INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

WINTERS HIGH SCHOOL SOIL REMOVAL PROJECT

Prepared for

Winters Joint Unified School District

January 2021

Prepared by

Amy O. Skewes-Cox, AICP
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In conjunction with

BASELINE ENVIRONMENTAL CONSULTING
NATALIE MACRIS
TOM CAMARA GRAPHICS
WORDSMITH WORD PROCESSING

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PROJECT DESCRIPTION

1. **Project Title:** Winters High School Soil Removal Project

2. **Lead Agency Name and Address:**
   Winters Joint Unified School District
   909 West Grant Avenue
   Winters, CA 95694

3. **Contact Person and Phone Number:** Ms. Mary Fitzpatrick (707-249-1127)

4. **Project Location:** The project site is the existing Winters High School campus located at 101 Grant Avenue (State Route 128) in the incorporated City of Winters, Yolo County, California. The main access to the 20.96-acre campus is provided via Railroad Avenue, which connects to Grant Avenue. Other roads abutting the campus include Hemenway Street on the west. A project location map is provided in **Figure 1.** Maps showing the existing site plan of the campus and the proposed general areas of soil removal are provided in **Figures 2 and 3.**

5. **Project Sponsor's Name and Address:**
   Winters High School
   101 Grant Avenue
   Winters, CA 95694

6. **General Plan Designation:** Public Quasi-Public

7. **Zoning:** Public Quasi-Public

8. **Description of Project:**

The Winters Joint Unified School District (WJUSD), hereinafter referred to as the District or the WJUSD, will serve as the lead agency for this Initial Study/Mitigated Negative Declaration (IS/MND). The project evaluated in this IS/MND is the Removal Action Work Plan (RAW) for contaminated soil removal, prepared by Padre Associates, Inc., on behalf of the District, for the Winters High School Modernization Project. The Modernization Project has been previously addressed in other environmental documents listed below. Winters High School (the project site) is located at 101 Grant Avenue in Winters, Yolo County, as shown in **Figure 1.** The proposed area of soil removal is shown in **Figures 2 and 3**.

Figure 1

PROJECT LOCATION

SOURCE: Google Earth, 2018

AMY SKEWES~COX
ENVIRONMENTAL PLANNING

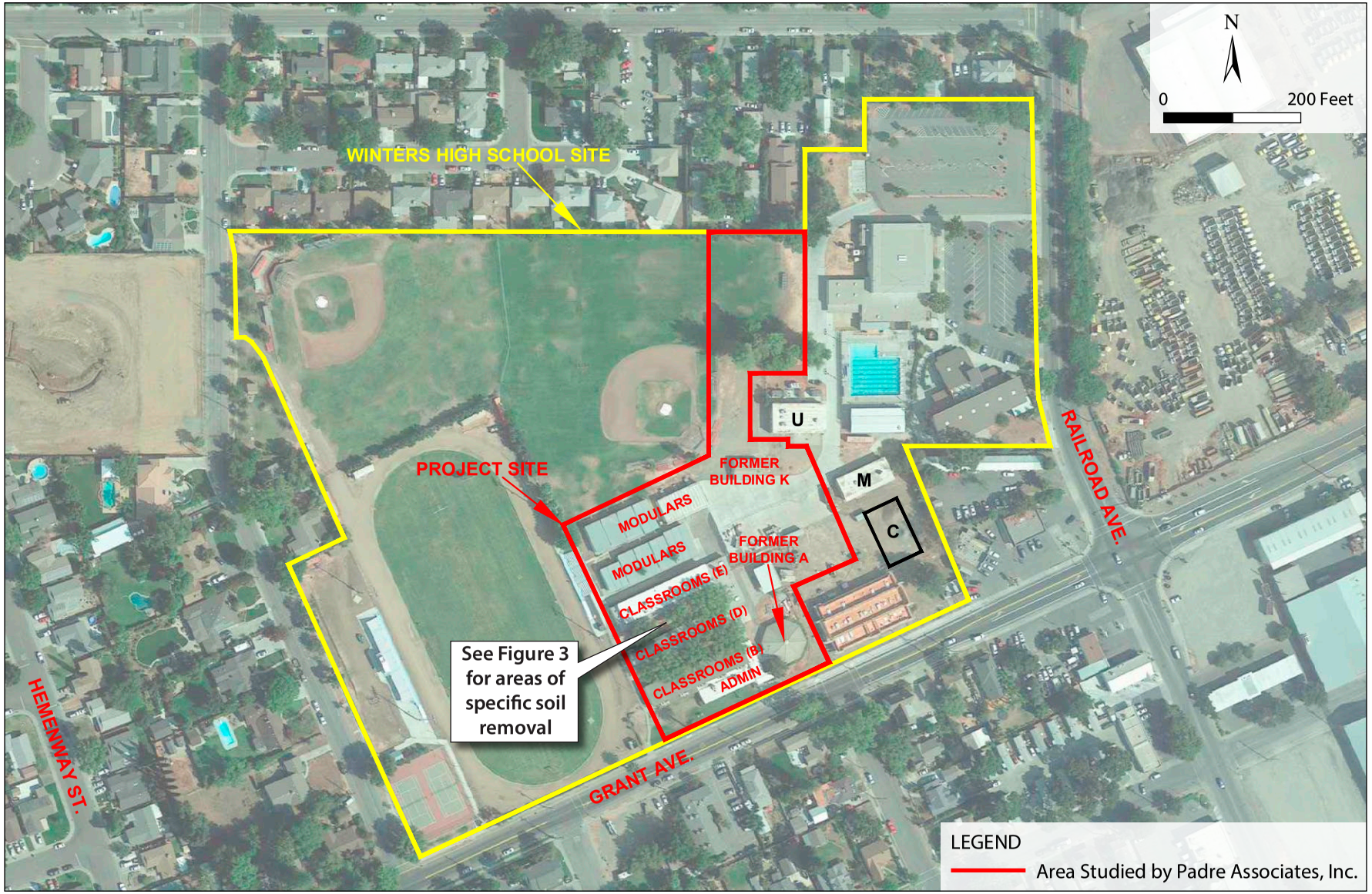

Figure 2

SOURCE: Padre Associates, Inc., 2020

CAMPUS AERIAL AND GENERAL AREA FOR SOIL REMOVAL

AOC	CUT DEPTH (FT)	AREA (FT^2)	EST. YD^3
1	2	270	~20
2	1.5	140	~8
3	1.5	210	~12
4	1.5	50	~4
5	2	1,770	~132
6	1.5	145	~9
7	1.5	70	~5
		TOTAL EST. YD^3	~190
		TOTAL EST. TONS	~314

Figure 3

SOURCE: Padre Associates, Inc., 2020

EXCAVATION PLAN

Background on the RAW

The RAW (Padre Associates, Inc., 2020) is based on the results of the following documents prepared by Padre Associates, Inc.:

- Preliminary Environmental Assessment – Equivalent Report, Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California, dated May 2020 (revised June 30, 2020); and
- Supplemental Site Investigation Summary Report, Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California (Site Code: 104819), dated September 15, 2020.

The Preliminary Environmental Assessment equivalent (PEA-e) and Supplemental Site Investigation (SSI) defined the extent of organochlorine pesticides (OCPs) and lead in surface and shallow surface soil at concentrations exceeding the California Department of Toxic Substances Control (DTSC) recommended screening levels for residential soil.

The RAW includes a detailed engineering plan for conducting the selected response action (RA) for each chemical of concern (COC) and the goals to be achieved by the RA, as required by California Health and Safety Code Section 25323.1. The RAW is also consistent with the criteria specified in Health and Safety Code Section 25356.1(h).

Proposed Soil Excavation, Disposal, and Cleanup

The selected RA for identified COCs (dieldrin and lead) in soil is the excavation and off-site disposal of impacted soil. Padre Associates, Inc. calculates that approximately 190 cubic yards (cy) of soil would require excavation and off-site disposal. The generation of dust during the soil removal operations would be minimized as necessary with the use of water as a dust suppressant.

The Recology (Hay Road Landfill), located at 6426 Hay Road in Vacaville, California, has been identified to accept, store, and/or treat non-hazardous soil generated from the removal activities. Based on the analytical results gathered during the RAW, it is anticipated that the removal soil would be disposed of as non-hazardous waste. Approximately 16 trucks would be needed to transport the excavated soil to the landfill. The excavation plan is presented in **Figure 3.** It is not anticipated that soil from beneath existing buildings would need to be removed. The area where soil removal would take place is primarily occupied by landscaping and pathways adjacent to buildings.

Site cleanup and haul-away would be completed in 3 weeks. Week 1 would include excavation and stockpiling of soil, and collection of landfill characterization and confirmation soil samples. Week 2 would include analytical laboratory analyses of collected soil samples. Week 3 would include loading and transporting soil to the approved landfill. For excavation, this work would require the operation of one excavator, one loader, and one water truck. For the off-haul, one loader, one water truck, and most likely four trucks making two round trips per day for two consecutive days (for a total of 16 truckloads) would be required.

Relationship of IS/MND to Previous Environmental Documents

This IS/MND evaluates the potential environmental impacts of the project, tiering off three previously prepared California Environmental Quality Act (CEQA) documents completed for the WJUSD so that the focus of this document can be on the RAW. The three previously prepared CEQA documents for other projects on the campus, which are incorporated by reference, are the following:

- Initial Study/Mitigated Negative Declaration for the Winters High School Measure R and Measure D Improvements (referred to herein as "the 2018 Initial Study/Mitigated Negative Declaration") (Winters Joint Unified School District, 2018)
- Notice of Exemption for the Winters High School 12-Classroom Building, Physical Education/Music Building, and Portable Relocation Project (referred to herein as "the 2020 Notice of Exemption") (Winters Joint Unified School District, 2020a)
- Notice of Exemption for the Winters High School New Four Classroom Building (referred to herein as "the 2017 Notice of Exemption") (Winters Joint Unified School District, 2017a)

In addition, the District prepared a Memorandum to File dated March 3, 2020 that provided background information relevant to the 2020 Notice of Exemption mentioned above. This Memorandum can be found on the District's website at https://www.wintersjusd.org (Winters Joint Unified School District, 2020b).

When appropriate, potential impacts are summarized from information contained in the above documents for topics other than hazards. These documents can be reviewed on the District's website at the following address: https://www.wintersjusd.org. For the topic of hazards, this IS/MND provides additional detail specific to the currently proposed project.

9. Surrounding Land Uses and Setting:

Single-family residences abut the high school campus to the west, south, and north. In some areas, these residences are separated from the developed portion of the campus by playing fields. The Winters Community Library and some commercial uses are located at the southeast edge of the campus. To the east of Railroad Avenue, there is a truck storage area (Double M Trucking). Grant Avenue forms the southern boundary of the campus and Railroad Avenue forms the eastern boundary. The Bobbie Greenwood Community Swim Center is located in the eastern portion of the campus and is a joint use facility operated by the City of Winters and the WJUSD.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

The WJUSD is the lead agency for the project. The Board of Trustees for the District would be responsible for adopting the Mitigated Negative Declaration (MND) for the project and approving the project.

In addition, the California Department of Toxic Substances Control (DTSC) will be responsible for approving the RAW that has been prepared by Padre Associates, Inc.

This IS/MND is intended to apply to all listed approvals and permits, as well as to any other approvals or permits necessary or desirable to implement the project.

Pursuant to California Government Code Section 53094, the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable to projects related to the provision of classroom facilities. For this project, the District adopted Resolution No. 1052-17 on December 7, 2017, pursuant to Government Code Section 53094, exempting projects and the campus from any zoning ordinances or regulations of the City of Winters and Yolo County, including, without limitation, the City's Municipal Code, the City's General Plan, the County's Code of Ordinances, the County's General Plan, and related ordinances and regulations that otherwise would be applicable.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

Assembly Bill 52 (AB 52), which became law on January 1, 2015, provides for consultation with California Native American tribes during the CEQA environmental review process and equates significant impacts on "tribal cultural resources" with significant environmental impacts.

The consultation provisions of the law require that a public agency consult with local Native American tribes that have requested placement on that agency's notification list for CEQA projects. Within 14 days of determining that a project application is complete, or a decision by a public agency to undertake a project, the lead agency must notify tribes of the opportunity to consult on the project, should a tribe have previously asked to be on the agency's notification list. California Native American tribes must be recognized by the Native American Heritage Commission (NAHC) as traditionally and culturally affiliated with the project site, and must have previously requested that the lead agency notify them of projects. Tribes have 30 days following notification of a project to request consultation with the lead agency.

The purpose of consultation is to inform the lead agency in its identification and determination of the significance of tribal cultural resources. If a project is determined to result in a significant impact on an identified tribal cultural resource, the consultation process must occur and conclude prior to adoption of a Negative Declaration or Mitigated Negative Declaration, or certification of an Environmental Impact Report (Public Resources Code Sections 21080.3.1, 21080.3.2, and 21082.3).

Tribal Outreach

The NAHC in West Sacramento was contacted to review its Sacred Lands File to identify registered, Native American sacred sites in or near the project site and to obtain a list of local tribes that may be eligible to consult with the WJUSD to address the Winters High School Measure R and Measure D Improvement Project's potential impacts on tribal cultural resources. Sharaya Souza, NAHC Staff Services Analyst, responded to the request for information via email on August 31, 2017, stating that "Sacred sites were identified in the project area provided" (NAHC, 2017). The NAHC also provided a list of three Native American tribes that may be eligible to consult with the WJUSD for the project,

pursuant to the requirements of AB 52. These three tribes consist of the Cortina Indian Rancheria, the United Auburn Indian Community, and the Yocha Dehe Wintun Nation. Only the United Auburn Indian Community has previously requested notification of CEQA projects sponsored by the WJUSD. However, due to the sensitivity of the project site for tribal cultural resources, as indicated by the NAHC's Sacred Lands File, all three tribes were notified of the Measure R and Measure D Improvement Project and offered an opportunity to consult with the WJUSD for the proposed project to identify potential impacts on tribal cultural resources and appropriate mitigation measures. The WJUSD sent letters describing the project and maps depicting the project site via certified mail on September 12, 2017. Consistent with Public Resources Code Section 21080.3.1(b), the WJUSD informed the tribes that they had 30 days to request consultation for the project.

In a letter dated October 13, 2017, the Yocha Dehe Wintun Nation responded to the WJUSD's consultation outreach that "the Tribe has concerns that the project could impact known archaeological/ cultural sites. Please send us the cultural resource study for this project." In its October 13, 2017, letter, the Yocha Dehe Wintun Nation did not formally request consultation with the WJUSD pursuant to AB 52. On December 30, 2020, the WJUSD mailed a letter to the Yocha Dehe Wintun Nation to confirm that the tribe did not formally request consultation for the project pursuant to AB 52. No response to the WJUSD's letter has been received from the Yocha Dehe Wintun Nation to date.

Tribal Consultation

To date, no California Native American tribe has formally requested consultation with the WJUSD to address the soil removal project's potential impacts on tribal cultural resources.

Although the NAHC identified sacred sites in the vicinity of the campus, the 2018 study for the 2018 Initial Study/Mitigated Negative Declaration (Winters Joint Unified School District, 2018) identified no evidence of Native American ancestral remains at the project site. As discussed in Section V, Cultural Resources, of the 2018 Initial Study/Mitigated Negative Declaration, the archaeological survey completed for the project did not identify surface evidence of Native American archaeological deposits and the potential for such buried deposits is low. The soil removal project would have no impact on known tribal cultural resources that are listed or eligible for listing in the California Register of Historical Resources or a local register of historical resources.

Environmental Factors Potentially Affected:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

Determination. (To be completed by the Lead Agency.)

On the basis of this initial evaluation:

❒ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

■ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

❒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

❒ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

❒ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature — Date: 12/29/2020

Diana M. Jimenez — Printed Name

Winters Joint Unified School District — For

REFERENCES

Native American Heritage Commission, 2017. *Winters High School Project, Yolo County,* August 31.Padre Associates, Inc., 2020. Removal Action Work Plan: Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California (Site Code 104819).

Winters Joint Unified School District (WJUSD), 2017a. Notice of Exemption for the Winters High School New Four Classroom Building, February.

Winters Joint Unified School District (WJUSD), 2017b. Resolution No. 1052-17, December 7.

Winters Joint Unified School District (WJUSD), 2018. Winters High School Measure R and Measure D Improvements Initial Study/Mitigated Negative Declaration, January.

Winters Joint Unified School District (WJUSD), 2020a. Notice of Exemption for the Winters High School 12-Classroom Building, Physical Education/Music Building, and Portable Relocation Project, March.

Winters Unified School District, 2020b. Memorandum to File Re: CEQA Compliance for Winters High School 12-Classroom Building, Physical Education/Music Building, and Portable Relocation Project, signed by Mar. Todd Cutler, Ed.D., Superintendent, March 3.

CHAPTER II
ENVIRONMENTAL CHECKLIST

INTRODUCTION

This Checklist addresses 20 environmental topics. Whenever a potentially significant impact is identified, a mitigation measure is identified. A summary of the identified mitigation measures is included as **Appendix A**. The potential impact conclusions are 1) potentially significant impact; 2) less than significant with mitigation incorporated; 3) less than significant impact; and 4) no impact. When an impact is found to be potentially significant, it is summarized and numbered with the identification of "Potentially Significant" summarized as "PS" at the end of the impact summary. At the end of each mitigation measure, the level of significance of the impact after mitigation is shown as "Less than Significant" (LTS) or "Potentially Significant" (PS).[1]

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

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

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

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

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would not have a substantial adverse effect on a scenic vista or damage any scenic resources within a State scenic highway. Soil removal would be a temporary action and would not degrade existing visual quality or conflict with any applicable zoning or other regulations governing scenic quality. The project site is both non-urbanized and urbanized in nature as a suburban area of development.

[1] This Mitigated Negative Declaration (MND) includes a discussion of impacts of the environment on the project, which, pursuant to recent California Supreme Court authority, are not California Environmental Quality Act (CEQA) impacts. The District has included this discussion based on traditional checklist questions in order to be more thorough in the overall analyses.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

II. AGRICULTURAL 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:

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 a 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?

IMPACT EVALUATION

No Impact

No farmland exists on the project site as mapped in the Farmland Mapping and Monitoring Program of the California Resources Agency. The site is an existing high school campus in an urbanized area of the City of Winters.

No Williamson Act contracts pertain to the project site, and the site is not zoned for agricultural use. The site is designated as "Public Quasi-Public (PQP)" by the City of Winters General Plan and is zoned "Public Quasi-Public (PQP)" (WJUSD, 2018).

The site is not zoned as forest land or timberland and no forest land exists at the project site.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

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

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

c) Expose sensitive receptors to substantial pollutant concentrations?

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

BACKGROUND

The project site is located within the boundaries of the Sacramento Valley Air Basin (SVAB) and is under the jurisdiction of the Yolo-Solano Air Quality Management District (YSAQMD). In the SVAB, the primary criteria air pollutants of concern are carbon monoxide (CO), ground level ozone formed through reactions of nitrogen oxides (NO_x) and reactive organic gases (ROG), and suspended particulate matter (i.e., respirable particulate matter [PM_{10}] and fine particulate matter [$PM_{2.5}$]). In July 2007, the YSAQMD adopted thresholds of significance to assist lead agencies in the evaluation and mitigation of air quality impacts under CEQA. The YSAQMD's thresholds, which were incorporated into the YSAQMD's 2007 *Handbook for Assessing and Mitigating Air Quality Impacts*, established levels at which emissions of ROG, NO_x, PM_{10}, CO, and toxic air contaminants (TACs) could cause significant air quality impacts. In accordance with the YSAQMD's CEQA guidance, the thresholds that relate to the analysis of the project's impacts on the environment are used in this CEQA analysis (see **Table 1)**.

TABLE 1 YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT (YSAQMD) RECOMMENDED PROJECT-LEVEL THRESHOLDS OF SIGNIFICANCE

Impact Analysis	Pollutant	Threshold of Significance
Regional Air Quality (Construction and Operation)	ROG	10 tons/year
	NO_x	10 tons/year
	PM_{10}	80 pounds/day
	CO	9.0 ppm (8-hour average) 20.0 ppm (1-hour average)
Local Community Risks and Hazards (Operation and/or Construction)	TACs (project)	Cancer risk increase > 10 in 1 million Chronic hazard index > 1.0

Notes: ROG = reactive organic gases; NOx = nitrogen oxides; PM_{10} = respirable particulate matter; CO = carbon monoxide; TACs = toxic air contaminants; ppm = parts per million
Source: WJUSD, 2018.

Yolo County is in non-attainment of the federal $PM_{2.5}$ and the state PM_{10} ambient air quality standards, as well as the federal and state ozone ambient air quality standards. The county is in attainment or unclassified for all other criteria pollutants. In accordance with the federal Clean Air Act (CAA) and California Clean Air Act (CCAA), the YSAQMD and other air districts in the SVAB are required to prepare and update air quality plans to achieve the federal and state ambient air quality standards. As

discussed further below, the YSAQMD has adopted the following air quality plans to attain federal and state ambient air quality standards:

- The Sacramento Metropolitan Air Quality Management District's 2015 Triennial Report and Air Quality Plan Revision;
- The 1994 Sacramento Area Regional Ozone Attainment Plan;
- The 2017 Sacramento Regional 2008 National Ambient Air Quality Standards (NAAQS) 8-Hour Ozone Attainment and Reasonable Further Progress Plan; and
- The 2013 PM2.5 Implementation/Maintenance Plan.

In May 1992, the YSAQMD adopted the Sacramento Air Quality Management District's 1991 *Air Quality Attainment Plan*, which identifies feasible emission control measures to reduce emissions of ozone and attain state ozone standards. (The CCAA does not require attainment plans for particulate matter.) The control measures focus on emission sources under the YSAQMD's authority, specifically stationary emission sources, and some area-wide sources. The plan is updated every 3 years based on an evaluation of existing emissions and projected emissions from population, industry, and vehicle-related growth. The plan was most recently updated in accordance with the 2015 *Triennial Report and Air Quality Plan Revision*.

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would not include any new stationary or area-wide sources that could potentially hinder or disrupt implementation of the ozone reduction measures described under the *Triennial Report and Air Quality Plan Revision*.

Given the limited amount of construction associated with the soil removal project, the project is not expected to 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, or expose sensitive receptors to substantial pollutant concentrations. The project would not result in other emissions (e.g., those leading to odors) adversely affecting a substantial number of people. There would only be 16 truck trips required for the removal of the soil and no significant air emissions would be associated with these trucks.

For the soil removal project, the generation of dust during the removal operations would be minimized as necessary with the use of water as a dust suppressant. The water would be available via a water truck or a metered discharge from a fire hydrant located proximate to the project site. The RA contractor would control dust generation by spraying water prior to daily work activities, during excavation/loading activities (as necessary to maintain concentrations below action levels), and at truck staging locations. Watering equipment would be continuously available to provide proper dust control. Therefore, the project's impact would be less than significant, and no mitigation measures would be necessary.

An air monitoring professional would monitor on-site meteorological instrumentation and/or coordinate with off-site meteorological professionals to identify conditions that require cessation of work. If wind speeds become elevated, initially, the increased application of water suppressant (water) would be employed. If an uncontrollable condition occurs (e.g., exceeding dust action levels), all removal activities would cease, stockpiled soil(s) would be covered, and the excavation areas would be covered, if necessary. Work activities would not resume until conditions are stabilized or mitigation and/or effective engineering control measures are implemented, and conditions are found acceptable to proceed.

REFERENCES

Winters Joint Unified School District (WJUSD), 2017. Notice of Exemption for the Winters High School New Four Classroom Building, February.

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

Winters Joint Unified School District (WJUSD), 2020. Notice of Exemption for the Winters High School 12-Classroom Building, Physical Education/Music Building, and Portable Relocation Project, March.

IV. BIOLOGICAL RESOURCES. Would the project:

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

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 U.S. Fish and Wildlife Service?

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

d) Interfere substantially with the movement of any 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?

IMPACT EVALUATION

No Impact

No biological resources would be adversely affected by the soil removal project. No trees would be removed and no critical habitat would be affected.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

V. CULTURAL RESOURCES. Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

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

IMPACT EVALUATION

Less Than Significant with Mitigation Incorporated

Records Search and Literature Review

For the 2018 Initial Study/Mitigated Negative Declaration, a records search at the Northwest Information Center (NWIC) was conducted and included a review of archaeological site location information and a review of the State of California Office of Historic Preservation (OHP) 2012 *Directory of Properties in the Historic Property Data File*. The *Directory of Properties* includes listings for the National Register of Historic Places, National Historic Landmarks, the California Register of Historical Resources, California Historical Landmarks, and California Points of Historical Interest. The NWIC records search did not identify recorded historical resources at or immediately adjacent to the project site or campus.

The OHP *Directory of Properties* assigns a status code of "5S2" to nearby buildings at 213 Grant Avenue and 717 and 720 Hemenway Street, indicating that these are eligible for local historical listing. However, none of these nearby historical resources would be directly or indirectly affected by the proposed project.

A review of historical maps, including Sanborn Fire Insurance and U.S. Geological Survey (USGS) maps, was completed to assess the potential for subsurface, historic-period archaeological deposits at the Winters High School campus. The earliest Sanborn Fire Insurance map coverage of the project site dates from 1893. This 1893 map depicts at least six dwellings and water tank along Grant Avenue between Railroad Avenue and Second Street at the current project site. Several buildings are also depicted at this same location on USGS maps published in 1907 and 1916, indicating that a residential area was established along Grant Avenue during the late 19th and early 20th centuries at what would later become Winters High School.

A review of regional geologic maps and information was completed to determine the potential for subsurface, pre-contact archaeological deposits at the Winters High School campus. Surface geology at the project site is mapped as "Older alluvium" associated with the Late Pleistocene Modesto-Riverbank Formation. Geotechnical investigations conducted at the project site encountered

interlayered clays, silts, sands, and gravels, which are consistent with the mapped geology at the project site. Elsewhere, the Modesto Formation has been dated to have a minimum age of 12,000 years (Helley and Harwood, 1985:10), which likely pre-dates human occupation in the region. As such, pre-contact archaeological deposits are anticipated to be at or near the surface of this geologic unit. Regional geoarchaeological mapping indicates that the general vicinity of the project site is of low to very low sensitivity for buried pre-contact archaeological deposits. As with historic-period archaeological deposits, however, there is a potential for pre-contact archaeological deposits to be obscured by fill material or modern development.

A qualified archaeologist surveyed the project site on October 31, 2017. At the time of the survey, there was good visibility of surface soils at the southeast portion of the campus due to recent tree removals, grading, and a trench excavation for a water pipeline. Isolated, historic-period artifacts were noted on the recently disturbed surface. Sparse historic-period artifacts were also observed embedded within the trench sidewall and in the spoils placed along the length of the recently excavated trench. Observed artifacts consisted of late-19th to early-20th century artifacts, including ceramic tableware fragments, bottle and window glass, structural debris, metal artifacts, and saw-cut animal bone fragments. Diagnostic maker's marks on some of the ceramic fragments indicate an approximate date range of circa 1870-1920 for these materials. This date indicates a likely association with the dwellings that were once present along Grant Avenue at this location.

Impact CULTURAL-1. The proposed soil removal project could affect unrecorded historic-period archaeological deposits, thereby causing a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5. (PS)

In accordance with CEQA Guidelines Section 15064.5(c), if the project would affect an archaeological deposit, the lead agency must first determine whether the deposit is a "historical resource" (see CEQA Guidelines Section 15064.5(a)). If the deposit is not a historical resource, the lead agency must determine if the deposit is a "unique archaeological resource."

Background research was done for the 2018 Initial Study/Mitigated Negative Declaration to identify archaeological deposits—and the potential for encountering such deposits—including those that qualify as archaeological resources under CEQA. This background research determined that there are no recorded archaeological resources on the project site, although there is a potential for encountering subsurface historic-period archaeological deposits during construction.

Based on the significance criteria identified above, the project would have a significant impact on the environment if ground-disturbing activities would cause a substantial adverse change in the significance of a historical or archaeological resource. A substantial adverse change in the significance of an archaeological resource would occur from its demolition, destruction, relocation, or alteration such that the significance of the resource would be materially impaired (CEQA Guidelines Section 15064.5(b)(1)). For the current project, the significance of a historical resource would be materially impaired if ground disturbance would alter in an adverse manner those physical characteristics of the resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources. Therefore, the following mitigation measure is recommended for the soil removal project:

Mitigation Measure CULTURAL-1a: An archaeologist shall monitor project ground disturbance associated with the soil removal project. Monitoring shall continue at this location for up to ten 8-hour construction days during which project ground disturbance is occurring. After this period of monitoring, archaeological monitoring shall occur on an as-needed basis and Mitigation Measure CULTURAL-1b shall apply. The archaeological monitoring shall be overseen by an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology.

Should an archaeological deposit be encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and the on-site archaeologist shall assess the deposit, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. The Winters Joint Unified School District shall be notified by the construction contractor within 24 hours of the encounter. If the deposit is found to be significant by the on-site archaeologist (i.e., eligible for listing in the California Register of Historical Resources), the District shall be responsible for funding and overseeing implementation of appropriate mitigation measures. Mitigation measures may include, but would not be limited to, recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate local curation facility and used for future research and public interpretive displays, as appropriate.

Mitigation Measure CULTURAL-1b: Should an archaeological deposit be encountered during project subsurface construction activities when an archaeological monitor is not on-site, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the California Register of Historical Resources), the District shall be responsible for funding and implementing appropriate mitigation measures. Mitigation measures may include recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate local curation facility and used for future research and public interpretive displays, as appropriate.

With implementation of the above mitigation measures, the potential impact on historic-period archaeological deposits would be reduced to a less-than-significant level. (LTS)

Geologic Map and Literature Review

As described above, geologic mapping indicates the project site is underlain by the Quaternary-aged Modesto Formation (Late Pleistocene in age), which is an unconsolidated and weathered mixture of gravel, sand, silt, and clay in terrace and alluvial fan deposits (Helley and Harwood, 1985). The Modesto Formation is broken up into an upper member and a lower member. Most of the project site is underlain by the lower member. This member has been given an age between 29,000 and 42,500 years old (Helley and Harwood, 1985:10). The northwest corner of the campus, in the vicinity of the westernmost baseball field, is shown to be underlain by the upper unit of the Modesto Formation. This unit has been dated to somewhere between 12,000 and 26,000 years old (Helley and Harwood, 1985:10).

These Pleistocene-aged deposits formed during the Rancholabrean North American Land Mammal Age (11,000-240,000 years ago). Fossils are known in similar Rancholabrean deposits from excavations for roads, housing development, and quarries, as well as scientific investigations within the northern and central California area within the Sacramento Valley. These fossils include mammoths, mastodons, horses, camels, saber-toothed cats, coyotes, and deer, as well as smaller animals like rodents, birds, reptiles, and fish (Bell et al., 2004). As such, these deposits are considered to have high paleontological sensitivity according to the *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources* paleontological resource guidelines (Society of Vertebrate Paleontology, 2010).

University of California Museum of Paleontology (UCMP) Fossil Locality Search

According to the UCMP locality search, there are no known fossil localities within the boundaries of the project site. However, the museum has records of one fossil locality from the Pleistocene-aged Modesto Formation bedrock within the boundaries of Yolo County. This locality includes eight fossil specimens that consist of dentary, cranial, and post cranium material from seven unknown rodents, and one vertebra from an unknown snake. Five other Modesto Formation fossil localities listed in the UCMP database are located in central California and include 19 fossil elements from giant sloths, bison, camels, and mammoths in Stanislaus County and Fresno County. No other fossil localities were listed within the UCMP database.

Summary of Impacts on Fossils

Based on the geology underlying the project site and recorded fossils previously identified in association with the Modesto Formation, there is a potential that project ground-disturbing activities could unearth scientifically important fossils. Should fossils be encountered during construction, the project would have a potentially significant impact on unique paleontological resources unless appropriate mitigation measures were incorporated.

Impact CULTURAL-2: As a result of ground-disturbing activities, the project could adversely affect previously unidentified fossils underlying the Winters High School campus. (PS)

> *Mitigation Measure CULTURAL-2: A qualified paleontologist shall be retained to monitor project ground-disturbing activities associated with the soil removal project. Paleontological monitoring*

shall be done for up to ten 8-hour construction days during which project ground disturbance is occurring. After this period, paleontological monitoring shall occur on an as-needed basis. Paleontological monitors shall be empowered to halt construction activities at the location of the discovery to review possible paleontological materials and to protect the resource while the finds are being evaluated. Samples of matrix may be collected, as appropriate, for processing, sorting, and microscopic examination to determine if fossils are present. Monitoring shall continue until, in the paleontologist's judgment, fossils are not likely to be encountered.

If paleontological resources are discovered during project activities, all work within 25 feet of the discovery shall be redirected. The Winters Joint Unified School District shall contact a qualified paleontologist—if a paleontological monitor is not on-site—to assess the situation, determine whether the paleontological resources are considered significant, and, if so, make recommendations regarding their treatment. Adverse effects on paleontological resources shall be avoided by project activities to the extent feasible. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. Paleontological resources are considered significant if they possess the possibility of providing new information regarding past life forms, paleoecology, stratigraphy, and geological formation processes. If the resources are not significant, mitigation is not necessary. If the resources are significant, adverse effects on the resource shall be mitigated. Mitigation may include recordation of the fossil locality, data recovery and analysis, a technical data recovery report, and accessioning of the fossil material and technical report to a paleontological repository. Public educational outreach may also be appropriate.

Upon completion of the paleontological monitoring, a report of findings with an appended, itemized inventory of specimens, as appropriate, shall be prepared and submitted to an appropriate repository, such as the University of California Museum of Paleontology. (LTS)

REFERENCES

Bell, C.J., E.L. Lundelius Jr., A.D. Barnosky, R.W. Graham, E.H. Lindsay, D.R. Ruez Jr., H.A. Semken Jr., S.D. Webb, and R.J. Zakrzewski, 2004. The Blancan, Irvingtonian, and Rancholabrean Mammal Ages, p. 232–314. In M.O. Woodburne (ed.), *Late Cretaceous and Cenozoic Mammals of North America: Biostratigraphy and Geochronology*. Columbia University Press, New York.

Helley, E.J., and D.S. Harwood, 1985. *Geologic map of the Late Cenozoic deposits of the Sacramento Valley and Northern Sierran Foothills, California*. Miscellaneous Field Studies Map MF-1790. USGS, Washington, D.C.

Society of Vertebrate Paleontology, 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources Society of Vertebrate Paleontology*. Society of Vertebrate Paleontology Impact Mitigation Guidelines Revision Committee.

University of California Museum of Paleontology (UCMP), 2017. UCMP Fossil Locality Database. Available at: http://ucmpdb.berkeley.edu/, accessed August 23, 2017.

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

VI. ENERGY. Would the project:

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

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

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would not result in wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with any state or local plan for renewable energy or energy efficiency. The main energy use would be associated with construction equipment which would be operating for less than three weeks.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

VII. GEOLOGY AND SOILS. Would the project:

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

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

ii) Strong seismic ground shaking?

iii) Seismic-related ground failure, including liquefaction?

iv) Landslides?

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 direct or indirect 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 wastewater?

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

IMPACT EVALUATION

Less Than Significant Impact

The project site is within the Great Valley geomorphic province, which is characterized by alluvial and floodplain deposits generated by the erosion of the Sierra Nevada mountains to the east and the Coast Ranges to the west. The site is underlain by alluvium of the Modesto-Riverbank Formation. The shallowest soils encountered during the geotechnical study were silty clays from the surface to 5 to 10 feet below ground surface (bgs), underlain by layers of silty sands and clayey sands to about 19 feet bgs. Soils deeper than 19 feet were silty, sandy gravels.

The project site vicinity includes numerous active faults identified by the California Geological Survey (CGS) under the Alquist-Priolo Earthquake Fault Zoning Act. CGS defines an active fault as one that has ruptured during the Holocene Epoch (i.e., the last 11,000 years). The probability of one or more large earthquakes (magnitude 6.7 or greater) occurring in Northern California between 2014 and 2044 was calculated at about 95 percent (Field, E.H. and 2014 Working Group on California Earthquake Probabilities, 2015). It is likely that a significant earthquake could affect the project site but this is not expected to result in significant impacts associated with the soil removal project.

No impacts associated with geologic issues or soils are anticipated for the soil removal project. Impacts on paleontological resources are addressed in Section V, Cultural Resources, above.

REFERENCES

Field, E.H. and 2014 Working Group on California Earthquake Probabilities, 2015. UCERF3: USGS Report, *New Earthquake Forecast for California's Complex Fault System*. Available at: https://pubs.usgs.gov/fs/2015/3009/pdf/fs2015-3009.pdf, accessed 2018.

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

VIII. GREENHOUSE GAS EMISSIONS. Would the project:

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?

IMPACT EVALUATION

Less Than Significant Impact

The primary greenhouse gas (GHG) emissions of concern are carbon dioxide, methane, and nitrous oxide. Other GHGs of concern include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, but their contribution to climate change is less than 1 percent of the total GHGs that are well mixed (i.e., that have atmospheric lifetimes long enough to be homogeneously mixed in the troposphere)

(Intergovernmental Panel on Climate Change, 2013). Each GHG has a different global warming potential. For instance, methane traps about 21 times more heat per molecule than carbon dioxide. As a result, emissions of GHGs are reported in metric tons of carbon dioxide equivalents (CO_2e), where each GHG is weighted by its global warming potential relative to carbon dioxide. In the U.S., carbon dioxide accounts for more than 82 percent of GHG emissions in all sectors except agriculture and is primarily due to the combustion of fossil fuels (U.S. Environmental Protection Agency [USEPA], 2017).

The CO2e emissions generated by the soil removal project are expected to be less than significant given that only 190 cubic yards of soil would be removed.

REFERENCES

Intergovernmental Panel on Climate Change (IPCC), 2013. *Climate Change 2013: The Physical Science Basis.*

United States Environmental Protection Agency (USEPA), 2017. *Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2015*, April 15.

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:

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 0.25-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 2 miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?

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

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

BACKGROUND

In California, the DTSC School Property Evaluation and Cleanup Division conducts oversight of hazardous materials investigation and remediation for many proposed new school sites and school redevelopment projects. All proposed school projects that will receive state funding for acquisition or

construction or that are large enough to be considered a "project" under CEQA are required to go through a rigorous environmental review and cleanup process under DTSC's oversight. Through the environmental review process, DTSC ensures protection of children, staff, and the environment from the potential effects of exposure to hazardous materials.

On April 14, 2020, the District entered into an Environmental Oversight Agreement with DTSC to oversee environmental investigation activities associated with the previously approved multi-phased modernization of the project site. On June 30, 2020, the District submitted a Preliminary Environmental Assessment equivalent (PEA-e) Report to DTSC that identified elevated concentrations of organochlorine pesticides (OCPs) from termiticide applications and lead from lead-based paints in shallow soils around existing classroom buildings as contaminants of concern at the project site (Padre Associates, Inc., 2020a).

On September 15, 2020, the District submitted a Supplemental Site Investigation (SSI) Summary Report to DTSC that delineated the horizontal and vertical extent of OCPs and lead-impacted soil around existing buildings (Padre Associates, Inc., 2020b). Concentrations of dieldrin and lead in soil were reported up to 0.21 milligrams per kilogram (mg/kg) and 800 mg/kg, respectively, which exceed the DTSC's health-risk screening levels for residential soils. Based on a screening-level health risk assessment, the estimated excess cancer risk from exposure to OCPs in soil at the project site was 7.4 in a million, which exceeds the DTSC's recommended cancer risk threshold of 1 in a million. In addition, the exposure to lead in soil at the project site could result in a 90th percentile blood level concentration of 20.7 micrograms per deciliter (µg/dl), which exceeds DTSC's recommended blood toxicity threshold of 1 µg/dl. Based on these results, the SSI Summary Report concluded that a response action (RA) for dieldrin and lead-impacted soils around existing buildings was warranted.

On October 30, 2020, the District submitted a RAW to DTSC that includes a detailed engineering plan for the proposed RA remedy and the goals to be achieved by the RA (Padre Associates, Inc., 2020c). The proposed RA remedy is to excavate, transport, and dispose of dieldrin and lead-impacted soils at an appropriately permitted landfill. The cleanup goal is to reduce the health risks associated with exposure to elevated concentrations of dieldrin and lead in soil to below a cancer risk of 1 in a million and a hazard quotient for non-cancer health effects of 1.0. To achieve this cleanup goal, areas with soil containing concentrations of dieldrin or lead above DTSC's screening levels of 0.034 mg/kg and 80 mg/kg, respectively, would be excavated for off-site disposal. Confirmation soil samples would be collected from the bottom and side walls of each excavation trench and analyzed to verify that the cleanup goals are met. If needed, additional soil volume would be excavated until the cleanup goals are met. Based on the findings of the PEA-e and SSI, approximately 190 cubic yards (cy) of soil would need to be excavated from seven shallow trenches ranging from 1.5 to 2.0 feet deep in areas around classroom buildings B, D, and E to achieve the cleanup goals (see **Figure 3**).

Additional details from the RAW are discussed below to evaluate the significance of potential environmental impacts under CEQA. A copy of the RAW can be reviewed at the offices of the Winters Joint Unified School District and is posted on the District's website at the following address: https://www.wintersjusd.org.

IMPACT EVALUATION[2]

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact

Site cleanup activities would be completed in about 3 weeks. Due to existing regulations, along with the limited extent and temporary nature of project activities, impacts from routine transport, use, or disposal of hazardous materials would be less than significant. Workers who handle hazardous materials are required to adhere to health and safety requirements enforced by the federal Occupational Health and Safety Administration and California Division of Occupational Safety and Health. Hazardous materials must also be transported to and from the project site in accordance with Resource Conservation and Recovery Act (RCRA) and U.S. Department of Transportation regulations, and disposed of in accordance with RCRA regulations at a facility that is permitted to accept the waste. As a result, project impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

b) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact

The disturbance of soils with concentrations of dieldrin or lead above the cleanup goals established in the RAW could potentially pose a health risk to workers, the public, or the environment during RA activities if the soils are not properly managed. However, the RAW includes detailed soil management and safety protocols to minimize potential health risks to workers, the public, and environment. Protocols included in the RAW to implement the RA remedy include the following (Padre Associates, Inc., 2020c):

- The excavation and soil stockpile areas would be fenced off and would contain the appropriate signage to prevent any pedestrians and/or site visitors from entering.
- Community members would be informed prior to initiation of any removal activities.
- Excavation and soil staging areas would be controlled to avoid dust generation, using water as a dust suppressant.
- Air monitoring would be performed during RA activities in which contaminated soils are being handled or disturbed by measuring dust levels at one upwind location, two downwind locations, and one location within the active work zone.
- Perimeter fencing would be equipped with wind/dust/privacy screens for added off-site dust control.
- During non-excavation hours, the excavated soil stockpile(s) would be covered with plastic sheeting to prevent dust generation and/or runoff during rain events.

[2] The format for this section is slightly more detailed than for other topics of the Initial Study, given that hazards and hazardous materials are the main issue of concern associated with the soil removal project.

- The temporary on-site storage of excavated soil would be secured and properly labeled until the soil awaiting off-site transportation and disposal is ready for loading.
- Soil, debris, and dust would be removed from excavation equipment, transportation vehicles, and personnel before they leave the work zones.
- Prior to leaving the project site, all truck loads would be inspected to ensure that the truck exterior is clean and clear of excess soil and debris, and that each truck load is properly covered.

The project site air monitoring professional would monitor dust levels and have the authority to stop work in the event that on-site activities generate dust levels in excess of the dust action level (0.05 milligrams per cubic meter) at the downwind air monitoring locations. Additionally, dust control measures would be taken if visible dust emissions are observed from the point-of-origin. Generation of dust during the removal operations would be minimized as necessary with the use of water as a dust suppressant. The water would be available via a water truck or a metered discharge from a fire hydrant located proximate to the project site. The RA contractor would control dust generation by spraying water prior to daily work activities, during excavation/loading activities (as necessary to maintain dust concentrations below action levels), and at truck staging locations. Watering equipment would be continuously available to provide proper dust control.

The air monitoring professional would monitor on-site meteorological instrumentation and/or coordinate with off-site meteorological professionals to identify conditions that require cessation of work. If wind speeds become elevated, initially, the increased application of water suppressant (water) would be employed. If an uncontrollable condition occurs (e.g., exceeding dust action levels), all removal activities would cease, stockpiled soil(s) would be covered, and the excavation areas would be covered, if necessary. Work activities would not resume until conditions are stabilized or mitigation and/or effective engineering control measures are implemented, and conditions are found acceptable to proceed.

The stockpiled soil would be profiled for waste disposal prior to loading the soil bins and stockpiled soil into trucks to be transported, and properly disposed of at an approved landfill. Based on the analytical results gathered during the RAW, it is anticipated that the removed soil would be disposed of as non-hazardous waste.

Implementation of the RA activities in accordance with DTSC oversight and the RAW and would ensure that the project would have a less-than-significant impact related to the potential release of hazardous materials that could be present in the subsurface of the project site.

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

Less Than Significant Impact

See discussion of wind and dust issues under Item b above. The handling or emission of hazardous or acutely hazardous materials near schools must consider potential health effects on children, who are considered sensitive receptors. In addition to Winters High School, three additional schools—Wolfskill High School, Winters Middle School, and Winters Elementary School—are all located approximately

0.25 mile from the project site. The only plausible exposure pathway of concern for children at nearby schools is through the inhalation of air contaminants, such as particulate matter.

Sources of hazardous emissions during RA activities would include diesel particulate matter from the exhaust of construction equipment (e.g., excavator and loader). As discussed in Section III, Air Quality, however, the project is not expected to expose sensitive receptors to substantial pollutant concentrations, given the limited extent and temporary nature of construction activities. The project therefore would not pose a significant health risk to students on the Winters High School campus or at other nearby schools.

d) Would the project 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?

No Impact

The provisions of California Government Code Section 65962.5 require the State Water Resources Control Board, DTSC, California Department of Health Services, and California Department of Resources Recycling and Recovery to submit information to the California Environmental Protection Agency pertaining to sites that were associated with solid waste disposal, hazardous waste disposal, and/or hazardous materials releases. Additionally, other local agencies such as the Yolo County Environmental Health Department can act as a responsible agency to provide oversight of sites where the quality of groundwater or surface waters is threatened. The compilation of hazardous materials release sites that meet criteria specified in Government Code Section 65962.5 is known as the Cortese List. The PEA-e did not identify any hazardous materials release sites on the project site that meet the criteria for inclusion on the Cortese List. Therefore, the project would have no impact related to development on a hazardous materials release site included on the Cortese List.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact

The nearest public use airport, Yolo County Airport, is located approximately 7 miles northeast of the project site. The project site is not located within the airport safety restriction area (SACOG, 1999); therefore, construction equipment would not be considered a potential obstruction to aircraft that use the airport. The project would therefore have no impact on the navigable airspace of public use airports and would not result in a safety hazard.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact

The project would not alter the current emergency vehicle access, nor would it affect vehicle circulation at the project site. Therefore, the project would have a less-than-significant impact on the implementation of any emergency response and evacuation plans.

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

No Impact

The project site is surrounded by residential and commercial land uses and is not located in an area mapped as Moderate, High, or Very High Fire Hazard Severity Zone by the California Department of Forestry and Fire Protection (CAL FIRE, 2007). Therefore, the project would have no impact related to wildland fire hazards.

REFERENCES

California Department of Forestry and Fire Protection (CAL FIRE), 2007. Yolo County Draft Fire Hazard Severity Zones in LRA, October 5.

Padre Associates, Inc., 2020a. Preliminary Environmental Assessment – Equivalent Report, Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California, June 30.

Padre Associates, Inc., 2020b. Supplemental Site Investigation Summary Report, Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California (Site Code: 104819), September 15.

Padre Associates, Inc., 2020c. Removal Action Work Plan, Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California (Site Code 104819), October 30.

Sacramento Area Council of Governments (SACOG), 1999. Yolo County Airport Comprehensive Land Use Plan, October.

X. HYDROLOGY AND WATER QUALITY. Would the project:

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

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

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

(i) result in substantial erosion or siltation on- or off-site;

(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

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

(iv) impede or redirect flood flows?

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

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

IMPACT EVALUATION

Less Than Significant Impact

The project site is located in the Putah Creek Watershed. Putah Creek is located south of the project site and forms the boundary between Yolo and Solano Counties. Pursuant to Section 303(d) of the Clean Water Act, the State Water Resources Control Board (SWRCB) has listed Putah Creek as an impaired water body[3] due to mercury releases from historic gold mining. Water quality discharges to impaired water bodies in the project site vicinity are regulated by the National Pollutant Discharge Elimination System (NPDES) program with local oversight from the Central Valley Regional Water Quality Control Board (RWQCB). Under the NPDES program, the quality of stormwater runoff is regulated by stormwater permits that include requirements to prevent or reduce discharges of pollutants that cause or contribute to violations of water quality objectives for receiving waters.

During project activities, exposed soils and any chemicals spilled or leaked onto the ground may be entrained in stormwater runoff. Surface soils may be eroded by wind or water, resulting in adverse impacts on receiving waters. Construction activities (e.g., grading) in California that result in the disturbance of 1 or more acres are required to comply with the SWRCB's (2012) NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities, Order No. 2009-0009-DWQ (as amended by Order No. 2010-0014-DWQ and 2012-006-DWQ) (Construction General Permit). Due to the limited area affected by the soil removal project, a Storm Water Pollution Prevention Plan (SWPPP) would not be required (Padre Associates, Inc., 2020).

Although a SWPPP is not required for this project, best management practices (BMPs) would be implemented to reduce or prevent sediment and other pollutants from entering existing storm water drains located in adjacent streets. Depending on weather conditions at the time of soil removal activities, the following BMPs would be implemented as appropriate:

- Control of runoff from stockpiled soil by covering each pile with plastic sheeting and surrounding the stockpile with silt fencing and/or filter roll barriers;
- Temporary perimeter controls with silt fencing and/or filter roll barriers;
- Protection of storm drain inlets with filter fabric and sand/gravel bag barriers;

[3] An "impaired water body" is one that does not meet one or more of the water quality standards established by the state.

- Stabilized construction entrance/exit with truck tracking controls; and
- Post-construction erosion control measures (i.e., landscape and/or hardscape ground cover).

The soil removal project would not increase impervious surface area and no mitigation measures would be necessary.

REFERENCES

Padre Associates, Inc., 2020, Removal Action Work Plan: Winters High School Modernization Project, 101 Grant Avenue, Winters, Yolo County, California (Site Code 104819)

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XI. LAND USE AND PLANNING. Would the project:

a) Physically divide an established community?

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

IMPACT EVALUATION

Less Than Significant Impact

The project would not divide an established community or conflict with any land use plan, policy or regulation related to mitigating an environmental effect.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XII. MINERAL RESOURCES. Would the project:

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

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?

IMPACT EVALUATION

No Impact

No impact related to mineral resources would occur from the project. The project site has not been identified as a known mineral resource site.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XIII. NOISE. Would the project result in:

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

b) Generation of excessive ground borne vibration or ground borne noise levels?

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels?

BACKGROUND

The primary source of noise in the vicinity of the project site is traffic along major roadways near the project site including traffic on Grant Avenue, which runs along the southern border of the project site; and traffic on Railroad Avenue, which runs east of the campus. Traffic on Hemenway Street, which runs along the western border of the project site, is likely audible at the school sports fields, but this street is a minor roadway and not a substantial source of noise relative to Grant Avenue and Railroad Avenue. Based on the projected noise levels for the year 2010 in the City of Winters General Plan, traffic noise levels along Grant Avenue are approximately 68 dBA L_{dn} 50 feet from the center line, and traffic noise levels along Railroad Avenue are approximately 61 dBA L_{dn} 50 feet from the center line (City of Winters, 1992). Outdoor high school activities, such as Physical Education classes and sports practices and games, are also sources of noise at the project site.

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would create temporary noise impacts, but the noise would be limited in duration, would occur during the spring break when students are not in attendance, and would not occur close to residences. The project would not use equipment likely to cause significant vibration.

Given the short duration of soil removal, the timing of the activity, and the location of the project, the noise impacts would be less than significant, and no mitigation measures are considered necessary. The project would have no impact related to groundborne vibration or groundborne noise.

The project site is located approximately 7 miles southwest of the nearest public use airport, Yolo County Airport. The project site is not located within the airport safety restriction area. In addition, the proposed project would not introduce new students, faculty, or staff to the project site. Therefore, the proposed project would not expose people in the project area to excessive noise from any public use airport.

REFERENCES

City of Winters, 1992. Draft Environmental Impact Report, Draft General Plan, State Clearinghouse #91073080. October 21.

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XIV. POPULATION AND HOUSING. Would the project:

a) Induce substantial unplanned 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 people or housing, necessitating the construction of replacement housing elsewhere?

IMPACT EVALUATION

No Impact

The project would have no impact related to inducing unplanned population growth and displacing people or housing. The project would not introduce new students, faculty, or staff to the project site and would not displace any people or housing.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XV. PUBLIC SERVICES. Would the project:

a) 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:

Fire protection?

Police protection?

Schools?

Parks?

Other public facilities?

IMPACT EVALUATION

No Impact

No new or altered governmental facilities for fire protection, police, schools, parks, or other public services would be required for the project. The project would involve temporary construction activities. Thus, the project would not create any impacts related to public services.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XVI. RECREATION.

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

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

IMPACT EVALUATION

No Impact

The soil removal project would not introduce new students, faculty, or staff to the project site and does not include recreational facilities. Therefore, no impacts related to increased use of recreational facilities or construction of recreational facilities would occur with the soil removal project.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XVII. TRANSPORTATION. Would the project:

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

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

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

d) Result in inadequate emergency access?

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would require 16 truck trips for off-haul of contaminated soil. This small number of trips would not have significant transportation impacts related to any of the above significance criteria. Emergency access would continue to be maintained across the campus and trucks associated with soil removal would not create traffic hazards. Current significance criteria relate to vehicle miles traveled (VMT). Construction activities for the soil removal project would not generate any long-term trips that would add significantly to VMT.

The soil removal project would not create any significant transportation impacts and no mitigation measures would be required.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XVIII. TRIBAL CULTURAL RESOURCES.

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

   i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or,

   ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

IMPACT EVALUATION

Less Than Significant Impact

Tribal consultation is addressed in Section 11 on page 7 of this Initial Study. Cultural resources impacts and mitigation measures are addressed in Section V, Cultural Resources, above.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

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

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

c) Result in 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?

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

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

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would not have impacts related to water, wastewater, electric power, natural gas or telecommunication facilities. Stormwater drainage best management practices (BMPs) would be used, as mentioned in Section X, Hydrology and Water Quality. The project would entail short-term construction activities that would not require significant amounts or water or power, and would not generate significant amounts of wastewater.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

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

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

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?

IMPACT EVALUATION

Less Than Significant Impact

The soil removal project would not impair an emergency response or evacuation plan, or exacerbate wildfire risks. The project site is not located in or near a fire hazard zone mapped by the California Department of Forestry and Fire Protection.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

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

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means 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?

IMPACT EVALUATION

Less Than Significant with Mitigation Incorporated

No significant impacts would occur as related to biological resources. Impacts on cultural resources would be less than significant with the mitigation measures identified in Section V, Cultural Resources, of this IS/MND.

The campus projects most likely to contribute to cumulative impacts are those already addressed in the 2018 Initial Study/Mitigated Negative Declaration and the 2020 Notice of Exemption. The 2018 Initial Study/Mitigated Negative Declaration identified mitigation measures that the Winters Joint Unified School District is required to implement in accordance with the Mitigation Monitoring and Reporting Program (MMRP) adopted at the time the 2018 Initial Study/Mitigated Negative Declaration was approved. The combination of these earlier mitigation measures and the mitigation measures identified in this IS/MND would eliminate the potential for significant cumulative impacts resulting from the soil removal project.

The project would not result in substantial adverse effects on human beings, either directly or indirectly.

REFERENCES

Winters Joint Unified School District (WJUSD), 2018. Initial Study/Mitigated Negative Declaration for Winters High School Measure R and Measure D Improvements, January.

APPENDIX A
MITIGATION MEASURES TO BE INCORPORATED INTO PROJECT

Mitigation Measure CULTURAL-1a: An archaeologist shall monitor project ground disturbance associated with the soil removal project. Monitoring shall continue at this location for up to ten 8-hour construction days during which project ground disturbance is occurring. After this period of monitoring, archaeological monitoring shall occur on an as-needed basis and Mitigation Measure CULTURAL-1b shall apply. The archaeological monitoring shall be overseen by an archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards for Archaeology.

Should an archaeological deposit be encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and the on-site archaeologist shall assess the deposit, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. The Winters Joint Unified School District shall be notified by the construction contractor within 24 hours of the encounter. If the deposit is found to be significant by the on-site archaeologist (i.e., eligible for listing in the California Register of Historical Resources), the District shall be responsible for funding and overseeing implementation of appropriate mitigation measures. Mitigation measures may include, but would not be limited to, recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate local curation facility and used for future research and public interpretive displays, as appropriate.

Mitigation Measure CULTURAL-1b: Should an archaeological deposit be encountered during project subsurface construction activities when an archaeological monitor is not on-site, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the California Register of Historical Resources), the District shall be responsible for funding and implementing appropriate mitigation measures. Mitigation measures may include recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate local curation facility and used for future research and public interpretive displays, as appropriate.

With implementation of the above mitigation measures, the potential impact on historic-period archaeological deposits would be reduced to a less-than-significant level. (LTS)

Mitigation Measure CULTURAL-2: A qualified paleontologist shall be retained to monitor project ground-disturbing activities associated with the soil removal project. Paleontological monitoring shall be done for up to ten 8-hour construction days during which project ground disturbance is occurring. After this period, paleontological monitoring shall occur on an as-needed basis. Paleontological monitors shall be empowered to halt construction activities at the location of the discovery to review possible paleontological materials and to protect the resource while the finds are being evaluated. Samples of matrix may be collected, as appropriate, for processing, sorting, and microscopic examination to determine if fossils are present. Monitoring shall continue until, in the paleontologist's judgment, fossils are not likely to be encountered.

If paleontological resources are discovered during project activities, all work within 25 feet of the discovery shall be redirected. The Winters Joint Unified School District shall contact a qualified paleontologist—if a paleontological monitor is not on-site—to assess the situation, determine whether the paleontological resources are considered significant, and, if so, make recommendations regarding their treatment. Adverse effects on paleontological resources shall be avoided by project activities to the extent feasible. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance. Paleontological resources are considered significant if they possess the possibility of providing new information regarding past life forms, paleoecology, stratigraphy, and geological formation processes. If the resources are not significant, mitigation is not necessary. If the resources are significant, adverse effects on the resource shall be mitigated. Mitigation may include recordation of the fossil locality, data recovery and analysis, a technical data recovery report, and accessioning of the fossil material and technical report to a paleontological repository. Public educational outreach may also be appropriate.

Upon completion of the paleontological monitoring, a report of findings with an appended, itemized inventory of specimens, as appropriate, shall be prepared and submitted to an appropriate repository, such as the University of California Museum of Paleontology. (LTS)