead Agency: Hilmar Unified School District
- Contact: Jim Bullock
  Director of Capital Projects, Operations & Safety
  7807 N. Lander Avenue, Hilmar, CA 95324
  Phone: (209) 669-2907
  Email: jbullock@hilmar.k12.ca.us

2. Project Location

The location of the proposed project is at the northwest corner of Geer Avenue and Pearl Street within the unincorporated community of Hilmar in Merced County (see Table A-1 and Figures 1, 2, and 3). The proposed site would encompass approximately 15.5 acres, which includes land for public improvements. Surrounding development to the north, east, and west consists of public school facilities and single-family residences, while development to the south consists of agricultural uses and low-density single-family residences.

TABLE A-1
Project Location

City	**Hilmar (unincorporated)**
County	Merced
Zip Code	95324
Assessor's Parcel Number	017-060-005-000; 017-060-003-000; 017-060-001-000
Nearest Existing Major Cross Streets	Geer Avenue and Lander Avenue (CA-165)
Elevation	Approximately 100 ft. AMSL
USGS Map	Turlock Quadrangle
Section, Township & Range	Portion of Section 22, Township 6 South, Range 10 East, Mount Diablo Base and Meridian
Latitude/Longitude	37°23'53"N, -120°51'13"W

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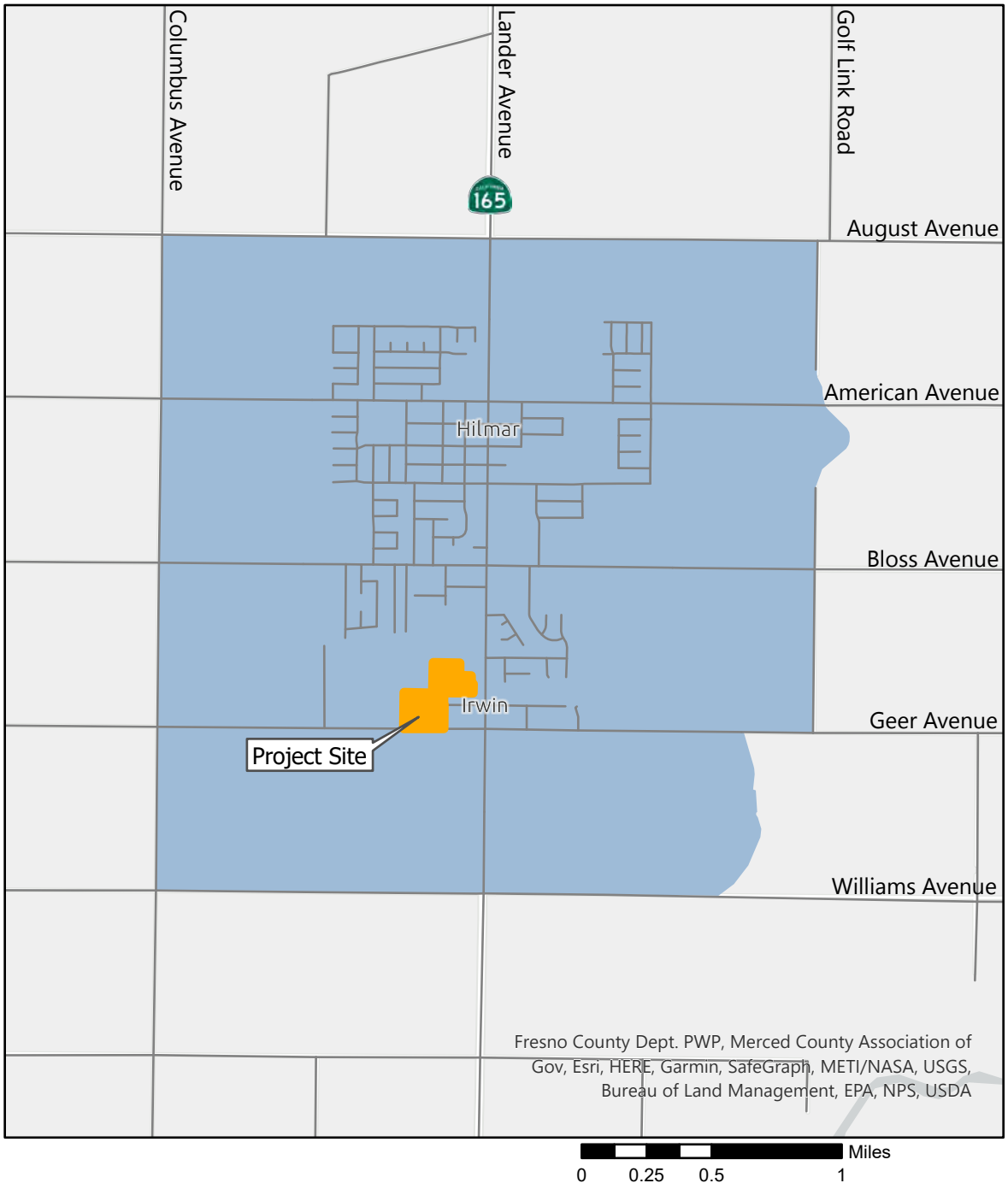
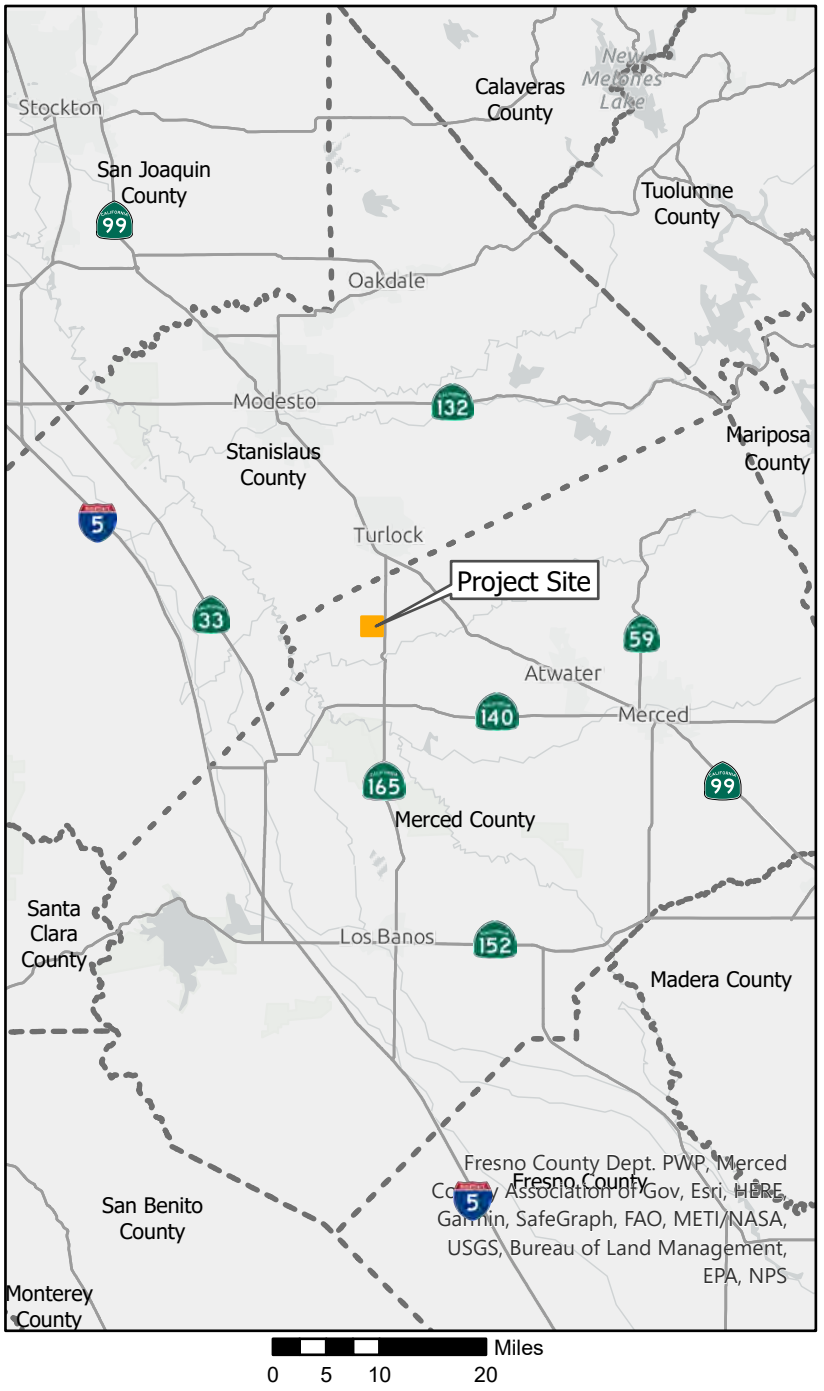




Local and Regional Location

Figure 1

New Elementary School Project
Hilmar Unified School District

ODELL Planning & Research, Inc.
Environmental Planning • School Facility Planning • Demographics

Project Site
Hilmar Census Designated Place

N

Project Site

Figure 2

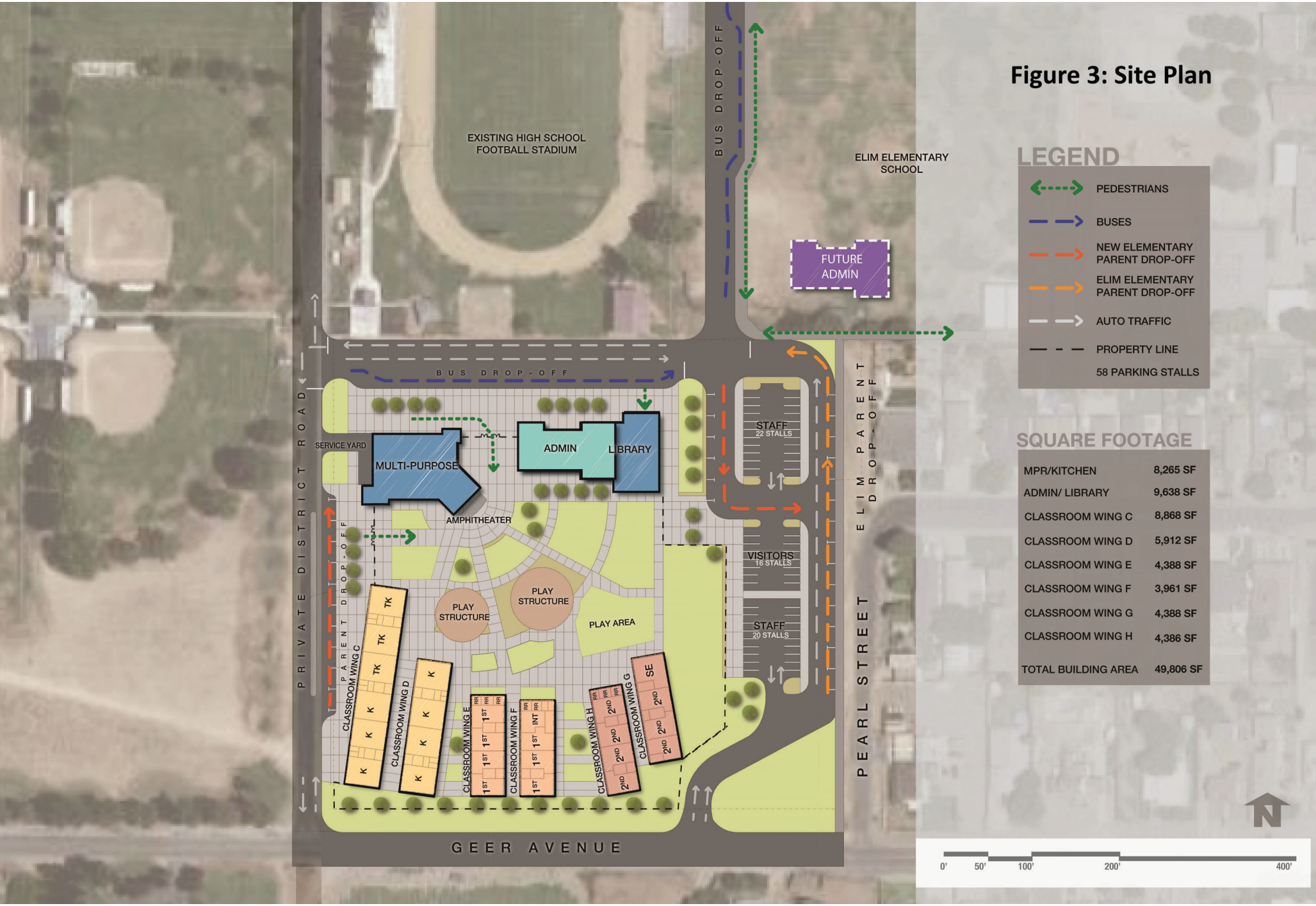
New Elementary School Project
Hilmar Unified School District

ODELL Planning & Research, Inc.
Environmental Planning • School Facility Planning • Demographics

0 125 250 500 Feet

N

Figure 3: Site Plan



LEGEND

- PEDESTRIANS
- BUSES
- NEW ELEMENTARY PARENT DROP-OFF
- ELIM ELEMENTARY PARENT DROP-OFF
- AUTO TRAFFIC
- PROPERTY LINE
- 58 PARKING STALLS

SQUARE FOOTAGE

MPR/KITCHEN	8,265 SF
ADMIN/ LIBRARY	9,638 SF
CLASSROOM WING C	8,868 SF
CLASSROOM WING D	5,912 SF
CLASSROOM WING E	4,388 SF
CLASSROOM WING F	3,961 SF
CLASSROOM WING G	4,388 SF
CLASSROOM WING H	4,386 SF
TOTAL BUILDING AREA	49,806 SF

3. Project Description

Following are the major design, construction, and operational characteristics of the proposed project:

- ***Project Objectives:*** To provide additional elementary school facilities at a centralized location for the benefit of students residing within Hilmar Unified School District.
- ***Existing Project Site Characteristics:*** The project site encompasses approximately 15.5 acres and is currently occupied by portions of the Hilmar High School and Elim Elementary School campuses. A majority of the site consists of turfed recreational fields. The eastern part of the project site includes a portion of the Elim Elementary campus that is currently occupied by portable classrooms and hardcourt areas. The remainder of the site consists of vacant land, trees and landscaping, and existing access roads that serve the campus. Development adjacent to the project site includes Hilmar Unified school facilities to the north and west, single-family residences to the east, and agricultural and low-density residential uses to the south.
- ***Proposed Facilities:*** The new elementary school campus would encompass approximately 10 acres and include the following facilities: six classroom buildings housing 25 classrooms; one building housing a library and administrative office; one multipurpose building with an outdoor amphitheater area; and recreational areas including hardcourts, play structures, and turfed play areas. Modifications to the Elim Elementary School campus would encompass approximately 5.5 acres and include reorienting the "front" of Elim from Lander Avenue (State Route 165) to a new interior access area, constructing a new administration building, and removing 24 existing classrooms housed in portable buildings (leaving approximately 26 classrooms at the Elim campus). New driveways from Geer Avenue will serve as the main access to both elementary schools. A parking area with approximately 58 spaces is proposed to be developed along the eastern portion of the new elementary school campus. The project will also include designated vehicle and bus drop-off areas for each campus.
- ***Planned Grade Levels and Enrollment:*** The project will increase overall student capacity from approximately 1,000 students to 1,200 students. The new elementary school campus will provide instruction for TK through 2nd grades and will have capacity for up to 600 students. As part of the project's operation, existing TK through 2nd grades will relocate from Elim Elementary School to the new elementary school, leaving Elim Elementary with 3rd through 5th grades. Initially, Elim's student population would be reduced from approximately 1,000 students to approximately 500 students, and the Elim campus as reconfigured would have capacity for up to 600 students.
- ***Estimated Employment:*** Each campus is anticipated to have a maximum of 60 staff. Per the District, some staff will be shared between Elim and the new campus. For both campuses, not all employees would be on the campus at the same time.
- ***Operational Schedule:*** The campuses would be in regular session on weekdays from late August to early June. Each of the schools may host special events and classes during evenings, on weekends, and during the summer recess.
- ***Timing:*** Construction of the project is anticipated to begin in early 2022 and be completed by spring 2023.

4. Actions Required to Implement Project

Hilmar Unified School District must undertake the following actions in order to implement the project:

- Complete the California Environmental Quality Act process for the project. This would involve either the adoption of a mitigated negative declaration for the project or the preparation of an environmental impact report. Based on the results of this Initial Study, the District should consider the adoption of a mitigated negative declaration for the project;
- Adopt and implement the Mitigation Monitoring and Reporting Program identified in Part F of this Initial Study;
- Approve the project;
- Complete the California Department of Education school site approval process;

- Secure approvals, permits, and agreements, as necessary, from agencies and utilities that are responsible for public facilities the project would construct, modify, or otherwise affect within or near the site.

5. Project Setting

a. Existing Land Uses

The project is located on land which is currently occupied by the campuses of Elim Elementary School and Hilmar High School. Public school facilities have been in place at the project site for several decades. Elim Elementary School was completed in 1936 and began operating in 1937; Hilmar Colony Union High School (the precursor to Hilmar High School) began operating at the site 1911, and the current Hilmar High School campus opened in 1957.

The project site encompasses approximately 15.5 acres located at the northwest corner of Geer Avenue and Pearl Street. A majority of the site consists of turfed recreational fields. The eastern part of the project site includes portions of the Elim Elementary Campus that are currently occupied by portable classrooms and hardcourt areas. The remainder of the site consists of vacant land, trees and landscaping, and existing access roads that serve the campus. Development adjacent to the project site includes Hilmar Unified school facilities to the north and west, single-family residences to the east, and agricultural and low-density residential uses to the south.

b. Public Land Use Policy

General Plan

The *2030 Merced County General Plan* (adopted December 10, 2013) guides land use policy for unincorporated areas within Merced County, including the Hilmar area. Hilmar is identified in the General Plan as an "Urban Community." Urban Communities are characterized in the General Plan as "unincorporated urban areas that have a range of housing densities, commercial uses, public infrastructure, services, and employment-generating land uses."

Urban Communities have five main purposes which are main components of the Urban Centered Concept:

- To ensure future growth occurs in an orderly and logical manner;
- To ensure land is used efficiently;
- To reduce the conversion of productive agricultural land to urban uses;
- To ensure the County's planning efforts are complementary to those of the cities; and
- To ensure future urban development occurs where adequate public infrastructure and services are available.

Each Urban Community has a boundary line, which is recognized as the ultimate growth boundary for the community over the life of the General Plan or the individual Community Plan (for reference, see Figure LU-1 of the 2030 Merced County General Plan). All land within an Urban Community is planned for eventual development in a mixture of urban and urban-related uses.

The General Plan's land use designation for the project site is Public/Quasi-Public use. This designation provides for a variety of public and quasi-public facilities and services, including but not limited to, schools, fire stations, hospitals, libraries, museums, government offices and courts, churches, meeting halls, cemeteries and mausoleums, and similar and compatible uses.

Hilmar Community Plan

The Hilmar Community Plan is a long-range vision and a land use strategy intended to guide growth and development for Hilmar through the Year 2025. The Community Plan is based on analysis of Hilmar's physical and environmental conditions, as well as extensive input from Hilmar's governing bodies and community-at-large. Serving as an implementation tool of the Merced County General Plan, the Community Plan refines and supplements the County-wide goals, objectives, policies, and implementation measures to specifically address the needs of Hilmar based on its physical, demographic, and economic characteristics.

The Hilmar Community Plan includes the following goals to facilitate execution of the vision established by the residents of Hilmar:

- Land Use – Create a pedestrian-oriented community that accommodates residential, business, and economic growth while maintaining a small-town atmosphere.
- Circulation – Provide a safe and efficient transportation network for vehicles, bicycles, pedestrians, and transit.
- Parks and Recreation – Establish and maintain public parks and recreational facilities suited for the needs of residents and visitors of Hilmar.
- Open Space and Conservation – Promote productivity and ensure continued viability of agricultural uses surrounding Hilmar, and preserve the biological, historical, and cultural resources in the Community.
- Noise – Keep residents free from harmful and annoying effects of excessive noise.
- Public Services – Provide for an efficient and self-sustaining system of public facilities and services including infrastructure, schools, and police and fire protection to accommodate the needs of current and future residents of the Community of Hilmar.

Like the Merced County General Plan, the Hilmar Community Plan designates the project site as "Public / Quasi Public Facility". Additionally, the Community Plan depicts the project site as the location for a future K-2 elementary school campus.

c. Zoning

The Merced County Zoning Map shows the project site is zoned "R-1" (Single Family Residential). The Merced County Zoning Ordinance describes the purpose of the R-1 Single-Family Residential Zone as providing "a full range of urban services and reserve appropriately located areas for single-family living with low population densities consistent with sound standards of public health, welfare, and safety." Public schools are identified as a by-right use in areas zoned R-1.

d. Transportation Network

Streets and Highways

The nearest existing streets to the project site are Geer Avenue and Pearl Street. Geer Avenue is an undivided two-lane Minor Collector roadway, and Pearl Street is a local street that runs for approximately 350 feet north of Geer Avenue before it joins Dayton Avenue (another local street). Other roadways near the project site include Lander Avenue/CA-165 (a two-lane Arterial roadway located to the east of the project site along the existing frontage of Elim Elementary School), Scholar Way (a local street located to the west along the frontage of Hilmar Junior High School), and a north-south access road located approximately 600 feet west of Pearl Street which serves the existing school sites.

Pedestrian Facilities

Currently, walkways exist in the vicinity of the project site along Lander Avenue, Echo Street, Dayton Avenue east of Lander Avenue, and the majority of the north side of Geer Avenue. There are also pedestrian walkways present at Hilmar Unified's existing school sites which provide connectivity within and among the District's facilities.

Bicycle Facilities

There are currently no bike lanes present along the project site. The Hilmar Community Plan identifies potential bike routes throughout the community, which include the following: Lander Avenue through the community of Hilmar as a Merced County Regional Bicycle Route, Echo Street between Lander Avenue and Camden Drive as a Class II Bicycle Route, Geer Avenue west of Lander Avenue as a Merced County Regional Bicycle Route, and Geer Avenue east of Lander Avenue as a Class II Bicycle Route.

Transit

Merced County's Regional Transit System, "The Bus", is the single public transportation service provider for all of Merced County. At present, no bus routes connect to the community of Hilmar. However, The Bus

offers curb-to-curb transit service through Paratransit to individuals that are eligible and have passed the approval process. Paratransit is open for service between 6:00 AM to 8:00 PM on Monday through Friday and 8:00 AM to 6:00 PM on Saturdays and Sundays. Expansion of future transit routes is dependent on transit ridership demand and available funding.

(For additional information regarding the transportation network, see the Traffic Impact Analysis, Initial Study Appendix 4.)

e. Public Utilities and Services

The Hilmar County Water District (Hilmar CWD) provides municipal water, sewer, and stormwater drainage services to the community of Hilmar. The Hilmar CWD operates a wastewater treatment plant located on Griffith Road east of Highway 165. Municipal water is supplied by groundwater wells. Stormwater runoff is currently discharged in the Turlock Irrigation District Lateral No. 7 (Hilmar Community Plan, p. 1-3). Existing sewer and water facilities are generally present at the project site as a result of prior development in the vicinity.

The Merced County Fire Department provides fire, rescue, and emergency medical services in Hilmar. Merced County Fire Station 95 is located at the corner of Falke Street and Lander Avenue/CA-165. The Merced County Fire Department staffs the fire station with a full-time fire captain, and emergency response is augmented with paid on-call firefighters.

The Merced County's Sheriff's Department provides law enforcement services in Hilmar. The department's C.F. Bullworth Station (North Station) in Delhi (approximately 5 miles) services the community of Hilmar.

The Merced County Regional Waste Authority owns and operates the two regional landfills within Merced County (the Billy Wright Landfill and the Highway 59 Landfill) and administers integrated waste management contracts on behalf of the member jurisdictions. Within the community of Hilmar, solid waste disposal services are provided by Winton Disposal/Waste Management.

6. Request for Preliminary Comment

Hilmar Unified School District distributed a Request for Preliminary Comment for the proposed school project to responsible, trustee and other agencies that might have an interest in the project. The Request for Preliminary Comment provided an opportunity for the agencies to comment on the potential environmental effects of the project, including whether an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration should be prepared for the project. The District also sent the Request for Preliminary Comment to residents and property owners in the project vicinity.

7. Other Public Agencies Whose Approval is Required

Implementation of the proposed school project would require approvals from the following public agencies:

- *California Department of Education, School Facilities Planning Division:* Review and approve proposed school site for conformance with applicable state rules and regulations governing the siting and development of public schools.
- *California Department of Toxic Substances Control:* Responsible for ensuring that the proposed school sites are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new schools. Review and approve compliance with Education Code sections 17213.1 and 17213.2.
- *County of Merced:* Review and approve the location, design, and construction of infrastructure improvements. Provide General Plan conformity review per Public Resources Code Section 21151.2 and Government Code Section 65402(c).
- *Hilmar County Water District:* Review and approve the location, design, and construction of water, sewer, and drainage improvements.

B. Environmental Factors Potentially Affected

Based on the evaluations in Part E, the project would have a less than significant impact on the environmental factors listed in the following table. Those factors that require mitigation to be incorporated into the project to be less than significant are noted with an "X".

TABLE B-1
Environmental Factors Potentially Affected

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

C. Determination

Based on this Initial Study, I find that the Hilmar Unified Elementary School Project could have significant effects on the environment, but mitigation measures incorporated in the project by the Hilmar Unified School District will avoid the effects or render them less than significant. Therefore, a Mitigated Negative Declaration is recommended for adoption.

Isabel Cabral-Johnson — 2-18-2021
Signature — Date

Isabel Cabral-Johnson — HUSD Superintendent
Print Name — Title

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D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G: Environmental Checklist Form

Part E in this Initial Study addresses all of the environmental issues that Appendix G of the State CEQA Guidelines[1] suggests an Initial Study should address. In addition, it addresses several environmental issues that the California Department of Education requires be considered in the selection and approval of a school site.

The discussion of each impact in Part E concludes with a determination that the impact is potentially significant, less than significant with mitigation, less than significant, or does not involve any impact (no impact).

The "potentially significant" determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. (sec. 15382) The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts.

The "less than significant impact with mitigation incorporated" determination applies when the incorporation by the District of mitigation measures in the project would reduce an impact from potentially significant to less than significant. This Initial Study describes each mitigation measure the District has incorporated in the project to reduce potentially significant impacts to a less than significant level.

The "less than significant" determination applies when the project would not result in a significant effect on a resource or condition. The less than significant determination used only in cases where no mitigation measures are required to reduce an impact to a less than significant level.

The "no impact" determination applies when the project would have no impact on a resource or condition, or the resource or condition does not apply to the project or its location.

The discussion of impacts in this Initial Study lists each potential impact as stated in Appendix G, provides an analysis of the impact, describes each mitigation measure required to avoid the impact or reduce it to an insignificant level, and concludes with a determination of the level of significance of the impact. References to documents that would provide background information on an impact are provided where applicable.

This Initial Study incorporates by reference all documents and other sources of information cited in Parts E and H, Sources Consulted.

2. Existing Laws, Regulations, Policies, and Mitigation Measures

Introduction: In some cases, an impact that might appear significant is determined to be less than significant because it is subject to state, regional, or local laws, regulations, or policies, the application of which would reduce the impact to a less than significant level or avoid the impact entirely. In evaluating impacts, this Initial Study considered the applicable laws, regulations, and policies to determine the effect they would have on preventing or reducing potentially significant impacts. The Initial Study, however, does not cite them as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study.

For the proposed project, applicable laws, regulations, and policies include but are not limited to the following:

[1] The most recent version of the State CEQA Guidelines and the Appendix G Checklist, which went into effect on December 28, 2018, can be viewed at the following URL: http://resources.ca.gov/ceqa/docs/2018_CEQA_FINAL_TEXT_122818.pdf

State of California: The selection and approval of a site for a public school in California is subject to numerous state rules and regulations, most of which the California Department of Education administers and protect the health and safety of students and staff at the school. Before the Department of Education will approve a school site and the school becomes eligible for state funding, a school district must certify that "the proposed site is suitable for educational purposes and is free, or will be free prior to occupancy, from hazards that could be considered harmful to student and staff health and safety. The school district has complied with and will comply with all applicable laws and policies associated with the acquisition of the school site, including commitments for Department of Toxic Substances Control required activities…" (SFPD 4.03, 2). The state requirements include but are not limited to the following:

- *Education Code Section 17210-17224:* Specifies the environmental review process the Department of Toxic Substance Control (DTSC) administers for new school sites. DTSC ensures that proposed school sites are free of contamination or, if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new school. All proposed school sites that will receive State funding for acquisition or construction are required to go through a rigorous environmental review and cleanup process under DTSC's oversight.
- *Education Code Section 17212.5; California Code of Regulations, Title 5, Section 14010 Geological and Other Environmental Hazards Report:* District must prepare a Geological Hazards Report and other environmental hazards report as described in Appendix H of the *School Site Selection and Approval Guide, 2000 Edition*. This will include a survey of high-pressure pipelines, liquid storage tanks, railroads, airports, electrical transmission lines, and areas subject to flooding, dam inundation, seismic faulting, and liquefaction.
- *Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011(h),(i); Title 14, Section 15093:* Requires District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. In addition, requires board-adopted findings for hazardous air emitters and hazardous material handlers located within one-quarter mile of the site.
- *Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1: airports:* Requires providing a notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway included in an airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site in relation to airport operations.
- *Public Resources Code Section 21151.2 and Government Code sections 53094, 65402(c):* Require consultation with local Planning Commission to determine conformity of proposed school site with the general plan (Note: Under these statutes, school districts can overrule city or county findings on general plan conformity and render the zoning ordinance inapplicable to school district property)
- *Public Resources Code Section 21151.4:* Addresses CEQA consultation requirements for the proposed construction or alteration of a facility within one-quarter mile of school that might reasonably be anticipated to emit or handling of hazardous or acutely hazardous material.
- *Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection:* The standards address: possible hazards related to power line easements, railroads, airports, major streets, above ground pipelines, underground pipelines, above ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.
- *Title 24, California Code of Regulations, Part 1 through Part 12:* Specifies the State of California building regulations for public schools. The Division of the State Architect (DSA) is responsible for administering the regulations.

San Joaquin Valley Air Pollution Control District
https://www.valleyair.org/rules/1ruleslist.htm

- Regulation VIII – Fugitive PM10 Prohibitions
- Regulation IX – Mobile and Indirect Sources

Merced County Department of Public Health, Division of Environmental Health
https://www.co.merced.ca.us/597/Environmental-Health

The Division of Environmental Health is responsible overseeing state-mandated CUPA/Hazmat programs, which include the following: Hazardous Materials Business Plan (HMBP), California Accidental Release Program (CalARP), Underground Storage Tank Program (UST), Aboveground Storage Tank Program (APSA), Hazardous Waste Generator Program, and Tiered Permitting Program. The division is also responsible for permitting and inspecting retail food businesses (including school cafeterias), reviewing construction plans and inspection of new and remodeled food facilities, investigating complaints regarding violations involving unsanitary conditions, investigating suspected food borne illnesses, etc.

County of Merced

- Merced County General Plan
- Merced County Zoning Code
- Hilmar Community Plan
- Merced County Improvement Standards and Specifications
- National Pollutant Discharge Elimination System (NPDES) Construction General Permit

Hilmar County Water District

- Hilmar County Water District Code
- Standards and Specifications

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E. Environmental Checklist

The questions in Part E, Sections 1-21, are from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts (as updated December 28, 2018).

1. Aesthetics

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

Except as provided in Public Resources Code Section 21099, would the project:

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

Less Than Significant Impact. The major scenic vistas within Merced County include views of both the Coast Range and the Sierra Nevada, and stream corridors of the Merced River, San Joaquin River, and Bear Creek (2030 Merced County General Plan EIR, p. 5-5). None of these features are located within the community of Hilmar, and the project would not diminish views of any of these identified scenic features due to its distance from these features and because its design characteristics (e.g., building height, size, and lighting) would be similar to development existing at the site and in the vicinity.

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

No Impact. There are no scenic highways located in the project vicinity, thus no impacts would result from the project.

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

Less Than Significant Impact. The visual setting at the project site and surrounding area consists of public-school facilities, single-family residences, agricultural uses, and vacant land. The proposed K-2 elementary school campus and related development would be visually compatible with both the existing school facilities at the site and surrounding residential development, as schools are typically a common and congruent visual feature within residential areas. The visual character of the development included in the project is consistent with common visual elements in a rural community setting and what exists and is planned for the project site and its vicinity. Although there are approximately 20 existing trees on the site which could be impacted by the project, these would be more than replaced by trees to be installed on the proposed campus. Additionally, the project would not conflict with any policies or regulations set forth in the Merced County General Plan, Merced County Zoning Code, or Hilmar Community Plan related to scenic quality. For these reasons, the impacts of the project regarding visual character and quality would be less than significant.

d. Create a new source of light and glare that would adversely affect day or nighttime views in the area?

Less Than Significant Impact with Mitigation Incorporated. Currently, light and glare are generated at the project site from exterior and interior lighting at the District's existing school facilities, as well as from headlights of vehicles arriving and departing the campuses during early morning and evening hours. Development of the project would be expected to incrementally increase these types of lighting and glare at the site. The potential project-related lighting and glare would not be unusual or excessive compared to existing conditions at the project site and its vicinity. However, to ensure that adjacent existing and future land uses are not significantly impacted, the following mitigation measure regarding lighting design will be incorporated in the project.

- **Mitigation Measure AE-1:** Mitigation for Lighting and Glare.

  The following measures shall be incorporated into development and operation of the project in order to reduce impacts from lighting and glare:

  a. All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.

  b. All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.

  c. Exterior building lighting for security or aesthetics shall be full cut-off or a shielded type design to minimize any upward distribution of light.

Level of Significance After Mitigation: With implementation of the recommended mitigation measure, impacts related to lighting and glare will be less than significant.

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2. Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?				✓
d. Result in the loss of forestland or conversion of forestland to non-forest use?				✓
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?			✓	

Would the project:

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

No Impact: The project would not convert any Farmland to non-agricultural use. The project site is located in an area urbanized area that. Per the California Important Farmland Finder, the site does not include any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Additionally, no agricultural-zoned areas or properties under Williamson Act contract are located at the project site.

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

No Impact: This impact is addressed in Section 2(a) above.

c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned timberland production?

No Impact: No impact would occur, as there are no forestland or timberland areas within the community of Hilmar or its vicinity.

d. Result in the loss of forestland or conversion of forestland to non-forest use?

No Impact: This impact is addressed in Section 2(c) above.

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

Less Than Significant Impact: As stated above in Section 2(a)-(d), the project site does not contain any areas of Farmland, agricultural-zoned areas, Williamson Act-contracted land, or forest areas. The project site is located on an area of District-owned land that has already been in use for public school facility purposes, and the project is surrounded on three sides by other school facilities and single-family residential development. While there are areas of Farmland and operating agricultural uses located to the south of the project site, these areas and the school facilities have coexisted for over 50 years. Although the project may result in more intensified urban use of the project site than what currently exists, the project is not anticipated to change the existing environment to a degree that would cause a conversion of Farmland to non-agricultural use. Further, the project is consistent with the land use designation and urban development boundary presented in Merced County's Specific Urban Development Plan established for the community of Hilmar.

3. Air Quality

This section is based on an Air Quality Analysis completed for the project (Ambient 2020, included as Appendix 1 of the Initial Study). Table 3-1 provides definitions for the air quality terms used in this section.

TABLE 3-1
Air Quality Definitions

Carbon Monoxide (CO)

A colorless, odorless gas resulting from the incomplete combustion of hydrocarbon fuels. CO interferes with the blood's ability to carry oxygen to the body's tissues and results in numerous adverse health effects. Over 80 percent of the CO emitted in urban areas is contributed by motor vehicles. CO is a criteria air pollutant.

Nitrogen Oxides (Oxides of Nitrogen, NO_X)

A general term pertaining to compounds of nitric oxide (NO), nitrogen dioxide (NO_2) and other oxides of nitrogen. Nitrogen oxides are typically created during combustion processes and are major contributors to smog formation and acid deposition. NO2 is a criteria air pollutant and may result in numerous adverse health effects.

Particulate Matter (PM)

Any material, except pure water, that exists in the solid or liquid state in the atmosphere. The size of particulate matter can vary from coarse, wind-blown dust particles to fine particle combustion products.

$PM_{2.5}$

Includes tiny particles with an aerodynamic diameter less than or equal to a nominal 2.5 microns. This fraction of particulate matter penetrates most deeply into the lungs.

PM_{10}

A criteria air pollutant consisting of small particles with an aerodynamic diameter less than or equal to a nominal 10 microns (about 1/7 the diameter of a single human hair). Their small size allows them to make their way to the air sacs deep within the lungs where they may be deposited and result in adverse health effects. PM10 also causes visibility reduction.

Reactive Organic Gas (ROG)

A photochemically reactive chemical gas, composed of non-methane hydrocarbons, that may contribute to the formation of smog. Also, sometimes referred to as Non-Methane Organic Gases (NMOGs). (See also Volatile and Hydrocarbons.)

Sulfur Dioxide (SO_2)

A strong smelling, colorless gas that is formed by the combustion of fossil fuels. Power plants, which may use coal or oil high in sulfur content, can be major sources of SO_2 and other sulfur oxides contribute to the problem of acid deposition. SO_2 is a criteria air pollutant.

Source: California Air Resources Board. *Glossary of Air Pollution Terms* (2015)

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?		✓		
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality?			✓	
c. Expose sensitive receptors to substantial pollutant concentrations?		✓		
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			✓	

Would the project:

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

Less Than Significant Impact with Mitigation Incorporated. In accordance with San Joaquin Valley Air Pollution Control District (SJVAPCD)-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. As noted in Section 3(b) below, short-term construction and long-term operational emissions would not exceed applicable thresholds. In addition, the proposed project's contribution to localized concentrations of emissions, including emissions of CO, TACs, and odors, are considered less than significant. However, as noted in Section 3(c), the proposed project could result in a significant contribution to localized PM concentrations for which the SJVAB is currently designated non-attainment. For this reason, implementation of the proposed project could conflict with air quality attainment or maintenance planning efforts. This impact would be considered potentially significant. Refer to Section 3(b) and 3(c) for additional discussion of air quality impacts.

Mitigation Measure: Implement Mitigation Measures AQ-1 through AQ-9 (refer to Section 3(c) below)

Level of Significance after Mitigation: With mitigation, short-term construction activities would be required to comply with SJVPACD Regulation VIII (Fugitive PM10 Prohibitions). Mandatory compliance with SJVAPCD Regulation VIII would reduce emissions of fugitive dust from the project site and minimize the project's potential to adversely affect nearby sensitive receptors. Compliance with SJVAPCD Regulation VIII would reduce fugitive emissions of PM by approximately 50 percent, or more. Additional measures have also been included to minimize emissions generated by onsite equipment and vehicles. With mitigation, this impact would be considered less than significant.

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

Less Than Significant Impact. The proposed project is located in Merced County, which is within the San Joaquin Valley Air Basin (SJVAB). The SJVAB is currently designated as a nonattainment area with respect to the state PM10 standard, PM2.5 standard, and ozone. The SJVAB is designated nonattainment for the national 8-hour ozone and PM2.5 standards (SJVAPCD 2019). Potential air quality impacts associated with

the proposed project could potentially occur during project construction or operational phases. Short-term construction and long-term air quality impacts associated with the proposed project are discussed, as follows:

Short-term Construction Emissions

Short-term increases in emissions would occur during the construction process. Construction-generated emissions are of temporary duration, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. The construction of the proposed project would result in the temporary generation of emissions associated with site grading and excavation, paving, motor vehicle exhaust associated with construction equipment and worker trips; as well as, the movement of construction equipment on unpaved surfaces. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NO_X) and emissions of PM. Emissions of ozone-precursors would result from the operation of on-road and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site preparation activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses.

Short-term construction emissions associated with the proposed project were calculated using the CalEEMod computer program[2]. Emissions were quantified for site preparation, grading, asphalt paving, facility construction, and application of architectural coatings. Detailed construction information, including construction schedules and equipment requirements, have not been identified for the proposed project. Default construction phases and equipment assumptions contained in the CalEEMod model were, therefore, relied upon for the calculation of construction-generated emissions. Off-site mobile source emissions were adjusted in accordance with ARB's EMFAC off-model adjustment factors to account for the SAFE Vehicle Rule (ARB 2020b). Modeling assumptions and output files are included in Appendix A of the Air Quality and Greenhouse Gas Impact Analysis (Initial Study Appendix 1).

Estimated annual and daily construction-generated emissions are discussed in greater detail, as follows:

Annual Construction Emissions

Estimated construction-generated annual emissions associated with the proposed project alternatives are summarized in Table 3-2. The proposed project would generate maximum uncontrolled annual emissions of approximately 0.2 tons/year of ROG, 1.9 tons/year of NO_X, 1.9 tons/year of CO, 0.3 tons/year of PM_{10}, and 0.2 tons/year of $PM_{2.5}$. Emissions of SO_2 would be negligible (i.e., less than 0.1 tons/year). Estimated construction-generated emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NO_X, or 15 tons/year of PM_{10} or $PM_{2.5}$.

Table 3-2
Annual Construction Emissions

Construction Phase	Uncontrolled Maximum Annual Emissions (TPY)[1]					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Construction Year 1 (Year 2022)	0.2	1.9	1.9	<0.1	0.3	0.2
Construction Year 2 (Year 2023)	0.2	0.4	0.11	<0.1	<0.1	<0.1
Maximum Annual Emissions:	0.2	1.9	1.9	<0.1	0.3	0.2
Significance Thresholds:	10	10	100	27	15	15
Exceeds Thresholds/ Significant Impact?	No	No	No	No	No	No

1. Based on CalEEMod computer modeling. Totals may not sum due to rounding. Includes EMFAC off-model adjustment factors to account for SAFE Vehicle Rule (ARB 2020b). Does not include emission control measures. Source: Ambient 2020

[2] Modeling assumptions and output files from CalEEMod Version 2016.3.2 for the project are included in Appendix A of the Air Quality and Greenhouse Gas Analysis (Initial Study Appendix 1).

Daily Construction Emissions

Estimated average-daily construction emissions are summarized in Table 3-3. The proposed project would generate maximum uncontrolled average-daily emissions of approximately 14.7 lbs/day of ROG, 34.1 lbs/day of NO_X, 34.0lbs/day of CO, 19.8 lbs/day of PM_{10}, and 11.5 lbs/day of $PM_{2.5}$. Emissions of SO_2 would be negligible (i.e., less than 0.1 lbs/day). Estimated average-daily on-site construction emissions would not exceed the SJVAPCD's significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated.

Table 3-3
Daily On-Site Construction Emissions

Construction Phase	Uncontrolled Daily Emissions (lbs/day)[1]					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Site Preparation	3.3	33.1	20.2	<0.1	19.8	11.5
Grading	2.0	20.9	15.7	<0.1	7.6	4.3
Building Construction – Year 1	1.8	16.5	17.1	<0.1	1.0	0.8
Building Construction – Year 2	1.7	15.1	16.9	<0.1	0.9	0.7
Paving	1.1	10.2	15.0	<0.1	0.6	0.5
Architectural Coating	11.8	1.3	2.0	<0.1	0.1	0.1
Maximum Annual Emissions:	14.7	33.1	34.1	<0.1	19.8	11.5
Significance Thresholds:	100	100	100	100	100	100
Exceeds Thresholds/ Significant Impact?	No	No	No	No	No	No

1. Based on CalEEMod computer modeling. Totals may not sum due to rounding. Includes EMFAC off-model adjustment factors to account for SAFE Vehicle Rule (ARB 2020b). Does not include emission control measures, including dust control per Regulation VIII.

2. Average daily on-site emissions are based on total on-site emissions divided by the total number of construction days.

3. Maximum daily on-site emissions assumes building construction, paving, and architectural coating application could potentially occur simultaneously.

Source: Ambient 2020

Short-term construction of the proposed project would not result in a significant impact to regional or local air quality conditions. Furthermore, it is important to note that project construction, including RAW excavation and grading activities, would be required to comply with SJVPACD Regulation VIII (Fugitive PM10 Prohibitions). Mandatory compliance with SJVAPCD Regulation VIII would further reduce emissions of fugitive dust from the project site and minimize the project's potential to adversely affect nearby sensitive receptors. With compliance with SJVAPCD Regulation VIII, emissions of PM would be reduced by approximately 50 percent, or more. Given that project-generated emissions would not exceed applicable SJVAPCD significance thresholds, this impact would be considered less than significant.

Long-term Operational Emissions

Long-term operational emissions of criteria air pollutants associated with the proposed project were calculated using the CalEEMod computer program. Modeling was conducted based on traffic data derived, in part, from the Traffic Impact Analysis prepared for the proposed project (JLB 2020). Mobile source emissions were conservatively based on the default fleet distribution assumptions contained in the model. All other modeling assumptions were based on the default parameters contained in the CalEEMod computer model[3]. Off-site mobile source emissions were adjusted in accordance with ARB's EMFAC off-model adjustment factors to account for the SAFE Vehicle Rule (ARB 2020b). Modeling assumptions and output files are included in Appendix A of the Air Quality and Greenhouse Gas Impact Analysis (Initial Study

[3] Modeling assumptions and output files from CalEEMod Version 2016.3.2 for the project are included in Appendix A of the Air Quality and Greenhouse Gas Analysis (Initial Study Appendix 1).

Appendix 1). Exposure to localized pollutant concentrations, including fugitive dust, mobile source CO, and odors were qualitatively assessed.

Estimated annual operational emissions for the proposed project are summarized in Table 3-4. As depicted, the proposed project would generate approximately 0.7 tons/year of ROG, 4.3 tons/year of NOx, 3.3 tons/year of CO, 0.8 tons/year of PM10, and 0.3 tons/year of PM2.5. Operational emissions of SO_2 would be negligible (i.e., less than 0.1 tons/year). Operational emissions would be projected to decline in future years, with improvements in fuel-consumption emissions standards. Operational emissions would not exceed SJVAPCD's mass-emissions significance thresholds.

Estimated average-daily on-site operational emissions are also summarized in Table 3-4. Average-daily on-site operational emissions would be largely associated with area sources (e.g., landscape maintenance activities and use of consumer products) and the use of natural-gas fired appliances. Average-daily on-site emissions of ROG would total approximately 1.9 lbs/day. Average-daily on-site emissions of other pollutants would be negligible (i.e., less than 0.1 lbs/day). Average-daily on-site emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated.

Table 3-4
Long-Term Operational Emissions (Unmitigated)

Season	Uncontrolled Daily Emissions (tons/year)[1]					
	ROG	NOx	CO	SO_2	PM_{10}	$PM_{2.5}$
Area Sources	0.2	<0.1	<0.1	0.0	<0.1	<0.1
Energy Use	<0.1	0.1	0.1	<0.1	<0.1	<0.1
Mobile Source[2]	0.1	0.8	0.5	<0.1	0.1	<0.1
Total:	0.3	0.9	0.6	<0.1	0.1	<0.1
Significance Thresholds (tons):	10	10	100	27	15	15
Exceeds Thresholds/ Significant Impact?	No	No	No	No	No	No
Average Daily On-site Emissions (lbs)[3]:	1.9	<0.1	<0.1	<0.1	<0.1	<0.1
Significance Thresholds (lbs):	100	100	100	100	100	100
Exceeds Thresholds/ Significant Impact?	No	No	No	No	No	No

1. Emissions were calculated using the CalEEMod computer program. Does not include implementation of emissions control measures.

2. Fleet distribution data for the project is not available. Mobile source emissions are conservatively based on default vehicle fleet distribution for Merced County, which includes all vehicle types/classifications, including medium and heavy-duty vehicles. Given that a majority of project emissions would be associated with light-duty vehicles, actual emissions would likely be lower. Includes EMFAC off-model adjustment factors to account for SAFE Vehicle Rule (ARB 2020b).

3. Based on calculated annual operational emissions from area sources and an average of 240 operational days annually.

Totals may not sum due to rounding.

Source: Ambient 2020

Long-term operation of the proposed project would not result in a significant impact to regional or local air quality conditions. It is important to note that estimated operational emissions are conservatively based on the default vehicle fleet distribution assumptions contained in the model, which include contributions from medium and heavy-duty trucks. Mobile sources associated with schools typically consist predominantly of

light-duty vehicles. As a result, actual operational emissions would likely be slightly less than indicated. This impact is therefore considered less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. Nearby sensitive land uses consist predominantly of residential land uses. The nearest residential land uses are generally located to the east and south of the project site. Long-term operational and short-term construction activities and emission sources that could adversely impact these nearest sensitive receptors are discussed, as follows:

Short-term Construction

Naturally Occurring Asbestos

Naturally-occurring asbestos, which was identified by Air Resources Board (ARB) as a Toxic Air Contaminant (TAC) in 1986, is located in many parts of California and is commonly associated with ultramafic rock. The project site is not located near any areas that are likely to contain ultramafic rock (DOC 2000). As a result, risk of exposure to asbestos during the construction process would be considered less than significant.

Diesel-Exhaust Emissions

Implementation of the proposed project would result in the generation of Diesel Particulate Matter (DPM) emissions during construction associated with the use of off-road diesel equipment for site grading and excavation, paving, and other construction activities. Health-related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. For residential land uses, the calculation of cancer risk associated with exposure of to TACs are typically calculated based on a 25 to 30- year period of exposure. The use of diesel-powered construction equipment, however, would be temporary and episodic and would occur over a relatively large area. Assuming that construction activities involving the use of diesel-fueled equipment would occur over an approximate 12-month period, project-related construction activities would constitute less than six percent of the typical exposure period. As a result, exposure to construction-generated DPM would not be anticipated to exceed applicable thresholds (i.e., incremental increase in cancer risk of 20 in one million). For these reasons, this impact would be considered less than significant.

Localized PM Concentrations

Fugitive dust emissions would be primarily associated with site preparation activities, activities, including grading, excavation, and construction-related vehicle travel on unpaved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of diesel-exhaust PM, which could contribute to elevated localized concentration at nearby receptors. Uncontrolled emissions of fugitive dust may also contribute to increased occurrences of Valley Fever and potential increases in nuisance impacts to nearby receptors. For these reasons, localized uncontrolled concentrations of construction-generated PM would be considered to have a potentially significant impact.

Mitigation Measures AQ-1 through AQ-8: Measures to Reduce Localized Pollutant Concentrations.

The following measures shall be implemented to reduce potential expose of sensitive receptors to localized concentrations of construction-generated PM at nearby sensitive receptors and land uses during project construction. The term "construction" as used here shall refer broadly to pre-operational site preparation activities (e.g., excavation and grading).

AQ-1. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,

b. Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than

5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

AQ-2. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use Off-road Diesel regulation. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and ww.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

AQ-3. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's five-minute idling limit.

AQ-4. To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents.

AQ-5. Construction truck trips shall be scheduled, to the extent possible, to occur during non-peak hours.

AQ-6. The burning of vegetative material shall be prohibited.

AQ-7. Low VOC-content (50 grams per liter, or less) exterior and interior building paints shall be used. To the extent locally available, use prefinished/pre-colored building construction components and materials.

AQ-8. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL: https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented:

a. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.

b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

c. All land clearing, grubbing, scraping, excavation, land leveling, grading, and cut & fill activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

d. When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.

e. Trackout shall be immediately removed when it extends 50 or more feet from the site and at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden.)

f. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

g. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.

h. Sandbags or other erosion control measures shall be installed sufficient to prevent silt runoff to public roadways from sites with a slope greater than one percent.

i. Excavation and grading activities shall be suspended when winds exceed sustained speeds of 20 miles per hour (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

AQ-9. The above measures for the control of construction-generated emissions shall be included on site grading and construction plans.

Level of Significance after Mitigation: Implementation of the mitigation measures listed above include measures to reduce construction-generated emissions that could contribute to increases in localized pollutant concentrations at nearby sensitive receptors. These measures include SJVAPCD-recommended

measures, which would help to ensure compliance with applicable SJVAPCD rules and regulations. With mitigation, this impact would be considered less than significant.

Long-term Operation

Localized Mobile-Source CO Emissions

Carbon monoxide is the primary criteria air pollutant of local concern associated with the proposed project. Under specific meteorological and operational conditions, such as near areas of heavily congested vehicle traffic, CO concentrations may reach unhealthy levels. If inhaled, CO can be absorbed easily by the blood stream and can inhibit oxygen delivery to the body, which can cause significant health effects ranging from slight headaches to death. The most serious effects are felt by individuals susceptible to oxygen deficiencies, including people with anemia and those suffering from chronic lung or heart disease.

Mobile-source emissions of CO are a direct function of traffic volume, speed, and delay. Transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. For this reason, modeling of mobile-source CO concentrations is typically recommended for sensitive land uses located near signalized roadway intersections that are projected to operate at unacceptable levels of service (i.e., LOS E or F). Localized CO concentrations associated with the proposed project would be considered less-than-significant impact if: 1) traffic generated by the proposed project would not result in deterioration of a signalized intersection to LOS E or F; or 2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS E or F.

With implementation of the proposed traffic improvements, intersections in the project area are projected to operate at LOS D, or better, for existing-plus-project, near-term, and future cumulative conditions (JLB 2020). In comparison to the CO screening criteria, implementation of the proposed project would not result in or contribute to unacceptable levels of service (i.e., LOS E, or worse) at nearby signalized intersections. As a result, the proposed project would not be anticipated to contribute substantially to localized CO concentrations that would exceed applicable standards. For this reason, this impact would be considered less than significant.

Toxic Air Contaminants

Implementation of the proposed project would not result in the long-term operation of any major onsite stationary sources of TACs, nor would project implementation result in a significant increase in diesel-fueled vehicles traveling along area roadways. No major stationary sources of TACs were identified in the project vicinity that would result in increased exposure of students or staff to TACs. For these reasons, long-term increases in exposure to TACs would be considered less than significant.

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

Less Than Significant Impact. Other emissions potentially associated with the proposed project would be predominantly associated to the generation of odors during project construction. The occurrence and severity of odor impacts depends on numerous factors, including: the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies.

Construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes. Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings and architectural coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly within increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. In addition, no major sources of odors have been identified in the project area. This impact would be considered less than significant.

4. Biological Resources

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

Would the project:

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

Less Than Significant Impact with Mitigation Incorporated. According to the 2030 Merced County General Plan EIR's Summary of Impacts to Sensitive Biological Resources within Merced County, the community of Hilmar does not contain any known special status species or designated critical habitat (see p. 8-16, Merced County General Plan Draft EIR). Additionally, a search of the California Natural Diversity Database (CNDDB)

using CDFW's BIOS Viewer did not identify any sensitive species, or habitat of such species, located the project site or within the community of Hilmar.

The project site is located within a developed area that has been occupied with public school facilities for over 60 years. Such land is of limited habitat value for sensitive plant and wildlife species due to the amount of disturbance from humans and vehicles on a regular basis. However, given the presence of established trees and vegetation, migratory birds could be nesting on the project site and vicinity, most of which are protected by the Migratory Bird Treaty Act (USCA 1918). Burrowing owls, a special status species that nests in ground burrows, could also potentially nest on the site. Construction-related disturbance could result in nest abandonment or direct mortality of eggs, chicks, and/or fledglings. To avoid potential impacts to nesting migratory birds, Mitigation Measure BR-1 has been incorporated into the project.

Mitigation Measure BR-1: Mitigation for Potential Impacts to Nesting Birds

- **BR-1:** The following shall be implemented to avoid potential impacts related to nesting birds:

  1. Avoidance: If feasible, any vegetation removal within the project area shall take place between September 1 and February 1 to avoid impacts to nesting birds in compliance with the Migratory Bird Treaty Act (MBTA). No surveys will be required if project timing occurs outside the bird nesting season. If vegetation removal must occur during the nesting season, project construction may be delayed due to actively nesting birds and their required protective buffers.

  2. Pre-construction Surveys:

  a. If construction is to begin during the nesting season (February 1 through August 31), a qualified biologist shall conduct a pre-construction survey within 14 days prior to initiation of disturbance activities. This survey will search for nest sites within the project area.

  b. Surveys for burrowing owl will occur within 14 days prior to any ground disturbance, no matter the season. This survey will cover potential burrowing owl burrows in the project area and suitable habitat within 150 m (500 ft). Evaluation of use by owls shall be in accordance with California Department of Fish and Wildlife survey guidelines (CBOC 1993, CDFG 1995, CDFG 2012). Surveys will document if burrowing owls are nesting or using habitat in or directly adjacent to the project area. Survey results will be valid only for the season (breeding (Feb 1-Aug 31) or non-breeding (Sept 1-Jan 31) during which the survey is conducted.

  c. If the pre-construction survey does not detect any active nests or burrows, then no further action is required. If the survey does detect an active nest or burrow, then the District shall implement the following mitigation measures.

  3. Minimization/Establish Buffers:

  a. If any active nests are discovered, the District shall contact the United States Fish and Wildlife Service and/or California Department of Fish and Wildlife to determine protective measures required to avoid take. These measures could include fencing an area where a nest occurs or shifting construction work temporally or spatially away from the nesting birds. Biologists would be required on site to monitor construction activity while protected migratory birds are nesting in the project area. If an active nest is found after the completion of the pre-construction surveys and after construction begins, all construction activities shall stop until a qualified biologist has evaluated the nest and erected the appropriate buffer around the nest.

  b. If burrowing owls are detected within the survey area, CDFW will be consulted to determine the suitable buffer. These buffers will consider the level of disturbance of the project activity, existing disturbance of the site (vehicle traffic, humans, pets, etc.), and time of year (nesting vs. wintering). If avoidance is not feasible, the District will work with CDFW to determine appropriate mitigation, such as passive exclusion or translocation, and associated mitigation land offset (CDFG 2012).

Level of Significance After Mitigation: Compliance with the recommended mitigation measures would reduce the project's potential to adversely affect nesting birds to a less than significant level.

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

No Impact. There would be no potential impact to riparian habitat or other sensitive natural communities. There are no riparian or sensitive natural communities within the project site or its immediate vicinity. The nearest such community, the Merced River, is located approximately 1.5 miles southeast of the project site and is thus not at risk for substantial adverse impact due to distance.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. There are no federally protected wetlands within the project area. Implementation of typical ground disturbance and erosion control Best Management Practices (BMPs) and compliance with grading permits will ensure that there is no impact to storm drainage facilities or nearby canals.

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

Less Than Significant Impact. The project will not result in impacts that substantially interfere with wildlife movements. The site does not appear to constitute a "movement corridor" for native wildlife (USFWS 1998) that would attract wildlife to move through the site. As discussed above, the project is located on a heavily disturbed site in a highly urbanized area. The project site is bordered by busy arterial and residential streets, a condition which restricts access for wildlife. Smaller wildlife species and birds are not expected to be further inhibited by the project as compared with existing development and uses.

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

No impact. The project would not conflict with local policies or ordinances protecting biological resources.

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

No impact. The community of Hilmar is not located within the boundaries of any Habitat Conservation Plan or Natural Conservation Community Plan, so the project would not conflict any provisions of any local, regional, or state habitat conservation plan.

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5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?		✓		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?		✓		
c. Disturb any human remains, including those interred outside of formal cemeteries?		✓		

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. The project is located on an area currently utilized by Hilmar Unified as part of its operations at Hilmar High School and Elim Elementary School sites. As mentioned in the Project Background Information (Part A, Section 5(a)), the existing Elim Elementary campus has been in operation at the project area for over 80 years, and utilization of the project area for school facilities dates back even further in time. As such, the site has been heavily disturbed in prior years.

The project's development would entail pre-operational site preparation activities (e.g., excavation, grading, paving, and relocation of portables) which could potentially impact known and/or undiscovered historical resources. Operational activities entailed in the project would be consistent with the existing school site operations and not include site disturbing activities.

During preparation of this Initial Study, project information was distributed to the Central California Information Center (CCIC) for review and comment regarding potential impacts to cultural resources. CCIC conducted a Cultural Resources Records Search for the project, which consisted of searching the National Register of Historic Places, the Historic Property Directory, the California Register of Historic Places, the California Points of Historical Interest, the California Inventory of Historic Resources, and the California State Historic Landmarks. Per the response letter provided by CCIC, there are no formally recorded prehistoric or historic archaeological resources or historic buildings or structures within the specific project area or its immediate vicinity, and no previous investigations within the project area have been formally reported to the Information Center. The response letter indicates the project area has a moderate sensitivity for the possible discovery of prehistoric or historical resources, as the area was occupied in the historic era and the project is within the occupation and utilization area for Native Americans in association with the Merced River resource exploitation zone, and recommended consulting with the state Native American Heritage Commission (NAHC). Additionally, the response letter noted there may be unidentified features involved in the project that are 45 years or older and considered as historical resources requiring further evaluation for historical significance by a qualified professional consultant prior to alteration and/or demolition.

During preparation of this Initial Study, the District contacted the Native American Heritage Commission (NAHC) in order to request a Native American Contacts List and Sacred Lands File record search for the

project site area. The NAHC's response letter indicated the results of the Sacred Lands File record search were negative.

While the project would involve removal of existing portable buildings as well as reorienting the Elim Campus toward the new interior access road, the project does not include demolition or alteration of any structures either designated or eligible for designation as historic resources.

Development of the project, particularly site preparation activities (e.g., excavation and grading), could potentially impact yet-to-be-discovered archaeological or other subsurface resources within the project site area. To avoid impacts to possible subsurface cultural resources, mitigation measures have been provided which will require intervention by a qualified cultural resources specialist in the event subsurface resources are encountered.

Mitigation Measures CR-1 and CR-2: Mitigation for Potential Discovery of Subsurface Resources

- **CR-1:** If cultural resources are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the qualified cultural resources specialist shall make recommendations to the Lead Agency on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2.
- **CR-2**: If human remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.

Level of Significance After Mitigation: With incorporation of the proposed mitigation measures, the project's potential impact to subsurface cultural resources will be less than significant.

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Guidelines Section 15064.5?

Less Than Significant Impact with Mitigation Incorporated. This impact is addressed in Section 5(a) above.

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

Less Than Significant Impact with Mitigation Incorporated. This impact is addressed in Section 5(a) above.

6. Energy

A technical analysis of energy resource consumption was conducted for the project (Ambient 2020; Appendix 2 of this Initial Study).

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

Would the project:

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

Less Than Significant Impact. Implementation of the proposed project would increase electricity, diesel, gasoline, and natural gas consumption associated with construction activities, as well as long-term operational activities. Energy consumption associated with short-term construction and long-term operational activities are discussed in greater detail, as follows:

Construction-Related Energy Consumption

Energy consumption would occur during construction of the proposed facilities, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. Table 6-1 summarizes the levels of energy consumption associated with project construction. As depicted, operation of off-road construction equipment would use an estimated total of 33,446 gallons of diesel fuel. On-road vehicles would use approximately 2,359 gallons of gasoline and 505 gallons of diesel fuel. In total, fuel use would equate to approximately 4,948 million British thermal units per year (MMBU) over the life of the construction project. Construction equipment use and associated energy consumption would be typical of that commonly associated with the construction of new land uses. As a result, project construction would not be anticipated to require the use of construction equipment that would be less energy efficient than those commonly used for the construction of similar facilities. Idling of on-site equipment during construction would be limited to no more than five minutes in accordance with applicable state and San Joaquin Valley Air Pollution Control District (SJVAPCD) requirements. Furthermore, on-site construction equipment may include alternatively-fueled vehicles (e.g., natural gas) where feasible. Energy use associated with construction of the proposed facilities would be temporary and would not be anticipated to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. As a result, the construction of proposed facilities and improvements would not result in an inefficient, wasteful, or unnecessary consumption of energy. As a result, impacts are considered less than significant.

Table 6-1
Construction Energy Consumption

Source	Total Fuel Use (gallons)	Total MMBTU
Off-Road Equipment Use (Diesel)	33,446	4,595
On-Road Vehicles (Gasoline)	2,359	284
On-Road Vehicles (Diesel)	505	69
	Total:	4,948

Fuel use was calculated based, in part, on default construction schedules, equipment use, and vehicle trips identified in the CalEEMod output files prepared for the Air Quality Analysis conducted for this project. Refer to Appendix A of Initial Study Appendix 2 for modeling assumptions and results.

Source: Ambient 2020

Operational Mobile-Source Energy Consumption

Operational mobile-source energy consumption would be primarily associated with commute trips to and from the project site. Table 6-2 summarizes the net increases in fuel use at build-out of the proposed land uses. As depicted, the proposed land uses would consume an estimated 8,504 gallons/year of diesel fuel and an estimated 10,036 gallons/year of gasoline. In total, fuel use would equate to approximately 2,376 MMBU/year. However, a large majority of the estimated fuel use would be associated with the use of personal vehicles for the transport of students. The operation of HUSD-owned vehicles would comply with applicable regulatory requirements, including state requirements to limit idling periods for diesel-fueled buses. As a result, the proposed project would not result in increased fuel usage that would be considered unnecessary, inefficient, or wasteful. This impact would be considered less than significant.

Table 6-2
Operational Fuel Consumption

Source	Total Fuel Use (gallons)	Total MMBTU
On-Road Vehicles (Gasoline)	8,504	1,168
On-Road Vehicles (Diesel)	10,036	1,208
	Total:	2,376

Fuel use was calculated based, in part, on VMT data for the proposed land uses derived from CalEEMod. Refer to Appendix A of Initial Study Appendix 2 for modeling assumptions and results.

Source: Ambient 2020

Operational Building-Use Energy Consumption

The proposed project would result in increased electricity and natural gas consumption associated with the long-term operation of the proposed land uses. It is important to note that the proposed buildings would be required to comply with Title 24 standards for energy-efficiency, which would include increased building insulation and energy-efficiency requirements, including the use of energy-efficient lighting, energy-efficient appliances, and use of low-flow water fixtures.

Estimated electricity and natural gas consumption associated with proposed facilities to be constructed as part of the proposed project are summarized in Table 6-3. As depicted, new facilities at build-out would result in the consumption of approximately 250,202 kilowatt hours per year (kWh/year) of electricity and approximately 1,250,630 kilo British thermal units per year (kBTU/year) of natural gas. In total, the proposed facilities would use consume a total of approximately 2,104 MMBTU/year. The proposed project would comply with the most current building energy-efficient standards (i.e., Title 24), which would result in increased building energy efficiency and energy conservation as well as reductions in water use and waste generation. In comparison to the previously adopted 2016 building energy-efficient standards, compliance with current 2019 building standards is anticipated to reduce energy use by approximately 30 percent. For this reason, implementation of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy. As a result, this impact would be considered less than significant.

Table 6-3
Operational Electricity and Natural Gas Consumption

Source	Energy Use	MMBTU/year
Electricity Consumption	244,747 (kWh/year)	835
Water Use, Treatment, and Conveyance	2,359 (kWh/year)	284
Total Electricity Consumption:	250,202 (kWh/year)	854
Natural Gas Use	1,250,630 (kBTU/year)	1,251
	Total:	2,104

Energy use was calculated based, in part, on default usage rates identified in the CalEEMod output files prepared for the Air Quality Analysis conducted for this project. Refer to Appendix A of Initial Study Appendix 2 for modeling assumptions and results.

Source: Ambient 2020

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

Less Than Significant Impact. As discussed in Section 6(a), the proposed land uses would consume an estimated 8,504 gallons/year of diesel fuel and an estimated 10,036 gallons/year of gasoline. However, a large majority of the estimated fuel use would be associated with the use of personal vehicles for the transport of students. The operation of HUSD-owned vehicles would comply with applicable regulatory requirements, including state requirements to limit idling periods for diesel-fueled buses. As a result, the proposed project would not result in increased fuel usage that would be considered unnecessary, inefficient, or wasteful. This impact would be considered less than significant. As a result, the proposed

project would not result in increased fuel usage that would be anticipated to conflict with applicable plans, policies, or regulations adopted for the purpose of reducing future fuel consumption rates.

The proposed project would comply with the most current building energy-efficient standards (i.e., Title 24), which would result in increased building energy efficiency and energy conservation; as well as, reductions in water use and waste generation. In comparison to the previously adopted 2016 building energy-efficient standards, compliance with current 2019 building standards is anticipated to reduce building energy use by approximately 30 percent. It is also important to note a majority of the students served by the proposed project, roughly 67 percent, already attend the adjacent existing Elim Elementary School. For this reason and given that a majority of the fuel use associated with the proposed project would be associated with existing student-related commute trips, implementation of the project is not anticipated to result in a substantial increase in fuel use that would conflict with applicable regulatory requirements or plans related to fuel conservation. For these reasons, implementation of the proposed project would not result in wasteful, inefficient, and unnecessary consumption of energy that would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing energy use and fuel consumption. As a result, this impact would be considered less than significant.

7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
(i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			✓	
(ii) strong seismic ground shaking?			✓	
(iii) seismic-related ground failure, including liquefaction?			✓	
(iv) landslides?			✓	
b. Result in substantial soil erosion or the loss of topsoil?			✓	
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			✓	

d. Be located on expansive soil, as defined in Table 18-a-B of the Uniform Building Code (1994), creating substantial risks to life or property?			✓	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✓
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		✓		

Would the project:

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

iii. Seismic-related ground failure, including liquefaction?

iv. Landslides?

Less Than Significant Impact. The 2030 Merced County General Plan EIR (November 2012) includes information and analysis related to geologic and soils conditions throughout Merced County, including the community of Hilmar and the project site. The analysis and conclusions for geologic and soils conditions include the following:

Earthquakes and Faults

In general, risks related to seismic hazards within Merced County are low due to the large distance between populated and developed areas of the County and faults adjacent to the county lines. The nearest active and significant faults to Merced County are the San Andreas Fault approximately 15 miles west of the county line, the Hayward, Greenville, and Calaveras Faults to the northwest, and the Bear Mountain Fault Zone five miles east of and parallel to the county's eastern border. There is only one active fault identified in the county: the Ortigalita Fault, which is located along the western quarter of the county within the Coast Range Mountains. The Ortigalita Fault has not been active within historic times (1,800 years ago to present).

The community of Hilmar (including the project site) is not located within the boundaries of an Alquist-Priolo Earthquake Fault Zone, and no active faults are known to traverse the Hilmar area.

Seismic Groundshaking

The General Plan discusses the California Geologic Survey (CGS) Probabilistic Seismic Hazard Assessment (PHSA), which calculates earthquake shaking hazard through historic seismic activity and fault slip rates. The PHSA considers all faults that may result in seismic shaking, and includes faults that have no clear surface rupture. There is one PHSA identified thrust fault system in Merced County, the Great Valley Fault System, which runs along the foot of the Coast Range Mountains. Additionally, General Plan Figure 10-5 shows the areas in the county that may be subject to severe or moderate seismic damage (Zones III and II), most likely from activity along the Ortigalita Fault. The community of Hilmar (including the project site) is located in Zone II.

Based on the Seismic Damage Zones within Merced County, moderate ground shaking caused by events on distant and nearby active faults is considered a possible seismic hazard at the project site; however, this would be true for any potential school site within the Hilmar Unified School District boundaries.

Subsidence

The General Plan EIR indicates the risk of land surface subsidence or mine collapse in Merced County is low due to the general absence of subsurface rock mining operations within the county. However, there are two areas of subsidence from groundwater overdraft – one near Los Banos and the other near El Nido. The community of Hilmar (including the project site) is not located in an area of noted subsidence.

Ground Failure and Liquefaction

Seismic ground shaking can lead to detrimental settlement or liquefaction. Oftentimes when saturated soils are compacted during a seismic event, water is forced from voids within the soil to the ground surface, and the soil loses its support capacity. This loss of supporting capacity can result in a range of effects, from the minor displacement of constructed buildings to the total collapse of structures. Engineering methods and land use restrictions can be used to reduce the chances of these events occurring.

The General Plan EIR does not identify specific liquefaction hazard areas in the county, but it notes that potential for liquefaction exists due to unconsolidated sediments and a high water table in Merced County's wetland areas adjacent to the San Joaquin River, extending west to the Union Pacific Railroad and east towards State Route 99.

Throughout the Hilmar area, the measured depth to groundwater is 70 feet or greater. With depth to groundwater greater than 50 feet and the moderate ground shaking potential at the site, the risk of liquefaction is considered negligible.

Landslides

Except for some areas in the western portion of Merced County near the Coast Ranges, the majority of the county is located within the low-lying areas of the Central Valley basin, in which the risk of landslides is considered low. The project site and surrounding area is generally flat and not a landslide-prone area. As such, the potential for slope instability and occurrence of landslides is very low.

Additionally, as a standard part of the design and build process for the school campus project, the District would retain a qualified consultant to prepare a Geohazards Report and Geotechnical Engineering Investigation Report, including on-site borings and analysis of soil samples. These geotechnical reports are subject to review and approval by the California Division of the State Architect and the California Geological Survey pursuant to Note 48, and the District would incorporate any recommendations into the project design.

Based on the above information, impacts pertaining to Section 6(a)(i)-(iv) would be less than significant.

b. Result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. The project site consists entirely of land that currently comprises portions of the Hilmar High School and Elim Elementary School sites, thus the proposed project would be located within the footprint of a previously disturbed and developed area that already contains several buildings and hard surfaces.

The potential for water-or wind-borne erosion and loss of topsoil would exist during the construction phase of the proposed project, primarily due to clearing, grubbing, excavation, and grading activities. Once construction is completed, the potential for erosion would be minimal because the ground would be covered by buildings, hard surfaces, and landscaping. The project would be subject to requirements of the State Water Quality Control Board and the San Joaquin Valley Air Pollution Control District. General Construction Permit, Order No. 2012-0006-DWQ, issued by the State Water Quality Control Board in 2012, regulates construction projects of one acre or more, including the proposed project. Projects obtain coverage under the permit by developing and implementing the Storm Water Pollution Prevention Plans, which must specify best management practices that a project would employ to minimize pollution of storm water. Best management practices include erosion controls, sediment controls, wind erosion controls, non-

storm water management controls, and waste management and controls (i.e., good housekeeping practices).

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

Less Than Significant Impact. As discussed in Section 7(a), the project site is not subject to significant risks related to landslide, groundshaking, subsidence, liquefaction, or collapse. This impact would be less than significant.

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

Less Than Significant Impact. The Merced County General Plan EIR notes that future development under the 2030 General Plan may periodically be proposed on unstable or expansive soils (i.e., soils with high clay content and a greater potential to expand and contract under saturated and dry conditions). In evaluating risks related to unstable and expansive soils at the County-wide programmatic level, the General Plan EIR determined that impacts would be less than significant because of a comprehensive body of construction requirements enforced by the County (which include International Building Code (IBC) and California Building Code (CBC) requirements), and the goals and policies set forth in the 2030 General Plan that would avoid or reduce the effect of unstable soils and other types of geologic hazards.

Within the Hilmar area, the USGS Web Soil Survey tool and the Merced County General Plan EIR shows the presence of Delhi, Dello, Hilmar, and Atwater series soils. Along with the negligible-to-low risks of hazardous geologic conditions described in Section 7(a), the soil types mapped at the site do not appear likely to present an expansive soil hazard. Further, the project will be subject to the kinds of policies and regulations referenced in the General Plan EIR which apply to excavation, grading, and construction in unstable soils. These regulations require that engineered solutions be implemented to avoid or reduce the effects of potential soil hazards with respect to constructed buildings, if any such hazards were encountered as part of the project's development.

Considering the negligible-to-low risks of geologic hazards, the types of soils underlying the site, and the applicability of policies and regulations which avoid or reduce the effect of unstable soils and other types of geologic hazards, this impact is less than significant.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No impact. The project would not involve the use of septic tanks or alternative wastewater disposal system. The Hilmar County Water District provides community water and wastewater service within Hilmar, and the project would connect to its wastewater system.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact with Mitigation Incorporated. The project area contains no known surface-level paleontological resources or unique geological features. However, the possibility exists that subsurface paleontological resources may be discovered during project excavation and grading activities. The District has incorporated in the project the following mitigation measure to protect any subsurface resources that may be discovered.

- **Mitigation Measure GS-1:** Mitigation for Potential Discovery of Subsurface Paleontological Resources

  In the event that unique paleontological resources are discovered during ground disturbing activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. If the resources are determined to be potentially significant, the qualified paleontologist shall make recommendations to the District on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation and evaluations.

8. Greenhouse Gas Emissions

A technical analysis of greenhouse gas emissions was conducted for the project (Ambient 2020; Appendix 1 of this Initial Study).

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✓	
b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			✓	

Would the project:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. Implementation of the project would contribute to increases of GHG emissions that are associated with global climate change. To evaluate the potential significance of the project's GHG generation, the Air Quality and Greenhouse Gas Analysis (Appendix 1) utilizes a GHG efficiency threshold based on the project's service population, which is calculated by dividing the GHG emissions inventory goal (allowable emissions) by the estimated service population of the individual project. As discussed in the report, for most development projects the service population is defined as the sum of the number of jobs and the number of residents provided by a project. However, this traditional definition of service population may not be applicable to all projects, depending on the end use (e.g., for schools, the student and employee population is the primary generator of GHG emissions with a majority of the school's emissions being associated with student vehicle trips). Therefore, the calculated GHG efficiency of the proposed project was expanded to include the proposed student and employee population. GHG efficiency for the proposed project was calculated for years 2023 and 2030 to be consistent with state GHG-reduction target years. The methodology used for quantification of the target efficiency threshold applied to the proposed project is summarized in Table 8-1.

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Table 8-1
Project-Level GHG Efficiency Threshold Calculation

	Year 2023	Year 2030
Land Use Sectors GHG Emissions Target[1]	272,850,000	213,000,000
Population[2]	41,659,526	43,631,295
Employment[3]	19,442,770	20,795,940
Service Population	61,102,296	64,427,235
GHG Efficiency Threshold (MTCO2e/SP/yr)	4.2	3.3

Based on AB 32 Scoping Plan's land use inventory sectors for years 2020 and 2030; Includes transportation sources.

1. California Air Resources Board. California 1990 Greenhouse Gas Emissions Level and 2020 Limit – by Sector and Activity (Land Use-driven sectors only) MMT CO2e (based upon IPCC Fourth Assessment Report Global Warming Potentials)

2. California Department of Finance, Demographic Research Unit. 2019. Report P-1 "State Population Projections (2010 – 2060), Total Population by County".

3. California Employment Development Department. 2019. Employment Projections Labor Market Information Resources and Data, "CA Long-Term. 2016-2026 Statewide Employment Projections".

Source: Ambient 2020

Short-term and long-term GHG emissions associated with the development of the proposed project are evaluated as follows:

Short-term Greenhouse Gas Emissions

Short-term annual GHG emissions associated with the proposed project were calculated using the CalEEMod computer program and are summarized in Table 8-2. Based on the modeling conducted, annual emissions of GHGs associated with construction of the proposed project would total approximately 378.7 MTCO2e. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Actual emissions would vary, depending on various factors including construction schedules, equipment required, and activities conducted. Assuming an average project life of 30 years, amortized construction-generated GHG emissions would total approximately 12.6 MTCO2e/yr. Amortized construction-generated GHG emissions were included in the operational GHG emissions inventory for the evaluation of project-generated GHG emissions (see Table 8-3).

Table 8-2
Short-Term Construction GHG Emissions

Construction Year	Annual GHG Emissions ($MTCO_2e$)
Year 1	299.5
Year 2	79.2
Total:	378.7
Amortized Construction Emissions:	12.6

Based on CalEEMod computer modeling. Includes EMFAC off-model adjustment factors to account for SAFE Vehicle Rule (ARB 2020d). Amortized emissions calculated based on total construction-generated emissions over an estimated 30-year project life.

Refer to Appendix A of Air Quality and Greenhouse Gas Analysis (Initial Study Appendix 1) for modeling results and assumptions.

Source: Ambient 2020

Long-term Greenhouse Gas Emissions

Estimated long-term increases in GHG emissions associated with the proposed project were calculated using the CalEEMod computer program and are summarized in Table 8-3. Based on the modeling conducted, operational GHG emissions would total approximately 383.7 MTCO2e/year in 2023 and approximately 327.9 MTCO2e/year in 2030. With the inclusion of amortized construction emissions, operational GHG emissions would total approximately 396.3 MTCO2e/year in 2023 and approximately 340.5 MTCO2e/year in 2030. Assuming a net increase in the on-site student population of 200 students,

the calculated GHG efficiency for the proposed project would be 2.0 MTCO2e/SP/yr in 2023 and 1.7 MTCO2e/SP/yr in 2030.

Table 8-3
Long-Term Operational GHG Emissions

Emissions Source	Total GHG Emissions ($MTCO_2e$ per year)[1]	
	Year 2023	Year 2030
Energy Use	97.0	81.0
Mobile Sources[2]	275.8	240.9
Waste Generation[3]	9.2	4.6
Water Use[4]	1.8	1.4
Total Project Operational Emissions:	383.7	327.9
Amortized Construction Emissions:	12.6	12.6
Total with Amortized Construction Emissions:	396.3	340.5
Service Population[5]:	200	200
Project GHG Efficiency ($MTCO_2e$/SP/yr):	2.0	1.7
GHG Efficiency Threshold ($MTCO_2e$/SP/yr):	4.2	3.3
Exceeds Threshold/Significant Impact?	No	No

1. Project-generated emissions were quantified using the CalEEMod computer program.

2. Fleet distribution data for the project is not available. Mobile-source emissions are conservatively based on default vehicle fleet distribution for Merced County, which includes all vehicle types/classifications, including medium and heavy-duty vehicles. Emissions were quantified based on the net increase in vehicle trips associated with the proposed project. Includes EMFAC off-model adjustment factors to account for SAFE Vehicle Rule (ARB 2020d).

3. Based on state-wide waste diversion rate of 50 percent for 2023 and target diversion rate of 75 percent for 2030.

4. Includes installation of low-flow water fixtures and water-efficient irrigation systems, per California's 2015 water-efficiency standards.

5. To be conservative, service population is based on a net increase in student population of 200 individuals. Refer to Appendix A of Air Quality and Greenhouse Gas Analysis (Initial Study Appendix 1) for modeling results and assumptions.

Source: Ambient 2020

Based on the modeling conducted, the calculated GHG efficiency for the proposed project would not exceed the thresholds of 4.2 MTCO2e/SP/yr in 2023 or 3.3 MTCO2e/SP/yr in 2030. As depicted in Table 8-3, operational GHG emissions associated with the proposed project would be predominantly associated with mobile sources. It is important to note that mobile-source emissions were conservatively calculated, based on the default fleet-distribution assumptions contained in the model, which includes medium and heavy-duty vehicles. Mobile sources associated with schools typically consist largely to light-duty vehicles and buses. As a result, actual mobile-source emissions would be less. Nonetheless, because the GHG efficiency for the proposed project would not exceed the efficiency thresholds for 2023 or 2030, this impact would be considered less than significant.

b. Conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of greenhouse gases?

Less Than Significant Impact. As discussed in Section 8(a) above, the proposed project would not result in increased GHG emissions that would conflict with AB 32 GHG-reduction targets. The proposed project would be designed to meet current building energy-efficiency standards, which includes measures to reduce overall energy use, water use, and waste generation. The project would also be designed to promote the use of alternative means of transportation, such as bicycle use, and to provide improved pedestrian access that would link the project site to nearby land uses. These improvements would help to further reduce the project's GHG emissions and would also help to reduce community-wide GHG emissions. For these reasons, the proposed project would not conflict with local or state GHG-reduction planning efforts.

9. Hazards and Hazardous Materials

In addition to the questions from Appendix G of the State CEQA Guidelines, this topic includes questions that are specific to the planning and development of school facilities. The questions are based on regulatory criteria for school site selection set forth in Title 5 of the California Code of Regulations (see Section 14010, Standards for School Site Selection).

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

i.	Be located on a hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code?				✓
j.	Be located on the site of one or more buried or above-ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? (This does not include a natural gas pipeline used only to supply the school or neighborhood)				✓
k.	Be located within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor?				✓
l.	Be located within one-quarter mile of facilities that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or extremely hazardous materials, substances, or waste?			✓	

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction of the project would involve the transport and use of fuels, lubricants, greases, solvents, and architectural coatings including paints. Operation of the project would involve hazardous materials used for cleaning and maintenance purposes: cleansers, solvents, paints, pesticides, and fertilizers. The school would be subject to state and local regulations governing the routine transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment.

The Draft PEIR for the 2030 Merced County General Plan considers impacts related to hazardous materials on a County-wide basis. According to the Draft PEIR, "while the likelihood of hazardous material releases cannot be completely eliminated, the 2030 General Plan Health and Safety, Land Use, and Air Quality Elements contain goals and policies that address the routine use, storage, transport, and disposal of hazardous materials." The Draft PEIR also discusses the Merced County Department of Environmental Health's role in the oversight of various state and local hazardous material programs, including investigation and clean-up at sites that have hazardous contamination or leaking underground storage tanks, and also the implementation of various clean-up programs with coordination from the State Department of Toxic Substances Control and the State and Regional Water Quality Control Boards. The Draft PEIR determined that compliance with health department programs and plans, in conjunction with other federal and state programs and the 2030 General Plan policies, would reduce the impact of reasonably foreseeable accidents or upset conditions involving the release of hazardous materials.

The California Education Code requires that the proposed school site undergo an environmental review process for hazardous materials overseen by the California Department of Toxic Substances Control (DTSC). The purpose of the process is to determine if a release or threatened release of any hazardous materials found on the proposed site or presence of any naturally occurring hazardous materials on the site present a risk to human health or the environment. The District, working with DTSC, must identify and implement

measures that would mitigate any hazardous conditions before the California Department of Education approves the school site and provide funding for the project.

A Preliminary Environmental Assessment (PEA) was prepared by Geosyntec Consultants, Inc. (September 18, 2020) on behalf of the District, which included site testing for organochlorine pesticides (OCPs), arsenic, lead and Polychlorinated Biphenyls (PCBs). Other than arsenic, site constituents of potential concern were below respective screening levels. Arsenic concentrations were within the range of background site concentrations. The PEA concluded that a response action should not be necessary at the site.

The Merced County General Plan Draft PEIR adequately describes the types of hazards-related impacts that could be associated with the construction, modification, and operation of the proposed K-2 elementary school campus and other school facilities encompassed in the project. The General Plan PEIR's conclusion that the impacts would be less than significant also applies to the proposed project. Further, the District's existing school sites are subject to state and local regulations governing the routine transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment; the same would apply to the proposed project. This, in combination with the requirements of the Education Code related to evaluation of the site for hazardous materials and removal of such materials, as needed, will ensure that impacts will be less than significant.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. This impact is addressed in Section 9(a) above.

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

Less Than Significant Impact. The proposed project, in and of itself, involves the construction and operation of a new elementary school campus plus reconfiguring the layout/orientation of the District's existing Elim Elementary School campus. The campuses of Hilmar Middle School and Hilmar High School are located within one-quarter mile of the project site. The potential for the project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste is addressed in Section 9(a) above and was determined to be less than significant.

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

No Impact. Based on a review of the PEA Workplan (Geosyntec, 2020) and a review of the project area using DTSC's EnviroStor website and SWRCB's Geotracker website, the project site is not on a list of hazardous materials sites consistent with Government Code Section 65962.5.

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

No Impact. The project site is not within two nautical miles of a public or private airport and is not within an area subject to an airport land use plan. As the project site is a considerable distance from the nearest airports and is not subject to an airport land use plan, the project would not result in airport-related safety hazards for students and staff at the project site. Moreover, the project would not result in a change in airport traffic patterns, including an increase in traffic or change that results in substantial safety risks.

f. Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. All schools have emergency response/evacuation plans. Research conducted for this Initial Study did not identify any adopted emergency response plans or emergency evacuation plans the project could impair. This impact is considered less than significant.

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

No Impact. The project site is in an urban area and not within or near an area subject to wildland fires.

h. Be located on the site of a current or former hazardous waste or solid waste disposal facility and, if so, have the wastes been removed?

No Impact. Based on the information contained in the PEA Workplan (Geosyntec 2020), the project site is not a hazardous materials site, hazardous substance release site, or the site of a current or former hazardous waste or solid waste disposal facility, nor does it contain any pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes.

i. Be located on a hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code?

No Impact. This impact is addressed in Section 9(h) above.

j. Be located on the site of one or more buried or above-ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? (This does not include a natural gas pipeline used only to supply the school or neighborhood)

No Impact. This This item is addressed in Section 9(h) above.

k. Be located within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor?

No Impact. Based upon the PEA Workplan (Geosyntec 2020) and Google Earth, the project site is not within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor. Per Education Code Section 17213(d)(9) "Freeway or other busy traffic corridors" means those roadways that, on an average day, have traffic in excess of 50,000 vehicles in a rural area as defined in Section 50101 of the Health and Safety Code, and 100,000 vehicles in an urban area, as defined in Section 50104.7 of the Health and Safety Code.

l. Be located within one-quarter mile of facilities that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or extremely hazardous materials, substances, or waste?

Less Than Significant Impact. Based upon consultations with the San Joaquin Valley Air Pollution Control District and the Merced County Department of Public Health, there was one facility identified that might reasonably be anticipated to emit hazardous air emissions, or to handle hazardous or extremely hazardous materials, substances, or waste within one-quarter mile of the new school site. This was the transportation, maintenance, and shop facilities of the Hilmar Unified School District, which are located 500 to 800 feet north of the new school site. At the transportation site, there is a 10,000-gallon underground storage tank for diesel, a 5,000-gallon underground storage tank for gasoline and a 500-gallon above ground storage tank for waste oil. The Health Department information also indicates storage of other potentially hazardous materials, such as transmission fluid, waste anti-freeze, kerosene, waste absorbent, solvent, freon-22, cleaning products, and gasses (acetylene, helium, nitrogen, oxygen, carbon dioxide) that are used in the shop, maintenance and transportation areas serving the existing school facilities. The PEA Workplan (Geosyntec 2020) indicates that the above storage tanks and hazardous materials should not represent a concern to the new school site.

10. Hydrology and Water Quality

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

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less Than Significant Impact. The Hilmar County Water District's community water and wastewater systems would serve the project. The water supply system complies with applicable water quality standards and the wastewater discharge system complies with applicable waste discharge requirements. The design and operational characteristics of the project are consistent with the long-range planning for the site and the Hilmar area, which includes planning for public utilities services. Further, the project would be subject

to applicable Hilmar CWD standards and specifications to ensure proper connection of the project to its water and wastewater systems. Therefore, this is a less than significant impact.

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

Less Than Significant Impact. The project site lies within the Turlock Groundwater Subbasin, a hydrologic region that includes portions of Merced and Stanislaus Counties and is part of the larger San Joaquin Valley Groundwater Basin. The Turlock Subbasin, while not critically overdrafted, is identified as a High Priority Basin in Bulletin 118 published the California Department of Water Resources concerning the occurrence and nature of groundwater statewide. Hilmar CWD obtains its water supply via groundwater wells in the area, and groundwater is likely to remain either a major source or the sole source of Hilmar's water supply.

The project would not substantially decrease groundwater supplies. Generally, school facilities generate less overall demand for water than other uses such as single-family residential development. In this instance, the project would also reduce the amount of turfed area currently present at the project site, which would function to reduce demand for water needed to irrigate turfed surfaces. Additionally, the project is consistent with the land use designations planned for the site in the Merced County General Plan and Hilmar Community Plan, so the demand for water associated with the project would be consistent with the demand anticipated in the long-range planning for the community of Hilmar and surrounding area. For these reasons, the project would have a less than significant impact on groundwater supplies.

Regarding groundwater recharge, the project site currently contains impermeable roads, buildings, and hardcourt surfaces associated with the existing school facilities as well as large turfed areas which are used for recreational purposes. While development of the proposed school facilities and parking areas would add new impermeable areas to the site which could impede recharge, as a whole there would be substantial amounts of remaining areas allowing for groundwater recharge. Overall, the project would not substantially change groundwater recharge conditions at the site, thus this impact is considered less than significant.

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

i. Result in substantial erosion or siltation on- or off-site;

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

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

iv. Impede or redirect flood flows?

Less Than Significant Impact for (c)(i), (ii), and (iv). Less Than Significant Impact with Mitigation Incorporated for (c)(iii). Storm drainage services at the project site and its vicinity are administered by the Hilmar County Water District (Hilmar CWD) and the County of Merced. Stormwater runoff is currently discharged in the Turlock Irrigation District (TID) Lateral No. 7. (Merced County Water & Sewer Providers MSR, September 2020) No streams or rivers exist on the project site. The Merced River is located approximately 1.7 miles away.

Grading required for the proposed project would change the existing drainage pattern within the project site, and the additional covered surfaces would increase the amount of surface runoff and, potentially, the rate of runoff. The runoff would have the potential to degrade surface and groundwater quality if not properly controlled. The increased runoff would also need to be appropriately handled in storm drainage facilities, on and/or off site, in compliance with Hilmar CWD and County of Merced requirements. This is addressed in more detail in Section 19(a) and Mitigation Measure US-1 is provided.

The project site, which consists of portions of existing high school and elementary school campuses, has already undergone substantial grading and improvements with covered surfaces. The additional school

facilities and improvements proposed as part of the project would not entail substantial alterations of the drainage conditions at the site given their size and planned siting in relation to the existing campus.

Before beginning construction, Hilmar Unified must prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP is a site-specific plan that is designed to control the discharge of pollutants from the construction site to local storm drains and waterways. Additionally, the District would be subject to compliance with applicable grading and drainage requirements of the County of Merced during design and construction of the proposed school facilities and storm water retention basin.

Based on these factors, impacts of the project pertaining to Section 10(c)(i), (ii), and (iv) would be less than significant.

Mitigation Measure: Implement Mitigation Measure US-1 (refer to Section 19(a) below)

Level of Significance After Mitigation: With implementation of Mitigation Measure US-1, impacts of the project related to runoff and storm drainage facilities would be less than significant.

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

No Impact. The project site is not located in a flood hazard, tsunami, or seiche zone.

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

Less Than Significant Impact. The Sustainable Groundwater Management Act (SGMA) was signed into law in 2014 to remedy unsustainable groundwater depletion in groundwater basins in California. SGMA requires the development and adoption of Groundwater Sustainability Plans (GSPs) within all high and medium priority groundwater basins (including the Turlock Sub-basin) so that these basins can achieve sustainability. SGMA gives local agencies the authorities to manage groundwater in a sustainable manner and allows for limited state intervention when necessary to protect groundwater resources. The Turlock Subbasin is identified as a High Priority Basin in Bulletin 118 published the California Department of Water Resources concerning the occurrence and nature of groundwater statewide. While the subbasin is not critically overdrafted and thus not subject to some more immediate requirements of SGMA, under SGMA the basin is required to adopt a GSP by 2022 and reach sustainability by 2042.

Hilmar County Water District is participating with other local agencies in the West Turlock Subbasin Groundwater Sustainability Agency (WTS GSA), a joint powers agency formed to implement SGMA for the western portion of the Turlock Subbasin. Consistent with SGMA, the WTS GSA is developing a GSP targeted for completion before the legislated deadline of January 31, 2022. This document will be developed in compliance with the California Department of Water Resources' Groundwater Sustainability Plan Emergency Regulations. Developed pursuant to Water Code Section 10733.2, the regulations describe the components of groundwater sustainability plans, intra-basin coordination agreements, and the methods and criteria to be used by DWR to evaluate those plans and coordination agreements.

As discussed above in Section 10(b), the proposed school site facilities are not expected to substantially affect groundwater supplies or recharge. As such, the project is not expected to conflict with or obstruct the GSP ultimately adopted by the WTS GSA. No other potential conflicts pertaining to water quality planning and/or groundwater management have been identified.

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11. Land Use and Planning

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

Would the project:

a. Physically divide an established community?

No Impact. The proposed project would not have an impact of physically dividing an established community. The new elementary school campus, reconfigured Elim Elementary School campus, parking areas and related improvements included as part of the project would utilize a site that has previously been in use with development of similar form and intensity (i.e., existing public elementary and high school facilities operated by Hilmar Unified). No aspects of the project have been identified as causing a physical division of the surrounding area.

b. Conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The proposed facilities and operational activities included as part of the project are consistent with land use plans, policies, and regulations adopted for the project area. The proposed elementary school project is consistent with the land use and zoning designations for the project site as indicated in the Merced County General Plan, Hilmar Community Plan, and Merced County Zoning Map – all of which identify the project site as an area for public/quasi-public facilities and allow for school uses. Additionally, by directing development and activity within Hilmar's existing community boundary, development and operation of the project will function to advance several of the overarching goals and objectives of the Merced County General Plan and Hilmar Community Plan. Further, this Initial Study demonstrates that all potential impacts of the project are either less than significant or can be mitigated to a less than significant impact.

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12. Mineral Resources

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

Would the project:

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

No Impact. The project would have no impacts on known mineral resources. The project site is located in an urbanized area and would not result in the loss of availability of a known mineral resource because no known resources exist on or near the proposed site. The project would not result in the loss of availability of a locally important mineral resource recovery site because none exists on or near the site. (Merced County General Plan Revised Background Report (2012), 2030 Merced County General Plan DEIR (2012))

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

No Impact. This impact is addressed in Section 12(a) above.

13. Noise

This section is based on Noise Impact Analysis prepared for the project (Ambient 2020, included as Appendix 3 of this Initial Study).

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		✓		
b. Generation of excessive groundborne vibration or groundborne noise levels?			✓	

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

Would the project result in:

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

Less Than Significant Impact with Mitigation Incorporated. Noise generated by the proposed project would occur during short-term construction and long-term operation. Noise-related impacts associated with short-term construction and long-term operations of the proposed project are discussed separately, as follows:

Short-Term Construction Noise Levels

Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition/land clearing, grading and excavation, erection). Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Although noise ranges were found to be similar for all construction phases, the initial site preparation phases, including demolition and grading/excavation activities, tend to involve the most equipment and result in the highest average-hourly noise levels.

Noise levels commonly associated with construction equipment are summarized in Table 6 of Appendix 4. As noted there, instantaneous noise levels (in dBA Lmax) generated by individual pieces of construction equipment typically range from approximately 80 dBA to 85 dBA Lmax at 50 feet (FTA 2006). Typical operating cycles may involve 2 minutes of full power, followed by 3 or 4 minutes at lower settings. Average-hourly noise levels for individual equipment generally range from approximately 73 to 82 dBA Leq. Based on typical off-road equipment usage rates and assuming multiple pieces of equipment operating simultaneously within a localized area, such as soil excavation activities, average-hourly noise levels could reach levels of approximately 80 dBA Leq at roughly 100 feet.

Depending on the location and types of activities conducted (e.g., building demolition, soil excavation, grading), predicted noise levels at the nearest residences, which are generally located to the east and south of the project site, could potentially exceed 75 dBA Leq/Lmax. Construction-generated noise levels could potentially exceed the County's noise standards. Furthermore, with regard to residential land uses, activities occurring during the more noise-sensitive evening and nighttime hours could result in increased levels of annoyance and potential sleep disruption. For these reasons, noise-generating construction activities would be considered to have a potentially significant short-term noise impact.

- **Mitigation Measure N-1**: Reduction of Construction-Generated Noise Levels

  The following measures shall be implemented to reduce construction-generated noise levels:

  a. Construction activities (excluding activities that would result in a safety concern to the public or construction workers) shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. Construction activities shall be prohibited on Sundays and legal holidays.

  b. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours and truck haul routes shall be selected to minimize impacts to nearby residential dwellings.

  c. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.

d. Stationary construction equipment (e.g., portable power generators) should be located at the furthest distance possible from nearby residences. If deemed necessary, portable noise barriers shall be erected sufficient to shield nearby residences from direct line-of-sight of stationary construction equipment.

e. When not in use, all equipment shall be turned off and shall not be allowed to idle. Provide clear signage that posts this requirement for workers at the entrances to the site.

Level of Significance after Mitigation: Use of mufflers would reduce individual equipment noise levels by approximately 10 dBA. Implementation of the above mitigation measures would limit construction activities to the less noise-sensitive periods of the day. With implementation of the above mitigation measures, this impact would be considered less than significant.

Long-Term Operational Noise Levels

Potential long-term increases in noise associated with the proposed project would be primarily associated with the operation of building equipment, such as heating, ventilation, and air conditioning (HVAC) units, outdoor recreational activities, and vehicle use within onsite parking lots.

Building Mechanical Equipment

Operation of the proposed elementary school would be predominantly limited to daytime hours. Proposed onsite structures would be anticipated to include the use of building mechanical equipment, such as air conditioning units and exhaust fans. The specific building mechanical equipment to be installed and the locations of such equipment have not yet been identified. Building mechanical equipment (e.g., air conditioning units, exhaust fans) would typically be located within the structures, enclosed, or placed on rooftop areas away from direct public exposure. Exterior air conditioning units would be anticipated to generate the loudest noise levels at exterior locations. Exterior air conditioning units can generate noise levels up to approximately 65 dBA L50/Leq at 10 feet. Based on this noise level and assuming a noise-attenuation rate of 6 dB/doubling of distance from the source, predicted noise levels at the nearest residential land uses would be 44 dBA L50/Leq, or less. Predicted operational noise levels at nearby residential land uses would not exceed the County's applicable exterior daytime noise standard of 55 dBA L50/Leq. Noise generated by building mechanical equipment would be considered to have a less than significant impact.

Recreational Facilities

The proposed project includes the construction of play courts and structures. Based on measurement data obtained from similar uses, noise levels associated with small playgrounds, courts, and ball fields can generate noise levels of approximately 55-60 dBA L50/Leq at 50 feet. Assuming a maximum noise level of 60 dBA L50/Leq, predicted noise levels at the nearest residential land uses would be approximately 44 dBA L50/Leq, or less. Predicted operational noise levels at nearby residential land uses would not exceed the County's applicable exterior daytime noise standard of 55 dBA L50/Leq. Therefore, noise generated by the proposed playground would not be considered to have a potentially significant impact.

Vehicle Parking Areas

The proposed project would include the construction and use of various surface parking lots, including an approximate 22-space parking lot located near the northeastern boundary of the project site. Staff and visitor parking lots are also located near the eastern boundary of the project site with a combined parking area of 36 spaces. Based on a conservative assumption that all parking spaces within the parking areas were to be accessed over a one-hour period, predicted operational noise levels commonly associated with parking areas typically average approximately 44 dBA L50/Leq, or less. These predicted operational noise levels would not exceed the County's applicable daytime exterior noise standard of 55 dBA L50/Leq. Noise generated by the proposed vehicle parking areas would be considered to have a less than significant impact.

Roadway Traffic

Predicted existing traffic noise levels, with and without implementation of proposed project, are summarized in Table 7 of Appendix 4. In comparison to existing traffic noise levels, the proposed project

would result in a predicted increase in traffic noise levels of approximately 0.1 to 4.8 dBA along area roadways.

Predicted increases in future cumulative traffic noise levels along nearby roadways for proposed project are summarized in Table 8 of Appendix 4. In future years, the project's contribution to cumulative traffic noise levels would be anticipated to decline slightly as increases in vehicle traffic due to surrounding development increases. Under future cumulative conditions, the proposed project would result in predicted increases in traffic noise levels of 0.1 to 4.4 dBA along area roadways.

As noted earlier in this report, changes in ambient noise levels of approximately 3 dBA, or less, are typically not discernible to the human ear and would not be considered to result in a significant impact. Implementation of the proposed project would not result in a significant increase (i.e., 5 dBA, or greater) in existing or projected future traffic noise levels along area roadways. The highest predicted increase in traffic noise levels is projected to occur along Geer Avenue west of Lander Avenue. However, predicted traffic noise levels along this roadway segment would not be projected to exceed the County's exterior noise standard of 65 dBA Ldn/CNEL at adjacent residential land uses. As a result, this impact would be considered less than significant.

Land Use Compatibility

The County of Merced General Plan Noise Element includes noise standards for determination of land use compatibility for new land uses. As previously discussed, the County's "normally acceptable" exterior noise standards for schools is 65 dBA Ldn/CNEL.

As noted earlier in this report, ambient noise levels in the project area are largely influenced by traffic noise on area roadways. Under future cumulative conditions, with project-generated vehicle traffic included, the predicted traffic noise levels for the adjacent segment of Geer Avenue would be approximately 62 dBA Ldn/CNEL at 50 feet from the near-travel-lane centerline. Based on preliminary site plans, the nearest proposed structures and outdoor activity areas would be located in excess of 80 feet from the near-travel-lane centerline of Geer Avenue. Based on this distance, predicted exterior noise levels at the nearest proposed structure/outdoor activity area would be approximately 58 dBA Ldn/CNEL, or less. Based on this exterior noise level and assuming an average exterior-to-interior noise reduction of 25 dBA, which is typical for new building construction, predicted interior noise levels at the nearest proposed structure would be approximately 33 dBA Ldn/CNEL, or less. Predicted exterior and interior noise levels would not exceed the County's applicable noise standards of 65 and 40 dBA Ldn/CNEL, respectively. As a result, this impact would be considered less than significant.

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

Less Than Significant Impact. Long-term operational activities associated with the proposed project would not involve the use of any equipment or processes that would result in potentially significant levels of ground vibration. Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term construction-related activities. Construction activities associated with the proposed improvements would likely require the use of various off-road equipment, such as tractors, concrete mixers, and haul trucks. The use of major groundborne vibration-generating construction equipment, such as pile drivers, would not be required for this project.

Groundborne vibration levels associated with the representative construction equipment are summarized in Table 9 of Appendix 4. As depicted there, predicted ground vibration generated by construction equipment would range from 0.003 in/sec ppv up to 0.089 in/sec ppv at 25 feet (Caltrans 2020). Predicted vibration levels at the nearest existing structures would not be anticipated to exceed commonly applied criteria for structural damage or human annoyance (i.e., 0.5 and 0.2 in/sec ppv, respectively). In addition, no fragile or historic structures have been identified in the project area. As a result, this impact would be considered less than significant.

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

No Impact. The proposed project is not located within the vicinity of a private airstrip or within an airport land use plan area. The nearest airport in the project vicinity is the Turlock Airpark, which are located approximately 4.5 miles to the north of the project site. The nearest private airstrip is located approximately 3.7 miles west of the project site. The project site is not located within the projected noise contours of major airports within Merced County (Merced County 2012). Implementation of the proposed project would not result in the exposure of sensitive receptors to aircraft noise levels nor would the proposed project affect airport operations.

14. Population and Housing

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

Would the project:

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

Less Than Significant Impact. The proposed elementary school project would not induce substantial unplanned growth. The project would be located on a site that is both already developed with public school facilities and has been specifically planned for accommodating future educational facilities in the Merced County General Plan and the Hilmar Community Plan. No aspects of the project's location, design, or operational features have been identified as having potential to cause a substantial effect on population growth that would differ from the growth planning set forth in the Merced County General Plan and the Hilmar Community Plan. Further, the project does not require the extension of roads or other infrastructure such as water, sewer, and drainage infrastructure into previously unserved geographic areas. For these reasons, this impact would be less than significant.

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

No impact. The proposed school site does not contain any existing housing or population.

15. Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or need for new or physically altered government 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:				
(i) Fire Protection?			✓	
(ii) Police Protection?			✓	
(iii) Schools?			✓	
(iv) Parks?			✓	
(v) Other public facilities?			✓	

a. Would the project result in substantial adverse physical impacts associated with the provision of new or altered governmental facilities, need for new or altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: Fire Protection, Police Protection, Schools, Parks, and other public facilities?

Less Than Significant Impact. The project would not result in the need for new or physically altered fire protection, police protection, parks, other public facilities in order to maintain acceptable service ratios, response times or other performance objectives. The project site is situated within an area of established development where existing public facilities and services are in place, and the project involves adding new development which is of essentially the same character as what already in existence at the project site (i.e., educational facilities). During preparation of this Initial Study, details of the project were distributed to Merced County and other agencies which public services to the vicinity, and no comments were provided indicating any potentially significant issues regarding the provision of public services for the project. Therefore, the impact of the proposed project related to fire protection, police protection, parks, other public facilities would be less than significant.

The project is a school, the impacts of which are addressed in other sections of this Initial Study and have been found to be less than significant with incorporation of the mitigation measures detailed in the other sections of this Initial Study. Further, development of the proposed school facilities would have a positive impact on the capacity of Hilmar Unified to accommodate students in elementary grade levels within the District's attendance area.

16. Recreation

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

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

Less Than Significant Impact. The project would not increase in the use of existing parks and/or recreational facilities in a manner that would cause substantial physical deterioration. The project is not expected to substantially increase the demand for or use of existing park and recreation facilities, as the project would primarily accommodate an existing population of Hilmar Unified students and employees. Although the proposed project entails removal and reconfiguration of some turfed areas utilized for recreational purposes by Hilmar High School, the size of the area impacted is relatively minor and would not substantially affect existing recreational activities taking place at the school. Additionally, the proposed project would include new recreational facilities to serve students at the campus, which Hilmar Unified could make available to the community for recreational and other uses, alleviating potential demand placed on existing facilities. This impact is thus considered less than significant.

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

Less Than Significant Impact. The project would include the addition and reconfiguration of recreational facilities for outdoor play and physical education purposes. This Initial Study addresses impacts associated with the development of the facilities as part of the evaluation of impacts in Part E, Sections 1-21; none of the impacts identified in the Initial Study are specifically attributable to, or amplified by, the recreational facilities included in the project. The project would not require construction or expansion of recreational facilities elsewhere in the vicinity.

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17. Transportation

The discussion of transportation and traffic impacts in this section primarily reflects information in the Traffic Impact Analysis (TIA), Initial Study Appendix 4, prepared for the project by JLB Traffic Engineering, Inc.

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

Would the project:

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

Less Than Significant Impact with Mitigation Incorporated. The discussion below addresses potential impacts regarding roadway and vehicular transportation, as well as bicycle, pedestrian, and transit facilities.

Vehicle and Roadway Transportation Evaluation

As of July 1, 2020, in accordance with Senate Bill (SB) 743 (Steinberg 2013), agencies considering the transportation impacts of new projects must analyze vehicle miles traveled (VMT) instead of Level of Service (LOS), which measures the level of congestion at intersections and roadways[4]. Automobile delay, as described solely by LOS or similar measure of traffic congestion, is no longer considered a significant impact under CEQA. VMT measures how much actual auto travel (additional miles driven) a proposed project would create on area roadways. The intent of SB 743 is to align CEQA transportation study methodology to promote the state's goals of reducing greenhouse gas emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations. Section 17(b) below discusses the project's impacts related to VMT.

Since the CEQA analysis for this project was started in 2019, and it was initially anticipated that it would be completed or at least distributed for review before the July 1, 2020 deadline for VMT implementation, a Level of Service-based traffic impact analysis (TIA) was prepared for the project by JLB Traffic Engineering, Inc. (Initial Study Appendix 4) and is provided for informational purposes.

[4] Level of Service (LOS) is a qualitative index of the performance of an element of the transportation system. LOS is a rating scale running from "A" to "F", with "A" indicating no congestion of any kind and "F" indicating unacceptable congestion and delays. Historically, both Merced County and Caltrans have utilized LOS as part of their respective transportation planning.

As noted in the TIA, there were five intersections analyzed under various scenarios. The intersections and scenarios are listed below.

Study Intersections

1. Lander Avenue / Echo Street
2. Lander Avenue / Dayton Avenue
3. Project Driveway 1 / Geer Avenue
4. Project Driveway 2 / Geer Avenue
5. Lander Avenue / Geer Avenue

Study Scenarios

- Existing Traffic Conditions
- Existing plus Project Traffic Conditions
- Near Term plus Project Traffic Conditions
- Cumulative Year 2040 No Project Traffic Conditions
- Cumulative Year 2040 plus Project Traffic Conditions

The TIA includes Trip Generation and Trip Distribution analyses which model both existing and predicted future vehicle trips generated from the project site and how those trips are distributed along the transportation network. Based on the Trip Generation analysis, the proposed project is estimated to generate a net additional 378 daily trips, 134 AM peak hour trips and 68 PM peak hour trips (see Table V, p. 15 of the TIA). The Trip Distribution analysis (depicted in Figures 4 through 6 of the TIA) shows net increased trip activity at the Lander Avenue / Geer Avenue intersection and along Geer Avenue at the proposed project driveways, presumably attributable to the operation of the new elementary school campus and the relocation of activities at the existing Elim Elementary campus away from the Lander Avenue frontage.

The TIA recommended improvements at three of the five intersections (Lander Avenue / Dayton Avenue, Project Driveway 1 / Geer Avenue, and Lander Avenue / Geer Avenue) in order to maintain conditions of "LOS C" or better, with the improvements occurring prior to operation of the proposed project. These improvements would include signalization of the Lander Avenue / Geer Avenue intersection with split phasing in the east-west directions, lane modifications and additions at Project Driveway 1 / Geer Avenue intersection, and modification of Dayton Avenue access at Lander Avenue via installation of a raised median island (refer to the TIA for additional detail regarding the recommended improvements).

As these improvements are based on LOS congestion analysis, they are provided for informational purposes only and are not considered CEQA impacts requiring mitigation. The District is aware that Caltrans is planning to signalize the intersection on Geer and Lander Avenue, regardless of whether the school project is completed. Further, relocating the Elim Elementary vehicular access and parking away from Lander Avenue to the new access area off of Geer Avenue will eliminate crossing movements on Lander Avenue to enter and exit the existing school drop-off area.

Bicycle, Pedestrian, and Transit Evaluation

Planning for bicycle, pedestrian, and transit facilities within the community of Hilmar is most directly set forth in the Hilmar Community Plan. The Hilmar Community Plan includes several goals, objectives, and policies which promote increased development and connectivity of bicycle, pedestrian, and transit facilities within the community, such as the following:

- Land Use Goal: Create a pedestrian oriented community that accommodates residential, business, and economic growth, while maintaining a small-town atmosphere.
- Circulation Goal: Provide a safe and efficient transportation network for vehicles, bicycles, pedestrians, and transit.

- Objective CI 4.0: Link public amenities, such as schools and parks, to residential neighborhoods with bicycle/pedestrian facilities.
- Policy PR 2.1: Residential neighborhoods, parks, and schools are strongly encouraged to be linked by a pedestrian/bicycle trail system to promote local non-vehicular travel.

Currently, walkways exist in the vicinity of the proposed project site along Lander Avenue, Echo Street, Dayton Avenue east of Lander Avenue, and the majority of the north side of Geer Avenue. As depicted in the project's site plan, pedestrian walkways are proposed near the northeast corner of the campus with paths toward Elim (east) and Hilmar High School (north). To be consistent with the pedestrian planning set forth in the Hilmar Community Plan, an ADA-compliant walkway will need to be provided along the project's frontage to Geer Avenue along with pedestrian facilities that connect to the proposed buildings on campus. With the implementation of the recommended walkways, pedestrians will have adequate and safe pedestrian facilities at all times.

The Hilmar Community Plan identifies potential bike routes along the following roadway segments in the vicinity of the project site: Lander Avenue through the community of Hilmar as a Merced County Regional Bicycle Route; Echo Street between Lander Avenue and Camden Drive as a Class II Bicycle Route; Geer Avenue west of Lander Avenue as a Merced County Regional Bicycle Route; and Geer Avenue east of Lander Avenue as a Class II Bicycle Route. To be consistent with the bicycle facilities planning set forth in the Hilmar Community Plan, a Class II bike lane will need to be provided along the project's frontage to Geer Avenue.

The project would not affect existing public transit service or conflict with transit policies. Hilmar Unified would provide busing in a manner consistent with its existing school site operations.

For these reasons, and with implementation of the recommended mitigation measure, the project would be consistent with applicable transportation programs, plans, ordinances, and policies pertaining to bicycle and pedestrian transportation as well as transit. Development and operation of the project will be consistent with the overarching aims of increasing utilization of walking and bicycling facilities, increasing the access provided by this network, and providing a network that is safe and equitable. Additionally, it is worth noting that the project will fulfill a strategy of the Hilmar Community Plan to provide additional school sites away from Lander Avenue to serve current and future residents.

Mitigation Measure T-1: Bicycle and Pedestrian Facility Improvements

- **T-1:** The District shall coordinate with the County of Merced Public Works Department to determine the appropriate implementation schedule for the District installation of a Class II Bike Lane and walkways that are Americans With Disabilities Act (ADA)-compliant along the project's frontage to Geer Avenue.

Level of Significance After Mitigation: With implementation of the mitigation measure provided above, the impacts of the project would be less than significant.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. CEQA Guidelines section 15064.3 describes specific considerations for evaluating a project's transportation impacts and provides that, generally, vehicle miles traveled is the most appropriate measure of transportation impacts. 15064.3(b)(1) addresses land use projects as follows:

> *Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.*

As indicated in the TIA, the project's average vehicle miles traveled (round-trip) is estimated to be 9.74 miles for the modified Elim Elementary campus and 9.67 miles for the new Elementary campus. The 2018 Regional Transportation Plan (RTP) prepared by the Merced County Association of Governments (MCAG) indicates the average trip length under an "Infill Emphasis" focus is 14.62 miles for the region defined by

the County. Per the analysis presented in the TIA, the 15 percent VMT reduction threshold is 12.43 miles. Since the Project's VMT is projected to be below the VMT reduction threshold, the project does not conflict with 15064.3(b).

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

Less Than Significant Impact. The project is not anticipated to substantially increase potential transportation hazards related to geometric design features or incompatible uses. The proposed school facilities are similar to and compatible with existing uses in the surrounding area. During development and operation of the project, Hilmar Unified will work with Merced County to ensure compliance with policies and standards pertaining to transportation access at the site. Additionally, implementation of the mitigation measure identified in Section 17(a) would further reduce the potential for hazards. For these reasons, the project would result in a less than significant impact related to hazards due to roadway design features or incompatible uses.

d. Result in inadequate emergency access?

Less Than Significant Impact. As demonstrated by the site plan for the new facilities, adequate emergency access will be provided as part of the new facilities and will not interfere with emergency access to existing facilities to the north. Emergency access may be hindered during periods of construction, but alternative routes would be available.

18. Tribal Cultural Resources

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

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or**
- **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.**

Less Than Significant Impact with Mitigation Incorporated. During preparation of this Initial Study, the District contacted the Native American Heritage Commission (NAHC) in order to request a Native American Contacts List and Sacred Lands File record search for the project site area. The NAHC's response letter indicated the results of the Sacred Lands File record search were negative. The NAHC letter also identified three Native American tribes with possible knowledge of cultural resources in the project area.

In accordance with AB 52, potentially affected tribes were formally notified of this project and were given the opportunity to request consultation on the project. No requests for consultation were received during the 30-day period allotted for such requests, nor were any other comments provided by the tribes in response to the Request for Preliminary Comment that was mailed.

At this time, the District has no information or evidence that Tribal Cultural Resources exist in relation to the site or will be affected by the project. However, it is possible that subsurface resources could exist and be disturbed by project construction activities. The mitigation measure listed below will function avoid and/or reduce potential impacts in the unlikely event that subsurface resources are discovered during construction. With mitigation incorporated, impacts to tribal cultural resources will be less than significant.

Mitigation Measure TC-1: Mitigation for Potential Discovery of Subsurface Resources

- **TC-1:** If tribal cultural resources are discovered during ground disturbing activities, work shall stop in the immediate vicinity of the find and a qualified professional with expertise in tribal cultural resources shall be consulted to recommend an appropriate course of action with the input of potentially affected tribes. If it is determined that the project may cause a substantial adverse change to a tribal cultural resource, mitigation measures to be considered should include those identified in Public Resources Code Section 21084.3.

19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?		✓		

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✓	
c. Result in determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			✓	
d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			✓	
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			✓	

Would the project:

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

Less Than Significant Impact with Mitigation Incorporated. The impact of the proposed project on utilities serving the project would be less than significant, except for storm drainage, which would be less than significant with mitigation incorporated. The reasons for these conclusions are as follows:

Water and Wastewater

The project site is within the community of Hilmar and would receive its water supply and wastewater collection and treatment services from the Hilmar County Water District (Hilmar CWD). There are existing water and wastewater connections present at the project site which serve the District's existing school facilities. Details of the proposed project were distributed to Hilmar CWD for review and comment, and no response has been provided which indicates the need for substantial water and/or wastewater system improvements. The proposed project will be subject to the payment of any applicable connection charges and/or fees and extension of services in a manner which is compliant with Hilmar CWD standards, specifications, and policies. Additionally, as discussed in Sections 19(b) and (c), the project is not anticipated to require indirect off-site expansions of the water or wastewater systems which serve the project.

Storm Drainage

Storm drainage services at the project site and its vicinity are administered by Hilmar CWD and the County of Merced. According to information from the Merced County Water & Sewer Providers Municipal Service Review (MSR), Hilmar CWD's storm drainage services are distributed between two planning areas separated by Highway 165 (Lander Avenue). As described in the MSR, "Each planning area has a booster lift station, which are connected with storage basins by an underground pipe system. Irwin, the southern area of Hilmar, has no drainage system and the rest of the community disposes its storm water into the Turlock Irrigation District (TID) Lateral No. 7." (Merced County Water & Sewer Providers MSR, September 2020)

The Merced County Water & Sewer Providers MSR indicates that existing facilities do not meet demand for storm water as the TID Lateral No. 7 no longer accepts new discharges into its facilities. As a temporary solution, Hilmar CWD uses a non-operational golf course and smaller sites located throughout Hilmar to dispose of storm water during peak storm periods. The MSR states, "Before any new development may occur with the District, it is required to show there will be no increase in discharge to the drainage system.

Currently, six potential basin sites are being proposed to meet future demand. In addition, the District will need to install a 30- inch pipe to a new Pumping Station 1 and a 24-inch trunk line at proposed Detention Basin 5 in order to meet future demand."

The Merced County General Plan Draft EIR states that the storm water drainage system for any proposed development within the County of Merced must be designed in accordance with the Merced County Department of Public Works Storm Drainage Design Manual. The Storm Drainage Design Manual requires that drainage collection and transmission infrastructure be designed to pass the 5-year, 24-hour storm. In addition, County standards require that increased run-off due to new development be metered to discharge at a rate not to exceed that occurring prior to development from a two-year storm, unless the flow is first contained in a basin. When the latter occurs, the maximum rate of discharge is limited to that necessary to empty the basin within 48 hours.

Storm water runoff anticipated for the proposed elementary campus facilities would be consistent with the levels associated with the project site's land use designation in the Hilmar Community Plan and other long-range planning documents. As the project entails removal of turfed athletic field areas and the installation of new impervious surfaces from new buildings, hardscapes, and parking areas, the project would increase storm water runoff compared to existing conditions at the site.

To ensure storm water runoff is appropriately managed, the project may require an agreement with either Hilmar CWD or the County of Merced to accept stormwater from the project (which in turn, may require a showing of no net increase in discharge to the drainage system), or the project may require installation of an on-site retention basin to accommodate runoff from the project. There is sufficient land available at the project site and other immediately-adjacent land owned by Hilmar Unified to accommodate a retention basin. Development of a retention basin would be subject to compliance with Merced County requirements for designing and constructing any necessary storm drainage facilities, as well as numerous other applicable federal, state, and local regulations related to storm drainage.

Mitigation Measure US-1: Provision of Storm Drainage Facilities

- **US-1:** Prior to operation of the project, the District shall undertake one of the following courses of action to provide for storm drainage at the project site:
    a. Submit details of the project to the Hilmar County Water District (Hilmar CWD) and the County of Merced, and if necessary, enter into an agreement for acceptance of storm water runoff generated from development of the project. Such an agreement may be subject to the requirement of showing there will be no net increase in discharge to the drainage system as a result of accepting runoff generated from the project.
    b. Install on-site storm water retention facilities capable of retaining storm water runoff generated from development of the project. Development of retention facilities would be subject to compliance with all applicable Merced County requirements for designing and constructing any necessary storm drainage facilities, as well as all other applicable federal, state, and local regulations related to the provision of on-site storm drainage facilities.

Level of Significance After Mitigation: With implementation of the mitigation measure provided above, impacts of the project related to storm drainage facilities would be less than significant.

Electric Power, Natural Gas, and Telecommunications

The project site is located in a previously developed area with existing electrical and natural gas service utilities in place as well as telecommunications facilities such as cellular towers and broadband internet connections. Development of the project will be subject to compliance with applicable rules, regulations, and policies regarding connections to these utilities. As such, any impacts that would occur related to relocation or construction of electrical, natural gas, or telecommunications facilities would be less than significant.

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

Less Than Significant Impact. The project site is within the service area of the Hilmar County Water District (Hilmar CWD) and would connect to Hilmar CWD's community water system for its water supply. According to information provided in Merced County's Municipal Service Review for Water & Sewer Providers (September 2020), Hilmar CWD currently operates two groundwater wells and one back-up well located two miles north of Hilmar and have a total production capacity of 2.3 million gallon per day (mgd). Hilmar CWD estimates that average demand is 1 mgd and peak demand is 1.9 mgd or 83 percent of production capacity. Hilmar CWD indicates that facilities are adequate to serve infill projects within its current boundaries but would need system improvements to meet increased demand. Consequently, Hilmar CWD is actively seeking out potential well sites to solidify their system. Additionally, the Hilmar CWD Board has internally discussed potentially studying the consolidation of water facilities with the Country Club Water District, although no formal efforts are currently underway and direct conversations have not taken place.

There are several factors present which suggest the project will have sufficient water supplies available for its operation. The project is located within an already-served infill area, and its operational nature (i.e., elementary school facilities) is consistent with the type of development that has been designated and planned for at the location in the Hilmar Community Plan and other long-range planning documents. Since most of the users at the new K-2 elementary campus would be offset by the decrease in student capacity at the Elim campus, the net increase in water demand related to new student capacity is relatively small. Additionally, the new campus facilities would be sited on an area that currently consists of irrigated turf, and removal of the turfed areas would further offset changes in water demand resulting from development of the project. Based on these factors, this impact is less than significant.

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

Less Than Significant Impact. The project is within the service area of Hilmar CWD's wastewater system and is planned to connect to the system. According to information provided in Merced County's Municipal Service Review for Water & Sewer Providers (September 2020), Hilmar CWD provides wastewater service to approximately 1,558 connections and operates a wastewater treatment plant with five lift stations and five basins. The wastewater treatment system has a total capacity of 1 mgd but is currently permitted 0.55 mgd. The system's average demand is 0.28 mgd and its peak demand is 0.40 mgd or 73 percent of treatment capacity. Although Hilmar CWD reports that existing facilities are adequate to meet current demand, it has explored a potential private public partnership with a local cheese processing plant, Hilmar Cheese Company. In 2012, Hilmar CWD conducted an MSR to provide basis for expanding its SOI to accommodate Hilmar Cheese Company's office expansion. According to the MSR, the District's wastewater facilities would need a new wastewater treatment plant with a capacity of 1.4 mgd, two new sewer trunk lines, and two new lift stations to meet capacity at buildout of the Hilmar Community Plan with an estimated population of 11,000.

For reasons similar to those discussed regarding water supply availability, it is anticipated that adequate wastewater treatment capacity is available to serve the project. Given that the project's location is within an already-served infill area, that its operational nature (i.e., elementary school facilities) is consistent with the type of development that has been designated and planned for at the site, and that many users at the new campus will consist of what are essentially existing users at the Elim campus shifting to new adjacent facilities, the resulting net change in wastewater generation will be relatively minor. Based on these factors, this impact is less than significant.

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impar the attainment of solid waste reduction goals?

Less Than Significant Impact. The project is not anticipated to generate solid waste in excess of state or local standards, or in excess of local infrastructure capacity, or otherwise impair the attainment of solid waste reduction goals. According to data available on CalRecycle's Solid Waste Information System (SWIS),

both the Highway 59 Landfill and Billy Wright Landfill are currently operating within the conditions and limits of their permits, and both facilities have substantial capacity to accommodate waste. (CalRecycle, 2020). The proposed education campus is consistent with the land use designations in the Merced County General Plan and Hilmar Community Plan for the project site, so it would not deviate from County-wide planning and decision-making related to solid waste. Additionally, the District operates its existing facilities in compliance with applicable statutes and regulation related to solid waste and would continue to do so upon development and operation of the proposed project. Based on this information, the project's impact would be less than significant.

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

Less Than Significant Impact. The District operates its existing facilities in compliance with applicable statutes and regulation related to solid waste and would continue to do so upon development and operation of the proposed project. There would be no change to existing conditions that would result in noncompliance with federal, state, and local management and reduction statutes and regulations related to solid waste.

20. Wildfire

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

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

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

No Impact. No impacts related to wildfire would result from the project. The community of Hilmar is not located within a State Responsibility Area (SRA) or any area classified as high-risk for wildfire.

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

No Impact. This impact is addressed in Section 20(a).

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

No Impact. This impact is addressed in Section 20(a).

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

No Impact. This impact is addressed in Section 20(a).

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		✓		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)			✓	
c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?		✓		

a. Does the proposed school project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation Incorporated. Based on the information in Part E, Sections 5 and 18, the project could have potentially significant effects on cultural resources and tribal cultural resources, but these effects would be less than significant with the incorporation of the mitigation measures provided. As discussed in Part E, Section 4, potential impacts to biological resources would be less than significant with mitigation.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)

Less Than Significant Impact. Based on the information in Part E, Sections 1 through 20, the proposed project would not have any impacts that would be individually limited but cumulatively considerable.

c. Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. Based on the information in Part E, Sections 3 and 13, the proposed school project could potentially have substantial adverse effects on human beings with respect to air quality and noise. However, mitigation measures have been incorporated in the project that would reduce the impacts to insignificance.

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F. Mitigation Monitoring and Reporting Program

1. Purpose

The District has prepared this Mitigation Monitoring and Reporting Program to comply with Section 15097 of the State CEQA Guidelines. The purpose for the Mitigation Monitoring and Reporting Program is to ensure implementation of the mitigation measures identified in this Initial Study.

2. Lead Agency

Hilmar Unified School District will undertake the project and is the Lead Agency for the project. The District is responsible for the implementation of all mitigation measures identified in this Initial Study.

3. Mitigation Monitoring and Reporting Coordinator

The Director of Capital Projects, Operations & Safety, or his/her/their designee shall act as the Project Mitigation Reporting Coordinator ("Coordinator").

4. Monitoring and Reporting Procedures for Design-, Site Clearing-, and Construction Mitigation Measures

a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project engineer and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.

b. Prior to award of bid, the Coordinator shall determine that all project design-, site clearing- and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.

c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.

d. Prior to the District accepting the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational- and Maintenance-Related Mitigation Measures

Before the project becomes operational, the Coordinator shall determine that the project operational plans and procedures incorporate all operations-related mitigation measures.

G. Names of Persons Who Prepared or Participated in the Initial Study

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H. Sources Consulted

Following are the documents and other sources consulted in preparing this Initial Study:

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