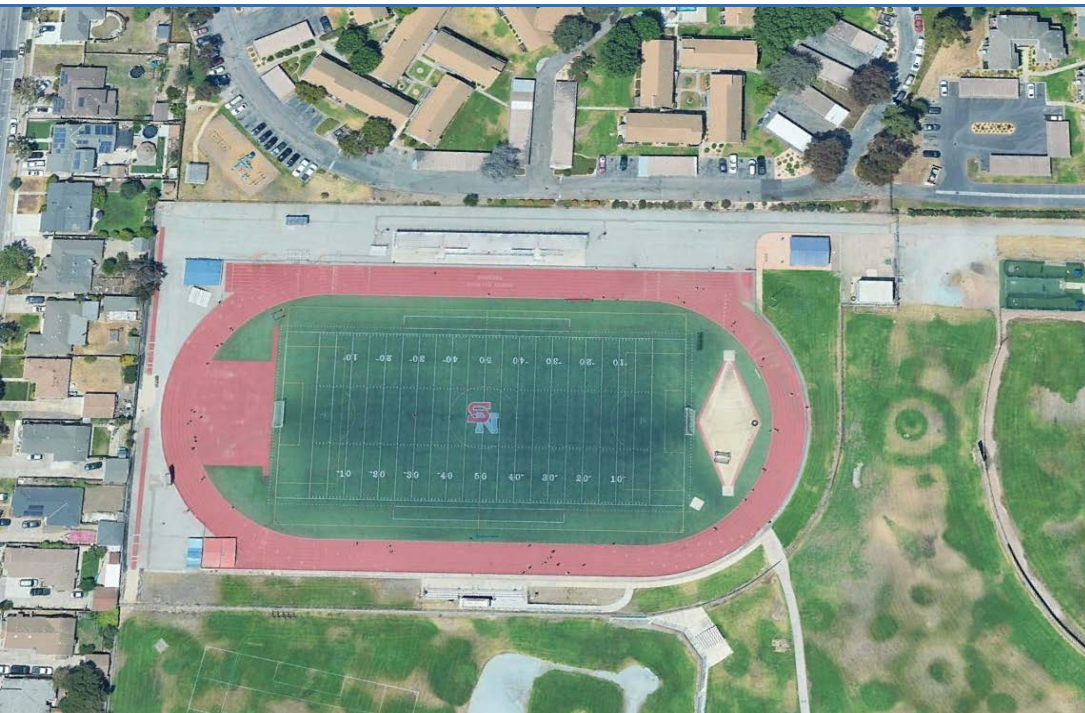


Public Review
Initial Study/Mitigated Negative Declaration

North Salinas High School Stadium Improvements

Salinas Union High School District

September 16, 2024



Prepared by
EMC Planning Group

PROPOSED MITIGATED NEGATIVE DECLARATION

NORTH SALINAS HIGH SCHOOL
STADIUM IMPROVEMENTS
SALINAS UNION HIGH SCHOOL DISTRICT

PREPARED FOR

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September 16, 2024

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PROPOSED MITIGATED NEGATIVE DECLARATION

In Compliance with the California Environmental Quality Act (CEQA)

Project Name	North Salinas High School Stadium Improvements
Lead Agency	Salinas Union High School District
Project Proponent	Salinas Union High School District
Project Location	North Salinas High School, 55 Kip Drive, Salinas, CA 93906
Project Description	The Salinas Union High School District proposes to make the following improvements to the existing stadium at North Salinas High School: four (4) lighting poles (two 90-foot-tall; two 80-foot-tall); increase permanent seating at the existing stadium by 298 seats for the home seating area for a total of 1,548 available home seats; egress lighting along pedestrian pathways; electrical trenching under existing concrete pathway; new public access system; lighting in existing parking area; stormwater infrastructure improvements; renovations to existing restrooms; drinking fountain improvements; new football goal posts; new 8x36 foot press box on bleachers; and various accessibility improvements in and around the stadium.
Public Review Period	September 20, 2024 to October 21, 2024
Written Comments To	Edgar Esquivel, Director of General Services Salinas Union High School District 320 Rose Street Salinas, CA 93901 edgar.esquivel@salinasuhd.org
Proposed Findings	The Salinas Union High School District is the custodian of the documents and other material that constitute the record of proceedings upon which this decision is based. The initial study indicates that the proposed project has the potential to result in significant adverse environmental impacts. However, the mitigation measures identified in the initial study would reduce the impacts to a less than significant level. There is no substantial evidence, in light of the whole record before the lead agency Salinas Union High School District that the project, with mitigation measures incorporated, may have a significant effect on the environment. See the following project-specific mitigation measures:

Mitigation Measures

Cultural Resources

- CR-1 Prior to initiation of any ground disturbing activities, the school district shall retain a tribal monitor to be on-site for all ground disturbing work associated with the proposed project. In addition, the retained tribal monitor shall conduct a Tribal Cultural Resources Sensitivity Training with all project personnel prior to any ground disturbance.
- CR-2 In the event that archaeological resources are encountered during ground disturbing activities, the contractor shall temporarily halt or divert excavations within a 50-meter (165 feet) perimeter of the find until it can be evaluated. All potentially significant archaeological deposits shall be evaluated to demonstrate whether the resource is eligible for inclusion on the California Register of Historic Resources, even if discovered during construction. If archaeological deposits are encountered, they will be evaluated and mitigated simultaneously in the timeliest manner practicable, allowing for recovery of materials and data by standard archaeological procedures. For prehistoric archaeological sites, this data recovery involves the hand-excavated recovery and non-destructive analysis of a small sample of the deposit. Historic resources shall also be sampled through hand excavation, though architectural features may require careful mechanical exposure and hand excavation.

Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance by a qualified Archaeologist. Significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites.

- CR-3 In the event that human remains (or remains that may be human) are discovered at the project site, Public Resource Code Section 5097.98 must be followed. All grading or earthmoving activities shall immediately stop within 50 meters (165 feet) of the find. The Monterey County Coroner will be notified immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (Public Resource Code [PRC] § 5097). The coroner shall contact the Native American Heritage Commission (NAHC) to determine the most likely descendant(s) (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD will determine the most appropriate means of treating the human remains and associated grave artifacts, and shall oversee the

disposition of the remains. In the event the NAHC is unable to identify an MLD or the MLD fails to make a recommendation within 48 hours after being granted access to the site, the landowner or his/her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity within the project area in a location not subject to further subsurface disturbance if: a) the Native American Heritage Commission is unable to identify the MLD or the MLD failed to make a recommendation within 48 hours after being allowed access to the site; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

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INITIAL STUDY

**NORTH SALINAS HIGH SCHOOL
STADIUM IMPROVEMENTS
SALINAS UNION HIGH SCHOOL DISTRICT**

PREPARED FOR

Lozano Smith

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September 16, 2024

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TABLE OF CONTENTS

A.	BACKGROUND.....	1
B.	ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED.....	26
C.	DETERMINATION.....	27
D.	EVALUATION OF ENVIRONMENTAL IMPACTS	28
1.	Aesthetics	29
2.	Agriculture and Forest Resources.....	77
3.	Air Quality.....	79
4.	Biological Resources	83
5.	Cultural Resources	86
6.	Energy.....	89
7.	Geology and Soils	91
8.	Greenhouse Gas Emissions	93
9.	Hazards and Hazardous Materials.....	95
10.	Hydrology and Water Quality	97
11.	Land Use and Planning	99
12.	Mineral Resources.....	100
13.	Noise.....	101
14.	Population and Housing.....	104
15.	Public Services.....	105
16.	Recreation	106
17.	Transportation.....	107
18.	Tribal Cultural Resources	110
19.	Utilities and Service Systems	112
20.	Wildfire	114
21.	Mandatory Findings of Significance.....	115
E.	SOURCES.....	117

Appendices

Appendix A	Project Plans
Appendix B	Musco Lighting Plans
Appendix C	Visual Simluations
Appendix D	Environmental Noise Assessment
Appendix E	Vehicle Miles Traveled (VMT) Assessment Memorandum

Figures

Figure 1	Regional Location Map.....	7
Figure 2	Aerial Photograph.....	9
Figure 3	Site Photographs.....	11
Figure 4	Overall Site Plan	13
Figure 5	Lighting Pole Elevations (Locations F1 & F2)	15
Figure 6	Lighting Pole Elevations (Locations F3 & F4)	17
Figure 7	Home Bleachers – Section View and Seating Layout	19
Figure 8	Viewshed Analysis and KOP Locations Map	31
Figure 9a	KOP-1 – E. Alvin Drive (Daytime Existing)	35
Figure 9b	KOP-1 – E. Alvin Drive (Daytime Proposed).....	37
Figure 10a	KOP-2 – Block Avenue (Daytime Existing)	39
Figure 10b	KOP-2 – Block Avenue (Daytime Proposed).....	41
Figure 11a	KOP-3 – Dororo Drive (Daytime Existing)	43
Figure 11b	KOP-3 – Dororo Drive (Daytime Proposed).....	45
Figure 12a	KOP-4 – Chaparral Street (Daytime Existing).....	47
Figure 12b	KOP-4 – Chaparral Street (Daytime Proposed)	49
Figure 13a	KOP-1 – E. Alvin Drive (Nighttime Existing)	55
Figure 13b	KOP-1 – E. Alvin Drive (Nighttime Proposed).....	57
Figure 14a	KOP-2 – Block Avenue (Nighttime Existing)	59
Figure 14b	KOP-2 – Block Avenue (Nighttime Proposed).....	61
Figure 15a	KOP-3 – Dororo Drive (Nighttime Existing)	63
Figure 15b	KOP-3 – Dororo Drive (Nighttime Proposed)	65
Figure 16a	KOP-4 – Chaparral Street (Nighttime Existing).....	67
Figure 16b	KOP-4 – Chaparral Street (Nighttime Proposed)	69
Figure 17	Foot-Candle Measurement Summary – Football Field.....	71

Figure 18	Foot-Candle Measurement Summary – Track.....	73
Figure 19	Foot-Candle Measurement Summary – Edge of Campus and Near Residential Receptors.....	75

Tables

Table 1	Existing Schedule of North Salinas High School Stadium Uses.....	3
Table 2	Proposed Schedule of Stadium Uses (After Installation of Stadium Improvements)	21
Table 3	Stadium Field Lights Light Measurement Summary.....	53
Table 4	Thresholds of Significance for Criteria Air Pollutants.....	80

A. BACKGROUND

Project Title	North Salinas High School Stadium Improvements
Lead Agency Contact Person and Phone Number	Edgar Esquivel, Director of General Services Salinas Union High School District 831-796-7074
Date Prepared	September 2024
Study Prepared by	EMC Planning Group Inc. 601 Abrego Street Monterey, CA 93940
Project Location	North Salinas High School 55 Kip Drive Salinas, CA 93906
Project Sponsor Name and Address	Salinas Union High School District 431 W. Alisal Street Salinas, CA 93901
General Plan Designation	Public/Semipublic (2002 <i>City of Salinas General Plan</i>)
Zoning	Public/Semipublic (PS) (City of Salinas Zoning)

Setting

North Salinas High School (high school), located at 55 Kip Drive in the city of Salinas, is one of several high schools in the Salinas Union High School District (school district). The approximate 38-acre high school campus is surrounded by East Alvin Drive, apartments, Harden Middle School, and places of worship to the north; a single-family residential neighborhood to the south; Kip Drive, a place of worship, and a single-family residential neighborhood to the east, and multi-family residential neighborhoods to the west. Further to the west along the commercially-oriented North Main Street is (from north to south) an office park which includes employment training college campus (Central Coast College), a satellite campus for California State University, Monterey Bay, a public library (El Gabilan Library), and a small produce market. The high school campus is accessed via five (5) total parking lots with four separate lots reserved for students along E. Alvin Drive totaling 343 parking stalls and one for teachers and staff along Kip Drive totaling 65 parking stalls.

The high school's football field, track and stadium (also known as the Marv Beguhl Sports Complex) is located in the southwest corner of the high school campus, immediately adjacent to multi-family residential development (known as the Pointe at Northridge) to the west and single-family residences to the south (along Chaparral Street). The existing stadium facilities feature home and visitor bleachers totaling approximately 1,250 seats, a rubberized track, artificial turf playfield, storage sheds at the southeast and southwest corner of the stadium site, a restroom facility at the northwest corner of the stadium site, and a digital scoreboard that sits along the southeast edge of the track (along the southern campus boundary fence-line). The field is currently lit for nighttime practices (Monday through Friday during daylight savings time or November to March) by portable, diesel-operated, 25-foot-high field lights. The portable field lights have been in use since 2022.

[Figure 1, Regional Location Map](#), presents the regional location of the project site. [Figure 2, Aerial Photograph](#), presents an aerial of the project site and its surrounding land uses. [Figure 3, Site Photographs](#), illustrates the existing setting of the stadium site.

Existing Schedule of Stadium Uses

[Table 1, Existing Schedule of North Salinas High School Stadium Uses](#), on the following page, presents a breakdown of the schedule for sports teams that utilized the existing stadium in its current physical configuration from the 2022-2023 school year.

Existing Off-Site Practices and Games

Both the varsity and junior varsity football teams currently play home football games at Rabobank Stadium at the Salinas Sports Complex, approximately 0.60 miles south of the high school campus. The seating configuration at Rabobank Stadium features 3,500 seats on the home side and the visitor's side has seating capacity for 1,500 for a total capacity of 5,000 (California Rodeo Association 2023). The combined boys and girls cross-country team are the only other school-sponsored teams that hold meets off-campus. All cross-country meets are held off-campus at Toro Park. However, the cross-country team does hold practices at the stadium once or twice a week.

Description of Project

Stadium Improvements

The school district proposes to make the following improvements to the existing stadium. [Figure 4, Overall Site Plan](#), presents the location of these proposed improvements. A full set of project plans (60 percent construction drawings) are included in [Appendix A](#).

Table 1 Existing Schedule of North Salinas High School Stadium Uses

Days of the Week	Timing (Practices)		Timing (Games/Meet)		Approx. Number of Participants (Student-Athletes, Coaches, and Staff)	Number of Practices per Week (at Stadium)	Home Games/Meets per Year (at Stadium)
	Start	End	Start	End			
Fall Sports (August to November)							
Cross Country (Boys & Girls)							
All except Sunday	3:45 P.M.	6:00 P.M.			50 (Meets are all off-campus)	1-2	0 on-campus
Field Hockey (Girls) - Varsity							
All except Sunday	3:45 P.M.	6:00 P.M.	4:00 P.M.	7:00 P.M.	25	5-6 (coordinate with football team)	10
Field Hockey (Girls) – Junior Varsity							
All except Sunday	3:45 P.M.	6:00 P.M.	4:00 P.M.	7:00 P.M.	25	5-6 (coordinate with football team)	10
Football – Varsity ¹							
All except (Sunday)	3:45 P.M.	6:00 P.M.	7:30 P.M.	10:00 P.M.	75 (games held at Rabobank Stadium)	5-6 (coordinate with field hockey)	0 on-campus
Football – Junior Varsity ¹							
All except Sunday	3:45 P.M.	6:00 P.M.	5:00 P.M.	7:00 P.M.	75 (games held at Rabobank Stadium)	5-6 coordinate with varsity football)	0 on-campus
Winter Sports (November to February)							
Soccer (Boys) - Varsity							
All except Sunday	3:45 P.M.	6:00 P.M.	3:30 P.M.	5:15 P.M.	30	5-6	10
Soccer (Boys) – Junior Varsity							
All except Sunday	3:45 P.M.	6:00 P.M.	3:30 P.M.	5:15 P.M.	30	0 (practices held on-campus at separate practice field)	10
Soccer (Girls) - Varsity							
All except Sunday	3:45 P.M.	6:00 P.M.	3:30 P.M.	5:15 P.M.	30	5-6	10
Soccer (Girls) – Junior Varsity							
All except Sunday	3:45 P.M.	6:00 P.M.	3:30 P.M.	5:15 P.M.	30	0 (practices held on-campus at separate practice field)	10

Days of the Week	Timing (Practices)		Timing (Games/Meet)		Approx. Number of Participants (Student-Athletes, Coaches, and Staff)	Number of Practices per Week (at Stadium)	Home Games/Meets per Year (at Stadium)
	Start	End	Start	End			
Spring Sports (February to May)							
Track & Field (Boys)							
All except Sunday	3:45 P.M.	6:00 P.M.	3:30 P.M.	7:00 P.M.	50	5-6	5
Track & Field (Girls)							
All except Sunday	3:45 P.M.	6:00 P.M.	3:30 P.M.	7:00 P.M.	50	5-6	5
Total Practices (Range) & Games per Year						41-50 practices per year	70 games per year

SOURCE: SUHSD 2023

NOTE: 1. Existing home varsity and JV football games are held at Rabobank Stadium at the Salinas Sports Complex approximately 0.60 miles south of the high school campus.

Stadium Field Lights

The school district is proposing to install field lighting at the existing stadium and football field. The new field lighting will consist of four (4) lighting poles with the following design details:

- Two (2) 90-foot-tall light poles located on the eastern edge of the stadium next to the new home bleachers (and identified as F1 and F2). The F1 and F2 light poles will feature additional field and safety lighting mounted at 70-feet and 25-feet on each pole; and
- Two (2) 80-foot-tall light poles located on the western edge of the stadium next to the existing visitor bleachers (and identified as F3 and F4). The F3 and F4 light poles will feature additional field and safety lighting mounted at 70-feet and 15.5-feet on each pole.

Two of the lighting poles (Locations F1 and F2) will be located behind the western, home seating area and will extend 90-feet high. Two of the lighting poles (Location F3 and F4) will be located behind the eastern, visitor seating area and will extend 80-feet high. Each pole will be on a pre-cast concrete base approximately 10 feet below ground. Each lighting pole will feature three separate luminaires. Mounting heights for the three luminaires are 25 feet, 70 feet, and 90 feet (Locations F1 and F2) and 16 feet, 70 feet, and 80 feet (Locations F3 and F4), respectively. The four new lighting poles will result in a total of 44 luminaires with a total kilowatt (kW) load of 51.96. A complete set of lighting data associated with the North Salinas High School Stadium light designs, prepared by Musco Sports Lighting, is included as part of [Appendix B](#).

[Figure 5, Lighting Pole Elevations \(Locations F1 & F2\)](#), provides a lighting pole configuration drawing for the 90-foot light structures (Locations F1 and F2). [Figure 6, Lighting Pole Elevations \(Locations F3 & F4\)](#), provides a lighting pole configuration drawing for the 80-foot light structures (Locations F3 and F4).

Renovated/Replaced Spectator Seating

The school district plans to increase permanent seating by 298 seats by replacing the existing stadium seating for only the home seating area, which currently accommodates up to 1,250 spectators. Proposed upgraded bleacher facilities at the existing stadium site would accommodate up to 1,548 seats for the east-facing home bleachers. No additional seats will be added to the visitor bleacher area. Additional spectators may be accommodated by standing and/or individual portable chairs. [Figure 7, Home Bleachers – Section View and Seating Layout](#), presents the proposed home bleachers design.

Additional Stadium Improvements

In addition to new stadium lighting and replaced spectator seating, the following improvements are proposed at the North Salinas High School Stadium site:

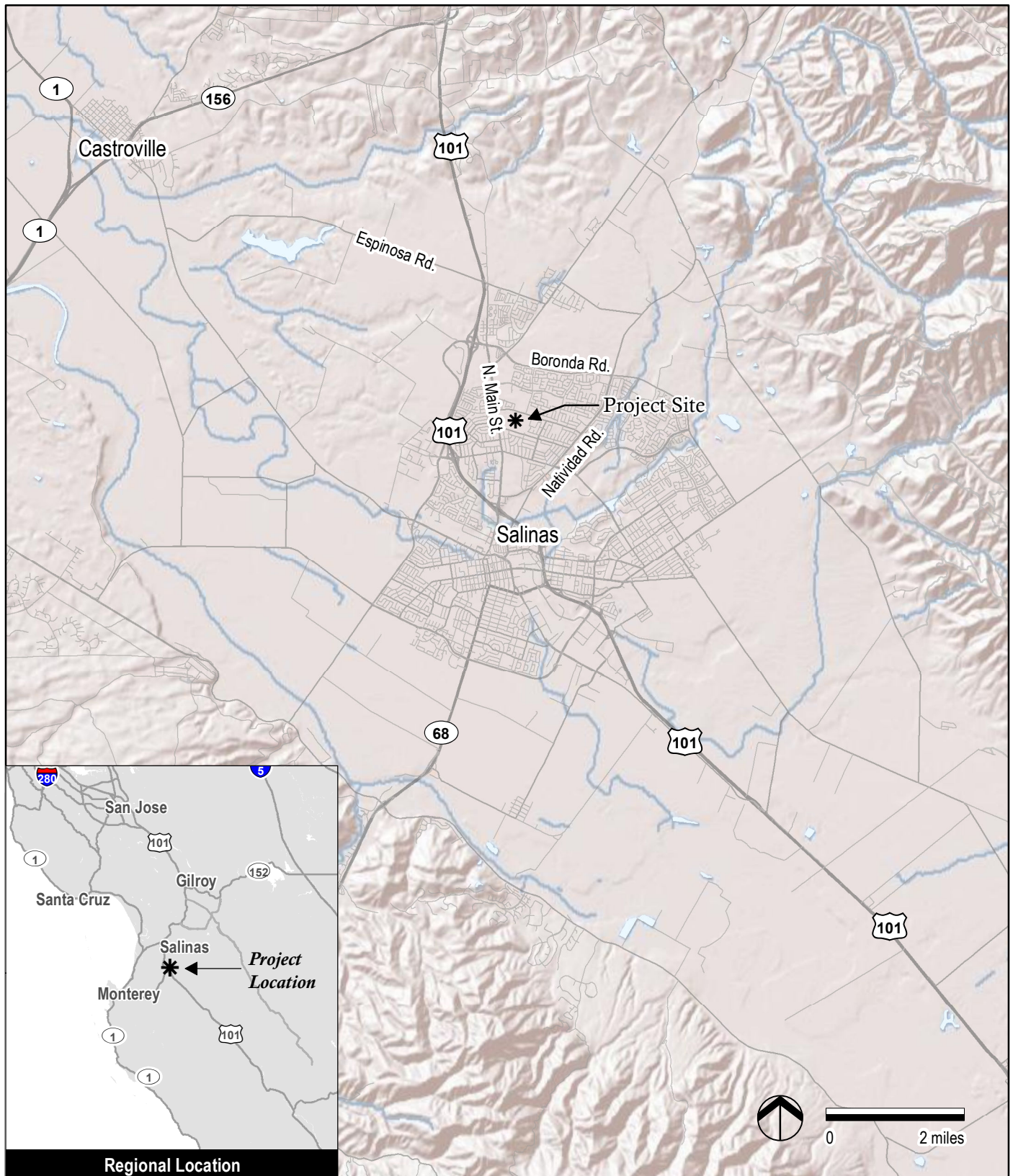
- Egress lighting along the existing pedestrian pathway which follows the western boundary of the campus from the on-campus parking lot along E. Alvin Drive;
- Electrical trenching underneath existing concrete paved pathway from E. Alvin Drive parking lot to stadium;
- A new Public Address (PA) system;
- Lighting of the existing parking area along E. Alvin Drive;
- Various improvements to existing stormwater infrastructure improvements including catch basins, concrete swales, etc.;
- Renovations to existing restroom facility located at northwest corner (entry area) to stadium site;
- Drinking fountain improvements throughout stadium;
- New football goal posts; and
- A new, 8-foot by 36-foot press box on top of the home side bleachers.

Stadium Accessibility Improvements

Various accessibility improvements are also proposed to improve access on and around the existing stadium site. These include:

- Removal and replacement of concrete paving around bleacher areas of stadium;
- Removal and replacement of asphalt concrete (AC) paving along edge of stadium site;
- Double entry (chain link) gate improvements at stadium entry and to access home bleachers;
- Single entry gate (chain link) improvements to access field and track; and
- New pathway lighting throughout stadium.

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Source: ESRI 2014

Figure 1

Regional Location Map



North Salinas High School Stadium Improvements Initial Study

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0 500 feet



Project Site

Source: ESRI 2016, Google Earth 2023,
Monterey County GIS 2023

Figure 2

Aerial Photograph



North Salinas High School Stadium Improvements Initial Study

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① Looking south from northeastern corner of stadium site.



② Looking south from northern portion of stadium site.



③ Looking south from northwestern corner of stadium site along existing home bleachers.



Project Site

Source: Google Earth 2023
Photographs: EMC Planning Group 2023



④ Looking northeast from northwestern corner of stadium site showing existing restroom facility.



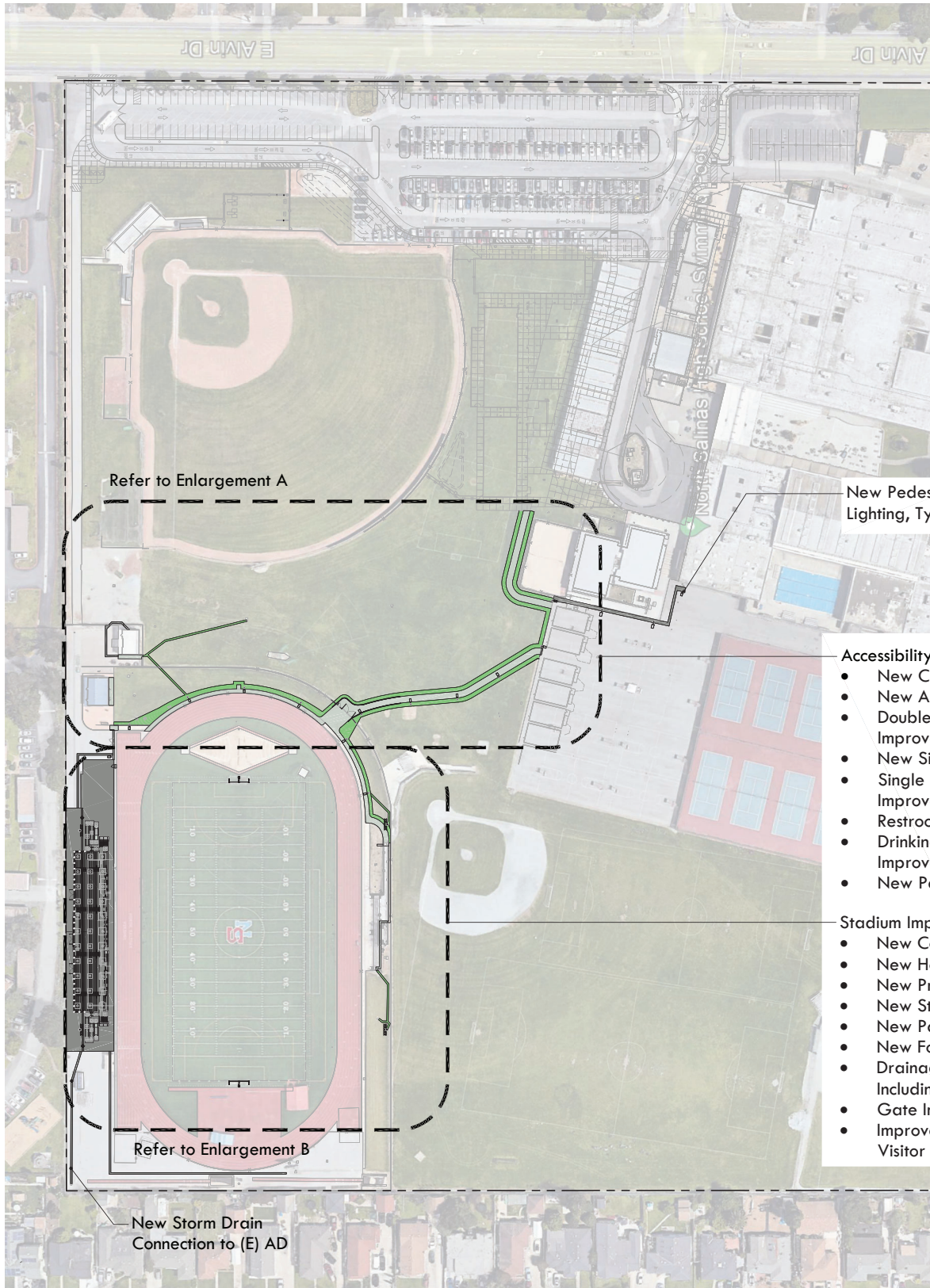
⑤ Looking southeast from northwestern corner of stadium site towards field and visitor bleachers.



⑥ Looking northeast from southeastern corner of stadium site near storage structures.

Figure 3
Site Photographs

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0 180 feet

MATERIAL LEGEND	
SYM	DESCRIPTION
	CONCRETE PAVING
	PROPOSED ASPHALT PAVING
	NATURAL SOD TURF FOR TRENCHING

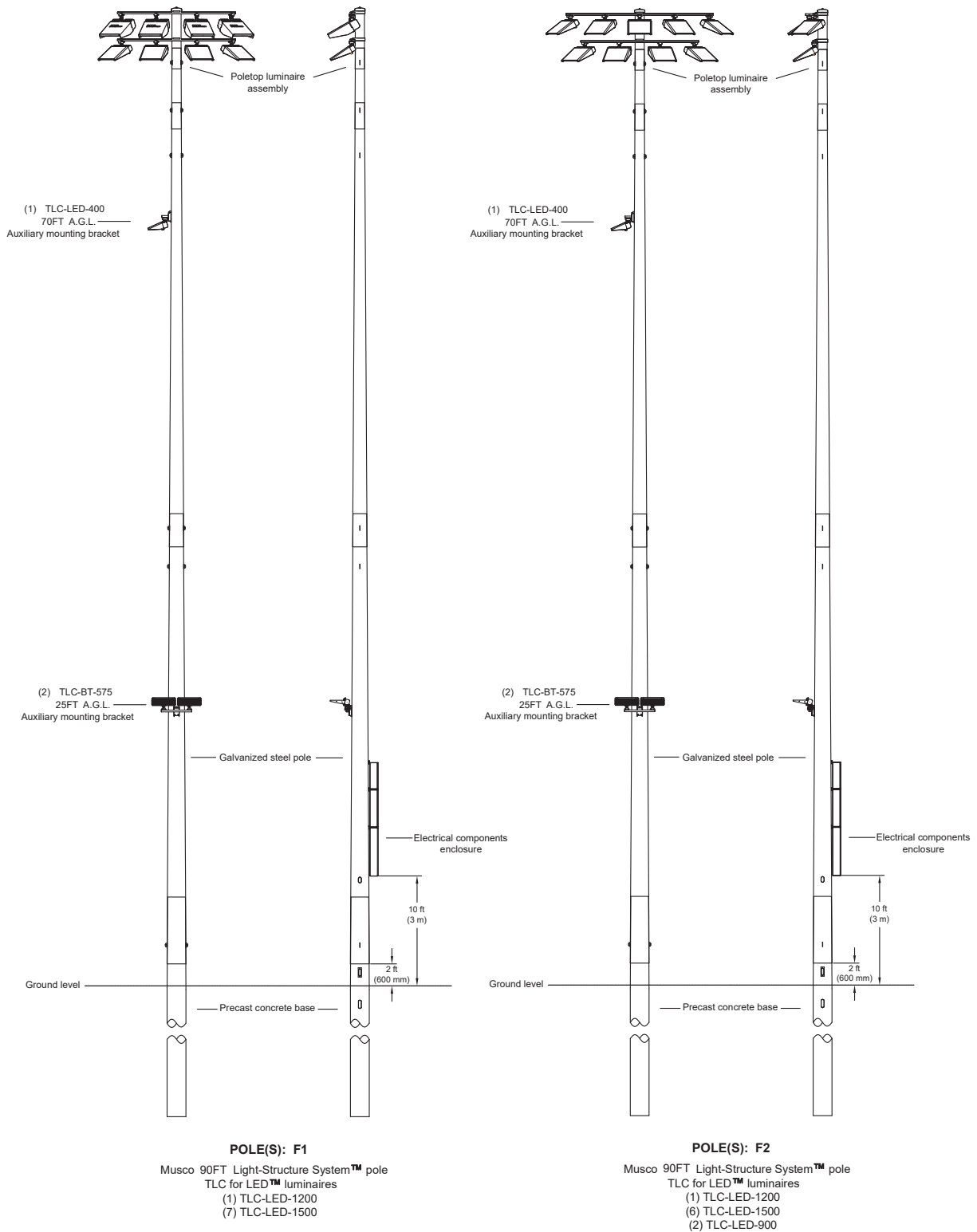
Source: Verde Design 2024

Figure 4

Overall Site Plan



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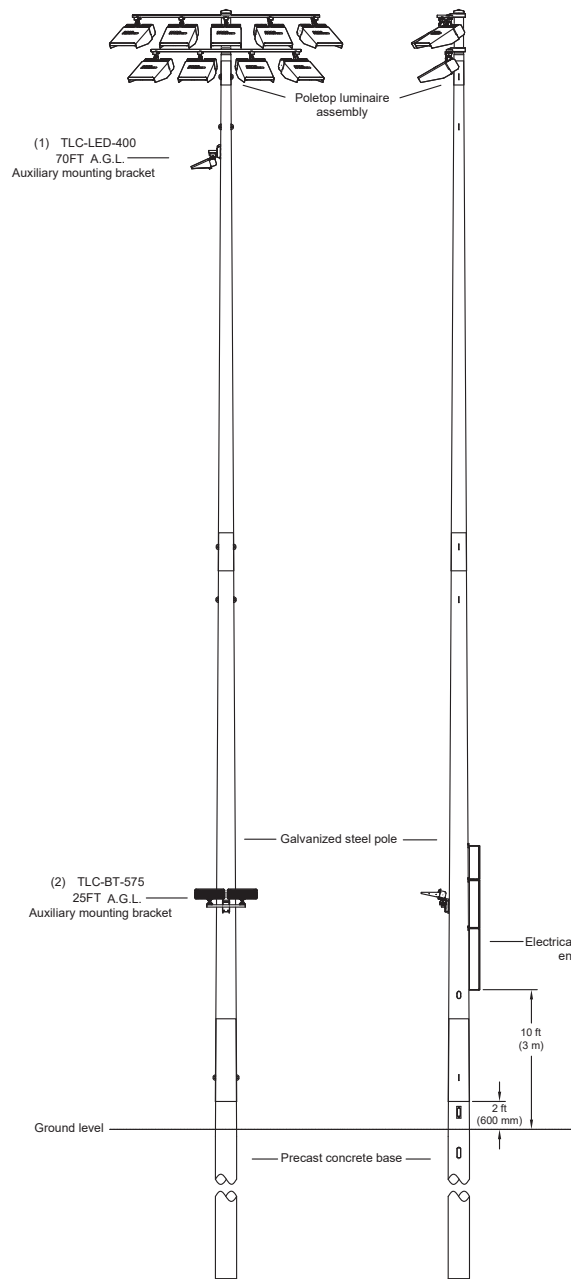
Source: Musco Lighting 2023

Figure 5

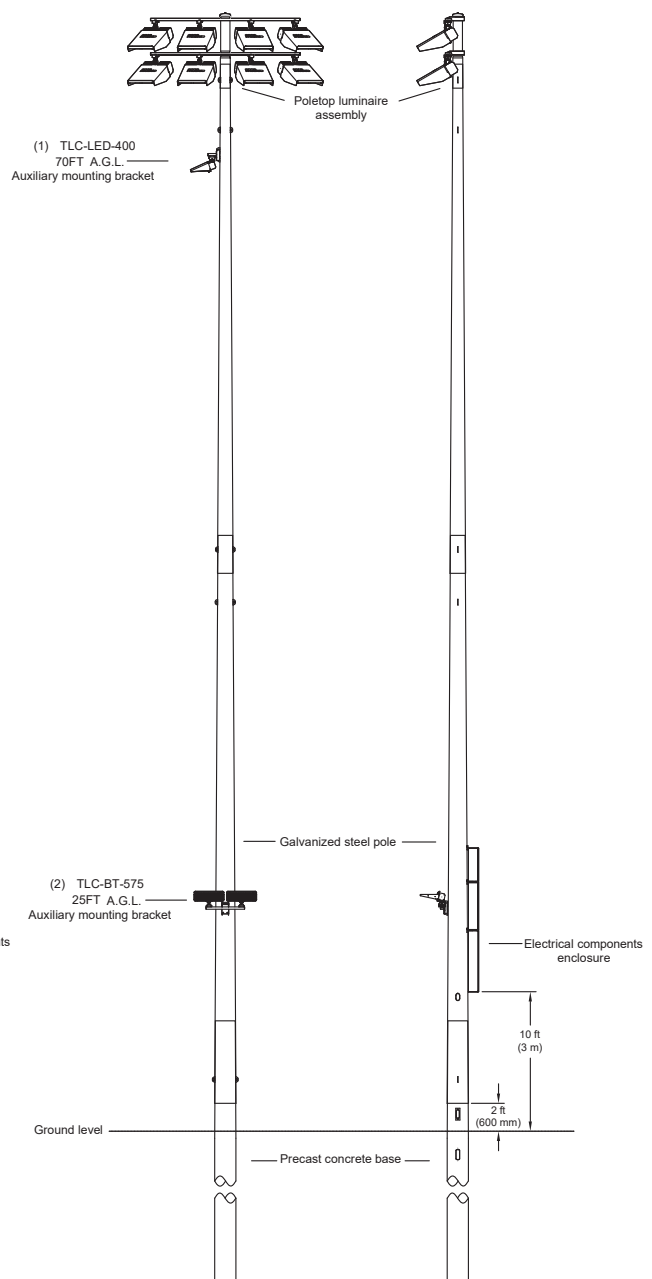
Light Pole Elevations (Locations F1 & F2)

North Salinas High School Stadium Improvements Initial Study

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POLE(S): F3
Musco 80FT Light-Structure System™ pole
TLC for LED™ luminaires
(7) TLC-LED-1500
(2) TLC-LED-900



POLE(S): F4
Musco 80FT Light-Structure System™ pole
TLC for LED™ luminaires
(8) TLC-LED-1500

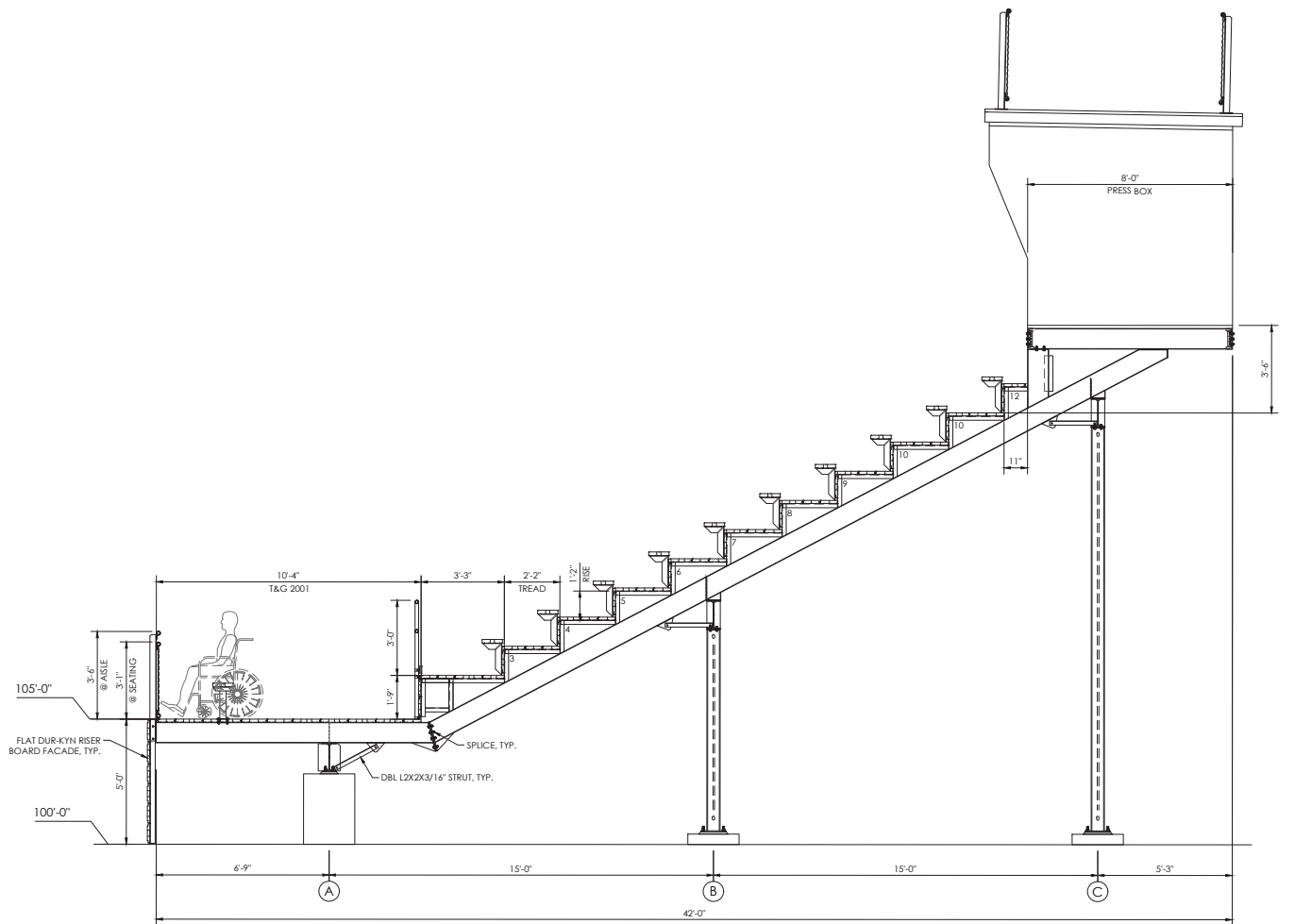
Source: Musco Lighting 2023

Figure 6

Light Pole Elevations (Locations F3 & F4)

North Salinas High School Stadium Improvements Initial Study

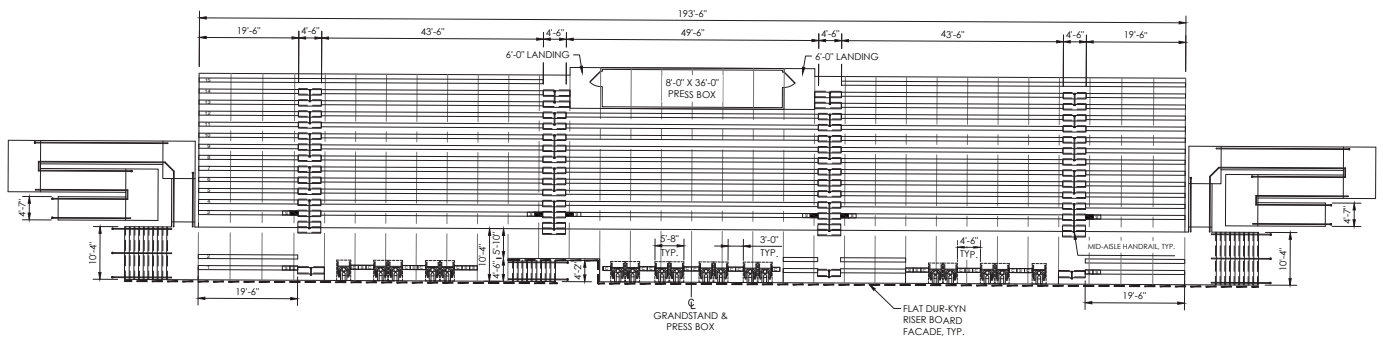
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SECTION VIEW @ PRESS BOX AREA

SCALE: 1/2"=1'-0"

HOME



SEAT COUNT - HOME	
18" BENCH SEATS	1488
34" WHEELCHAIR SPACES	16
36" WHEELCHAIR SPACES	2
18" COMPANION SEATS [C]	18
18" SEMI-AMBULANT SEATS [S]	18
18" AISLE SEATS	6
TOTAL SEAT COUNT	1548

SEATING LAYOUT

SCALE: 3/32"=1'-0"

Source: Southern Bleacher Company 2022

Figure 7

Home Bleachers - Section View and Seating Layout

North Salinas High School Stadium Improvements Initial Study

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Stadium Schedule of Uses

The following table, [Table 2, Proposed Schedule of Stadium Uses \(After Installation of Stadium Improvements\)](#), presents a proposed schedule of practices and games once the installation of stadium lights and other stadium improvements are implemented.

**Table 2 Proposed Schedule of Stadium Uses
(After Installation of Stadium Improvements)**

Days of the Week	Timing (Practices)		Timing (Games/Meet)		Approx. Number of Participants (Student-Athletes, Coaches, and Staff)	Estimated Number of Practices per Week (at Stadium)	Estimated Home Games/Meets per Year (at Stadium)
	Start	End	Start	End			
Fall Sports (August to November)							
Cross Country (Boys & Girls)							
All except Sunday	3:45 P.M.	6:00 P.M.			50	1-2	0
Field Hockey (Girls) - Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	5:45 P.M.	7:15 P.M.	25	5-6	10
Field Hockey (Girls) – Junior Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	4:00 P.M.	5:15 P.M.	25	5-6	10
Football - Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	7:30 P.M.	10:00 P.M.	75	5-6	5
Football – Junior Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	5:00 P.M.	7:00 P.M.	75	5-6	5
Winter Sports (November to February)							
Soccer (Boys) - Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	5:45 P.M.	7:15 P.M.	30	5-6	10
Soccer (Boys) – Junior Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	4:00 P.M.	5:15 P.M.	30	5-6	10
Soccer (Girls) - Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	5:45 P.M.	7:15 P.M.	30	5-6	10
Soccer (Girls) – Junior Varsity							
All except Sunday	3:45 P.M.	8:30 P.M.	4:00 P.M.	5:15 P.M.	30	5-6	10

Days of the Week	Timing (Practices)		Timing (Games/Meet)		Approx. Number of Participants (Student-Athletes, Coaches, and Staff)	Estimated Number of Practices per Week (at Stadium)	Estimated Home Games/Meets per Year (at Stadium)
	Start	End	Start	End			
Spring Sports (February to May)							
Track & Field (Boys)							
All except Sunday	3:45 P.M.	6:30 P.M.	3:30 P.M.	7:30 P.M.	50	5-6	5
Track & Field (Girls)							
All except Sunday	3:45 P.M.	6:30 P.M.	3:30 P.M.	7:30 P.M.	50	5-6	5
Total Practices (Range) & Games per Year						51-62 practices per year	80 games per year

SOURCE: SUHSD 2023

Attendance at High School Stadium

The estimated attendance for athletic competitions upon construction and installation of the proposed stadium improvements would vary by sport and other factors, such as level of competition (e.g., regular season vs. postseason) and weather conditions.

As described above, under existing conditions the highest attendance is typically for football games hosted at Rabobank Stadium, with up to 1,000 spectators for most football games, increasing to up to 2,000 spectators for a rivalry, playoff, or homecoming game. All varsity football games would have the ability to be hosted on the North Salinas High School campus on either Thursday, Friday, or Saturday evenings depending on officials' availability. There would be an increase in games only if the football team makes the playoffs and stadium capacity allows North Salinas High School to host a home playoff game. Additionally, an increase in number of spectators is expected by having the majority of games at night as opposed to afternoon events. The proposed stadium improvements, specifically the increased spectator seating capacity, at North Salinas High School are expected to increase attendance from 1,000 spectators to 1,500 spectators for most football games and from 2,000 spectators to 2,250 spectators for rivalry, playoff, or homecoming games, which are played in the fall.

Students Traveling Off-Site for Practices and Games

As previously noted, both the varsity and junior varsity football teams currently play home football games at Rabobank Stadium at the Salinas Sports Complex, approximately 0.60 miles south of the high school campus. With implementation of the proposed project, all football activities, including practices and games, would be moved on-campus. The combined boys and girls cross-country team would continue to hold meets off-campus. All cross-country meets are held off-campus. However, the cross-country team may hold practices at the stadium once or twice a week as they do currently.

Demolition and Construction Schedule and Details

Demolition Activities

Demolition would encompass removal of existing aggregate concrete (AC), concrete, and clearing of site grass. Excavation for bleacher footings would begin after site clearing. Construction personnel would then excavate 12 inches below proposed bleacher foundations and engineered fill would be placed and compacted. On areas to be paved they would place the specified depth of aggregate base and compact it followed by the specified paving layer, whether concrete or asphalt. Upon completion of excavation, fill and soil compaction forms are created and footings (bleachers, fencing, lights) are placed.

Upon completion of cut and fill activities, trenches would be excavated and subgrade utilities including drainage pipes and electrical lines would be placed and covered. Natural turf sod would be placed in disturbed soil areas followed by a 90-day maintenance period.

Construction Hours

Construction will take place per Salinas Noise Ordinance (Article XII, 5-12.03) which requires that construction activity noise be limited between the hours of 7:00 a.m. to 9:00 p.m. However, the school district will ensure that any construction work will occur from 7:00 am to 3:30 p.m. and would occur during school hours only.

Construction Equipment

Construction of the bleachers would require a forklift and reach lift. For the press box, the structure would be assembled off site and trucked onto the stadium site on a flat-bed trailer. A crane would be utilized to hoist and place the box.

For the light poles, construction personnel would use a drill rig to drill holes and a concrete truck to place the footings. Construction personnel would then use a fork lift/front loader to offload equipment. A crane would then be used to place the poles. A trenching machine could be used for the underground utilities. Asphalt will be compacted by rollers. Over excavation could be accomplished by a bulldozer or grader.

California Government Code Section 53094

As discussed further under each environmental topic addressed herein, the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable to a proposed school facility project pursuant to California Government Code Section 53094. Accordingly, although the proposed project does not conflict with any otherwise applicable local plans or zoning regulations, if the proposed project is approved, the school district's governing board adopted a resolution (No. 23-02) on August 22, 2023 exempting the North Salinas High School campus and the proposed project from any zoning ordinances or regulations of the City of Salinas, including without limitation, the City's General Plan, and any other related ordinances or regulations that otherwise would be applicable. In accordance with noticing requirements of Government Code 53094, the school district also notified the City of Salinas of this exemption action within ten (10) days of the school board's approval (the school

district verified notification was received by the City of Salinas on September 1, 2023). Regardless, this initial study evaluates the proposed project's consistency with local regulations and policies for the purposes of CEQA compliance, and because the school district strives to acknowledge and adhere to local policies and regulations to the extent feasible.

Other Public Agencies Whose Approval is Required

- Division of the State Architect (DSA) (Project Plans Approval)
- Monterey Bay Air Resources District (Authority to Construct and Permit to Operate)

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.?

On March 31, 2022, the school district sent an offer of consultation letter to the tribal representative of the Ohlone/Costanoan-Esselen Nation (OCEN), who had previously requested consultation with the Salinas Union High School District pursuant to Assembly Bill (AB) 52. The school district was able to verify the tribal representative received the offer via U.S. Postal Service Certified Mail on April 12, 2022. The school district did not receive a response letter and request for consultation from the tribe. However, due to changes in the project description, a follow-up letter was sent to the OCEN tribal representative on March 29, 2023. A confirmation of receipt by the representative was received by the school district via U.S. Postal Service Certified Mail dated April 4, 2023. As of September 16, 2024 the school district has not received a response from the tribal representative requesting consultation.

On March 30, 2023, EMC Planning Group staff archaeologist, Kaitlin Ruppert, RPA, sent outreach letters out to eleven tribal representatives in response to a positive Sacred Lands Records search provided by the Native American Heritage Commission (NAHC). On April 12, 2023, EMC Planning Group received an e-mail response from Kanyon Sayers-Roods, MLD Contact, of the Indian Canyon Band of Costanoan Ohlone expressing a desire for a tribal monitor and an archaeologist during all ground disturbing activities and recommended a cultural sensitivity training be held prior to any construction activities. However, the representative did not specifically request consultation with the school district pursuant to AB 52. Additionally, on May 5, 2023, EMC Planning Group received a response letter (via e-mail) from the Esselen Tribe of Monterey County, which in addition to responding to the archaeologist's outreach efforts, requested consultation with the school district pursuant to AB 52. On May 11, 2023, the school district sent an e-mail response offering to set-up a consultation meeting with the Esselen Tribe of Monterey County. On July 27, 2023, the school district received an acknowledgement of receipt response from the Esselen Tribe of Monterey County but no further response or request

for consultation has been received by the school district as of September 16, 2024. The results of this consultation process are reflected in the impact analysis and proposed mitigation as presented in Section D.5, Cultural Resources, and Section D.18, Tribal Cultural Resources, of this initial study.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

B. 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 | ☐ Greenhouse Gas Emissions | ☐ Public Services |
| ☐ Agriculture and Forestry Resources | ☐ Hazards & Hazardous Materials | ☐ Recreation |
| ☐ Air Quality | ☐ Hydrology/Water Quality | ☐ Transportation |
| ☐ Biological Resources | ☐ Land Use/Planning | ☐ Tribal Cultural Resources |
| ☐ Cultural Resources | ☐ Mineral Resources | ☐ Utilities/Service Systems |
| ☐ Energy | ☐ Noise | ☐ Wildfire |
| ☐ Geology/Soils | ☐ Population/Housing | ☐ Mandatory Findings of Significance |

C. DETERMINATION

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 (1) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (2) 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.

Edgar Esquivel
Director of General Services

Date

D. EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors, as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

1. AESTHETICS

Except as provided in Public Resources Code Section 21099 (Modernization of Transportation Analysis for Transit-Oriented Infill Projects), would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In 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?	☐	☐	☒	☐

Comments:

Approach to the Visual Analysis

This section evaluates whether the proposed project would result in significant impacts on aesthetic, or scenic, resources. The significance criteria above were used to evaluate the proposed project's effects on aesthetic resources relative to the existing baseline condition. The visual analysis is based on:

- Site investigations by the consultant team on February 6, 2023, February 8, 2023, and April 30, 2023;
- Evaluations of aerial (Google Earth) and ground-based photographs of the project site, locations therein where modifications are proposed, as well as the publicly accessible viewpoints of the project site from surrounding neighborhoods and roadways;
- Visual simulations prepared by visual consultant, 3DScape, of the proposed lights, light poles, and other stadium improvements within the context of existing and proposed daytime and nighttime conditions on and around the project site;
- Review of preliminary project plans and lighting design plans;
- Communications with school district staff and consultants regarding visual aspects of the proposed project; and
- Consideration of City of Salinas policies and guidelines related to visual resources.

Actions with long-term visual effects, such as construction of new stadium lighting poles and introducing new sources of nighttime light and daytime glare, can alter the landscape in a manner that could affect existing scenic resources and the visual character or quality of an area, depending on the perspective of the viewer and the visual sensitivity of an area.

Viewshed Analysis and Visual Simulations Methodology

The methodologies employed by 3DScape in generating the viewshed analysis and the visual simulations are described below. In addition, this methodology discussion is provided on the sheet entitled “Visual Simulation Methodology” included in the complete set of visual simulations prepared by 3DScape included as [Appendix C](#). The standards and practices utilized by 3DScape in producing the visual simulations are based upon extensive experience supporting many projects for the California Energy Commission (CEC) and the Bureau of Land Management (BLM). This methodology is consistent with the standards and practices required by visual resource impact assessment under both CEQA and the National Environmental Policy Act (NEPA).

Prior to preparing the visual simulations, 3DScape conducted a viewshed analysis, including the generation of a “seen-unseen” area map to determine those areas with possible views of the four 80- to 90-foot stadium lights. This “seen/unseen” area map, as well the Key Observation Points (KOPs) (discussed further below under “Analysis”), are presented in [Figure 8, Viewshed Analysis and KOP Locations Map](#). The basis for the viewshed study was calculated from a 360-degree view, emanating from a specific geographic location in order to predict which surrounding features might be visible from it; similar to rotating the light source of a lighthouse. The study area utilized for this viewshed analysis was limited to a 0.5-mile radius and integrates multiple lines-of-sight around a fixed reference location to predict and map its overall viewshed. The converse of this methodology is also true: the resulting study also reveals which surrounding areas might see the fixed reference point, in this instance, the four stadium lights.

For this analysis, the viewshed reference point was fixed atop a specific geographic point, centered between the four proposed stadium light towers (altitude set at 90-feet above ground elevation and continuous). The resulting “seen-area” map shows those areas coded in green, both near and distant, from which the proposed, new stadium lights might be visible from. And while the resulting viewshed analysis provides a useful instrument in locating/selecting key observation points (KOPs), it is also important to note that those areas coded in green as “might be visible” may still be screened from view by intervening landscape, which is not a viewshed processing parameter.

The source data provided to 3DScape for this viewshed study was in the form of AutoCAD.dwg and .PDF files provided by Verde Design and Musco Sports Lighting. The position and height of the stadium light towers were modeled from the Musco lighting design site plan and elevation drawings.



**VIEWSHED STUDY FINAL
SEEN-UNSEEN MAPPING**

N SALINAS HS STADIUM

VISIBILITY LEGEND:

- STADIUM LIGHTS
- LIMIT OF ANALYSIS
(0.5 MILE RADIUS)
- AREAS WHERE STADIUM
LIGHTS MIGHT BE VISIBLE
- KOP LOCATIONS

KOP LOCATIONS:

KOP-1: E ALVIN DR

KOP-2: BLOCK AVE

KOP-3: DORORO & REATA

KOP-4: N MAIN ST &
CHAPARRAL ST



Source: 3DScape 2023

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As the first step in the simulation generation process, high resolution digital photography was captured by 3DScape from the 3 key observation points (KOPs) verified by the use of GPS location support data. A standard 35mm digital, SLR camera with a 45mm focal length was utilized consistently throughout the process, resulting in what is referred to as a “normal” view. A normal view allows for viewing of the 3D model under similar circumstances to the proposed project physically viewed in the field. Next, the digital photography, along with the corresponding GPS support data was referenced in real world scale to 3D Computer Aided Design (CAD) platforms; (3D Studio & AutoCAD) respectively. To ensure a high degree of visual accuracy in the visual simulations, Computer Aided Design (CAD) allows for life-size 3D modeling within the computer. This translates to using real world scale and dimension to locate and portray facilities/structures and terrain features. Other data utilized to verify visual simulation precision includes aerial photography, existing reference points, and Google Earth topographical data. To verify proposed structure location, elevation, and orientation, Google Earth topographical and aerial photography data were initially employed as background reference files. Then 3D Studio massing models of the proposed structures were constructed, based upon AutoCAD data provided by the school district. Camera positions and orientations were also recorded in the same 3D coordinate space, according to the aforementioned GPS location data and aerial photography. Completing these stages of the process, the 3D Studio massing models of the proposed structures, and the camera locations, now exist together in real world scale with respect to distance, elevation, and orientation. To generate the correct view relative to the digital photography, a 3D 35mm digital camera with a 45mm focal length, matching the physical lens from the field, was set up at its appropriate position in 3D coordinate space; again, verified by the GPS location support data. Next, the digital photography was imported into the 3D database and referenced as an environment map, generating the digital camera view of the 3D model.

From there, the 3D massing models of the proposed structures were displayed, along with any significant existing structures, so that proper alignment, scale, angle, and distance could be verified. To complete the process, materials and texture mapping were applied to the 3D models. Then, a reality-based lighting solution was generated, based on lighting engineering data provided by the school district. To achieve this, physically based, photometric light sources were placed within the 3D model to represent each fixture. Light source characteristics were then matched, according to the engineering lighting data, including light fixture type, light power, temperature/color, and angle. And finally, the visual simulation was then generated with a physically based rendering engine, utilizing a multi-threaded image processing algorithm widely known as ray tracing.

Analysis

- a. A scenic vista is generally described as a clear, expansive view of significant regional features possessing visual and aesthetic qualities of value to the community. The Salinas General Plan identifies “view corridors” from Highway 101 (see Figure CD-2 on page CD-14 of the City’s general plan; available online at: <https://www.cityofsalinas.org/files/sharedassets/city/residents/documents/generalplan.pdf>); however, those corridors are largely identified looking west from the highway with the exception of eastward vistas into the Carr Lake area (approximately 1.5 miles south of the high school). The stadium site is approximately 0.90 miles east of Highway 101 though not visible from the highway.

Daytime Visual Simulations

To illustrate the future off-site day time conditions, day time visual simulations were prepared for the four off-site KOPs located north (KOP-1), east (KOP-2), south (KOP-3), and west (KOP-4) of the stadium in publicly accessible areas where the terrain and vegetation offer a clear view of the proposed stadium light poles in locations near the high school. These KOP locations are shown in the previously referenced Figure 10. The existing (pre-stadium improvements installation) and proposed (after stadium improvements installation) daytime conditions are presented for each of these KOPs on the following series of figures:

- Figure 9a, KOP-1 – E. Alvin Drive (Daytime Existing); and Figure 9b, KOP-1 – E. Alvin Drive (Daytime Proposed);
- Figure 10a, KOP-2 – Block Avenue (Daytime Existing); and Figure 10b, KOP-2 – Block Avenue (Daytime Proposed);
- Figure 11a, KOP-3 – Dororo Drive (Daytime Existing); and Figure 11b, KOP-3 – Dororo Drive (Daytime Proposed);
- Figure 12a, KOP-4 – Chaparral Street (Daytime Existing); and Figure 12b, KOP-4 – Chaparral Street (Daytime Proposed).

Because the high school is located at a similar elevation (approximately 85 feet above sea level) as the closest point of Highway 101 and is not highly visible from a distance, the proposed 80-foot and 90-foot-high field lights, both illuminated at night and not illuminated during the daytime, would likely be visible from some vantage points along Highway 101 and in the vicinity. However, given that the lights will only be illuminated temporarily and only during certain events (i.e., football games and other athletic events) that occur infrequently, the impact to scenic vistas would be temporary and would not rise to a level of significance to require mitigation. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. Additional evaluation of the proposed lighting is presented in “d” below.



Source: 3DScape 2023

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Source: 3DScape 2023

KOP-1 – E. Alvin Drive (Daytime Proposed)

North Salinas High School Stadium Improvements

E

M

C

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Source: 3DScape 2023

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Source: 3DScape 2023

KOP-2 – Block Avenue (Daytime Proposed)

North Salinas High School Stadium Improvements

E

M

C

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Source: 3DScape 2023

Figure 11a
KOP-3 – Dororo Drive (Daytime Existing)
North Salinas High School Stadium Improvements Initial Study

E

M

C

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Source: 3DScape 2023

KOP-3 – Dororo Drive (Daytime Proposed)

North Salinas High School Stadium Improvements

E

M

C

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Source: 3DScape 2023

Figure 12a
KOP-4 - Chaparral Street (Daytime Existing)

North Salinas High School Stadium Improvements Initial Study

E

M

C

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Source: 3DScape 2023

KOP-4 – Chaparral Street (Daytime Proposed)

Figure 12b

North Salinas High School Stadium Improvements

E

M

C

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- b. The project site is located approximately 2.35-miles north of State Route 68, which according to the California State Scenic Highway System Map, is an “eligible” State scenic route, and approximately eight miles east of State Route 1, which is also an eligible State scenic route (Caltrans 2019). The proposed project would not damage any scenic resources within a State-designated scenic highway with improvements to the existing stadium due to the site’s distance from eligible scenic segments of State Route 68 and State Route 1.
- c. The North Salinas High School campus is located in the City of Salinas, an urbanized, developed area with a variety of uses surrounding the high school campus including residences, an office park, and places of worship. The vicinity also features other schools and various commercial and visitor-serving uses. In accordance with California Government Code Section 53904(a), the proposed project is not subject to the City of Salinas Zoning Ordinance and the applicable lighting and design requirements for the high school’s zoning designation of “Public/Semipublic (PS).” Nonetheless, the proposed project is compliant with all applicable outdoor lighting requirements per the City’s zoning ordinance governing outdoor lighting (Section 37-50.480 – Outdoor Lighting). According to the City’s outdoor lighting requirements, outdoor lighting shall employ cutoff optics that allows no light emitted above a horizontal plane running through the bottom of the fixture. The proposed lighting design for the field lights is consistent with this lighting design standard. Additionally, the project design is consistent with the City’s requirement under City Code Section 37-50.480(a) which states that “Illumination at an R or NU (NE, NG-1, and NG-2) district property line shall not exceed one-half footcandle maximum.” The proposed project’s maximum foot-candle measurement at property boundaries do no exceed 0.5 foot-candles. Additional discussion and analysis of the proposed project’s consistency with this particular aspect of the City’s outdoor lighting standards under City Code Section 37-50.480(a) is discussed further below under checklist question “d.” The proposed improvements to the high school would not conflict with applicable zoning and other regulations governing scenic quality.
- d. As previously noted, the proposed project includes new, permanent sports field lighting poles at the existing stadium. The new permanent sports lighting poles at the existing stadium would be elevated up to 90 feet above the field and, as a result, these new poles, and associated lighting occurring at irregular intervals, would be visible from various vantage points (when viewed from a distance) during the day (poles only) and during some evenings (poles and lights). Compared to the portable sports lighting currently used at the football stadium, the proposed new stadium lighting would create substantially less glare and spill light onto the surrounding residential properties. This is because the existing 25-foot high, diesel generator powered portable light direct the light across the field, rather than down onto the field, unlike the proposed shielded sports lighting that creates less glare and can be focused down onto the field. Consistent with the current use of the permanent and portable sports lights that would be replaced, the proposed lights would be turned off by when not in use.

While the new stadium lighting poles would be at least partially visible during the day, they would not create a source of daytime glare. Although individual views from adjacent residences may be affected, sports lighting is currently used on the fields. Therefore, the use of the proposed lighting in place of the existing portable lighting would not substantially change nighttime views of the surrounding area. The lighting would be designed to reduce spill light and the visibility of the lights. The proposed light fixtures would be angled downward and would include light visors and light hoods to direct the light down onto the field and minimize the amount of spill light onto adjacent streets and residences.

Nighttime Visual Simulations

The project would install new permanent lighting fixtures at the North Salinas High School Stadium, which currently lacks permanent on-site field lighting poles. As shown in the various lighting plans, the proposed light poles and lighting are designed to focus lighting directly on the field and minimizes dispersion of light outward. Two of the lighting poles will be located behind the northern, home seating area and will extend 90 feet high and the two lighting poles near the visitor seating bleachers will be 80 feet high. Each pole will be on a pre-cast concrete base approximately 10 feet below ground. Each lighting pole will feature three separate luminaires with two (2) 90-foot-tall light poles located on the eastern edge of the stadium next to the new home bleachers (and identified as F1 and F2). The F1 and F2 light poles will feature additional field and safety lighting mounted at 70-feet and 25-feet on each pole. The other two (2) 80-foot-tall light poles (located on the western edge of the stadium next to the new visitor bleachers identified as F3 and F4) will feature additional field and safety lighting mounted at 70-feet and 15.5-feet on each pole. The four new lighting poles will result in a total of 44 luminaires with a total kilowatt (kW) load of 51.96. Light fixtures would be designed to direct light downward to minimize light trespass and sky glow (see Figures 5 and Figure 6 in Section A, Project Description, for further light pole design details). However, proposed lighting would be visible to the surrounding area, which would add illuminance to the existing minimally-lighted nighttime environment. From public streets in some surrounding neighborhoods, the proposed lighting would be visible. Like with the day time simulations discussed above under “a”, to illustrate the future off-site nighttime lighting conditions, nighttime visual simulations were prepared for four off-site KOPs. The existing (pre-stadium light installation) and proposed (after stadium lights installation) nighttime conditions are presented for each of these KOPs on the following series of figures (however, the existing nighttime simulations did not include the portable lights currently in use at the stadium). Therefore, this represents a worst-case, conservative analysis:

- [Figure 13a, KOP-1 – E. Alvin Drive \(Nighttime Existing\)](#); and [Figure 13b, KOP-1 – E. Alvin Drive \(Nighttime Proposed\)](#);
- [Figure 14a, KOP-2 – Block Avenue \(Nighttime Existing\)](#); and [Figure 14b, KOP-2 – Block Avenue \(Nighttime Proposed\)](#);
- [Figure 15a, KOP-3 – Dororo Drive \(Nighttime Existing\)](#); and [Figure 15b, KOP-3 – Dororo Drive \(Nighttime Proposed\)](#);
- [Figure 16a, KOP-4a – Chaparral Street \(Nighttime Existing\)](#); and [Figure 16b, KOP-4b – Chaparral Street \(Nighttime Proposed\)](#).

In addition, Musco Sports Lighting have prepared a set of photometric studies and illumination summaries that quantify the level of stadium lighting levels, as measured by horizontal and vertical foot-candles, at both the field, track, and edge of campus. Stadium light spill measurements are also shown. A summary of these light measurements is shown below in [Table 3, Stadium Field Lights Measurement Summary](#). A full set of Musco-generated light measurements is included as part of [Appendix B](#) of this initial study.

Table 3 Stadium Field Lights Light Measurement Summary

Sports Event	Horizontal Footcandle (fc) ¹ Measurements (Minimum/Maximum)	Vertical Footcandle (fc) ¹ Measurements (Minimum/Maximum)
Football	33 fc / 53 fc	N/A
Soccer	33 fc / 52 fc	N/A
Track	1 fc / 41 fc	N/A
Stadium Light Spill (approx. 200-foot radius around stadium)	0.01 fc / 0.00 fc	0.03 fc/0.00 fc

SOURCE: Musco Sports Lighting 2023

NOTE:

1. Foot-candle (fc). A foot-candle is a measurement of light intensity. One foot-candle is defined by the Illuminating Engineering Society of North America (IESNA) as enough light to saturate a one-foot square with one lumen of light (Waypoint Lighting 2023). Horizontal foot-candle. The amount of light being received on a horizontal surface such as a roadway or parking lot pavement. A vertical foot-candle is the amount of light received on a vertical surface such as a billboard or building façade.

[Figure 17, Foot-Candle Measurement Summary – Football Field](#), presents an overview of the stadium with proposed lighting locations (identified as Locations F1 through F4) and horizontal foot-candle measurements across the expanse of the football field as prepared by Musco Sports Lighting, the school district’s sports light contractor. [Figure 18, Foot-Candle Measurement Summary – Track](#), presents foot-candle measurements as measured within the perimeter of the track. [Figure 19, Foot-Candle Measurement Summary – Edge of Campus and Near Residential Receptors](#), presents light spill measurements as measured by maintained horizontal foot-candles along the campus boundary with the neighborhood to the immediate south and along the edge of the multi-family development to the immediate east of the stadium.

According to the school district's lighting consultant, Aaron Rose, Project Engineer with Musco Sports Lighting, on the property line closest to the stadium, foot-candle measurements of 0.93/0.95 were calculated. This measurement is 0.43/0.45 foot-candles greater than the City's foot-candle maximum of 0.5 foot-candles at the property line of residential districts; however, according to Mr. Rose, those foot-candle measurement differences cannot be visually detected by the average person and would only be detected with a light meter. According to Mr. Rose, a full moon is approximately 0.3 foot-candles and a sunny day is approximately 5,000 foot-candles. The property line on the neighbor side of the road doesn't exceed 0.3 foot-candles and is less than the City maximum of 0.5 foot-candles as required at the property line with any residential uses under City Code Section 37-50.480(a) (Aaron Rose, email with consultant, 18 April 2024). For these reasons and as demonstrated throughout this section of the initial study, the proposed project would create a less-than-significant impact on daytime or nighttime views in the project area.

Further, the lighting impacts from cumulative lighting in the vicinity were also evaluated. In addition to the existing portable stadium light poles at the high school, which the proposed project would replace, and the existing permanent light poles at the Salinas Sports Complex including Rabobank Stadium and the Salinas Rodeo Grounds (approximately 0.50 miles south of the project site), other facilities providing sporadic or regular nighttime lighting include large retail businesses in the vicinity along North Main Street. Although the businesses include nighttime lighting every night, the sports facilities are only lit when in use. Cumulative nighttime lighting can result in reducing the clarity of the night sky.

The proposed project, however, replaces the existing portable light poles at the stadium with permanent light fixtures. Although the proposed project would add to the cumulative nighttime lighting in the vicinity, which includes existing stadium/field lighting, the increase would not create substantial new sources of light and glare that would adversely affect nighttime views in the area. Therefore, the cumulative lighting impact would be less than significant.



Source: 3DScape 2023



Figure 13a
KOP-1 – E. Alvin Drive (Nighttime Existing)
North Salinas High School Stadium Improvements Initial Study

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Source: 3DScape 2023

KOP-1 – E. Alvin Drive (Nighttime Proposed)

North Salinas High School Stadium Improvements

E

M

C

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Source: 3DScape 2023

Figure 14a
KOP-2 – Block Avenue (Nighttime Existing)
North Salinas High School Stadium Improvements Initial Study

E

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Source: 3DScape 2023

KOP-2 – Block Avenue (Nighttime Proposed)

North Salinas High School Stadium Improvements

E

M

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Source: 3DScape 2023

Figure 15a
KOP-3 - Dororo Drive (Nighttime Existing)
North Salinas High School Stadium Improvements Initial Study

E

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Source: 3DScape 2023

Figure 15b

KOP-3 - Dororo Drive (Nighttime Proposed)

North Salinas High School Stadium Improvements

E

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Source: 3DScape 2023

KOP-4 – Chaparral Street (Nighttime Existing)

North Salinas High School Stadium Improvements Initial Study

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Source: 3DScape 2023

Figure 16b
KOP-4b – Chaparral Street (Nighttime Proposed)

North Salinas High School Stadium Improvements

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Equipment List For Areas Shown							
Pole				Luminaires			
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID OTHER GRID
1	F1	90'	-	90'	TLC-LED-1200	1	1 0
				90'	TLC-LED-1500	6	6 0
				70'	TLC-LED-550	1	0 1
				25'	TLC-BT-575	2	2 0
1	F2	90'	-	90'	TLC-LED-1200	1	1 0
				90'	TLC-LED-1500	5	5 0
				90'	TLC-LED-900	2	2 0
				70'	TLC-LED-550	1	0 1
1	F3	80'	-	80'	TLC-LED-1500	6	6 0
				80'	TLC-LED-900	2	2 0
				70'	TLC-LED-550	1	0 1
				15.5'	TLC-BT-575	2	2 0
1	F4	80'	-	80'	TLC-LED-1500	7	7 0
				70'	TLC-LED-550	1	0 1
				15.5'	TLC-BT-575	2	2 0
4	Totals					42	38 4

*Above Grade level relative to the field



Source: Musco Lighting 2024

Figure 17
Foot-Candle Measurement Summary – Football Field
North Salinas High School Stadium Improvements Initial Study

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Equipment List For Areas Shown									
Pole				Luminaires					
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS	
1	F1	90'	-	90'	TLC-LED-1200	1	1	0	
				90'	TLC-LED-1500	6	6	0	
				70'	TLC-LED-550	1	0	1	
				25'	TLC-BT-575	2	2	0	
1	F2	90'	-	90'	TLC-LED-1200	1	1	0	
				90'	TLC-LED-1500	5	5	0	
				90'	TLC-LED-900	2	2	0	
				70'	TLC-LED-550	1	0	1	
				25'	TLC-BT-575	2	2	0	
1	F3	80'	-	80'	TLC-LED-1500	6	6	0	
				80'	TLC-LED-900	2	2	0	
				70'	TLC-LED-550	1	0	1	
				15.5'	TLC-BT-575	2	2	0	
1	F4	80'	-	80'	TLC-LED-1500	7	7	0	
				70'	TLC-LED-550	1	0	1	
				15.5'	TLC-BT-575	2	2	0	
4				Totals		42	38	4	

*Above Grade level relative to the field



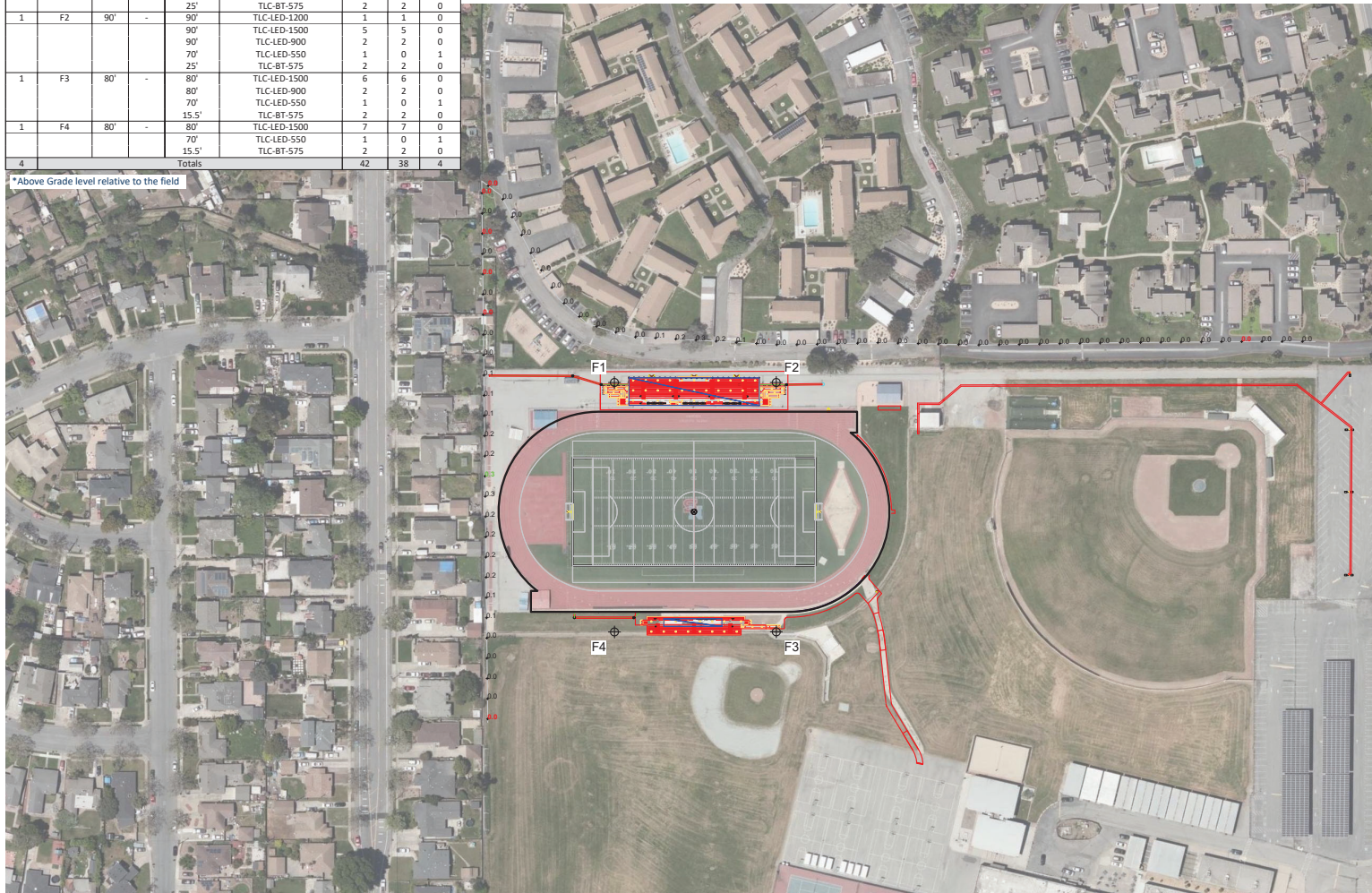
Source: Musco Lighting 2024

Figure 18
Foot-Candle Measurement Summary – Track
North Salinas High School Stadium Improvements Initial Study

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Equipment List For Areas Shown								
Pole				Luminaires				
QTY	LOCATION	SIZE	GRADE ELEVATION	ABOVE GRADE LEVEL	LUMINAIRE TYPE	QTY/POLE	THIS GRID	OTHER GRIDS
1	F1	90'	-	90'	TLC-LED-1200	1	1	0
				90'	TLC-LED-1500	6	6	0
				70'	TLC-LED-550	1	0	1
				25'	TLC-BT-575	2	2	0
1	F2	90'	-	90'	TLC-LED-1200	1	1	0
				90'	TLC-LED-1500	5	5	0
				90'	TLC-LED-900	2	2	0
				70'	TLC-LED-550	1	0	1
				25'	TLC-BT-575	2	2	0
1	F3	80'	-	80'	TLC-LED-1500	6	6	0
				80'	TLC-LED-900	2	2	0
				70'	TLC-LED-550	1	0	1
				15.5'	TLC-BT-575	2	2	0
1	F4	80'	-	80'	TLC-LED-1500	7	7	0
				70'	TLC-LED-550	1	0	1
				15.5'	TLC-BT-575	2	2	0
4	Totals					42	38	4

*Above Grade level relative to the field



0 255 feet

Source: Musco Lighting 2024

Figure 19

Foot-Candle Measurement Summary – Edge of Campus and Near Residential Receptors

North Salinas High School Stadium Improvements Initial Study



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2. AGRICULTURE AND FOREST RESOURCES

In determining whether impacts on agricultural resources are significant environmental effects and in assessing impacts on agriculture and farmland, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Comments:

- a, e. The project site is part of an existing high school. According to the California Department of Conservation (DOC) *California Important Farmland Finder* website, the project site is considered "Urban and Built-Up Land" (DOC 2023). Therefore, the proposed project would not result in the conversion or loss of farmland.

- b. According to the City of Salinas zoning ordinance, the project site is not located within land zoned agricultural. According to the Monterey County Williamson Act Map, the project site is not in a Williamson Act contract. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract.
- c, d. The project site does not contain forest or timber land. The Monterey County general plan states that there are currently no parcels of real property zoned for timberland production pursuant to the California Timberland Productivity Act within the County (Monterey County 2010, p. LU-2). Additionally, the project site is not categorized as forest land pursuant to Public Resources Code Section 12220(g). Therefore, the proposed project would not rezone or result in the loss of forest land or timberland.

3. 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:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment 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?	☐	☐	☐	☒

The project site is located in the North Central Coast Air Basin, which is under the jurisdiction of the Monterey Bay Air Resources District (“air district”), formerly known as the Monterey Bay Unified Air Pollution Control District (MBUAPCD). The air district has regulatory authority over stationary sources of air emissions, monitoring air quality within the air basin, providing guidelines for analysis of air quality impacts pursuant to CEQA, and preparing an air quality management plan to maintain or improve air quality in the air basin. The air district has developed thresholds of significance for criteria air pollutants. These are contained in the *CEQA Air Quality Guidelines* (“air district CEQA Guidelines”) (Monterey Bay Unified Air Pollution Control District 2008).

Comments:

- a. A consistency determination is a process by which the Lead Agency demonstrates that the population associated with a proposed project is accommodated by the Association of Monterey Bay Area Governments’ regional growth forecasts. The regional growth forecasts for population and dwelling units are embedded in the emission inventory projections used in the air quality plan. Projects consistent with the regional growth forecasts have been accommodated in the air quality plan, and are therefore consistent with the air quality plan. The proposed project is not population generating, and therefore it would not conflict with or obstruct implementation of the air quality management plan (MBUAPCD Air Quality Guidelines, page 5-10).

- b. Emissions from construction activities (e.g., excavation, grading, on-site vehicles) represent temporary impacts that are typically short in duration, depending on the size, phasing, and type of project. Construction activities which generate levels of PM₁₀ that exceed the established threshold of significance (82 pounds per day) would be considered to have significant impact on local air quality. The air district has established screening thresholds for construction-related activities with minimal earthmoving (8.1 acres per day). Construction projects below the screening level threshold are not considered to have a significant impact. Due to the fact that construction will only take place on a small portion of the school campus and will involve minimal grading or excavation (less than 8.1 acres per day), the project would not generate construction PM₁₀ emissions that would exceed the air district threshold of significance.

Per the air district's CEQA Guidelines, ozone precursor emissions from construction projects using typical equipment are accounted for in the emission inventories of the air quality management plan. Since the proposed project would use typical construction equipment, ozone precursor emissions from project construction are accounted for in the emission inventories and would not have a significant impact on the attainment and maintenance of the National or State ambient air quality standards for ozone. Therefore, construction activities would have a less-than-significant air quality impact from ozone generation.

Table 4, *Thresholds of Significance for Criteria Air Pollutants*, provides project-level thresholds of significance for criteria air pollutants during operation of a project.

Table 4 Thresholds of Significance for Criteria Air Pollutants

Pollutants Source	Threshold(s) of Significance ¹
ROG (Reactive Organic Gas)	137 lb/day (direct + indirect) ²
NO _x , as NO ₂	137 lb/day (direct + indirect) ²
PM ₁₀	82 lb/day (on-site) ³
CO	550 lb/day (direct)

SOURCE: Monterey Bay Unified Air Pollution Control District 2008

NOTE:

1. Projects that emit other criteria pollutant emissions would have a significant impact if emissions would cause or substantially contribute to the violation of state or national ambient air quality standards. Criteria pollutant emissions could also have a significant impact if they would alter air movement, moisture, temperature, climate, or create objectionable odors in substantial concentrations. When estimating project emissions, local or project-specific conditions should be considered.
2. Because of the complexities of predicting ground level ozone concentrations in relation to the state and national ambient air quality standards, the air district has developed mass emissions thresholds for Volatile Organic Compounds (VOCs) and NO_x that can be used to make significance determinations. The air district ties these thresholds to the local attainment status of ozone. Exceedance of VOC and/or NO_x thresholds indicates that a project would be inconsistent with ozone standards, resulting in a significant contribution to ground level ozone impacts.
3. The air district's 82 pounds per day operational phase threshold of significance applies only to onsite emissions and project-related exceedances along unpaved roads. These impacts are generally less than significant. On large development projects, almost all travel is on paved roads (0% unpaved), and entrained road dust from vehicular travel can exceed the significance threshold. Please contact the air district to discuss estimating emissions from vehicular travel on paved roads. Air district-approved dispersion modeling can be used to refute (or validate) a determination of significance if modeling shows that emissions would not cause or substantially contribute to an exceedance of California and national ambient air quality standards.

Projects which could generate 82 pounds per day or more of PM₁₀ at the project site (e.g., quarries, truck stops) would result in substantial air emissions and have a significant impact on local air quality. This threshold of significance applies only to on-site emissions and project-related exceedances along unpaved roads. Due to the small scale of the project and the fact that the all travel will take place on paved roads, the project would not exceed the significance threshold for PM₁₀.

The air district's CEQA Guidelines provide reference for indirect sources with potentially significant impacts on ozone. CEQA Guidelines Table 5-4, Indirect Sources with Potentially Significant Impacts on Ozone, identifies project types and sizes below which ozone impacts can be screened out as less than significant. The table references Volatile Organic Compounds (VOCs) and NO_x as the components of ozone. Reactive Organic Gases (ROGs) are a class of VOCs, and for analysis purposes, the two are assumed to be equivalent. High schools are a specific land use type described in this table. Typical school project emissions are significantly below the thresholds of significance. Since the project would only take place on a small portion of the entire school site, ROG and NO_x emission impacts would be less-than-significant.

The magnitude of CO emissions can be qualitatively evaluated by comparing the emissions volumes from other project types/sizes relative to the proposed project. The air quality analyses in a recent CEQA document prepared for the Carmel High School Stadium Lights Project, which included four new stadium lights, parking lot improvements, a new storage building, and shifting of existing local off-site and on-site athletic and academic events to evenings, is a representative project. That project was found to generate 0.8 pounds of CO per day, primarily associated with new mobile sources (EMC Planning Group 2021). This is well below the air district thresholds of 550 pounds per day.

With the exception of junior and varsity football, all North Salinas High School home game sporting events presently take place on campus. Shifting any or all of these events to evening is not expected to result in increased CO emissions. Friday evening football games currently take place off-site at Rabobank Stadium which is part of the Salinas Sports Complex, located approximately one-half mile south of the campus. Since vehicle trips and vehicle miles traveled associated with football games are already being generated by travel to and from Rabobank Stadium, the proposed project is not expected to generate an increase in CO emissions relative to existing conditions, as shifting games to the campus is not expected to increase vehicle trip number or vehicle miles traveled. Therefore, the project contribution to CO impacts would be less than cumulatively considerable.

- c. Sensitive receptors refer to those segments of the population most susceptible to poor air quality. Children, the elderly, and the chronically or acutely ill are the most sensitive population groups that are more susceptible to adverse effects of air pollution than others. These sensitive receptors are commonly associated with specific land uses such as residential areas, elementary schools, retirement homes, and hospitals.

Toxic air contaminants (TACs) are pollutants that may be expected to result in an increase in mortality or serious illness or may pose a present or potential hazard to human health. Health effects include cancer, birth defects, neurological damage, damage to the body's natural defense system, and diseases that lead to death. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuels combustion, and commercial operations (e.g., dry cleaners). Construction equipment and associated heavy-duty truck traffic generates diesel exhaust and fugitive dust that poses health risks for sensitive receptors. Diesel particulate matter, which is a known TAC, is a component of diesel exhaust. Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs.

The location and intensity of a development project are major factors in determining whether the project will result in localized air quality impacts. From a health risk perspective there are basically two types of land use projects that have the potential to cause long-term public health risk impacts: (1) land use projects that will place new toxic sources in the vicinity of existing receptors, and (2) land use projects that will place new receptors in the vicinity of existing toxics sources. However, the proposed project does not constitute a new land use project but rather minor modifications to the operations of an existing land use, where the new operations are not a source of operational TACs.

Toxic air contaminants in the form of diesel exhaust from diesel equipment used during construction would be the primary consideration for the proposed project. TACs such as diesel particulate matter are commonly produced from the short-term use of diesel-powered construction equipment. Construction emissions are considered to be “short-term” in the sense that they would be limited to the limited duration when such equipment is used. In the case of the proposed project, installing the proposed improvements would not require intensive use of diesel-powered equipment.

The air district's CEQA Guidelines do not provide screening thresholds for TACs generated by construction equipment. Therefore, this analysis is qualitative. Although there are sensitive residential receptors adjacent to the site, construction activities for the project will not be intensive (e.g., no substantial earthmoving, grading, excavations, building construction, etc.), would not require substantial use of diesel-powered equipment, and would occur over a short period of time. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations.

- d. The most common sources of odors identified in complaints received by local air districts are sewage treatment plants, landfills, recycling facilities, waste transfer stations, petroleum refineries, biomass operations, autobody shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations. The proposed would not produce these types or other significant objectionable smells and involves minimal construction that would result in emissions, such as those leading to odors, that would adversely affect a substantial number of people (MBUAPCD Air Quality Guidelines, page 3-5). Therefore, there would be no impacts associated with odor.

4. BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US 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, or regulations, or by the California Department of Fish and Wildlife or US 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?	☐	☐	☐	☒
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Comments:

The project site is located in an urbanized area of Salinas and is developed with the existing high school and associated sports fields. There are no sensitive habitats, wetlands, aquatic features, or trees at the project site.

Wildlife species in urban areas are typically limited to those acclimated to frequent disturbance and noise, including common species such as house finch (*Haemorrhous mexicanus*), rock dove (*Columba livia*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), mice (*Mus musculus*, *Reithrodontomys megalotis*, and *Peromyscus maniculatus*), and squirrel (*Sciurus sp.*).

- a. **Special-Status Species.** Special-status species are those listed as Endangered, Threatened, or Rare, or as Candidates for listing by the United States Fish and Wildlife Service (USFWS) or California Department of Fish and Wildlife (CDFW) under the state and/or federal Endangered Species Acts. The special-status designation also includes CDFW Species of Special Concern and Fully Protected species, California Native Plant Society (CNPS) Rare Plant Rank 1B and 2B species, and other locally rare species that meet the criteria for listing as described in Section 15380 of CEQA Guidelines. Special-status species are generally rare, restricted in distribution, declining throughout their range, or have a critical, vulnerable stage in their life cycle that warrants monitoring.

Due to the lack of sensitive habitats and the human disturbance of the project site, special-status plant and animal species are not expected to occur on the project site.

Lighting. As described in Section 1, Aesthetics, temporary lighting powered by portable diesel generators is currently being used for some athletic practices and events. Once constructed, the permanent stadium light poles would be a maximum of 90 feet tall. Given the small surface area of their vertical and horizontal structure, poles would not have a significant impact on bird flight, including during migration. Consistent with current use of temporary lighting, the permanent stadium lights would be on for only short periods consisting of ½ an hour to four hours on selected nights for up to four months, with most of the light use occurring during the school year between September and May [[Table 2, Proposed Schedule of Stadium Uses \(After Installation of Stadium Improvements\)](#)]. The proposed project incorporated light designs that minimize light pollution into the project design, and outdoor lighting will be provided in a manner that provides for nighttime safety, utility, security, and enjoyment while limiting light trespass into areas surrounding the campus.

There is evidence that powerful ground-based light sources in urban areas, such as the National September 11 Memorial & Museum in New York, induces significant behavior alterations in birds. However, when lights were extinguished, these alterations disappeared (Van Doren et. al. 2017). Since lighting would occur during short durations and little light trespass would occur, stadium lights are unlikely to result in birds becoming trapped within the light zone and causing a substantial and prolonged shift in migratory patterns. In addition, lighting events would occur between September and May, outside of the majority of the nesting bird season (generally January 15 to September 15). While lighting of the proposed project may cause the existing, active high school campus to be less attractive to nesting birds in the immediate vicinity, similar nesting habitat is located in the surrounding neighborhoods and higher quality habitat is available within regional vicinity, particularly along the Gabilan Creek corridor and agricultural or undeveloped areas surrounding the city. Potential impacts to nesting migratory birds and raptors as a result of increased light and glare are therefore considered less than significant.

- b. **Riparian Habitat or Sensitive Natural Communities.** There are no sensitive natural communities at the project site. Therefore, impacts to riparian habitat or sensitive natural communities are not anticipated.
- c. **Wetlands and Waters of the U.S.** There are no wetlands or waters of the U.S. at the project site. Therefore, impacts to wetlands or waters of the U.S. are not anticipated.
- d. **Wildlife Movement.** Wildlife movement corridors provide connectivity between habitat areas, enhancing species richness and diversity, and usually also provide cover, water, food, and breeding sites. The project site does not facilitate major wildlife movement due to the lack of habitat and existing level of disturbance.
- e. **Local Biological Resource Policies/Ordinances.** Measures to protect biological resources within City of Salinas are identified in the Conservation/Open Space Element of the City of Salinas General Plan. Goal COS-5 was included to, “Protect and enhance the remaining identified and significant ecological and biologist resources within and surrounding the community.” (Page COS-10, City of Salinas 2002). City of Salinas Code of Ordinance Chapter 35, Trees and Shrubs, includes regulations regarding the removal or disturbance to protected trees. No protected trees or sensitive biological resources were identified at the project site and impacts are not anticipated. The proposed project therefore does not conflict with any local biological resource policies or ordinances.
- f. **Conservation Plans.** There are no critical habitat boundaries, habitat conservation plans, natural community conservation plans, or other approved local, regional, or state habitat conservation plans applicable to the project site.

5. CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☒	☐	☐

Comments:

a-b. Background research on the project site included a records search at the Northwest Information Center of the California Historical Resources Information System, California State University, Sonoma for an examination of archaeological site records, as well as California Historical Landmarks, and the National Register of Historic Places. According to a letter written by the Northwest Information Center on February 15, 2023, there were no resources listed as being within the project area or within a ¼ mile radius. Five reports were listed as being within the ¼ mile radius, but not in the project area. In addition, on February 28, 2023, a pedestrian survey was undertaken by EMC Planning Group Archaeologist, Kaitlin Rupert, RPA. No historical resources or archaeological resources were observed.

Even though no cultural resources materials were located during the pedestrian survey of the existing stadium, given the project's proximity to other known cultural resource sites in the vicinity, there is always the potential for accidental discovery of unknown buried cultural resources during grading, trenching or other construction activities. Damage to significant cultural resources would be considered a significant adverse environmental impact. The following mitigation measures, included with development plans associated with the project site, would reduce this impact to a less-than-significant level.

Mitigation Measures

CR-1 Prior to initiation of any ground disturbing activities, the school district shall continue to consult with tribal representative(s) of the Esselen Tribe of Monterey County to determine the timing and frequency of a tribal monitor during construction activities associated with the proposed project. In addition, once the timing and frequency of tribal monitoring has been agreed to between the tribe and school district, the retained tribal monitor shall conduct a Tribal Cultural Resources Sensitivity Training with all project personnel prior to any ground disturbance.

- CR-2 In the event that archaeological resources are encountered during ground disturbing activities, the contractor shall temporarily halt or divert excavations within a 50-meter (165 feet) perimeter of the find until it can be evaluated. All potentially significant archaeological deposits shall be evaluated to demonstrate whether the resource is eligible for inclusion on the California Register of Historic Resources, even if discovered during construction. If archaeological deposits are encountered, they will be evaluated and mitigated simultaneously in the timeliest manner practicable, allowing for recovery of materials and data by standard archaeological procedures. For prehistoric archaeological sites, this data recovery involves the hand-excavated recovery and non-destructive analysis of a small sample of the deposit. Historic resources shall also be sampled through hand excavation, though architectural features may require careful mechanical exposure and hand excavation.

Any previously undiscovered resources found during construction activities shall be recorded on appropriate California Department of Parks and Recreation (DPR) forms and evaluated for significance by a qualified Archaeologist. Significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites.

- c. With no evidence of prehistoric or historic sites within the immediate project area or in a quarter mile buffer, the likelihood of the project disturbing human remains is low. However, there remains the possibility that ground disturbing activities associated with the proposed project could damage or destroy previously undiscovered Native American human remains. Disturbance of Native American human remains would be a significant impact. The following mitigation would reduce this potential impact to a less-than-significant level.

Mitigation Measure

- CR-3 In the event that human remains (or remains that may be human) are discovered at the project site, Public Resource Code Section 5097.98 must be followed. All grading or earthmoving activities shall immediately stop within 50 meters (165 feet) of the find. The Monterey County Coroner will be notified immediately, and the coroner shall be permitted to examine the remains as required by California Health and Safety Code Section 7050.5(b).

Section 7050.5 requires that excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If human remains are determined as those of Native American origin, the project proponent shall comply with the state relating to the disposition of Native American burials that fall within the jurisdiction of the NAHC (Public Resource Code [PRC] § 5097). The coroner shall contact the Native American Heritage Commission (NAHC) to determine the most likely descendant(s) (MLD). The MLD shall complete his or her inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site. The MLD will determine the most appropriate means of treating the human remains and associated grave artifacts, and shall oversee the

disposition of the remains. In the event the NAHC is unable to identify an MLD or the MLD fails to make a recommendation within 48 hours after being granted access to the site, the landowner or his/her authorized representative shall reburial the Native American human remains and associated grave goods with appropriate dignity within the project area in a location not subject to further subsurface disturbance if: a) the Native American Heritage Commission is unable to identify the MLD or the MLD failed to make a recommendation within 48 hours after being allowed access to the site; b) the descendent identified fails to make a recommendation; or c) the landowner or his authorized representative rejects the recommendation of the descendent, and the mediation by the Native American Heritage Commission fails to provide measures acceptable to the landowner.

6. ENERGY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
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?	☐	☐	☐	☒

The following analysis identifies the major forms of the anticipated project energy demand. This analysis is qualitative, commensurate with the qualitative nature of the threshold of significance.

Comments:

- a. The primary sources of energy demand will be from increased fuel use and electricity consumption during construction and operations of the proposed stadium improvements.

During the short-term construction process, diesel and gasoline use in construction equipment, material transport vehicles, portable power generation systems, and worker vehicles would be the primary sources of fuel use. However, fuel demand would be negligible given the minimal construction required.

Transportation fuel demand commonly increases when a proposed project generates new vehicle trips that result in new vehicle miles traveled (VMT). The City of Salinas's VMT policy provides recommendations regarding VMT evaluation methodology, significance thresholds, and screening. The VMT screening thresholds are intended to identify when a project would be expected to cause a less-than-significant impact. This includes small projects that generate or attract fewer than 110 trips per day and development that consists of local-serving essential services, such as a public K-12 school. Since the anticipated increase in daily trip rate (31-62 trips per day) (Hexagon 2023) is below the established threshold and the proposed project is high school related, the project impact on VMT is less-than-significant. This suggests that transportation fuel demand would be lower than would be expected for a project whose vehicle miles traveled impact is significant.

The new stadium lighting will be the primary sources of new electricity demand. New demand from these sources would be nominal given the limited application and frequency/duration of use. Additionally, the new lighting must conform to the California Energy Code, Building Energy Efficiency Standards (Title 24, Part 6), which

are uniformly applied to reduce energy consumption and provide energy-efficiency standards for residential and non-residential development (California Energy Commission 2022).

The project energy demand would be miniscule relative to common land use and development projects typically evaluated under CEQA (e.g., residential, commercial, and industrial projects). Energy impacts for such projects are often found to be less than significant, as there is no quantified threshold of significance above which energy impacts are determined to be significant.

Given the considerations summarized above, the proposed project would have a less-than-significant impact from wasteful, inefficient, or unnecessary energy resource demand during construction and operations.

- b. The school district has not adopted a plan for renewable energy, nor is it subject to complying with renewable energy plans of other local special districts or government agencies. State renewable energy plans do not specifically require action at the local special district or government agency level.

A multitude of state regulations and legislative acts are aimed at improving energy efficiency and enhancing energy conservation. While most of the energy-related legislation is enforced at the State level, the California Building Standards Code is enforceable at the local level by the school district, specifically the Board of Education, through the project approval process and required review by the Division of the State Architect which issues a "Written Approval of Plans" letter after it reviews the project for code compliance. That enforcement is the primary mechanism through which State mandated energy efficiency/conservation measures that are within the control of the school district must be implemented. Therefore, the project will not conflict with renewable energy efficiency/conservation plans.

7. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
(1) 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?	☐	☐	☐	☒
(2) Strong seismic ground shaking?	☐	☐	☐	☒
(3) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
(4) 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, creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Comments:

- a. **Fault Rupture.** The project site is not located within an Alquist-Priolo Earthquake Fault Zoning Map; the nearest fault located within an Alquist-Priolo Earthquake Fault Zone (the San Andreas Fault) is located over 11 miles northeast of the site. Therefore, the proposed project would not directly or indirectly cause potential substantial adverse

effects, including the risk of loss, injury, or death involving the rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map (Department of Conservation 2023).

Ground Shaking. According to the General Plan's Figure S-1, Seismic Hazard Zones, the project site is within low seismic hazard zone. The project would not involve activities that would exacerbate seismicity risks and therefore, not result directly or indirectly in potentially substantial adverse effects, including the risk of loss, injury, or death involving fault rupture or seismic ground shaking.

Liquefaction. According to the County Parcel Report Web App, liquefaction hazards are low at the project site (Monterey County 2023). It is unlikely that the type of construction required for the proposed project would result in seismic-related ground failure, including liquefaction.

Landslides. According to the County Parcel Report Web App, landslide hazards are low at the project site (Monterey County 2023). As a result of relatively flat land at the project site, the proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides.

- b. The project site contains Chualar loam (CbA) soil (Monterey County 2023), which have minimal to slight erosion hazard risks (USDA 1978). Project construction would require minimal earthwork activities associated with installation of the project improvements, but would not result in soil erosion or the loss of topsoil.
- c. Project construction would require minimal earthwork activities associated with installation of project improvements. Based on this and the soil properties at the project site, the proposed project would not 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. Project construction would require minimal earthwork activities associated with installation of the project improvements. Based on this and the soil properties at the project site, the proposed project would not be located on expansive soil, creating substantial direct or indirect risks to life or property.
- e. The proposed project would not involve the use of septic systems and, therefore, no further discussion is required.
- f. There are no unique geologic features located on or adjacent to the project site.

According to the Salinas General Plan EIR, important paleontological resources have the potential to occur within the Salinas planning area, especially in the undeveloped future growth areas (City of Salinas 2002). However, the proposed project would involve minimal, if any, earthmoving activities that would have the potential to impact paleontological resources. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

8. GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

The proposed project would generate GHG emissions during its operation and construction. Operational GHG emissions would be generated primarily from electricity use and by vehicle trips accessing the project site. GHG emissions from the proposed project that are common to land use development projects, including area sources, water supply, wastewater, and solid waste, are expected to be nominal and would not affect conclusions of the analysis. Therefore, these sources are not discussed further.

Comments:

- a. The school district has not adopted thresholds of significance for GHG emissions, nor has the air district or the City of Salinas, whose guidance the school district might otherwise rely upon. Lead agencies may also reference thresholds of significance supported by substantial evidence that have been adopted by other agencies. GHG emissions impact guidance developed by the Bay Area Air Quality Management District in its *CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans* (Bay Area Air Quality Management District 2022) is often referenced by lead agencies in Monterey County for evaluating the significance of GHG impacts for land use projects. However, that guidance applies specifically to residential, office, and retail development, not school-related projects, so is not informative here. Due to the absence of applicable threshold guidance, the analysis here is qualitative and commensurate with the minimally intensive GHG characteristics of the proposed project. The analysis addresses the two main sources of GHG emissions from the project – electricity consumption and mobile source emissions from vehicle travel.

During its long-term operations, the proposed project would result in a minor increase in electricity consumption from the new stadium field lighting and egress lighting along the existing pedestrian pathway. Electricity provided to customers in Salinas is sourced by Central Coast Community Energy, but delivered through infrastructure owned by PG&E. Approximately 31 percent of electricity provided for this type of account is generated from renewable sources. Customers can pay more than default rates for 100 percent renewable energy. Consequently, the minor increase in demand causes even lower GHG emissions than would otherwise be the case for electricity supplied from purely fossil-fuel based electricity generation sources.

Mobile source GHG emissions during the operations of a land use or development project are generally directly related to the vehicle travel it generates. As VMT increases, mobile source GHG emissions increase. Mobile source GHG emissions generally comprise the majority of a land use project's GHG emissions inventory. Projects whose VMT impact is found to be less than significant typically have a less-than-significant overall GHG impact, particularly in cases such as the proposed project where other GHG emissions sources (e.g., electricity use) are nominal. While the school district has not adopted a VMT policy, the City of Salinas' VMT policy provides is instructive, as it provides recommendations regarding VMT screening thresholds, below which a project would have a less-than-significant VMT impact. A VMT assessment completed for the project concluded that it would have a less-than-significant GHG impact, as discussed in Section D.17, Transportation. Since mobile source GHG emissions would be less than significant and other sources of GHG emissions would be negligible, operational GHG impacts would be less-than-significant.

Construction activities would be minimal in terms of intensity and duration. Construction activity would primarily consist of boring, pouring concrete footings, and minor trenching for erecting light standards and construction worker/vehicle trips. GHG emissions from construction activities are "short-term" and fuel and electricity demand from the basic construction equipment needed to install the improvements would be minimal. Many air districts, including the Bay Area Air Quality Management District, do not consider construction phase GHG emissions to be an important source of cumulative GHG emissions impact, so have not adopted construction phase thresholds of significance. Given that the project operational and construction source GHG emissions would be limited, the project would have a less-than-significant impact from generation of GHG emissions.

- b. Neither the school district, nor the air district have adopted plans or regulations for reducing GHGs. Therefore, the proposed project would not conflict with a locally applicable plan or regulation for reducing GHG emissions. The City of Salinas is in the process of preparing a climate action plan for reducing GHG emissions, that if adopted as a qualified GHG reduction plan pursuant to CEQA Guidelines section 15183.5, could serve as guidance for the school district. However, the City's is not expected to adopt its plan prior to the school district making a decision to approve the proposed project. And as noted in item "a" above, the GHG reduction plan guidance adopted by the Bay Area Air Quality Management District is not applicable to a project of the type proposed.

The proposed improvements must be consistent with the California Energy Code, Building Energy Efficiency Standards (Title 24, Part 6), which is designed to reduce energy use. Given these factors, the project would have no impact from conflict with applicable GHG reduction plans or regulations.

9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☐	☒
e. For a project located within an airport land-use plan or, where such a plan has not been adopted, within two miles of a public airport or a 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?	☐	☐	☐	☒

Comments:

- a. The improvements proposed by the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.
- b. The project site consists of an existing athletic stadium, which has been utilized as an athletic field since the school's founding in 1959 with a stadium facility having been built as part of the renovated Marv Beguhl Sports Complex in 2006. The existing stadium facility features a synthetic turf field, rubber track, home and visitor bleachers and press box. The proposed project would involve minimal, if any, earthmoving activities and,

therefore, would not 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. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste.
- d. The following lists were reviewed:
 - Hazardous Materials Waste and Substances Sites from the Department of Toxic Substances Control EnviroStor Database (Department of Toxic Substances Control 2023);
 - Leaking Underground Storage Tank Sites from the State Water Board's GeoTracker Database (State Water Resources Board 2023);
 - Solid Waste Disposal Sites Identified by Water Board with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit (California Environmental Protection Agency 2023a);
 - "Active" Cease and Desist Order and Cleanup and Abatement Orders from Water Board (California Environmental Protection Agency 2023b); and
 - List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the Department of Toxic Substances Control (California Environmental Protection Agency 2023c).

The project site is not located on any of these lists. Therefore, the proposed project is not 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 not create a significant hazard to the public or the environment.

- e. The project site is not located within two miles of a public airport or public use airport; the nearest is the Salinas Municipal Airport located over three miles southeast of the site. Therefore, the project would not expose persons to a safety hazard related to airports.
- f. The nature of the proposed project as a high school stadium improvement project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
- g. The project site is not located within a fire hazard zone and, therefore, the construction of improvements at the high school stadium would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

10. HYDROLOGY AND WATER QUALITY

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water 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:				
(1) Result in substantial erosion or siltation on- or off-site;	☐	☐	☐	☒
(2) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☐	☒
(3) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☐	☒
(4) Impede or redirect flood flows?	☐	☐	☐	☒
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

Comments:

- a. The proposed project would not involve construction or operational activities that would degrade or result in a violation of water quality standards.
- b. The proposed project would not involve construction or operational activities that would impact groundwater supplies or interfere with groundwater recharge.

- c. The project site does not contain any streams or rivers. The closest watercourse is Gabilan Creek, which is located approximately one mile southeast of the site. The proposed project involves various improvements at the high school that would not alter the existing drainage pattern of the site or area.
- d. The proposed project is not located within a tsunami or seiche zone; therefore, no impacts from releasing pollutants during a tsunami or seiche would occur.

The project site is located within a 0.2 percent Annual Chance Flood Hazard Zone; however, the type of improvements associated with the proposed project would not risk release of pollutants due to project inundation.

- e. The proposed project involves minimal construction activities that would not require the use of water and, therefore, would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

11. LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause any 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?	☐	☐	☐	☒

Comments:

- a. The proposed project would not physically divide an established community.
- b. The proposed project involves various improvements at the high school such as the installation of lighting and, therefore, would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Environmental lighting effects are evaluated in the following sections of this initial study: aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, transportation, tribal cultural resources, and utilities and service systems.

12. MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Result in 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 in a local general plan, specific plan, or other land-use plan?	☐	☐	☐	☒

Comments:

- a, b. According to the Salinas General Plan EIR, the only significant mineral resource area is just outside of the City's future growth area boundary and no City land use designation is applied to the site (City of Salinas 2002, p.5.10-2). Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state nor would the project result in the loss of availability of a locally important mineral resource recovery site delineated in a local general plan, specific plan, or other land-use plan.

13. NOISE

Would the project result in:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in 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 two miles of a public airport or public-use airport, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Comments:

The information in this section is primarily sourced from the *Environmental Noise Assessment – North Salinas High School Stadium Bleachers and Lighting Improvements* (“noise assessment”) (July 7, 2023) prepared by WJV Acoustics for the proposed project. The full noise assessment can be found in [Appendix D](#).

a. **Temporary Increase in Ambient Noise Levels**

Construction – Construction noise is typically not considered to be a significant impact if construction is limited to the daytime hours and construction equipment is adequately maintained and muffled. Therefore, all construction associated with the project must be confined to daytime hours, pursuant to the City’s General Plan Noise Element, which prohibits construction activity in the evening/nighttime hours as well as Sundays and holidays. Neither the General Plan nor the Municipal Code provide specific prohibited hours of construction activities; however, it is typical to limit construction activities to the hours of (at a minimum) 7:00 A.M. to 7:00 P.M. Project construction would be limited to this time frame and, therefore, would not result in significant noise impacts.

Permanent Increase in Ambient Noise Levels

Traffic Noise – The proposed stadium lighting is expected to result in an increase in attendance at football games and other sporting events, which would increase the vehicular trips. During the anticipated highest attended football games, the estimated

attendance is 2,250, which could result in a total of 1,389 daily trips. Based upon the assumption that an event would occur once per week or less during the football season, the average total daily trips would be 278. Assuming a vehicle speed of 35 miles per hours and a generalized setback distance of 75 feet from the roadway, noise levels associated with the daily trips on a single roadway would result in traffic noise exposure of approximately 41 dB L_{dn} . Such noise exposure levels would not exceed applicable City of Salinas noise level standards and would be considerably lower than existing ambient noise levels in the project vicinity. This noise exposure is not expected to result in any increase in overall traffic noise exposure levels throughout the greater project vicinity.

Stadium Events – Noise due to football games and other events held within the stadium would be extremely variable based upon such factors as the size of the crowd, volume of the public address system, and time of the day. As such quantifying and describing such noise levels can be problematic. Noise levels associated with football games would generally be limited to a few evening hours during each event, and the highest noise levels would typically be limited to up to five (5) home football games per year. As such, associated noise would occur very infrequently.

The proposed project would result in the addition of approximately five home football games during the fall sports season and approximately ten to twelve additional soccer practices during the winter sports season. The proposed project is expected to increase attendance at the stadium from 1,000 spectators to 1,500 spectators for most football games and from 2,000 spectators to 2,250 spectators for rivalry, playoff, or homecoming games. According to the noise assessment, the closest existing residential land uses to the stadium are located at a distance of approximately 300 feet and the estimated noise level associated with football games at the high school could be up to 63 L_{eq} (or 56 dB L_{dn}) at the nearby residential land uses. The calculated 56 dB L_{dn} exposure level was added to the existing measured ambient noise levels resulting in a noise level of 58-59 dB L_{dn} . The City's exterior noise level standard for residential land uses is 60 dB L_{dn} . Therefore, the noise levels from the stadium at nearby residential land uses would not exceed the City's exterior noise level standard for residential land uses.

Parking Lots – It is assumed that stadium event parking would occur at existing school parking lot areas. Noise due to traffic in parking lots is typically limited by low speeds and is not usually considered to be significant. The parking lot-related noise levels at the closest residential land uses would not be expected to exceed any of the applicable noise levels standards. Additionally, parking lot noise levels would not be expected to exceed existing ambient noise levels at the closest residential land uses.

- b. The dominant sources of man-made vibration are sonic booms, blasting, pile driving, pavement breaking, demolition, diesel locomotives, and rail-car coupling. None of these activities are anticipated to occur with construction or operation of the proposed project. Therefore, implementation of the proposed project would not generate excessive ground-borne vibration or ground borne noise levels.

- c. The project site is located more than three miles northwest of the Salinas Municipal Airport and is not located within the vicinity of a private airstrip (Google Earth Pro 2023). Therefore, the project would not expose people residing or working in the project area to excessive noise levels.

14. POPULATION AND HOUSING

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☐	☒
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Comments:

- a, b. The proposed project would not result in population growth, nor would it displace people or existing housing in the area.

15. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of or 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 following public services:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Fire protection?	☐	☐	☐	☒
b. Police protection?	☐	☐	☐	☒
c. Schools?	☐	☐	☐	☒
d. Parks?	☐	☐	☐	☒
e. Other public facilities?	☐	☐	☐	☒

Comments:

- a, b. The proposed project is the installation of various improvements at an existing high school stadium (e.g., lighting, public address system, seating, etc.). The proposed project would increase the number of spectators at home football games (4-6 times a year) and potentially increase the need for police and fire services at the high school during those temporary events. However, such a marginal increase in police and fire services would not necessitate additional fire and police protection that would require the construction of new or physically altered fire and police facilities, which would cause significant environmental impacts.
- c-e. The proposed project would not result in the need for additional school or park facilities, or other public facilities.

16. RECREATION

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
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?	☐	☐	☐	☒

Comments:

- a. The proposed improvements would not increase the use of existing neighborhood and regional parks or other recreational facilities. In fact, the ability of the school district to conduct further games and practices at the high school stadium will result in less demand on other existing facilities maintained by the City of Salinas (at off-campus parks and fields where high school teams may be required to hold practices and games) and Rabobank Stadium at the Salinas Sports Complex (operated by the California Rodeo Association).
- b. The proposed project involves the construction and expansion of the high school's existing recreational facilities. The potential impacts and any mitigation measures required to reduce these impacts are discussed throughout this initial study.

17. TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b. 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?	☐	☐	☐	☒

Comments:

Hexagon Transportation Consultants prepared a memorandum for the proposed project, *VMT Assessment for the Proposed North Salinas High School Stadium Improvements in Salinas, California* (June 2023) (“VMT assessment”). This transportation section is written primarily from this source. The full VMT assessment can be found in [Appendix E](#) of this initial study.

a. The proposed project does not involve new, or alteration of the existing, circulation system facilities at the site or its surroundings. The proposed improvements would, however, improve pedestrian accessibility on the project site through various improvements, such as egress lighting along pedestrian pathways and lighting in the existing parking area for pedestrians and vehicles. Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities.

b. The City of Salinas has adopted its Senate Bill 743 Vehicle Miles Traveled Implementation Policy in October 2020, which provides recommendations regarding VMT evaluation methodology, significance thresholds, and screening thresholds for land use projects. The school district does not have its own VMT policy and, therefore, City’s policy is used here, which is consistent with state guidelines.

The City’s vehicle miles traveled (VMT) policy screening thresholds are intended to identify when a project would be expected to cause a less than significant impact without conducting a detailed VMT evaluation. The thresholds are based on project size, estimated trip generation, maps, transit availability, and provision of affordable housing. According to the VMT assessment, the two thresholds applicable to the project are:

- Small projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less than significant impact on VMT; and
- Development that consists of local-serving essential services (considered to be less than 50,000 square feet in size and is a proposed day care center, public K-12 school, police or fire facility, medical/dental office building, or governmental services facility) may be assumed to cause a less than significant impact on VMT. All school activities (i.e., sports activities, school events, etc.) are presumed to be part of a high school's overall function and can thus also be assumed to be part of the less than significant impact on VMT consideration.

Unlike typical land uses such as residential and commercial, there is a significant variance in day-to-day project generated trips for a high school stadium. The stadium would generate the greatest number of trips when utilized for Friday night home football games, which would occur 4-6 times during only the football season. Significantly less vehicular traffic would be generated by non-football game use of the stadium on a daily basis. Therefore, calculating only the VMT generated during Friday game days would not accurately represent average weekday VMT generated by the stadium. Instead, the VMT assessment states that it's necessary to divide the total number of trips generated during a game week (i.e., the trips generated during a Friday football game) by the five weekdays to provide an average weekly trip and VMT estimates to reflect the average daily trip generation for the peak uses of the stadium (p. 6).

The proposed project is expected to result in an increase in attendance at football games and other sporting events. The increase in attendees will result in an increase in vehicular trips and VMT that is currently generated by the sporting events. The VMT assessment concluded that the average trip increase per day in the project area as a result of the project would range from 31 to 62 trips. Because this is less than 110 daily trips (per the City's screening threshold), it may be presumed that the project is a small project and, therefore, would be considered to have a less than significant impact on VMT. Additionally, the City VMT policy states that public K-12 schools may be presumed to have a less than significant impact on VMT since they provide a local-serving essential service. All school activities are presumed to be part of a high school's overall function. The proposed project consists of the addition of seating and lighting to an existing public high school and, therefore, can be considered to be a component of the high school and its local serving essential service consideration.

- c. The proposed project involves improvements to the existing stadium such as field lights, renovated/replaced spectator seating, new public address system, etc. These types of improvements would not increase hazards due to a geometric design feature or incompatible uses.
- d. There are three entrances and exits onto the school property from East Alvin Drive and four from Kip Drive. However, there are several locations along the southeastern and southwestern boundaries that are not proper entrances or exits, but can be used by emergency vehicles, if necessary.

The proposed project involves improvements to the existing stadium. However, none of these proposed improvements would result in any changes to the entrances or exits at the school. Therefore, the project would not result in inadequate emergency access.

18. TRIBAL CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. 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, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
(1) 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	☐	☒	☐	☐
(2) 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.	☐	☒	☐	☐

Comments:

- a. The CEQA statute as amended by Assembly Bill 52 (AB 52) (Public Resources Code Sections 21073 and 21074) defines “tribal cultural resources”, and “California Native American tribe” as a Native American tribe located in California that is on the contact list maintained by the Native American Heritage Commission. Public Resources Code Section 21080.3.1 outlines procedures for tribal consultation as part of the environmental review process. As indicated in Section A. Background of this this initial study, the school district received a response from the Indian Canyon Band of Costanoan Ohlone on April 12, 2023 expressing a desire for a tribal monitor and an archaeologist during all ground disturbing activities and recommended a cultural sensitivity training be held prior to any construction activities. However, the representative did not specifically request consultation with the school district pursuant to AB 52. Additionally, on May 5, 2023, a response was received from the Esselen Tribe of Monterey County requesting consultation with the school district pursuant to AB 52.

On May 11, 2023, the school district sent an e-mail response offering to set-up a consultation meeting with the Esselen Tribe of Monterey County. As of September 16, 2024, the school district received an acknowledgement of receipt response from the Esselen Tribe of Monterey County but no further response or request for consultation.

Mitigation measures CR-1, CR-2, and CR-3 in Section D.5, Cultural Resources, will reduce potential impacts on unknown buried tribal cultural resources within the site to a less-than-significant level should such resources be uncovered during earthmoving activities.

19. UTILITIES AND SERVICE SYSTEMS

Would the project:

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, storm water 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 inadequate 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?	☐	☐	☐	☒

Comments:

- a. The proposed project includes expanding on-site electrical infrastructure to the proposed new lights, the environmental impacts of which are addressed throughout this initial study. Otherwise, the project would not require relocation or construction of new or expanded water, wastewater treatment, storm water drainage, natural gas, and telecommunication facilities that would cause significant environmental effects.
- b. The proposed project could increase use of the athletic field resulting in an increase in spectators at events. However, this increase would not result in a substantial increase in water demand at the high school or impact the capacity of water supply facilities. No physical water system improvements would be necessary to serve the proposed project.

- c. The proposed project could increase use of the athletic field resulting in an increase in spectators at events. However, this increase would not result in a substantial increase in wastewater generation at the high school or impact the capacity of wastewater facilities. Therefore, there would be no impact on wastewater treatment facilities. No physical improvements would be necessary to serve the proposed project.
- d, e. The proposed project could increase use of the athletic field resulting in an increase in spectators at events. However, this increase would not result in a substantial increase in solid waste production that it would exceed the landfill capacity. No physical improvements to solid waste facilities would be necessary to serve the proposed project.

20. WILDFIRE

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

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than-Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of 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?	☐	☐	☐	☒

Comments:

- a-d. The project site is not located within or near a state responsibility area of lands classified as very high fire hazard severity zones (CAL FIRE 2023). Therefore, no further discussion is required.

21. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Measures Incorporated	Less-Than- Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; substantially reduce the number or restrict the range of an endangered, rare, or threatened species; 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?	☐	☐	☒	☐

Comments:

- a. As discussed in Section 4.0, Biological Resources, due to human disturbance and the lack of sensitive habitats at the project site, special-status plant and animal species are not expected to occur on the project site. There are also no sensitive natural communities at the project site and no wetlands or waters of the U.S. at the project site. While the lighting associated with the proposed project may cause the existing, active high school campus to be less attractive to nesting birds in the immediate vicinity, similar nesting habitat is located in the surrounding neighborhoods and higher quality habitat is available within regional vicinity, particularly along the Gabilan Creek corridor and agricultural or undeveloped areas surrounding the city. Potential impacts to nesting migratory birds and raptors as a result of increased light and glare are therefore considered less than significant.

Therefore, the project would not 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 an endangered, rare, or threatened species.

As described in Section 5.0, Cultural Resources, the project site does not consist of sensitive cultural and/or historic structures onsite and is not known to contain any historic or prehistoric resources. However, it is possible that these resources could be accidentally uncovered during grading and construction activities. In the event this should occur, implementation of Mitigation Measures CR-1, CR-2, and CR-3 would ensure that the potential impacts, should they occur, would not be significant.

- b. Proposed project impacts that contribute to cumulative project impacts are required to be mitigated per the measures presented in this initial study. Cumulative impacts associated with the proposed project include aesthetics (addition of nighttime lighting), air quality (increased CO emissions), and greenhouse gas emissions (increase in GHG emissions). With implementation of the mitigation measures identified herein, the project's contribution to cumulative project impacts would not be considerable.
- c. Based on the analysis provided in this initial study, the proposed project could indirectly cause adverse effects to human beings through air quality, greenhouse gas emissions, and noise. However, as discussed throughout this initial study, the impacts would not be significant. Therefore, the proposed project would not result in significant environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

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