

Antioch Unified School District

FREMONT ELEMENTARY SCHOOL CAMPUS BUILDINGS AND SITE IMPROVEMENTS

July 2026 | CEQA Exemption Memorandum



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for Antioch Unified School District

Antioch Unified School District

Contact: Miguel Cruz, Director of Facilities
701 West 18th Street
Antioch, CA 94509
925.352.6850

Prepared by:

PlaceWorks

Contact: Rachel Goren, Associate
2040 Bancroft, Suite 400
Berkeley, California 94704
510.848.3815
www.placeworks.com

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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 Fremont Elementary 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 Fremont Elementary School, including constructing a new transitional kindergarten/kindergarten (TK/K) classroom building, administration building, multipurpose room (MPR) building, TK/K and 3rd through 5th grade playgrounds, grass turf field, two drop-off areas with parking, 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 Fremont Elementary School (project site) are proposed in the southwest and northeastern portion of the Fremont Elementary School campus (campus). The campus is at 1413 F Street in the City of Antioch, in Contra Costa County, California, and is on a parcel identified as Assessor's Parcel Number (APN) 067-110-001. Antioch is approximately 33 miles northeast of the City and County of San Francisco, and 35 miles southwest of the City of Sacramento, surrounded by the San Joaquin River to the north, the City of Oakley and City of Brentwood to the east, Black Diamond Mines Regional Preserve in unincorporated Contra Costa County to the southwest, and the City of Pittsburg to the west; see Figure 1, *Regional and Vicinity Map*. The campus is bordered by W 13th Street to the north, D Street to the east, Antioch Middle School to the south, and F Street to the west. The project site is surrounded by residential development to the north, east, and west. The Burlington Northern Santa Fe (BNSF) Railway is 0.3 miles south of the project site.

Regional access to the project site is provided by State Route (SR-) 4, approximately 0.6 miles south of the project site, and SR-160, approximately 3 miles east of the project site. Current student drop-off and pick-up and entrance to the campus is provided from a shared parking lot at Antioch Middle School, just beyond the southern project boundary, along D Street.

FREMONT ELEMENTARY SCHOOL CAMPUS BUILDINGS AND SITE IMPROVEMENTS
ANTIOCH UNIFIED SCHOOL DISTRICT

2. PROJECT DESCRIPTION

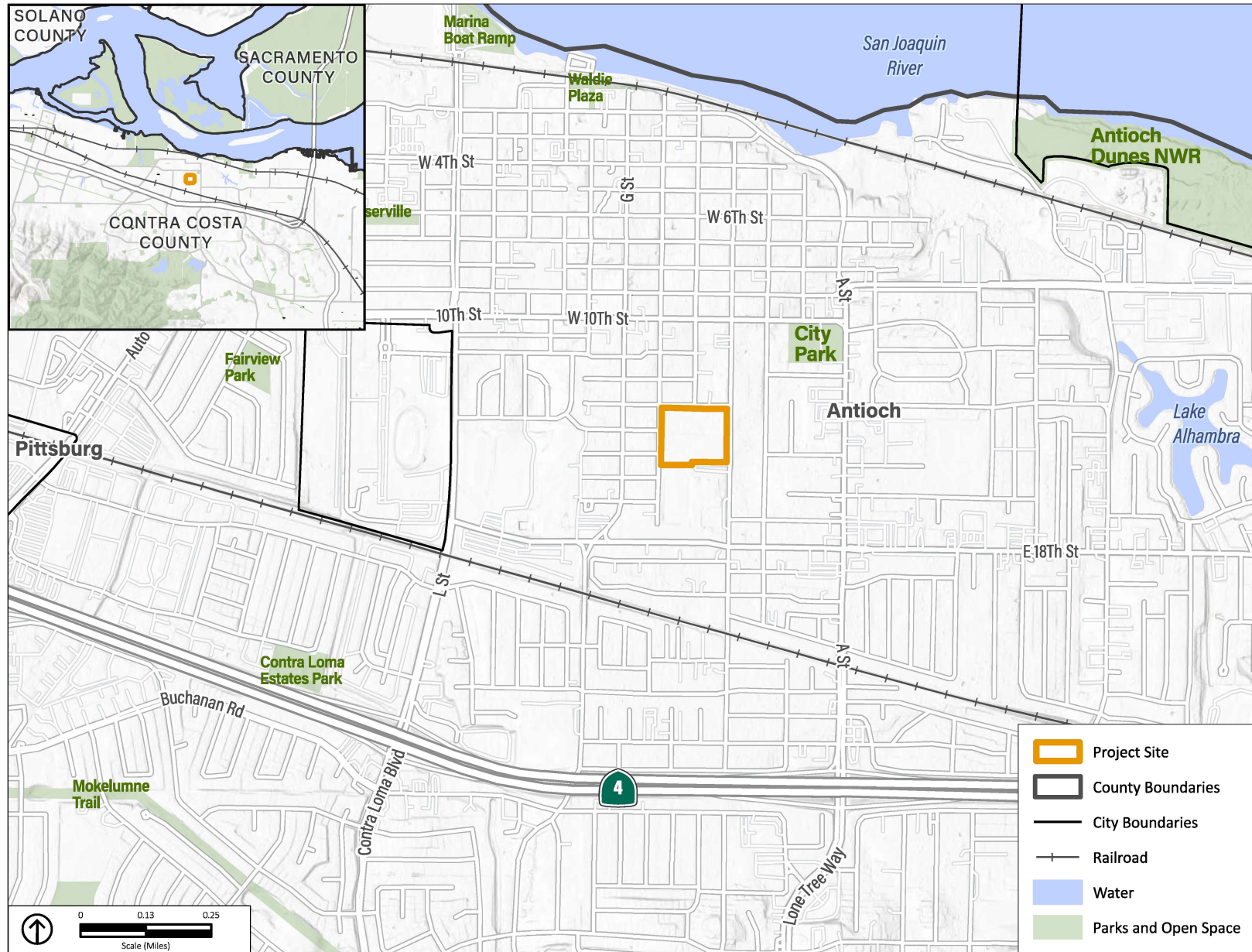


Figure 1
Regional and Vicinity Map

2.2 EXISTING SITE CONDITIONS

The project site is an existing school campus that currently serves students in TK through 5th grade. The campus includes 26 permanent classrooms and 4 portable classrooms, for a total of 30 classrooms. In the 2025 to 2026 school year, the campus served 518 students (AUSD 2025). In addition to instructional spaces, the campus includes a library, administration building, MPR building, 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 Public/Institutional in the City of Antioch (City) General Plan and is zoned as Single-Family Residential District (R-6) (Antioch 2003a, 2026a). The Public/Institutional land use designation allows for schools and educational facilities (Antioch 2003a).

2.4 PROPOSED PROJECT

The District proposes to demolish six total buildings, including the existing administrative building, MPR building, and four portable classrooms. The District also proposes to construct a new administration building, MPR building, TK/K classroom building, TK/K and 3rd through 5th grade playgrounds, grass turf field, two drop-off areas, and two parking lots, as shown on Figure 3, *Site Plan*. Buildings proposed to be demolished are shown in Figure 4, *Demolition Plan*.

2.4.1 Buildings and Facilities

The new, single-story TK/K classroom (Building G) would be near the southwest corner of campus and would be approximately 5,000 square feet with restrooms and a teacher's workroom. The new, single-story administration building (Building E) would be near the northeast corner of campus and would be approximately 3,500 square feet with a staff lounge, offices, storage rooms, and restrooms. The new, single-story MPR building (Building F) would be directly south of the new administration building and would be approximately 7,750 square feet with a main multipurpose space, restrooms, offices, kitchen, server, storage rooms, and a raised stage platform. An outdoor dining area would be provided outside of the MPR to the west of the building. Two new exterior playgrounds and a grass turf play area would be constructed in the southern part of campus.

2. PROJECT DESCRIPTION

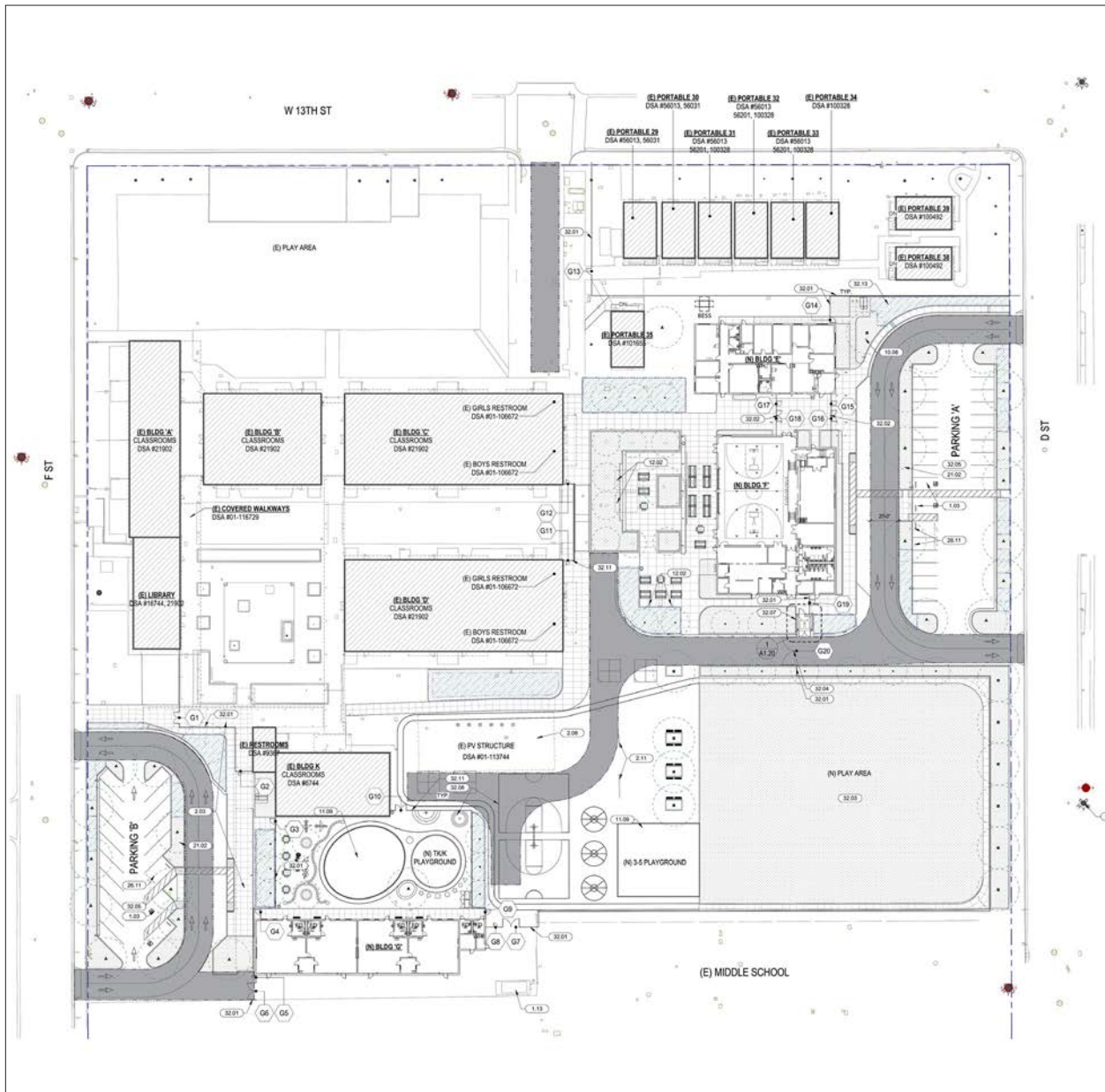


Source: ESRI, 2026; PlaceWorks, 2026

Figure 2
Aerial View of the Project Site

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2. PROJECT DESCRIPTION



Source: HKIT Architects, 2025.

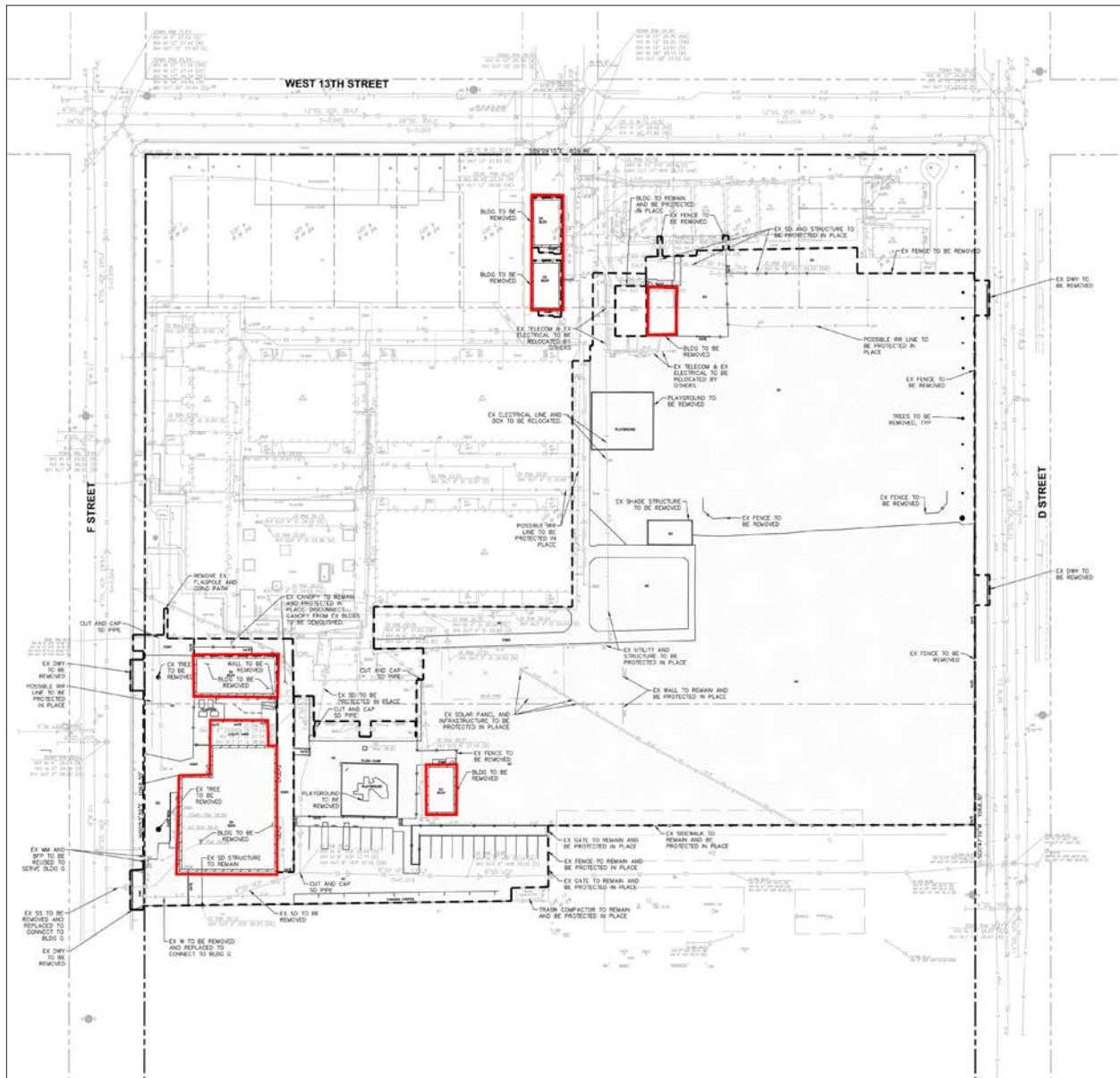


LEGEND - SITE PLAN

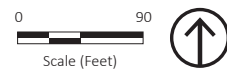
	PROPERTY LINE		20' FIRE APPARATUS ACCESS (CFC 503.1.1)
	ROOF OVERHANG		CONCRETE PAVING, S.C.D. & S.L.D.
	FIRE HYDRANT		LANDSCAPING, S.C.D. & S.L.D.
	(E) BUILDING - NOT IN SCOPE		BIORETENTION, S.C.D. & S.L.D.

Figure 3
Site Plan

2. PROJECT DESCRIPTION



Source: HKIT Architects, 2025.



LEGEND:

- Property Line
- Demolition Area, see note 1 and note 2
- Buildings to be demolished

Figure 4
Demolition Plan

2.4.2 Site Improvements

The proposed project would include new landscaping, pedestrian pathways, paved play striping, and associated site work throughout the 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 north of the proposed administration building (Building E) near the northeast corner of campus.

2.4.4 Circulation and Parking

The project includes the construction of two new student drop-off areas and parking lots. Parking Area A would be at the eastern edge of campus along D Street, with two lanes provided for ingress at the northeastern corner of the campus and egress provided at the eastern boundary. Parking Area B would be at the southwest corner of campus, along F Street, and be used primarily for TK/K students, with two lanes provided for ingress at the southwestern corner of the project site and two lanes provided for egress just to the west of the existing Building K. The proposed drop-off area and parking lots would create new site access points for the campus and would allow the Antioch Middle School parking area, currently providing shared parking with Fremont Elementary School to be used solely for Antioch Middle School.

2.4.5 Operations

The proposed project would not increase student capacity, and the campus would continue to operate as a TK through 5th 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 to occur in two phases over approximately 24 months. Phase one would include site preparations and the construction of the new administrative and MPR buildings, as well as the development of a new drop-off area and parking lot (Parking Area A) off D Street. Phase two would include the demolition of the existing administrative and MPR buildings, the construction of the new TK/K building and associated site improvements, and the construction of a new TK/K drop-off area and parking lot (Parking Area B)

2. PROJECT DESCRIPTION

off F street. Construction is anticipated to begin in winter 2026 with anticipated completion by winter 2028.

All construction activities would comply with applicable local regulations, including construction noise standards. Construction activities would include building demolition, grading, building construction, landscaping, and site improvements. Construction would occur 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, as a result, 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 a Class 2 and Class 14 CEQA Exemption, 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, as a result, would not have a significant effect on the environment.
- The proposed project qualifies for an exemption under CEQA Guidelines Section 15314 and, as a result, would not have a significant effect on the environment.
- No exceptions to the Replacement or Reconstruction or Minor Addition to Schools exemptions, as set forth 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 on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The proposed project qualifies for a Class 2, Replacement or Reconstruction CEQA Exemption, as it would replace the existing administrative building, MPR, and classrooms that would be demolished as part of the proposed project with new structures. The new structures would be on the same project site as the structures replaced and would have substantially the same purpose (educational operations) and capacity as the structures replaced. The proposed project would demolish four portable classrooms and add four new permanent classrooms. The total number of classrooms campus-wide would not change and there would be no expansion in use relative to the existing educational use. All new development would be sited entirely within the existing school property. Because the new administrative building, MPR, and classrooms would be within the same project site as the existing structures replaced and would have substantially the same purpose and capacity, the proposed project qualifies for an exemption under CEQA Guidelines 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 30 classrooms. The proposed project would replace portable classrooms with permanent ones and would not result in an increase in total classrooms. Additionally, student enrollment is not projected to increase (AUSD 2026).

The proposed project includes the construction of a new administrative building, MPR building, and playgrounds to support educational operations. The proposed project also includes circulation and parking improvements and site improvements throughout the campus, including new landscaping, pedestrian pathways, and pick-up/drop-off areas. All improvements would be 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 within a residential area of the City. As described herein, the project site is not within 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 replacement of existing school 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 or visitors. The proposed project improvements are limited to the project site and would not combine with any other project to create cumulative impacts. Additionally, there are currently no

planned development projects surrounding that project site that would lead to a cumulative impact. The closest planned development is a residential development on H Street, 0.4 miles northwest of the project site (Antioch 2026b). 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 5th grade school since 1980 in a developed residential area of the City (DOE 2026). The proposed project involves the replacement of the existing administrative building, MPR building, and classroom buildings with new structures, two new playgrounds, two new drop-off and parking lot locations, 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. The proposed project would include two new student drop-off areas and parking lots, which would slightly change circulation along D Street and F Street. Work within the public right-of-way would be reviewed and approved by the City of Antioch Public Works Department.

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 the California Code of Regulations (CCR), Title 24, Part 6, Section 140.10. Assuming the BESS generates a noise level of 70 A-weighted decibels (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 Article 19, *Noise Attenuation Requirements*, of the Antioch Municipal Code given the anticipated noise generation

4. EXCEPTIONS

and distance to sensitive receptors (Antioch 2024). The proposed project would not lead to an increase in student enrollment and operation of the campus following project completion and operations 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 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 (USFWS) does not identify any wetlands on the project site (USFWS 2026).

Therefore, the proposed project would not result in a significant environmental impact nor 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 3.5 miles northeast of the project site and the nearest eligible state scenic highway to the project site is a segment of SR-4 approximately 3.1 miles southeast of the project site (Caltrans 2026). Due to distance and intervening development, the project site would not be visible from the designated segments of SR-4 or 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 compiling 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,

4. EXCEPTIONS

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 legislator who authored the legislation. Through a search of the following environmental databases, it was determined the project site is not included on the Hazardous Waste and Substances Site List (Cortese), pursuant to Government Code Section 65962.5 (CalEPA 2026a):

- EnviroStor (DTSC 2026)
- GeoTracker (SWRCB 2026)
- Cortese List Solid Waste Facilities (CalEPA 2026b)
- Cortese List Site Cleanup Program (CalEPA 2026c)
- Cortese List hazardous waste facilities subject to Section 25187.5 of the Health and Safety Code (CalEPA 2026d)

As a result, the project site is not identified as a 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 Resources 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.

The City of Antioch is home to a variety of historical resources, ranging from landmark commercial buildings to Victorian, Craftsman, and Modern-style homes, to churches, schools, and civic buildings. Most locally recognized historic buildings are in downtown Antioch, approximately 0.4 miles north of the project site. The project site is not identified by the City as a local historical resource (Antioch 2003b). Additionally, the campus is not listed on the National Register of Historic Places or the California Historical Landmark list (NPS 2026, OHP 2026). The campus buildings proposed to be demolished, the administration and MPR buildings, and portable building 26, 27, 36, and 37, were built in 1952, 1990s, 1900s, 1999, and 2002, respectively. Only

4. EXCEPTIONS

the administration and MPR buildings are over 50 years old, making them old enough to qualify as a historic resource. They were over 50 years old during completion of the General Plan Environmental Impact Report, which evaluated potential impacts to historic resources, and they were not recognized as an historic resource by the City (Antioch 2003a; 2003b). 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.

4. EXCEPTIONS

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