

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044

From: (Public Agency): Robla School District (RSD)
5248 Rose Street
Sacramento, CA 95838

County Clerk
County of: Sacramento
3636 American River Drive, Suite 110
Sacramento, CA 95864

(Address)

Project Title: Main Avenue Elementary School Construction of PS/TK/K Classrooms

Project Applicant: Robla School District

Project Location - Specific:
1400 Main Avenue Sacramento, CA 95838

Project Location - City: Sacramento Project Location - County: Sacramento

Description of Nature, Purpose and Beneficiaries of Project:

The proposed project activities include the construction of six new classrooms for
Preschool (PS), Transitional Kindergarten (TK), Kindergarten (K), and a playground.

Name of Public Agency Approving Project: Robla School District

Name of Person or Agency Carrying Out Project:

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
Declared Emergency (Sec. 21080(b)(3); 15269(a));
Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
Categorical Exemption. State type and section number: 15302, 15303, 15304, 15314
Statutory Exemptions. State code number:

Reasons why project is exempt:

All aspects of the proposed project fall under one or more of the following Categorical
exemptions: Class 2: Replacement or Reconstruction, Class 3: New Construction or Conversion
of Small Structures, Class 4: Minor Alterations to Land, 14: Minor additions to Schools.

Lead Agency
Contact Person: Gerardo Castillo, CBO Area Code/Telephone/Extension: (916) 649-5248

If filed by applicant:

- 1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: Gerardo Castillo Date: 06/16/2025 Title: CBO

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR:

ENDORSED
SACRAMENTO COUNTY

JUN 20 2025

Revised 2011

DONNA ALLRED, CLERK/RECORDER
BY: Deputy DEPUTY

CEQA Notice of Exemption: Memorandum of Findings

Date: August 26, 2024

To: Main Avenue Elementary School
1400 Main Avenue Sacramento,
CA 95838

From: Kurt Schlyer
Universal Engineering Sciences
3600 Pegasus Drive, Suite 11
Bakersfield, CA 93308
Email: kschlyer@teamues.com

Subject: Main Avenue Elementary School Construction of new PS/TK/K Classrooms

The present memorandum substantiates the Main Avenue Elementary School Construction of new PS/TK/K Classroom exemption from environmental review requirements of the California Environmental Quality Act (CEQA) per CEQA Guidelines for Categorical Exemptions classes 2, 3, 4, and 14 (§15302 - Replacement or Reconstruction, §15303 - New Construction or Conversion of Small Structures, §15304- Minor Alterations to Land, and §15314- Minor Additions to Schools).

1.0 Project Location

Main Avenue Elementary School is at 1400 Main Avenue in Sacramento, Sacramento County, California. The school site is located along the southern side of Main Avenue. Approximately nine modular school buildings exist on the project site. A modular classroom is located north of the project site, while a playground and asphalt playground surface is east of the site. Associated school parking lots are located south and west of the project site.

2.0 Project Description

The proposed project would provide an addition of six new classrooms comprising of two preschool (PS), two transitional Kindergarten (TK), two Kindergarten (K) and a new PS playground. The proposed PS classrooms must meet the requirements outlined in Title 22 of the California Code of Regulations and the proposed TK/K classrooms must meet the 21st century classroom requirements. The addition of the six new classrooms and playground is proposed to be located on the west portion of Main Avenue Elementary School: adjacent to both the unpaved and asphalt paved playground areas located in the

center of the campus. The existing buildings are arranged in a "L" layout bordering the southwest school parking lot.

The total square footage of existing classrooms on campus is approximately 49,200 square feet. The proposed addition of the six (6) classrooms, each providing 1,350 square feet, to replace eight (8) existing modular classrooms, would reduce a total of 4,100 square feet. This new proposed PS/Tk/K classroom addition represents a less than one percent (.08%) decrease in instructional classroom space on the Main Avenue Elementary School Campus.

See Figure 1: Site Plan for new PS/Tk/K Classrooms and playground



3.0 Exempt Status

As lead agency, Robla School District (RSD) has determined that the project is categorically Exempt from further environmental review requirements under CEQA, pursuant to the exemptions described below. The RSD further finds that the project would not significantly impact the environment and that none of the exceptions enumerated in CEQA Guidelines §15300.2 are applicable.

APPLICABLE EXEMPTIONS

Class 2 - Replacement or Reconstruction

The Class 2 Categorical Exemption, as defined in CEQA Guidelines Section 15302, consists of the replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

Class 3 - New Construction or Conversion of Small Structures

The Class 3 Categorical Exemption, as defined in CEQA Guidelines Section 15303, consists of the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure.

Class 4 - Minor Alteration to Land

The Class 4 Categorical Exemption, as defined in CEQA Guidelines Section 15304, consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry and agricultural purposes.

Class 14 - Minor Additions to Schools

The Class 14 Categorical Exemption, as defined in CEQA Guidelines Section 15314, consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

FINDINGS

Class 2 - Replacement or Reconstruction

The proposed project includes the construction of six new classroom facilities approximately 1,350 square feet each in size, along with a new playground, to replace eight (8) existing modular classrooms on the west portion of campus adjacent to the existing unpaved and asphalt paved playground areas located in the center of the campus. The new classrooms will serve substantially the same purpose and capacity as the existing classrooms to be replaced. It, therefore, is exempt from CEQA under CEQA Class 2 Categorical Exemption.

Class 3 - New Construction or Conversion of Small Structures

The proposed project includes the construction of six new classroom facilities with each classroom structure being no less than 1,350 square feet in size located along the western boundary of the campus. A new playground is also to be constructed between the new PS and TK classrooms. It, therefore, is exempt from CEQA under CEQA Class 3 Categorical Exemption.

Class 4 - Minor Alteration to Land, and Class 14- Minor Additions to Schools

A portion of the project consists of constructing a new playground between the PS and TK classrooms. Installation of the new playground would involve minor grading and landscaping for proper installation. This anticipated installation on the existing campus constitutes: "minor public or private alterations in the condition of land" "which do not involve removal of healthy, mature, scenic trees "and is, therefore exempt from CEQA under Class 4.

Class 14- Minor Additions to Schools

The proposed project includes the construction of six new classrooms to complete Main Avenue's Elementary School existing PS/TK/K facilities. The addition of the classroom facilities constitute: "placement of minor structures accessory to existing institutional facilities"; and "minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms" and is, therefore, exempt from CEQA under Class 14.

EXCEPTIONS TO CATEGORICAL EXEMPTIONS

CEQA Guidelines Section §15300.2 identifies exceptions or conditions under which categorical exemptions do not apply. The exceptions that are relevant to consideration under Class 2, 3, 4, and 14, are:

Location: The Class 2, 3, 4, and 14 exemptions are qualified by consideration of where the project is to be located - a project that is ordinarily insignificant in its impact on the environment may, in a particularly sensitive environment, be significant. Therefore, Class 2, 3, 4, and 14 exemptions apply in all instances, except where the project may impact an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

Cumulative Impact: The exemptions would be inapplicable if the cumulative impact of successive projects of the same type in the same place is significant.

Significant Effect: A Categorical Exemption shall not be used for an activity where there is a reasonable possibility that the activity will result in the loss of a significant resource or the degradation of a significant resource.

Scenic Highways: A Categorical Exemption shall not be used for a project that may damage scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements required as mitigation by an adopted negative declaration or certified EIR.

Hazardous Waste Sites: A Categorical Exemption shall not be used for a project on a site included on any list compiled pursuant to Section 65962.5 of the Government Code.

Historical resources: A Categorical Exemption shall not be used for a project that may cause a substantial adverse change in the significance of a historical resource.

The following discussions evaluate whether these exceptions to the CEQA Categorical Exemption classes 2, 3, 4, and 14 would apply to the proposed project.

Location

The proposed project site is a built-out elementary school campus in an intensive truck yard area in Sacramento's Sphere of Influence (SOI). No environmental resources of critical concern- such as threatened or endangered species or habitats thereof or critical habitat designated by the US Fish and Wildlife Service pursuant to the federal Endangered Species Act- are present onsite (USFWS 2024a; USFWS 2024b). Main Elementary School is not a hazardous materials site (see Hazardous Waste Sites below). The Location exception does not apply to the proposed project.

Cumulative Impacts

The proposed project activities include constructing six new additional classrooms for PS/TK/K and a playground. These uses are consistent with the existing uses. Due to the limited scope of building modifications (during construction and operation) and consistency with allowable site uses, the proposed project would not result in significant cumulative impacts. The proposed project would continue to operate 1 mile southeast of Robla School District. Therefore, this exception does not apply.

Significant Effect/Unusual Circumstances

No unusual circumstances on or next to the school would cause significant environmental impacts. No unusual circumstances are anticipated with the project construction. The

nearest sensitive receptors to noise and hazardous air emissions are residential homes adjoining the campus to the west located approximately 90 feet, 500 feet to the east, 300 feet to the north, and a church 350 feet to the south of the proposed project site. Project construction and operation would not cause any unusual circumstances resulting in significant environmental impacts. The significant effects exception does not apply to the proposed project.

Scenic Highways

The nearest designated State Scenic Highway are State Route (SR) 128 and 49, approximately twenty-nine (29) miles west and thirty-one (31) miles east of the proposed project site, respectively. Project development would not damage scenic resources along SR 128 and 49. Therefore, the Scenic Highways exception does not apply to the proposed project.

Hazardous Waste Sites

According to 14 CCR 15300.2(e), "[a] categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code." According to the California Department of Toxic Substances Control (DTSC) ENVIROSTOR database, three (3) school investigations sites were located near the proposed project site- approximately 1 mile to the southwest and southeast (DTSC 2024a). These schools investigation's statuses are listed as no further action required. Therefore, the proposed project would not result in any activities that would disturb or release hazardous materials from known hazardous waste sites. Therefore, this exception does not apply.

Historical Resources

The Main Avenue Elementary School is not listed on the California Register of Historical Resources (OHP 2024) or the National Register of Historic Places (NPS 2024); therefore, it is not a historical resource under CEQA. Additionally, the project constructions and structural additions would not result in adverse changes to the existing developed site. No known historic archaeological resources are located at the proposed project site, and no impact related to historical resources would occur. The proposed project would not impact historical resources, and this exception does not apply.

4.0 Conclusion

The proposed project would provide an addition of six new classrooms including two preschool (PS), two transitional Kindergarten (TK), two Kindergarten (K) and a

playground. As demonstrated in this Notice of Exemption (NOE), the Robla School District has determined that the Main Avenue Elementary School Project is exempt from environmental review under CEQA pursuant to the provisions of CEQA Guidelines for Categorical Exemptions §15302- Replacement or Reconstruction, §15303- New Construction or Conversion of Small Structures, §15304 - Minor Alterations to Land, §15314- Minor Additions to Schools.

5.0 References

California Department of Toxic Substance Control. 2024a. Envirostor - Hazardous Waste and Substances Site List. Available: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1400+main+avenue%2C+sacramento%2C+ca>

California Department of Transportation (Caltrans). 2024, August 22 (accessed). California Highway System. Available: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

County of Sacramento General Plan 2040 Land Use Map. Available: <https://www.arcgis.com/home/webmap/viewer.html?layers=ff85c31ca94e4a0092f6a0158ad328e2>

City of Sacramento Zoning Map. Available: https://experience.arcgis.com/experience/426bbcca678342c6abf3855df7e0dc1a#data_s=id%3Awidget_21_output_config_2%3A0%2Cid%3AAbd59b4d1b1c74bc09a722bb1f4593e06-Parcels_2044%3A393775

Robla School District (RSD). 2024. Request for Statement of Qualifications and Proposals: Lead, Asbestos, Hazardous Materials Testing/ DTSC compliance services for new Preschool, Transitional Kindergarten, and Kindergarten classrooms at Main Avenue Elementary School.

Office of Historic Preservation. 2024, August 22 (accessed). California Historical Resources. Sacramento County. Available: <https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=34>

National Park Service (NPS). 2024, August 22 (accessed). National Register of Historic Places. Available: <https://www.nps.gov/subjects/nationalregister/database-research.htm>

Universal Engineering Sciences (UES). 2024. Phase I Environmental Site Assessment: 1400 Main Avenue Sacramento, CA 95838 Sacramento County APN: 237-0060-011-0000

U.S. Fish & Wildlife Services (USFWS). 2024a, August 22 (accessed). Critical Habitat for Threatened and Endangered Species. Available: <https://fws.maps.arcgis.com/apps/mapviewer/index.html?layers=794de45b9d774d21aed3bf9b5313ee24>