Antioch Unified School District

ORCHARD PARK SCHOOL CAMPUS
BUILDINGS AND SITE IMPROVEMENTS

July 2026 | CEQA Exemption Memorandum

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for Antioch Unified School District

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1. INTRODUCTION

Article 19 (Categorical Exemptions) of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084 (List of Exempt Classes of Projects; Projects Damaging Scenic Resources), a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are exempt from review under CEQA. This document has been prepared to demonstrate CEQA compliance as it pertains to the Orchard Park School Campus Buildings and Site Improvements (proposed project) and provides information to decision makers regarding a finding that the proposed project is exempt under CEQA.

This document describes how the proposed project qualifies for a Class 2 CEQA Exemption pursuant to CEQA Guidelines, Section 15302, Replacement or Reconstruction, which 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. The proposed project also qualifies for a Class 14 CEQA Exemption pursuant to CEQA Guidelines, Section 15314, Minor Addition to Schools, which consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25 percent or 10 classrooms, whichever is less.

In addition, this document demonstrates that none of the exceptions to categorical exemptions apply pursuant to CEQA Guidelines, Section 15300.2, Exceptions, which include the following:

(a) the project is not located within a sensitive environment;

(b) there would be no cumulative impacts;

(c) there would be no significant effects on the environment due to an unusual circumstance;

(d) there would be no impacts to a scenic highway;

(e) the project site is not located on a hazardous waste site; and

(f) there would be no impacts to historical resources.

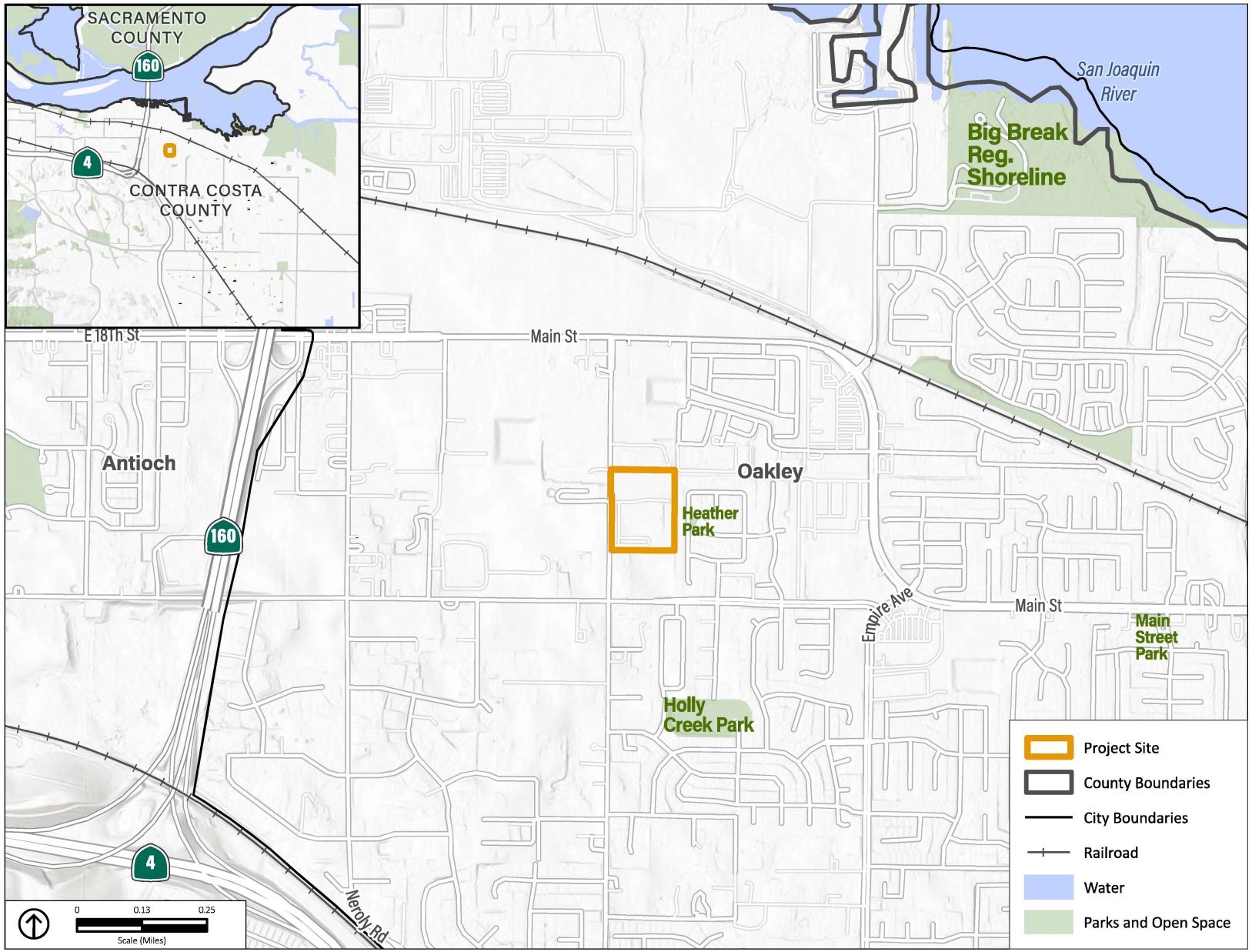
2. PROJECT DESCRIPTION

Antioch Unified School District (District) is proposing campus improvements at the Orchard Park School, including constructing a new gymnasium and multi-purpose room (MPR) building; modernizing the existing MPR ("Building M") into new classrooms, preparation rooms, and offices; creating a new drop-off area; creating new exterior sports courts; and other site improvements. A detailed description of the improvements is provided in Section 2.4, *Proposed Project*.

2.1 PROJECT LOCATION

The new buildings and site improvements at Orchard Park School (project site) are proposed in the northwest portion of the Orchard Park School campus (campus). The campus is at 5150 Live Oak Avenue in the City of Oakley, in Contra Costa County, and is situated on two parcels identified as Assessor's Parcel Numbers (APNs) 037-100-003 and 037-100-016. Oakley is approximately 40 miles northeast of the city and county of San Francisco and 35 miles south of the city of Sacramento, surrounded by the San Joaquin River and Big Break Regional Shoreline to the north, the city of Brentwood to the east and south, and the city of Antioch to the west, as shown on Figure 1, *Regional and Vicinity Map.* The campus is bordered by industrial development (operated by UPS) to the north, residential development to the east, residential development to the south, and Live Oak Avenue to the west with agricultural land across the street. Most of the city consists of low-density residential neighborhoods. Additionally, the campus is one mile west of downtown Oakley.

Regional access to the project site is provided by State Route (SR-) 160, approximately 0.7 mile west of the project site, and SR-4, approximately 1 mile southwest of the project site. Entrance to the campus is provided from the parking lot entrance at the southwest corner of campus along Live Oak Avenue, with an exit lane from the parking lot at the northwest corner of campus along Live Oak Avenue.



Source: ESRI, 2026; PlaceWorks, 2026

Figure 1
Regional and Vicinity Map

2.2 EXISTING SITE CONDITIONS

The project site is an existing school campus that currently serves students in transitional kindergarten (TK) through eighth grade. The campus includes 12 permanent and portable classroom buildings housing a total of 32 classrooms. In the 2025 to 2026 school year, the campus served 763 students (AUSD 2025).

In addition to instructional spaces, the campus includes a portable library, portable administration building, multi-purpose hall and cafeteria, play areas, and a grass field. The existing site conditions are shown in Figure 2, *Aerial View of the Project Site*.

2.3 LAND USE AND ZONING DESIGNATIONS

The project site is designated Light Industrial in the Oakley General Plan and is zoned as Public and Semi-Public (P) and Light Industrial (LI) (Oakley 2022, 2026a). The Light Industrial land use designation allows for industrial and public/semi-public uses, such as schools (Oakley 2022).

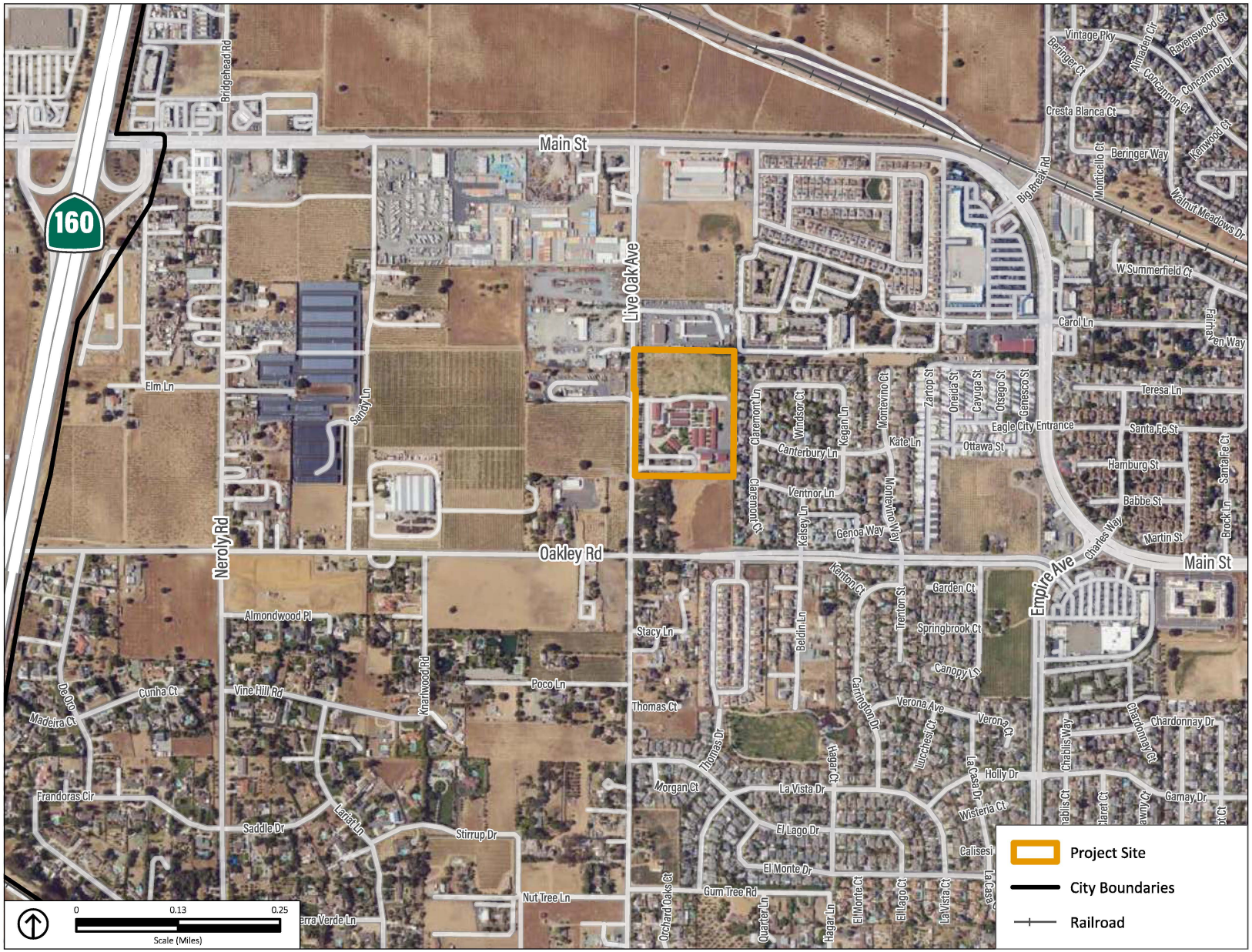
2.4 PROPOSED PROJECT

The District proposes to construct new school buildings and facilities, modernize an existing building, create new exterior sports courts, and other associated site improvements in the northern section of the campus, as shown on Figure 3, *Site Plan*. No building demolition is included in the proposed project.

2.4.1 Buildings and Facilities

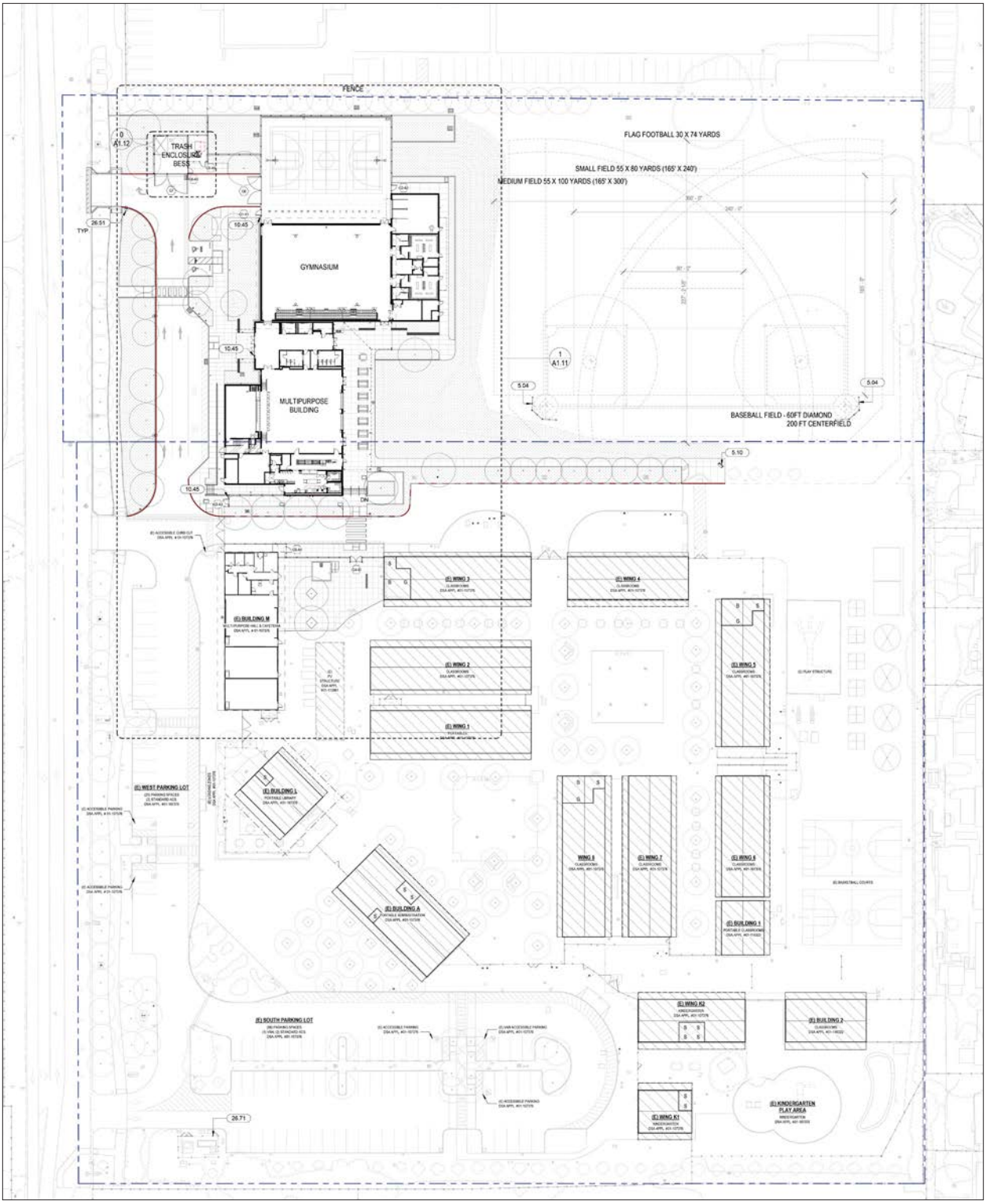
The proposed project includes the construction of a new single-story gymnasium with restrooms, a fitness room, locker rooms, offices, and a storage room. The gymnasium and ancillary rooms would total approximately 9,000 square feet. The proposed project also includes the construction of a new MPR building with a kitchen, servery, office, storage room, and a raised stage platform. The MPR and ancillary spaces would total approximately 10,500 square feet. A covered outdoor dining area would be provided outside to the east of the MPR. A new lobby with additional restrooms would connect the gymnasium and MPR, totaling approximately 1,080 square feet. New exterior sports courts and sports fields would be constructed as well.

In addition, the proposed project includes internal renovations of the existing MPR building, Building M, to create three classrooms, two offices, and custodial rooms.



Source: ESRI, 2026; PlaceWorks, 2026

Figure 2
Aerial View of the Project Site



Source: HKIT Architects, 2025.

Figure 3
Site Plan

2.4.2 Site Improvements

The proposed project includes new landscaping, pedestrian pathways, accessibility upgrades, and associated site work. A trash enclosure would also be constructed at the northwest corner of campus.

2.4.3 Electrical Upgrades

The proposed project would include an expanded photovoltaic (PV) system with a new battery energy storage system (BESS). The BESS would be adjacent to the trash enclosure at the northwest corner of campus.

2.4.4 Circulation and Parking

The proposed project includes the construction of a new student pick-up and drop-off area to extend the existing area past the new gymnasium and MPR building to a new site access point along Live Oak Avenue, near the northwest corner of the project site. The new pick-up and drop-off area would also include two new accessible parking spots.

2.4.5 Operations

The proposed project would not increase student capacity, and the campus would continue to operate as a TK through eighth-grade school. No substantial changes to daily operations, such as operational hours or staffing, are proposed.

2.4.6 Construction Schedule

Construction of the proposed project is anticipated in two phases over approximately 16 months. Construction is anticipated to begin in fall 2026. Construction is anticipated to be complete by winter 2027 .

All construction activities would comply with applicable local regulations, including construction noise standards. Construction activities would include grading, building construction, landscaping, and site improvements. Construction would stay within the boundaries of the existing school property. During construction, the contractor would maintain safe access throughout the campus, including emergency access, and coordinate activities with the District to minimize disruption to ongoing school operations. Normal school operations would continue during construction.

The proposed project would be subject to review and approval by the California Division of the State Architect (DSA) prior to construction.

3. EXEMPTIONS

As stated in Section 1, Introduction, Article 19 of the CEQA Guidelines includes a list of classes of projects that have been determined not to have a significant effect on the environment and so are exempt from review under CEQA. This document has been prepared to show that the proposed project complies with CEQA and to demonstrate that the project qualifies for Class 2 and Class 14 CEQA Exemptions, consistent with the provisions of CEQA Guidelines Sections 15302, 15314, and 15300.2. Specifically, the information provided shows that:

- The proposed project qualifies for an exemption under CEQA Guidelines Section 15302 and would not have a significant effect on the environment.
- The proposed project qualifies for an exemption under CEQA Guidelines Section 15314 and would not have a significant effect on the environment.
- No exceptions to the Replacement or Reconstruction or Minor Addition to Schools exemptions in CEQA Guidelines Section 15300.2 apply to the proposed project.

3.1 SECTION 15302: REPLACEMENT OR RECONSTRUCTION CONSISTENCY

Class 2 consists of 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.

The renovation of the existing MPR is consistent with a Class 2, Replacement or Reconstruction CEQA Exemption, because it would construct a new MPR building to replace the existing MPR building, which would be renovated and used for classrooms. The new structure would be located on the same project site as the structure replaced and would have substantially the same purpose (educational operations) and capacity as the structure replaced. Because the new MPR building would be located within the same project site as the existing MRP and would have substantially the same purpose and capacity, this qualifies for the exemption under Section 15302.

3.2 SECTION 15314: MINOR ADDITION TO SCHOOLS CONSISTENCY

Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity of the school campus by more than 25 percent or 10 classrooms, whichever is less.

The proposed project would occur within the existing campus. The campus currently contains 32 classrooms. The proposed project would result in a net increase of 3 permanent classrooms, for a total of 35 classrooms. This net increase is below the threshold of 10 classrooms. Additionally, student enrollment is not projected to increase (AUSD 2026).

The proposed project includes the construction of a new gymnasium, MPR, and exterior sports courts that are ancillary school facilities to support educational operations. The proposed project also includes circulation and parking improvements and site improvements throughout the campus, including new landscaping and pedestrian pathways. All improvements are entirely within the existing school grounds. Therefore, the proposed project qualifies for this exemption under CEQA Guidelines Section 15314.

4. EXCEPTIONS

The proposed project has been reviewed under CEQA Guidelines Section 15300.2, Exceptions, for any characteristics or circumstances that might invalidate findings that the proposed project is exempt from CEQA. Each exception is listed below followed by an assessment of whether that exception applies to the proposed project.

4.1 SECTION 15300.2(A): LOCATION

> Classes 3, 4, 5, 6, and 11 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, these classes are considered to apply to 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.

The location exception under Section 15300.2(a) applies specifically to Classes 3, 4, 5, 6, and 11. The proposed project relies on Classes 2 and 14, to which this exception does not expressly apply. The proposed project is entirely within the existing school site, a developed institutional site in a residential and agricultural area of the city. As described below, the project site is not in a designated sensitive environmental resource area of hazardous or critical concern pursuant to state, federal, or local law. Therefore, this exception does not apply to the proposed project.

4.2 SECTION 15300.2(B): CUMULATIVE IMPACT

> All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The proposed project is not part of a series of successive projects of the same type in the same place. The project involves the modernization of existing school buildings and construction of new buildings within an existing campus, which is a single, discrete undertaking to address the District's long-term programmatic and facility needs. The proposed project would not lead to an increase in student enrollment. The proposed project improvements are limited to the project

site and would not combine with any other project to create cumulative impacts. The planned development in the surrounding neighborhood includes the expansion of an existing UPS facility at 5300 Live Oak Avenue, condominiums at 5400 Live Oak Avenue, single family residential units at 2371 Oakley Road, and single-family residential units at 2480 Oakley Road (Oakley 2026b). Each project would be required to comply with existing federal, state, and local regulations and implement construction best management practices to ensure that simultaneous development projects would not combine with the proposed project to create significant cumulative impacts. Therefore, this exception does not apply to the proposed project.

4.3 SECTION 15300.2(C): SIGNIFICANT EFFECT

> A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

The determination whether this exception applies involves two distinct questions: (1) whether the project presents unusual circumstances and (2) whether there is a reasonable possibility that a significant environmental impact will result from the unusual circumstances. The lead agency considers the second prong of this test only if it finds that some circumstance of the project is unusual (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1104).

The proposed project does not present unusual circumstances nor any environmental constraint that might result in a significant impact. The campus has operated as a TK through eighth grade school since 2007 in a developed, suburban area of the city (DOE 2026). The proposed project involves the addition of a new gymnasium and MPR building, modernization of the existing MPR building, new sports courts, and other site improvements using standard construction methods, all within the existing school property. Construction would be required to comply with applicable building codes, DSA requirements, air quality standards, water quality standards, inadvertent discovery procedures, and best management practices. Work within the public right of way would be reviewed and approved by the City of Oakley Public Works Department.

The proposed project would include the extension of the pick-up and drop-off area along the western side of the campus. This would provide a new site access point along Live Oak Avenue near the northwest corner of the project site, which would slightly change the circulation on Live Oak Avenue.

The proposed BESS is required in compliance with the 2022 Energy Code and would not be considered an unusual circumstance of the proposed project, as it is required by CCR, Title 24, Part 6, Section 140.10. Assuming the BESS generates a noise level of 70 dBA at 3 feet, which is anticipated given the specifications of the BESS, the noise level at the nearest sensitive receptor 140 feet from the proposed BESS unit, would be 37 dBA. Therefore, noise associated with the proposed project, including the BESS, would not result in an exceedance of applicable noise standards as included in Table 9-7, *Noise Level Performance Standards for New Projects Affected By or Including Non-Transportation Noise Sources*, of the Oakley General Plan Noise Element given the anticipated noise generation and distance to sensitive receptors (Oakley 2022). The proposed project would not lead to an increase in student enrollment, and operation of the campus following project completion would not substantially differ from existing conditions or operations.

The U.S. Forest Service (USFS) "Existing Vegetation: Region 05" mapping program classifies the project site as urban, shrub, and herbaceous, and the campus is surrounded by urban classifications (USFS 2026). Urban land tends to have low to poor wildlife habitat value due to replacement of natural communities, fragmentation of remaining open space areas and parks, and intensive human disturbance. The project site is in an urban area with limited access to natural areas and associated wildlife habitat. Additionally, the United States Fish and Wildlife Service does not identify any wetlands on the project site (USFWS 2026).

Therefore, the proposed project would not result in a significant environmental impact and would not result in any unusual circumstances, and this exception does not apply to the proposed project.

4.4 SECTION 15300.2(D): SCENIC HIGHWAYS

> A categorical exemption shall not be used for a project which may result in damage to 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.

According to the California Department of Transportation (Caltrans) California Scenic Highway Mapping System, the nearest officially designated state scenic highway to the project site is a segment of SR-160 approximately 2 miles northwest of the project site, and the nearest eligible state scenic highway to the project site is a segment of SR-160 approximately 0.7 mile west of the project site (Caltrans 2026). Due to distance and intervening development, the project site would

not be visible from either segment of SR-160. Therefore, the proposed project would not affect scenic resources along any officially designated or eligible scenic highways, and this exception does not apply to the proposed project.

4.5 SECTION 15300.2(E): HAZARDOUS WASTE SITES

> 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.

California Government Code Section 65962.5 requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities subject to corrective action; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; leaking underground storage tanks (LUST); and solid waste disposal facilities from which hazardous waste has migrated. The required lists of hazardous material release sites are commonly referred to as the "Cortese List," named for the author of the legislation. The project site is not on the Hazardous Waste and Substances Site List (Cortese) pursuant to Government Code Section 65962.5 (CalEPA 2026a).

The following environmental databases were searched for hazardous materials sites on the project site:

- EnviroStor. Department of Toxic Substances Control (DTSC 2026)
- GeoTracker. State Water Resources Control Board (SWRCB 2026)
- Solid Waste Facilities. Cortese List (CalEPA 2026b)
- Site Cleanup Program. Cortese List (CalEPA 2026c)
- Hazardous Waste facilities subject to Section 25187.5 of the Health and Safety Code. Cortese List (CalEPA 2026d)

The database search did not identify any hazardous materials sites on the project site. As a result, the project site is not identified as an active hazardous materials site pursuant to Government Code Section 65962.5. Thus, this exception does not apply to the proposed project.

4.6 SECTION 15300.2(F): HISTORICAL RESOURCES

> A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Under Public Resource Code Section 21084.1, a historical resource is a resource listed in or determined to be eligible for listing in the California or National Register of Historical Resources. Additionally, historical resources included in a local register of historical resources are presumed to be historically or culturally significant, and a lead agency can determine whether the resource may be a historical resource.

There are no officially designated historic structures in the city (NPS 2026; Oakley 2022; OHP 2026). Though not individually recognized, historic resources in the city are concentrated in the "old town" area, approximately 1.5 miles southeast of the project site. Various historical farm buildings are also noted throughout the city (Oakley 2022). The project site does not contain any historic farm buildings. Therefore, this exception does not apply to the proposed project.

5. CONCLUSION

As discussed in Section 3, *Exemptions*, the proposed project meets the criteria for categorical exemptions using Class 2 and Class 14 in CEQA Guidelines Sections 15302 and 15314, respectively. Additionally, as explained in Section 4, *Exceptions*, none of the exceptions to the categorical exemptions in CEQA Guidelines Section 15300.2 apply, and the proposed project would not have a significant effect on the environment.

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