County of Lassen
Department of Planning and Building Services

• Planning • Building Permits • Code Enforcement • Surveyor • Surface Mining

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May 10, 2019

NOTICE OF INTENT
TO ADOPT A NEGATIVE DECLARATION

Applicant:	Long Valley Charter School
File No.:	Initial Study #2018-009 for Use Permit #2018-007
Project:	Proposal to construct a charter school, which comprises an approximately 17,757-square-foot main building (for classrooms, offices, a multipurpose room, and a library/resource area), an 8,000-square-foot gym, two 900-square-foot portable buildings (for additional offices and independent learning), a 54,000-square-foot sports field, two basketball courts, a kindergarten play area, the related parking lot, and a 5-foot-wide Class II bicycle lane along with bicycle parking facilities. The existing charter school location (approximately 1.75 miles north of the proposed charter school location) will remain under the control of the local school district (Fort Sage Unified).
Location:	The project site is located approximately one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Road and U.S. Highway 395 at 435-500 Doyle Loop Road. All development is currently proposed at APN 141-050-95.
Zoning:	The subject parcels are zoned A-1 (General Agricultural District) and A-1-H (General Agricultural District, Highway Combining District) and have an "Intensive Agriculture" land use designation in the *Lassen County General Plan, 2000*, the latter according to Planning Commission Resolution Number 02-04-01.
A.P.N.:	141-050-95, 141-050-94
Staff Contact:	Stefano Richichi, Associate Planner

Pursuant to the California Environmental Quality Act, Lassen County is the Lead Agency for the project identified above and is preparing a Negative Declaration stating that there is no substantial evidence in the record, as currently filed, which indicates that the proposed project may have a significant effect on the environment.

The public review period for this project has been established from May 14, 2019, to June 13, 2019. Any comments you may have regarding this proposed Negative Declaration must be submitted to the Lassen County Department of Planning and Building Services prior to the end of the review period. The proposed Negative Declaration and Initial Study for this project are available for inspection at the Department of Planning and Building Services at the address given above.

For the County of Lassen,

Maurice L. Anderson,
Environmental Review Officer

MLA:smr

Distribution: Supervisor Hammond (5); Long Valley Charter School (Property Owner); Sherri Morgan (Applicant); Nick Trover (Agent); Co. Assessor's Office; Co. Building Official; Co. Fire Warden/CAL FIRE; Co. Environmental Health Dept.; Co. Public Works; Co. Public Works/Road Div.; Co. Public Works/Transportation; Sheriff; Lahontan RWQCB (email); Dept. of Water Resources (DWR); Dept. of Fish & Wildlife: (Redding/Wendel); Caltrans, District 2; State Clearinghouse (15 Copies); Pit River Tribe of California; Greenville Rancheria of Maidu Indians; Susanville Indian Rancheria; Honey Lake Maidu; Washoe Tribe of Nevada and California; Doyle Fire Protection District; Co. Air Pollution Control Officer; Fort Sage Unified School District; Lassen Community College District; Long Valley School District; Plumas-Sierra REC; Union Pacific Railroad; Division of State Architect; California Department of Education-School Facilities and Transportation Services Division; Department of California Highway Patrol-Susanville Area Office; property owners within 750 feet of proposed and existing school sites.

IS2018-009\NoticeIntentAdoptNegDec

PROPOSED NEGATIVE DECLARATION #2018-009

LEAD AGENCY: Lassen County

PROJECT NAME: Use Permit #2018-007

APPLICANT: Long Valley Charter School

PROJECT DESCRIPTION:

Proposal to construct a charter school, which comprises an approximately 17,757-square-foot main building (for classrooms, offices, a multipurpose room, and a library/resource area), an 8,000-square-foot gym, two 900-square-foot portable buildings (for additional offices and independent learning), a 54,000-square-foot sports field, two basketball courts, a kindergarten play area, the related parking lot, and a 5-foot-wide Class II bicycle lane along with bicycle parking facilities. The existing charter school location (approximately 1.75 miles north of the proposed charter school location) will remain under the control of the local school district (Fort Sage Unified). The subject parcels are zoned A-1 (General Agricultural District) and A-1-H (General Agricultural District, Highway Combining District) and have an "Intensive Agriculture" land use designation in the *Lassen County General Plan, 2000*, the latter according to Planning Commission Resolution Number 02-04-01.

PUBLIC REVIEW PERIOD:

May 14, 2019 through June 13, 2019

PROJECT LOCATION:

The project site is located approximately one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Road and U.S. Highway 395 at 435-500 Doyle Loop Road. All development is currently proposed at APN 141-050-95.

APNs:

141-050-95, 141-050-94

FINDINGS:

1. On the basis of the attached initial study, the project will not have a significant effect on the environment.

Signature: _____ Date: 5-10-19

Maurice L. Anderson,
Environmental Review Officer

INITIAL STUDY #2018-009 FOR USE PERMIT #2018-007,
LONG VALLEY CHARTER SCHOOL

DETERMINATION:

On the basis of this Initial Study:

☒ 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 to the project and mitigation measures have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT will be required.

Maurice L. Anderson,
Environmental Review Officer

5-10-19
Date

Project Title:	Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School
Lead Agency Name and Address:	Lassen County Department of Planning and Building Services 707 Nevada Street, Suite 5 Susanville, CA 96130
Project Location:	The project site is located approximately one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Road and U.S. Highway 395 at 435-500 Doyle Loop Road. All development is currently proposed at APN 141-050-95. APNs: 141-050-95, 141-050-94
Proponent's Name and Address:	Long Valley Charter School
General Plan:	"Intensive Agriculture," *Lassen County General Plan, 2000.*
Zoning:	A-1 (General Agricultural District), A-1-H (General Agricultural District, Highway Combining District)
Authority:	Use Permit, Lassen County Code Section 18.112 et seq.

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FIGURES and TABLES

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Figure 1. Vicinity Map

Project Description: Proposal to construct a charter school, which comprises an approximately 17,757-square-foot main building (for classrooms, offices, a multipurpose room, and a library/resource area), an 8,000-square-foot gym, two 900-square-foot portable buildings (for additional offices and independent learning), a 54,000-square-foot sports field, two basketball courts, a kindergarten play area, the related parking lot, and a 5-foot-wide Class II bicycle lane along with bicycle parking facilities. The existing charter school location (approximately 1.75 miles north of the proposed charter school location) will remain under the control of the local school district (Fort Sage Unified). The subject parcels are zoned A-1 (General Agricultural District) and A-1-H (General Agricultural District, Highway Combining District) and have an "Intensive Agriculture," land use designation in the *Lassen County General Plan, 2000*, the latter according to Planning Commission Resolution Number 02-04-01.

Project Location: The project site is located approximately one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Road and U.S. Highway 395 at 435-500 Doyle Loop Road. All development is currently proposed at APN 141-050-95. The subject parcels are located in the Doyle 7.5-minute Quadrangle as identified by the United States Geological Survey.

Environmental Setting: The subject parcels are unimproved.

ACCESS: Access to the project site is from U.S. Highway 395 and Doyle Loop Road (County Road 361). In its email dated August 31, 2018, the Lassen County Department of Public Works indicated that the proposed project will require an encroachment permit from its Roads Division. As stated both in Sections 6 and 14, titled "Transportation/Traffic" and "Energy," respectively, the applicant has agreed to construct a 5-foot-wide bicycle lane in order to comply with policies found in the *Lassen County General Plan, 2000* (including its circulation and energy elements) and the *Lassen County Bikeway Master Plan, 2011*. See said sections for more information.

VEGETATION: The applicant hired Donald Burk, Environmental Services Manager of ENPLAN Environmental and Geospatial Technologies in Redding, CA to prepare a biological study for this project. Mr. Burk prepared his *Biological Study Report, Long Valley Charter School Doyle Project* in August 2018, which is included with this initial study as "Attachment 9." According to said biological study, three plant communities were identified in the study area during the field evaluation: ruderal grassland, big sagebrush scrub, and riparian scrub/wet meadow wetland.

Ruderal grassland is "by far the most abundant habitat present in the study area" and consists of weedy plants that succeed in disturbed soils (Page 6, Burk). Dominant plant species are tumble-mustard and downy brome, but other common species at the project site include flixweed, broadleaved peppergrass, hairy whitetop, tall fescue, and other introduced herbaceous species.

Approximately 0.35 acres of big sagebrush scrub habitat is present in the southwestern portion of the project site. Shrubs identified in the biological study include big sagebrush, white-stemmed rabbitbrush, and desert peach. Other species present at the site include jagged chickweed, red-stemmed filaree, and various grasses.

Lastly, dominant shrubs in the riparian scrub/wet meadow wetland include California rose and sandbar willow, which according to the above biological study, form "a nearly impenetrable stand in the wettest portions of the community" (Page 6, Burk). The outer margins of the wetland "support herbaceous species such as common monkey flower, many-flowered monkeyflower, broadleaved peppergrass, biennial cinquefoil, and western marsh cudweed" (Page 6, Burk).

According to the California Department of Fish and Wildlife's California Natural Diversity Database, special plant species in the Doyle Quadrant include Schoolcraft's wild buckwheat, classified as 1B.2 (plants rare, threatened, or endangered in California and elsewhere; fairly threatened in California) and Macdougal's lomatium, many-flowered thelypodium, sagebrush loeflingia, Geyer's milk-vetch, classified as 2B.2 (plants rare, threatened, or endangered in California, but more common elsewhere; fairly threatened in California). The biological study identifies several other special-status species that occur within a five-mile radius of the project site, including Bailey's ivesia, lance-leaved surf-pea, Nevada daisy, Plummer's clover, Pulsifer's milk-vetch, sticky pyrrocoma, Suksdorf's broom-rape, and western seablite (Pages 8-9, Burk).

Mr. Burk also identified at least seven noxious weeds at the project site, including Scotch thistle, crossflower, hairy whitetop, broadleaved peppergrass, bull thistle, Russian thistle, and bindweed (Page 11, Burk).

Please see Section 7, titled "Biological Resources," as well as the attached biological study (Attachment 9), for more information.

WILDLIFE: According to the above biological study, wildlife species observed during Mr. Burk's field survey included "western meadowlark, white-faced ibis, turkey vulture, western yellow-bellied racer, and Great basin spadefoot (tadpoles); evidence of fossorial rodents was also observed" (Page 9). Mr. Burk observed several "small flocks of white-faced ibis flying to the north and south, east of the project site"; although "white-faced ibis is on the [California Department of Fish and Wildlife] Watch List, [it] is not a Species of Special Concern" (Page 9, Burk).

No rare, threatened, or endangered species pursuant to the Endangered Species Act are known to populate the subject parcel; however, according to the California Department of Fish and Wildlife's California Natural Diversity Database, animals in the Doyle Quadrant that are under special federal or state status include the Swainson's hawk (threatened) and the gray wolf (endangered). According to Mr. Burk, the U.S. Fish and Wildlife Service identified one federally listed species as potentially occurring in the project area, North American wolverine (Page 9, Burk).

In addition to the federally- or state-designated special status species above, special status species recognized by the California Department of Fish and Wildlife (CDFW) that may occur in the Doyle Quadrant include the golden eagle (fully protected, CDFW watch list) and the prairie falcon (CDFW watch list). Mr. Burk also states that one special status species, Swainson's hawk, has been reported within a five-mile radius of the project site, in addition to two non-special status species, Prairie falcon and Morrison bumble bee (Page 9, Burk).

Please see Section 7, titled "Biological Resources," as well as the attached biological study (Attachment 9), for more information.

HYDROLOGY: Long Valley Creek traverses the northeastern corner of APN 141-050-94, while Willow Ranch Creek tracks APN 141-050-94's northwestern boundary. According to the United States Fish and Wildlife Service's National Wetlands Inventory Mapper, Long Valley Creek is a freshwater shrub wetland that is seasonally flooded, meaning that surface water is present especially early in the growing season, but is absent by the end of the growing season in most years. The National Wetlands Inventory classifies Willow Ranch Creek as a seasonally-flooded riverine streambed, which includes wetlands and deepwater habitats contained within a channel. The project site is not within either creek. Furthermore, the portion of Long Valley Creek that traverses APN 141-050-94 is in a 13.13-acre habitat conservation easement (see Book 35, Page 30 of the Official Records of Lassen County, California).

The Federal Emergency Management Agency identifies the subject parcels as mostly in a Zone "X" floodplain zone, defined as an "area of minimal flood hazard" (Zone "X," Panel #06035C2640D, 9/3/2010), although the portion of APN 141-050-94 near Long Valley Creek is in a Zone "A" floodplain zone, defined as "areas subject to inundation by the 1-percent-annual-chance flood event."

Please see Section 4, titled "Hydrology," as well as Section 7, titled "Biological Resources," for more information.

SOILS: According to the Natural Resources Conservation Service's (NRCS) Web Soil Survey, soils at the subject parcels comprise Calpine sandy loam (0 to 2 percent slopes, land capability classification of 2e [irrigated] and 4e [nonirrigated]), Blickenstaff sandy loam (0 to 2 percent slopes, land capability classification of 2e [irrigated] and 6e [nonirrigated]), Fluvents-Riverwash complex (0 to 1 percent slopes, land capability classification of 8 [nonirrigated], no land capability classification for irrigated land), and Bobert sandy loam (0 to 2 percent slopes, land capability classification of 4s [irrigated] and 7s [nonirrigated]).

GEOLOGY: According to the California Department of Conservation California Geological Survey's *Earthquake Fault Zone, Special Studies Zone Maps* for the Doyle Quadrangle, effective November 1991, the Doyle Quadrangle has several "active faults" (considered to have been active during Holocene time and to have a relatively high potential for surface rupture). The northeastern portion of APN 141-050-94, along Long Valley Creek, is in a special studies zone (active fault) boundary; however, said boundary is in excess of 1,000 from all proposed improvements.

Surrounding Land Use: The project site is located approximately one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Road and U.S. Highway 395. The subject parcels comprise Parcels 'A' and 'B' as shown on the Amended Parcel Map No. 2000-53, filed by Floyd Oakley, recorded on March 6, 2002, at Book 37, Pages 51 and 52 of the Official Records of Lassen County, California. Immediately surrounding parcels consist of Doyle Christian Church and mostly residential parcels in the Town of Doyle to the south, and the Willow Springs Subdivision No. 2 to the north. The Willow Springs Subdivision No. 1 is west (across U.S. Highway 395) of the project site and unimproved land (across Union Pacific Railroad) is to the east. Said parcels are zoned as illustrated in Table 1 below:

	Zoning (see notes at bottom)	**Parcel Size** (acres)	**Land Use Designation** (*Lassen County General Plan, 2000)*
North	A-1*	53.57, 64.01	"Extensive Agriculture, Intensive Agriculture"
Northwest	A-1, A-1-H**	0.84-2.26	"Extensive Agriculture"

East	A-1	53.12	"Intensive Agriculture"
South	A-1	0.13-0.8	"Town Center"
West	A-1-H	1.77-2.52	"Extensive Agriculture"

* The A-1 zoning district is the "General Agricultural District" as defined in Chapter 18.16 of the Lassen County Code
** The A-1-H zoning district is the "General Agricultural District/Highway Combining District" as defined in Chapters 18.16 and 18.92 of the Lassen County Code

Regulatory Setting: The purpose of this section is to establish that the Long Valley Charter School is required to secure the use permit described in this initial study, as well as any building permit(s) through the Lassen County Department of Planning and Building Services. In addition, this section establishes that the proposed project is not subject to Section 21151.8 of the Public Resources Code, Section 15186 of the California Environmental Quality Act (CEQA) Guidelines, or Title 5 of the California Code of Regulations.

Government Code Section 53091(a) states, "Each local agency shall comply with all applicable building ordinances and zoning ordinances of the county or city in which the territory of the local agency is situated. Government Code Section 53090 defines a "local agency" as "an agency of the state for the local performance of governmental or proprietary function within limited boundaries. *City of Santa Clara v. Santa Clara Unified School District* (1971) 22 Cal.App.3d 152 recognized school districts as "local agencies."

Government Code Section 53094(a) states, "Notwithstanding any other provision of this article, this article does not require a school district to comply with the zoning ordinances of a county or city unless the zoning ordinance makes provision for the location of public schools and unless the city or county has adopted a general plan." Lassen County has both a zoning ordinance that addresses the location of public schools and has adopted a general plan. In light of the section immediately above, then, school districts must comply with Lassen County's zoning ordinance.

However, Government Code Section 53094(b) states, "Notwithstanding subdivision (a), the governing board of a school district, that has complied with the requirements of Section 65352.2 of this code and Section 21151.2 of the Public Resources Code, by a vote of two-thirds of its members, may render a city or county zoning ordinance inapplicable to a proposed use of property by the school district. The governing board of the school district may not take this action when the proposed use of the property by the school district is for nonclassroom facilities, including, but not limited to, warehouses, administrative buildings, and automotive storage and repair buildings." Therefore, so long as the governing board of a school district has complied with the above sections, it may (by a two-thirds vote) override Lassen County's zoning ordinance (Government Code Section 53094(b) is referred to below as the "override provision").

Government Code Section 53097.3 states, "Notwithstanding any other provision in this article, no school district may render a city or county ordinance inapplicable to a charter school facility pursuant to this article, unless the facility is physically located within the geographical jurisdiction of that school district." Implicit to the above section is that only a school district, and not a charter school itself, may use the override provision. *San Jose Unified School District et al. v. Santa Clara County Office of Education, et al.* (2016) 7 Cal.App.5th 967 reaffirms the interpretation that only school districts may use the override provision. Therefore, despite the override provision found at Government Code Section 53094(b), only the governing board of a school district (and not a charter school) may exempt itself from the zoning provisions.

The applicant has not provided any indication that the governing board of the pertinent school district (Termo-Ravendale School District) has exempted the proposed charter school from Lassen County's zoning ordinance. Furthermore, Termo-Ravendale School District likely could not exempt Long Valley Charter School from Lassen County's zoning ordinance, because the location of the proposed school seems to be outside of Termo-Ravendale School District's "geographical jurisdiction" as referenced in Government Code Section 53097.3 (indeed, Fort Sage Unified School District has "geographical jurisdiction" over Long Valley Charter School's proposed location). For these reasons, the proposed use permit application is subject to Lassen County's zoning ordinance, and by extension is subject to California Environmental Quality Act (CEQA) review with Lassen County as the "lead agency" as defined by Public Resources Code Section 21067. For this reason, the Lassen County Department of Planning and Building Services, as staff to the Environmental Review Officer pursuant to Resolution No. 01-043, has prepared the following initial study.

Furthermore, Education Code Section 47610 states, "A charter school shall comply with this part and all of the provisions set forth in its charter, but is otherwise exempt from the laws governing school districts, except for… [t]he California Building Standards Code… as adopted and enforced by the local building enforcement agency with jurisdiction over the area in which the charter school is located." Therefore, charter schools must comply with the California Building Standards Code as enforced by Lassen County. Although there are exceptions to the above requirement found at Education Code Section 47610.5, neither exception applies.[1]

[1] Said section states that a charter school facility is exempt from Education Code Section 47610(d) if either of the following conditions apply:

1. The charter school complies with Article 3 (commencing with Section 17280) and Article 6 (commencing with Section 17365) of Chapter 3 of Part 10.5.

2. The charter school facility is exclusively owned or controlled by an entity that is not subject to the California Building Standards Code, including, but not limited to, the federal government.

The applicant has not submitted any information that would indicate that the charter school complies with Articles 3 and 6 of Chapter 3 of Part 10.5 of the Education Code nor is owned by or controlled by an entity that is not subject to the California Building Standards Code, including but not limited to, the federal government.

This interpretation is also consistent with the California Department of General Services' Division of the State Architect's (DSA) Policy PL 17-01: Charter Schools Enforcement Jurisdiction, which states that if the project will not be funded by the Charter School Facilities Program, the project must be submitted to either DSA for plan review and construction oversight or the local building enforcement agency with jurisdiction over the area in which the charter school is located. For the above reasons, the applicant must also secure all necessary building permits for the charter school through the Lassen County Department of Planning and Building Services.

Section 21151.8 of the Public Resources Code, Section 15186 of the CEQA Guidelines, and Title 5 of the California Code of Regulations together relate environmental and construction standards for school projects in California. However, Section 21151.8 of the Public Resources Code and Section 15186 of the CEQA Guidelines pertain to the preparation of environmental documents under CEQA for school projects that are being constructed by school districts (or in the latter case, projects within one-quarter mile of an existing school). The proposed project is being built by the charter school, not the Termo-Ravendale School District,[2] and is not within a quarter-mile of an existing school.

In addition, Assistant Director Fred Yeager of the California Department of Education's School Facilities and Transportation Services Division, in his email to Associate Planner Stefano Richichi dated February 28, 2019, confirmed that the proposed project "is not required to follow California Code of Regulations Title 5… regarding school site and design standards."

[2] According to the email from Project Agent Nick Trover, dated February 7, 2019.

1. LAND USE AND PLANNING. Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

DISCUSSION:

(a) The proposed project would not block any existing access or otherwise divide any established community. The proposed charter school is approximately one quarter-mile north of the Town of Doyle.

(b) The project site is zoned A-1 (General Agricultural District) and A-1-H (General Agricultural District, Highway Combining District) and is designated "Intensive Agriculture" in the *Lassen County General Plan, 2000*, according to Planning Commission Resolution Number 02-04-01. According to Lassen County Code Section 18.16.050(10), the A-1 district allows for "[u]ses allowed by use permit in the…R-1 [zoning district]…" by use permit. According to Lassen County Code Section 18.22.040(2), the R-1 district allows for "[p]ublic and quasi-public uses including…schools" by use permit. Therefore, schools, such as the current application for a charter school, are allowed by use permit in the A-1 district.

The following goals, objectives, implementation measures and descriptions from the *Lassen County General Plan, 2000*, pertain to the proposal:

Designation of Land Uses

- *GOAL L-1: To maintain a system of land use designations which sets forth the County's policies pertaining to the general distribution and intensity of land uses, and which strives to ensure compatibility between land use types by providing for efficient and complimentary* [sic] *patterns and mixtures of land uses.*

- *Implementation Measure LU-A: The County shall utilize the zoning provisions of the Lassen County Code to adopt and enforce corresponding zoning districts, and*

to consider the approval of related use permits and land divisions, which implement and are compatible with the policies, general land uses and programs specified in this Land Use Element and in area plans adopted as part of the General Plan.

- *Implementation Measure LU-B: The County recognizes the need and legal requirements for making land use decisions which are consistent with the General Plan.*

- *Implementation Measure LU-C: For each town center which is not included in an area plan, the County should, in cooperation with community service districts and other local service providers, develop "Town Center Plans" to clarify the boundaries of each town center, address related community development and service needs, and resolve particular land use and zoning issues.*

1. ISSUE: Land Use Compatibility

- *GOAL L-4: Compatibility between land use types by providing for complementary mixtures and patterns of land uses.*

- *LU-6 POLICY: The County recognizes general plan land use designations and consistent zoning as the appropriate and primary tools for attempting to achieve and maintain compatibility of land uses within the context of the County's land use authority and local control.*

- *Implementation Measure LU-F: The County shall continue to utilize the California Environmental Quality Act (CEQA) process, when applicable, to evaluate the potential impacts of proposed changes in land uses on surrounding lands and to implement appropriate mitigation measures when needed.*

2. ISSUE: Growth and Development

- *GOAL L-5: Orderly, contiguous growth and appropriate land-conserving densities as an alternative to sprawl and "leap-frog" development.*

- *Implementation Measure LU-G: The County shall phase out the use of the A-1, General Agriculture District, and shall, following appropriate public hearings, rezone all areas currently zoned A-1 to more specific zoning districts which are consistent with General Plan land use designations.*

4. ISSUE: Neighborhood Quality

- *GOAL L-8: Neighborhoods which offer safe and pleasant living environments for the residents of Lassen County.*

- *LU21 POLICY: The County supports the need to maintain safe and pleasant living environments and, in consideration of related land use decisions, shall require mitigation of impacts which significantly threaten such qualities.*
- *GOAL L-9: Protection of the open, rural character of the County.*

- *LU22 POLICY: The County shall encourage expansion of existing residential areas and discourage sprawl and scattered development.*

- *GOAL L-10: Reasonable development and design review standards which protect communities from poorly designed development which detracts from the overall quality of the area.*

5. ISSUE: Transportation

- *GOAL L-11: Transportation systems which compliment* [sic] *and support the County's land use patterns.*

- *LU25 POLICY: The County shall continue to review and, when warranted, formulate improved standards for the necessary improvement and maintenance of roads serving new development, including standards for the incremental improvement or development of public roads.*

- *Implementation Measure LU-R: Pursuant to impacts evaluated in an environmental impact report or other form of project review, the County may require mitigation measures which will insure that project developers adequately and fairly compensate or participate with the County in the necessary upgrading and/or repair of roads which will be significantly damaged by a project.*

6. ISSUE: Commercial Land Uses

- *LU29 POLICY: The County supports the economic viability of existing communities and will minimize the development of scattered commercial uses by directing commercial uses to existing town centers and commercial areas or the orderly expansion of such areas, with limited exceptions including home occupations, agricultural-related sales, and specially-considered local convenience and highway commercial sites.*

8. ISSUE: Public Services

- *GOAL L-14: A rate and the location of community growth which does not result in a significant burden to existing levels of public services and facilities, including schools, fire protection, and community sewer and water facilities.*

- *LU36 POLICY: Public facilities and services should be based upon a projection of reasonably expected population increase and economic growth, and should recognize the limits of the County's human, financial, and natural resources.*

- *LU38 POLICY: The County supports the provision of community facilities and services to provide for the orderly development of existing communities.*

- *GOAL L-15: School facilities which support high-quality education.*

- *LU39 POLICY: The County supports the provision of adequate school facilities, the selection of sites for school facilities which will be compatible with existing and future land uses in the vicinity, and the use by school districts of capital improvement plans to anticipate and prepare for future growth.*

- *Implementation Measure LU-V: The County will encourage and facilitate the preparation and use of capital improvement plans by school districts and service districts to anticipate future facility needs. The County will continue to encourage districts and non-profit organizations to apply for state and Federal grants to help expand and improve community infrastructure, including water and sewer systems, and to improve structural fire protection and other public services.*

- *Implementation Measure LU-W: The County may enter into memorandums of understanding to assist school districts and fire protection districts in the implementation of their capital improvement plans and programs.*

9. ISSUE: Agricultural Land Uses

- *GOAL L-16: Conservation of productive agricultural lands and lands having substantial physical potential for productive agricultural use, and the protection of such lands from unwarranted intrusion of incompatible land uses and conversion to uses which may significantly obstruct or constrain agricultural use and value.*

- *LU40 POLICY: The County recognizes and has generally assigned General Plan land use designations for lands having high agricultural resource value as "Intensive Agriculture" or "Crop Land and Prime Grazing Land." It also recognizes the potentially important agricultural values of some of the areas designated "Extensive Agriculture" or "Grazing and Sagebrush Environment" for rangeland grazing and other agricultural purposes.*

- *Implementation Measure LU-X: Land designated "Intensive Agriculture" in the Land Use Element shall be zoned "E-A" Exclusive Agriculture District, "A-3" Agricultural District, "U-C" Upland Conservation District, or "U-C-2" Upland Conservation/Resource Management District.*

- *Implementation Measure LU-Y: Land designated Extensive Agriculture" in the Land Use Element shall be zoned "U-C", Upland Conservation District, "U-C-2", Upland Conservation/Resource Management District" or "A-3", Agricultural District.*

10. ISSUE: Open Space Lands

- *GOAL L-17: The protection and appropriate management of open space lands and related natural resources.*

15. ISSUE: Wildlife Habitat

- *GOAL L-22: Protection and enhancement of important wildlife habitats to support healthy, abundant and diverse wildlife populations.*

- *LU49/WE-1 POLICY: The County supports the management of wildlife resources in ways that enhance the health and abundance of wildlife populations and the diversity of species and their habitats and which, at the same time, balance management policies and program objectives with the range of social and economic needs for which the County is also responsible.*

NATURAL RESOURCE LAND USES

Intensive Agriculture

The Intensive Agriculture designation identifies lands devoted to or having high suitability potential for the growing of crops and/or the raising of livestock on natural or improved pasture land. It requires the provision of parcel sizes large enough to support agricultural land use and production. Intensive Agriculture areas also provide a variety of open space resources including wildlife habitat and scenic resources.

This designation incorporates and generally replaces the land use term "Crop Land and Prime Grazing Land" used in the 1968 General Plan and in some area plans adopted since then. On the Land Use Map contained in this Land Use Element, areas indicated as "Intensive Agriculture" are intended to conform with areas designated in 1968 as Crop Land and Prime Grazing Land. Within certain area plans, more specific identification and designation of Intensive Agriculture areas may be made.

To the extent that residential uses are allowed, building intensity will generally not exceed .025 DUA. Population density will generally average .067 PPA. Exceptions to these averages would include limited farm labor housing facilities.

Corresponding Zoning: "E-A", Exclusive Agriculture District; "A-3", Agricultural District; "U-C", Upland Conservation District; "U-C-2"; Upland Conservation/Resource Management District.

INSTITUTIONAL LAND USES

Schools

Specifically designates educational facilities when not otherwise encompassed by a Town Center designation.

Corresponding Zoning: "I-1", Institutional District

NATURAL RESOURCE LAND USES

Scenic Corridor

Scenic Corridors identify areas bordering major highways which have significant or sensitive scenic values due to the existence of significant scenic features and the level of public exposure to those areas. This designation always overlays a primary land use designation. Although special standards may apply to development within such corridors (e.g., design review criteria), uses allowed and corresponding zoning and development standards, including building intensity and population density, are factors of the primary land use designations.

- *GOAL N-23: Scenic resources of high quality which will continue to be enjoyed by residents and visitors and which will continue to be an asset to the reputation and economic resources of Lassen County.*

- *NR78 POLICY: The County has identified areas of scenic importance and sensitivity along state highways and major County roads and has designated those areas as "Scenic Corridors". (Refer to the General Plan land use map and related designations in various area plans, which may also be regarded as "scenic highway corridors".) The County will develop and enforce policies and regulations to protect areas designated as scenic corridors from unjustified levels of visual deterioration.*

- *Implementation Measure NR-V: Areas designated and zoned for development in scenic corridors shall be zoned as "Design Review Combining Districts" or otherwise regulated to require review and management by the County of the visual impacts of proposed development.*

- *Implementation Measure NR-W: The County shall adopt design and development standards for use in "Design Review" areas and scenic corridors to guide the*

consideration and management of potential significant impacts to scenic resources.

- *AG13 POLICY: The operation of a minor non-agricultural activity by the owner of agricultural land on lands designated for agriculture, when such use is clearly subordinate to and does not reduce, constrain, or interfere with agricultural operations on the property or in the vicinity, shall not be interpreted by the County as a "conversion" of agricultural land pursuant to the General Plan…*

The proposed project is consistent with the above land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect and therefore will result in less than significant impacts to such land use plans, policies, and regulations.

(c) The proposed project does not conflict with any known applicable habitat conservation plan or natural community conservation plan.

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

DISCUSSION:

(a) It is well-known that the proximity of good schools ranks highly on parents' decisions regarding where to live, so it is conceivable that some parents might decide to move near the vicinity of the school in order that their children might attend (e.g., should the school have stellar test scores or provide high-quality extra-curricular activities). However, it is very unlikely that the proposed charter school would induce substantial population growth. Long Valley Charter School already has a campus in Doyle, approximately 1.5 miles north along U.S. Highway 395 at 436-965 Susan Drive (APN 141-060-35) that is closing. Students and staff will be moving to the new location; the number of students and staff at the new location are anticipated to be similar to the number at the Susan Drive address (i.e., the population that will use the charter school at the new location already exists in and around Doyle).

Furthermore, the project does not propose any housing or commercial development, nor the extension of roads or other infrastructure. Such development proposals would be analyzed at the time they were proposed.

For these reasons, the project will have a less than significant impact to population growth in the area, either directly or indirectly.

(b) The project will not displace any existing housing and will not necessitate the construction of replacement housing elsewhere.

(c) The project will not displace any people and will not necessitate the construction of replacement housing elsewhere.

3. GEOLOGIC PROBLEMS. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Expose people or structures to 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 18-1-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 waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

DISCUSSION:

(a, c) According to the California Department of Conservation California Geological Survey's *Earthquake Fault Zone, Special Studies Zone Maps* for the Doyle Quadrangle, effective November 1991, the Doyle Quadrangle has several "active faults" (considered to have been active during Holocene time); however, the project site itself is not in a special studies zone (active fault) boundary. The nearest fault zone is approximately 1,000 northeast of the project site, near Long Valley Creek. The site is not located on an earthquake fault, and the slope of the subject parcel is negligible (between 0 and 2 percent).

Therefore, the proposed project would not expose people or structures to potential substantial adverse effect, including the risk of loss, injury, or death involving the 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, strong seismic ground shaking, seismic-related ground failure (including liquefaction), or landslides. Furthermore, the project is not located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and the project would not potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. There is a less than significant effect to the environment on account of the above.

(b) The lack of steep slopes at the project site alleviates the potential for substantial erosion, and therefore the project will result in a less than significant effect related to erosion.

According to the U.S. Department of Agriculture, topsoil is "the upper part of the soil, which is the most favorable material for plant growth. It is ordinarily rich in organic matter and is used to topdress roadbanks, lawns, and land affected by mining."[3] NRCS's Web Soil Survey rates Calpine sandy loam as a "fair" potential source of topsoil (as opposed to a "good" or "poor" source. Limiting factors to impacts to topsoil include the fact that only two acres of the 107.49-acre subject parcels will be disturbed. In light of these considerations, the project will result in a less than significant loss of topsoil.

(d) Expansive soils are predominantly comprised of clays, which expand in volume when water is absorbed and shrink when the soil dries. Expansion is measured by shrink-swell potential, which is the volume change in soil with a gain in moisture. Soils with a moderate to high shrink-swell potential can cause damage to buildings and infrastructure. According to the NRCS's Web Soil Survey, Calpine sandy loam is a "silty sand" as defined by the Unified Soil Classification System. Silty sand is classified as a coarse-grained soil, meaning that more than 50 percent of material is

[3] United States Department of Agriculture. *Glossary of Soil Survey Terms*, October 2015. Online at: https://www.nrcs.usda.gov/wps/portal/nrcs/main/soils/ref/. Site visited September 11, 2018.

larger than a No. 200 sieve size. Clays, however, are classified as fine-grained soil, meaning that 50 percent or more of material is smaller than a No. 200 sieve size. Calpine sandy loam, 0 to 2 percent slopes, comprises only 10 percent clay (contrast with 66.6 percent sand, 23.4 percent silt). Calpine sandy loam, 0 to 2 percent slopes, has a low linear extensibility (shrink-swell potential) of 0.9 percent.[4]

Furthermore, the California Supreme Court has determined that ordinary "CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impacts on a project and its users or residents."[5] Therefore, any impacts to students or staff at the school on account of expansive soils would not be analyzed in this document.

In light of the above, the proposed project will not create substantial risks to life or property. Therefore, there is a less than significant impact to the environment on account of expansive soil.

(e) According to NRCS's Web Soil Survey, "Septic tank absorption fields are areas in which effluent from a septic tank is distributed into the soil through subsurface tiles or perforated pipe. The ratings are based on the soil properties that affect absorption of the effluent, construction and maintenance of the system, and public health." Calpine sandy loam is rated "not limited." Good performance and very low maintenance may be expected. In light of the above, there is a less than significant impact on account of the above.

[4] Natural Resources Conservation Service. *National Soil Survey Handbook*, amended November 2017, (Figure 618-A12 on Page 618-A.40) classifies shrink-swell as "low" for soils with a linear extensibility percent of less than three percent. Online at: https://directives.sc.egov.usda.gov/OpenNonWebContent.aspx?content=41981.wba. Site visited September 25, 2018.

[5] *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Case No. S213478.

4. HYDROLOGY AND WATER QUALITY. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☐	☒
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) 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?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒

i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j)	Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

DISCUSSION:

(a) Waste water discharge to surface and groundwater is regulated by the Lahontan Regional Water Quality Control Board, who has not responded to a Notice of Early Consultation that the Lassen County Department of Planning and Building Services sent by email on August 24, 2018. This project will not violate any water quality standards. In addition, the placement of septic tanks and routing of leach lines is regulated by the Lassen County Department of Environmental Health. The proposed project does not violate any known water quality standards or waste discharge requirements, although both of the above agencies will receive a copy of this initial study during the public comment period in order to have an opportunity to provide comment.

(b) The project will not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. The project site is in the Honey Lake Valley Groundwater Basin; according to the California Department of Water Resources Groundwater Bulletin 118 (last updated February 27, 2004), the total volume of water stored in the upper 100 feet of saturated basin-fill deposits and volcanic-rock aquifers in the Honey Lake Groundwater Basin is estimated to be 10 million acre-feet. Since there are approximately 326,000 gallons in one acre-foot, and an estimated 10 million acre-feet in the upper 100 feet of the Honey Lake Valley Groundwater Basin, the proposed project is extremely unlikely to substantially deplete groundwater supplies.

Furthermore, the proposed charter school will replace an existing charter school that is approximately 1.5 miles northwest of the project site along U.S. Highway 395. Students and staff will transfer to the proposed charter school. Therefore, proposed water usage is not likely to increase substantially above what already exists at the project site.

(c) The project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site. There are no rivers or streams at the project site, although Long Valley Creek and Willow Ranch Creek do traverse APN 141-050-94. Willow Ranch Creek is in excess of 1,000 feet from the project site, whereas Long Valley Creek is approximately 2,000 feet from the project site.

(d) The project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding

on- or off-site. The project site is completely underlain with Calpine sandy loam According to the NRCS Web Soil Survey, Calpine sandy loam has a "none" rating for flooding, meaning that flooding is not probable. The chance of flooding is nearly zero percent in any year; flooding occurs less than once in 500 years. Moreover, said database classifies Calpine sandy loam as "well drained"[6] meaning it has low runoff potential. Also see subsection (e) below.

Lastly, as indicated in the "Hydrology" portion of the "Environmental Setting" Section of this initial study, the Federal Emergency Management Agency identifies the subject parcels as mostly in a Zone "X" floodplain zone, defined as an "area of minimal flood hazard" (Zone "X," Panel #06035C2640D, 9/3/2010), although the portion of APN 141-050-94 near Long Valley Creek is in a Zone "A" floodplain zone, defined as "areas subject to inundation by the 1-percent-annual-chance flood event."

(e) The project will not create contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. According to the NRCS Web Soil Survey[7], Calpine sandy loam is in a "very low" runoff class. Also see subsection (d) above.

(f) The project will not otherwise substantially degrade water quality.

(g) There are no homes proposed as part of the project; neither is the project site in the 100-year floodplain.

(h) The project site is not in the 100-year floodplain.

(i) The project will not expose people or structures to a significant risk of loss, injury, or death involving flooding.

(j) The project will not expose people or structures to a significant risk of loss, injury, or death by inundation on account of a seiche, tsunami, or mudflow.

Given the above considerations, the project will result in less than a significant effect to water quality and hydrology.

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[6] The United States Department of Agriculture's *Soil Survey Manual (Handbook No. 18)*, issued in March of 2017, gives the following definitions for the natural drainage classes identified above:

Well drained: Water is removed from the soil readily but not rapidly. Internal free water occurrence is deep or very deep; annual duration is not specified. Water is available to plants throughout most of the growing season in humid regions. Wetness does not inhibit root growth for significant periods during most growing seasons. The soils are mainly free of, or are deep or very deep to, redoximorphic features related to wetness.

[7] Furthermore, said database classifies both as "Hydrologic Soil Group A" soils, meaning that they have a high infiltration rate (low runoff potential) when thoroughly wet and consist of deep, well drained to excessively drained (see footnote above) sands or gravelly sand that have a high rate of water transmission.

5. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☐	☒
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☐	☒

DISCUSSION:

The following goals, policies and implementation measures that pertain to air quality found in the *Lassen County General Plan, 2000* inform the analysis of this section:

> *GOAL N-22: Air quality of high standards to safeguard public health, visual quality, and the reputation of Lassen County as an area of exceptional air quality.*
>
> *NR74 POLICY: The Board of Supervisors will continue to consider, adopt and enforce feasible air quality standards which protect the quality of the County's air resources.*
>
> *Implementation Measure NR-Q: The County will continue to regulate the emission of pollutants within its jurisdiction through the regulations and procedures adopted for the Lassen County Air Pollution Control District (APCB).*

The United States Environmental Protection Agency (EPA) makes national designations for six airborne pollutants: ozone (O_3), particulate matter (suspended particulate matter [PM_{10}][8] and fine suspended particulate matter [$PM_{2.5}$][9]), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead (Pb). These pollutants are regulated by the EPA's National Ambient Air Quality Standards (NAAQS), which measure the maximum amount of a pollutant that can be present in outdoor air over a specific period of time without harming public health. Lassen County is either "in attainment" or "unclassified" pursuant to the national area designations prepared by the EPA. Federal law requires that all states attain the NAAQS[10].

California also has ambient air quality standards (California Ambient Air Quality Standards or CAAQS) that predate the original NAAQS. In addition to the six criteria pollutants above, the CAAQS monitor four more: sulfates, hydrogen sulfide, visibility reducing particles, and vinyl chloride[11], although attainment[12] of the NAAQS has precedence over attainment of the CAAQS. With the exception of vinyl chloride, the CAAQS pollutants are monitored by the California Air Resources Board (CARB).

CARB has designated Lassen County as "in attainment" or "unclassified"[13] in relation to the CAAQS for every pollutant except for PM_{10} (Lassen County's carbon monoxide and hydrogen sulfide levels are unclassified like the rest of the Northeast Plateau Air Basin; its visibility-reducing particle levels are also unclassified like the rest of California, except for Lake County). Notably, almost every county in California exceeds the state standards for airborne particulates.

Under state law, local and regional air pollution control districts have the primary responsibility for controlling air pollutant emissions from all sources other than vehicular sources.[14] CARB

[8] Particulate matter 10 microns (micrometer) in diameter or less.

[9] Particulate matter 2.5 microns in (micrometer) diameter or less.

[10] The "unclassified" designation does not violate the NAAQS.

[11] California Air Resources Board (CARB, or alternately, ARB). Vinyl chloride is a colorless gas with a mild, sweet odor. Most vinyl chloride is used in the process of making polyvinyl chloride (PVC) plastic and vinyl products, and thus may be emitted from industrial processes. Vinyl chloride has been detected near landfills, sewage treatment plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents, although levels above the standard have not been measured in California since the 1970's. Today, vinyl chloride exposure is primarily an occupational concern. Vinyl chloride is the only pollutant that has a California Ambient Air Quality Standard and is also listed as a toxic air contaminant because of its carcinogenicity. Current regulatory efforts are under ARB's Air Toxics Program. Given the above, project-induced impacts related to the emission of vinyl chloride has been determined to have no known impact. Online at: https://www.arb.ca.gov/research/aaqs/common-pollutants/vc/vc.htm. Site visited September 5, 2018.

[12] "Attainment" is the category given to an area with no violations in the last three years.

[13] "Unclassified" is the category given to an area with insufficient data.

[14] *Lassen County 2012 Regional Transportation Plan.* Control of vehicular air pollutant emissions is the responsibility of the California Air Resources Board (CARB).

divides California into air basins and adopts standards of quality for each air basin. Lassen County is part of the Northeast Plateau Air Basin (along with Modoc and Siskiyou counties) and its air quality is managed locally by the Lassen County Air Pollution Control District. According to the Lassen County Air Pollution Control District (APCD), the Air Quality Index in Lassen County is classified as "GOOD"[15] for the majority of the year, although events such as wildfires and inversion layers in winter months can periodically degrade air quality.[16] More specifically, the *Wendel Planning Area: Master Environmental Assessment, 1983* describes the air in the Wendel Planning Area as "remarkably clear and dry," further indicating good air quality.

According to the *Lassen County 2012 Regional Transportation Plan* (RTP), PM_{10} can be caused by sources including fugitive dust, combustion from automobiles and heating, road salt, and conifers, among others. "Constituents that comprise suspended particulates include organic, sulfate, and nitrate aerosols that are formed in the air from emitted hydrocarbons, chloride, sulfur oxides, and oxides of nitrogen. Particulates reduce visibility and pose a health hazard by causing respiratory and related problems." CARB further identifies motor vehicles, wood-burning stoves and fireplaces, dust from construction, landfills, and agriculture, wildfires and brush/waste burning, industrial sources, and windblown dust from open lands as major sources of PM_{10}. Among other measures, CARB generally recommends dust control for roads and construction, landscaping and fencing to reduce windblown dust, and driving slowly on unpaved roads and other dirt surfaces to reduce PM_{10} pollution.

In addition, APCD Rule 4:18, titled "Fugitive Dust Emissions," states that "reasonable precautions shall be taken to prevent particulate matter from becoming airborne" and allows for the application of "asphalt, oil, water, or suitable chemicals to dirt roads, material stockpiles, land clearing, excavation, grading or other surfaces which can give rise to airborne dusts."

This Initial Study will be referred to the Lassen County Air Pollution Control Officer for comment, as said officer is charged with enforcing the rules and regulations pertaining to air quality known as the Rules and Regulations of the Lassen County Air Pollution Control District (APCD Rule 1:1-Title).

(a) The project will not conflict with or obstruct implementation of any applicable air quality plan.

(b) The project will not violate any air quality standard nor contribute substantially to an existing or projected air quality violation.

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[15] *Lassen County 2012 Regional Transportation Plan.* The low population density (7.7 people per square mile), limited number of industrial installations, the fact that over half of Lassen County is forest land all contribute to Lassen County's good air quality.

[16] If natural events generate pollutants that exceed the CAAQS, CARB may designate such exceptional events "exceedances" and not necessarily violations of the CAAQS.

(c, d, e) The project will result in some emission of pollutant particulate matter (including PM_{10}, the only criteria pollutant for which Lassen County is in non-attainment under the California Ambient Air Quality Standards), both during construction and on account of the vehicle trips to access the project site.

The applicant estimates that approximately 2 acres of land will be disturbed by site grading. The applicant also indicates that standard construction equipment such as excavators, graders, backhoes, trucks, and man lifts will be used during construction, which is expected to take approximately nine months. However, in the email submitted to Associate Planner Stefano Richichi dated July 24, 2018, the applicant states that measures to reduce fugitive dust such as "placing water on disturbed soil" will be implemented to reduce air quality impacts related to fugitive dust a less than significant level. In addition, because the proposed charter school is a relocation of an existing charter school (said existing school is approximately 1.5 miles north of the project site along U. S. Highway 395) and a similar number of students and staff will use the new site, vehicle emissions of PM_{10} are unlikely to increase to a significant level.

Furthermore, the nearest sensitive receptors are approximately 1,100 and 600 feet from the project site (a residence and church, respectively; the closest edge of the Town of Doyle is approximately 900 feet southeast of the project site), but much of the land surrounding the project site to the north and east is undeveloped, vacant land, thus reducing the number of sensitive receptors in the project vicinity. The project will not expose sensitive receptors to substantial pollutant concentrations. Lastly, the project will not create objectionable odors affecting a substantial number of people.

Given the above considerations, the project will result in a less than significant impact to air quality.

6. TRANSPORTATION/TRAFFIC. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☐	☒
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
g) Adversely affect rail, waterborne or air traffic?	☐	☐	☒	☐

DISCUSSION:

The primary roads that provide access to the project site are U.S. Highway 395 and Doyle Loop Road. According to the *Lassen County General Plan, 2000* and the *Lassen County 2012 Regional Transportation Plan* (RTP), U.S. Highway 395 is classified as an interstate or "principal arterial." Principal arterials provide the highest level of service at the greatest

speed for the longest uninterrupted distance, with some degree of access control. The RTP classifies Doyle Loop Road as a "local road." The Federal Highway Administration describes local roads not defined as arterials or collectors whose primary function is to provide direct access to individual properties, with little or no through movement. The majority of maintained roads in Lassen County are classified as local roads.

Typically, U.S. Highway 395 closes to trucks several times a year due to high winds and icy conditions. There are few alternate routes available, with limited services nearby such as gas stations and lodging. According to Figure 3 of the RTP, titled Lassen County State Highway Segment Existing Daily Level of Service, U.S. Highway 395 has a Level of Service rating of "C" from SR 36 to the Nevada State Line, consistent with the goal for the RTP.[17]

In addition, the following goals, policies, and implementation measures from the Circulation Element of the *Lassen County General Plan, 2000*, inform the project:

- *GOAL C-1: A comprehensive, efficient and safe transportation system to serve the needs of County residents and to stimulate the economic progress of Lassen County.*

- *CE 12 POLICY: No public highway or roadway should be allowed to fall or exist for a substantial amount of time at or below a Level of Service rating of 'E (i.e., road at or near capacity; reduced speeds; extremely difficult to maneuver; some stoppages).*

- *CE14 POLICY: The County shall continue to encourage and support the improvement of Highway 395 from Johnstonville to Hallelujah Junction as a four-lane expressway.*

- *CE15 POLICY: Until Highway 395 can be upgraded to a four-lane expressway, the County supports the incremental addition of lanes, including increased numbers of passing lanes, and will work with Caltrans and the local transportation agency in the consideration and implementation of access management policies to protect traffic efficiency and safety and to facilitate future highway improvements. Such measures include the limitation of new encroachments onto Highway 395.*

- *Implementation Measure CE-E: The County shall consider the acquisition of needed right-of-way dedications with the approval of subdivisions, use permits, and other discretionary actions.*

[17] Table CE-1 of the *Lassen County General Plan, 2000*, titled "Level of Service (LOS) Ratings," describes the Level of Service "C" rating as "stable flow driving but significantly affected by other traffic."

- *GOAL C-2: Adequate, cost-effective public transit services, especially to accommodate the needs of the elderly and handicapped.*

(a, b, d) On September 17, 2018, Captain Sarah Richards of the Susanville Area Office of the California Highway Patrol (CHP) submitted a letter by email to the Lassen County Department of Planning and Building Services expressing concerns regarding "potential… increase[d] traffic congestion and collisions" on account of increased traffic volume resulting from the project. Specifically, Ms. Richards states, "School buses and parents picking up and dropping off children would be attempting to cross [U.S. Highway 395] during heavily traveled hours of the day, particularly in the mornings. This project may necessitate the need for additional traffic control measures to mitigate the potential increase in traffic collisions." Ms. Richards further states that "U.S. Highway 395 at this location is a two lane highway" that "[d]uring morning and afternoon commute hours…sees a high volume of traffic traveling between Nevada and the three prisons.[18]"

Ms. Richards also points out that U.S. Highway 395 is an interstate highway that services commercial truck traffic traveling between Nevada and Oregon. Ms. Richards does not specify what kinds of traffic control measures would mitigate the potential increase in traffic collisions that she describes above.

The Department of Planning and Building Services forwarded CHP's letter to the California Department of Transportation (Caltrans) on September 19, 2018, for comment. Caltrans District 2 Traffic Engineering and Operations Chief Rob Stinger, P.E. responded in an email dated September 20, 2018, stating, "If a large percentage of the parents/students are coming from the south, a right turn lane is recommended. That move from [Northbound U.S. Highway] 395 on Doyle [Loop Road] is basically a 130 degree turn which means cars and buses will need to go slower to negotiate the turn." Mr. Stinger therefore observes that cars coming from the south on U.S. Highway 395 will have to slow down to make the somewhat acute right-hand turn onto Doyle Loop Road, and that if a substantial portion of parents and/or students will be coming from the south, Mr. Stinger states that Caltrans recommends that the applicant add a right-hand turn lane to U.S. Highway 395 at Doyle Loop Road.[19]

In his email dated February 7, 2019, Project Agent Nick Trover estimates that "13 students are in the area south of the church [just south of the proposed charter school

[18] High Desert State Prison, California Correctional Center, and Federal Correctional Institution-Herlong.

[19] Neither Caltrans nor CHP explicitly express concerns about impact to traffic coming from the north (on U.S. Highway 395 that would have to turn left onto Doyle Loop Road [a southbound left turn lane exists]), although presumably such concerns could be folded into CHP's more general comments about concerns regarding the project's impacts to traffic flow and safety. Caltrans has not commented as to whether a traffic study is necessary.

site." Therefore, a right-hand turn lane is not necessary and the lack of a right-hand turn lane would not substantially increase hazards due to the lack of such a design feature.[20] This is because only approximately 13 students are anticipated to come to the school from the south.

According to the same email from Project Agent Nick Trover described above, approximately 70 to 85 students are anticipated to ride the bus to the proposed charter school, depending on the day, which is approximately half of the 150 students anticipated at the school.[21] Approximately 76 students would come by car from the north of the proposed project site, whereas an estimated four students would arrive by car from the south of the school. Given Google Earth aerial imagery dated March 21, 2014 (the most recent imagery accessible to Department of Planning and Building Services' staff), it appears that most, if not all, students arriving by automobile from the north would arrive by U.S. Highway 395.

At this point in the initial study it is important to note that the proposed charter school is a relocation of an existing charter school (said existing school is approximately 1.5 miles north of the project site along U. S. Highway 395) and a similar number of students and staff will use the new site. So here we must note the estimated number of 76 students arriving by private automobile from the north (and four from the south) as described above do not constitute an increase in 80 total automobiles on U.S. Highway 395 during the start and end of school.

In order to calculate total traffic increase on account of students at the start and end of school on any given day, we must subtract the total number of students that drive or are driven by private automobile, as well as those that might carpool. Furthermore, as charter schools do not operate like traditional public schools, not all students will begin the school day at the same time (indeed, not all students attend every day). No substantial increases in enrollment are expected, and the number of staff is anticipated to remain constant at approximately 25 to 30 total staff, so the proposed charter school would not result in much (if any) net traffic increase. Furthermore, the school year takes place from August 20 to May 30 (approximate dates). The above reasons demonstrate that impacts to traffic will be less than significant.

The above addresses traffic impacts during operation of the school; traffic impacts during construction are expected to be less than significant given the temporary nature of construction. According to the email submitted by Project Agent Nick Trover dated July 24, 2018, construction will take approximately nine months. Given U.S. Highway 395's

[20] Furthermore, Mr. Stinger states that he "do[es] not see a need for school signs on U.S [Highway] 395" because "[t]he proposed school site is not contiguous to U.S. 395 nor does it appear likely that there will be a school crossing outside the school zone." The lack of proposed or existing school signage on U.S. Highway 395 will not substantially increase hazards.

[21] See the attached bus route schedule and bus route maps (Attachment 10).

existing level of service rating of "C" from SR 36 to the Nevada State (including the stretch of highway near the project site), any impacts to traffic and transportation on account of construction will be less than significant.

The proposed charter school does not conflict with any applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. See CE12 Policy above, as said policy relates to level of service as a measure of effectiveness for the performance of the circulation system.

The proposed charter school also does not conflict with any applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. See CE12 Policy above for more information.

(c) The proposed charter school will not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risk. There is no airport or airstrip in the vicinity of the project site.

(e) The proposed charter school will not result in inadequate emergency access. The road that provides access to the project site (Doyle Loop Road) is adjacent with U.S. Highway 395, a principal arterial in Lassen County that would provide access to first responders or other emergency personnel in the case of such an emergency.

In addition, the width of the proposed driveway (24 feet, not including the proposed bike lane referenced below) that will connect the proposed charter school and related parking lot to Doyle Loop Road meets both the required widths founds at Lassen County Code Section 9.16.103(a)(1)(A) and at the State Responsibility Area (SRA) Fire Safe Regulations Section 1273.01.[22] Cal Fire has the responsibility of determining whether the proposed driveway may necessitate turnouts or turnarounds under the latter regulations. Although neither Cal Fire (nor Caltrans) have expressed concerns regarding emergency access in response to the notice of early consultation circulated for this project, both agencies will receive a copy of this initial study along with the related environmental document during the public comment period to enable them to comment on the project.

(f) The following goal and policies from the *Lassen County General Plan, 2000* relate to alternative (non-automobile-related) forms of transportation:

- *GOAL C-6: Expanded development and use of bicycle paths and pedestrian ways to reduce dependence upon automobiles.*

[22] The project site is in State Responsibility Area, meaning that the California Department of Forestry and Fire Protection (Cal Fire) provides fire protection for the project site.

- *CE26 POLICY: The County supports development and maintenance of safe and efficient alternative transportation routes that promote non-motorized forms of transportation for residents of more densely populated areas of the county to travel between home, work, businesses and schools through the planning, acquisition, development and management of trails in public right-of-ways.*

- *CE27 POLICY: When projects are planned, and where a direct nexus between growth and development and the need for trails and pathways is determined, developers should be required as a condition of project approval to contribute to the development of previously identified public trail projects.*

In addition, the policy and objective below from the *2017 Lassen Regional Transportation Plan* (RTP) relate to bicycle and pedestrian travel:

- *Policy 5.2: Where feasible and practical, support provisions of shelters and off-street facilities to promote bicycle and pedestrian travel. This includes connections to local and regional schools and recreational facilities in Lassen County with primary consideration for the safety of school children and local residents.*

- *Objective 5A: Review the status of ongoing circulation plans for various projects and require that some provisions be made for bicycle travel where appropriate. This could include requiring wider roadways from developers to accommodate on-street bike paths, or additional bike facilities to connect to existing or planned bikeways.*

Furthermore, the following policies from the *Lassen County Bikeway Master Plan, 2011* emphasize the importance placed on bicycling (and walking) as forms of transportation in Lassen County:

- ***OVERALL SYSTEM***

  The following goal and policy statements express the philosophy behind this plan and the proposed system. They stem from the County's desire to provide citizens and visitors with a bikeway system that can accommodate all trip purposes.

- ***Goal 1: Provide safe and efficient bikeways in Lassen County.***

- ***Objective:*** *Construct bikeways identified in the Lassen County Bikeway Master Plan and provide for the maintenance of both existing and new facilities.*

- ***Policies***

1.1 Maintain the County Bikeway Master Plan to identify existing and future needs, and provide specific recommendations for facilities and programs including adequate provisions for bicycle use and bikeways in all new developments.

1.2 Create a bikeway system that is cost-effective to construct and maintain; respects landowners, utilities, and special districts' property rights; and minimizes the potential for conflicts with other types of vehicles and users.

1.3 Require all bikeways to conform to design standards contained in the latest version of the Highway Design Manual, "Chapter 1000: Bikeway Planning and Design," Caltrans, unless otherwise established by the Lassen County Board of Supervisors or the City of Susanville City Council.

1.4 Update local roadway design standards to include sufficient pavement sections to accommodate bikeway facilities.

1.5 Consider a proposed route's importance in providing access to regional bikeway facilities when recommending local routes for implementation.

1.6 Coordinate with agencies such as Caltrans, Sierra County, Plumas County, Shasta County, Modoc County, and the Nevada Department of Transportation regarding implementation of the proposed system.

- ***FUTURE DEVELOPMENT***

  As development occurs in Lassen County, individual projects should be reviewed to ensure consistency with the proposed system. In addition, development projects should adhere to the policy statements below regarding access, mobility, and support facilities for bicyclists.

- ***Goal 2: Include bikeway facilities in all appropriate future development projects to facilitate on-site circulation for bicycle travel, on-site bicycle parking, and connections to the proposed system.***

- ***Objective:*** *Maximize the number of daily trips made by bicycling in future development areas.*

  Policies

  2.1 Require future development to construct and dedicate bikeways included in the proposed bikeway system as a condition of development. The bikeways should provide connectivity between new development and the proposed bikeway system.

…

2.3 Require future non-residential development to place bike racks near entrances.

2.4 Consider land-owner concerns when planning and acquiring off-street bikeway easements.

2.5 Meet the requirements of the Americans with Disabilities Act when constructing facilities contained in the proposed system, where applicable.

2.6 Require future residential developments to provide Class I or Class II bikeways to adjacent schools when designing future circulation systems.

- ***COMMUTING***

Commuters that bicycle to work can represent a larger percentage of total commute trips if a comprehensive network of bikeway facilities is developed. This plan proposes to implement such a system as defined by the following goal and policy statements.

- ***Goal 3: Develop a bikeway system that enhances safety and convenience of bicycling to work and school.***

- ***Objective:*** *Increase bicycle trips to work and school to reduce vehicle congestion and improve air quality.*

- ***Policies***

3.1 Provide connections to the proposed system from all existing and future transit facilities, stations, and terminals in Lassen County.

3.2 Provide support facilities such as bicycle racks, personal lockers, and showers at appropriate locations such as "park and ride" facilities, employment centers, schools, and commercial centers. This policy should apply to Lassen County, the City of Susanville, and to new development.

- ***SAFETY EDUCATION***

Safety education is an important aspect of increasing bicycle use. If residents perceive the bikeway system to be unsafe, they will be discouraged from using it. Therefore, the following goals and policies are intended to improve the public's knowledge of how to use the bikeway system safely.

- ***Goal 4: Educate and inform all residents and visitors of Lassen County about how to use bikeway facilities safely.***

- ***Objective:*** *Improve bicycle conditions in Lassen County by reducing accidents and increasing the number of bikeway system users.*

- ***Policies***

  4.1 Incorporate standard signing and traffic controls as established by Caltrans to ensure a high level of safety for bicyclist and motorist.

  …

  4.3 Encourage local law enforcement agencies and local school districts to cooperatively develop a comprehensive bicycle education program that is taught to all school children in Lassen County.

- ***ENVIRONMENTAL CONSIDERATIONS***

  Bikeway facilities are generally considered to benefit the environment because their use reduces demand for motorized travel. Nevertheless, the construction of specific facilities may adversely affect the environment. The following goal and policy statements have been developed to avoid and minimize potential impacts to the environment.

- ***Goal 5: Avoid adverse environmental impacts associated with the implementation of the proposed system.***

- ***Objective:*** *Mitigate potentially significant impacts to a level of less than significant.*

- ***Policies***

  5.1 Conduct environmental review consistent with the California Environmental Quality Act for individual projects as they advance to the implementation stage of development.

  5.2 Avoid areas of sensitive habitats for plants and wildlife when constructing facilities contained in the proposed system whenever feasible. If sensitive areas are affected by new routes, mitigate impacts through the appropriate California Environmental Quality Act or National Environmental Policy Act process.

5.3 Solicit and consider community input in the design and location of bikeway facilities.

5.4 Consider the effect on other transportation facilities such as travel lane widths, turn lanes, on-street parking, and on-site circulation when planning and designing on-street bikeways.

- ***MAINTENANCE AND RESPONSIBILITY***

- ***Goal 7: Develop a program to provide regular bikeway maintenance.***

- ***Objective:*** *Obtain funding or identify funding sources that will provide sufficient funding to maintain the proposed system.*

- ***Policies***

7.1 Require that bikeways and road shoulder be maintained in the best possible condition during construction and repair or remove damages or hazards when identified.

7.2 Implement a regular striping program and initiate a bicycle hazard remediation program such as sweeping, hazard identification, pavement repairs, striping, and signs along bike route, as funding becomes available.

7.3 Identify and implement funding strategies for installing and maintaining bicycle related facilities.

7.4 Recommend to appropriate City and/or County Agency to require developers to include bicycle facilities in new large proposed projects, with such facilities to either be offered for public dedication upon completion or to be held and maintained by an applicable private management organization. An assessment district may be recommended in order to provide a funding source for maintenance.

7.5 In instances where bicycle facilities are required as a part of a proposed private development, developers may also be required to fund pre-construction and construction costs associated with proposed bicycle facilities.

- ***SUPPORT FACILITIES***

Bikeway support facilities include physical infrastructure designed to accommodate or promote the use of bicycles. Examples include bicycle racks, bicycle lockers, restrooms, and shower facilities… Support facilities are important because potential riders can be discouraged from riding if they think

that their bicycle may be stolen or vandalized or if sufficient facilities are not provided to make bicycling convenient.

In many cities and counties, the installation of secure bicycle parking is required as part of local transportation system management plans or the zoning code to encourage the use of bicycles as an alternative to automobile use…

- ***BICYCLE SAFETY***

According to the California Statewide Integrated Traffic Records System, five bicycle accidents were reported in Lassen County between January 2007 and December 2009.[23] Primary causes of these accidents generally resulted from illegal turns or other vehicle code violations by bicyclists

- ***EXISTING MAJOR ACTIVITY CENTERS***

One purpose of a bikeway master plan is to provide improved linkages from residential areas to employment, commercial, education and recreational centers. These linkages support bicycle travel demand for both commuter and recreational trip purposes. Major activity centers in Lassen County include regional commercial areas, large residential developments, employment and education centers, schools, and parks (see Figure 1-4). Most of these centers are located within the urbanized areas of the County and are located along or near a state highway (Long Valley Charter School's existing location is shown on Figure 1-4).

- ***FUTURE BICYCLE RIDERSHIP***

Future bicycle ridership levels will depend on a number of factors such as demographics, the location, density and type of future land development, and the availability of bikeway facilities…

PROPOSED SYSTEM

- ***PROPOSED SYSTEM DEVELOPMENT***

This selection of individual routes for the proposed system was based on the following bikeway planning criteria:

- *Safety – The system should provide the highest level of safety possible while eliminating major safety concerns such as narrow roadways.*

[23] All five of the accidents involved a collision between a bicycle and a vehicle and resulted in minor injuries (no fatalities).

- *Connectivity – The system should provide bikeway connections to major activity centers, multi-modal transfer locations, and to routes that provide access to neighboring counties. Activity centers include residential neighborhoods, schools, regional parks, shopping centers, employment centers, government centers, transit centers, and other recreational opportunities. Major gaps and barriers, including narrow bridges and roadways, should be targeted as high priority items.*

- *On-Street Bikeways – Class II bike lanes should be provided as the preferred on-street bikeway facility. Class III bike routes should be used when Class II bike lanes are not feasible due to existing physical, environmental, or funding constraints… Regular sweeping of these routes will increase safety and use of the route for cyclists.*

- *Off-Street Bikeways – Where feasible, Class I bike paths on grade separated rights-of-way should be implemented. These bikeways provide a higher degree of safety and recreational benefit than bikeways located on streets. They can also become linear parks, adding to the range of amenities for local communities. In many areas of Lassen County, the cost of constructing off-street bikeways may be competitive with that for on-street facilities due to the physical characteristics of the existing roadway system. However, off street bikeways are used by pedestrians as a means of traversing the routes. Regular sweeping of these routes will increase safety and use of the route for cyclists.*

- *[F]our foot shoulders and 12-foot travel lanes (i.e., 32-foot paved section) are desirable on all roadways used by bicyclists…* (Page 22)

- ***SUPPORT FACILITIES AND PROGRAMS***

- ***BICYCLE PARKING, SHOWER, AND LOCKER FACILTIES***

  Support facilities such as bicycle parking, shower and locker facilities can encourage bicycling by reducing the threat of theft and making riding more convenient. Properly designed bike racks should be available at major bicycle destinations in Lassen County. For the most part, these facilities should be required for new developments that are likely to experience a demand for bicycle parking such as commercial areas, parks, libraries, schools, and major employers… The type of parking facility (bike rack or bicycle locker) should be selected based on (a) cost, (b) ease of use, and (c) ability to prevent theft….

- *The following action is recommended for increasing the number of locations with bicycle parking, shower, and locker facilities:*

  Require the installation of bicycle parking, shower, and locker facilities as conditions of approval for major new developments.

- ***CROSSING PROTECTION***

  These improvements should be targeted for major intersections on the proposed bikeway network, and at locations where school children cross a busy street to gain access to their school. The following steps are recommended to build up this effort.

- *Use signing, striping, crossing guards, flashing beacons, and pedestrian actuated signals at street crossings with high levels of pedestrian and bicycle demand when warranted by engineering standards.*

- ***EDUCATIONAL PROGRAMS***

  Programs to teach existing and potential bicyclists about the fundamentals of bicycle riding are important to establish good riding habits. Currently, elementary school children in Lassen County are given regular bicycle-riding safety education by law enforcement officials from both the Susanville Police Department and the California Highway Patrol. The following steps are recommended to build upon this effort.

- *Continue and expand the current bicycle education program for school children. The existing programs are offered on an as needed basis without interagency cooperation. A coordinated proactive effort between the California Highway Patrol and local law enforcement agencies would be more efficient and productive.*

- *[U]nlike the roadway system that is maintained by the County and Caltrans, off-street bike paths can be maintained by private groups such as volunteer organizations. (Page 29)*

COST AND FUNDING ANALYSIS

- ***LOCAL SOURCES***

  Future road widening and construction projects are one means of providing on-street bikeways. To ensure that roadway construction projects provide these facilities where needed, roadway design standards need to include minimum

cross-sections that have sufficient pavement for on-site street bikeways and the review process for new developments should include input pertaining to consistency with the proposed system. Future development will contribute to the implementation of new bikeway facilities only if projects are conditioned and roadway design standards are updated to include bikeway facilities.

IMPLEMENTATION

- ***BIKEWAY DESIGN STANDARDS***

  The Caltrans Highway Design Manual gives extensive detail on design for bikeways. The Caltrans standards provide a good framework for future implementation, but may not always be feasible in the rugged terrain of Lassen County. Bikeway design and planning standards are continually changing and expanding… Example of typical standards design treatments for Class I, Class II, and Class III bikeways are provided in Figures 7 through 9 (of the Bikeway Master Plan). *This information is provided to assist local agency staff in the design and construction of future bikeway facilities.*

- ## *MAINTENANCE*

  Maintenance of existing trails should be in place before any effort is made to obtain or create future trail systems.

  For proposed future development, a long range maintenance plan for trails should be included as a condition of approval as deemed applicable by the appropriate governing City and/or County Agency. At a minimum, staffing, funding and materials should be included as part of the maintenance plan.

Lastly, the *Lassen County Energy Element, 1993* contains the following policies that are relevant to the project:

- *Land Use and Transportation Policy 3: Bicycle access and convenient bicycle parking spaces shall be required at schools, libraries, parks, multi-family residential development, and commercial centers. Streets and roadways in the County shall, within design and economic constraints, have bike lanes or shoulders providing for safe bicycle riding.*

Furthermore, the following policies and excerpt from the energy element of the general plan that relate both to energy and transportation (in addition to Land Use and Transportation Policy 3 above) state as follows:

- *Land Use and Transportation Policy 1: In order to minimize vehicular travel and the resulting consumption of fuel, the pattern of residential, commercial, and industrial land use shall be compact and relate to transit routes and centers.*

- *Land Use and Transportation Policy 2: Development of vacant lots within developed areas (infill), or orderly expansion to adjacent areas, is encouraged over leapfrog development.*

- *3.4 OPPORTUNITIES FOR ENERGY CONSERVATION*

  3.4.7 Transportation and Land Use Planning

  In general, the energy required to meet transportation needs is directly related to land use development patterns. It should be noted that, traditionally, land use development in California has occurred in a particularly energy inefficient manner. The low density and suburban residential developments which characterize most of today's urban development require substantial energy consumption for transportation, and result in costly and less efficient provision of public services. In addition, suburban subdivisions are often located far from employment and commercial centers. Provision of public transportation in such low density development is often not economically viable and thus, this development pattern requires greater dependence on private transportation.

  Strategies proposed to promote energy conservation in the transportation sector involve reduction of car miles travelled in favor of an increase in use of public transportation. Such strategies include attempts to make public transportation more attractive, with more frequent schedules and more convenient bus stops, and to decrease the relative appeal of using private cars by reducing the number of long-term parking opportunities in urban centers, and increasing parking tolls and fees…

  For new development, a more effective reduction of individual automobile use can be achieved through efficient land use planning to reduce the distances between home-work-shopping-recreation areas. Because distances between residential, commercial, and industrial developments influence an individual's decision to walk, bicycle, drive, or use public transit, land use policies need to consider the location of housing in relation to shopping and employment centers. Recreation opportunities should also be provided within, or in the vicinity of, a residential neighborhood. Higher density and clustered development should be encouraged. Development of vacant lots within developed areas (infill) should be preferred over leapfrog development, Large commercial and office developments should be required to devote space for shops and services (such as dry cleaners, banks, convenience stores, and restaurants) to serve employees. In addition, the design of street layouts in the neighborhood should favor walking, bicycling, and the use of

> *public transportation. Bicycle routes and pedestrian pathways should be provided connecting residential units with nearby schools, recreation facilities, centers of employment, and commercial areas. Bus stops should be at convenient locations. A balanced growth and distribution of commercial, industrial, and residential expansion in a community can decrease the number and length of vehicle trips and assure more efficient usage of transportation-related energy.*

In light of the myriad policies, plans, and programs that promote different forms of active transportation (and specifically relate cycling infrastructure to schools), the applicant has agreed to construct a five-foot (Class II) bicycle lane along the driveway that will provide access to the school, as well as provide on-site bicycle parking facilities. These proposals will be included as conditions of approval for this project. In the future, this bike lane would preferably be linked to forthcoming bike lanes on Doyle Loop Road, thereby increasing connectivity and facilitating increased active transportation opportunities, if the County were able to secure funding for such future infrastructure projects.

Moreover, as mentioned above, approximately half of the anticipated 150 students are expected to ride the bus provided by Long Valley Charter School, thereby providing a form of "public transit."

For the reasons presented above, the proposed project will not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities in such a way so as to cause more than a less than significant effect on the environment as it relates to transportation and traffic.

Additionally, this initial study will be sent to the California Department of Transportation (Caltrans), the California Highway Patrol (CHP), and the Lassen County Department of Public Works for comment during the public comment period.

Also see Section 14, titled "Energy," regarding policies that overlap in their promotion of active transportation and energy conservation measures.

(g) In its letter dated September 11, 2018, Union Pacific Railroad (UPRR) identified several concerns related to the project. Said concerns are outlined below:

<u>Trespassing</u>

UPRR states that approval of the proposed project "will likely increase pedestrian traffic and trespassing onto the railroad right-of-way." UPRR requests that the County require the project developer to

> *install vandal resistant fencing at least 8 feet or taller (without impairing visibility), pavement marking and "no trespassing" signs designed to prevent*

> *individuals from trespassing onto the railroad tracks. All pedestrians and cyclists should be directed to use designated rail crossings by utilizing appropriate signage and paths. Buffers and setbacks should also be required adjacent to the right-of-way.*

Increased Traffic Impact

Similar to the above, UPRR states:

> *Additionally, an increase in pedestrian and vehicular traffic may conflict with train operations causing trains to proceed more slowly through the City [sic], an/or make more frequent emergency stops, which would make rail service less effective and efficient. Should this project be approved, the project developer and the City [sic] should examine any increase in vehicular and pedestrian traffic and the impacts on the nearby at-grade road crossing to see what additional mitigation measures should be included in the Project.*

At this point in the initial study it is important to note that CEQA requires lead agencies to analyze the project's impacts on the environment, not the environment's impact on users of a project (see *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). Therefore, safety concerns related to school users, while important, are outside of the scope of this initial study. This initial study will only analyze the project's potential impacts on the environment; in this subsection, the project's impacts to rail traffic.

The vast majority of students and staff that will be "using" (attending or working at) the charter school (and the Town of Doyle and all of the housing subdivisions in the area) are west of the railroad, and will not have to cross the railroad in order to access the school. Furthermore, there already is a marked rail crossing with signage at the railroad line's intersection with Clark Street in Doyle, and any increase in use is expected to be insignificant. The Hackstaff Road crossing, approximately three-quarters of a mile south of the proposed location of the charter school, will likely see only a negligible increase in use, if any increase in use at all.

Noise and Vibration Impact

UPRR goes on to state that the 24-hour rail operations generate noise and vibration that one would expect from an active railway, and that any increase in pedestrian and vehicular traffic over and around at-grade crossings "may result in additional horn use by railroad employees."

> *As a mitigation measure, the developer should disclose to the general public, including residents of the proposed development, the daytime and nighttime noise levels naturally occurring with rail service, including sounding horns at vehicle*

> *crossing where required, as well as the pre-existing and predictably-occurring noise vibration. These disclosures should note that train volume may increase in the future. The Project's development plans should also include appropriate mitigation measures, such as construction of sound barrier walls or landscape buffers, and/or use of sound-proofing materials and techniques.*

As discussed above, CEQA only addresses project impacts on the environment, not impacts from the environment (such as rail traffic) on users of the proposed project. While some of the ideas brought up by UPRR may be worthy of consideration as conditions to be required through the use permit process, they are not appropriate subject matter for this initial study.

Drainage and Project Construction

UPRR further requests that the County ensure that the drainage plan relating to the project "does not shift storm water drainage towards [Union Pacific Railroad Company] property and infrastructure. UPRR states that any runoff onto its property may cause damage to its facilities resulting in a public safety issue. UPRR recommends that the applicant mitigate all safety risks and impacts of the railroads' 24-hour operations during the construction of the project, "including contacting [Union Pacific Railroad Company] to arrange for flaggers for work performed within twenty-five feet (25') of the nearest track."

Given the plot plan shown as Figure 2 of the attached biological study and Google Earth imagery dated March 21, 2014, the project boundary is approximately 480 feet from the railroad right-of-way at the nearest point. In addition, any impervious surfaces are an additional 250 feet from the nearest boundary of the project site. Therefore, any impervious surfaces are approximately 730 feet from the railroad line, at the closest point.

In addition, the soils at the project site are well-drained and have low run-off potential. Lastly, according to information from the Federal Emergency Management Agency, the project site is not in a flood plain. For these reasons, it is extremely unlikely that the project will adversely impact rail operations by virtue of runoff. See subsection (d) and (e) of Section 4, titled "Hydrology and Water Quality" above for more information.

On account of the above considerations, the project will result in less than significant impacts to rail traffic.

7. BIOLOGICAL RESOURCES. Would the project:	**Potentially Significant Impact**	**Less Than Significant 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 Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
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?	☐	☐	☐	☒

DISCUSSION:

(a) The following policy and implementation measures from the *Lassen County General Plan, 2000,* pertain to biological resources at the project site:

- *GOAL W-1: To protect and enhance the overall health of wildlife habitats and special resource areas to maintain healthy, abundant, and diverse wildlife populations.*

- *WE-2 POLICY: The County supports the cooperative identification of "areas of significant wildlife value" or similar designations for areas where it is demonstrated by sound biological science that the habitat values are of significant importance to the health and/or survival of one or more species of wildlife. The County may apply a special designation to these areas, and/or agree to support specific resource management objectives, policies and voluntary programs to protect wildlife resources within these areas.*

- *Implementation Measure WE-C: Information from the California Department of Fish and Game will be used by the County to evaluate potential impacts to fish and wildlife as a result of proposed County policies and land use decisions. The County shall consider recommendations from the Department of Fish and Game and other agencies, special commissions and interested organizations regarding the identification of important wildlife habitat areas and the need for measures by the County, including special general plan amendments and zoning, to provide adequate protection of wildlife resources. Information and related recommendations should be provided in a manner which can be used to formulate protective measures which can be implemented on a programmatic (as opposed to a case-by-case) basis.*

- *Implementation Measure WE-E: In review of project proposals, the County will continue to utilize the California Environmental Quality Act process to evaluate the potential for significant adverse impacts upon wildlife resources and will require appropriate related project decisions and necessary mitigation measures.*

- *WE-4 POLICY: The County recognizes that some areas which are designated and zoned for development, including but not limited to rural residential lands and areas indicated for planned development, may also have wildlife resources and open space values which need to be addressed and considered for protection. The County will address the need for protection of wildlife resources and open space values in areas which are zoned for development during the review of development proposals.*

- *WE-5 POLICY: Prior to the imposition of substantial wildlife-related mitigation measures by the County, the County shall review evidence demonstrating that the proposed action or project could otherwise have potentially significant adverse impacts to wildlife and that the proposed measures will, in fact, help accomplish practical and necessary mitigation objectives.*

- *Implementation Measure WE-F: The County shall, in consultation with land owners, sports groups, and other concerned groups, agencies and organizations, consider the use of specific resource protection and management tools for wildlife habitat when warranted, including but not limited to the use of: clustered development and conservation subdivisions; conservation easements; building restrictions such as special setbacks; natural vegetation retention requirements; mechanisms to facilitate transfers of development rights; developer credits and density bonuses; 'wildlife mitigation funds' with funds to be used for acquisition and/or improvement of wildlife habitat; land dedication to public agencies or land trusts; and habitat banking. When used as mitigation measures, such actions shall be proportional to the magnitude of impacts caused by the project in question.*

- *WE-9 POLICY: The County supports cooperation between the California Department of Fish and Game and the Nevada Department of wildlife in the management of interstate deer herds.*

- *GOAL W-2: Protection of rare, threatened, and endangered wildlife species with an ecosystem approach to habitat management which also supports multiple land uses.*

- *GOAL W-3: Enhanced opportunities for consumptive and non-consumptive uses of wildlife resources recognizing the economic, educational, recreational and aesthetic benefits these uses bring to the County.*

- *GOAL W-4: Protect and enhance the wildlife habitat of riparian areas and wetlands.*

- *WE16 POLICY: The County supports interagency efforts to protect and restore the wildlife habitat values of lakes, riverine and riparian areas and wetlands.*

- *Implementation Measure WE-H: In consideration of proposed projects which may affect lakes, streams, riparian areas or wetlands, the County will review the potential for proposed impacts through the CEQA process and require appropriate mitigation measures to avoid and mitigate significant adverse impacts.*

The applicant hired Donald Burk, Environmental Services Manager of ENPLAN Environmental and Geospatial Technologies in Redding, CA to prepare a biological study for this project. Mr. Burk prepared his *Biological Study Report, Long Valley Charter School Doyle Project* in August 2018. All page number references are to the above biological study unless otherwise stated.

As part of his study, Mr. Burk reviewed several records including the California Natural Diversity Database for special-status plants, animals, and natural communities, U.S. Fish and Wildlife Service (USFWS) records for federally listed, proposed, and candidate plant and animal species under USFWS's jurisdiction, National Marine Fisheries Service records for anadromous

fish species, the U.S. Department of Agriculture's Natural Resources Conservation Service soil records, and National Wetland Inventory Maps.

Mr. Burk also conducted a field survey on June 3, 2018 over a four-hour period from approximately 10:00 a.m. to 2:00 p.m. "[t]o determine the presence/absence of special status plant and animal species, wetlands and other 'Waters of the United States,' and other sensitive natural communities" (Page 5). Said survey consisted of "walking meandering transects throughout the study area, with more intensive evaluation in areas potentially supporting sensitive resources" (Page 5).

In its letter dated September 12, 2018, the California Department of Fish and Wildlife (CDFW), brought up several concerns related to special-status plant and wildlife species, wetlands and water quality, and lighting in response to early consultation. Those concerns and the contents of the biological study are discussed below.

Special-Status Species

In the above letter, CDFW identified that the following special-status species may occur at the project site:

- Schoolcraft's wild buckwheat (*Eriogonum microthecum* var. *schoolcraftii*)
- Lance-leaved scurf-pea (*Ladeania lanceolate*)
- Plummer's clover (*Trifolium gymnocarpon* ssp. *plummerae*)
- Western seablite (*Suaeda occidentalis*)
- Swainson's hawk (*Buteo swainsoni*)

During his field survey, Mr. Burk found none of the special-status species identified by CDFW above. Specifically, Mr. Burk states on page 9 of the *Biological Study Report, Long Valley Charter School Doyle Project*:

> *No special-status plant species were observed during the June 3, 2018, botanical field survey. Because the project site is nearly entirely covered with dense, weedy vegetation, no special-status plant species are expected to be present…No special-status animal species were observed during the field survey, nor are any expected to be present in the study area or be indirectly affected by project implementation.*

However, Table 1 of said biological study shows that habitat for multiple special-status plant species, including lance-leaved surf-pea, Plummer's clover, Pulsifer's milk-vetch, Schoolcraft's wild buckwheat, and Suksdorf's broom-rape, exists on-site. Mr. Burk states that "[t]he introduction and spread of noxious weeds during construction activities has the

potential to impact natural habitats and agricultural lands."[24] Specifically, unwashed construction vehicles can transport weed seeds to the project site. For this reason, Mr. Burk has recommended the following mitigation measure:

> *Mitigation Measure 2: Noxious Weeds.*
> *The potential for introduction and spread of noxious weeds shall be avoided/minimized by:*
>
> *a. Using only certified weed-free erosion control materials, mulch, and seed.*
>
> *b. Limiting any import or export of fill material to material that is known to be weed free.*
>
> *c. Requiring the construction contractor to thoroughly wash all construction vehicles and equipment at a commercial wash facility before and after its use at the project site.*

The Department of Planning and Building Services agrees that the applicant should comply with the above. However, given that none of the special-status plant species above were found at the project site during the field study (only potential [and in some cases marginal] habitat) and none are expected to occur at the project site, the above will be included as a condition of approval (and not a mitigation measure) because in terms of the project's baseline, no special-status plants exist on-site, and therefore, there are no special-status plants for whom impacts must be mitigated.

Migratory Birds

The biological study also states that "the study area has a low potential to support nesting birds," although "it is possible that active nests could be present in the sagebrush scrub or riparian thicket habitats in future years, or that ground-nesting birds could utilize the site." Construction activities can impact nesting migratory birds directly (construction equipment can kill or injure birds in areas containing active nests with chicks or eggs) or indirectly (causing adult migratory birds to abandon their nests in response to loud noise levels or human encroachment, or a reduction in the amount of food available to young birds due to changes in feeding behavior by adults).

[24] Mr. Burk identified at least seven noxious weeds at the project site, including "Scotch thistle, crossflower, hairy whitetop, broadleaved peppergrass, bull thistle, Russian thistle, and bindweed." See Pages 11-13 of his August 2018 *Biological Study Report, Long Valley Charter School Doyle Project* for more information.

For this reason, Mr. Burk, the consulting biologist, recommends the following mitigation:

Mitigation Measure 1: Nesting Migratory Birds.

In order to avoid impacts to nesting migratory birds and/or raptors protected under the federal Migratory Bird Treaty Act and California Fish and Game Code §3503 and §3503.5, including their nests and eggs, one of the following shall be implemented:

a. *Vegetation removal and other ground-disturbance activities associated with construction shall occur between September 1 and January 31 when birds are not nesting.*

b. *If vegetation removal or ground disturbance activities occur during the nesting season, a pre-construction nesting survey shall be conducted by a qualified biologist to identify active nests in and adjacent to the work area. The survey shall take into account acoustic impacts and line-of-sight disturbances occurring as a result of the project in order to determine a sufficient survey radius to avoid nesting birds. The results of the survey shall be submitted to the California Department of Fish and Wildlife upon completion. The survey shall be conducted no more than one week prior to the initiation of construction. If construction activities are delayed or suspended for more than one week after the pre-construction survey, the site shall be resurveyed.*

If active nests are found, the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service shall be consulted to identify appropriate actions to comply with the Migratory Bird Treaty Act and California Fish and Game Code §3503. Compliance measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified in the survey, as well as ongoing monitoring by biologists.

The Department of Planning and Building Services agrees that the applicant should comply with the above. However, given that no nesting birds were established as part of the project's baseline (since no nesting migratory birds were found during the field survey), the above will be included as a condition of approval (and not a mitigation measure) because in terms of the project's baseline, no nesting migratory birds exist at the project site, and therefore, there are no nesting migratory birds for whom impacts must be mitigated.

Lighting

In its September 12, 2018, letter CDFW states:

> *The Department recognizes the effects that artificial lighting has on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. To minimize adverse effects of artificial light on wildlife, the Department recommends that lighting fixtures associated with the Project be downward facing, fully-shielded and designed and installed to minimize photo-pollution.*

Furthermore, Lassen County Code Section 18.108.155 requires that all lighting be "designed and located so as to confine direct lighting to the premises."

Although not a mitigation, staff will construct a condition of approval that adequately addresses CDFW's lighting concerns, as well as captures the requirements of the Lassen County Code above.

In light of the above, the proposed project will have a less than significant impact on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFW or the U.S. Fish and Wildlife Service.

Please see the attached biological reports for more information.

(b, c) **Wetlands**

Mr. Burk found a wetland in the southwestern corner of APN 141-050-95, as "an intermittent stream enters the study area via a culvert under Doyle Road… [that] diffuses to a broad, moist to shallowly inundated wetland on the northeastern side of Doyle Road."[25] Although none of the plant species in the wetland are considered to be sensitive, said area "is considered sensitive because it is a wetland as defined by the U.S. Army Corps of Engineers and California Department of Fish and Wildlife."

In addition to the above-described wetland, CDFW also identified two drainages on APN 141-050-94 (Long Valley Creek and Willow Ranch Creek), as well as a third water feature "which begins at Long Valley Creek and traverses southwest to the middle of [APN 141-050-94 and] appears to have wetland characteristics per aerial imagery." In its above-described letter to the Department of Planning and Building Services, CDFW recommended that a wetland delineation be conducted to "map the water features and any riparian vegetation present."

[25] See the *Biological Study Report, Long Valley Charter School Doyle Project* for more information on particular plant species in the wetland, and also the "Riparian Scrub Wetland with Wet Meadow Fringe" in Figure 3 in said report for a visual representation of the wetland's extent.

Low Impact Development

CDFW also initially recommended that "[a] discussion on Low Impact Development (LID) methods to be used on the Project to preserve natural resources, and protect and improve water quality and availability" be included in this initial study. According to the U.S. Environmental Protection Agency,

> *LID refers to systems and practices that use or mimic natural processes that result in the infiltration, evapotranspiration or use of stormwater in order to protect water quality and associated aquatic habitat… LID is an approach to development that works with nature to manage stormwater as close to its source as possible and… employs principles such as preserving and recreating natural landscape features, minimizing effective imperviousness to create functional and appealing site drainage that treat stormwater as a resources rather than a waste product.*[26]

Bioretention facilities, rain gardens, vegetated rooftops, rain barrels, permeable pavements, natural or man-made swales, depressions, and vegetated areas all help capture and retain water onsite, "allowing time for water to soak into the soil where it is naturally filtered."[27] CDFW's comments regarding LID seek to address any stormwater drainage or runoff pollution impacts that may negatively affect habitat for plants or animal species.

Streambed Alteration Agreement

Lastly, CDFW states in the above letter, "The project may require notification to [CDFW]…prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank… of a river stream, lake, or use material from a streambed." If any of the above activities were to occur, a CDFW would require a Streambed Alteration Agreement.

In summary then, in its initial letter responding to early consultation for this project, CDFW expressed recommended that the applicant prepare a wetland delineation to map water features and any riparian vegetation, incorporate low impact development practices, and secure a Streambed Alteration Agreement from CDFW.

[26] *Urban Runoff: Low Impact Development.* U.S. Environmental Protection Agency. Found at https://www.epa.gov/nps/urban-runoff-low-impact-development. Site accessed December 21, 2018.
[27] *Benefits of Low Impact Development—How LID Can Protect Your Community's Resources.* U.S Environmental Protection Agency. https://www.epa.gov/sites/production/files/2015-09/documents/bbfs1benefits.pdf. Site accessed December 21, 2018.

Avoidance of Riparian Scrub Wetland with Wet Meadow Fringe

However, once staff explained to CDFW that the project site is underlain by Calpine sandy loam[28] and is in excess of 1,800 feet from Long Valley Creek and 1,000 feet from Willow Ranch Creek, CDFW withdrew its concerns and recommendations above except for concerns regarding potential impacts to the "riparian scrub wetland with wet meadow fringe" shown in Figure 3 (now referred to as "Figure 3 wetlands") of the attached biological study. Amy Henderson, Environmental Scientist for the California Department of Fish and Wildlife Northern Region, recommended an avoidance area "as close to 100-feet as possible" from the Figure 3 wetlands in her email to Associate Planner Stefano Richichi dated December 17, 2018.

After Nick Trover, the agent for Long Valley Charter School, proposed that the driveway to the proposed school from Doyle Loop Road be 30 to 40 feet from the Figure 3 wetlands, Ms. Henderson requested that said driveway be moved further south. Mr. Trover submitted an email dated December 18, 2018, to staff with a revised plot plan stating that the proposed driveway was now 60 feet from the Figure 3 wetlands. Staff forwarded said email and revised plot plan to Ms. Henderson, who confirmed in her email to Associate Planner Stefano Richichi dated December 19, 2018, that the 60-foot separation between the proposed driveway and the Figure 3 wetland was satisfactory. In addition, the proposed parking area is at least 100 feet from the Figure 3 wetland.

The 60- and 100-foot "avoidance areas" (from the driveway and parking area, respectively) will be required as conditions of approval for this project to address CDFW's concerns regarding potential impacts to the Figure 3 wetlands. CDFW will also receive a copy of this initial study and related environmental document during the public comment period.

Given the location of all proposed improvements as well as the avoidance areas referenced above, any impacts to riparian habitat, other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service, or federally protected wetlands as defined by Section 404 of the Clean Water Act will be less than significant.

(d) The proposed project will not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, nor will the project impede the use of native wildlife nursery sites. See discussion and condition related to migratory birds above in subsection "a."

(e) The proposed project will not conflict with any local policies or ordinances protecting biological resources.

[28] According to the Natural Resources Conservation Service's Web Soil Survey, Calpine sandy loam is "well drained" and has very low runoff potential. See Section 4, titled, "Hydrology and Water Quality" for more information regarding soil types.

(f) The proposed project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved local, regional, or state habitat conservation plan.

8. MINERAL RESOURCES. Would the project:	**Potentially Significant Impact**	**Less Than Significant 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?	☐	☐	☐	☒

DISCUSSION:

(a) The project will not result in the loss of availability of a known material resource that would be of value to the region and the residents of the state.

(b) The project will not 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.

9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	**Potentially Significant Impact**	**Less Than Significant 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) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☒	☐

DISCUSSION:

The email Project Agent Nick Trover submitted to Associate Planner Stefano Richichi on July 24, 2018, states that "[c]onstruction [of the proposed charter school] will take approximately nine months and utilize standard construction equipment such as excavators, graders, backhoes, trucks, man lifts, etc."

The applicant hired Lawrence & Associates to prepare an Environmental Site Assessment to identify any "recognized environmental conditions" (RECs) in connection with the subject APNs.[29] According to the ESA, "RECs,"

> *as defined in the ASTM E1527-13 standard, are the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property, 1) due to a release to the environment; 2) under conditions indicative of a release to the environment; or 3) under conditions that pose a material threat to a future release of the environment.*

The *Phase I Environmental Site Assessment, Proposed Long Valley Charter School Site, Lassen County Assessor's Parcel Numbers (APNs) 141-050-94-11 and 95-11, Doyle California, May 30, 2018* (ESA) prepared by Vice President Bryan Gartner and Senior Environmental Assessor/Project Manager Robert Ekin "revealed no evidence of a[n REC] in connection with the property."

However, "[a]though not considered to be…related to the presence of toxic and hazardous substances, [the ESA] investigation identified one condition of concern related to school safety due to the proximity of a main railroad line." Specifically, the north-south rail line operated by Burlington Northern Santa Fe Railroad and Union Pacific Railroad adjoins and parallels the eastern property boundary. That potential safety concern, however, is not discussed in this initial study, because CEQA requires lead agencies to analyze the project's impacts on the environment, not the environment's impact on users of a project (see *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369). See subsection (g) of Section 6, titled "Transportation/Traffic," above for a discussion on the proposed projects impacts on the rail line.

(a,b) The proposed project will not create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials, nor through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Standard construction equipment (and fuels) will be used during construction.

[29] The ESA also states that it was prepared "to meet the requirements of California Education Code sections 17210 and 17213.1 for a proposed new school site by evaluating for the presence of toxic and hazardous substances." The ESA looked for current or former dump areas, landfill areas, chemical plants, oil fields, refineries, fuel storage facilities, nuclear generating plants, abandoned farms and dairies, and agricultural areas where pesticides and fertilizer had been heavily used, as well as naturally occurring hazardous materials such as asbestos, oil, gas, in the vicinity of the school site. None were identified.

Although there may be several ways in which hazardous materials can be released into the environment (through a reasonably foreseeable upset, as floods, earthquakes, or fires could cause a release). However, the project site is not in an area that is prone to earthquakes, is out of the 100- year flood zone, and is in a Moderate Fire Hazard Severity Zone (the least hazardous classification in a State Responsibility Zone; see subsection "i" below for more information).

No hazardous materials are expected to be used during operation of the school, except for perhaps the fuel inside the one proposed school bus. Any impacts will be less than significant.

(c) The proposed project is not likely to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the existing or proposed school. Any impacts will be less than significant.

(d) The project is not located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code 65962.5, and will not create a significant hazard to the public or the environment. Staff consulted the "List of Hazardous Waste and Substances"[30] ("Cortese list") compiled by the California Department of Toxic Substances Control and the "List of Leaking Underground Storage Tank Sites"[31] compiled by the California Department of Water Resources to this effect.

(e) The project site is not within an airport land use plan or within two miles of a public airport.

(f) The project site is not within the vicinity of a known private airstrip.

(g) The project will not impair implementation of or physically interfere with any known adopted emergency response plan or known emergency evacuation plan.

(h) The project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands, for the following reasons:

First, the project is subject to the 30-foot setback requirement found at Lassen County Code Section 9.16.103(d)(1)(A). Said section is intended to reduce the spread of wildfire from building to building across property lines.

In addition, the project site is in a "Moderate" Fire Hazard Severity Zone, as opposed to a "High" or "Very High" Fire Hazard Severity Zone. The fire hazard severity zone

[30] California Department of Toxic Substances Control. EnviroStor online database. Online at: http://www.envirostor.dtsc.ca.gov/public/. Site visited January 7, 2019.
[31] State Water Resources Control Board. Geotracker online database. Online at: http://geotracker.waterboards.ca.gov/. Site visited January 7, 2019.

classification is "based on a combination of how a fire will behave and the probability of flames and embers threatening buildings."[32] This in turn is based on factors such as "fuel, slope, and fire weather." Fire hazard severity zones do not take into account modifications such as fuel reduction efforts.

The project site is also in a "State Responsibility Area" (SRA), meaning that the State of California has financial responsibility for fire and fire protection. Specifically, the California Department of Forestry and Fire Protection (Cal Fire) provides fire protection on behalf of the State of California in SRAs. The "Moderate" Fire Hazard Severity Zone is the least hazardous classification in an SRA.

Cal Fire received a Notice of Early Consultation for this project that was circulated on August 24, 2018, but has not submitted any comment regarding wildland fire concerns. Cal Fire will receive a copy of this initial study once it is circulated for public comment in order to express any concerns Cal Fire may have.

For these reasons, the proposed charter school will have a less than significant effect in terms of its exposure of people or buildings to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands.

Given the above considerations, the project will result in a less than significant impact on account of hazards and hazardous materials.

[32] California Department of Forestry and Fire Protection (Cal Fire). *Frequently Asked Questions: Questions About Fire Hazard Severity Zones.* Online at: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_faqs. Site visited January 3, 2019.

10. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire severity zones, would the project:	**Potentially Significant Impact**	**Less Than Significant 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 a wildfire or the uncontrolled spread of a 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 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?	☐	☐	☒	☐

DISCUSSION:

As stated in subsection (h) of Section 9 above, titled “Hazards and Hazardous Materials,” the proposed project is located in a “Moderate” Fire Hazard Severity Zone in a “State Responsibility Area” (SRA), meaning that the State of California has financial responsibility for fire and fire protection. Specifically, the California Department of Forestry and Fire Protection (Cal Fire) provides fire protection on behalf of the State of California in SRAs. The “Moderate” Fire Hazard Severity Zone is the least hazardous classification in an SRA. See the above subsection for more details.

(a) The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.

(b) The proposed project would not exacerbate wildfire risks due to slope, prevailing winds, or other factors, thereby exposing project occupants to pollution concentrations from a wildfire or the uncontrolled spread of a wildfire. The existing charter school is only approximately 1.5 miles north along U.S. Highway 395 and would experience a similar exposure to pollution concentrations on account of a wildfire in the area. There is nothing site-specific at the proposed location that would increase this risk. Slopes are flat at the project site.

(c) The proposed project would not require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that would exacerbate fire risk or result in temporary or ongoing substantial impacts to the environment. Any related utilities that may have to be installed will result in (at most) less than significant impacts to the environment on this score.

(d) The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As stated in previous sections, the project site is not in a flood zone as identified by the Federal Emergency Management Agency, and the site is fairly flat. In addition, the Fort Sage Mountains are approximately two miles east of the project site, and the possibility of landslides as a result of runoff or post-fire slope instability that might impact project users to significant risks are very low.

Again, Cal Fire received a Notice of Early Consultation for this project that was circulated on August 24, 2018, but has not submitted any comment regarding wildland fire concerns. Cal Fire will receive a copy of this initial study once it is circulated for public comment in order to express any concerns Cal Fire may have.

11. NOISE. Would the project result in:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

DISCUSSION:

(a-f) The proposed charter school will generate noise during its construction and operation. Construction is anticipated to take approximately nine months. The applicant proposes to begin construction late 2019 or early 2020. Once construction is completed, proposed hours of operation are from 8:00 a.m. to 3:00 p.m., Monday through Friday, from August 20 to May 30. No summer school classes are currently proposed. Approximately 150 students will attend the charter school each day (750 visits each week total).

The nearest home is approximately 1,100 feet west of the project site (across U.S. Highway 395). There is also a church approximately 600 feet to the south of the project site. Additionally, the subject parcels (and the above receptors) are adjacent to U.S. Highway

395, which can be a considerable ambient-noise generator. The closest edge of the Town of Doyle is also approximately 900 feet southeast of the project site, but much of the land surrounding the project site to the north and east is undeveloped, vacant land. The distance between the project site and potentially sensitive receptors and the project site's and sensitive receptors' proximity to the highway (a generator of considerable ambient noise) ensure that noise impacts will be less than significant.

The project site is not within an airport land use plan nor in the vicinity of a known private airstrip.

Given the above considerations, the project would result in a less than significant impact to the environment on account of noise issues.

12. PUBLIC SERVICES.

	Potentially Significant Impact	Less Than Significant 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 governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	☐	☐	☐	☒
i) Fire protection?	☐	☐	☒	☐
ii) Police protection?	☐	☐	☒	☐
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

DISCUSSION:

(a)(i-v) As stated previously, the proposed charter school is actually a relocation of an existing charter school approximately 1.5 miles north (of the proposed site) along U.S. Highway 395; the number of students and staff that will use the proposed charter school is not anticipated to change from the number that have used the existing charter school. Therefore, the project will not create more demand for public services or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the above public services.

In addition, neither the California Department of Fire and Forestry Protection (CalFire) nor the Doyle Fire Protection District, (the latter provides fire protection for the area in which the project site is in), have responded to the Notice of Early Consultation that the Lassen County Department of Planning and Building Services sent by mail on August 24, 2018. Said agencies will have an opportunity to comment on this initial study during the comment period. The Lassen County Sheriff's Office also did not respond to the above Notice of Early Consultation.

Lastly, Dixon Park in Doyle is approximately one quarter-mile southeast of the project site, while Doyle Park is approximately one mile southeast of the project site. The proposed charter school's proximity to Dixon Park especially could result in its increased use; however, said increased use is unlikely to have a substantial adverse physical impact to Dixon Park. This is especially true in light of the fact that the proposed charter school includes multiple recreational facilities for students.

For the above reasons, the project will result in a less than significant effect on the environment on account of any public services that may need to be provided.

13. UTILITIES AND SERVICE SYSTEMS.

Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☐	☒
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e) 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?	☐	☐	☐	☒
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☐	☒

DISCUSSION:

(a) The Lahontan Regional Water Quality Control Board was contacted during the early consultation study phase of this project, but did not provide comment. Therefore, there are no impacts on account of an exceedance of wastewater treatment requirement from that board known to the Department of Planning and Building Services. The above board will receive a copy of this initial study for further opportunity to comment. Also see Section 4, titled, "Hydrology and Water Quality," for more information.

(b) The proposed project will require the construction of new wastewater treatment facilities, likely in the form of individual septic tank(s). The Lassen County Department of Environmental Health has permitting authority over the above, and has not responded to the Notice of Early Consultation sent August 24, 2018. Said department will receive a copy of this initial study to provide another opportunity for comment. Moreover, the applicant must comply with any and all applicable wastewater discharge requirements of the Lassen County Department of Environmental Health. No evidence to this point has been submitted that would indicate that the proposed charter school could not comply with the above-referenced requirements. In light of the above, the environmental effects of any wastewater treatment facilities will be less than significant.

(c) The proposed parcel is not in a floodplain. Furthermore, Calpine sandy loam is well-drained and not prone to flooding. Therefore, it is very unlikely that there will be any construction of new storm water drainage facilities. See the Section 4, titled "Hydrology and Water Quality" for more information.

(d) The proposed project will have sufficient water supplies available to serve the project from existing entitlements and resources. See the Section 4, titled "Hydrology and Water Quality" for more information.

(e) No wastewater treatment provider serves or will serve the project site. The proposed charter school will be served by a septic system.

(f) The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. According to the California Department of Resources Recycling and Recovery's Solid Waste Information System (SWIS)[33], the closest, actively operational solid waste facility is the Herlong Transfer Station located at 742-500 Herlong Landfill Road in Herlong, CA 96113 (currently permitted under Permit #18-AA-0024). Said permit allows a maximum of 750 tons of throughput per year.

Furthermore, the Bass Hill Landfill receives waste from Herlong Transfer Station, as the project would be served by the Bass Hill Landfill at 469-700 Johnstonville Dump Road, located off of U.S. Highway 395 in Johnstonville. According to the California Department of Resources Recycling and Recovery's Solid Waste Information System (SWIS)[34], the landfill is currently permitted and has an estimated closure date of between 2028 and 2031. Permit #18-AA-0009 does not set a limit to the permitted tonnage of waste the landfill can receive per day. In the End Notes section, the permit also states that "the landfill can handle any maximum waste that could be generated within the county

[33] California Department of Resources Recycling and Recovery. Solid Waste Information System (SWIS). Online at: http://www.calrecycle.ca.gov/SWFacilities/Directory/. Site visited on August 14, 2018.

[34] California Department of Resources Recycling and Recovery. Solid Waste Information System (SWIS). Online at: http://www.calrecycle.ca.gov/SWFacilities/Directory/. Site visited on September 10, 2018.

without any problems." Given the above considerations, the landfill has the capacity to serve the proposed project, and there is no known impact related to this subsection.

(g) The project must comply with all federal, state, and local statutes and regulations related to solid waste. There has been no indication that the project is not in compliance with any such regulations.

Given the above considerations, the project will result in no known impact to the environment on account of utilities and service systems.

14. ENERGY. Would the project:

	Potentially Significant Impact	Less Than Significant 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?	☐	☐	☒	☐

DISCUSSION:

(a) The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, either during project construction or operation. As discussed throughout this document, the proposed project is in effect a relocation of an existing charter school project. Energy levels used during operation of the school are anticipated to be similar to those used at the current school site. Any consumption of energy resources during construction of the proposed project is likely to result in a less than significant impact. Nevertheless, the Lassen Municipal Utility District, which would provide power to the proposed school, will receive a copy of this initial study during the public comment period and will have an opportunity to provide any comments it may have in regard to this matter.

(b) The *Lassen County Energy Element, 1993* (a local plan for renewable energy or energy efficiency and part of the general plan) contains the following policies that are relevant to the project:

- *Land Use and Transportation Policy 3: Bicycle access and convenient bicycle parking spaces shall be required at schools, libraries, parks, multi-family residential development, and commercial centers. Streets and roadways in the County shall, within design and economic constraints, have bike lanes or shoulders providing for safe bicycle riding.*

- *Goal 4: Efficient utilization and management of the County's natural energy resources.*

- *General Energy Conservation Policy 1: The siting and design of new development shall maximize solar access and minimize the need for heating, cooling, and lighting.*

- *General Energy Conservation Policy 2: Whenever possible, new buildings shall be oriented with major window areas located on the southern walls and coordinated with landscaping for passive solar heating and cooling.*

- *General Energy Conservation Policy 4: The County supports the use of drought-tolerant and water conserving landscaping in new development.*

Furthermore, the following policies and excerpt from the energy element of the general plan that relate both to energy and transportation (in addition to Land Use and Transportation Policy 3 above) state as follows:

- *Land Use and Transportation Policy 1: In order to minimize vehicular travel and the resulting consumption of fuel, the pattern of residential, commercial, and industrial land use shall be compact and relate to transit routes and centers.*

- *Land Use and Transportation Policy 2: Development of vacant lots within developed areas (infill), or orderly expansion to adjacent areas, is encouraged over leapfrog development.*

- *3.4 OPPORTUNITIES FOR ENERGY CONSERVATION*

  3.4.7 Transportation and Land Use Planning

  In general, the energy required to meet transportation needs is directly related to land use development patterns. It should be noted that, traditionally, land use development in California has occurred in a particularly energy inefficient manner. The low density and suburban residential developments which characterize most of today's urban development require substantial energy consumption for transportation, and result in costly and less efficient provision of public services. In addition, suburban subdivisions are often located far from employment and commercial centers. Provision of public transportation in such low density development is often not economically viable and thus, this development pattern requires greater dependence on private transportation.

  Strategies proposed to promote energy conservation in the transportation sector involve reduction of car miles travelled in favor of an increase in use of public transportation. Such strategies include attempts to make public transportation more attractive, with more frequent schedules and more convenient bus stops, and to decrease the relative appeal of using private cars by reducing the number of long-term parking opportunities in urban centers, and increasing parking tolls and fees…

  For new development, a more effective reduction of individual automobile use can be achieved through efficient land use planning to reduce the distances between

> *home-work-shopping-recreation areas. Because distances between residential, commercial, and industrial developments influence an individual's decision to walk, bicycle, drive, or use public transit, land use policies need to consider the location of housing in relation to shopping and employment centers. Recreation opportunities should also be provided within, or in the vicinity of, a residential neighborhood. Higher density and clustered development should be encouraged. Development of vacant lots within developed areas (infill) should be preferred over leapfrog development, Large commercial and office developments should be required to devote space for shops and services (such as dry cleaners, banks, convenience stores, and restaurants) to serve employees. In addition, the design of street layouts in the neighborhood should favor walking, bicycling, and the use of public transportation. Bicycle routes and pedestrian pathways should be provided connecting residential units with nearby schools, recreation facilities, centers of employment, and commercial areas. Bus stops should be at convenient locations. A balanced growth and distribution of commercial, industrial, and residential expansion in a community can decrease the number and length of vehicle trips and assure more efficient usage of transportation-related energy.*

Several of the policies from the energy element above link energy conservation to active transportation, and in particular, Land Use and Transportation Policy 3 from that document requires bicycle access and bicycle parking for school projects, among others (the "Transportation and Land Use Planning" section excerpt from the energy element quoted above also states that "bicycle routes and pedestrian pathways *should* be provided connecting residential units with nearby schools…").

In order to comply with these policies, the applicant has agreed to construct a five-foot (Class II) bicycle lane along the driveway that will provide access to the school, as well as provide on-site bicycle parking facilities. The proposed site is near the Town of Doyle, and so students or staff coming from said direction will be able to ride their bicycle to the school, reducing potential automobile trips and fuel consumption. In the future, this bike lane would preferably be linked to forthcoming bike lanes on Doyle Loop Road, thereby increasing connectivity and facilitating increased active transportation opportunities, if the County were able to secure funding for such a project (also see Section 6, titled "Transportation/Traffic" for more information).

The applicant, however, has not proposed to design buildings with major south-facing windows, or any other design features that might promote passive (solar) heating, cooling, or lighting, or proposed to use drought-tolerant or water-conserving landscaping materials.

Nevertheless, the proposed bicycle-oriented facilities demonstrate an attempt on the applicant's part to comply with the policies of the energy element; in light of this, the proposed project will not conflict with or obstruct a state or local plan for renewable

energy or energy efficiency in such a way that would have more than a less than significant effect to the environment.

15. AESTHETICS. Would the project:

	Potentially Significant Impact	Less Than Significant 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) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION:

(a-d) The Natural Resource Element of the *Lassen County General Plan 2000*, references the 1968 general plan, which states:

> *The concept of Scenic Highways does not preclude development from occurring within the corridor covered by protective regulations. Appropriate uses along Scenic Highways can include grazing and other agriculture, homes for permanent and seasonal residents and, in planned locations, motels, restaurants and certain other commercial services. However, these basic principles should guide all development within the areas visible from the Scenic Highways:*
>
> > *The intensity and location of development should not impair natural scenic qualities.*
> >
> > *The design of all development should be in character with the natural surroundings.*
> >
> > *Where some attribute, physical or historic, indicates that an area should be left in its existing or natural state, public ownership or other rights should be acquired to insure preservation.*
>
> *The County should adopt an official County Scenic Highway designation for the routes specified. All uses along these routes or visible from them should be subject to special standards and controls which will achieve the broad goals of preserving the scenic qualities of Lassen County (Page 32).*

The Lassen County General Plan continues as follows:

> *In the process of preparing area plans since 1982, the County has utilized an evaluation system to classify scenic resources. The class designations combine several evaluation elements including: judgement of inherent scenic quality, character and diversification; sensitivity in regards to the amount and type of public exposure to the particular landscape; the distance at which the landscape is perceived (foreground, middleground, or background); and the existing extent to which an area's scenic quality has already been impacted. Although the classification system is admittedly subjective, it provides the County with a vocabulary to describe scenic resource values and to determine if and when disturbance of the landscape will result in deterioration of those values.*
>
> *The first three classifications, Classes I through III, are relative to each other and are employed to highlight landscapes having the most significant scenic resource values. The fourth classification, Class IV, is used to indicate areas in which visual elements are related more to urban-type development than to essentially natural landscape oriented scenic elements. The following discussion addresses the scenic elements within each classification:*
>
> *Class I: This classification is given to areas having the greatest scenic resource value because of one or more of the following features:*
>
> 1. *Contains distinctive landscape feature(s).*
> 2. *Is subject to significant amounts of public exposure, especially in foreground and middleground zones (i.e., along State or U.S. highways).*
> 3. *Large percentage of observers have high expectations and sensitivity for scenic quality (e.g., recreational tourists).*
>
> *Class II: These areas have one or both of the following scenic resource characteristics:*
>
> 1. *Scenic value relatively common to the region.*
> 2. *Average sensitivity due to location near local travel routes and residential areas.*
>
> *The scenic values of Class II are more-or-less common or characteristic of the region. Public exposure may be considerable, but the areas fall into a far middleground or background distance zone.*
>
> *Class III: These areas have one or both of the following scenic resource:*
>
> 1. *Landscapes have relatively minimal scenic distinction from average scenery characteristics of the region.*

2. *Have low visual sensitivity because of very low levels of public exposure due to isolation of the area.*

Because of topography and the lack of roads in these areas, the Class III areas have relatively minor amounts of public exposure. Landforms and vegetation are also generally common to the immediate region and generally lack distinctive scenic features.

Class IV: Class IV areas are generally "urbanized" to the extent that qualities of the natural landscape are largely secondary, visually, to the urban landscape. Visual elements are related largely to structural improvements or other man-made elements including such features as subdivisions, shopping centers, and industrial areas (unless the man-made element is of significant scenic value, e.g. a golf course or reservoir).

Given the above classifications, it appears that the project site would be considered a Class I or Class II scenic resource (or possibly somewhere in between). The project site could be considered to be very scenic as it is visible from U.S. Highway 395 and is in a "Scenic Highway Corridor" according to Figure 1-4 of the *Lassen County Energy Element, 1993* (approximately 300-400 feet to the east of the highway), and forms part of a flat, open field with the Fort Sage Mountains as its backdrop (the mountains are approximately 1.5 miles east of the project site, and could be considered "distinctive landscape features"). The above would provide the basis for its classification as a Class I scenic resource.

Although the subject parcel may be subject to significant amounts of public exposure indicative of a Class I scenic resource, its scenic quality has to do more with the mountains in the background than the project site itself. Flat, open fields (either in agricultural production or not) have scenic value, but such scenic value is ubiquitous throughout Lassen County. The project site is also within 900 feet of the edge of the Town of Doyle (i.e., is located near local travel routes and residential areas). For these reasons, the project site could be considered a Class II resource.

In any case, for the above reasons, the proposed charter school is unlikely to have a substantial adverse effect on a scenic vista or to substantially damage scenic resources, including trees, rock outcroppings, or historic buildings within a state scenic highway. The proposed charter is also have unlikely to substantially degrade the existing visual character or quality of the site and its surroundings.

The applicant proposes to grade and develop approximately 2 acres of the almost-108-acre subject parcels (the two parcels together comprise 107.49 acres). The tallest building proposed is the gym (maximum 40 feet tall) but said building will be set back approximately 325 feet from Doyle Loop Road (or about 525 feet from U.S. Highway 395, at its closest point), far away enough from the highway to not substantially interrupt the scenic background of the mountains. In addition, the adjacent church building is approximately 36.5 feet tall, so the proposed gym would not be a large departure from the surrounding landscape. Furthermore, said gym will be 80' x 100' in size, whereas the existing church on the adjacent parcel is 150' x 120' in size. In

terms of floor area then, said gym will have a smaller footprint and therefore smaller impact. The main school building will be approximately 25 feet tall and will have (an approximate) 2 in 12 roof pitch and metal siding. The existing church on the adjacent parcel also has metal siding. Said qualities are not likely to substantially impact the aesthetic quality of the project site or vicinity.

Furthermore, the proposed charter school will also have a kindergarten play area (including typical children's play equipment such as climbing structures, slides, jungle gyms, etc.), a basketball court, and grass sports field (the marking on the sports field as shown on the submitted plot plan are those of a soccer field). Some may find the above recreational facilities aesthetically pleasing. The applicant further states that all disturbed areas will either be constructed upon or landscaped; some may also consider the proposed landscaping to be aesthetically pleasing.

In addition, the applicant is proposing to relocate from an existing school location. Said existing location will remain under the control of the local school district. If left in disrepair, said location could have a negative aesthetic impact. However, if said existing location becomes a nuisance it will be subject to code enforcement action and will be required to be maintained.

Lastly, the applicant indicates that both the school buildings and parking lot will have lighting, but that all building lighting will be shielded. In addition, all proposed lighting must comply with Lassen County Code Section 18.108.155, which states:

> *Unless otherwise provided in this title, the following lighting requirements shall apply: all lighting, exterior and interior, shall be designed and located so as to confine direct lighting to the premises. A light source shall not shine upon or illuminate directly on any surface other than the area required to be lighted. No lighting shall be of the type or in a location so as to constitute a hazard to vehicular traffic, either on private property or on abutting streets.*

Given the above, the proposed charter school will not create a new source of substantial light or glare which would adversely affect day or nighttime views.

For the above reasons, the proposed charter school will have a less than significant impact to the aesthetic quality of the environment.

16. CULTURAL RESOURCES. Would the project:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☐	☒
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☐	☒

DISCUSSION:

The applicant hired Cultural Resource Specialties to prepare a cultural resource survey for the proposed charter school. John Furry of Cultural Resource Specialties prepared the *Archaeological/Historic Survey of the Long Valley Charter School Property Located in Doyle, Lassen County, California*. The survey took into account information from a records search conducted by the Northeast Information Center of the California Historical Resources Information System (Records Search I.C. File #D18-78) that included the following sources:

- National Register of Historic Places-Listed Properties and Determined Eligible Properties (1988, Computer Listings 1966 through 7-00 by National Park Service)
- The California Inventory of Historic Resources (1976)
- The California Register of Historic Resources
- California State Historical Landmarks (1996 and updates)
- California Points of Historical Interest (1992 and updates)
- Handbook of North American Indians, Vol. 8, California (1978)
- Historic Spots in California (1966)
- Directory of Properties in the Historic Property Data File for Lassen County (2006)
- NEIC archived studies within or near the project parcel

The records search showed no prehistoric or historic resources located within the project boundaries. However, according to the cultural resource survey, the project site is in an area once occupied by the Washo, Northeastern Maidu and Northern Paiute and prior to that time, "may have been occupied by Hokan speaking peoples." The examination of ethnographic and

archaeological information in the project area indicated the possibility of encountering one or more of the following types of prehistoric cultural resources:

- Occupation sites, most likely with house pits, including fire pits and midden
- Surface finds of basalt, chert, or obsidian flakes or artifacts
- Food processing stations, which would include bedrock mortars and single cups in boulders, or mobile grinding stones.

On account of the above, the project site was considered highly sensitive for cultural resources.[35] Therefore, in addition to the above records search, Cultural Resource Specialties conducted a pedestrian field survey on June 9, 2018. The entire property was surveyed with transects from 5 to 30 meters, depending on ground conditions and accessibility. Ground visibility was fair to good. Cultural Resource Specialties observed no rock outcrops or boulders on the property. During the pedestrian survey, no prehistoric or qualifying historic debris were discovered at the project site.

(a) There are no known "historical resources" at the project site as defined by CEQA (under the criteria found at Section 15064.5(a) of the 2018 CEQA Guidelines).

(b) Section 15064.5(c) of the 2018 CEQA Guidelines states that "CEQA applies to effects on archaeological sites." CEQA further distinguishes between unique and nonunique archaeological resources. As defined in Public Resources Code Section 21083.2(g), a "unique archaeological resource" is:

> *[A]n archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:*
>
> > *(1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.*
> >
> > *(2) Has a special and particular quality such as being the oldest of its type or the best available of its type.*
> >
> > *(3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.*

Any archaeological resource that does not meet the definition of a "unique archaeological resource" as defined above is considered a nonunique archaeological resource. Impacts to nonunique archaeological resources that are not historical resources are not considered significant impacts pursuant to Public Resources Code Section 21083.2(a) and Section

[35] Melany Johnson of the Susanville Indian Rancheria corroborates the sensitivity of the area surrounding the project site in her email to Associate Planner Stefano Richichi dated October 24, 2018, stating that the project site is in the Susanville Indian Rancheria's Cultural Resource Protection Zone.

15064.5(c)(4) of the 2018 CEQA Guidelines. There are no known unique or nonunique archaeological resources at the project site or any known archaeological resource that is also a historical resource as described above.

The applicant's consulting archaeologist has recommended the following general provisions as appropriate for the project, despite his negative finding of significance:

Mitigation #1
Should any evidence of prehistoric cultural resources be observed (freshwater shells, beads, bone tool remnants or an assortment of bones, soil changes including subsurface ash lens or soil darker in color than surrounding soil, lithic materials such as flakes, tools, or grinding rocks, etc.), or historic cultural resources, structures and remains with square nails, refuse deposits or bottle dumps, often associated with wells or old homesites-privies, all work should immediately cease, and a qualified archaeologist must be consulted to assess the significance of the cultural materials.

The above paragraph, although not actually *mitigation* since the baseline is that there are no historical or archaeological resources on site and therefore no impact to mitigate against, will be included as a condition of approval for the proposed charter school.

(c) There are no known impacts to any unique paleontological resources or sites or any unique geologic features.

(d) The project will result in no known impact to any human remains, including those interred outside of formal cemeteries. Sections 15064.5(e) and (f) of the 2018 CEQA Guidelines require in part that steps be taken in the event of the accidental discovery of any human remains located outside of a designated cemetery, and that provisions be taken to have any accidentally discovered historical or unique archaeological resources evaluated by a qualified archaeologist, respectively. For this reason, the applicant's consulting archaeologist has recommended the following general provisions as appropriate for the project, despite his negative finding of significance:

Mitigation #2
If human remains are discovered, all work must immediately cease, and the local coroner must be contacted. Should the remains prove to be of cultural significance, the Native American Heritage Commission in Sacramento, California, must be contacted.

The above paragraph, although not actually *mitigation* since the baseline is that there are no historical or archaeological resources on site and therefore no impact to mitigate against, will be included as a condition of approval for the proposed charter school.

17. TRIBAL CULTURAL RESOURCES.

Would the project cause a substantial adverse change in the significance of a tribal cultural resources, 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:	**Potentially Significant Impact**	**Less Than Significant With Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a) 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	☐	☐	☐	☒
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	☒

In her email to Associate Planner Stefano Richichi dated October 24, 2018, Melany Johnson, Tribal Historic Preservation Officer/NAGPRA Coordinator for the Susanville Indian Rancheria, without having seen the results of the cultural resource survey, stated that "A surface survey may not yield any physical artifacts, as the area was highly disturbed by looters." Ms. Johnson requested that she be contacted if any "cultural implements, utensils, tools or [h]uman [r]emains are unearthed" during any ground-disturbing activities. This project will be conditioned so that Ms. Johnson of the Susanville Indian Rancheria is contacted in the event of any discoveries during construction.

(a,b) No tribal cultural resources were found during the pedestrian survey. Furthermore, California Native American tribes that are traditionally and culturally affiliated with the project area received the Notice of Early Consultation for this project (and tribes that have requested consultation were also consulted with pursuant to California Assembly Bill 52 [codified at Public Resources Section 21080.3.1 et seq.]), but no tribes responded to any consultation, except for the comment received from the Susanville Indian Rancheria above. Adequate conditions will be in place to ensure that if any such resources are found during construction or operation of the proposed charter school, the

appropriate tribes will be contacted and appropriate measures will be taken. Please see Section 14 above, titled “Cultural Resources,” for more information.

18. RECREATION. Would the project:

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) 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?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

DISCUSSION:

(a,b) As discussed in section 11, titled "Public Services," Dixon Park in Doyle is approximately one quarter-mile southeast of the project site, while Doyle Park is approximately one mile southeast of the project site. The proposed charter school's proximity to Dixon Park especially could result in its increased use; however, said increased use is unlikely to cause or accelerate its substantial deterioration or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. This is especially true in light of the fact that the proposed charter school includes multiple recreational facilities for students; such facilities will not have an adverse physical effect on the environment. Therefore, there is a less than significant impact to recreational services.

19. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	**Potentially Significant Impact**	**Less Than Significant 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, forest land (as defined in Public Resources Code section 12220[g]), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104[g])?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land 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 forest land to non-forest use?	☐	☐	☒	☐

DISCUSSION:

(a) The subject parcels are not identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the California Important Farmland Finder[36] of the California Department of Conservation (part of the Farmland Mapping and Monitoring Program).

(b) The subject parcels are zoned A-1 (General Agricultural District) and A-1-H (General Agricultural District, Highway Combining District). Although the proposed project will impede agricultural use at the project site, the project site itself is only two acres in size; presumably, the remaining 105.49 acres could be put into agricultural production. Moreover, the A-1 zoning district also allows for schools by use permit and therefore the project is consistent with the A-1 district (see Section 1, titled "Land Use and Planning" for more information. Additionally, the subject parcels are not in a Williamson Act contract. Therefore, the proposed project will not conflict with the existing zoning for agricultural use.

(c, d) The subject parcel does not contain any timberland or forest land as defined by Public Resources Code Section 12220(g) or Public Resources Code Section 4526, or any timberland zoned Timberland Production as defined by Government Code Section 51104(g).

(e) The proposed project will convert some farmland to a non-agricultural use; however, impacts will be less than significant as the project site is not considered "Farmland" as described by the Farmland Mapping and Monitoring Program and the A-1 district allows for schools (See subsections "a" "b" above).

[36] California Department of Conservation. California Important Farmland Finder. Online at: https://maps.conservation.ca.gov/DLRP/CIFF/. Site visited on September 7, 2018.

20. GREENHOUSE GAS EMISSIONS.

Would the project:

	Potentially Significant Impact	Less Than Significant 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 an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

DISCUSSION:

(a) Construction of the proposed project would result in a temporary increase in greenhouse gas emissions from construction equipment. As discussed previously, however, the proposed charter school is a relocation of an existing charter school that is 1.5 miles north along U.S. Highway 395 from the proposed project site. Therefore, any increase in greenhouse gas emissions due to vehicle emissions are likely to be inconsequential.

(b) The project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Additionally, there are no thresholds of significance for the Northeast Plateau Air Basin.

Given the above considerations, the project will result in a less than significant impact to greenhouse gas emissions.

21. MANDATORY FINDINGS OF SIGNIFICANCE.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to 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, 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 that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

DISCUSSION:

(a) The project has the potential to degrade the quality of the environment; however, given the information and analysis provided in this initial study, any such degradation will have a less than significant effect.

(b) Any cumulative effect resulting from the project will be less than significant.

(c) The project will not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

ATTACHMENT 1

RECEIVED
MAY 10 2018
Lassen County Department of Planning and Building Services

USE PERMIT APPLICATION

FILING FEE: CLASS 1 $397 CLASS 2 $571 CLASS 3 $2,381
DEPARTMENT OF PLANNING AND BUILDING SERVICES
707 Nevada Street, Suite 5 · Susanville, CA 96130-3912
(530) 251-8269 · (530) 251-8373 (fax)
www.co.lassen.ca.us

n must be typed or printed clearly in black or blue ink. All sections must be completed in full.
: application consists of one page; only attach additional sheets if necessary. FILE NO. UP #2018-007

perty Owner/s		Property Owner/s	
e:	Long Valley Charter School	Name:	
ing Address:	436-965 Susan Drive	Mailing Address:	
ST, Zip:	Doyle CA 96109	City, ST, Zip:	
phone:	530-827-2395 Fax:	Telephone:	Fax:
il:	smorgan@longvalleycs.com	Email:	

licant/Authorized Representative*		Agent (Land Surveyor/Engineer/Consultant)	
e as above: [X]		Correspondence also sent to: [X]	
e:	Sherri Morgan	Name:	Nick Trover
ing Address:	436-965 Susan Drive	Mailing Address:	974 Forest Ave
ST, Zip:	Doyle CA 96109	City, ST, Zip:	Chico CA 95928
phone:	530-827-2395 Fax:	Telephone:	530-519-7132 Fax:
il:	smorgan@longvalleycs.com	Email:	nicktrover@trovercpm.com License #:

6/5/18 SR

ject Address or Specific Location: Intersection of Hwy 395 and Doyle Loop Rd

d Reference: Book: Page: Year: Doc#:

ing:		General Plan Designation:	
cel Size (acreage):	55 and 52 acres. 107 total	Section: Township:	Range:

ssor's Parcel Number(s):	141 - 050 - 95-11	141 - 050 - 94-11	- -
- -	- -	- -	- -

ject Description: Long Valley Charter School intends to develop the vacant subject site into its new school location. The new facility will be approximately 18,000 square feet with additional square footage added if th school continues to grow. The development will also include parking, student activity areas, sports field and gym. Some of the scope may be deferred as necessary due to funding restrictions.

NATURE OF PROPERTY OWNER(S): I HEREBY KNOWLEDGE THAT: I have read this application and state the information given is both true and correct to the best of my wledge. I agree to comply with all County ordinances and State laws erning this application.	*SIGNATURE OF APPLICANT/AUTHORIZED REPRESENTATIVE (Representative may sign application on bel of the property owner only if Letter of Authorization from the owner/s provided).
Sherri Morgan Date: 5/9/2018	Date:
Date:	Date:

See associated process form for required attachments and instructions.

orms\Bones\Planning\Use Permit App02/06/2012

Initial Study Application

FILING FEE: $611.00
DEPARTMENT OF PLANNING AND BUILDING SERVICES
707 Nevada Street, Suite 5 · Susanville, CA 96130-3912
(530) 251-8269 · (530) 251-8373 (fax)
www.co.lassen.ca.us

RECEIVED
MAY 10 2018
Lassen County Department of Planning and Building Services

Form must be typed or printed clearly in black or blue ink. All sections must be completed in full.
This application consists of one page; only attach additional sheets if necessary.

FILE NO. IS #2018-009

Property Owner/s		Property Owner/s	
Name:	Long Valley Charter School	Name:	
Mailing Address:	436-965 Susan Drive	Mailing Address:	
City, ST, Zip:	Doyle CA 96109	City, ST, Zip:	
Telephone:	530-827-2395 Fax:	Telephone:	Fax:
Email:	smorgan@longvalleycs.com	Email:	

Applicant/Authorized Representative*		Agent (Land Surveyor/Engineer/Consultant)	
Same as above: [X]		Correspondence also sent to: [X]	
Name:	Sherri Morgan	Name:	Nick Trover
Mailing Address:	436-965 Susan Drive	Mailing Address:	974 Forest Ave
City, ST, Zip:	Doyle CA 96109	City, ST, Zip:	Chico CA 95928
Telephone:	530-827-2395 Fax:	Telephone:	530-519-7132 Fax:
Email:	smorgan@longvalleycs.com	Email:	nicktrover@trovercpm.com License #:

5/5/18 - SP

Project Address or Specific Location:	Intersection of Hwy 395 and Doyle Loop Rd		
Deed Reference: Book:	Page:	Year:	Doc#:
Zoning:		General Plan Designation:	
Parcel Size (acreage):	55 and 52 acres. 107 total	Section:	Township: Range:

Assessor's Parcel Number(s):	141 - 050 - 95-11	141 - 050 - 94-11	- -
- -	- -	- -	- -

Project Description: Long Valley Charter School intends to develop the vacant subject site into its new school location. The new facility will be approximately 18,000 square feet with additional square footage added if the school continues to grow. The development will also include parking, student activity areas, sports field and gym. Some of the scope may be deferred as necessary due to funding restrictions.

SIGNATURE OF PROPERTY OWNER(S): I HEREBY ACKNOWLEDGE THAT: I have read this application and state that the information given is both true and correct to the best of my knowledge. I agree to comply with all County ordinances and State laws concerning this application.	*SIGNATURE OF APPLICANT/AUTHORIZED REPRESENTATIVE (Representative may sign application on behalf of the property owner only if Letter of Authorization from the owner/s is provided).
Sherri Morgan Date: 5/9/2018	Date:
Date:	Date:

PL\Forms\Bonces\Planning\Initial Study App7/30/15

ENVIRONMENTAL SETTING:

A. Describe the project site as it exists before the project, including information on size of parcel, topography, soil stability, plants and animals, and any cultural, historic or scenic aspects. Describe any existing structures on the site, and the use of the structure. Attach photographs of the site (optional).

The subject site is approximately 107 acres split between 2 parcels. It is currently vacant and is covered in natural grasses and shrubs. The site gently slopes to the north east. No cultural, historical or scenic aspects are present to the best of the owners knowledge.

B. Describe the surrounding properties, including information on plants and animals and any cultural, historical, or scenic aspects. Indicate the type and intensity of the land use (residential, commercial, agricultural, etc.). Attach photographs of the vicinity (optional).

The subject site is mostly surrounded by vacant land. There are approximately 10 houses that are either across Clark Street or Willow Ranch Creek. Additionally, there is a metal building abutting the property that is currently occupied by a church.

Slope of Property:

(Approx. percentage of property having following slopes) 100% (0-8%)
_____ (9-15%)
_____ (16-20%)
_____ (over 20%)

List all county, state, federal, or regional agencies from which a permit or approval is required:

Lassen County Environmental Health

Has any form of environmental document been prepared for the project:

Yes X If yes, attach. No _____

List districts involved:

Are there any natural or man-made drainage channels through or adjacent to the property?

(Name and/or type of drainage channels)

Are the following items applicable to the project or its effects? Discuss below all items checked 'yes' (attach additional sheets as necessary).

NOTE: Applicant may be required to submit additional data and information if deemed necessary by the Environmental Review Officer or Lead Agency.

YES	NO	
____	X	1. Change in lake, stream, or other body of water or ground water quality, or alteration of existing drainage patters.
____	X	2. Change in dust, ash, smoke, fumes, or odors in vicinity.
____	X	3. Change in existing features of any bodies of water, live or intermittent streams, hills, or substantial alteration of ground contours.

YES	NO		
____	X	4.	Substantial change in demand for public services (police, fire, water, sewage, etc.).
____	X	5.	Significant amounts of solid waste or litter.
X	____	6.	Will road or access construction involve grade alteration, cut and/or fill?
____	X	7.	Could the project create a traffic hazard or congestion on the immediate street system or cause excessive vehicular noise?
____	X	8.	Change in scenic views or vistas from existing residential areas or public lands or roads.
____	X	9.	Substantial change in existing noise or vibration levels in the vicinity.
____	X	10.	Use or disposal of potentially hazardous materials, such as toxic substances, flammables, or explosives.
____	X	11.	Change in pattern, scale, or character of land use in the general area of the project.
____	X	12.	Substantially increase energy consumption (electricity, heat, fuel, etc.).
____	X	13.	Relationship to a larger project or series of projects.
____	X	14.	Would the proposed project vary from standards or plans adopted by any agencies (such as air, water, noise, etc.)?
____	X	15.	Will the removal or logging of timber be part of the project?

Mitigation Measures proposed by the Property Owner/Applicant:

Grading will be required to execute the project. This will be permitted as required and all dust prevention measures will be followed. Although the applicant doesn't believe there will be a significant impact on traffic, it is not an impossibility. The population of the school is small and many of the current students live in the immediate vicinity of the new location. Should mitigation be required, LVCS is open to working with the County to alleviate any concerns.

RECEIVED
JUL 31 2018
Lassen County Department of Planning and Building Services

USE PERMIT PROJECT DETAIL SUPPLEMENT

DEPARTMENT OF PLANNING AND BUILDING SERVICES
707 Nevada Street, Suite 5 · Susanville, CA 96130-3912
(530) 251-8269 · (530) 251-8373 (fax)
www.co.lassen.ca.us

FILE NO._____

Form must be typed or printed clearly in black or blue ink. This supplement consists of three pages.
Please complete the following application supplement and attach to the Use Permit Application. Answer all questions that are related to the proposed use.

1. **Proposed timeframe for the project and completion of each major phase (i.e., when structures and improvements will be completed):** We expect construction to start Late 2019 or early 2020

2. **Existing use of property:** Vacant

3. **Describe adjoining land uses (e.g., residential, commercial, agricultural, etc.). Please be as specific as possible.**
   - **North:** Housing / Vacant-ag
   - **South:** Church / Housing
   - **East:** Vacant-ag
   - **West:** Housing

4. **Hours of proposed operation:** 8 **to** 3 **Days of operation:** Mon-Fri

5. **Number of shifts:** 1 **Number of employees:** 29

6. **Number of deliveries or pick-ups:** 1 ? **per day** 5 ? **per week**

7. **Number of visitors/customers:** 150 **per day** 750 **per week**

8. **Will the project increase noise levels in the immediate area?** ☐ Yes ☒ No
   If yes, anticipated noise levels in decibels at:
   50 feet_____ 100 feet_____ Property Line_____

9. **Describe existing structures and improvements to be used in conjunction with the proposed use, including their floor area:** No existing structures. New school Building proposed. Appx 96,000 SF

10. **Maximum height (in feet) of existing structures:** NA

11. **Maximum height (in feet) of proposed structures:** 25' +-

12. **Describe any existing structures to be removed:** NA

13. **Describe proposed structures and improvements (e.g., buildings, parking, roads, and sewer services, etc.). Please include dimensions and floor area:** 277'-5½" x 64'-0"
12,755 SF Metal building, asphalt parking area, Field & Play area

14. **Describe the topography and physical environment at and surrounding the project site:**
Fairly Flat, High desert, scrub & sage

15. **Describe proposed exterior lighting, including location (attach lighting diagram if applicable):**
There will be lighting in the parking lot & building lighting.
All building Lighting will be shielded

16. **Will the project include or result in grading, including anticipated grading at project buildout?**
☒ Yes ☐ No If yes, approximate total surface area to be disturbed by site grading: _____ sq. ft. or 2 acres
Quantity of cut: NA cubic yards Quantity of fill: NA cubic yards

17. **Percentage of site to be covered by impervious surfaces (e.g., roads, driveways, and structures), including estimated impervious surfaces at project buildout:** 1%

18. **Number of existing parking spaces:** 0 employee 0 customer
Number of proposed parking spaces: 83 Total employee NA customer
Describe surfacing of parking area: Asphalt
Please attach a parking plan showing existing and proposed parking facilities.

19. **Please attach a detailed plot plan, drawn to scale, showing all existing and proposed improvements.**

20. **For commercial, industrial and institutional developments, please attach a landscaping plan.**

21. **Please indicate how the following services will be provided to serve the project, including name of the service provider:**
Electricity: PSREC Underground ☐ Overhead ☑
Telephone: Pending Underground ☐ Overhead ☐
Water Supply: Existing Well ☐ New Well(s) ☑ Community Water ☐
Other ☐ _____
Sewage Disposal: Individual Septic System ☑ Community Sewer ☐ Shared Septic System ☐
If individual septic systems are proposed, has soil testing been performed to determine soil suitability? ☐ **Yes** ☑ **No** If yes, please attach

Solid Waste Disposal: Pending

LP/Natural Gas: Pending

If an extension of utility lines is necessary, indicate which services and the distance of the extension:

22. Please provide the names of the following districts, if applicable:

High School:

Elementary School:

Fire Protection:

Community Services District:

Water: N/A

Sewer: N/A

Other:

23. List all county, state, regional or federal agencies from which a permit or approval is or may be required, including type of permit required: Lassen County Planning, Building, & public works & Environmental Health. No permits expected From Fish & game and army corps

Stefano Richichi

From: nicktrover@trovercpm.com
Sent: Tuesday, July 24, 2018 1:03 PM
To: Stefano Richichi
Subject: RE: Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School
Attachments: Resolution 1718-6.pdf; UP Site 7-24-18.pdf; UP Site Overhead 7-24-18.pdf

Stefano,

Per our conversation and your letter, please see the information below and attached.

1. Authority for Application
   Please find attached the LVCS Board resolution giving Sherri Morgan the authority to sign the application.

2. Plat Plan
   Please see the revised attached site plan

3. Supporting Information
   a. The school year starts around Aug 20th and ends around May 30th
   b. The school will be single track
   c. Summer school is not offered
   d. The school operates 8:30 am to 3:00 pm and after school activities will be offered at various times and season
   e. Some students will be bussed in with one buss and one bus route
   f. Expected enrolment is 150 and up to 25 to 30 staff however not on site all at the same time
   g. The main building will house classes, offices, restrooms multipurpose room and library/resource area. The portables are approximately 900 square feet and will contain additional room for independent learning and offices.
   h. Construction will take approximately 9 months and utilize standard construction equipment such as excavators, graders, backhoes, trucks, man lifts, etc.
   i. There will be approximately 2 acres of grading. A dust control permit will be obtained if required and necessary measures implemented such as placing water on disturbed soil.
   j. All disturbed areas will either be constructed upon or landscaped.
   k. A gym is in the long term vision but not likely to be constructed at the time of the main school
   l. Typical children's play equipment such as climbing structure, slide, jungle gym etc.

Let me know if you have any more questions or need clarification on any of these items. Thanks,

Nick Trover
530-519-7132

Stefano Richichi

From: Nick Trover <nicktrover@trovercpm.com>
Sent: Tuesday, August 21, 2018 3:11 PM
To: Stefano Richichi
Subject: Re: Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School

Thanks Stefano,

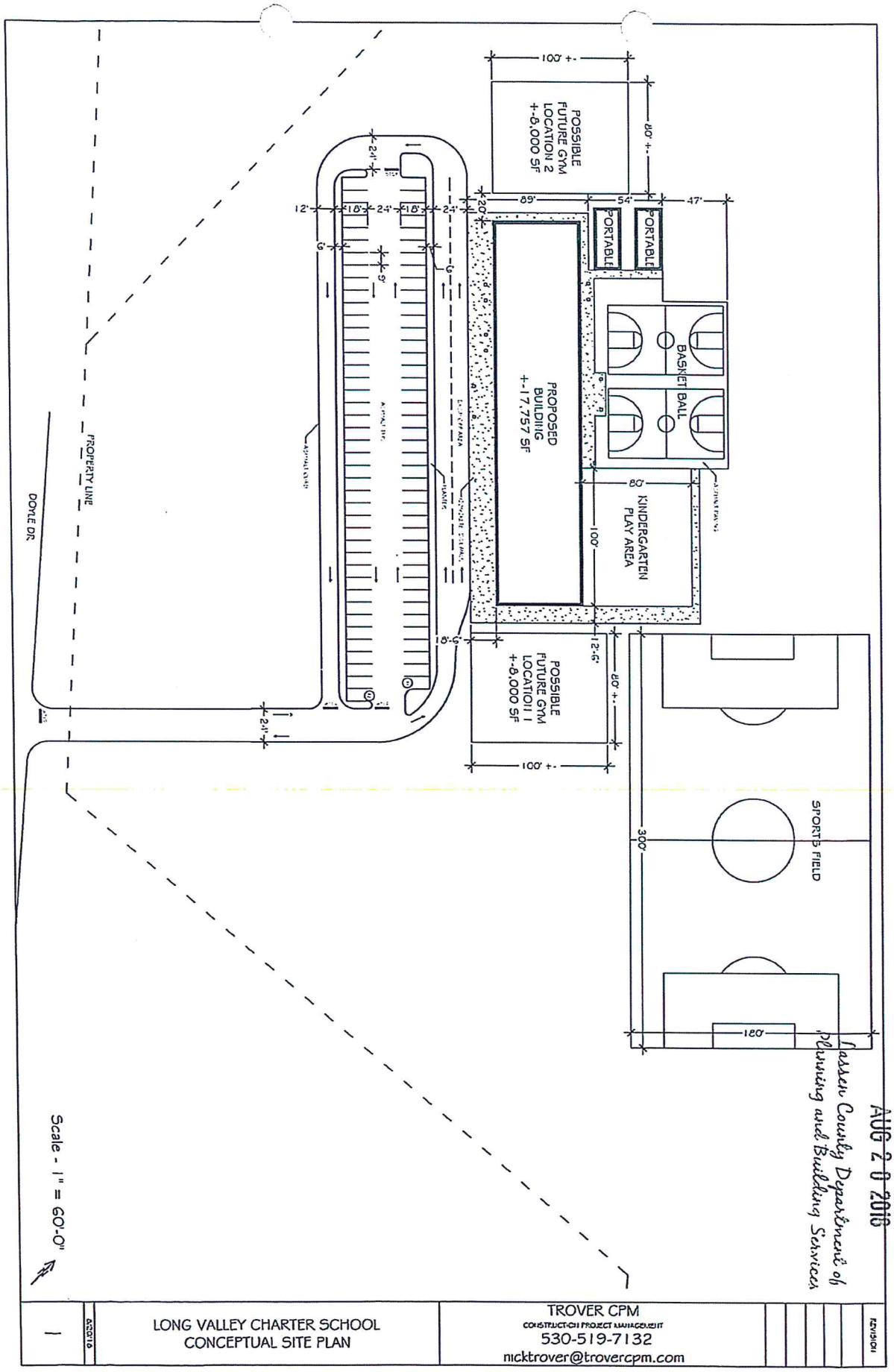
If there is no down side, I'd keep both APs just incase something changes. If there is a downside, we can remove it. For the height, let's do 40' if it's going to be a maximum. I can't imagine we'd be that tall but I'd rather be safe. Thanks!

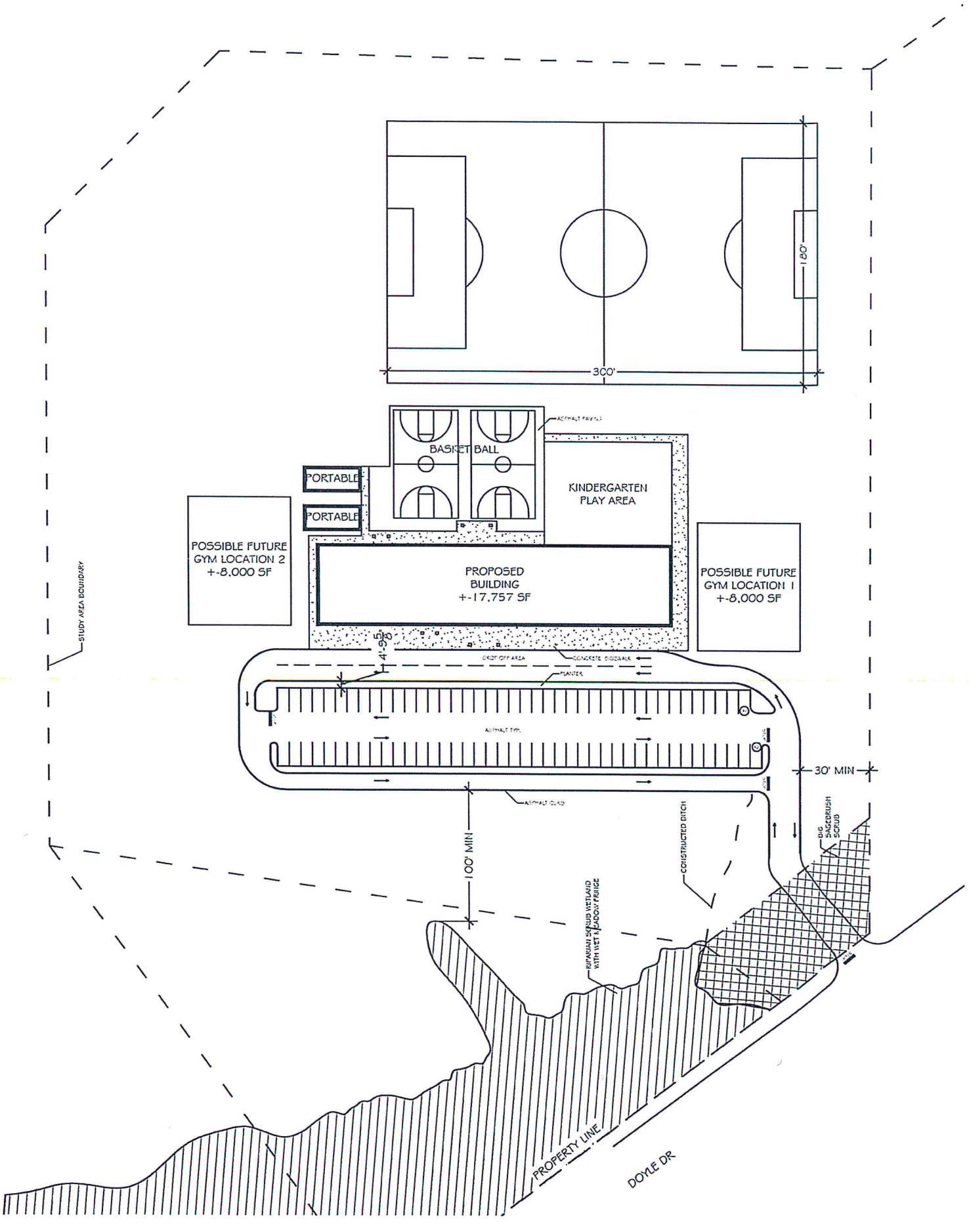
Nick.

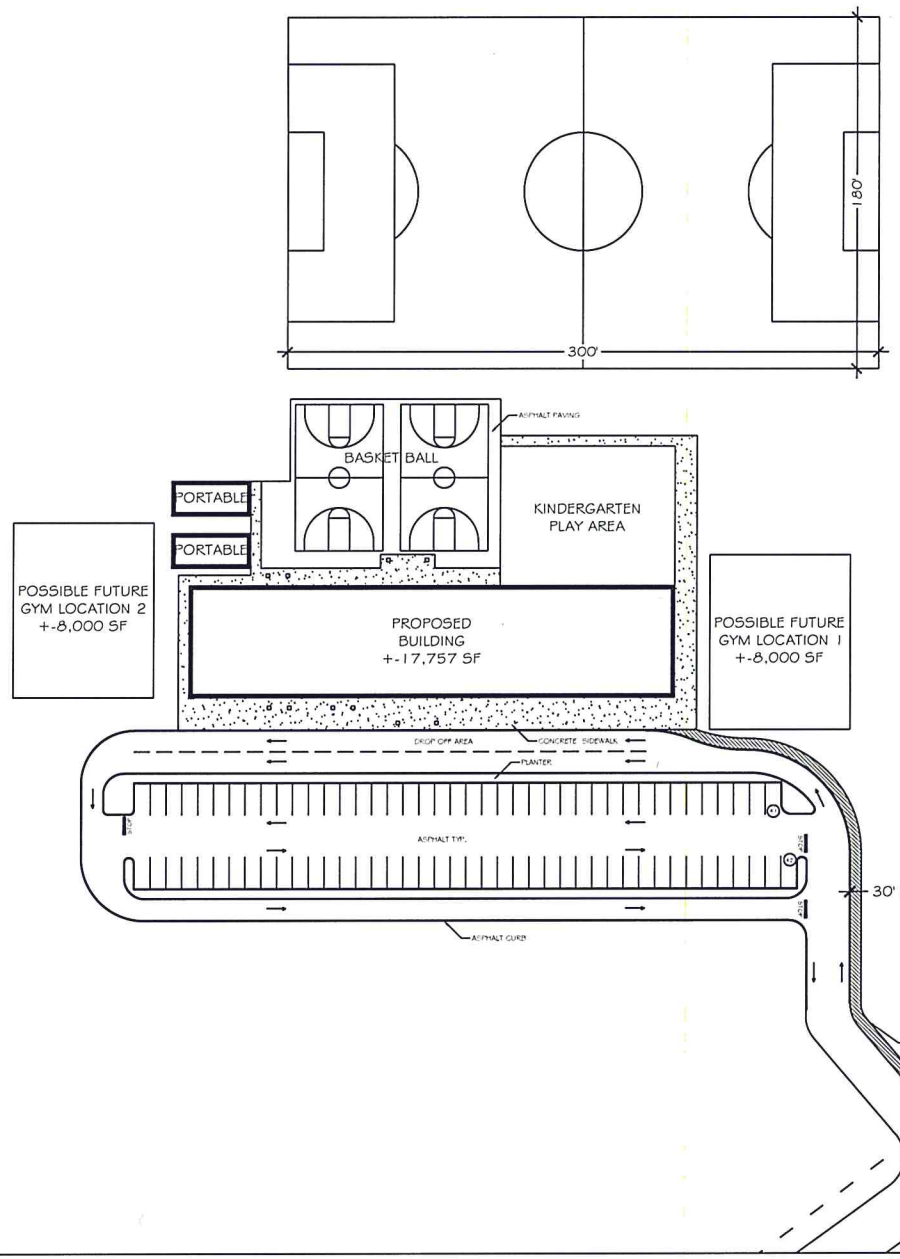
Sent from my iPhone

> On Aug 21, 2018, at 2:36 PM, Stefano Richichi <SRichichi@co.lassen.ca.us> wrote:
>
> Hi Nick,
>
> Thank you for the information regarding the proposed gym. I would give a maximum height for the gym, so if you don't think the gym will be over 30 feet, then that's what we'll use for the project. It does look to me like all proposed improvements are on APN 141-050-95, including the gym. Would you like to remove APN 141-050-94 from the application? I will need more information in order to prepare and complete the initial study, but once I receive your response to the question above, I'll be able to accept the application as complete and begin the environmental review process.
>
> Best regards,
>
> Stefano M. Richichi
> Associate Planner
> Lassen County Planning & Building Services
> 707 Nevada St, Suite 5
> Susanville CA 96130
> (530) 251-8269
> (530) 251-8373 (FAX)
>
>
> -----Original Message-----
> From: nicktrover@trovercpm.com <nicktrover@trovercpm.com>
> Sent: Monday, August 20, 2018 10:45 AM
> To: Stefano Richichi <SRichichi@co.lassen.ca.us>
> Subject: RE: Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School
>
> Morning Stefano,
>
> Please see the revised site plan. Is this adequate for the possible gym?
> Also, the height would be in the range of 30'+-. Is there any more info you need? Thanks,
>
>

ATTACHMENT 2




300'
180'
BASKET BALL
PORTABLE
PORTABLE
KINDERGARTEN
PLAY AREA
POSSIBLE FUTURE
GYM LOCATION 2
+-8,000 SF
PROPOSED
BUILDING
+-17,757 SF
POSSIBLE FUTURE
GYM LOCATION 1
+-8,000 SF
STUDY AREA BOUNDARY
41'-5"
30' MIN
100' MIN
CONSTRUCTED DITCH
PROPERTY LINE
DOYLE DR



Scale - 1" = 60'-0"

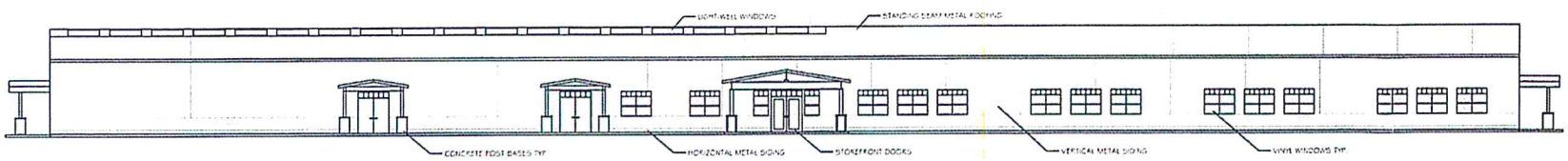
REVISION

TROVER CPM
CONSTRUCTION PROJECT MANAGEMENT
530-519-7132
nicktrover@trovercpm.com

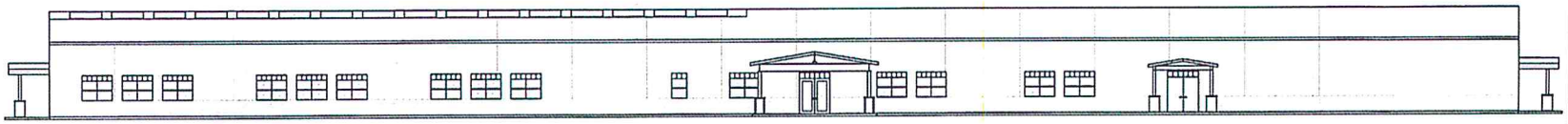
LONG VALLEY CHARTER SCHOOL
CONCEPTUAL SITE PLAN W/ BIKE LANE

4/26/19

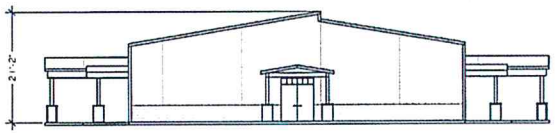
1



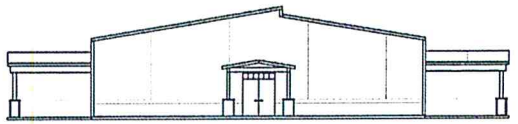
SOUTH WEST



NORTH EAST

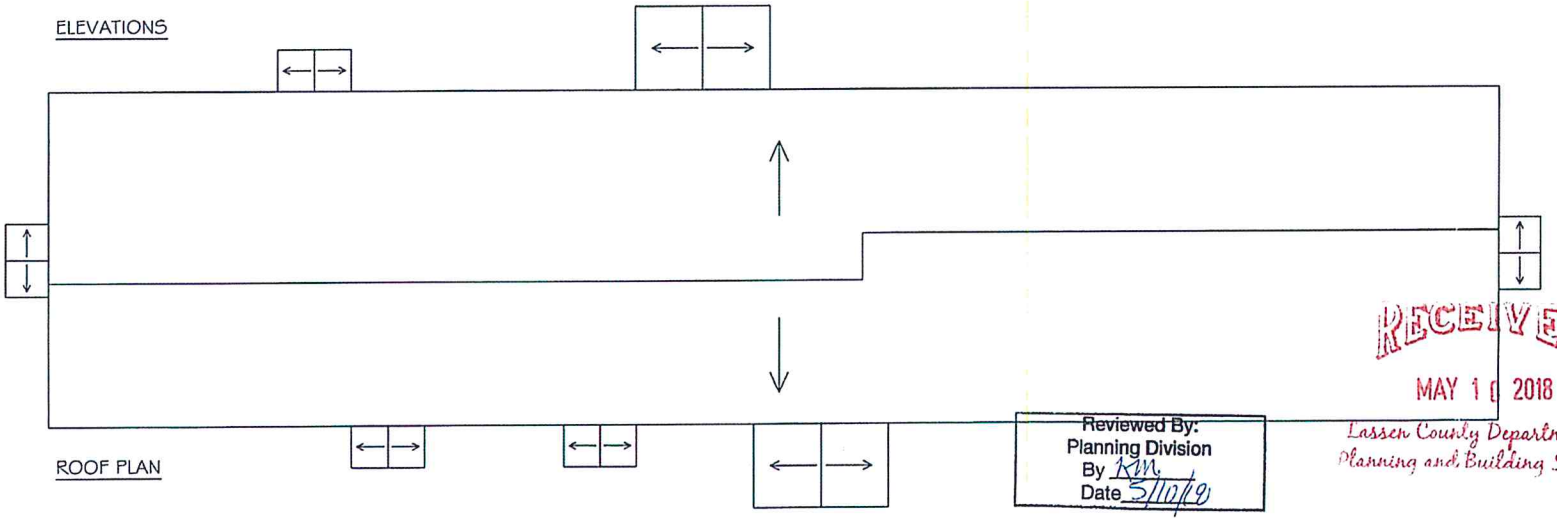


NORTH WEST



SOUTH EAST

ELEVATIONS



ROOF PLAN

Reviewed By:
Planning Division
By KM
Date 5/10/18

RECEIVED
MAY 10 2018
Lassen County Department of
Planning and Building Services

REVISION

TROVER CPM
CONSTRUCTION PROJECT MANAGEMENT
530-519-7132
nicktrover@troverpm.com

LONG VALLEY CHARTER SCHOOL
CONCEPTUAL ELEVATIONS & ROOF PLAN

5/9/18

3

County of Lassen
Department of Planning and Building Services
• Planning • Building Permits • Code Enforcement • Surveyor • Surface Mining

Maurice L. Anderson, *Director*
707 Nevada Street, Suite 5
Susanville, CA 96130-3912
Phone: 530 251-8269
Fax: 530 251-8373
email: landuse@co.lassen.ca.us
website: www.co.lassen.ca.us

Zoning & Building
Inspection Requests
Phone: 530 257-5263

August 24, 2018

NOTICE OF EARLY CONSULTATION

Applicant/Owner: Long Valley Charter School

File No.: Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School

Project: Proposal to construct a charter school, which comprises an approximately 17,757-square-foot main building (for classrooms, offices, a multipurpose room, and a library/resource area), an 8,000-square-foot gym, two 900-square-foot portable buildings (for additional offices and independent learning), a 54,000-square-foot sports field, two basketball courts, a kindergarten play area, and the related parking lot. The subject parcels are zoned A-1 (General Agricultural District) and A-1-H (General Agricultural District, Highway Combining District) and have an "Extensive Agriculture" land use designation in the *Lassen County General Plan, 2000.*

Location: The project site is located approximately one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Road and U.S. Highway 395. The project site does not have an assigned address. All development is currently proposed at APN 141-050-95.

A.P.N.: 141-050-95, 141-050-94

Staff Contact: Stefano Richichi, Associate Planner

The project described above is being referred to your agency for early consultation to obtain comments concerning potentially significant impacts which could result from project approval and development. The information provided by your agency will assist Lassen County in determining whether a Negative Declaration or Environmental Impact Report should be prepared as the appropriate environmental document for the project.

Attached with this letter are the use permit application, the initial study application, the use permit project detail supplement, emails with supplemental information, elevations, a plot plan, and a vicinity map depicting the location of the project. Graphics and other supporting material are available through this Department upon request.

Comments submitted by your agency should focus on the potentially significant project-related impacts that are within your agency's jurisdiction and area of expertise. In addition to commenting on the significance of potential impacts, you are encouraged to suggest any known mitigation measures

which would reduce such impacts to a less than significant level. You are also encouraged to make recommendations regarding any additional studies or other information that may be needed to accurately determine the significance of project impacts and/or appropriate mitigation measures.

In order to be considered prior to determining whether a Negative Declaration or Environmental Impact Report is required for this project, your comments will need to be received by this office no later than Friday, September 14, 2018.

If you have any questions concerning the project, please contact Stefano Richichi, Associate Planner, at (530) 251-8269.

Sincerely,

Maurice L. Anderson,
Environmental Review Officer

MLA:smr
Enclosures:

- Use Permit Application #2018-007
- Initial Study Application #2018-009
- Use Permit Project Detail Supplement
- Emails with Supplemental Information
- Elevations
- Plot Plan
- Vicinity Map

Distribution: Supervisor Hammond (5); Long Valley Charter School (Property Owner); Sherri Morgan (Applicant); Nick Trover (Agent); Co. Assessor's Office; Co. Building Official; Co. Fire Warden/CAL FIRE; Co. Environmental Health Dept.; Co. Public Works; Co. Public Works/Road Div.; Co. Public Works/Transportation; Sheriff; Lahontan RWQCB (email); Dept. of Water Resources (DWR); Dept. of Fish & Wildlife: (Redding/Wendel); Caltrans, District 2; State Clearinghouse (15 Copies); Pit River Tribe of California; Greenville Rancheria of Maidu Indians; Susanville Indian Rancheria; Honey Lake Maidu; Washoe Tribe of Nevada and California; Doyle Fire Protection District; Co. Air Pollution Control Officer; Fort Sage Unified School District; Lassen Community College District; Long Valley School District; Plumas-Sierra REC; Union Pacific Railroad; Division of State Architect.

S:/PLA:/Planning/2018/UP #2018-007, Long Valley Charter School/Initial Study/Notice of Early Consultation

ATTACHMENT 4

STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Request for Early Consultation

August 29, 2018

To: Reviewing Agencies

Re: Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School
SCH# 2018082064

Prior to determining whether a Negative Declaration or an Environmental Impact Report (EIR) is required for a project under CEQA, a Lead Agency is required to consult with all responsible and trustee agencies. This notice and attachment fulfill the early consultation requirement. Recommendations on the appropriate type of environmental document for this project, as well as comments on its scope and content, should be transmitted to the Lead Agency at the address below. You do not have to be a responsible or trustee agency to comment on the project. All agencies are encouraged to comment in a manner that will assist the Lead Agency to prepare a complete and adequate environmental document.

Please direct your comments to:

Stefano Richichi
Lassen County
707 Nevada Street, Suite 5
Susanville, CA 96130

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to SCH Number 2018082064 in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

RECEIVED
SEP 04 2018
Lassen County Department of Planning and Building Services

Attachment
cc: Lead Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
1-916-322-2318 FAX 1-916-558-3184 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2018082064
Project Title Use Permit #2018-007, Initial Study #2018-009, Long Valley Charter School
Lead Agency Lassen County

Type CON Early Consultation

Description Proposal to construct a charter school, which comprises an approx 17,757-sf main building (for classrooms, offices, a multipurpose room, and a library/resource area), an 8,000 sf gym, two 900-sf portable buildings (for additional offices and independent learning), a 54,000-sf sports field, two basketball courts, a kindergarten play area, and the related parking lot. The project site is located approx one quarter mile north of the Town of Doyle at the intersection of Doyle Loop Rd and U.S. Hwy 395. The project site does not have an assigned address. All development is currently proposed at APN 141-050-95.

Lead Agency Contact

Name Stefano Richichi
Agency Lassen County
Phone (530) 251-8269 **Fax**
email
Address 707 Nevada Street, Suite 5
City Susanville **State** CA **Zip** 96130

Project Location

County Lassen
City
Region
Cross Streets Doyle Loop Rd and Hwy 395
Lat / Long 40° 1' 55.6" N / 120° 6' 24.7" W
Parcel No. 141-050-95 and 94
Township 25N **Range** 17E **Section** 7,8 **Base** MDB&M

Proximity to:

Highways Hwy 395
Airports
Railways Western Pacific Railroad
Waterways Long Valley Creek
Schools
Land Use A-1, A-1-H; Extensive ag

Project Issues

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 1; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 2; California Department of Education; Department of Housing and Community Development; State Water Resources Control Board, Division of Drinking Water, District 2; Regional Water Quality Control Bd., Region 6 (So Lake Tahoe); Department of Toxic Substances Control; Public Utilities Commission; Native American Heritage Commission

Date Received 08/29/2018 **Start of Review** 08/29/2018 **End of Review** 09/14/2018

Note: Blanks in data fields result from insufficient information provided by lead agency

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Region 1 – Northern
601 Locust Street
Redding, CA 96001
www.wildlife.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

RECEIVED
SEP 12 2018
Lassen County Department of
Planning and Building Services
received by email 9/12/18 -JR

September 12, 2018

Stefano Richichi, Associate Planner
County of Lassen
Department of Planning and Building Services
707 Nevada Street, Suite 5
Susanville, CA 96130

Subject: Review of the Early Consultation-Use Permit #2018-007 and Initial Study #2018-009 for the Long Valley Charter School, State Clearinghouse Number 2018082064, Near the Community of Doyle, Assessor's Parcel Number 141-050-94 and -95, Lassen County

Dear Mr. Richichi:

The California Department of Fish and Wildlife (Department) has reviewed the early consultation application dated August 24, 2018, for the above-referenced project (Project). As a trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants and their habitat. As a responsible agency, the Department administers the California Endangered Species Act and other provisions of the Fish and Game Code (FGC) that conserve the State's fish and wildlife public trust resources. The Department offers the following comments and recommendations on this Project in our role as a trustee and responsible agency pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code §21000 et seq. The following are informal comments intended to assist the Lead Agency in making informed decisions early in the Project development and review process.

Project Description

The Project as proposed is to "*construct a charter school, which comprises an approximately 17,757-square-foot main building (for classrooms, offices, a multipurpose room, and a library/resource area), an 8,000-square-foot gym, two 900-square-foot portable buildings (for additional offices and independent learning), a 54,000-square-foot sports filed, two basketball courts, a kindergarten play area, and the related parking lot.*." The Project is located on two parcels totaling 107 acres. Parcel 1 is 55 acres and Parcel 2 is 52 acres respectively.

Comments and Recommendations

The Department has the following comments and recommendations as they pertain to biological resources on the Project site.

Wetlands, Drainages and other Water Features

The northern parcel contains sections of two drainages: Long Valley Creek and Willow Ranch Creek. In addition to those creeks, another water feature is present, which begins at Long Valley Creek and traverses southwest to the middle of the upper parcel. This water feature appears to have wetland characteristics per aerial imagery. In order to analyze the potential impacts of the Project on these water features, the Department recommends a wetland delineation be conducted to map the water features and any riparian vegetation present. The wetland delineation should be conducted by a qualified biologist at the appropriate time of year.

Biological Resources

A query of the California Natural Diversity Database (CNDDB) identified a number of special-status wildlife and botanical species including, but not limited to, the following:

Plants:

- Schoolcraft's wild buckwheat (*Eriogonum microthecum* var. *schoolcraftii*)(California Rare Plant Rank 1B.2)
- Lance-leaved scurf-pea (*Ladeania lanceolata*)(California Rare Plant Rank 2B.3)
- Plummer's clover (*Trifolium gymnocarpon* ssp. *plummerae*)(California Rare Plant Rank 2B.3)
- Western seablite (*Suaeda occidentalis*)(California Rare Plant Rank 2B.3)

Wildlife:

- Swainson's hawk (*Buteo swainsoni*)(State-listed Threatened)

The Department recommends a qualified biologist conduct a general, and if warranted, focused biological survey at the appropriate time of the year on the Project site. If special-status species are observed onsite, avoidance and minimization measures shall be developed to lessen the impact to less than significant. For botanical surveys, the Department recommends using the March 2018 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities*. Protocols for surveying for Swainson's hawk can be found at https://wildlife.ca.gov/Conservation/Birds/Swainson-Hawks.

Lighting

The Department recognizes the effects that artificial lighting has on birds and other nocturnal species. The effects are numerous and include impacts to singing and foraging behavior, reproductive behavior, navigation, and altered migration patterns. To minimize adverse effects of artificial light on wildlife, the Department recommends that lighting fixtures associated with the Project be downward facing, fully-shielded and designed and installed to minimize photo-pollution.

Low Impact Development

A discussion on Low Impact Development (LID) methods to be used on the Project to preserve natural resources, and protect and improve water quality and availability should be included in the forthcoming environmental document.

Lake and Streambed Alteration Notification

The project may require notification to the Department pursuant to 1600 et seq. of the FGC prior to the applicant's commencement of any activity that will substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank (which may include associated riparian resources) of a river, stream or lake, or use material from a streambed. The Department's issuance of a Lake or Streambed Alteration Agreement for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (Lead Agency) Negative Declaration or Environmental Impact Report for the Project. To minimize additional requirements by the Department pursuant to Section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. A Streambed Alteration Agreement notification package may be obtained through the Department's website at https://www.wildlife.ca.gov/Conservation/LSA.

All biological studies, as well as detailed building plans, should be submitted with the forthcoming environmental document. If you have any questions, please contact Amy Henderson, Environmental Scientist, at (530) 225-2779, or by email at Amy.Henderson@wildlife.ca.gov.

Sincerely,

Adam McKannay
Senior Environmental Scientist - Supervisor
Interior Cannabis and LSA Permitting

ec: State Clearinghouse
state.clearinghouse@opr.ca.gov

Amy Henderson
California Department of Fish and Wildlife
Amy.Henderson@wildlife.ca.gov

Liz van Diepen
North Basin Regulatory Unit
Lahontan Regional Water Quality Control Board
elizabeth.vandiepen@waterboards.ca.gov

BUILDING AMERICA

September 11 2018

VIA EMAIL ONLY: landuse@co.lassen.ca.us

Maurice L. Anderson, Director
County of Lassen
Dept of Planning & Building Services
707 Nevada Street, #5
Susanville, CA 96130-3912

Re: Comments to Long Valley Charter School project at land generally located at the intersection of Doyle Loop Road and U.S. Highway 395 (the "Project")

Dear Mr. Anderson:

Thank you for allowing Union Pacific Railroad Company ("UP") the opportunity to submit the following comments regarding the above-referenced Project. UP is a Delaware corporation that owns and operates a common carrier railroad network in the western half of the United States, including the State of California. UP's rail network is vital to the economic health of California and the nation as a whole and its rail service to customers in the County of Lassen is crucial to the future success and growth of those customers.

The proposed Project location is adjacent to UP's property and railroad operations. Any land planning decisions should consider that train volumes near the Project area may increase in the future. UP also asks that the City and the applicant keep in mind that this is an active rail corridor and nearby land uses should be compatible with this continuing rail use.

Trespassing

Approval of this Project will likely increase pedestrian traffic and trespassing onto the railroad right-of-way. UP strongly recommends that the developer and the City evaluate such impacts and set forth appropriate mitigation measures. If the Project is approved, we request that the City require the Project developer to install vandal resistant fencing at least 8 feet or taller (without impairing visibility), pavement markings and "no trespassing" signs designed to prevent individuals from trespassing onto the railroad tracks. All pedestrians and cyclists should be directed to use designated pedestrian rail crossings by utilizing appropriate signage and paths. Buffers and setbacks should also be required adjacent to the right-of-way.

Increased Traffic Impact

Rail crossing safety is critical to the public and to UP. Any increase in traffic from the Project may render inadequate the current safety devices in place on the nearby at-grade crossings. Additionally, an increase of pedestrian and vehicular traffic may conflict with train operations causing trains to proceed more slowly through the City, and/or make more frequent emergency stops, which would make rail service less effective and efficient. Should this Project be approved, the Project developer and the City

UNION PACIFIC RAILROAD
1400 Douglas Street
Omaha, Nebraska 68179

should examine any increase in vehicular and pedestrian traffic and the impacts on the nearby at-grade road crossings to see what additional mitigation measures should be included in the Project.

Noise and Vibration Impact

UP's 24-hour rail operations generate the noise and vibration one would expect from an active railway. Any increase in pedestrian and vehicular traffic over and around at-grade crossings may result in additional horn use by railroad employees. As a mitigation measure, the developer should disclose to the general public, including residents of the proposed development, the daytime and nighttime noise levels naturally occurring with rail service, including sounding horns at vehicle crossings where required, as well as the pre-existing and predictably-occurring vibration. These disclosures should note that train volume may increase in the future. The Project's development plans should also include appropriate mitigation measures, such as construction of sound barrier walls or landscape buffers, and/or use of sound-proofing materials and techniques.

Drainage and Project Construction

UP requests the City ensure that the drainage plan relating to the Project does not shift storm water drainage toward UP property and infrastructure. Any runoff onto UP's property may cause damage to its facilities resulting in a potential public safety issue. If the Project is approved, we ask that the City require the applicant to mitigate all safety risks and the impacts of the railroad's 24-hour operations during the construction of the Project, including contacting UP to arrange for flaggers for work performed within twenty-five feet (25') of the nearest track.

UP appreciates the developer and the City giving due consideration to the above concerns, as this proposed Project may result in impacts to land use and public safety. Please give notice to UP of all future hearings and other matters with respect to the Project as follows:

Adam S. Tietz – Sr. Real Estate Analyst
Union Pacific Railroad Company
1400 Douglas Street - STOP 1690 Omaha, NE 68179
(402) 544-8805
astietz@up.com

Please do not hesitate to contact Adam S. Tietz if you have any questions or concerns.

Sincerely,

MERoebke

Madeline E. Roebke
Senior General Counsel
Union Pacific Railroad Company

cc: Francisco Castillo

State of California—Transportation Agency EDMUND G. BROWN Jr., Governor

DEPARTMENT OF CALIFORNIA HIGHWAY PATROL
Susanville Area
472-400 Diamond Crest Road
Susanville, CA 96130-5001
Office: 530-252-1800
Fax: 530-257-4223
(800) 735-2929 (TT/TDD)
(800) 735-2922 (Voice)

September 17, 2018

File No.: 140.16735.16735

Stefano Richichi
Lassen County
707 Nevada Street, Suite 5
Susanville, CA 96130

Dear Mr. Richichi:

The Susanville Area Office of the California Highway Patrol received the "Notice of Completion" of the Environmental document for the proposed Charter school located on the north Doyle Loop at US Highway 395, State Clearinghouse (SCH) project number #2018082064. After our review, we have concerns with the potential impact this project could have on traffic congestion.

US Highway 395 at this location is a two lane, north/south designated highway in rural Lassen County. There is a maximum posted speed limit of 55 MPH and is divided by double yellow lines. The north Doyle Loop intersection is only controlled by a stop sign on Doyle Loop. During morning and afternoon commute hours, this location sees a high volume of traffic traveling between Nevada and the three prisons located north of the community of Doyle. Also, US 395 is an arterial highway for commercial vehicle traveling north from Nevada into Oregon.

The possible increased volume of traffic at the specific intersection has a potential to increase traffic congestion and collisions. School buses and parents picking up and dropping off children would be attempting to enter traffic on US 395 or cross the highway during heavily traveled hours of the day, particularly in the mornings. This project may necessitate the need for additional traffic control measures to mitigate the potential increase in traffic collisions.

If you have any questions or concerns regarding this letter, please contact me or Sergeant Linda Powell at (530) 252-1800.

Sincerely,

S. RICHARDS, Captain
Commander

Cc: State Clearinghouse
Northern Division
Special Projects Section

Stefano Richichi

From: Gonzalez, Marcelino@DOT <marcelino.gonzalez@dot.ca.gov>
Sent: Thursday, September 20, 2018 9:46 AM
To: Stefano Richichi
Subject: Las-395-24.49 Initial Study #2018-009, Long Valley Charter School - Comments

The proposed school site is not contiguous to US-395 nor it does not appear likely that there will be a school crossing outside the school zone. Therefore, I do not see a need for school signs on US-395. If a large percentage of the parents/students are coming from the south, a right turn lane is recommended. That move from NB-395 on Doyle Drive is basically a 130 degree turn which means cars and buses will need to go slower to negotiate the turn.

Lastly, there is existing utility lighting for the Doyle Drive intersection. The County should consider having the school contribute towards a future project to upgrade the intersection lighting.

Thanks.

Rob Stinger, P.E.
Chief - Traffic Engineering & Operations
Caltrans District 2
530-225-3229

From: Gonzalez, Marcelino@DOT
Sent: Wednesday, September 19, 2018 12:52 PM
To: Stinger Jr, Rob F@DOT <rob.stinger@dot.ca.gov>; Chaffin, Fred N@DOT <fred.chaffin@dot.ca.gov>
Cc: Arseneau, Troy A@DOT <troy.arseneau@dot.ca.gov>; Rich, Tamara J@DOT <tamara.j.rich@dot.ca.gov>; Grah, Kathy M@DOT <kathy.grah@dot.ca.gov>
Subject: Las-395-24.49 Initial Study #2018-009, Long Valley Charter School - Comments requested

Lassen County is reviewing a proposal to construct a new school using Doyle Loop. 150 students, few by bus. Intersection has LTL and accel lane. No right turn lane.

CHP is concerned based on mainline traffic. Add school signs if built?

Comments, concerns, suggestions

South: Church / Housing
East: Vacant-ag
West: Housing.

4. **Hours of proposed operation:** 8 to 3 **Days of operation:** Mon-Fri
5. **Number of shifts:** 1 **Number of employees:** 25
6. **Number of deliveries or pick-ups:** 1 ? per day 5 ? per week
7. **Number of visitors/customers:** 150 per day 750 per week

3. Supporting Information

a. The school year starts around Aug 20th and ends around May 30th

b. The school will be single track

c. Summer school is not offered

d. The school operates 8:30 am to 3:00 pm and after school activities will be offered at various times and season

e. Some students will be bussed in with one buss and one bus route

f. Expected enrolment is 150 and up to 25 to 30 staff however not on site all at the same time

2016 Traffic Volumes (for ALL vehicles on CA State Highways)

2016 Volumes Home View

Return to Census Program or Jump to 2011 | 2012 | 2013 | 2014 | 2015 | 2016

Dist	Rte	CO	Post Mile	Description	Back Peak Hour	Back Peak Month	Back AADT	Ahead Peak Hour	Ahead Peak Month	
02	395	LAS	R 4.615	JCT. RTE. 70 WEST	1150	11800	9400	730	7000	59
02	395	LAS	29.84	GARNIER ROAD	820	7800	6700	690	6000	49
02	395	LAS	51.87	STANDISH ROAD	670	7300	5800	710	7700	60
02	395	LAS	55.18	JANESVILLE ROAD	750	8000	5800	740	8900	76
02	395	LAS	R 61.094	JCT. RTE. 36 WEST	900	9300	8200	420	4100	37
02	395	LAS	70.12	STANDISH, COUNTY ROAD A 3	210	1950	880	180	1750	15
02	395	LAS	72.943	LITCHFIELD, COUNTY ROAD A-27	180	1750	1500	160	1350	11
02	395	LAS	R 76.927	WENDEL ROAD	160	1450	1150	140	1200	99
02	395	LAS	108.455	RAVENDALE	150	1550	910	150	1550	90
02	395	LAS	129.195	MADELINE, ASH VALLEY ROAD	150	1500	860	140	1450	85
02	395	LAS	138.979	LASSEN/MODOC COUNTY LINE	130	1300	850			

From: Stefano Richichi [mailto:SRichichi@co.lassen.ca.us]
Sent: Wednesday, September 19, 2018 11:18 AM
To: Gonzalez, Marcelino@DOT <marcelino.gonzalez@dot.ca.gov>
Subject: Comments re: Initial Study #2018-009, Long Valley Charter School

Hello Marci,

I'm contacting you because our Department received a letter from the Department of California Highway Patrol (CHP, attached) in which CHP describes its concerns regarding "potential... increase[d] traffic congestion and collisions..." related to the Long Valley Charter School applications we are processing (please see the attached Notice of Early Consultation to see the project's information). CHP goes on to say that this project "may necessitate the need for additional traffic control measures to mitigate the potential increase in traffic collisions."

Can you tell me whether Caltrans shares CHP's concerns, and if so, how the applicant might mitigate the project's potential impacts to transportation and traffic? We didn't hear from Caltrans in response to the Notice of Early Consultation we sent out on August 24th, but wanted to get your thoughts now that we have received traffic-related comments.

Thank you,

Stefano M. Richichi
Associate Planner
Lassen County Planning & Building Services
707 Nevada St, Suite 5
Susanville CA 96130
(530) 251-8269
(530) 251-8373 (FAX)

ATTACHMENT 9

BIOLOGICAL STUDY REPORT

Long Valley Charter School Doyle Project

Doyle, Lassen County, California

Prepared for:

Long Valley Charter School

Prepared by:

Donald Burk, Qualified Biologist

August 2018

629-01

ENPLAN
3179 Bechelli Lane, Suite 100, Redding, CA 96002
(530) 221-0440
www.enplan.com

TABLE OF CONTENTS

TABLES

APPENDICES

INTRODUCTION

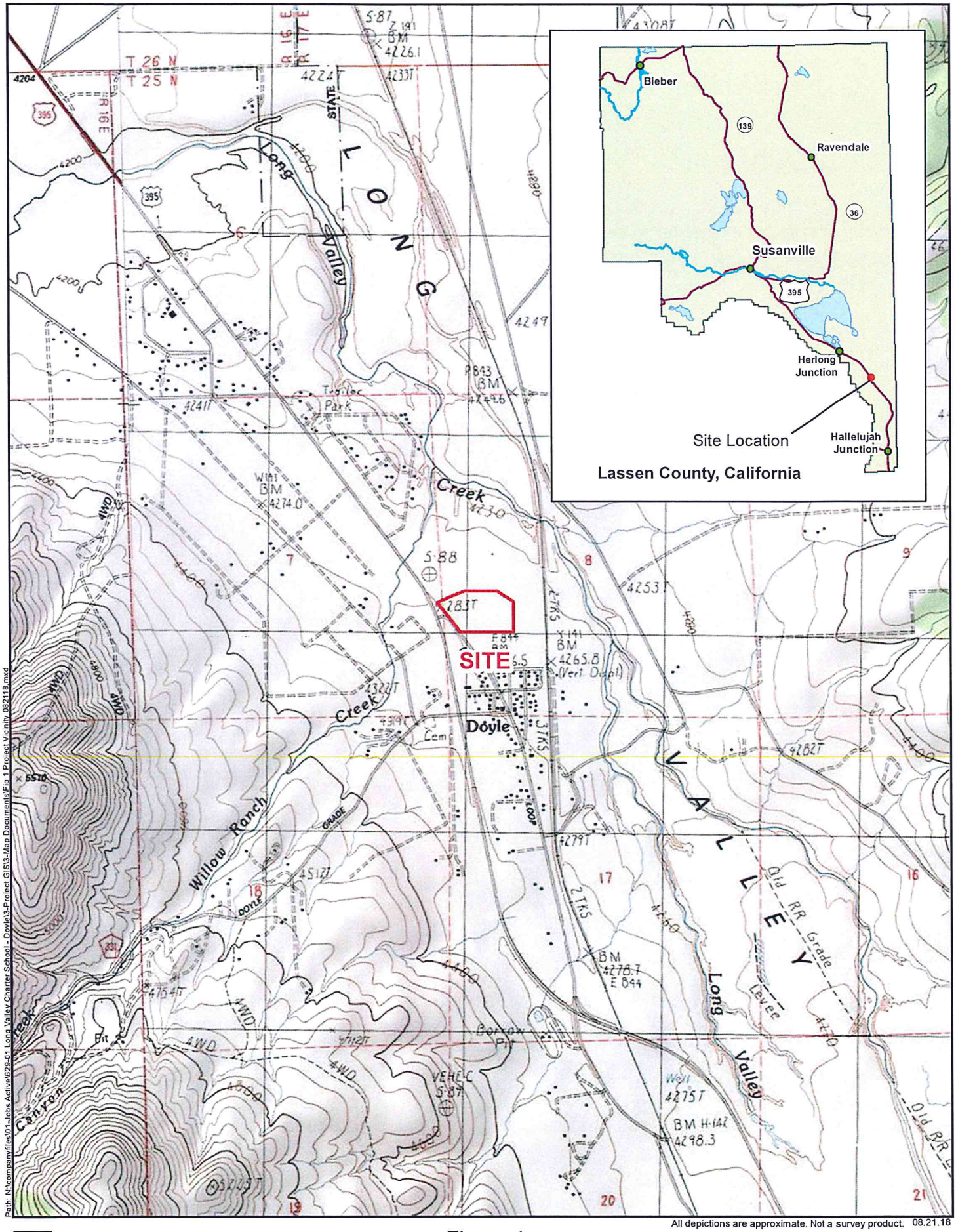
This biological study report addresses a ±16.1-acre site in the community of Doyle, which is proposed as the future location of the Long Valley Charter School. The purpose of this report is to identify and characterize sensitive biological resources likely to occur on the project site. The information provided is intended to assist in the preparation of subsequent environmental documentation and/or issuance of regulatory agency permits for the proposed project.

ENPLAN is an environmental consulting firm with over 35 years of experience with projects throughout northern California. All work associated with this project was performed by Donald Burk, Environmental Services Manager with ENPLAN. A resume for Mr. Burk is provided in **Appendix A**.

Mr. Burk received his Masters of Science degree in Botany, and Bachelor of Arts degree in Chemistry and Biological Sciences from California State University, Chico. Having worked in the environmental consulting field since 1981, he has an in-depth background in a broad spectrum of environmental studies. His experience includes managing the preparation of CEQA/NEPA environmental compliance documents, environmental site assessments, wildlife and botanical studies, wetland delineations, reclamation plans, and stream restoration projects. Mr. Burk was responsible for final report review.

PROJECT LOCATION

The proposed project is located in the community of Doyle, Lassen County. As shown in **Figure 1**, the study site is immediately east of the intersection of US Highway 395 and Doyle Drive (County Road 361), in Township 25 North, Range 17 East, Section 8, of the U.S. Geological Survey's (USGS) Doyle, 7.5-minute quadrangle (USGS, 1957). The ±16.1-acre study site is a portion of Lassen County Assessor's Parcel Numbers 141-050-95-11 and 141-050-96-11 and adjoining road right-of-way.



All depictions are approximate. Not a survey product. 08.21.18

0 2,000 Feet

Figure 1

Project Vicinity

ENPLAN

PROJECT DESCRIPTION

The Long Valley Charter School is proposing to construct a ±10-acre school facility on a portion of Lassen County Assessor's Parcels 141-050-95-11 and 141-050-95-11. The objective of the current study was to identify a ±10-acre development site within the larger parcels that is free of biological/wetland constraints. For the purposes of this report, the "study area" consists of a broader area that includes a riparian scrub/wet meadow wetland, while the smaller "project site" excludes the wetland community (**Figure 2**).

The proposed school will include classrooms, portable buildings, a kindergarten play area, basketball courts, a soccer/sports field, parking, and appurtenant uses. Off-site improvements will include a driveway extending from Doyle Road (Lassen County Road 361) approximately 100 feet to the subject parcel boundary. It is anticipated that utility connections will be provided in or adjacent to the driveway.

AREA CHARACTERISTICS

The project site is situated within the community of Doyle in southeastern Lassen County. The site is approximately 4,280 feet above mean sea level slopes gently to the northeast. The project site has been previously cleared, leveled, and irrigated for agricultural use in the past, but does not appear to have been recently used for agricultural purposes. Surrounding lands include large undeveloped parcels to the north and east. To the west of the site is Highway 395 and residential parcels about 2 to 3 acres in size. To the south of the site is Doyle Christian Church and residential/commercial parcels roughly ¼- to ½-acre in size. Union Pacific Railroad is located about 1,000 feet east of the project site. Long Valley Creek is about 2,000 feet east of the project site and Willow Ranch Creek is about 2,000 feet northwest of the project site.

The climate of the project vicinity is of the Mediterranean type, with cool, moist winters and warm, dry summers. Annual precipitation in the community of Doyle

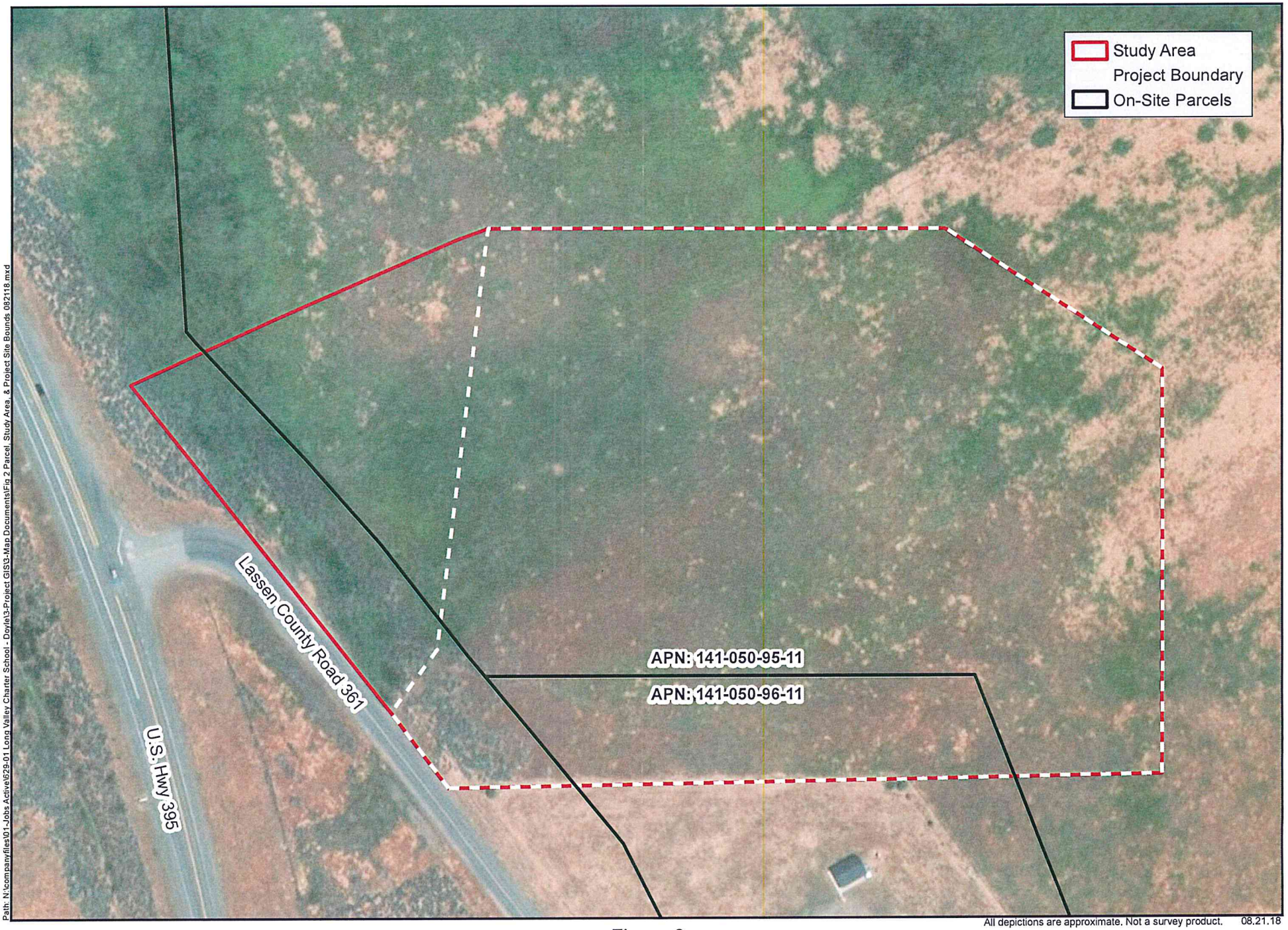


Figure 2

Parcel, Study Area, and Project Site Boundaries

ENPLAN

averages ±11.43 inches. Average minimum January temperatures are 20.1°F and average maximum July temperatures are 93.8°F[2].

Soils in the study area are mapped as Calpine sandy loam, 0 to 2 percent slopes. This soil unit formed of alluvium derived from granite; it is well drained, not hydric, and the depth to groundwater in more than 80 inches[3].

RECORDS REVIEW AND FIELD RECONNAISSANCE

Records Review

Records reviewed for this evaluation consisted of California Natural Diversity Data Base (CNDDB) records for special-status plants, animals, and natural communities (**Appendix B**); U.S. Fish and Wildlife Service (USFWS) records for federally listed, proposed, and Candidate plant and animal species under the jurisdiction of the USFWS (**Appendix B**); National Marine Fisheries Service (NMFS) records for anadromous fish species under the jurisdiction of the NMFS[4]; soils records maintained by the U.S. Department of Agriculture's Natural Resources Conservation Service (NRCS)[3], and National Wetlands Inventory (NWI) maps[5]. The CNDDB records search covered a five mile radius around the project site, which includes portions of the Constantia, Doyle, Frenchman Lake, and McKesick Peak quadrangles.

Field Reconnaissance

To determine the presence/absence of special-status plant and animal species, wetlands and other "Waters of the United States," and other sensitive natural communities on the study site a biological screening evaluation was completed by ENPLAN biologist Donald Burk and a field assistant on June 3, 2018. The survey was conducted over a four-hour period extending from approximately 10:00 A.M. to 2:00 P.M. The survey consisted of walking meandering transects throughout the study area, with more intensive evaluation in areas potentially supporting sensitive resources. Photographs of the study area are provided in Appendix C.

---

[2] https://wrcc.dri.edu/cgi-bin/cliMAIN.pl?cadoyl+nca
[3] https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx
[4] http://www.westcoast.fisheries.noaa.gov/protected_species/species_list/species_lists.html

NATURAL COMMUNITES

Review of CNDDB records identified no sensitive natural communities within five miles of the project area. Three plant communities were identified in the study area during the field evaluation **(Figure 3)**: ruderal grassland, big sagebrush scrub, and riparian scrub/wet meadow wetland. Ruderal grassland habitat is by far the most abundant habitat present in the study area, covering more than 87 percent of the study area and more than 97 percent of the project site. Ruderal grassland habitat consists of weedy plants that succeed in disturbed soils. The dominant plant species in the study area are tumble-mustard and downy brome; other common species include flixweed, broadleaved peppergrass, hairy whitetop, tall fescue, and other introduced herbaceous species. The ruderal grassland community is not included in the CDFW's California Natural Community List[6]; the most similar community is Association 42.020.01 (*Bromus tectorum*), which is not a sensitive community.

An intermittent stream enters the study area via a culvert under Doyle Road in the southwestern portion of the study area. The stream diffuses to a broad, moist to shallowly inundated wetland on the northeastern side of Doyle Road. Dominant shrubs in the wetland are California rose and sandbar willow; these shrubs form a nearly impenetrable stand in the wettest portions of the community. The outer margins of the wetland support herbaceous species such as common monkey flower, many-flowered monkeyflower, broadleaved peppergrass, biennial cinquefoil, and western marsh cudweed. The riparian scrub community is not included in the CDFW's California Natural Community List; seven sandbar willow communities are listed, only one of which is considered a sensitive natural community (*Salix exigua – Brickellia californica*), and three California rose communities are listed, none of which are considered sensitive. Nonetheless, this disturbed community is considered sensitive because it is a wetland as defined by the U.S. Army Corps of Engineers and California Department of Fish and Wildlife.

[5] https://www.fws.gov/wetlands/data/mapper.html
[6] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153398&inline

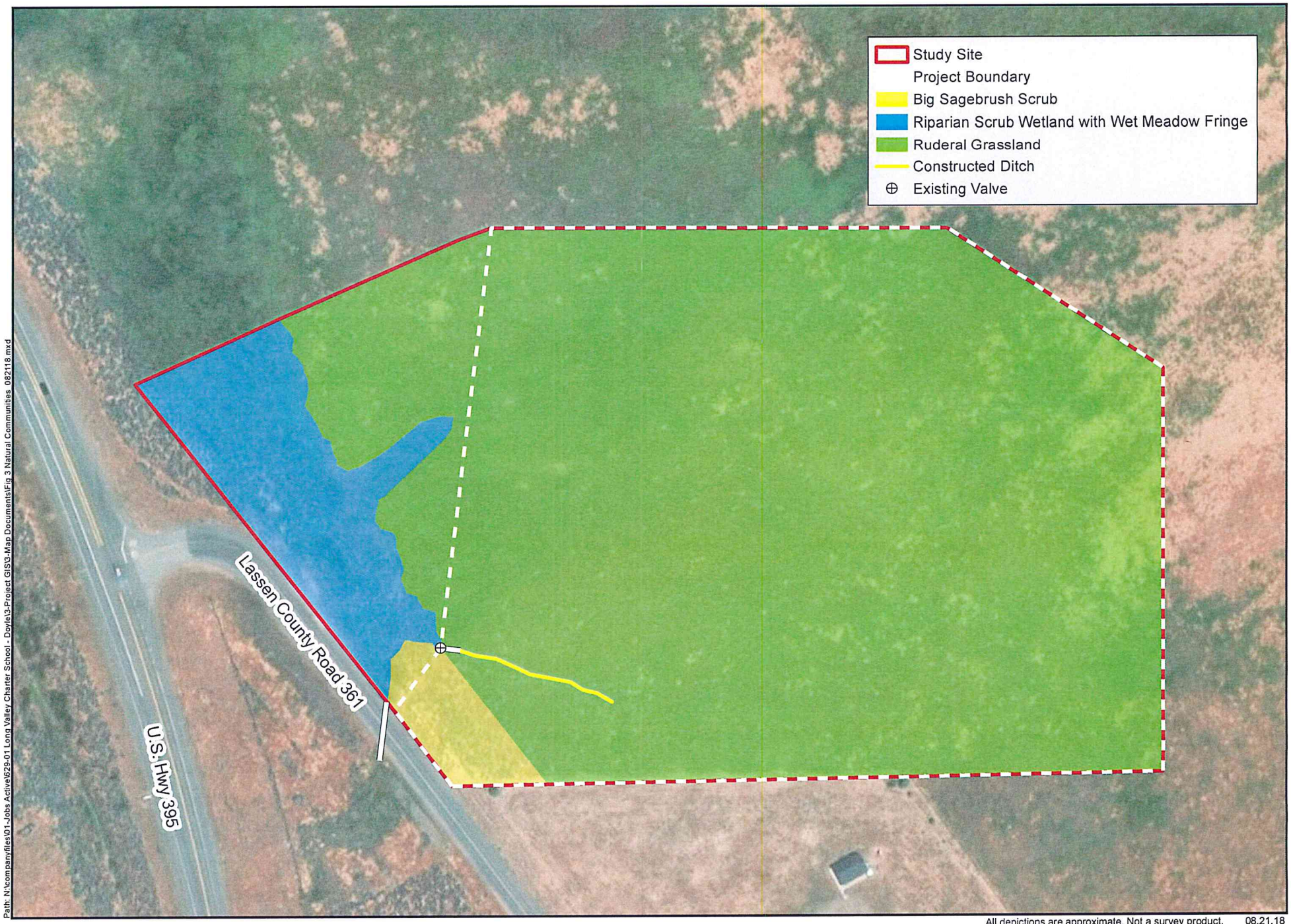


Figure 3

Natural Communities

ENPLAN

A relatively small patch of big sagebrush scrub habitat (0.35 acres) is present in the southwestern portion of the project site. Shrubs observed in this habitat include big sagebrush, white-stemmed rabbitbrush, and desert peach. Other species present include jagged chickweed, red-stemmed filaree, and various grasses. This community is identified in the CDFW List of Terrestrial Natural Communities as Association 35.110.01 (*Artemisia tridentata – Ericameria nauseosa*). The community is not identified by CDFW as a sensitive community.

Wetlands and Other Water of the United States

As noted above, the riparian scrub/wet meadow community is expected to qualify as a wetland subject to the jurisdiction of the U.S. Army Corps of Engineers and California Department of Fish and Wildlife. It is our understanding that this feature will be fully avoided by the proposed project; therefore no further action is needed with respect to this feature. However, one other potential water, a shallow constructed ditch, was noted within the project site (**Figure 3**). It is our expectation that this ditch is not subject to state or federal jurisdiction because it is not tributary to another water; further, a valve is present at the existing culverted driveway crossing, which would presumably allow flow into the ditch to be terminated. Nonetheless, we recommend that the Army Corps of Engineers be consulted to confirm that this feature is not subject to their jurisdiction.

SPECIAL-STATUS SPECIES

Special-Status Plants

Review of the USFWS species list (**Appendix B**) for the project area did not identify any federally listed plant species as potentially being affected by the proposed project. Likewise, the USFWS does not identify any designated critical habitat in the study site for federally listed plant species.

Review of CNDDB records (**Appendix B**) showed that the following special-status plant species are known to occur within a five mile radius of the project site: Bailey's ivesia, lance-leaved scurf-pea, Nevada daisy, Plummer's clover, Pulsifer's milk-

vetch, Schoolcraft's wild buckwheat, sticky pyrrocoma, Suksdorf's broom-rape, and western seablite.

The potential for each special-status plant species to occur on the project site is evaluated in **Table 1**. No special-status plant species were observed during the June 3, 2018, botanical field survey. Because the project site is nearly entirely covered with dense, weedy vegetation, no special-status plant species are expected to be present. A list of species observed on the site is provided in **Appendix D**.

Special-Status Animals

Review of the USFWS species list for the project area (**Appendix B**) identified one federally listed animal species as potentially being affected by the proposed project: North American wolverine. The USFWS does not identify designated critical habitat in the study site for any federally listed animal species. According to the NMFS records, no anadromous fish occur in the project area (Long Valley does not drain to the ocean).

Review of CNDDB records showed that one special-status animal species, Swainson's hawk, has been reported within a five-mile radius of the project site. Two non-status animal species have also been reported within a five-mile radius of the project site: Prairie falcon and Morrison bumble bee.

The potential for the above two special-status animals to occur on the project site is evaluated in **Table 1**. Wildlife species observed during the field included western meadowlark, white-faced ibis, turkey vulture, western yellow-bellied racer, and Great Basin spadefoot (tadpoles); evidence of fossorial rodents was also observed. Several small flocks of white-faced ibis were observed flying to the north and to the south, east of the project site. The white-faced ibis is on the CDFW Watch List, but is not a Species of Special Concern. No special-status animal species were observed during the field survey, nor are any expected to be present in the study area or be indirectly affected by project implementation.

NESTING MIGRATORY BIRDS

Under the Migratory Bird Treaty Act (MBTA) of 1918, migratory bird species, their nests, and their eggs are protected from injury or death, and any project-related

disturbances during the nesting period. In addition, California Fish and Game Code §3503 and §3503.5 provide regulatory protection to resident and migratory birds and all birds of prey within the State.

The study area has a low potential to support nesting birds. However, it is possible that active nests could be present in the sagebrush scrub or riparian thicket habitats in future years, or that ground-nesting birds could utilize the site. If nesting migratory birds are present, they could be directly or indirectly affected by construction activities. Direct effects could include mortality resulting from construction equipment operating in an area containing an active nest with eggs or chicks. Indirect effects could include nest abandonment by adults in response to loud noise levels or human encroachment, or a reduction in the amount of food available to young birds due to changes in feeding behavior by adults.

In the local area, most birds nest between February 1 and August 31, and the potential for adversely affecting nesting birds can be greatly minimized by conducting construction activities either before February 1 or after August 31. If this is not possible, a nesting survey should be conducted prior to commencement of construction. If active nests are found, construction activities would need to be postponed until after the young birds have fledged.

NOXIOUS WEEDS

A noxious weed is a plant that has been defined as a pest by law or regulation. The California Department of Food and Agriculture (CDFA) maintain a list of plants that are considered threats to the well-being of the state. A rating system has been devised to reflect CDFA's view of the statewide importance of the weed, the likelihood that eradication or control efforts would be successful, and the present distribution of the weed within the state. The ratings are not laws, but are policy guidelines that indicate the most appropriate action to take against a pest under general circumstances. Pertinent ratings are described as follows[7]:

> ***"A" Rated***: A pest of known economic or environmental detriment and is either not known to be established in California or it is present in a limited distribution that allows

[7] https://www.cdfa.ca.gov/plant/IPC/encycloweedia/winfo_weedratings.html

for the possibility of eradication or successful containment. A-rated pests are prohibited from entering the state because, by virtue of their rating, they have been placed on the of Plant Health and Pest Prevention Services Director's list of organisms "detrimental to agriculture" in accordance with the FAC Sections 5261 and 6461. The only exception is for organisms accompanied by an approved CDFA or USDA live organism permit for contained exhibit or research purposes. If found entering or established in the state, A-rated pests are subject to state (or commissioner when acting as a state agent) enforced action involving eradication, quarantine regulation, containment, rejection, or other holding action.

"B" Rated: A pest of known economic or environmental detriment and, if present in California, it is of limited distribution. B-rated pests are eligible to enter the state if the receiving county has agreed to accept them. If found in the state, they are subject to state endorsed holding action and eradication only to provide for containment, as when found in a nursery. At the discretion of the individual county agricultural commissioner they are subject to eradication, containment, suppression, control, or other holding action.

"C" Rated: A pest of known economic or environmental detriment and, if present in California, it is usually widespread. C-rated organisms are eligible to enter the state as long as the commodities with which they are associated conform to pest cleanliness standards when found in nursery stock shipments. If found in the state, they are subject to regulations designed to retard spread or to suppress at the discretion of the individual county agricultural commissioner. There is no state enforced action other than providing for pest cleanliness.

At least seven noxious weeds were observed in the study site, including one A-rated weed (Scotch thistle), three B-rated weeds (crossflower, hairy whitetop, and broadleaved peppergrass), and three C-rated weeds (bull thistle, Russian-thistle, and bindweed). One immature dodder was also observed as a parasite on water speedwell; some dodders are noxious weeds, but the on-site species is more likely to be a native.

The introduction and spread of noxious weeds during construction activities has the potential to impact natural habitats and agricultural lands. Noxious weeds could be introduced into the project area if unwashed construction vehicles are used on the site. Likewise, construction vehicles leaving the site could transport weed seeds to other construction sites. The potential for introduction and spread of noxious weeds can be avoided/minimized by using only certified weed-free erosion control materials, mulch, and seed; limiting any import or export of fill material to material that is known to be weed free; and requiring the construction contractor to thoroughly wash all equipment at a commercial wash facility immediately before and after the equipment is used on-site.

CONCLUSIONS AND RECOMMENDATIONS

Based on the records search results, field observations throughout the project area, and the above analyses, we make the following findings:

- No special-status plant species will be directly or indirectly affected by project implementation.
- No special-status animal species will be directly or indirectly affected by project implementation.
- Provided that standard erosion control measures are implemented and work is limited to the project site boundary shown on **Figure 2,** no wetlands or other sensitive natural communities will be directly or indirectly affected by project implementation. (As noted above, we recommend that the Corps of Engineers be consulted to confirm that the on-site ditch is not subject to their jurisdiction.)
- Migratory birds could potentially nest in and adjacent to the project site. However, implementation of **Mitigation Measure 1** would adequately minimize the potential impact to nesting birds.
- Project implementation has a high potential to result in the introduction and spread of noxious weeds. However, implementation of **Mitigation Measure 2** would adequately minimize the potential impact.

Mitigation Measure 1: Nesting Migratory Birds.

In order to avoid impacts to nesting migratory birds and/or raptors protected under the federal Migratory Bird Treaty Act and California Fish and Game Code §3503 and §3503.5, including their nests and eggs, one of the following shall be implemented:

a. *Vegetation removal and other ground-disturbance activities associated with construction shall occur between September 1 and January 31 when birds are not nesting.*

b. *If vegetation removal or ground disturbance activities occur during the nesting season, a pre-construction nesting survey shall be conducted by a qualified biologist to identify active nests in and adjacent to the work area. The survey shall take into account acoustic impacts and line-of-sight disturbances occurring as a result of the project in order to determine a sufficient survey radius to avoid nesting birds. The results of the survey shall be submitted to the California Department of Fish and Wildlife upon completion. The survey shall be conducted no more than one week prior to the initiation of construction. If construction activities are delayed or suspended for more than one week after the pre-construction survey, the site shall be resurveyed.*

If active nests are found, the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service shall be consulted to identify appropriate actions to comply with the Migratory Bird Treaty Act and California Fish and Game Code §3503. Compliance measures may include, but are not limited to, exclusion buffers, sound-attenuation measures, seasonal work closures based on the known biology and life history of the species identified in the survey, as well as ongoing monitoring by biologists.

Mitigation Measure 2: Noxious Weeds.

The potential for introduction and spread of noxious weeds shall be avoided/minimized by:

a. *Using only certified weed-free erosion control materials, mulch, and seed.*

b. *Limiting any import or export of fill material to material that is known to be weed free.*

c. *Requiring the construction contractor to thoroughly wash all construction vehicles and equipment at a commercial wash facility before and after its use at the project site.*

TABLES

Table 1. Potential for Special-Status Species to Occur on the Project Site

Table 1. Potential for Federally Listed, Proposed, and Candidate Species Identified by the IPaC Trust Resource Report, and Special-Status Species Identified by the CNDDB to Occur on the Project Site

COMMON NAME	SCIENTIFIC NAME	STATUS	GENERAL HABITAT DESCRIPTION	HABITAT PRESENT (Y/N)	CRITICAL HABITAT PRESENT (Y/N)	SPECIES PRESENT (Y/N/POT.)	RATIONALE/COMMENTS
Plants							
Bailey's ivesia	*Ivesia baileyi* var. *baileyi*	2B.3	Bailey's ivesia is a perennial herb that grows in volcanic rock habitats, often growing from crevices in sheer rock faces. The species is reported between 4,300 and 8,500 feet in elevation. The flowering period is May through August.	No	No	No	No suitable habitat for Bailey's ivesia is present in the study area. The species was not observed during the botanical field survey and is not expected to be present.
Lance-leaved scurf-pea	*Ladeania lanceolata*	2B.3	Lance-leaved scurf-pea is a perennial herb that grows in sandy clearings in Great Basin scrub and winter fat scrub communities, often in association with big sagebrush. The species is reported between 4,000 and 7,000 feet in elevation. The flowering period is May through July.	Yes	No	No	Potentially suitable habitat is present in the sagebrush community along Doyle Road. However, lance-leaved scurf-pea was not observed during the botanical survey and is not expected to be present.
Nevada daisy	*Erigeron eatonii* var. *nevadincola*	2B.3	Nevada daisy, a perennial herb, occurs on rocky soils in sagebrush scrub, northern juniper woodlands, and lower montane coniferous forests. The species is reported between 4,500 and 6,500 feet in elevation. The flowering period is May through July.	No	No	No	No rocky soils or other potentially suitable habitats for Nevada daisy are present in the study area. Nevada daisy was not observed during the botanical survey and is not expected to be present.
Plummer's clover	*Trifolium gymnocarpon* ssp. *plummerae*	2B.3	Plummer's clover is a perennial herb that grows in sagebrush scrub and pinyon/ juniper woodlands. The species is reported between 4,500 and 6,500 feet in elevation. The flowering period is May and June.	Yes	No	No	Although potentially suitable habitat for Plummer's clover is present in the study area, the species was not observed during the botanical survey and is not expected to be present.
Pulsifer's milk-vetch	*Astragalus pulsiferae* var. *pulsiferae*	1B.2	Pulsifer's milk-vetch is a perennial herb that grows in sandy or coarse granitic flats and on adjacent gentle slopes within sagebrush scrub communities, yellow pine forest, and pinyon/juniper woodlands. The species is reported from 3,700 to 6,900 feet in elevation. The flowering period is May through July.	Yes	No	No	Marginally suitable habitat is present in the sagebrush community along Doyle Road. However, Pulsifer's milk-vetch was not observed during the botanical survey and is not expected to be present.

Table 1. Potential for Federally Listed, Proposed, and Candidate Species Identified by the IPaC Trust Resource Report, and Special-Status Species Identified by the CNDDB to Occur on the Project Site

COMMON NAME	SCIENTIFIC NAME	STATUS	GENERAL HABITAT DESCRIPTION	HABITAT PRESENT (Y/N)	CRITICAL HABITAT PRESENT (Y/N)	SPECIES PRESENT (Y/N/POT.)	RATIONALE/COMMENTS
Schoolcraft's wild buckwheat	*Eriogonum microthecum* var. *schoolcraftii*	1B.2	Schoolcraft's wild buckwheat is a shrub that occurs in rocky, gravelly, and coarse sandy soils within Great Basin scrub and pinyon/juniper woodlands. The species is known only from the Diamond and Fort Sage mountains, where it occurs between 4,200 and 5,700 feet in elevation. The flowering period is July through September.	Yes	No	No	Marginally suitable habitat for Schoolcraft's wild buckwheat is present in the study area. Although the buckwheat would not have been in bloom at the time of the field survey, it would have been recognizable, at least to genus level. No buckwheats were observed during the botanical survey; Schoolcraft's wild buckwheat is not expected to be present.
Sticky pyrrocoma	*Pyrrocomma lucida*	1B.2	Sticky pyrrocoma is a perennial herb with distinctive leaves that grows up to 3 feet tall. The species occurs in meadows and alkali flats, usually on volcanic or mixed alluvial soils in sagebrush scrub or open forest habitats. The species is reported to occur between 1,900 and 6,900 feet in elevation. The flowering period is July through October.	No	No	No	No suitable habitat for sticky pyrrocoma is present in the study area. Although sticky pyrrocoma would not have been in bloom at the time of the field survey, it would have been recognizable, at least to genus level. Sticky pyrrocoma was not observed during the botanical survey and is not expected to be present.
Suksdorf's broom-rape	*Orobanche ludoviciana* var. *arenosa*	2B.3	Suksdorf's broom-rape, a perennial herb that is parasitic on *Iva* and *Ericameria*. The species occurs in Great Basin scrub communities between 4,300 and 6,800 feet in elevation. The flowering period is June through September.	Yes	No	No	Potentially suitable habitat for Suksdorf's broom-rape is present in the study area (i.e., several individuals of *Ericameria* are present). However, the species was not observed during the botanical survey and is not expected to be present.
Western seablite	*Suaeda occidentalis*	2B.3	Western seablite is an annual herb, occurs on moist alkaline soils. The species is reported from 3,900 to 6,600 feet in elevation. The flowering period is July through September.	No	No	No	No suitable habitat for western seablite is present in the project site. The species was not observed during the botanical survey and is not expected to be present.

Table 1. Potential for Federally Listed, Proposed, and Candidate Species Identified by the IPaC Trust Resource Report, and Special-Status Species Identified by the CNDDB to Occur on the Project Site

COMMON NAME	SCIENTIFIC NAME	STATUS	GENERAL HABITAT DESCRIPTION	HABITAT PRESENT (Y/N)	CRITICAL HABITAT PRESENT (Y/N)	SPECIES PRESENT (Y/N/POT.)	RATIONALE/COMMENTS
Animals							
California wolverine	*Gulo gulo*	FPT	Wolverines are dependent on areas in high mountains, near the tree-line, where conditions are cold year-round and snow cover persists well into May. Females use birthing dens that are excavated in snow. Birthing dens may be located on rocky sites, such as north-facing boulder talus or subalpine cirques. Wolverines are very sensitive to human activities and often abandon den sites in response to human disturbance.	No	No	No	No suitable habitat for California wolverines is present in the study area. No wolverines or den sites were observed during the wildlife survey, nor is the species expected to be present.
Swainson's hawk	*Buteo swainsoni*	ST	Swainson's hawks are found in shrub-steppe areas with scattered trees, large shrubs, and riparian areas. Nesting are generally built in lone trees, often near riparian areas. Foraging areas include lightly irrigated agricultural areas, particularly with alfalfa and grass hay, or non-agricultural areas with low or moderate height vegetation.	Yes (foraging)	No	Potentially Present	Suitable foraging habitat for the Swainson's hawk is present in the study area. However, the study area does not provide suitable nesting habitat. Thus, Swainson's hawk would not nest in the study area.

Federal Status

FE = Federally Listed – Endangered
FT = Federally Listed – Threatened
FC = Federal Candidate Species
FPT = Federal Proposed – Threatened
FD = Federally Delisted
FSC = Federal Species of Concern

State Status

SFP = State Fully Protected
SR = State Rare
SE = State Listed – Endangered
ST = State Listed – Threatened
SC = State Candidate Species
SD = State Delisted
SSSC = State Species of Special Concern
WL= Watch List

CDFW Rare Plant Rank

List 1A = Presumed extirpated in California and either rare or extinct elsewhere
List 1B = Rare or Endangered in California and elsewhere
List 2A = Presumed extirpated in California, but more common elsewhere
List 2B = Rare or Endangered in California, but more common elsewhere
List 3 = Plants for which we need more information - Review list (generally not considered special-status, unless unusual circumstances warrant)
List 4 = Plants of limited distribution - Watch list (generally not considered special-status, unless unusual circumstances warrant)

Threat Ranks

0.1 = Seriously Threatened in California
0.2 = Fairly Threatened in California
0.3 = Not Very Threatened in California

APPENDIX A

Resumes

DONALD M. BURK

Environmental Services Manager

Education

M.S. Botany
California State University, Chico

B.A. Chemistry and Biological Sciences
California State University, Chico

Professional Affiliations and Certifications

Society of Wetland Scientists
California Botanical Society
California Native Plant Society
Association of Environmental Professionals

Donald Burk has an in-depth background in a broad spectrum of environmental studies. His academic background includes graduate studies in environmental analysis methodology, biological sciences, and community planning. He has continued his professional development through completion of specialized courses in wetland delineation; wetland impacts and mitigations; vernal pool restoration and creation; noise assessments; Surface Mining and Reclamation Act regulations; erosion control practices; and hazardous materials evaluation and remediation. As environmental services manager with ENPLAN, Mr. Burk is instrumental in the preparation of environmental documents such as site assessment reports, environmental impact reports, biological studies, and noise evaluations. His responsibilities include project team management, key decision-making, coordination with applicable agencies, and final review of environmental documents. Having worked in the environmental consulting field since 1981, Mr. Burk has the skills and experience to manage studies to achieve reliable data and concise, effective documentation in a timely and cost-efficient manner.

While attending CSU, Chico, Mr. Burk was recognized as "Outstanding Organic Chemist of the Year," received an award of merit from the American Botanical Society, and delivered the valedictory address for the School of Natural Sciences. His Master's thesis was granted the first annual "Outstanding Thesis Award" by CSU, Chico.

Representative Experience

- *CEQA/NEPA Compliance.* Prepared environmental impact reports, environmental impact statements, and other environmental compliance documentation for a multitude of projects, including 516- and 1,244-acre industrial parks; public facilities projects including several sewage treatment plants, a 90-foot-high earthen dam and 15-acre reservoir, a 6-mile-long, 8-lane roadway, other new road corridors, and water supply projects; shopping centers and highway commercial developments; a 10,000-seat church; a 475-acre recreation ranch; ski areas; a softball park; four new schools; a 1-million cubic yard reservoir dredging project; numerous residential developments and many other projects.

- *Environmental Site Assessments.* Managed preparation of Phase I, II and III site investigations for a number of commercial and industrial facilities. Investigations have addressed wood-products manufacturing facilities, a major clothing manufacturing operation, dry cleaners, a medical clinic, ranches, a regional transmission transformer site, automotive shops and service stations, abandoned sewage treatment ponds, office buildings, shopping centers, and other uses.
- *Biological Studies.* Managed preparation of technical field studies, including wildlife and botanical studies for a 1,016-acre site in Sacramento County; fisheries, aquatic macroinvertebrate, and riparian vegetation studies for a 38-mile reach of the North Fork Feather River; botanical surveys for 175-mile and 265-mile underground telephone cable corridors; botanical surveys for over 2,400 acres on Mount Shasta proposed for ski area development; biological surveys for a 200-acre park site; spotted owl surveys; vernal pool fairy/tadpole shrimp and valley elderberry longhorn beetle assessments; and numerous other projects.
- *Wetland Delineations.* Managed preparation of wetland delineations and/or U.S. Army Corps of Engineers permit applications for a 1,016-acre site east of Sacramento, a 200-acre site in north Redding, a 580-acre site in the City of Weed, a 100-acre site near the Redding Municipal Airport, a transmission corridor project in east Redding, a 78-acre industrial parcel in the City of Benicia, and many other parcels throughout northern California.
- *Noise Studies.* Prepared noise studies for a variety of projects, including numerous traffic corridors; large industrial facilities such as a co-generation plant, food processing plant, and a regional scrap metal recycling facility; recreation facilities such as a new ski area and a community sports complex; many new residential developments; schools; and other facilities. Testified as an expert witness in a court case involving noise generated by electric- and diesel-powered water well pumps.
- *Reclamation Plans/Stream Restoration Projects.* Prepared mine reclamation plans and/or technical studies for projects including an aggregate pit adjacent to Cow Creek in Shasta County, a pumice quarry in Napa County, and underground gold mines in Shasta and Trinity Counties. Managed preparation of a stream restoration project for a reach of the Susan River, which involved hydraulic analysis, preparation of an earth-work plan, supervision of all on-site construction activities, preparation of a revegetation/erosion control plan and supervision of its implementation, and preparation of a monitoring program. Developed a plan, and obtained all agency approvals, for creation of 10 acres of riparian forest habitat along the Sacramento River to mitigate losses on a nearby parcel.

Publications

Burk, Donald et al. (29 contributing authors). Technical Editors Gary Nakamura, UC Cooperative Extension Service and Julie Kierstead Nelson, USDA Forest Service, Shasta-Trinity National Forest. 2001. *Illustrated Field Guide to Selected Rare Plants of Northern California.* University of California, Agriculture and Natural Resources. Publication 3395.

Luper, J. and D. Burk. 2014. Noteworthy collections: *Froelichia gracilis* (Amaranthaceae). Madrono 61(4):413-413.

APPENDIX B

CNDDB RareFind Report Summary

USFWS IPaC Report

Rarefind (CNDDB) Report Summary
Long Valley Charter School
July 11, 2018

Listed Element	Quadrangle [1]				Status [2]
	CO	DO	FL	MKP	
ANIMALS					
Morrison bumble bee		•		•	None
Prairie falcon		•	•		WL
Swainson's hawk	•	•			ST
PLANTS					
Bailey's ivesia	•				2B.3
Lance-leaved scurf-pea		•			2B.3
Nevada daisy		•			2B.3
Plummer's clover	•	•	•	•	2B.3
Pulsifer's milk-vetch	•				1B.2
Schoolcraft's wild buckwheat	•	•		•	1B.2
Sticky pyrrocoma				•	1B.2
Suksdorf's broom-rape	•				2B.3
Western seablite	•	•		•	2B.3

[1]QUADRANGLE CODE

CO	Constantia	FL	Frenchman Lake
DO	Doyle	MKP	McKesick Peak

[2]STATUS CODES

Federal

FE	Federally Listed – Endangered
FT	Federally Listed – Threatened
FC	Federal Candidate Species
FP	Federal Proposed Species
FD	Federally Delisted
FSC	Federal Species of Concern

State

SFP	State Fully Protected
SR	State Rare
SE	State Listed – Endangered
ST	State Listed – Threatened
SC	State Candidate Species
SD	State Delisted
SSSC	State Species of Special Concern
WL	Watch List

Rare Plant Rank

1A	Plants Presumed Extirpated in California and either Rare or Extinct Elsewhere
1B	Plants Rare, Threatened or Endangered in California and Elsewhere
2A	Plants Presumed Extirpated in California but Common Elsewhere
2B	Plants Rare, Threatened, or Endangered in California but More Common Elsewhere
3	Review List: Plants About Which More Information is Needed (generally not considered special-status, unless unusual circumstances warrant)
4	Watch List: Plants of Limited Distribution (generally not considered special-status, unless unusual circumstances warrant)

Rare Plant Threat Ranks

0.1 Seriously Threatened in California

0.2 Moderately Threatened in California

0.3 Not Very Threatened in California

IPaC **U.S. Fish & Wildlife Service**

IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Lassen County, California

Local office

Reno Fish And Wildlife Office

(775) 861-6300
(775) 861-6301

1340 Financial Boulevard, Suite 234
Reno, NV 89502-7147

http://www.fws.gov/nevada/

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population, even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information.
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Mammals

NAME	STATUS

North American Wolverine Gulo gulo luscus Proposed Threatened

No critical habitat has been designated for this species.
https://ecos.fws.gov/ecp/species/5123

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

THERE ARE NO CRITICAL HABITATS AT THIS LOCATION.

Migratory birds

Certain birds are protected under the Migratory Bird Treaty Act[1] and the Bald and Golden Eagle Protection Act[2].

Any person or organization who plans or conducts activities that may result in impacts to migratory birds, eagles, and their habitats should follow appropriate regulations and consider implementing appropriate conservation measures, as described below.

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Birds of Conservation Concern http://www.fws.gov/birds/management/managed-species/birds-of-conservation-concern.php
- Measures for avoiding and minimizing impacts to birds http://www.fws.gov/birds/management/project-assessment-tools-and-guidance/conservation-measures.php
- Nationwide conservation measures for birds http://www.fws.gov/migratorybirds/pdf/management/nationwidestandardconservationmeasures.pdf

The birds listed below are birds of particular concern either because they occur on the USFWS Birds of Conservation Concern (BCC) list or warrant special attention in your project location. To learn more about the levels of concern for birds on your list and how this list is generated, see the FAQ below. This is not a list of every bird you may find in this location, nor a guarantee that every bird on this list will be found in your project area. To see exact locations of where birders and the general public have sighted birds in and around your project area, visit the E-bird data mapping tool (Tip: enter your location, desired date range and a species on your list). For projects that occur off the Atlantic Coast, additional maps and models detailing the relative occurrence and abundance of bird species on your list are available. Links to additional information about Atlantic Coast birds, and other important information about your migratory bird list, including how to properly interpret and use your migratory bird report, can be found below.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, click on the PROBABILITY OF PRESENCE SUMMARY at the top of your list to see when these birds are most likely to be present and breeding in your project area.

NAME	BREEDING SEASON (IF A BREEDING SEASON IS INDICATED FOR A BIRD ON YOUR LIST, THE BIRD MAY BREED IN YOUR PROJECT AREA SOMETIME WITHIN THE TIMEFRAME SPECIFIED, WHICH IS A VERY LIBERAL ESTIMATE OF THE DATES INSIDE WHICH THE BIRD BREEDS ACROSS ITS ENTIRE RANGE. "BREEDS ELSEWHERE" INDICATES THAT THE BIRD DOES NOT LIKELY BREED IN YOUR PROJECT AREA.)
Sage Thrasher Oreoscoptes montanus This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9433	Breeds Apr 15 to Aug 10
Tricolored Blackbird Agelaius tricolor This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3910	Breeds Mar 15 to Aug 10

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read and understand the FAQ "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence ( )

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

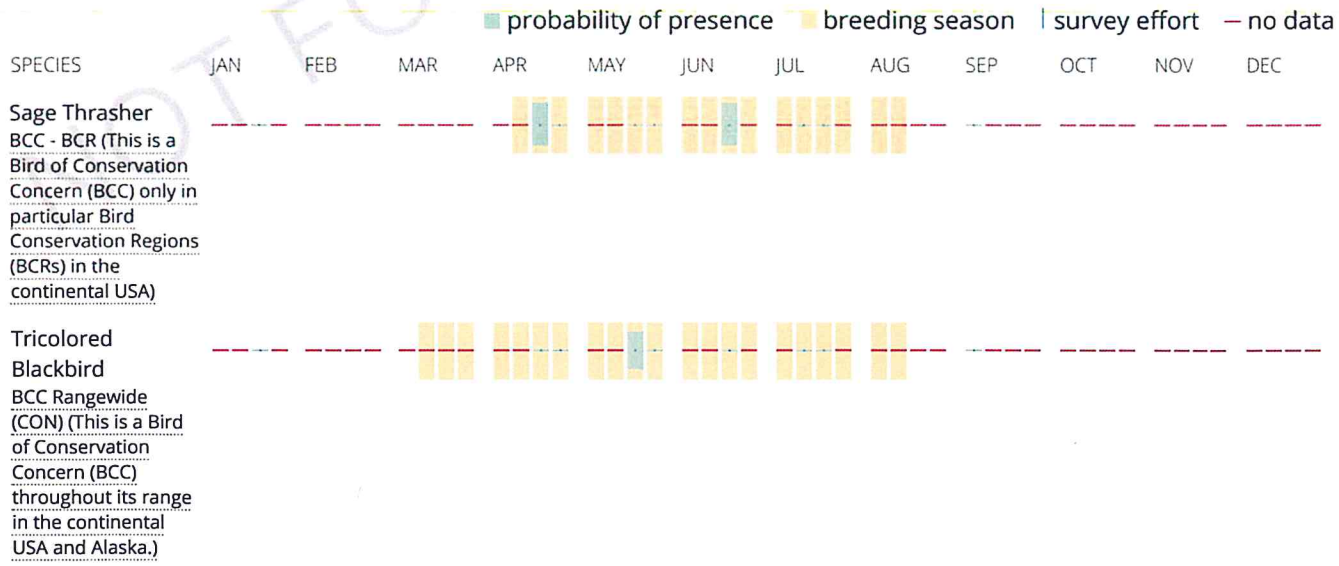
Breeding Season ( )
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



Tell me more about conservation measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Conservation Measures describes measures that can help avoid and minimize impacts to all birds at any location year round. Implementation of these measures is particularly important when birds are most likely to occur in the project area. When birds may be breeding in the area, identifying the locations of any active nests and

avoiding their destruction is a very helpful impact minimization measure. To see when birds are most likely to occur and be breeding in your project area, view the Probability of Presence Summary. Additional measures and/or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the migratory birds potentially occurring in my specified location?

The Migratory Bird Resource List is comprised of USFWS Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are a BCC species in that area, an eagle (Eagle Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, please visit the E-bird Explore Data Tool.

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets .

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, migrating or present year-round in my project area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating or year-round), you may refer to the following resources: The Cornell Lab of Ornithology All About Birds Bird Guide, or (if you are unsuccessful in locating the bird of interest there), the Cornell Lab of Ornithology Neotropical Birds guide. If a bird on your migratory bird species list has a breeding season associated with it, if that bird does occur in your project area, there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Eagle Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to try to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially eagles and BCC species of rangewide concern. For more information on conservation measures you can implement to help avoid and minimize migratory bird

impacts and requirements for eagles, please see the FAQs for these topics.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Bird tracking data can also provide additional details about occurrence and habitat use throughout the year, including migration. Models relying on survey data may not include this information. For additional information on marine bird tracking data, see the Diving Bird Study and the nanotag studies or contact Caleb Spiegel or Pam Loring.

What if I have eagles on my list?

If your project has the potential to disturb or kill eagles, you may need to obtain a permit to avoid violating the Eagle Act should such impacts occur.

Proper Interpretation and Use of Your Migratory Bird Report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated, and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please also look carefully at the survey effort (indicated by the black vertical bar) and for the existence of the "no data" indicator (a red horizontal bar). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list helps you know what to look for to confirm presence, and helps guide you in knowing when to implement conservation measures to avoid or minimize potential impacts from your project activities, should presence be confirmed. To learn more about conservation measures, visit the FAQ "Tell me about conservation measures I can implement to avoid or minimize impacts to migratory birds" at the bottom of your migratory bird trust resources page.

Facilities

Wildlife refuges and fish hatcheries

REFUGE AND FISH HATCHERY INFORMATION IS NOT AVAILABLE AT THIS TIME

Wetlands in the National Wetlands Inventory

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

THERE ARE NO KNOWN WETLANDS AT THIS LOCATION.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

APPENDIX C

Representative Photographs

View from northern portion of study area to south, showing ruderal grassland habitat

View to northeast across Doyle Road, with riparian scrub on left and big sagebrush on right

Irrigation valve upslope of culverted driveway crossing, view to northwest

Shallow irrigation ditch downslope of driveway crossing, view to northwest

APPENDIX D

Plant List

CHECKLIST OF VASCULAR PLANT SPECIES OBSERVED

Long Valley Charter School

June 3, 2018

Amaranthaceae	**Amaranth Family**
Amaranthus albus	Tumbleweed
Apocynaceae	**Dogbane Family**
Asclepias sp.	Milkweed
Asteraceae	**Sunflower Family**
Artemisia tridentata	Big sagebrush
Cirsium vulgare	Bull thistle
Ericameria nauseosa	White-stemmed rabbitbrush
Erigeron canadensis	Canadian horseweed
Erigeron divergens	Diffuse daisy
Gnaphalium palustre	Western marsh cudweed
Grindelia sp.	Gumplant
Lactuca serriola	Prickly lettuce
Onopordum acanthium	Scotch thistle
Tragopogon dubius	Goat's beard
Xanthium strumarium	Cocklebur
Boraginaceae	**Borage Family**
Amsinckia menziesii	Menzie's fiddleneck
Pectocarya penicillata	Winged pectocarya
Plagiobothrys tenellus	Slender popcorn-flower
Brassicaceae	**Mustard Family**
Chorispora tenella	Crossflower
Descurainia sophia	Flixweed
Lepidium appelianum	Hairy whitetop
Lepidium latifolium	Broadleaved peppergrass
Sisymbrium altissimum	Tumble-mustard
Caryophyllaceae	**Pink Family**
Holosteum umbellatum subsp. *umbellatum*	Jagged chickweed
Chenopodiaceae	**Goosefoot Family**
Chenopodium sp.	Goosefoot
Salsola sp.	Russian-thistle
Convolvulaceae	**Morning Glory Family**
Convolvulus arvensis	Bindweed
Cuscuta sp.	Dodder
Fabaceae	**Legume Family**
Melilotus sp.	Sweetclover
Geraniaceae	**Geranium Family**
Erodium cicutarium	Red-stemmed filaree

CHECKLIST OF VASCULAR PLANT SPECIES OBSERVED

Long Valley Charter School

Juncaceae	**Rush Family**
Juncus balticus subsp. *ater*	Baltic rush
Juncus bufonius	Toad rush
Juncus nevadensis var. nevadensis	Sierra rush
Onagraceae	**Evening-Primrose Family**
Epilobium ciliatum	Fringed willowherb
Phrymaceae	**Lopseed Family**
Mimulus floribundus	Many-flowered monkey flower
Mimulus guttatus	Common monkey-flower
Mimulus pilosus	Downy mimetanthe
Plantaginaceae	**Plantain Family**
Veronica anagallis-aquatica	Water speedwell
Veronica peregrina subsp. *xalapensis*	Purslane speedwell
Poaceae	**Grass Family**
Agropyron cristatum subsp. *pectinatum*	Desert crested wheatgrass
Bromus tectorum	Downy brome
Elymus glaucus	Blue wild rye
Elymus triticoides	Alkali ryegrass
Festuca arundinacea	Tall fescue
Hordeum murinum subsp. *murinum*	Wall barley
Poa bulbosa	Bulbous bluegrass
Polygonaceae	**Buckwheat Family**
Rumex crispus	Curly dock
Rosaceae	**Rose Family**
Potentilla biennis	Biennial cinquefoil
Prunus andersonii	Desert peach
Rosa californica	California rose
Salicaceae	**Willow Family**
Salix exigua	Sandbar willow
Scrophulariaceae	**Snapdragon Family**
Verbascum thapsus	Woolly mullein
Valerianaceae	**Valerian Family**
Plectritis sp.	Plectritis

Long Valley Charter School

Imagine-Achieve-Inspire

2018-2019
Long Valley Charter School
Morning Bus Schedule

Route 1:
Stop # (see map)

#1-6:50	Leave LVCS
#2-7:04	739-745 Sierra Vista
#3-7:06	446-430 Lakeview Dr
#4-7:08	740-425 Sage Valley Rd
#5-7:12	Community Center (West Patton)
#6-7:16	DS Hall & Tahoe
#7-7:18	CYS
#8-7:22	Arlington
#9-7:25	Jake's Lane 7:29 Herlong Junction
7:35	Back to LVCS to drop off Herlong students

Route 2:
Stop # (see map)

#1	7:40	Leave LVCS
#2	7:46	Old Hwy & Cowboy Joe
#3	7:48	437-905 Old Hwy 395
#4	7:49	Laura Dr. & Willow
#5	7:51	Laura Dr. & Roop
#6	7:52	Laura Dr. & Lassen
#7	7:54	Doyle Grade & Foothill
#8	7:58	482-585 Constantia Rd
#9	7:59	432-550 Constantia Rd
#10	8:00	Constantia & Ferris Rd-Turn Around
#11	8:04	434-470 Doyle Loop
#12	8:05	Main St & the Gazebo
#13	8:07	Hwy 395 & RV Park
	8:10	Return to LVCS

PO Box 7 ★ Doyle, CA 96109 ★ Phone: (530)827-2395 ★ Fax: (530)827-3562

Long Valley Charter School

Imagine-Achieve-Inspire

2018-2019

Afternoon Bus Schedule

Route 1 (see map for bus stops)

3:05 Depart form LVCS school

3:11 Old Hwy & Cowboy Joe

3:14 437-905 Old Hwy 395

3:17 Dewey Lane

3:19 Laura Dr.-Willow Dr.

3:21 Laura Dr. & Roop

3:22 Laura Dr. & Lassen

3:26 Doyle Grade & Foothill

3:30 482-585 Constantia Rd

3:31 432-550 Constantia Rd

3:32 Constantia & Ferris Rd-Turn Around

3:37 434-370 Doyle Loop

3:38 Main St at the Gazebo

3:40 Hwy 395 & RV Park

3:41 Back to LVCS to pick up Herlong Students

Route 2 (see map for bus stops)

3:46 A-26 & Dirt Turn Out

3:58 739-745 Sierra Vista

4:01 446-430 Lakeview Dr.

4:03 740-425 Sage Valley Dr.

4:07 Tamarack St. & the Community Center

4:12 D.S Hall & Tahoe

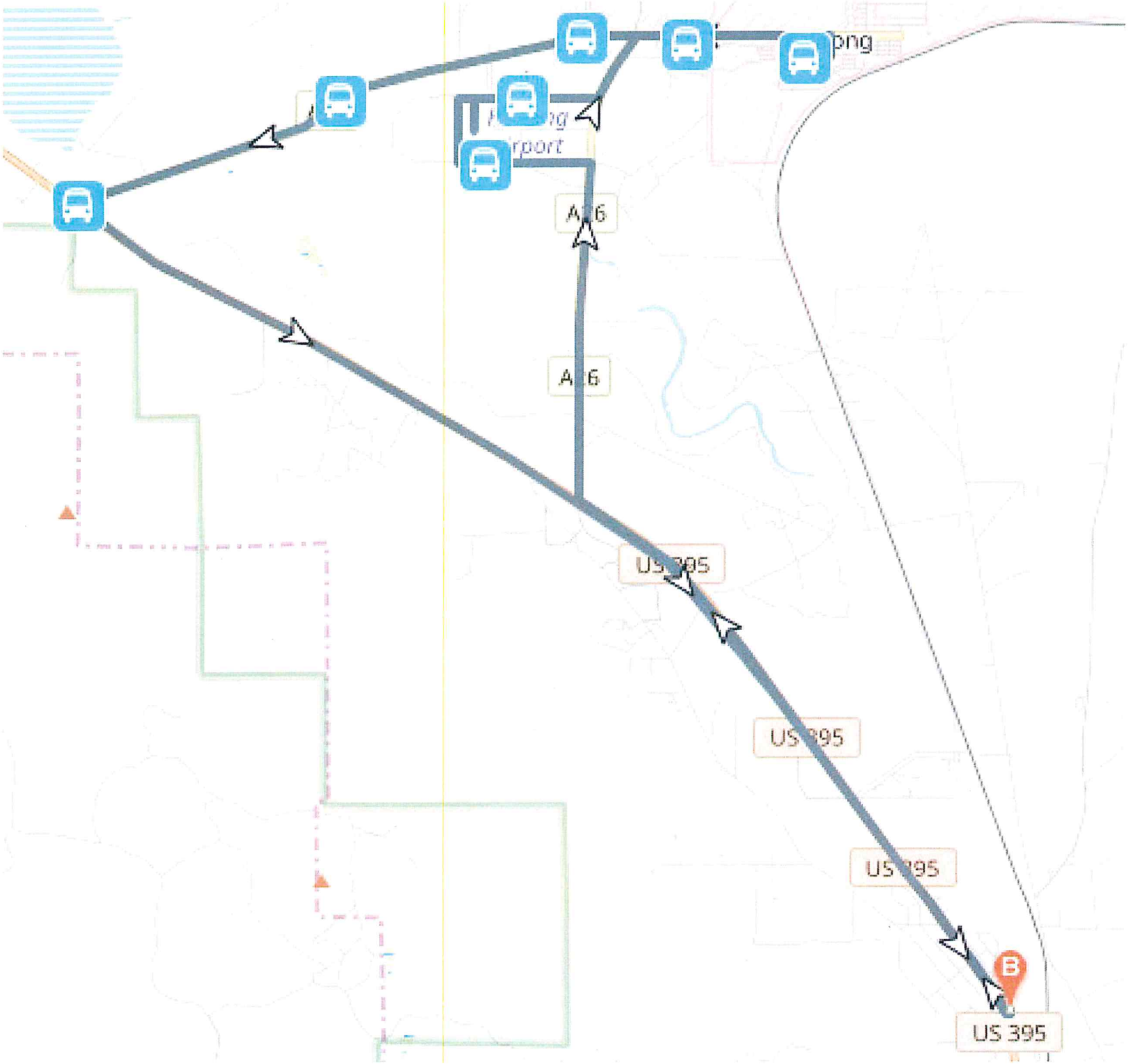
4:17 Arlington

4:21 Jake's Lane

4:30 Back to LVCS

4:25 Herlong Junction

PO Box 7 ★ Doyle, CA 96109 ★ Phone: (530)827-2395 ★ Fax: (530)827-3562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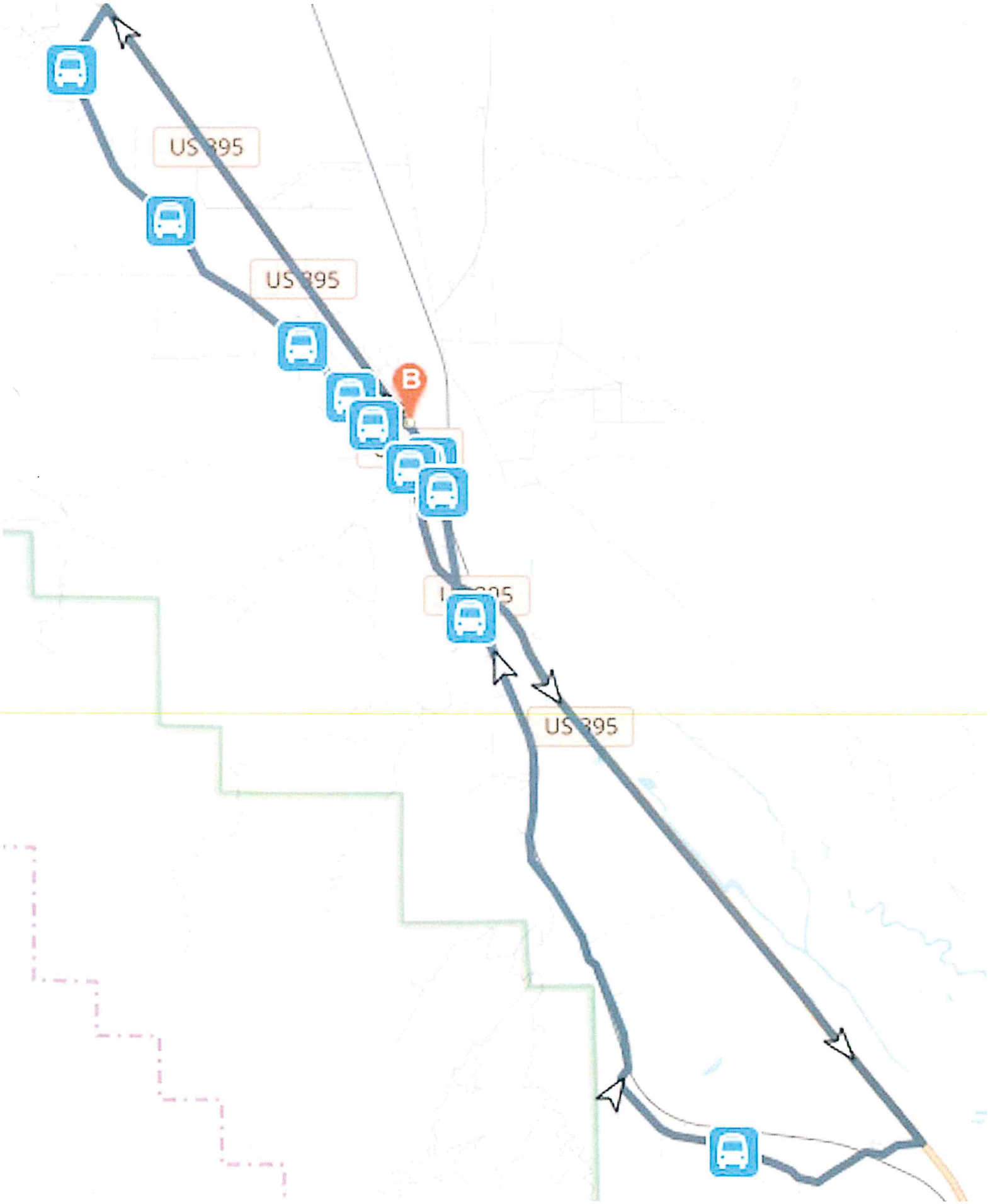
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Herbng
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