

March 7, 2019

Ms. Lalanya Rothenberger
Executive Director, Facilities and Strategic Planning
Natomas Unified School District
1901 Arena Blvd.
Sacramento CA 95834
Email: lrothenberger@natomasunified.org

Dear Ms. Rothenberger:

Thank you for your March 5, 2019, letter with revised site plan, regarding the Paso Verde School proposed to be constructed on Natomas Unified School District (NUSD) property two miles southeast of Sacramento International Airport. This letter serves as the Airport Land Use Commission's (ALUC) response to that revised site plan.

The revised site plan shows changes that were made to the original site plan which was the basis for the ALUC's first review letter (dated June 28, 2018). As you state, the primary change is that play fields are no longer located in Safety Zone 4 of the Sacramento International Airport Land Use Compatibility Plan (ALUCP). In addition, your letter states that:

"The NUSD will restrict use of areas of the project site that are in Safety Zone 4, consistent with the guidance in the Sacramento International Airport Land Use Compatibility Plan. NUSD will ensure that the site plan and ongoing operation of the school will avoid any school-curriculum-related use within Safety Zone 4, including physical education and recess. In addition, the emergency procedures developed for the Paso Verde School will include evacuation drills that do not involve the use of any areas within Safety Zone 4." (emphasis in original).

This site plan modification significantly alleviates the safety concern described in our February 20, 2019, follow-up letter to NUSD and enables the project to be consistent with the safety criteria established in the ALUCP. The new primary use, the proposed parking lot, is considered an allowed use in Zone 4 so long as it is used exclusively for parking and is not used for any activity that would result in a congregation of students in that area. The following statement in your March 6, 2019, letter confirms your acceptance of this requirement:

"The NUSD will not use Zone 4 areas, including the parking area, for school functions – this will not be an area where students congregate for a mobile library, a school fair, or for other school functions."

In addition, your March 5, 2019, letter describes measures that NUSD promises to take to minimize the effects of aircraft noise at the school site. In the ALUC's June 28, 2018, letter we noted that the entire school site is located within the 60 CNEL noise contour line. Your

current site plan fundamentally leaves the classrooms in the same location as in the site plan we reviewed at that time. The ALUC determination, paraphrased from our June 28, 2018 letter, was that school buildings shall be built in accordance with the standards of the California Division of State Architects (DSA) regarding interior noise levels from exterior noise sources. Specifically, DSA requires that interior noise attributable to exterior sources not exceed an hourly equivalent noise level of 50 dBA in occupied areas during any hour of operation. As stated in the prior letter, the ALUC will accept the sound attenuation construction standards DSA places on the school as satisfying the ALUC's noise requirements.

In your March 5, 2019, letter you state your recent acoustical analysis concludes that the building design will meet or exceed the DSA standards. The ALUC staff believes it is important to recognize, however, that these standards reflect average noise levels. There should not be an expectation that meeting these standards will mean that aircraft noise will be inaudible inside the classrooms. ALUC staff has not seen data regarding anticipated single-event interior noise levels. The NUSD may need to understand that, despite meeting DSA standards, there will still be the possibility that aircraft noise will not only be audible but potentially loud enough to briefly interfere with speech communication.

Finally, your letter states:

"A form of notice shall also be created to be provided by NUSD to notify parents of students that all land within the school site is or may be at a future date exposed to low and frequent airport overflights, aircraft noise, vibrations, fumes, dust, fuel particles, and all other effects that may be caused or may have been caused by the operation of aircraft landing at, taking off from, or operating at or on Sacramento International Airport."

The ALUC strongly supports and recommends this disclosure. The ALUC recommends that the disclosure acknowledge that aircraft noise may be audible inside classrooms and could disrupt teaching activities. In addition to providing language in the student handbook and on the NUSD website, the ALUC recommends that disclosure be proactive. Once again, thank you for working closely with SACOG staff to find a resolution to the issues involved with the school project as it relates to airport land use compatibility. This concludes the ALUC's review. If the NUSD has further questions about the ALUC's review, please feel free to contact SACOG planning staff person Greg Chew at (916) 340-6227 or gchew@sacog.org.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JC', with a long horizontal stroke extending to the right.

James Corless
Executive Director