

ADDENDUM TO AGENDA  
ELK GROVE UNIFIED SCHOOL DISTRICT  
Regular Meeting of the Board of Education  
Board Room, Education Center  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624  
October 7, 2014  
Closed Session – 4:30 p.m.  
Regular Session – 6:00 p.m.

<u>Item</u>	<u>Time – Approximate</u>
CLOSED SESSION – 4:30 p.m.	
4. Government Code Section 54956.9(d)(1) Conference with Legal Counsel - Existing Litigation Name of Case: Case No. BC410135 – <b>Add Case No ADJ7554577</b>	
XI. Discussion/Action Items	
9A. Replacement Bus Lease	10 Minutes

**AMERICAN WITH DISABILITIES COMPLIANCE NOTICE**

In compliance with the Americans with Disabilities Act, those requiring special assistance to access the Board meeting room, to access written documents being discussed at the Board meeting, or to otherwise participate at Board meetings, please contact the Board Secretary, Arlene Hein, at (916) 686-7700. Notification of at least 24 hours prior to the meeting will enable the District to make reasonable arrangements to ensure accessibility to the Board meeting and to provide any required accommodation, auxiliary aids or services.

**DOCUMENT AVAILABILITY**

Documents provided to a majority of the Governing Board regarding an open session item on this agenda will be made available for public inspection in District office located at 9510 Elk Grove-Florin Road, Elk Grove, CA during normal business hours.

ELK GROVE UNIFIED SCHOOL DISTRICT

Agenda Item No. 9A

Board Agenda Item

Supplement No.

Meeting Date: October 7, 2014

**Subject:**

Replacement Bus Lease

**Department:** Finance & School Support

**Action Requested:**

The Board is asked to discuss and approve the redirection of funds.

**Discussion:**

The Board asked staff to make recommendations regarding the possibility of funding the 2014-15 proposed budget priority for student fees (\$300,000) and a Board interest to continue the field trip program associated with the nutrition education program (approximately \$25,000), by redirecting previously approved budget priority allocation(s). After reviewing the status of implementing the 2014-15 Board approved priorities staff is recommending that the Board consider redirecting \$325,000 of onetime funding from the 2014-15 SISWEB Software Update Project (\$1,000,000) approved budget priority, to fund both the student fees and nutrition education program field trips for the 2014-15 school year.

Additionally, at the April 22, 2014 Board workshop the Board was presented with two options regarding the need to replace approximately 40 buses that each has approximately 500,000 miles driven on them. One option was to replace a portion (approximately 20 buses) of our bus fleet with a onetime allocation and the other option was to replace a larger portion (approximately 31 buses) of our bus fleet by entering into a 10 year lease at approximately \$500,000 per year. At the April 22, 2014 meeting the Board approved a onetime budget priority to replace approximately 20 buses buy allocating \$3,000,000 in funding for the 2014-15 school year. Due to changes in the final State budget for schools the Board requested that staff review and make a recommendation regarding the two original options for the budget priority to replace the District's aging bus fleet. Based on the final State budget staff is recommending that the Board consider authorization of a 10 year lease program to replace up to 31 buses at approximately \$500,000 per year. This recommendation would also increase the Undesignated Fund Balance in the current Multi-Year Projection by approximately \$1,500,000 in onetime funding.

**Financial Summary:**

Redirection of existing budget priority funds.

Prepared By: Jill Gayaldo

Division Approval: Rich Fagan

Prepared By:

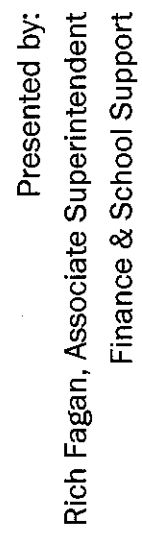
Superintendent Approval: Mark Cerutti, Interim Superintendent

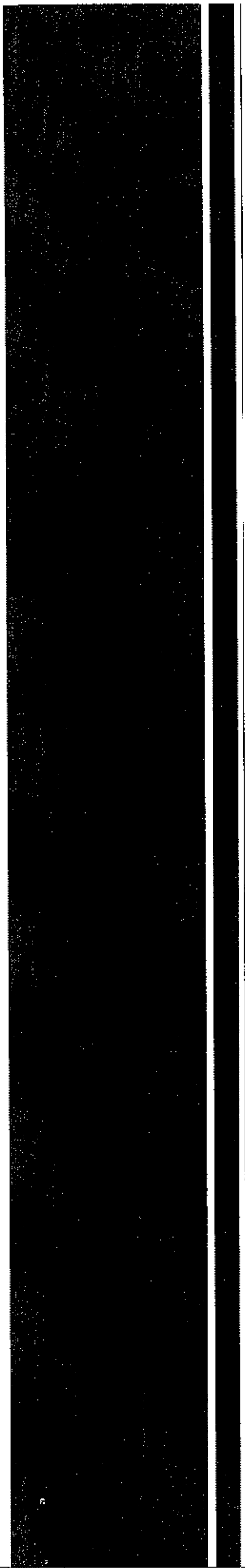
# **Attachment**

*October 7, 2014*  
**Board Meeting**

**Agenda Item**  
**# 12**

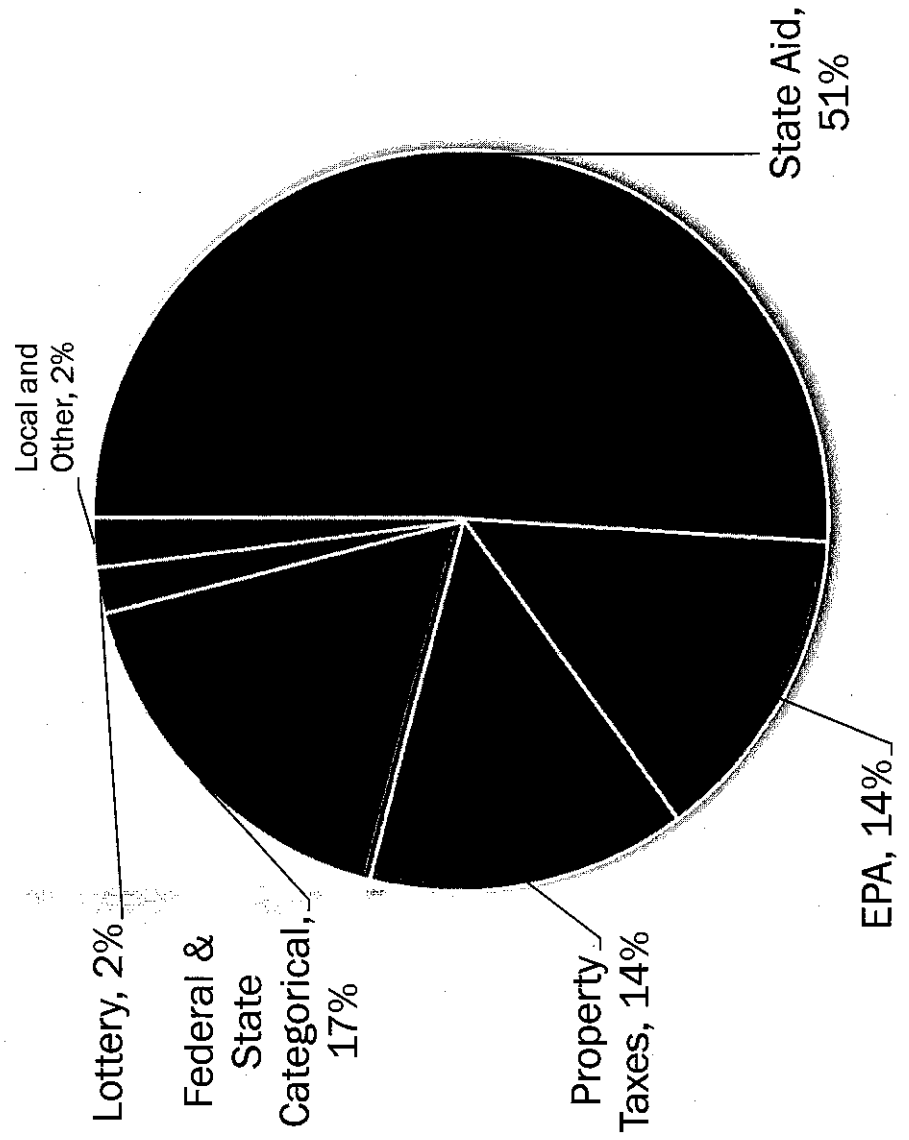
## This image shows a blank page from a document. The page is mostly white with some minor scanning artifacts. There are prominent dark vertical bars along the left and right edges, likely representing the binding or gutter of the book. No text or other markings are visible on the page.



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- ☐ 2013-14 Proposed Unaudited Actuals Revenue & Expenditure Charts
  - ☐ 2013-14 Education Protection Account Expenditures
  - ☐ 2013-14 Changes from Estimated Actuals
  - ☐ 2014-15 Budget Update
  - ☐ Next Steps

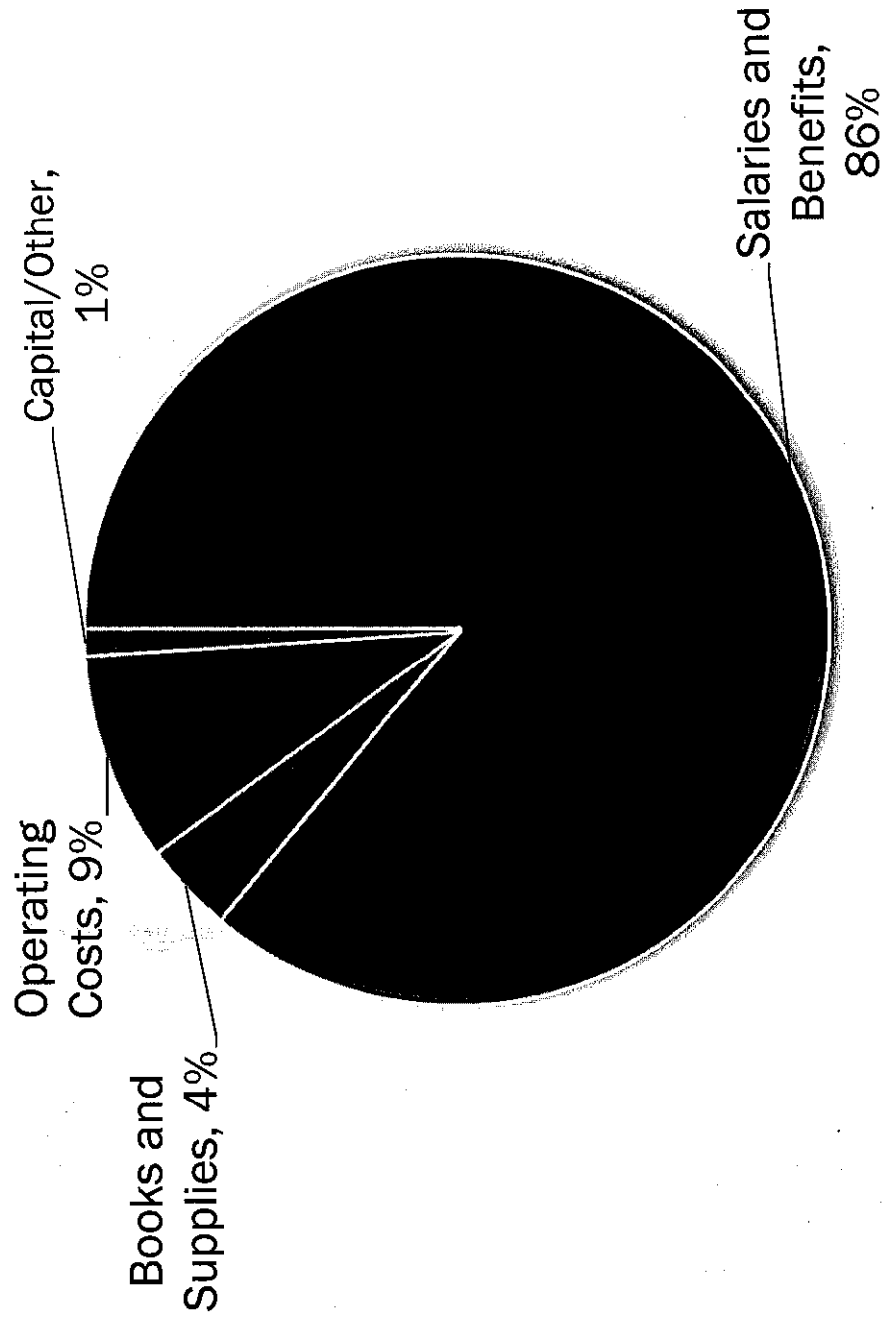
# TOTAL GENERAL FUND (Unrestricted & Restricted)

2013-14 Proposed Revenue Resources

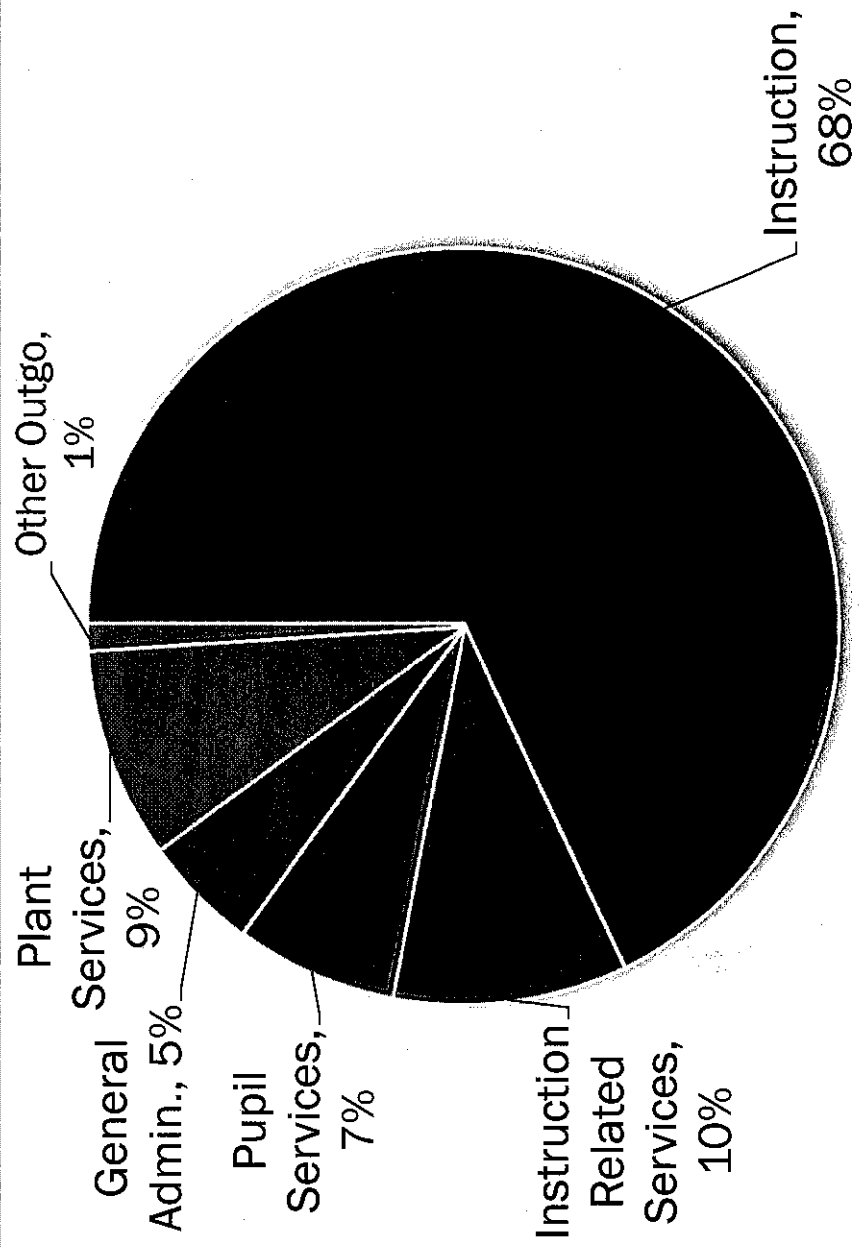


# TOTAL GENERAL FUND (Unrestricted & Restricted)

2013-14 Proposed Expenditures



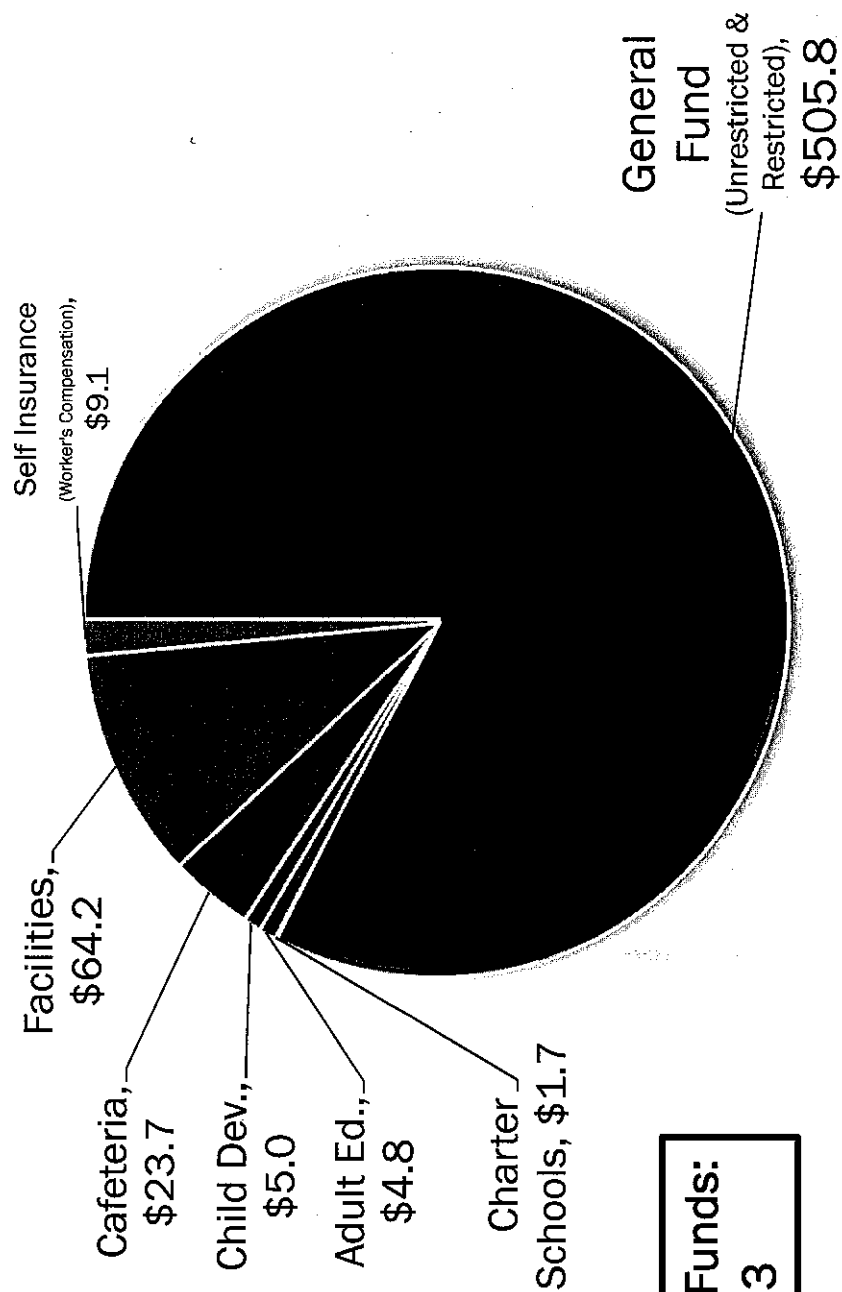
**TOTAL GENERAL FUND (Unrestricted & Restricted)**  
2013-14 Proposed Expenditures by Function






# 2013-14 PROPOSED EXPENDITURES BY FUND

(\$million)



- 
- § In accordance with the implementation of Proposition 30 Districts are required to expend EPA funds on instructional and instruction related expenditures
  - § Elk Grove has allocated a portion of classroom teacher salaries and benefits for grades TK through 3 to satisfy this requirement as approved by the Board
  - § Detailed revenue and expenditure information will be uploaded to the District's website upon approval of the 2013-14 Unaudited Actuals as required by Ed. Code
  - § For fiscal year 2013-14 the amount of EPA was \$69m which is approximately \$9m more than projected at 2<sup>nd</sup> Interim

### 2013-14 Revenue Variances

Additional State Revenue (LCFF) from increased Special Education ADA  
(189) plus an increase to closure of LCFF Funding Gap (0.22%)  
Additional Special Education Revenues from increased ADA  
Additional one-time ERATE and Lottery Revenue  
Total

\$1.6m  
\$0.5m  
\$0.3m  
\$2.4m

### 2013-14 Expenditure Variances

Estimated Transition Attrition Calculation (contra \$5m)  
EGUSD retiree (pre 2000) Health Care Premium savings  
Unexpended balance from Summer School/Extended Day/  
Intercession (6/1/14 – 5/29/15)  
Unexpended balance from site EL and Supplemental Funds  
Unexpended Textbooks, Print Shop and Site Supplies  
Energy and Utilities Savings

(\$1.9m)  
\$1.0m  
\$2.4m  
\$1.9m  
\$0.9m  
\$0.4m  
\$4.7m

Total

### Net Change

\$7.1m

Estimated Undesignated Reserve for Budget Priorities (Est. Act.) \$16.2m

Change in Unrestricted General Fund Operations \$ 7.1m

Designated Carryover Reserves:

Transportation Inventory Reserve (\$0.5m)

ROP/Career Tech Support Reserve (\$1.0m)

Site Shared Energy Savings (\$0.1m)

Summer School/Extended Day/Intersession (\$2.4m)

Other Miscellaneous Adjustments (\$0.1m)

Adjusted Change to Unrestricted

General Fund Balance

(\$4.1m)

Adjusted Reserve for Budget Priorities

\$19.2m

	ADOPTED	UNAUDITED ACTUALS	1ST INTERIM	2ND INTERIM	ESTIMATED ACTUALS	UNAUDITED ACTUALS
Revenue	\$ 383,441,810	\$ 383,719,766	\$ 385,957,769	\$ 395,730,782	\$ 394,246,085	\$ 404,479,228
Contributions/Transfers	(50,644,425)	(51,029,356)	(54,614,096)	(67,668,389)	(66,303,278)	(71,644,181)
Salary and Benefits	(319,835,423)	(319,341,101)	(330,036,530)	(328,097,881)	(327,936,679)	(328,838,560)
Supplies and Operating	(29,247,585)	(29,247,585)	(28,081,233)	(28,423,372)	(31,895,341)	(27,471,698)
Indirect and Transfers	6,017,555	6,009,412	6,946,542	7,505,770	7,347,762	6,003,899
<b>SURPLUS/(DEFICIT)</b>	<b>\$ (10,268,068)</b>	<b>\$ (9,888,864)</b>	<b>\$ (19,827,548)</b>	<b>\$ (20,953,090)</b>	<b>\$ (24,541,451)</b>	<b>\$ (17,471,312)</b>
Projected Beginning Fund Balance	54,523,609	51,751,242	51,751,242	51,751,242	51,751,242	51,751,242
Contingency 2% Reserve	(10,276,347)	(10,301,517)	(11,001,517)	(11,001,517)	(11,001,517)	(11,401,055)
Designated Carryover Reserves	-	(1,376,525)	-	-	-	(3,637,290)
Reserve for Future Year Deficit	(33,979,194)	(30,184,336)	(20,922,177)	-	-	-
Spending	-	-	-	-	-	-
<b>UNDESIGNATED BALANCE</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ 19,796,635</b>	<b>\$ 16,208,274</b>	<b>\$ 19,241,584</b>

ITEM	2014-15 45 DAY REVISE	2015-16	2016-17
State Revenue	\$ 437,238,291	\$ 433,319,343	\$ 433,319,343
Estimated 2015-16		22,179,711	22,179,711
Estimated 2016-17			13,542,977
Contributions/Transfers	(51,363,981)	(56,685,340)	(59,293,200)
Salary and Benefits	(354,090,886)	(360,772,110)	(375,767,709)
Supplies and Operating	(41,240,040)	(34,647,774)	(34,898,775)
Indirect and Transfers	4,302,577	7,564,058	7,755,641
<b>SURPLUS/(DEFICIT)</b>	<b>\$ (5,154,039)</b>	<b>\$ 10,957,888</b>	<b>\$ 6,837,988</b>
Estimated Beginning Fund Balance	27,209,791	22,055,752	33,013,640
<b>Ending Fund Balance</b>	<b>22,055,752</b>	<b>33,013,640</b>	<b>39,851,628</b>
Contingency Mandated 2% Reserve	11,111,517	11,111,517	11,301,517
Reserve for Funding Priorities	10,944,235	21,902,123	28,550,111
<b>UNDESIGNATED</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

ITEM	2014-15 UNAUDITED ACTUALS	2015-16	2016-17
State Revenue	\$437,238,291	\$433,319,343	\$433,319,343
Estimated 2015-16		22,179,711	22,179,711
Estimated 2016-17			13,542,977
Contributions/Transfers	(51,363,981)	(56,685,340)	(59,293,200)
Salary and Benefits	(354,090,886)	(360,772,110)	(375,767,709)
Supplies and Operating	(41,240,040)	(34,647,774)	(34,898,775)
Indirect and Transfers	4,302,577	7,564,058	7,755,641
<b>SURPLUS/(DEFICIT)</b>	<b>\$ (5,154,039)</b>	<b>\$ 10,957,888</b>	<b>\$ 6,837,988</b>
Estimated Beginning Fund Balance	34,279,930	29,125,891	40,083,779
<b>Ending Fund Balance</b>	<b>29,125,891</b>	<b>40,083,779</b>	<b>46,921,767</b>
Contingency Mandated 2% Reserve	11,301,055	11,511,055	11,701,055
Designated Carryover Reserves	3,637,290	3,637,290	3,637,290
Reserve for Funding Priorities	14,187,546	24,935,434	31,583,422
<b>UNDESIGNATED</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

2013-14 Unaudited Actuals	October 7, 2014
2014-15 1 <sup>st</sup> Interim Report	December 2014
2013-14 Independent Auditor's Report	December 2014
2015-16 Governor's Budget Proposal	January 2015
2014-15 2 <sup>nd</sup> Interim Report	March 2015



# **Attachment**

***October 7, 2014***  
**Board Meeting**

**Agenda Item**  
**# 14**

October 2014 | Final Mitigated Negative Declaration and Initial Study

# ANATOLIA II ELEMENTARY SCHOOL

for Elk Grove Unified School District

State Clearinghouse No. 2014082080

*Prepared for:*

**Elk Grove Unified School District**

Contact: Bill Heinicke, Director, Planning  
9510 Elk Grove-Florin Road  
Elk Grove, California 95624  
916.686.7711

*Prepared by:*

**PlaceWorks**

Contact: Dwayne Mears, AICP Principal  
3 MacArthur Place, Suite 1100  
Santa Ana, California 92707  
714.966.9220  
info@placeworks.com  
www.placeworks.com





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# 1. Mitigated Negative Declaration

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## 1.1 PROJECT INFORMATION

Pursuant to the State of California Public Resources Code and the "Guidelines for Implementation of the California Environmental Quality Act," as amended, the Elk Grove Unified School District (District or EGUSD) has completed an Initial Study for the project described below:

**Project Name:** Anatolia II Elementary School

**Project Location:** The project site is at the southwest corner of Appolon Drive and Sophistry Drive in the Anatolia master-planned community in the Sunrise Douglas Community Plan/Sunridge Specific Plan, City of Rancho Cordova, Sacramento County, California. The project site is bounded by Sandpiper Park on the west, residential developments on the north and east, and a bike path to the south, beyond which is the AKT Communities Wetland Preserve.

**Project Description:** The District proposes to construct a new elementary school of approximately 70,000 square feet to accommodate 900 students under a traditional schedule, with provisions for future expansion to 1,100 students. The school may convert to a multitrack, year-round schedule, which would allow the number of students enrolled at the school to increase to 1,400. However, the number of students attending classes on campus would not exceed 1,100 students during any session. The project would have administrative offices, classrooms, a library, and a cafeteria/multipurpose room. In addition, the project would provide outdoor athletic/recreational facilities with features such as hard courts and turf play fields.

## 1.2 MITIGATION MEASURES

The District's Board of Education, having reviewed the Initial Study of this proposed project and recommendation of the District staff, hereby find and declare that the proposed project will not have a significant effect on the environment with the implementation of mitigation measures as identified below:

### Air Quality

- AQ-1      The construction contractor shall only use Tier-3 off-road vehicles (50 hp or more) to minimize construction NOx emissions from off-road equipment exhaust. This shall be specified in the construction bid and monitored by Elk Grove Unified School District during the entire construction duration.

### Biological Resources

- BIO-1      The EGUSD shall implement one of the following two measures to address impacts to nesting birds that are protected under the Migratory Bird Treaty Act or California Fish and

## 1. Mitigated Negative Declaration

Game Code, Section 3503, but are not protected under other regulations (e.g., state or federal Endangered Species Act).

- i) The EGUSD shall have a preconstruction survey conducted by a qualified biologist on the project site. The preconstruction survey shall be consistent with the requirements of mitigation measure BR-8 in the Sunrise Douglas Community Plan/SunRidge Specific Plan EIR. In addition, the species and location of nesting birds (if any) will be identified and mapped on an appropriate scale base map of the project site. Avoidance zones of (1) 60 feet from each nest (for species other than raptors) or (2) 300 feet from each nest (for raptors) shall be observed during the nesting season (i.e., nest building to fledging of young). The nesting season shall be determined through monitoring of the nests by a qualified biologist (to determine when nests have been abandoned and are no longer in use). Only after the nesting season ends (i.e., nests have been determined to be abandoned) shall clearing or development proceed.
- ii) Clearing of the project site may be allowed during a limited operating period between September and January (i.e., no clearing or development shall begin earlier than September 1 or later than January 31). It should be noted that use of a limited operating period does not require site clearance for nesting birds by a qualified biologist. Furthermore, construction activities may proceed past January 31 as long as the site has been cleared of potential nesting habitat prior to this date.

BIO-2 The EGUSD shall implement the following measures to address impacts to burrowing owls.

- i) The applicant shall have a preconstruction survey for burrowing owls within the project site conducted by a qualified biologist. The survey shall be conducted consistent with the guidelines provided by the Staff Report on Burrowing Owl Mitigation (CDFW 2012) or most recent published guidance from the California Department of Fish and Wildlife (CDFW).
- ii) If burrowing owls are found on the project site, no clearing or development shall be allowed within 250 feet of any burrow determined to be occupied by owls during the breeding season (i.e., February 1 to August 31) or within 160 feet of any burrow determined to be occupied by owls during the nonbreeding season (i.e., September 1 to January 31).
- iii) If occupied burrows must be destroyed, no destruction of burrows shall occur during the breeding season. Burrows may be destroyed during the nonbreeding season, but only if all burrowing owls have been passively relocated more than 160 feet outside of the project site consistent with the guidance in the Staff Report on Burrowing Owl Mitigation (CDFW 2012).

## 1. Mitigated Negative Declaration

- iv) To offset the loss of foraging and burrow habitat, the applicant shall enter into a Memorandum of Understanding (MOU) with the CDFW that provides long-term protection of foraging habitat at an offsite location adjacent to occupied burrowing owl habitat. The offsite location should be acceptable to the CDFW and at a minimum convey 6.5 acres of suitable foraging habitat for each unpaired individual or pair of burrowing owls affected. Conveyance of the offsite habitat shall be through purchase of a conservation easement or fee title.

### Cultural Resources

CULT-1 If prehistoric or historical archaeological deposits are discovered during project activities, all work within 25 feet of the discovery shall be redirected, the District Planning Division shall be contacted directly, and a qualified archaeologist shall be contacted to assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Preservation in place shall be implemented if feasible. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by the project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction to avoid archaeological sites, incorporating sites into open spaces, covering sites with stable soils, and deeding the site into a permanent conservation easement. Project personnel should not collect or move any archaeological materials or human remains and associated materials. Archaeological resources can include flaked-stone tools (e.g., projectile points, knives, choppers) or obsidian, chert, basalt, or quartzite toolmaking debris; bone tools; culturally darkened soil (i.e., midden soil often containing heat-affected rock, ash and charcoal, shellfish remains, faunal bones, and cultural materials); and stone-milling equipment (e.g. mortars, pestles, handstones). Prehistoric archaeological sites often contain human remains. Historical materials can include wood, stone, concrete, or adobe footings, walls, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, metal, and other refuse.

CULT-2 If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet must stop, and the District Planning Division shall be notified. A qualified archeologist shall inspect the findings within 24 hours of discovery. Cultural resources shall be recorded on California Department of Parks and Recreation Form 523 (Historic Resource Recordation form). If it is determined that the proposed development could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. Preservation in place shall be implemented if feasible. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by a project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction to avoid archaeological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent





## 1. Mitigated Negative Declaration

conservation easement. Under CEQA Guidelines, when preservation in place is not feasible, data recovery through excavation shall be conducted with a data recovery plan in place. Therefore, when considering these possible mitigations, the District Planning Division shall have a preference for preservation in place.

### Transportation and Traffic

- T-1 Prior to school opening, the District shall work with the City of Rancho Cordova to provide applicable striping and/or street widening on Appolon Drive to reduce the effects of queuing at the school access. The District shall monitor conditions at the Appolon Drive/Sophistry Drive intersection and provide manual traffic control personnel as needed. The District shall widen the driveway on Sophistry Drive to permit two exiting travel streams and shall work with the City of Rancho Cordova to install an all-way stop.
- T-2 Prior to the opening of Anatolia II Elementary School, the District shall work with the City of Rancho Cordova to identify an appropriate package of school zone signing and parking controls to minimize pedestrian activity at uncontrolled locations and create an applicable "Safe Route to School" plan. In addition, the District shall continue to educate parents and students about the safety concerns related to on-street drop-off and pick-up.
- T-3 The District and City of Rancho Cordova shall work to prepare and implement a Parking Management Plan for large events that directs traffic to hardcourt parking and identifies problem locations where on-street parking may need to be prohibited during these events.

## 1. Mitigated Negative Declaration

On the basis of this initial evaluation:

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



Bill Heinicke  
Signature

Bill Heinicke, Director of Planning  
Printed Name

2014-10-01  
Date

EGUSD  
For

## 1. Mitigated Negative Declaration

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## 2. Response to Comments

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This section provides all written responses received on the Mitigated Negative Declaration/Initial Study (MND/IS) and the District's responses to each comment.

The following is a list of agencies and persons that submitted comments on the MND/IS during the public review period between August 26, 2014 and ending September 24, 2014, and the related responses are provided below.

Number Reference	Commenting Person/Agency	Date of Comment	Page No.
<b>Agencies &amp; Organizations</b>			
A1	Central Valley Regional Water Quality Control Board	September 19, 2014	2-3
A2	Sacramento Metropolitan Air Quality Management District	September 24, 2014	2-9
A3	WALKSacramento	September 25, 2014	2-17
A4	Department of Toxic Substance Control	September 23, 2014	2-21
A5	Department of Transportation	September 18, 2014	2-27

## 2. Response to Comments

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## 2. Response to Comments

LETTER A1 – Central Valley Regional Water Quality Control Board (4 page[s])



A1

Central Valley Regional Water Quality Control Board  
**RECEIVED**

19 September 2014

SEP 24 2014

FACILITIES AND PLANNING  
ELK GROVE UNIFIED  
SCHOOL DISTRICT

CERTIFIED MAIL

7014 1200 0000 7154 4615

Bill Heinicke  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624

**COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE  
DECLARATION, ANATOLIA II ELEMENTARY SCHOOL PROJECT, SCH NO. 2014082080,  
SACRAMENTO COUNTY**

Pursuant to the State Clearinghouse's 26 August 2014 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Anatolia II Elementary School Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

**Construction Storm Water General Permit**

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction Activities (Construction General Permit), Construction General Permit Order No. 2009-009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

For more information on the Construction General Permit, visit the State Water Resources Control Board website at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml).

KARL E. LONGBLEY ScD, P.E., GHM | PAMELA C. CHESCON P.E., UCEE, EXECUTIVE OFFICER  
11820 Gus Center Drive #200, Rancho Cordova, CA 95670 | [www.waterboards.ca.gov/centralvalley](http://www.waterboards.ca.gov/centralvalley)

RECEIVED FAXES

## 2. Response to Comments

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Anatolia II Elementary School  
Sacramento County

- 2 -

19 September 2014

### **Phase I and II Municipal Separate Storm Sewer System (MS4) Permits<sup>1</sup>**

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/municipal\\_permits/](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/).

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/phase\\_ii\\_municipal.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/phase_ii_municipal.shtml)

### **Industrial Storm Water General Permit**

Storm water discharges associated with industrial sites must comply with the regulations contained in the Industrial Storm Water General Permit Order No. 97-03-DWQ.

For more information on the Industrial Storm Water General Permit, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/storm\\_water/industrial\\_general\\_permits/index.shtml](http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/industrial_general_permits/index.shtml).

### **Clean Water Act Section 404 Permit**

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACOE). If a Section 404 permit is required by the USACOE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements.

If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACOE at (916) 557-5250.

---

<sup>1</sup> Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

## 2. Response to Comments

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Anatolia II Elementary School  
Sacramento County

- 3 -

19 September 2014

### **Clean Water Act Section 401 Permit – Water Quality Certification**

If an USACOE permit, or any other federal permit, is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications.

### **Waste Discharge Requirements**

If USACOE determines that only non-jurisdictional waters of the State (i.e., "non-federal" waters of the State) are present in the proposed project area, the proposed project will require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation.

For more information on the Water Quality Certification and WDR processes, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/help/business\\_help/permit2.shtml](http://www.waterboards.ca.gov/centralvalley/help/business_help/permit2.shtml).

### **Low or Limited Threat General NPDES Permit**

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Dewatering and Other Low Threat Discharges to Surface Waters* (Low Threat General Order) or the General Order for *Limited Threat Discharges of Treated/Untreated Groundwater from Cleanup Sites, Wastewater from Superchlorination Projects, and Other Limited Threat Wastewaters to Surface Water* (Limited Threat General Order). A complete application must be submitted to the Central Valley Water Board to obtain coverage under these General NPDES permits.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0074.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0074.pdf)

For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

[http://www.waterboards.ca.gov/centralvalley/board\\_decisions/adopted\\_orders/general\\_orders/r5-2013-0073.pdf](http://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2013-0073.pdf)



## 2. Response to Comments

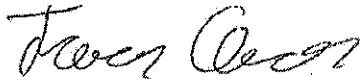
Page 4/4

Anatolia II Elementary School  
Sacramento County

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19 September 2014

If you have questions regarding these comments, please contact me at (916) 464-4684 or  
tcleak@waterboards.ca.gov.



Trevor Cleak  
Environmental Scientist

cc: State Clearinghouse Unit, Governor's Office of Planning and Research, Sacramento

## 2. Response to Comments

**A1. Response to Comments from Trevor Cleak, Environmental Scientist, Central Valley Water Quality Control Board, dated September 19, 2014.**

- A1-1 The comments provided by the Central Valley RWQCB are noted, and all applicable requirements will be complied with. The ISMND recognizes these requirements as provided in Section 5.4 - *Biological Resources*, Section 5.6 - *Geology and Soils*, and Section 5.9 - *Hydrology and Water Quality*.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A2 – Sacramento Metropolitan Air Quality Management District (5 page[s])

**A2**



Larry Greene  
AIR POLLUTION CONTROL OFFICER

September 24, 2014

**SENT VIA E-MAIL**

Bill Heinicke, Director of Planning  
Facilities and Planning  
Elk Grove Unified School District  
9510 Elk Grove-Florin Road  
Elk Grove, CA 95624  
wheinick@egusd.net

**RE: Anatolia II Elementary School Mitigated Negative Declaration and Initial Study**

Mr. Heinicke,

The Sacramento Metropolitan Air Quality Management District (SMAQMD) thanks the Elk Grove Unified School District (EGUSD) for the opportunity to evaluate the Mitigated Negative Declaration and Initial Study (MND) for this project. We offer the following comments.

**Operations**

Adopted land use and environmental plans applicable to the site call for pedestrian and bicycle supportive site design and connections to surrounding uses. The SunRidge Specific Plan describes the circulation approach as emphasizing alternatives to automobile use including pedestrian and bicycle systems and public transit. SMAQMD's air quality mitigation plan (AQMP) for the SunRidge planning area is based on assumptions in the adopted plans applicable to the site. Further, the City of Rancho Cordova General Plan Air Quality Element stipulates that all new development be designed to enable easy pedestrian and bicycle access and circulation (AQ.3.1.2). The following recommendations will help ensure safe, comfortable and efficient pedestrian and bicycle circulation.

- Safe routes and crossings from surrounding neighborhoods enable safe pedestrian travel to the school. This is especially important at the Sardonyx Way intersection near the bus drop-off. To ensure safe crossings, we recommend intersections with high visibility crosswalk markings and enhancements to

777 12th Street, 3rd Floor • Sacramento, CA 95814-1908  
916/874-4800 • 916/874-4899 fax  
[www.airquality.org](http://www.airquality.org)

## 2. Response to Comments

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demonstrate maximum pedestrian safety, such as pedestrian signalization, curb extensions, and traffic calming treatments. We recommend high visibility crosswalk markings with enhancements for all crossings adjacent to the school, including the crossing at Sophistry and Appolon, crossings at Muldoon and at Pericles, and crossings at proposed driveways.

- The parking lot creates a barrier to pedestrian transportation from Pericles Drive, a main connector roadway from Rancho Cordova Parkway. The current presence of a worn rut on the site leading directly from Pericles demonstrates that the street funnels pedestrian traffic onto the site from surrounding uses. We recommend parking lot design that safely accommodates pedestrian traffic that will occur, and includes a clearly marked raised pedestrian pathway directly across the parking lot from Pericles to the school office.
- It is not clear whether the MND site map is scaled to accurately depict the configuration of Sardonyx Way and the bus drop off. More specific information on that configuration is necessary to evaluate pedestrian safety and usability there.
- We recommend multiple bicycle access points with bicycle parking. We recommend providing bicycle access points from bicycle paths in the neighborhood park, in addition to access at the front of the school, with bicycle parking for convenience. This will in turn facilitate bicycle access from the bicycle trail along the nature preserve. We recommend the Association of Pedestrian and Bicycle Professionals *Bicycle Parking Guidelines* for bicycle parking design.
- Street widening is associated with increased motor vehicle speeds, which is detrimental to pedestrian safety. The safest left-turn channelization option, in response to proposed mitigation measure T-1, is the second option: prohibit on-street parking on the south side of Appolon Drive. This option is does not entail widening Appolon Drive, would not promote motor vehicle circling and associated emissions, and the MND does not indicate that it may not be "practicable."
- Tree plantings at regular intervals in parking lot buffer zones (where practicable) will promote comfortable pedestrian environments, in addition to other air quality benefits.

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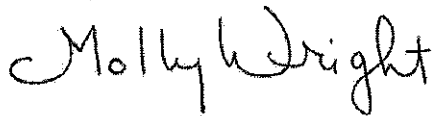
## 2. Response to Comments

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### Construction and General Comments

The project would comply with Basic Construction Emission Control Practices (BCECP), according to the MND, and a listing of these practices is attached. All projects are subject to SMAQMD rules and regulations in effect at the time of construction. The attached rules and regulations statement describes SMAQMD rules which may apply to this project whether the air quality impacts are significant or not. If you have additional questions or require further assistance, please contact me at [mwright@airquality.org](mailto:mwright@airquality.org) or 916-874-4207

Sincerely,



Molly Wright  
Air Quality Planner / Analyst

### Attachments:

- Basic Construction Emission Control Practices
- SMAQMD Rules and Regulations Statement

cc: Larry Robinson, Program Coordinator, SMAQMD

## 2. Response to Comments

Page 4/5

### Basic Construction Emission Control Practices

#### BASIC CONSTRUCTION EMISSION CONTROL PRACTICES

The following practices are considered feasible for controlling fugitive dust from a construction site. Control of fugitive dust is required by District Rule 403 and enforced by District staff.

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.

The following practices describe exhaust emission control from diesel powered fleets working at a construction site. California regulations limit idling from both on-road and off-road diesel powered equipment. The California Air Resources Board enforces the idling limitations.

- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.

Although not required by local or state regulation, many construction companies have equipment inspection and maintenance programs to ensure work and fuel efficiencies.

- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determine to be running in proper condition before it is operated.

Lead agencies may add these emission control practices as Conditions of Approval (COA) or include in a Mitigation Monitoring and Reporting Program (MMRP).

## 2. Response to Comments

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### **SMAQMD Rules & Regulations Statement** (revised 3/12)

*The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):*

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at [www.airquality.org](http://www.airquality.org) or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

**Rule 201: General Permit Requirements.** Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration. Other general types of uses that require a permit include, but are not limited to dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

**Rule 403: Fugitive Dust.** The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

**Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour.** The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

**Rule 417: Wood Burning Appliances.** This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

**Rule 442: Architectural Coatings.** The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

**Rule 460: Adhesives and Sealants.** The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

**Rule 902: Asbestos.** The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

**Naturally Occurring Asbestos:** The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas "Moderately Likely to Contain Asbestos" within eastern Sacramento County. Asbestos Airborne Toxic Control Measures, Section 93105 & 93106 contain specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.



## 2. Response to Comments

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## 2. Response to Comments

**A2. Response to Comments Molly Wright, Air Quality Planner/Analyst, Sacramento Metropolitan Air Quality Management District, dated September 24, 2014.**

A2-1 The goal of creating safe, comfortable and efficient pedestrian and bicycle circulation are shared by the District. The design of the site and its access was a collaborative effort between the district, its design team, the state of California and the City of Rancho Cordova. A balanced approach was taken to meet the needs of all transportation modes while recognizing the requirements of the agencies that have ultimate authority for access / circulation and roadway design issues. The specific recommendations included in this comment letter are well received and will be considered as the District enters into final street design discussions with the City of Rancho Cordova.

The requirement to comply with the Basic Construction Emission Control Practices was acknowledged in the MND.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A3 – Walk Sacramento (2 page[s])



A3

September 24, 2014

VIA EMAIL

Bill Heinicke  
Director, Planning  
Elk Grove Unified School District  
9510 Elk Grove Florin Road  
Elk Grove, CA 95624

**RE: Anatolia II Elementary School Draft Mitigated Negative Declaration and Initial Study  
(EGUS-03.0)**

Dear Mr. Heinicke:

Thank you for the opportunity to comment on the Anatolia II Elementary School Mitigated Negative Declaration and Initial Study. Our comments are in respect to Section 5.16 Transportation/Traffic in the Environmental Analysis.

Mitigation Measure T-1 requires three actions, one of which is striping or widening of Appolon Drive to reduce the effects of vehicle queueing at the school access driveway. Four alternatives were reviewed to reduce the effects of left-turn channelization on Appolon Drive at the school access driveway. The Level of Service failure occurs during a peak 15-minute a.m. period. The IS-MND doesn't indicate whether staggered start times for classes were considered and the impact on peak traffic flow might be. We recommend reviewing this to determine if changes to Appolon Drive and/or manual traffic control at the Appolon Drive-Sophistry Drive intersection would be required.

The Environmental Analysis also indicates that manual traffic control and adult crossing guards to consolidate pedestrian traffic would improve the Level of Service for the Appolon Drive-Sophistry Drive intersection. While this may improve traffic flow through the intersection, it should not be expected to provide safe pedestrian crossings at the Appolon Drive-Sardonix Way and Sophistry Drive-Perides Drive intersections. Even though the crosswalks may not be marked at each of those intersections, the crosswalks will remain unless the City of Rancho Cordova takes the appropriate actions to prohibit pedestrian crossings at those locations.

Each of the intersections will be on direct paths to the school campus and pedestrians will not want to walk out of their way to cross at the Appolon Drive-Sophistry Drive intersection. The Appolon Drive-Sardonix Way intersection has potential conflicts for pedestrians due to the location of the school bus drop-off entrance and the south side of the crosswalks will be at the curb on the backside of the bus area. The Sophistry Drive-Perides Drive intersection will be a logical crossing for pedestrians travelling to or from the area east of the school site. With the campus entrance almost directly in line with the intersection, pedestrians,

909 12<sup>th</sup> Street, Suite #203 • Sacramento, CA 95814 • 916-446-9255  
[www.walksacramento.org](http://www.walksacramento.org)

## 2. Response to Comments

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Page 2 of 2

September 25, 2014

especially children, will desire to cross the intersection at the unmarked crosswalk and walk directly through the parking lot.

WALKSacramento encourages people to walk and bicycle in their communities. The benefits include improved physical fitness, less motor vehicle traffic congestion, better air quality, and a stronger sense of cohesion and safety in local neighborhoods. WALKSacramento is working to support increased physical activity such as walking and bicycling in local neighborhoods as well as helping to create community environments that support walking and bicycling.

Thank you for your consideration of these comments and recommendations. If you have questions or need additional information, please contact me at (916) 446-9255 or [cholm@walksacramento.org](mailto:cholm@walksacramento.org).

Sincerely,

Chris Holm  
Project Analyst

## 2. Response to Comments

### A3. Response to Comments from Chris Holm, Project Analyst, WALKSacramento dated September 25, 2014.

- A3-1 The District shares WALKSacramento's goal of encouraging students to walk and ride bicycles to school and the desire to create a safe pedestrian environment. The design of the site and its access was a collaborative effort between the district, its design team, the state of California and the City of Rancho Cordova. A balanced approach was taken to meet the needs of all transportation modes while recognizing the requirements of the agencies that have ultimate authority for access / circulation and roadway design issues. The traffic analysis completed as part of the Initial Study thoroughly evaluated anticipated traffic volumes, school drop-off operations and likely behavior of student pedestrians. Based on this analysis, the project traffic engineer identified appropriate physical improvements and operational techniques that are expected to create a safe school campus. Additionally, the District will consider the specific recommendations included in the comment letter.

## 2. Response to Comments

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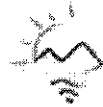
## 2. Response to Comments

LETTER A4 – Department of Toxic Substances Control (3 page[s])

A4



**Matthew Rodriguez**  
Secretary for  
Environmental Protection



### Department of Toxic Substances Control

**Miriam Barcellona Ingenito**  
Acting Director  
8800 Cal Center Drive  
Sacramento, California 95826-3200



**Edmund G. Brown Jr.**  
Governor

September 23, 2014

**Mr. Bill Heinicke**  
Director of Facilities and Planning  
Elk Grove Unified School District  
9510 Elk Grove Florin Road  
Elk Grove, CA 95624

**DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR ELK GROVE  
UNIFIED SCHOOL DISTRICT, ANATOLIA II ELEMENTARY SCHOOL PROJECT,  
ELK GROVE, SACRAMENTO COUNTY (SCH #2014082080)**

Dear Mr. Heinicke:

The Department of Toxic Substances Control (DTSC) has reviewed the Draft Initial Study/Mitigated Negative Declaration (IS/MND), dated August 2014, for the Elk Grove Unified School District, Anatolia II Elementary School Project. The due date to submit comments is September 24, 2014.

The Elk Grove Unified School District (District) proposes to construct a new elementary school approximately 70,000-square-feet in size to accommodate 900 students with provisions for future expansion to 1,100 students under a traditional schedule at the southwest corner of Appolon Drive and Sophistry Drive in the City of Rancho Cordova, Sacramento County (Site). The school may convert to a multi-track year-round schedule, which would allow the number of students enrolled at the school to increase to 1,400. However, the number of students attending classes on campus would not exceed 1,100 students during any session. The project would include administrative offices, classrooms, a library, and a cafeteria/multi-purpose room. In addition, the project would provide outdoor athletic/recreational facilities with features such as hard courts and turf play fields.

On June 17, 2014, the District entered into an Environmental Oversight Agreement (HSA-EOA 13/14-120) with DTSC for oversight of environmental investigation activities. The District has made a commitment to work with DTSC to complete the investigation of environmental impacts at the Site. As of the date of this letter, the environmental

DTSC-13/14-120-001



## 2. Response to Comments

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Mr. Bill Heinicke  
September 23, 2014  
Page 2

investigation of the Site is in the preparation of a Preliminary Environmental Assessment work plan phase.

Based on a review of the Draft IS/MND, DTSC would like to provide the following comments:

1. The environmental investigation, and mitigation and/or removal if deemed necessary, should continue to be conducted under DTSC oversight. The Draft IS/MND requires an analysis of the potential public health and environmental impacts associated with the proposed response action, pursuant to requirements of the California Environmental Quality Act (Pub. Resources Code, div. 13, §21000 et seq.), and it's implementing Guidelines (Cal. Code Regs., title 14, §15000 et seq.), prior to approval or adoption of the Draft IS/MND for the project. A discussion of the mitigation and/or removal actions, and associated cumulative impacts to the Site and the surrounding environment, should be included in the Draft IS/MND. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to the Site and the surrounding environment, are not available for inclusion in the Draft IS/MND, then an Addendum or Subsequent IS/MND may be required.
2. Section 5.8 (Hazards and Hazardous Materials) should include a more complete description of the environmental investigation activities conducted to date as well as the proposed mitigation actions, if deemed necessary. If a response action is required at the Site, Section 5.8 should include an estimate for both the volume of material to be removed as well the volume of the clean fill material to be imported to the Site as part of any proposed mitigation or removal actions (including the number of trucks to be used). DTSC recommends that all fill material imported to the Site be evaluated in concurrence with DTSC's 2001 Clean Fill Advisory. The hazardous waste disposal facility planned to be used for impacted soils that are proposed to be removed from the Site, if deemed necessary, should also be identified. If the disposal facility is not known, then the IS/MND should identify potential permitted facilities. For Section 5.16 (Transportation/Traffic), the route proposed to be taken for mitigation or removal action activities, if deemed necessary, should be at least tentatively identified on a map. Sections 5.3, 5.7, and 5.12 (Air Quality, Greenhouse Gas Emissions, and Noise, respectively) will also need to address the proposed mitigation and/or removal actions, if deemed necessary, and their associated impacts.

DTSC is also administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

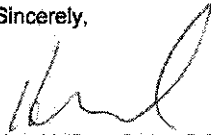
## 2. Response to Comments

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Mr. Bill Heinicke  
September 23, 2014  
Page 3

For additional information on DTSC's Schools process or CLEAN Program, please visit DTSC's web site at [www.dtsc.ca.gov](http://www.dtsc.ca.gov). If you would like to discuss this matter further, please contact me at (916) 255-3895, or via e-mail at [Bud.Duke@dtsc.ca.gov](mailto:Bud.Duke@dtsc.ca.gov).

Sincerely,



Harold (Bud) Duke, PG  
Senior Engineering Geologist  
Northern California Schools  
Brownfields and Environmental Restoration Program

cc: (via e-mail)

State Clearinghouse ([State.clearinghouse@opr.ca.gov](mailto:State.clearinghouse@opr.ca.gov))  
Office of Planning and Research

Michael O'Neill ([Moneill@cde.ca.gov](mailto:Moneill@cde.ca.gov))  
Department of Education – Sacramento, CA

Nancy Ritter ([Nancy.Ritter@dtsc.ca.gov](mailto:Nancy.Ritter@dtsc.ca.gov))  
DTSC CEQA Tracking Center – Sacramento, CA

Jose Luevano ([Jose.Luevano@dtsc.ca.gov](mailto:Jose.Luevano@dtsc.ca.gov))  
DTSC Northern California Schools

Jose Salcedo ([Jose.Salcedo@dtsc.ca.gov](mailto:Jose.Salcedo@dtsc.ca.gov))  
DTSC Northern California Schools

CEQA Reading File – Chatsworth Office

## 2. Response to Comments

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## 2. Response to Comments

**A4. Response to Comments from Harold (Bud) Duke, PG, Senior Engineering Geologist, Northern California Schools, Brownfields and Environmental Restoration Program, Department of Toxic Substances Control, dated September 23, 2014.**

A4-1 The District acknowledges DTSC's role in approving the project site and the District entered into an Environmental Oversight Agreement with DTSC on June 17, 2014. The District is required to and has made a commitment to work with DTSC to complete the investigation until no further action is required. As stated in the Initial Study, pursuant to Section 17213.1 of the California Education Code, the District is required to implement appropriate site cleanup measures if deemed necessary by DTSC. The District will also be required to comply with any applicable local, regional, and state regulations involving any removal or disposal of impacted soils.

Additionally, the construction air quality analysis in the Initial Study assumed a maximum of 4 acres per day of soil disturbance, not exceeding the maximum daily disturbed area threshold of 15 acres. Because additional soil removal, if deemed necessary, would not exceed this daily threshold, construction air quality impacts would not be substantially greater than already addressed in the Initial Study. Similarly, the Initial Study already identified excavation operation as the highest potential noise exposure source and discussed impacts. Although construction duration may increase slightly, compliance with the Rancho Cordova General Plan Noise Element that limits the hours of construction to daytime period would ensure that noise impacts are less than significant. The project-generated greenhouse gas emissions (GHG) would be 346 metric tons (MT) per year, not exceeding Sacramento Metropolitan Air Quality Management District's (SMAQMD) screening threshold of 900 MT. Where amortized construction GHG emissions were calculated at 39 MT per year, additional soil removal action for DTSC compliance would not result in significant GHG emissions impact.

It would be premature and highly speculative to assume a response action is required for this site and then estimate the quantity of hazardous materials and clean soil to be exported and imported, respectively. The District recognizes that if a response action is necessary, there may be additional work required to satisfy CEQA. Given the information presented above, the District expects any additional CEQA clearance would be negligible.

## 2. Response to Comments

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## 2. Response to Comments

LETTER A5 – Department of Transportation (2 page[s])

**A5**

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

EDMUND G. BRONKHORST, Governor

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3—SACRAMENTO AREA OFFICE

2379 GATEWAY OAKS DRIVE, SUITE 150

SACRAMENTO, CA 95833

PHONE (916) 274-0635

FAX (916) 263-1796

TTY 711



*Flex your power!  
Be energy efficient!*

September 18, 2014

032014-SAC-0177  
03-SAC-16/PM 11.47  
SCH# 2014082080

Mr. Bill Heinicke  
Director of Planning  
Elk Grove Unified Schools  
9510 Elk Grove Florin Rd  
Elk Grove, CA 95624-1801

**Anatolia II Elementary School-MND**

Dear Mr. Heinicke:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the project referenced above. The District proposes to construct a new elementary school of approximately 70,000 square feet to accommodate 900 students under a traditional schedule, with provisions for future expansion to 1,100 students. The school may convert to a multitrack, year-round schedule, which would allow the number of students enrolled at the school to increase to 1,400. However, the number of students attending classes on campus would not exceed 1,100 students during any session. The project would have administrative offices, classrooms, a library, and a cafeteria/multipurpose room. In addition, the project would provide outdoor athletic/recreational facilities with features such as hard courts and turf play fields. The project is located at Rancho Cordova at Appelon Drive and Sophistry Drive approximately 2.8 miles north of State Route 16. The following comments are based on the MND.

***Transportation Management Plan (TMP)***

If it is determined that traffic restrictions and detours are needed on or affecting State highways, a TMP or construction Traffic Impact Study may be required for approval by Caltrans prior to construction. TMPs must be prepared in accordance with Caltrans' *Manual on Uniform Traffic Control Devices*. Further information is available for download at the following web address:

<http://www.dot.ca.gov/hq/traffops/signtech/matedsupp/pdf/camuted2012/Part6.pdf>

*"Caltrans improves mobility across California"*


## 2. Response to Comments

Page 2/2

Mr. Bill Heinicke  
Elk Grove Unified Schools  
September 18, 2014  
Page 2

If you have any questions regarding these comments or require additional information, please contact Larry Brohman, Intergovernmental Review Coordinator for Sacramento County at (916) 274-0627 or by email at: [larry.brohman@dot.ca.gov](mailto:larry.brohman@dot.ca.gov)

Sincerely,

 *for Eric Fredricks*

ERIC FREDRICKS, Chief  
Office of Transportation Planning -South

c: Scot Morgan, State Clearing House

*"Caltrans improves mobility across California"*

## 2. Response to Comments

**A5. Response to Comments from Eric Fredricks, Chief, Office of Transportation Planning – South, Department of Transportation, District 3, dated September 18, 2014.**

A5-1 Comment noted. The proposed project is not anticipated to affect any state facilities. However, if it is determined that the proposed project affects state highways, the District would coordinate with Caltrans and consider preparing a Transportation Management Plan (TMP) or construction traffic impact study, as required, in accordance with Caltrans' *Manual on Uniform Traffic Control Devices*.





### 3. Mitigation Monitoring and Reporting Program

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**CEQA Action:** Mitigated Negative Declaration and Initial Study

**Project Location:** Southwest corner of Appolon Drive and Sophistry Drive in the SunRidge Specific Plan, City of Rancho Cordova, Sacramento County, California

**Lead Agency:** Elk Grove Unified School District.

### 3. Mitigation Monitoring and Reporting Program

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### 3. Mitigation Monitoring and Reporting Program

#### ANATOLIA II ELEMENTARY SCHOOL MITIGATION MONITORING AND REPORTING PROGRAM

<b>Mitigation Measure</b>	<b>Responsibility for Implementation</b>	<b>Timing</b>	<b>Responsibility for Monitoring</b>	<b>Monitor (Signature Required) (Date of Compliance)</b>
<b>5.2 AIR QUALITY</b>				
AQ-1 The construction contractor shall only use Tier-3 off-road vehicles (50 hp or more) to minimize construction NO <sub>x</sub> emissions from off-road equipment exhaust. This shall be specified in the construction bid and monitored by Elk Grove Unified School District during the entire construction duration.	<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• Construction contractor</li> </ul>	Prior to construction contract award	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>	
<b>5.4 BIOLOGICAL RESOURCES</b>				
BIO-1 EGUSD shall implement one of the following two measures to address impacts to nesting birds that are protected under the Migratory Bird Treaty Act or California Fish and Game Code, Section 3503, but are not protected under other regulations (e.g., state or federal Endangered Species Act). i) The EGUSD shall have a preconstruction survey conducted by a qualified biologist on the project site. The preconstruction survey shall be consistent with the requirements of mitigation measure BR-8 in the Sunrise Douglas Community Plan/SunRidge Specific Plan EIR. In addition, the species and location of nesting birds (if any) will be identified and mapped on	<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• Qualified biologist</li> <li>• Construction contractor</li> </ul>	Prior to construction	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>	

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<p>an appropriate scale base map of the project site. Avoidance zones of (1) 60 feet from each nest (for species other than raptors) or (2) 300 feet from each nest (for raptors) shall be observed during the nesting season (i.e., nest building to fledging of young). The nesting season shall be determined through monitoring of the nests by a qualified biologist (to determine when nests have been abandoned and are no longer in use). Only after the nesting season ends (i.e., nests have been determined to be abandoned) shall clearing or development proceed.</p> <p>ii) Clearing of the project site may be allowed during a limited operating period between September and January (i.e., no clearing or development shall begin earlier than September 1 or later than January 31). It should be noted that use of a limited operating period does not require site clearance for nesting birds by a qualified biologist. Furthermore, construction activities may proceed past January 31 as long as the site has been cleared of potential nesting habitat prior to this date.</p>				
<p>BIO-2 The EGUSD shall implement the following measures to address impacts to burrowing owls.</p> <p>i) The applicant shall have a</p>	<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• Qualified biologist</li> <li>• Construction contractor</li> </ul>	<p>Prior to construction</p>	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>	

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<p>preconstruction survey for burrowing owls within the project site conducted by a qualified biologist. The survey shall be conducted consistent with the guidelines provided by the Staff Report on Burrowing Owl Mitigation (CDFW 2012) or most recent published guidance from the California Department of Fish and Wildlife (CDFW).</p> <p>ii) If burrowing owls are found on the project site, no clearing or development shall be allowed within 250 feet of any burrow determined to be occupied by owls during the breeding season (i.e., February 1 to August 31) or within 160 feet of any burrow determined to be occupied by owls during the nonbreeding season (i.e., September 1 to January 31).</p> <p>iii) If occupied burrows must be destroyed, no destruction of burrows shall occur during the breeding season. Burrows may be destroyed during the nonbreeding season, but only if all burrowing owls have been passively relocated more than 160 feet outside of the project site consistent with the guidance in the Staff Report on Burrowing Owl Mitigation (CDFW 2012).</p> <p>iv) To offset the loss of foraging and burrow habitat, the applicant shall enter into a Memorandum</p>				
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<p>of Understanding (MOU) with the CDFW that provides long-term protection of foraging habitat at an offsite location adjacent to occupied burrowing owl habitat. The offsite location should be acceptable to the CDFW and at a minimum convey 6.5 acres of suitable foraging habitat for each unpaired individual or pair of burrowing owls affected. Conveyance of the offsite habitat shall be through purchase of a conservation easement or fee title.</p>			
<p><b>5.5 CULTURAL RESOURCES</b></p> <p><b>CULT-1</b> If prehistoric or historical archaeological deposits are discovered during project activities, all work within 25 feet of the discovery shall be redirected, the District Planning Division shall be contacted directly, and a qualified archaeologist shall be contacted to assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Preservation in place shall be implemented if feasible. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by the project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction to avoid archaeological</p>	<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• Qualified archaeologist</li> <li>• Construction contractor</li> </ul>	<ul style="list-style-type: none"> <li>• During grading</li> </ul>	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>

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<p>sites, incorporating sites into open spaces, covering sites with stable soils, and deeding the site into a permanent conservation easement. Project personnel should not collect or move any archaeological materials or human remains and associated materials. Archaeological resources can include flaked-stone tools (e.g., projectile points, knives, choppers) or obsidian, chert, basalt, or quartzite toolmaking debris; bone tools; culturally darkened soil (i.e., midden soil often containing heat-affected rock, ash and charcoal, shellfish remains, faunal bones, and cultural materials); and stone-milling equipment (e.g. mortars, pestles, handstones). Prehistoric archaeological sites often contain human remains. Historical materials can include wood, stone, concrete, or adobe footings, walls, and other structural remains; debris-filled wells or privies; and deposits of wood, glass, ceramics, metal, and other refuse.</p>			<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• Qualified paleontologist</li> <li>• Construction contractor</li> </ul>	<p><b>CULT-2</b> If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet must stop, and the District Planning Division shall be notified. A qualified archeologist shall inspect the findings within 24 hours of discovery. Cultural resources shall be recorded on California Department of Parks and Recreation Form 523 (Historic Resource Recordation form). If it is determined that the proposed development could</p>
	<ul style="list-style-type: none"> <li>• During grading</li> </ul>	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>		



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<p>damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. Preservation in place shall be implemented if feasible. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by a project. Possible mitigation under CEQA emphasizes preservation in place measures, including planning construction to avoid archaeological sites, incorporating sites into parks and other open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement. Under CEQA Guidelines, when preservation in place is not feasible, data recovery through excavation shall be conducted with a data recovery plan in place. Therefore, when considering these possible mitigations, the District Planning Division shall have a preference for preservation in place.</p>				
5.16 TRANSPORTATION AND CIRCULATION				
T-1	<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• City of Rancho Cordova</li> </ul>	Prior to school opening	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>	

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<p>of queuing at the school access. The District shall monitor conditions at the Appolon Drive/Sophistry Drive intersection and provide manual traffic control personnel as needed. The District shall widen the driveway on Sophistry Drive to permit two exiting travel streams and shall work with the City of Rancho Cordova to install an all-way stop.</p>				
T-2	<p>Prior to the opening of Anatolia II Elementary School, the District shall work with the City of Rancho Cordova to identify an appropriate package of school zone signing and parking controls to minimize pedestrian activity at uncontrolled locations and create an applicable "Safe Route to School" plan. In addition, the District shall continue to educate parents and students about the safety concerns related to on-street drop-off and pick-up.</p>	<ul style="list-style-type: none"> <li>• EGUSD</li> <li>• City of Rancho Cordova</li> </ul>	Prior to school opening	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>
T-3	<p>The District and City of Rancho Cordova shall work to prepare and implement a Parking Management Plan for large events that directs traffic to hardcourt parking and identifies problem locations where on-street parking may need to be prohibited during these events.</p>	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>	Prior to first large event	<ul style="list-style-type: none"> <li>• EGUSD</li> </ul>

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