

# SACRED HEART SCHOOLS PRACTICE GYM PROJECT DRAFT SUBSEQUENT INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

*Prepared for*

Town of Atherton  
91 Ashfield Road  
Atherton, CA 94027



January 2013

*Prepared by*

**URS**

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## Town of Atherton

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### NOTICE OF PUBLIC HEARING and NOTICE OF INTENT TO ADOPT A SUBSEQUENT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION SACRED HEART SCHOOLS PRACTICE GYM PROJECT

**NOTICE IS HEREBY GIVEN** that the Atherton Planning Commission will hold a public hearing to consider adopting a Subsequent Initial Study/Mitigated Negative Declaration and approving an application for a Conditional Use Permit to allow construction of a 12,000 square foot Practice Gym pursuant to Atherton Municipal Code Chapters 17.12 and 17.36.

**Description:** The Practice Gym Project (project) would consist of the demolition of the existing basketball courts and construction of a Practice Gym building, enlargement of a paved area to accommodate emergency vehicles, and expansion of an existing detention basin. The Practice Gym would be located at the southwest corner of the Homer Science building in the area of the existing exterior basketball courts, between the Homer Science building and the Morey practice field. The pavement for the existing basketball courts would be removed and the new one-story Practice Gym would be built in the same general area. The approximately 12,000 square-foot Practice Gym would house two full basketball courts. Provisions for volleyball courts would also be included. No new scheduled games or uses would be proposed as the Practice Gym would merely accommodate activities already occurring on the SHS campus. The Practice Gym would not include any spectator seating. The project is located at 150 Valparaiso Avenue in Atherton (Assessors Parcel Number 070-390-010).

**NOTICE IS HEREBY GIVEN** that a Subsequent Initial Study/Mitigated Negative Declaration has been prepared for the above described project pursuant to the provisions of the California Environmental Quality Act. A copy of this document is available for public review at the Atherton Town Hall, 91 Ashfield Road, Atherton, CA beginning January 18, 2013. The public review period is from January 18, 2013 to February 18, 2013.

**NOTICE IS FURTHER GIVEN** that said application is set for hearing by the Planning Commission at its regular meeting on Wednesday, February 27, 2013 at 6:00 p.m. in the Town Hall of the Town of Atherton, at which time and place all persons interested may appear and show cause, if they have any, why the Conditional Use Permit should not be approved.

**IF YOU CHALLENGE** the Conditional Use Permit and/or Environmental Document in court, you may be limited to raising only those issues you or someone else raised at the Public Hearing described in this notice, or in written correspondence delivered to the Planning Commission at, or prior to, the Public Hearing.

For further particulars, reference is made to the application on file. Any attendee who wishes accommodation for a disability should contact the Building Division at (650) 752-0560 at least 48 hours prior to the meeting.

**Date Posted:** February 17, 2013

**ATHERTON PLANNING COMMISSION**

Neal J. Martin, Town Planner



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### 1.0 INTRODUCTION

#### 1.1. PURPOSE OF THE SUBSEQUENT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

The purpose of this Subsequent Initial Study/Mitigated Negative Declaration (Subsequent IS/MND) is to determine whether changes proposed to the 2009 Sacred Heart Schools Master Plan (2009 Master Plan) would result in the need for a Supplemental or Subsequent Environmental Impact Report.

In April 2010, the Town of Atherton (Town) prepared a program Environmental Impact Report (EIR) for the 2009 Master Plan. The EIR was certified and the 2009 Master Plan was adopted by the Town in July 2010. Since that time, Sacred Heart Schools (SHS) has implemented some, but not all, of the projects in the 2009 Master Plan.

At this time, SHS would like to construct a new Practice Gym in the area of the existing exterior basketball courts between the Homer Science Building and the Morey practice field. The Practice Gym was not included as a free-standing building in the Master Plan, but was included as part of a reconstructed McGanney Gym. Therefore, the Town is preparing this Subsequent IS/MND to analyze the impacts of amending the 2009 Master Plan to include the Practice Gym as a free-standing building. The “proposed project” would consist of the Practice Gym along with an enlarged stormwater detention basin and an emergency vehicle parking pad.

Under the California Environmental Quality Act (CEQA) Guidelines 15168, when a program EIR has been prepared for a project, subsequent activities in the program must be examined in the light of the program EIR. This Subsequent IS/MND specifically considers whether the addition of the proposed project to the 2009 Master Plan would result in new significant impacts not identified in the 2010 EIR or a substantial increase in the severity of the previously identified significant impacts. This IS/MND also discusses any pertinent new information or changes in circumstances that could result in new significant impacts not identified in the 2010 EIR or a substantial increase in the severity of the previously identified significant impacts. Previously imposed mitigation measures from the 2010 EIR are identified and, where appropriate, are clarified, refined, or revised. This Subsequent IS/MND also identifies whether or not new mitigation measures are required.

This Subsequent IS/MND demonstrates that no further/additional CEQA review is required as none of the circumstances necessitating preparation of additional CEQA review as specified in CEQA and the CEQA Guidelines, including Public Resources Code Section 21166 and CEQA Guidelines Sections 15162 and 15163, are present in that:

- (1) there are no substantial changes to the project that would result in new significant environmental impacts or a substantial increase in the severity of significant impacts already identified in the previous CEQA document;

(2) there are no substantial changes in circumstances that would result in new significant environmental impacts or a substantial increase in the severity of significant impacts already identified in the previous CEQA document; and

(3) there is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous CEQA document was adopted, which is expected to result in (a) new significant environmental effects or a substantial increase in the severity of significant environmental effects already identified in the previous CEQA document; or (b) mitigation measures which were previously determined not to be feasible would in fact be feasible, or which are considerably different from those recommended in the previous CEQA document and which would substantially reduce significant effects of the project, but the Town declines to adopt them.

Therefore, in considering approval of amending the 2009 Master Plan to include the Practice Gym, the Town can rely on the previous CEQA document.

### **1.2. BACKGROUND**

The 2009 Master Plan proposed demolition, construction, renovation, and site improvements on the SHS campus to accommodate an additional 114 students on the campus, from the current 1,082 students to a maximum enrollment of approximately 1,196 students. The Master Plan included the relocation of the St. Joseph's (Lower/Middle School) Campus and construction of new instructional, administrative, and library buildings as well as an Assembly Hall and Performing Arts classrooms on the Lower/Middle School Campus, construction of a new parking lot to serve the Lower/Middle School, construction of an expanded McGanney Gym, and overall improvements to the Sacred Heart Schools campus, including campus entry and drop off/pick up improvements, pedestrian and vehicular improvements, sports field realignments and relocation, minor sewer repair, and tree maintenance.

Because SHS would like to amend the 2009 Master Plan to include the proposed project, new approval of certain discretionary actions by the Town and potentially other governmental agencies are required; therefore, the proposed project is subject to the California Environmental Quality Act (CEQA).

### **1.3. LEAD AGENCY**

The lead agency for the proposed project is the Town of Atherton, California, located at 91 Ashfield Road, Atherton, CA 94027. The Town of Atherton as the CEQA Lead Agency has prepared this Subsequent IS/MND to provide agencies and the public with information about the proposed project's potential impacts on the local and regional environment. This document has been prepared in compliance with CEQA as amended and the State CEQA Guidelines, California Administrative Code, Title 14, Division 6, Chapter 3.

### 1.4. SUBSEQUENT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION ORGANIZATION

This Subsequent Initial Study/Mitigated Negative Declaration is organized into the following chapters:

- **Chapter 1 – Introduction:** Discusses the overall document purpose, provides a brief project background, and summarizes the organization of the document.
- **Chapter 2 – Project Description:** Provides background on the proposed project, a description of the project site, and project components and characteristics.
- **Chapter 3 – Environmental Topics:** This chapter provides a description of existing site conditions for the proposed project and an environmental assessment of any changes that amending the 2009 Master Plan to allow the construction and operation of the proposed project would create. For each environmental topic, the chapter summarizes the 2010 EIR analysis and conclusions, summarizes existing conditions on the proposed project site, analyzes the effects of implementation of the proposed project, and compares that with the information contained in the 2010 EIR. Also, previously imposed mitigation measures from the 2010 EIR are identified, and where appropriate, are clarified, refined, revised, or deleted.
- **Chapter 4 – Report Preparation:** Identifies preparers of the document, references used and persons and organizations contacted.

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## 2.0 PROJECT DESCRIPTION

### 2.1. REGIONAL AND LOCAL SETTING

The SHS campus is located in the Town of Atherton in San Mateo County, approximately 30 miles south of San Francisco and 20 miles north of downtown San Jose, on the San Francisco peninsula. The proposed project site is located 2 miles west of U.S. 101 and 2 miles east of Interstate-280 (I-280) and is bounded by Valparaiso Avenue to the south, Emilie Avenue to the east, Park Lane to the north, and Elena Avenue to the west. Local access is currently provided from Valparaiso, Emilie, and Elena Avenues, as well as Park Lane. Regional access is provided from U.S. 101 and I-280. Figure 2-1 illustrates the proposed project site location.

### 2.2. PROJECT SITE

#### 2.2.1. Sacred Heart Schools Campus

The SHS campus is comprised of approximately 64 acres. The SHS campus includes three divisions; the Pre-School/Kindergarten, Lower and Middle Schools, and the Sacred Heart Preparatory, consisting of the High School. The entire campus is developed with school buildings, parking lots, interior roadways, pedestrian and bicycle facilities, a pool, athletic fields, and landscaping. Oakwood, a home for retired nuns, occupies residential buildings located near the middle of the site.

Instructional buildings for the Pre-School/Kindergarten, Lower, and Middle School (grades 11 through 8) are located primarily in the eastern part of the campus. The high school division, Sacred Heart Preparatory, is located in the central part of the campus. Instructional facilities are surrounded by landscaping, H trees, a Performing Arts Center, and various athletic fields. Physical education facilities are located on the campus and include athletic fields, an Olympic-size swimming pool, an all-weather track, a tennis complex, and two gymnasiums.

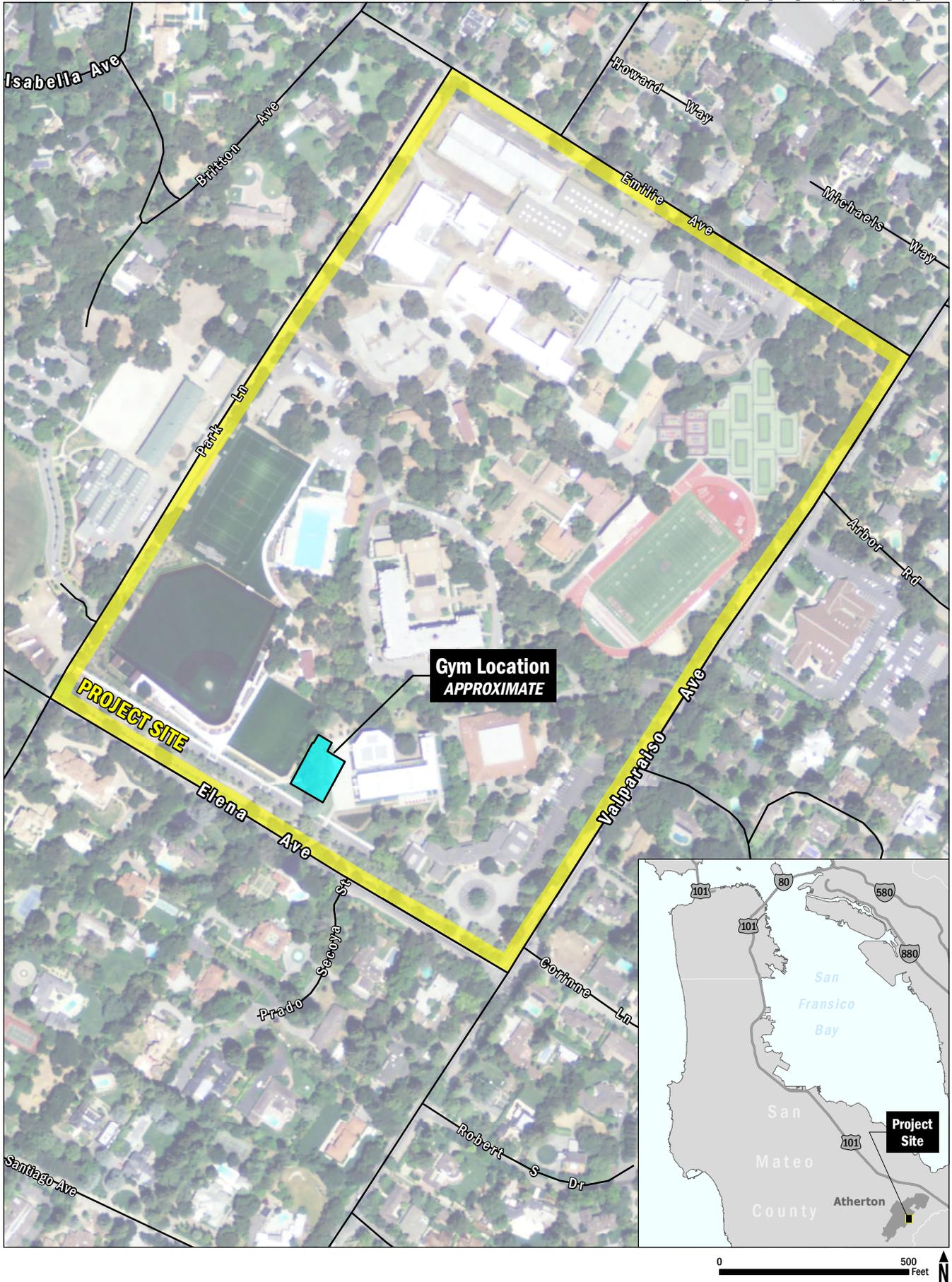
The SHS campus is designated as Public Facilities and Schools in the Town General Plan and zoned as Public Facilities and Schools (PFS).

#### 2.2.2. Sacred Heart Schools Practice Gym

The Practice Gym would be located between the Homer Science building and the Morey practice field and separated from Elena Avenue by a parking lot and street and site landscaping.

#### Surrounding Land Uses

The SHS campus is located in a predominately suburban residential area. The property is bounded by Valparaiso Avenue and the Church of Latter Day Saints to the south, single-family residential properties



**FIGURE 2-1**  
Sacred Heart Schools Practice Gym Project Site Location

to the east and west, and the Menlo Circus Club (a country club and equestrian facility) and single-family residential properties to the north.

### **2.3. PLANNING BACKGROUND**

SHS prepared the 2009 Master Plan as part of an assessment of improvements to their facilities. The 2009 Master Plan is not a Town regulatory land use plan, but is a Master Plan as conceived by SHS to guide construction and maintenance of their campus and educational facilities to meet their educational goals. Private schools in the Town are requested to submit Campus Master Plans to the Town for public informational purposes.<sup>1</sup> Therefore, the 2009 Master Plan is not a part of the Town's General Plan or land use planning policy, but is used by the Town in the review and approval process for SHS Conditional Use Permits. The Atherton Planning Commission annually reviews school master plans and provides the opportunity for the school to add new or revise projects included in master plans. Environmental documentation is not required for the annual review.

The 2009 Master Plan was based on research of the existing condition of SHS facilities and summarized projects accomplished to date. The 2009 Master Plan described the various projects needed to meet the instructional needs of SHS and maintain the campus facilities, including maintaining the health of campus trees, enhancing overall campus safety and security by improving campus entryways, improving pedestrian and vehicular pathways, mitigating traffic flow problems and replacing the lower and middle school buildings, realigning athletic fields, relocating parking, improving storage facilities, and other campus improvements.

In April 2010, the Town prepared a program EIR for the 2009 Master Plan. The EIR was certified and the 2009 Master Plan approved by the Town in July 2010. Since that time, SHS has implemented some, but not all, of the projects in the 2009 Master Plan. The SHS Master Plan map illustrating projects included in the 2009 Master Plan is shown in Figure 2-2.

At this time, SHS would like construct a new Practice Gym in the area of the existing exterior basketball courts between the Homer Science Building and the Morey practice field. The 2009 Master Plan included a Practice Gym within an expanded McGanney Sports Center; however, a stand-alone Practice Gym was not included. SHS is now proposing to amend the 2009 Master Plan to include the Practice Gym and is preparing this Subsequent IS/MND to analyze the impacts of amending the 2009 Master Plan. The purpose of this environmental document is to specifically assess the extent to which changes would occur from inclusion of the proposed project into the 2009 Master Plan and whether new or more severe impacts would occur than those already identified in the 2010 EIR.

A description of the proposed project is provided below.

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<sup>1</sup> *Town of Atherton General Plan, 1.550 Schools, p.LU-6, 2002, and Town of Atherton Municipal Code, 17.36.030, 2009.*



### **2.4. PROJECT CHARACTERISTICS**

#### **2.4.1. Sacred Heart Schools Practice Gym**

The proposed project would consist of the demolition of the existing basketball courts and construction of a Practice Gym building, enlargement of a paved area to accommodate emergency vehicles, and expansion of an existing detention basin. The Practice Gym would be located at the southwest corner of the Homer Science building in the area of the existing exterior basketball courts, between the Homer Science building and the Morey practice field. The pavement for the existing basketball courts would be removed and the new one-story Practice Gym would be built in the same general area. The approximately 12,000 square-foot Practice Gym would house two full basketball courts. Provisions for volleyball courts would also be included. No new scheduled games or uses would be proposed as the Practice Gym would merely accommodate activities already occurring on the SHS campus.

The Practice Gym would not include any spectator seating. The Practice Gym would include a small athletic office, storage and mechanical room, and janitorial space. Due to the proximity of restrooms in the Homer Science building and Concession Building, no restrooms would be provided in the Practice Gym. The Practice Gym would be designed to accommodate other school community functions such as receptions or large meetings already occurring on the campus in other buildings. The Practice Gym would also be used for summer camp activities. A patio/courtyard space designed between the Homer Science building and the Practice Gym would serve as a fire emergency staging area as well as a gathering space for students. The building site plan and Practice Gym floor plan are shown in Figures 2-3 and 2-4, respectively.

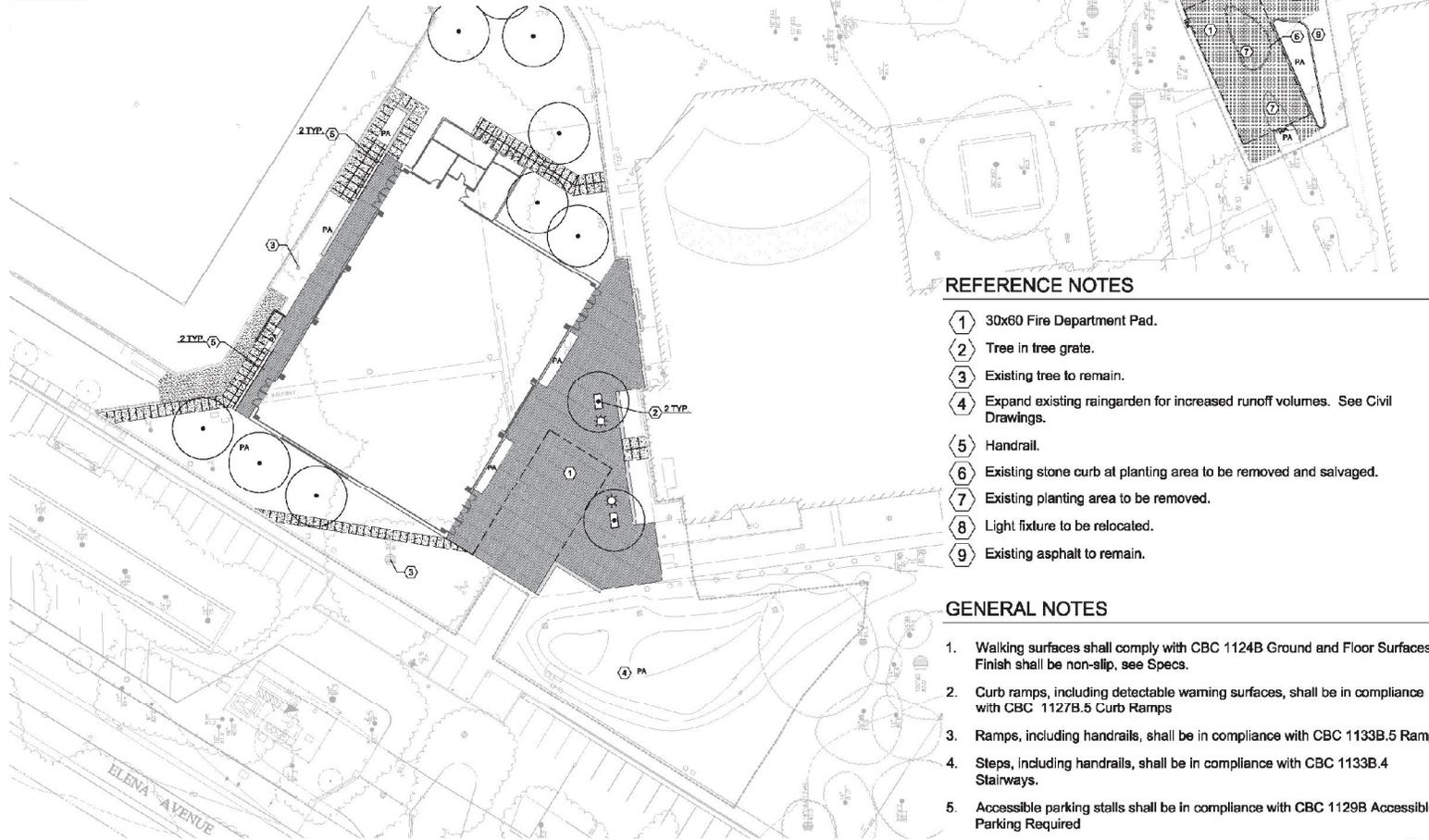
#### **2.4.2. Building Materials and Site Improvements**

The Practice Gym would have a plaster exterior colored to match the Homer Building, with colored-composite panels in rustic earthy tones. The Practice Gym would have glass doors (and adjacent windows) on two sides. Conceptual sketches of the Practice Gym are shown in Figures 2-5 and 2-6.

Lighting would be installed in the area between the Homer Building and the Practice Gym and would be similar to existing lighting installed on the campus. Low lighting would be incorporated to match the Homer building in style, size and color. Lighting on the underside of the entry canopies on the east and west elevations would be incorporated to light the primary entry points. Two vertical poles would be placed in the patio area between the existing Homer building and the Practice Gym. These poles lights would match Homer in type and color and would be approximately 12 feet high. The construction of the Practice Gym would require the removal of 16 non-Heritage trees in the buildable area and 2 non-Heritage trees in the widened fire access lane on the NE side of the Homer building per the requirements of MPFD for a total of 18 trees as noted in Figure 2-7, the Tree Removal Plan. These trees would be replaced with 24 non-Heritage trees such as Olives and London Plane trees. Some of these new trees would be added to the western end of the Practice Gym and others would be located elsewhere on the

**LEGEND**

	Limit of Work Line		Concrete Stepstones.
	Concrete Paving: EJ = Expansion Joint. Other joints are Weakened Plane Joints UON.		Stone Header: To match existing planting edge.
	DG Paving.		Poured in Place Concrete Wall.
	AC Paving.		PA Planting Area: See Planting Plan
	Linear Pavers.		Light: See Electrical Plan
			Headerboard: Continuous at edge of AC paving: See Civil Drawings.



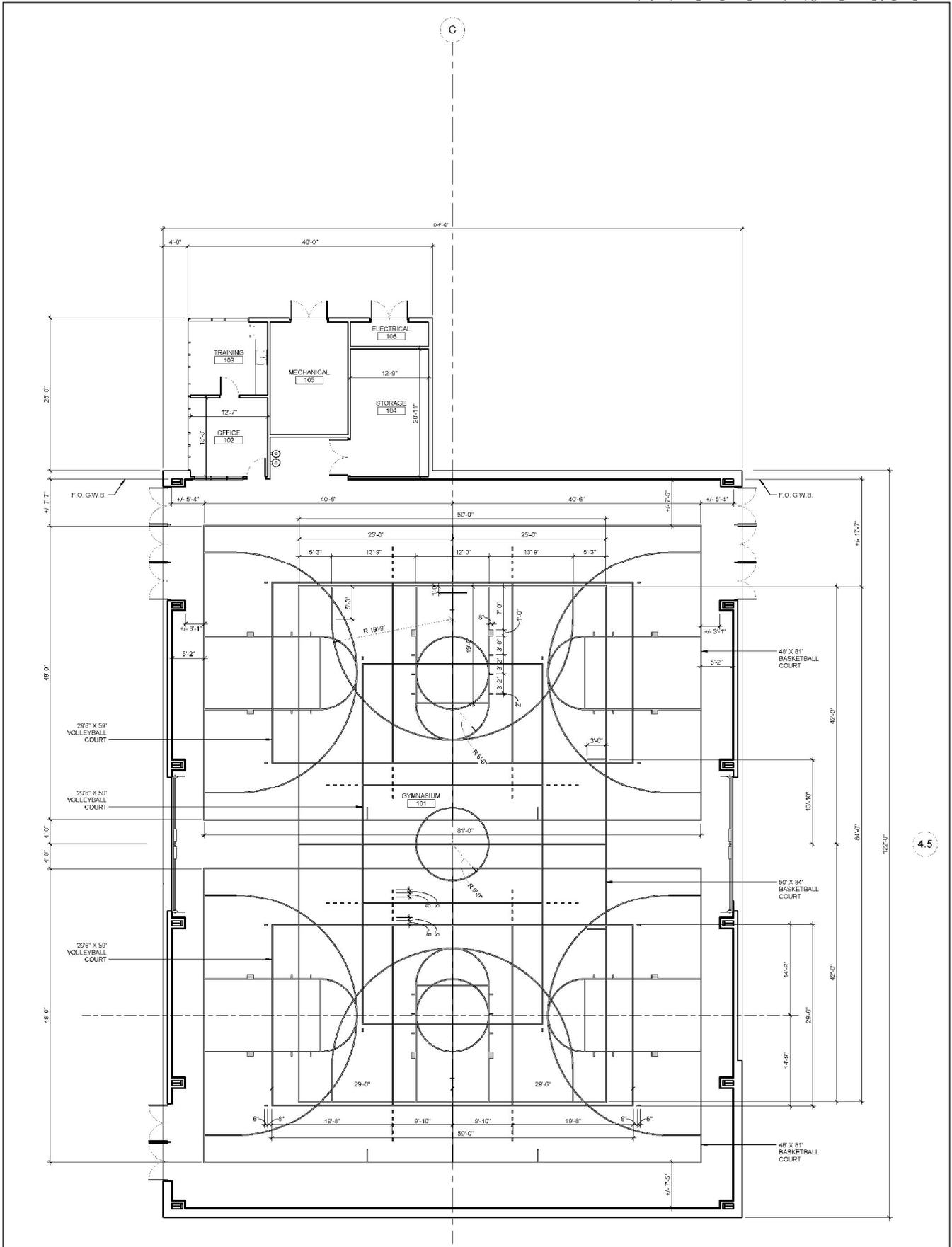
**REFERENCE NOTES**

- ① 30x60 Fire Department Pad.
- ② Tree in tree grate.
- ③ Existing tree to remain.
- ④ Expand existing raingarden for increased runoff volumes. See Civil Drawings.
- ⑤ Handrail.
- ⑥ Existing stone curb at planting area to be removed and salvaged.
- ⑦ Existing planting area to be removed.
- ⑧ Light fixture to be relocated.
- ⑨ Existing asphalt to remain.

**GENERAL NOTES**

- 1. Walking surfaces shall comply with CBC 1124B Ground and Floor Surfaces. Finish shall be non-slip, see Specs.
- 2. Curb ramps, including detectable warning surfaces, shall be in compliance with CBC 1127B.5 Curb Ramps
- 3. Ramps, including handrails, shall be in compliance with CBC 1133B.5 Ramps
- 4. Steps, including handrails, shall be in compliance with CBC 1133B.4 Stairways.
- 5. Accessible parking stalls shall be in compliance with CBC 1129B Accessible Parking Required



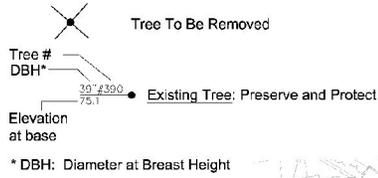


4.5





**PLAN LEGEND**



**TREE REMOVAL NOTES**

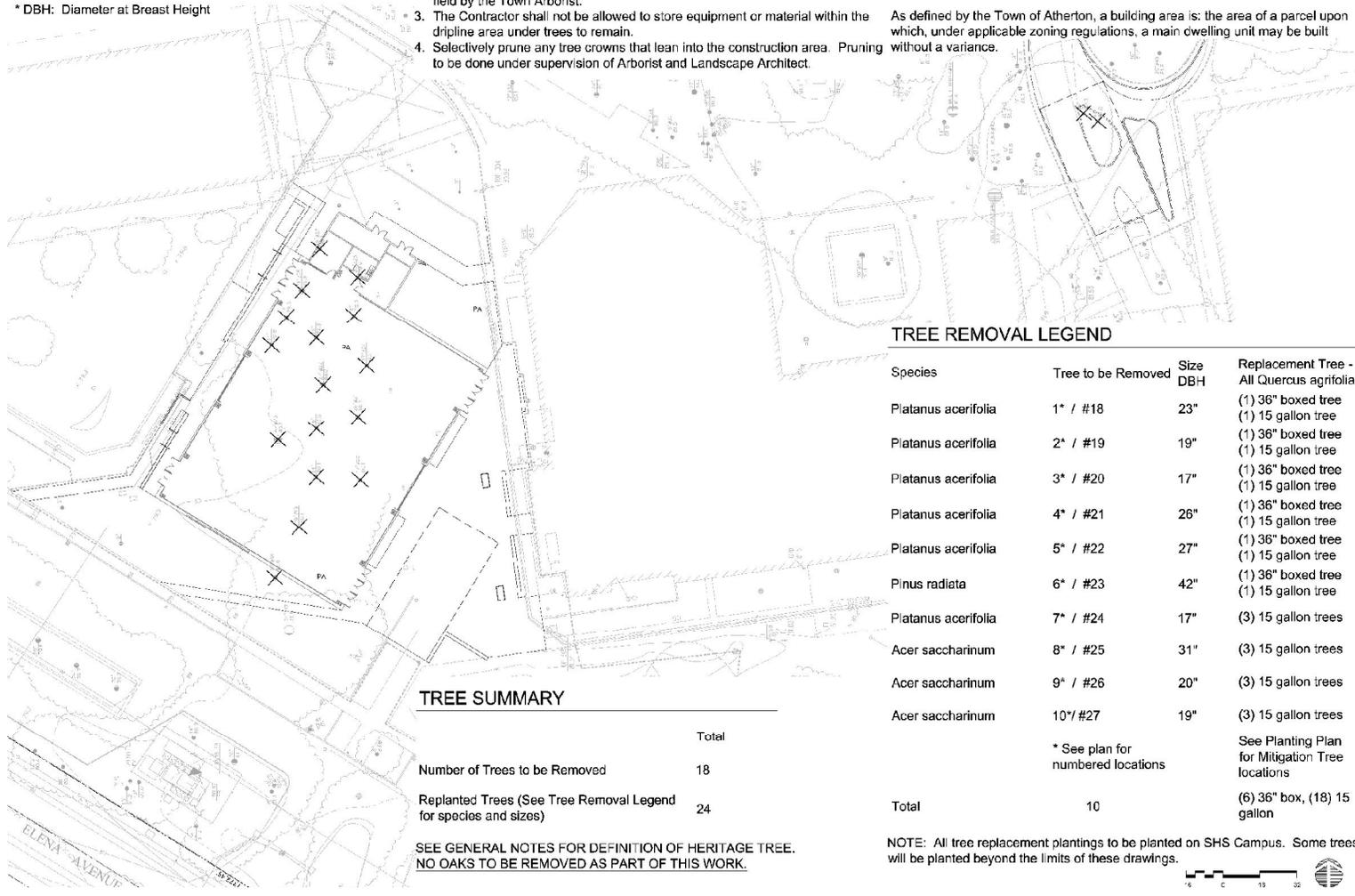
1. All tree removal and protection measures shall be implemented consistent with measures in the specs and Town of Atherton Tree Preservation Guidelines.
2. All trees scheduled for preservation shall be temporarily fenced during construction. Fencing shall be installed prior to starting work. Fencing shall consist of 60" high chain link fence. Fencing shall be rigidly supported and maintained during construction. Fenced areas shall be maintained in a natural condition and not compacted. Removal of fencing shall be allowed following approval by the Town Arborist. Tree fencing locations shall be determined in field by the Town Arborist.
3. The Contractor shall not be allowed to store equipment or material within the dripline area under trees to remain.
4. Selectively prune any tree crowns that lean into the construction area. Pruning to be done under supervision of Arborist and Landscape Architect.

**GENERAL NOTES**

As defined by the Town of Atherton, a Heritage tree is a tree 48 inches or more in circumference (15.1" diameter) measured at 48 inches above natural grade, located outside of the buildable area on the parcel and any native oak greater than 48 inches in circumference located anywhere on the parcel.

A tree may be designated as a Heritage tree by the City Council, based upon findings that the particular tree is unique and of importance to the public due to its unusual age, appearance, location or other factors

As defined by the Town of Atherton, a building area is: the area of a parcel upon which, under applicable zoning regulations, a main dwelling unit may be built without a variance.



**TREE REMOVAL LEGEND**

Species	Tree to be Removed	Size DBH	Replacement Tree - All Quercus agrifolia
Platanus acerifolia	1" / #18	23"	(1) 36" boxed tree (1) 15 gallon tree
Platanus acerifolia	2" / #19	19"	(1) 36" boxed tree (1) 15 gallon tree
Platanus acerifolia	3" / #20	17"	(1) 36" boxed tree (1) 15 gallon tree
Platanus acerifolia	4" / #21	26"	(1) 36" boxed tree (1) 15 gallon tree
Platanus acerifolia	5" / #22	27"	(1) 36" boxed tree (1) 15 gallon tree
Pinus radiata	6" / #23	42"	(1) 36" boxed tree (1) 15 gallon tree
Platanus acerifolia	7" / #24	17"	(3) 15 gallon trees
Acer saccharinum	8" / #25	31"	(3) 15 gallon trees
Acer saccharinum	9" / #26	20"	(3) 15 gallon trees
Acer saccharinum	10" / #27	19"	(3) 15 gallon trees
		* See plan for numbered locations	See Planting Plan for Mitigation Tree locations
<b>Total</b>	<b>10</b>		<b>(6) 36" box, (18) 15 gallon</b>

**TREE SUMMARY**

	Total
Number of Trees to be Removed	18
Replanted Trees (See Tree Removal Legend for species and sizes)	24

SEE GENERAL NOTES FOR DEFINITION OF HERITAGE TREE.  
NO OAKS TO BE REMOVED AS PART OF THIS WORK.

NOTE: All tree replacement plantings to be planted on SHS Campus. Some trees will be planted beyond the limits of these drawings.



Sacred Heart Preparatory side of campus. Turf and decomposed granite would be installed around the building site.

### 2.4.2 Other Project Components

The pathway in front of Homer Science building would be widened to accommodate fire trucks entering from the front of the Main Building, as required by the Menlo Park Fire Protection District (MPFD). In order to accommodate the MPFD truck area, some existing planting in the area would be removed and the existing asphalt pathway widened to provide a truck parking area of 30 feet by 60 feet.

The proposed project would also include the expansion of an existing detention basin. The existing 8,500 cubic foot detention basin, located to the south of Homer Center, would be expanded to 10,960 cubic feet. The detention basin would be planted with native grasses and plants, similar to the existing detention basin planting. The planting plan for the proposed project site is shown in Figure 2-8.

### 2.4.3. Grading and Utility Installation

The proposed project would require site preparation and grading for the Practice Gym. The proposed project would include installation of electrical, gas, and telecommunications. No water supply improvements other than changes to site irrigation are proposed.

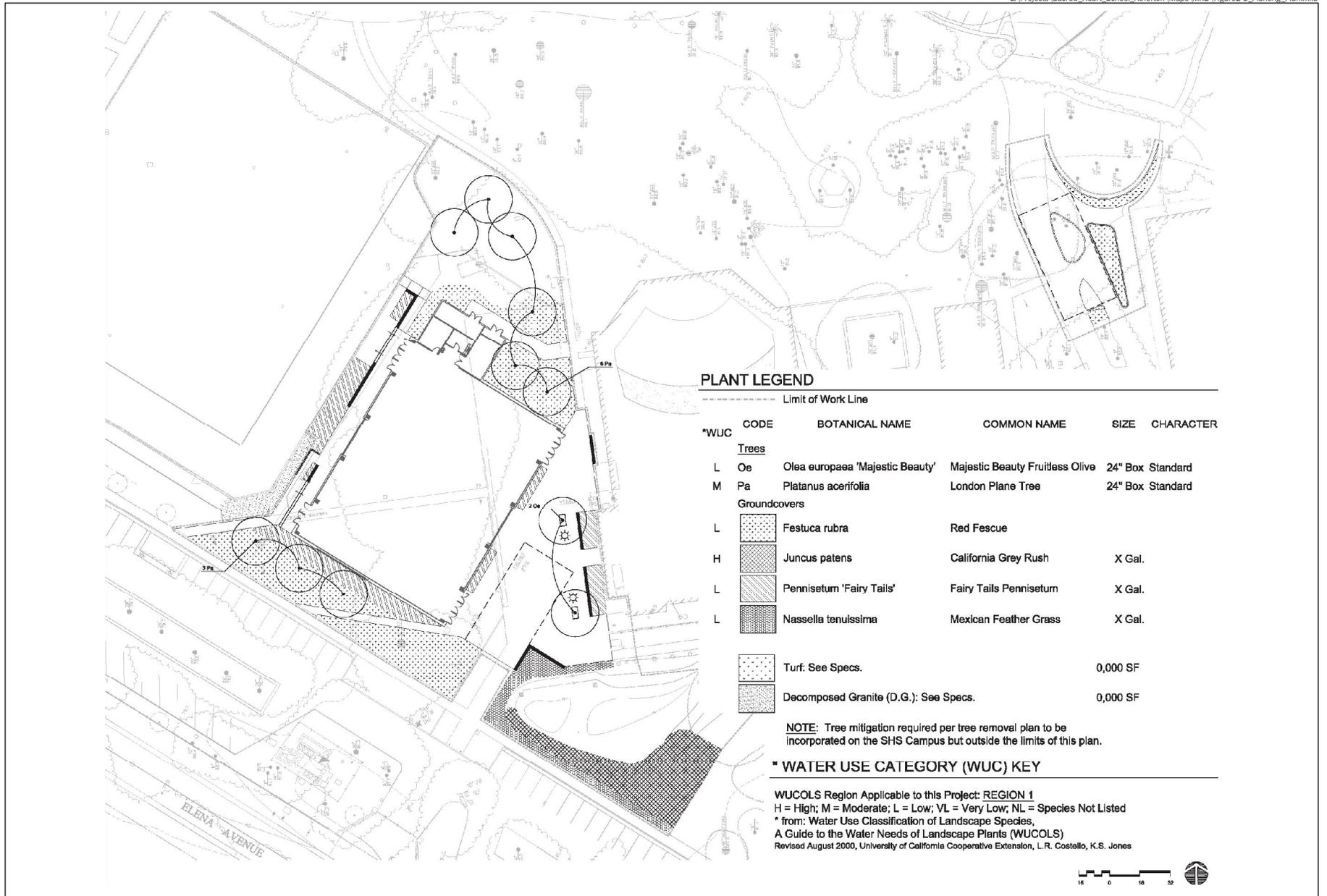
### 2.4.4. Construction

Project construction would occur over approximately 6 to 7 months from May 2013 to December 2013. Staging areas for construction would be located in the Elena Parking Lot. Construction activities would occur Monday through Friday from 8:00 a.m. to 5:00 p.m. All construction truck traffic would be routed along Valparaiso Avenue, then to Elena Avenue and onto campus.

Construction equipment required for the proposed project is shown in Table 2-1.

**Table 2-1  
Potential Construction Activities and Estimated Duration**

<i>Construction Activity</i>	<i>Duration (weeks)</i>
Site Preparation	5
Underground Utility Work and Main Entry Courtyard Revisions	5
General Building Construction	16
Landscaping	3



### **2.5. 2009 SACRED HEART SCHOOLS MASTER PLAN**

The 2009 Master Plan proposed demolition, construction, renovation, and site improvements on the SHS campus to accommodate an additional 114 students on the campus, from the current 1,082 students to a maximum enrollment of approximately 1,196 students. The 2009 Master Plan also included the relocation of the Lower/Middle School Campus and construction of new instructional, administrative, and library buildings as well as an Assembly Hall and Performing Arts classrooms on the Lower/Middle School Campus, a new parking lot to serve the Lower/Middle School campus, and overall improvements to the SHS campus.

These overall campus improvements included entry and drop off/pick up area redesign; pedestrian, bicycle, and vehicular improvements; sports field realignments and relocation; minor sewer repair; and tree maintenance. The 2009 Master Plan did not propose any changes to the number of events or games, use of the school facilities by outside groups, or changes in hours or duration of school times or sessions.

Since adoption of the 2009 Master Plan, SHS has demolished the old Lower/Middle School buildings, the Gatehouse and the tennis courts on the corner of Elena Avenue and Park Lane, and has constructed new elementary and middle school buildings, Library, Assembly Hall, Performing Arts classrooms; relocated sports fields at both the west end of campus and at the new lower/middle school campus; constructed a concession building close to the new west fields; constructed a new Lower/Middle School entry and parking facilities; extended the parking lot along Elena Avenue; and installed associated landscaping and improvements for these projects. The 2009 Master Plan Update discussed potentially relocating the Infant Toddler Center to a location in the center of campus. That plan was eventually deleted and the Infant Center became a part of the new Lower/Middle School building. No demolition or construction has occurred related to replacing the McGanney Sports Center that was to include a Practice Gym area.

The Practice Gym would increase the approved square footage on the SHS campus, as analyzed in the 2009 Master Plan, by 12,000 square feet. No new uses or changes to existing uses on the SHS campus are proposed. Existing and proposed building square footages for the 2009 Master Plan are shown in Table 2-2.

### **2.6. PROJECT OBJECTIVES**

The project objectives are as follows:

- Provide SHS students an all-weather basketball and volleyball Practice Gym.
- Provide SHS summer camp with an additional enclosed activity area.
- Provide SHS an additional enclosed area to host receptions or large meetings already occurring on campus.

- Reduce daily car trips to/from the SHS campus by providing additional practice space for use earlier in the day and eliminating the need for students to return to campus for later practice times.

**Table 2-2  
2010 and Proposed SHS Master Plan Square Footage**

<b>Building</b>	<b>2010 SHS Master Plan (SF)</b>	<b>Proposed SHS Master Plan (SF)</b>
Main	68,008	68,008
Gym - McGanney	40,000	40,000
Practice Gym	—	12,000
Sigall	21,000	21,000
Gate House	3,500	3,500
Maintenance	1,000	1,000
Barn-Grounds Shop	2,400	2,400
Montessori	7,480	7,480
Speiker Pavilion	31,465	31,465
Campbell Center	28,000	28,000
Aquatic Center	2,000	2,000
Field House	7,700	7,700
Science & Student Life	44,100	44,100
Lower School	21,424	21,424
Middle School	30,853	30,853
Library	6,363	6,363
Lower School Assembly Hall/Performing Arts	21,915	21,915
Concession/Restrooms	3,000	3,000
<b>Total</b>	<b>340,208</b>	<b>352,208</b>

**2.7. DISCRETIONARY ACTIONS**

As defined by CEQA, a Lead Agency is the public agency with the principal responsibility for carrying out or approving a project. The Town is the Lead Agency for approval of the proposed project. Conditional Use Permits are required for new construction, relocated buildings, facility changes, and improvements on the SHS campus. Any proposed improvements are required to be consistent with the 2009 Master Plan.

This Subsequent IS/MND analyzes the impacts of amending the 2009 Master Plan to include the proposed project. The purpose of this environmental document is to specifically assess the extent to which changes would occur from inclusion of the proposed project into the 2009 Master Plan and whether new or more severe impacts would occur than those already identified in the 2010 EIR. Upon completion of the environmental review process, the Town will adopt the Subsequent IS/MND as proof that no further environmental review is needed for the proposed project and that none of the circumstances necessitating preparation of additional CEQA review as specified in Public Resources Code 21166 or CEQA Guidelines 15126 and 15163 is required. Once adopted, the Subsequent IS/MND will serve as the environmental document for the proposed project.

A list of the required discretionary permits and approvals that may be required is shown in Table 2-3.

**Table 2-3**  
**Project Approvals**

<b>Agency/Provider</b>	<b>Permit/Approval</b>
Town of Atherton	<ul style="list-style-type: none"><li>• Adopt Subsequent IS/MND</li></ul>
Town of Atherton	<ul style="list-style-type: none"><li>• Approval of Conditional Use Permits</li><li>• Approval of grading and building plans, handicap accessibility, fire, and life safety</li></ul>
Menlo Park Fire Protection District	<ul style="list-style-type: none"><li>• Approval of fire suppression systems</li></ul>
Regional Water Quality Control Board	<ul style="list-style-type: none"><li>• Approval of National Pollutant Discharge Elimination System (NPDES) General Permit</li></ul>
<i>Source: Town of Atherton, 2013.</i>	

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### 3.0 INITIAL STUDY AND DETERMINATION

<b>Project Title:</b>	<b>Sacred Heart Schools Practice Gym</b>
Lead Agency's Name and Address:	Town of Atherton 91 Ashfield Road Atherton, CA 94027
Lead Agency Contact:	Neal Martin, Town Planner (650) 752-0544
Project Location:	Sacred Heart Schools 150 Valparaiso Ave Atherton, CA 94027
Land Use Designation	Public Facilities and Schools
Zoning	Public Facilities and Schools
Description:	Amending the 2009 Sacred Heart Schools Master Plan to include the construction of a new Practice Gym facility, emergency vehicle parking pad, and expansion of an existing detention basin.
Surrounding Land Uses: Single Family Residential Very Low Density and Low Density, Parks and Open Space, Public Facilities and Schools.	

#### 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.

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Aesthetics                        | <input type="checkbox"/> Agricultural and Forestry Resources | <input checked="" type="checkbox"/> Air Quality             |
| <input checked="" type="checkbox"/> Biological Resources   | <input checked="" type="checkbox"/> Cultural Resources       | <input type="checkbox"/> Geology/Soils                      |
| <input type="checkbox"/> Greenhouse Gas Emissions          | <input type="checkbox"/> Hazards & Hazardous Materials       | <input type="checkbox"/> Hydrology/Water Quality            |
| <input type="checkbox"/> Land Use/Planning                 | <input type="checkbox"/> Mineral Resources                   | <input checked="" type="checkbox"/> Noise                   |
| <input type="checkbox"/> Population/Housing                | <input type="checkbox"/> Public Services                     | <input type="checkbox"/> Recreation                         |
| <input checked="" type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities /Service Systems          | <input type="checkbox"/> Mandatory Findings of Significance |

**Determination**

On the basis of this initial evaluation:

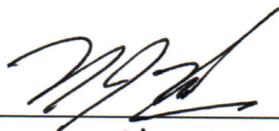
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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 (a) have been analyzed adequately in an earlier Environmental Impact Report (EIR) or NEGATIVE DECLARATION pursuant to applicable standards, and (b) 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.

  
\_\_\_\_\_  
Signature Neal J. Martin, Town Planner Date 1/14/2013

\_\_\_\_\_  
Signature \_\_\_\_\_ Date \_\_\_\_\_

### 4.0 ENVIRONMENTAL CHECKLIST

#### 4.1. AESTHETICS

This section evaluates the potential aesthetic impacts of amending the 2009 Master Plan to include the proposed project.

##### 4.1.1. PRIOR ANALYSIS AND CONCLUSIONS

###### 4.1.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the 2009 Master Plan would have no impact on scenic vistas:

**Impact AES-1: Implementation of the 2009 Master Plan would not have a substantial adverse effect on a scenic vista.**

The Town General Plan does not describe any designated scenic views or scenic resources in the 2009 Master Plan area; therefore, the 2009 Master Plan would not result in any impacts to scenic vistas.

The 2010 EIR concluded that the 2009 Master Plan would have less than significant impacts on scenic resources, visual character, or light and glare:

**Impact AES-2: Implementation of the 2009 Master Plan would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway.**

The SHS Campus is not adjacent to any designated scenic highways. However, the Town General Plan Circulation Policy 2.421 states that, “All streets and highways in the Town of Atherton shall be preserved as scenic routes.” The 2009 Master Plan requires the removal of some trees in select areas, but overall views of the campus would not be significantly changed from Town streets. Therefore, the 2009 Master Plan would not substantially affect the scenic quality of the campus visible from Town streets.

**Impact AES-3: Implementation of the 2009 Master Plan would not substantially degrade the existing visual character or quality of the site and its surroundings.**

Overall, visual changes to the 2009 Master Plan site from relocation of the Lower/Middle School Campus, construction of new buildings and classrooms on the Lower/Middle School Campus, and other improvements to the Sacred Heart Schools campus would not represent a substantial change in the visual quality of the site. The campus has been an existing school campus since 1898. No changes are proposed to the Main Building. The design of buildings and improvements on the site would be consistent with buildings and improvements associated with the existing school uses and would not substantially degrade the existing visual character or quality of the site and its surroundings.

**Impact AES-4: Implementation of the 2009 Master Plan would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.**

The 2009 Master Plan would include additional building, pathway, parking lot, and site lighting. Where feasible, lighting would be similar to current lighting installed on the site. The nearest light-sensitive land uses to the Lower/Middle School campus are residential uses located over 200 feet away across Elena Avenue. These residential uses are not immediately adjacent to the campus; therefore, due to distance and the type of illumination that would be used, light and glare spillover from the campus would not occur at these locations.

**4.1.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were required.

**4.1.2. EXISTING CONDITIONS**

The Practice Gym would be located between the Homer Science Building and Morey Field. The area is currently developed as an existing basketball court, with pavement and basketball hoops. The existing basketball court is not lit at night. An existing detention basin is located adjacent to the Homer Science Building and existing basketball courts. The detention basin includes native plantings and a sculpture. The emergency vehicle access area is currently paved with concrete and includes some landscaping.

**4.1.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following aesthetics criteria.

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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. Substantially degrade the existing visual character or quality of the site and its surroundings?			✓	
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			✓	

**a. Would the project have a substantial adverse effect on a scenic vista?**

As identified in the 2010 EIR, the Master Plan area is not located within any scenic views or scenic resources identified in the Town General Plan.<sup>2</sup> Therefore, the proposed project would not be located within any scenic vista and the proposed project would not result in any new or significant impacts related to scenic vistas beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State or locally designated scenic highway?**

As described in the 2010 EIR, the 2009 Master Plan area would not be visible from designated State Scenic Highway Interstate 280.<sup>3</sup> However, the Town General Plan Circulation Policy 2.421 requires that “All streets and highways in the Town of Atherton shall be preserved as scenic routes.”

The Practice Gym and associated detention basin would be partially visible from Elena Avenue, but would be screened from the roadway by internal campus and roadside trees. The emergency vehicle parking area would not be visible from Town streets surrounding the proposed project site.

The Practice Gym would be constructed of materials that complement the adjacent Homer Science Building and would be consistent with the existing view of the campus from Elena Avenue. Lawn and decomposed granite would be installed around the building site. Eighteen trees would be removed to allow construction of the Practice Gym; however, 24 replacement trees would be planted in the area surrounding the building. As explained in the Project Description, some of these new trees would be added to the western end of the Practice Gym and others would be located elsewhere on the Sacred Heart Preparatory side of campus. Over time, these trees would mature and blend with the existing mature trees on the site.

Additionally, trees located in the parking area and along the SHS campus boundary on Elena Avenue would remain. These trees currently screen views of the project site. The design of buildings and improvements on the site would be consistent with buildings and improvements associated with the existing school uses and would not substantially degrade the existing visual character or quality of the site and its surroundings. Therefore, the proposed project would not result in any new or significant impacts related to scenic resources beyond those described in the 2010 EIR.

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<sup>2</sup> *Town of Atherton, Town of Atherton General Plan, 2002.*

<sup>3</sup> *Caltrans, California Scenic Highway Mapping System: San Mateo County, 2007.*

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2010 Mitigation:** No Mitigation Required

**c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?**

The 2010 EIR discussed changes on the site created by the 2009 Master Plan and concluded that those changes would not substantially degrade the existing visual character or quality of the site. The SHS campus has been an existing school campus since 1898. The design of buildings and improvements on the site would be consistent with buildings and improvements associated with the existing school uses and would not substantially degrade the existing visual character or quality of the site and its surroundings.

As shown in Figures 2-6 and 2-7, the Practice Gym would be constructed of materials that match and complement the adjacent Homer Building. Additionally, the expanded detention basin would be planted with plantings similar in type to the plantings in the existing detention basin. The emergency vehicle parking area would represent a small change in the size of the existing paving and would not be visible from streets surrounding the proposed project site. Although 18 trees would be removed to allow construction of the Practice Gym, up to 24 trees such as Olives and London Plane trees would be planted at the western end of the Practice Gym and elsewhere on the Sacred Heart Preparatory side of campus. Turf and decomposed granite would be installed around the building site. As mentioned previously, trees located in the parking area and along the SHS Campus boundary on Elena Avenue would remain and views of the site would not substantially change. Therefore, the proposed project would not result in any new or significant impacts related to existing visual character or quality beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2010 Mitigation:** No Mitigation Required

**d. Would the project create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?**

The 2010 EIR identified that the lighting that would be incorporated into the design of the Master Plan components, including the Lower/Middle School campus, would be similar to the existing lighting systems in place. No lighting would be proposed for any of the sport fields on the campus.

The exterior of the proposed Practice Gym would consist of plaster colored to match the Homer Building, with colored-composite panels in rustic earthy tones and would not be constructed of any materials that

would induce glare. The Practice Gym would require some change in outdoor lighting to accommodate the new building and pedestrian pathways. New outdoor lighting would include lighting on the underside of the east and west entry canopies of the Practice Gym building, low pedestrian lighting, and two 12-foot vertical poles on the patio between the Homer Building and the Practice Gym. As noted in the Project Description, all new lighting would be incorporated to match the Homer Building in style, size and color. The Practice Gym would include glass doors and adjacent windows on two sides of the building that could potentially emit light from interior lighting. However, the Practice Gym would be separated from any residences across Elena Avenue by trees and landscaping on the campus and on either side of Elena Avenue. Additionally, the closest residences would be over 200 feet away. Therefore, the proposed project would not result in any new or significant impacts related to light and glare beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2010 Mitigation:** No Mitigation Required

## 4.2. AGRICULTURE AND FORESTRY RESOURCES

This section evaluates the potential agriculture and forestry resource impacts of amending the 2009 Master Plan to include the proposed project.

### 4.2.1. PRIOR ANALYSIS AND CONCLUSIONS

#### 4.2.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the 2009 Master Plan would have no impact on agriculture or forestry resources. The 2009 Master Plan area is designated as urban or built-up land and does not contain prime farmland, unique farmland, farmland of statewide importance, timberland or forestland.

#### 4.2.1.2. 2010 EIR Mitigation Measures

No mitigation measures were recommended.

### 4.2.2. EXISTING CONDITIONS

The proposed project would be located on and around an existing open-air basketball court within the SHS Campus. The campus is designated as Public Facilities and Schools in the Town of Atherton General Plan and zoned as Public Facilities and Schools (PFS).<sup>4</sup> No lands on the site are zoned for agricultural use nor is the site subject to a Williamson Act Contract. Additionally, no lands on the site are zoned as forestland (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public

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<sup>4</sup> *Town of Atherton, Town of Atherton Zoning Code and Town of Atherton Zoning Map, 2009.*

Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

**4.2.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following agricultural and forestry criteria.

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✓
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?				✓
c. Conflict with existing zoning for, or cause rezoning of, forestland (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 forestland or conversion of forestland 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 non-agricultural use?				✓

**a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**

As stated in the 2010 EIR, the 2009 Master Plan would not result in any impacts to farmland as the 2009 Master Plan area is designated by the Farmland Mapping and Monitoring Program (FMMP) as urban or built-up land.<sup>5</sup> The Practice Gym would not result in any new or significant impacts related to conversion of agriculture and farmland beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

<sup>5</sup> California Department of Conservation Division of Land Resource Protection, San Mateo County Important Farmland 2010.

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?**

As described in the 2010 EIR, the 2009 Master Plan area is designated as Public Facilities and Schools in the Town of Atherton General Plan and zoned as PFS.<sup>6</sup> The proposed project would be located within the existing campus boundaries and as such is not zoned for agricultural use nor is the site subject to a Williamson Act Contract.<sup>7</sup> Therefore, the proposed project would not result in any new or significant impacts related to conflict with existing zoning or Williamson Act contracts beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project conflict with existing zoning for, or cause rezoning of, forestland (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))?**

The 2010 EIR did not identify impacts to forestland as no lands on the campus are zoned as forestland. The proposed project would be located within the existing campus boundaries and as such is not zoned as forestland (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)).<sup>8</sup> Therefore, the proposed project would not result in any new or significant impacts related to conflict with existing zoning for forestland beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project result in the loss of forestland or conversion of forestland to non-forest use?**

The 2010 EIR did not identify any impacts from conversion to forestland as no lands on the SHS Campus are zoned as forestland. Development of the proposed project would not convert any forestland (as

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<sup>6</sup> *Town of Atherton, Town of Atherton Zoning Code and Town of Atherton Zoning Map, October 21, 2009.*

<sup>7</sup> *California Department of Conservation Division of Land Resource Protection, San Mateo County Williamson Act Lands 2006/2007.*

<sup>8</sup> *Town of Atherton, Town of Atherton Zoning Code and Town of Atherton Zoning Map, October 21, 2009.*

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)) to a non-agricultural use. Therefore, the proposed project would not result in any new or significant impacts related to loss of or conversion of forestland beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?**

As stated above, development of the proposed project would not convert any Prime Farmland, Unique Farmland or Farmland of Statewide Importance or any 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)) to a non-agricultural or non-forest use. Moreover, the site is surrounded by developed land also designated as urban or built-up land. Therefore, development of the proposed project would not result in any impacts to agricultural, forest, or timberland resources as related to conversion of farmland to non-agricultural use.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### **4.3. AIR QUALITY**

This section evaluates the potential air quality impacts of amending the 2009 Master Plan to include the proposed project.

#### **4.3.1. PRIOR ANALYSIS AND CONCLUSIONS**

##### **4.3.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have less than significant air quality impacts on applicable air quality plans, air quality standards, sensitive receptor pollution and odorous emissions:

**Impact AQ-1: Implementation of the 2009 Master Plan would not conflict with or obstruct implementation of the applicable air quality plan.**

The *BAAQMD CEQA Guidelines* recommends that, in jurisdictions where the local general plan is consistent with the Clean Air Plan, and if a proposed project is consistent with the local general

plan, then it is consistent with the CAP. As the General Plan was in place at the time of the most recent CAP and land uses on the project site have not changed, the General Plan is consistent with the Clean Air Plan. Therefore, the 2009 Master Plan does not conflict with the applicable air quality plan.

**Impact AQ-2 (Operation): Operation of the 2009 Master Plan would not violate an air quality standard.**

Operational emissions associated with the development and operation of the 2009 Master Plan would result primarily from increased vehicular trips to and from the development. The 2009 Master Plan would also include source emissions, such as the regular use of natural gas for water and space heaters and landscaping equipment. The net increase in operational emissions with implementation of the 2009 Master Plan would not generate average daily direct and indirect emissions of reactive organic gases (ROGs), nitrogen oxides (NO<sub>x</sub>) or respirable particulate matter (PM<sub>10</sub>) in excess of significance thresholds.

**Impact AQ-3: Implementation of the 2009 Master Plan would not expose sensitive receptors to substantial pollutants.**

Based on computer modeling of project intersections, local carbon monoxide (CO) concentrations do not exceed State or national ambient air quality standards. Although the 2009 Master Plan would generate new traffic trips, the amount of toxic air contaminants (TACs) generated by these new trips would not be of a high enough concentration to pose a cancer risk. Also, the campus is not located within the air resource board (ARB)-recommended radii of a warehouse distribution center, freeway, large gas station, gas dispensing facility or dry cleaning facility.

**Impact AQ-4: Implementation of the 2009 Master Plan would not create objectionable odors.**

The 2009 Master Plan does not include any odor-generating uses and would not create objectionable odors that would affect a substantial number of people.

The 2010 EIR concluded that potentially significant impacts related to construction/demolition emissions would be reduced to less than significant levels:

**Impact AQ-2 (Construction/Demolition): Construction of the 2009 Master Plan would not violate an air quality standard.**

The 2009 Master Plan would involve the demolition of the existing structures and construction of school buildings and a parking area. During the construction phase of development of the project, on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles, and energy use would generate emissions. Fugitive dust would also be generated during grading and construction activities. Sensitive receptors that could be affected by construction included the existing residential areas near the site.

### 4.3.1.2. 2010 EIR Mitigation Measures

For the potentially significant impact related to construction/demolition emissions, the 2010 EIR identified the following mitigation measure to reduce impacts to a less than significant level:

**Mitigation Measure AQ-2.1:** Implementation of the following measures would reduce airborne dust by reducing and controlling loose soils in areas subject to dust creating activity. As a condition of the construction contracts, the Project sponsors shall require that construction contractors follow these construction practices:

- a. Water all active construction areas at least twice daily.
- b. Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard.
- c. Pave, apply water three times daily, or apply non-toxic soil stabilizers on all unpaved access roads, parking areas, and staging areas at the construction sites.
- d. Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at the construction sites.
- e. Sweep public streets adjacent to construction sites daily (with water sweepers) if visible soil material is carried onto the streets.
- f. Hydroseed or apply non-toxic soil stabilizers to inactive construction areas (previously graded areas inactive for ten days or more).
- g. Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- h. Limit traffic speeds on unpaved roads to 15 miles per hour.
- i. Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- j. Replant vegetation in disturbed areas as soon as possible.
- k. Wash off the tires or tracks of all trucks and equipment leaving the construction site.
- l. Install wind breaks at the windward sides of the construction areas
- m. Suspend excavation and grading activities when wind (as instantaneous gusts) exceeds 25 miles per hour.

**4.3.2. EXISTING CONDITIONS**

As stated in the 2010 EIR, the proposed project site is located within the nine-county San Francisco Bay Area Air Basin (Basin). Air quality in the Basin is monitored by the BAAQMD, which operates a regional network of air pollution monitoring stations to determine if the national and State standards for criteria air pollutants are being achieved. The BAAQMD Redwood City Monitoring Station is closest to the proposed project site. This station currently monitors emission levels of O3, CO, NO2, and PM10. The Redwood City monitoring station measurements indicate that the ambient air concentrations in the vicinity of the proposed project site have not exceeded the NAAQS or the CAAQS for CO, O3, and NO2 from 2006-2008 (most recent data available). The State 24-hour standard for PM10 was exceeded twice in 2006 and once in 2007, and the national 24-hour standard for PM2.5 was exceeded once in 2006 and 2007.

The proposed project site currently consists of an outdoor basketball court, detention basin, pedestrian pathway and surrounding landscaping. There are no air pollutant emissions sources associated with the site currently.

**4.3.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following air quality criteria.

<b>Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Conflict with or obstruct implementation of the applicable air quality plan?			✓	
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?		✓		
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			✓	
d. Expose sensitive receptors to substantial pollutant concentrations?			✓	
e. Create objectionable odors affecting a substantial number of people?			✓	

**a. Would the project conflict with or obstruct implementation of the applicable air quality plan?**

As described in the 2010 EIR, the *BAAQMD CEQA Guidelines* recommends that, in jurisdictions where the local general plan is consistent with the Clean Air Plan, and if a proposed project is consistent with the local general plan, then it is consistent with the Clean Air Plan (CAP).<sup>9</sup> The CAP assumed that future growth would occur within the zoning restrictions in effect at the time of its adoption.<sup>10</sup> Since the Town General Plan was in place at the time of the most recent CAP, the General Plan is consistent with the Clean Air Plan. As described in Section 3-11, Land Use and Planning, the proposed project is consistent with the General Plan. Therefore, the proposed project would not result in any new or significant impacts related to an air quality plan beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?**

The 2010 EIR found that the 2009 Master Plan would generate significant emissions during construction. Similar to the 2009 Master Plan, the proposed project would involve the demolition and construction. Construction of the project site would require the use of some on-site stationary sources, heavy-duty construction vehicles, construction worker vehicles, and energy use that would generate emissions. In addition to construction vehicle emissions, fugitive dust would also be generated during grading and construction activities. The resulting dust, which includes PM<sub>10</sub>, is subsequently entrained into the air by wind and vehicle tires. Although much of this airborne dust would settle out on or near the proposed project site, smaller particles would remain in the atmosphere, increasing existing particulate levels within the surrounding area. Sensitive receptors that could be affected by construction include the school children on site and the residences near the project site. Although construction-related emissions would be temporary in duration, in the absence of control measures, the emissions could be substantial. However, upon implementation of Mitigation Measure AQ-2.1 described above, this impact would be less than significant. Therefore, the proposed project would not result in any new or significant impacts related to air quality during construction beyond those described in the 2010 EIR.

Operational emissions associated with the proposed project would include minor stationary area emissions from the use of natural gas for space heating. Most of these stationary emissions have already been accounted for in the 2009 Master Plan, because the Plan accounted for a practice gym as part of the

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<sup>9</sup> *Bay Area Air Quality Management District (BAAQMD), California Environmental Quality Act Air Quality Guidelines, 2010.*

<sup>10</sup> *BAAQMD, Bay Area 2010 Clean Air Plan, 2010.*

McGanney Gym renovation. The proposed project would only result in stationary emissions associated with the net square footage increase of 12,000 square feet, an increase of less than 4 percent.

Project operation would not increase on-road mobile emissions; in fact, the project would likely decrease vehicle trips since all practice games could be held immediately after the end of classes, eliminating the need for students leaving campus and returning later in the evening. Since there would be no mobile emissions and a minimal net increase in stationary emissions associated with the proposed project, operational emissions would not generate average daily direct and indirect emissions of ROG, NO<sub>x</sub>, and PM<sub>10</sub> in excess of significance thresholds. Therefore, the proposed project would not result in any new or significant impacts related to air quality during operation beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** Less Than Significant With Mitigation

**2010 Mitigation:** 2010 EIR Mitigation Measure AQ-2.1

**2012 Mitigation:** 2010 EIR Mitigation Measure AQ-2.1

**Significance After Implementation:** Less Than Significant (No New Impact)

**c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

The 2010 EIR found that the 2009 Master Plan would not result in an increase in CO. The proposed project does not include land uses that would increase CO beyond what was described in the 2010 EIR. Additionally, the project would not generate new traffic trips. Therefore, the proposed project would not result in significant impacts related to criteria pollutants beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project expose sensitive receptors to substantial pollutant concentrations?**

The 2010 EIR states that the 2009 Master Plan would not expose sensitive receptors to substantial pollutant concentrations. TACs are typically associated with a variety of sources, including industrial facilities, commercial facilities such as dry cleaners and gasoline stations, and motor vehicles. TAC emissions from motor vehicles are generally a result of diesel exhaust emissions associated with truck or bus operations and along heavily-traveled freeways. The proposed project would not include any of these land uses, and would not increase vehicle trips generated. Additionally, the proposed project, as a sensitive receptor itself due to its location on a school campus, would not be located within 1,000 feet of a

warehouse distribution center, 500 feet of a freeway, 300 feet of a large gas station, 50 feet of a typical gas dispensing facility or 300 feet of a dry cleaning facility that uses perchloroethylene.<sup>11</sup> Therefore, the proposed project would not result in any new or significant impacts related to exposure of sensitive receptors to TAC emissions beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. Would the project create objectionable odors affecting a substantial number of people?**

As described in the 2010 EIR, the 2009 Master Plan would not create objectionable odors. According to the *BAAQMD CEQA Guidelines*, the types of projects that commonly result in odor impacts include: wastewater treatment plant, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing, fiberglass manufacturing, auto body shops, rendering plants, and coffee roasters.<sup>12</sup> The proposed project would not include any of these uses and would not create objectionable odors that would affect a substantial number of people. Therefore, the proposed project would not result in any new or significant impacts related to objectionable odors beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

#### **4.4. BIOLOGICAL RESOURCES**

This section evaluates the potential biological resource impacts of amending the 2009 Master Plan to include the proposed project.

##### **4.4.1. PRIOR ANALYSIS AND CONCLUSIONS**

###### **4.4.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have no impacts on special status plants, riparian habitats, wetlands, wildlife corridors, or conservation plans:

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<sup>11</sup> California Environmental Protection Agency (CalEPA) and California Air Resources Board (CARB), *Air Quality and Land Use Handbook: A Community Health Perspective*, 2005.

<sup>12</sup> Bay Area Air Quality Management District (BAAQMD), *California Environmental Quality Act Air Quality Guidelines*, 2010.

**Impact BIO-1: Implementation of the 2009 Master Plan would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species.**

It is unlikely that the campus supports any California Natural Diversity Database (CNDDDB) special status species due to the level of development and landscaping on the site. The campus does not contain specified soils, moisture regime or other significant habitat features necessary to support growth of the special status plant species listed with the potential to occur in the region.

**Impact BIO-2: Implementation of the 2009 Master Plan would not have a substantial adverse effect on any riparian habitat or other sensitive natural community.**

There are no Sensitive Natural Communities existing on the campus with the exception of individual Valley oaks (*Quercus lobata*) scattered throughout the campus.<sup>13</sup> Impacts to Valley oak would be addressed under Impact BIO-5 and Mitigation Measure BIO-5.

**Impact BIO-3: Implementation of the 2009 Master Plan would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act.**

There are no wetlands or waters on or in the immediate vicinity of the campus.

**Impact BIO-4: Implementation of the 2009 Master Plan would not 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 site.**

The campus is not located within a known movement corridor for wildlife species and does not support habitat considered to be suitable for a native wildlife nursery site.

**Impact BIO-6: Implementation of the 2009 Master Plan would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan.**

The campus and its vicinity are not located within an area covered by a Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or State habitat conservation plan.

The 2010 EIR concluded that potentially significant impacts related to migratory nesting birds and Heritage trees could be reduced to less than significant levels:

**Impact BIO-1: Implementation of the 2009 Master Plan would not have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species.**

Although special status wildlife species have been identified by the CNDDDB to occur in the vicinity, it is unlikely that the campus supports any of these special status plant species due to the level of site development and landscaping on the site. The campus lacks essential habitat

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<sup>13</sup> Sacred Heart Schools Tree Reports, McClenahan Consulting, LLC, August 2008 and November 2009.

elements required by the individual species for survival and/or breeding (e.g., aquatic habitat, marshes and meadows, specific natural vegetation communities for foraging, etc.). However, there is a potential for new nests to be established prior to or during construction.

**Impact BIO-5: Implementation of the 2009 Master Plan would not conflict with any local policies or ordinances protecting biological resources.**

The development would involve removal of and/or encroachment on Heritage trees on site that are protected under the Town of Atherton Heritage Tree Ordinance (Chapter 8.10). Heritage trees on campus include Valley oaks, which are components of Valley Oak Woodland, a protected Sensitive Community. The removal of and or encroachment on 21 Heritage trees and 101 ornamentals site wide would constitute a potentially significant impact.

#### **4.4.1.2. 2010 EIR Mitigation Measures**

For the potentially significant impact related to migration of nesting birds, the 2010 EIR identified the following mitigation measure to reduce impacts to a less than significant level:

**Mitigation Measure BIO-1:** In order to reduce impacts to nesting birds, the following mitigation measures shall be implemented:

Any active raptor or other nests in the vicinity of proposed grading shall be avoided until young birds are able to leave the nest (i.e., fledged) and forage on their own. Avoidance may be accomplished either by scheduling grading and tree removal during the non-nesting period (September through February), or if this is not feasible, by conducting a pre-construction survey for raptor nests. Provisions of the pre-construction survey and nest avoidance, if necessary, shall include the following:

- a) If grading is scheduled during the active nesting period (March through August), a qualified wildlife biologist shall conduct a pre-construction nesting survey no more than 14 days prior to initiation of grading to provide confirmation on presence or absence of active nests in the vicinity.
- b) If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with California Department of Fish and Game (CDFG) and implemented to prevent nest abandonment. At a minimum, grading in the vicinity of the nest shall be deferred until the young birds have fledged. A nest-setback zone of at least 300 feet shall be established for raptors and 100 feet for other birds within which all construction-related disturbances shall be prohibited. The perimeter of the nest-setback zone shall be fenced or adequately demarcated (e.g. high visibility fencing, staking or flagging), and construction personnel restricted from the area.
- c) If permanent avoidance of the nest is not feasible, impacts shall be minimized by prohibiting disturbance within the nest-setback zone until a qualified biologist verifies that the birds have

either a) not begun egg-laying and incubation, or b) that the juveniles from the nest are foraging independently and capable of independent survival at an earlier date. A survey report by the qualified biologist verifying that the young have fledged shall be submitted to the Town of Atherton and CDFG prior to initiation of grading in the nest-setback zone.

For the potentially significant impact related to Heritage trees, the 2010 EIR identified the following mitigation measure to reduce impacts to a less than significant level:

**Mitigation Measure BIO-5:** In order to reduce impacts to Heritage trees, the following guidelines must be implemented: Town of Atherton Tree Preservation Guidelines, Standards and Specifications (The Guide) as well as information provided in the Tree Reports and Tree Protection and Preservation Plans prepared for the 2009 Master Plan area.

### *Avoidance and Minimization of Impacts*

- The Project arborist shall follow or accompany the survey crews no less than three days prior to the commencement of grading in order to confirm impacts to trees scheduled to be removed and to confirm avoidance of trees schedule for preservation. Should any adjustments to the total impact figures be necessary, the Project arborist shall immediately notify the Project proponent and the Project developer, which shall notify the Town of the revision.
- The Project arborist shall identify and clearly mark the tree's Tree Protection Zone (TPZ) in the field.
- The Project arborist shall ensure that protective fencing is installed around the perimeter of the tree's TPZ. The fence shall be a chain link fence with 6 foot high, minimum 12 gauge chain link fence. Fences are to be mounted on a 2-inch diameter galvanized iron posts, driven into the ground to a depth of at least 2-feet at no more than 10-foot spacing (See detail in Appendix III of The Guide). The Project arborist shall identify all trees requiring temporary fencing and shall verify that the fences are in place prior to commencement of grading operations within 20 feet of the dripline of any tree not scheduled for removal in the permit issued by the Town.
- Tree fencing shall remain in place until the Town Arborist approves the removal.
- A warning sign shall be prominently displayed on each fence (See Appendix IV of The Guide). Signs are available at the Building Department.
- Construction contract specifications shall require that no stockpiled soils, building material, parked equipment or vehicles shall be stored within the fenced TPZ areas.
- Construction contract specifications shall include provision for temporary irrigation/watering and feeding of these trees, as recommended by a qualified arborist.

## Environmental Checklist

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- The Project's arborist shall ensure the placement of four-inches of wood-chip mulch over the ground surface within the TPZ, leaving the trunk clear of mulch.
- When areas within the TPZ cannot be fenced, a Root Buffer is required and shall cover the rootzone.
- Should any protected tree's branches overlap the outer edge of the Project Grading Area and require pruning in order to allow grading to proceed, the pruning shall be performed or supervised by the Project arborist or certified arborist.
- If trenching or pipe installation has been approved within the TPZ, then the trench shall be either cut by hand, air spade, or by mechanically boring the tunnel under the roots with a horizontal directional drill and hydraulic or pneumatic air excavation technology. In all cases, install the utility pipe, immediately backfill with soil and soak within the same day.
- Any damage or injury to trees shall be reported within 6 hours to the Project Arborist and Town Arborist so that mitigation can take place. All mechanical or chemical injury to branches, trunk or to roots over 20inches in diameter shall be reported in the Monthly Inspection Report (refer to Section 2.05 of The Guide).
- A mitigation program is required if the approved development will cause drought stress, dust accumulation or soil compaction to trees that are to be saved. Injury Mitigation guidelines shall be strictly adhered to in order to reduce impacts (refer to Section 2.04 of The Guide).
- No other onsite trees to be preserved shall be encroached upon within their TPZ other than what is being described in the Tree Protection and Removal Plan unless approved by the Town Arborist.
- No landscape, irrigation lines, utility lines and/or grade changes shall be designed and/or installed within the TPZ of any trees to be preserved, unless approved by the Town Arborist.
- Weed Control – the use of soil sterilizers shall be prohibited under and around any trees to be preserved. Sterilizers may leach into the root system and kill the tree. Use of pre-emergent weed killers shall be prohibited within 100 feet of any individual trees to be preserved.
- All work to this project's Heritage trees shall be in accordance with the Town of Atherton's Heritage Tree Ordinance and specific treatment for Heritage Trees set forth in The Guide.
- Examination of the trees to be preserved shall be performed monthly by a qualified arborist to insure that they are being adequately protected and maintained. Prior to the completion of the proposed Project, a qualified arborist shall certify that all concerned tree policies have been adhered to.

- Copies of the proposed project's Tree Report and the Town of Atherton Tree Preservation Guidelines Standards and Specifications shall be maintained onsite during all project construction.

### *Mitigation Planting Program*

In addition to the above listed mitigations, project landscape architects have developed a Mitigation Planting Program to mitigate the loss of site trees due to implementation of the Project as follows:

The Lower/Middle School portion of the Project is proposing 47 replacement trees for impacts to 21 Heritage trees. All Heritage oaks shall be replaced with 48" boxed coast live oak (*Quercus agrifolia*) at a 1:1 replacement ratio. All other species of Heritage trees shall be replaced with 15 gallon *Q. agrifolia* at a 3:1 replacement ratio in accordance with the Town of Atherton Heritage Tree Ordinance (Chapter 8.10). For the 41 additional ornamental trees that shall be impacted, 101 replacement plantings are planned (see Planting plans for sizes, species and locations).

The West Fields portion of the Project is proposing no impacts to Heritage trees. For the 58 ornamental trees that will be impacted, 17 24" box California sycamore (*Platanus racemosa*) and 2 valley oak (*Quercus lobata*) replacement plantings are planned. In addition, 5 mature fruiting olive (*Olea europaea*) would be relocated (see Planting plans for sized, species and locations).

As discussed above, prior to mitigation, the proposed impact to as many as 21 Heritage trees and 101 ornamentals site wide would constitute a potentially significant impact.

Over the long-term (i.e., 10 years), the implementation of the conceptual Mitigation Planting Program would be sufficient to mitigate the proposed Project impacts on Heritage trees and other site trees. Over a period of 10 years, the growth of the replacement oaks and sycamores would be sufficient to provide seed production and nesting opportunities in the replacement tree stock to compensate fully for the loss of the mature trees proposed for removal.

However, over the short-term, it is anticipated that, even with the implementation of the conceptual Mitigation Planting Program, the impact to Heritage trees would remain significant due to the loss of canopy coverage, seed production and nesting opportunities. As discussed in the preceding paragraph, this near-term significant impact should be mitigated to a less than significant level within 10 years following the completion of the conceptual Mitigation Planting Program.

### **4.4.2. EXISTING CONDITIONS**

According to the biological analysis conducted in preparation of the 2010 EIR, vegetation communities and wildlife habitats on campus are composed of an entirely landscaped campus with several native and non-native tree species. There are no sensitive vegetation communities, and no habitat to support special

status plant and/or animal species on or around the campus. Due to the maintained landscape characteristics of the site, no habitat map was created as part of the 2010 EIR analysis.

The proposed project would be located within the existing campus boundaries on a developed site that currently consists of a paved basketball court, paved pedestrian walkway, detention basin, and surrounding vegetation including turf, trees, and shrubs.

An Arborist Report was prepared by SHS for the proposed project area.<sup>14</sup> Tree species in the Practice Gym vicinity include an Aleppo pine, Eucalyptus, Blue atlas cedar, Monterey Pine, 6 London plane trees, 3 Silver maples, 2 Coast live oaks, and a Valley oak.

**4.4.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following biological resources criteria.

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
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, or regulations, or by the California Department of Fish and Game or U.S. 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 Game or U.S. Fish and Wildlife Service (USFWS)?				✓
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✓

<sup>14</sup> SHS Basketball Court Project Arborists Report, McClenahan Consulting, February 9, 2012.

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Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?				✓

**a. Would the project 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, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

As identified in the 2010 EIR, 15 special status plants and 21 special status animals have been identified by the CNDDDB to occur in the vicinity of the campus.<sup>15</sup> However, the proposed project site, like the rest of the campus, does not support any of these special status plant or animal species due to the level of existing site development. Therefore, the proposed project would not directly affect any known occurrences of special-status plant or animal species on or in the immediate vicinity of the site.

According to Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except English sparrows (*Passer domesticus*) and European starlings (*Sturnus vulgaris*). Disturbance that causes nest abandonment and/or loss of reproductive effort is considered “take” by the CDFG.<sup>16</sup> While no nests of raptors or other birds were observed on the site during the reconnaissance survey conducted for the 2010 EIR, there is a potential that new nests have been established since that reconnaissance survey. Tree removal, vegetation clearing, or disturbance in the immediate vicinity of a nest in active use could result in abandonment of the nest or loss of eggs and young, which would be a violation of the Migratory Bird Treaty Act.

Preconstruction surveys would be necessary in advance of construction during the nesting season (March through August) to confirm presence or absence of any new nests. Implementation of the 2010 EIR Mitigation Measure BIO-1 would reduce impacts to less than significant. Therefore, the proposed project

<sup>15</sup> California Natural Diversity Database (CNDDDB).

<sup>16</sup> California State Legislature. Fish & Game Code § 3500-3516.

would not result in any new or significant impacts related to plant and animal species beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** Less Than Significant With Mitigation

**2010 Mitigation:** 2010 EIR Mitigation Measure BIO-1

**2012 Mitigation:** 2010 EIR Mitigation Measure BIO-1

**Significance After Implementation:** Less Than Significant (No New Impact)

**b. Would the project 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 Game or U.S. Fish and Wildlife Service (USFWS)?**

Proposed grading and development would not result in impacts to Riparian Habitat or Other Sensitive Natural Community types. As described in the 2010 EIR, three Sensitive Natural Communities have been documented by CNDDDB and the California Native Plant Society (CNPS) to occur in the vicinity of the proposed project site: Northern Coastal Salt Marsh, Serpentine Bunchgrass, and Valley Oak Woodland.

Northern Coastal Salt Marsh and Serpentine Bunchgrass communities are not present on the proposed project site due to the lack of suitable hydrology, topography, and soils occurring on and in the immediate vicinity of the site (e.g., bay, lagoon, estuary, serpentine soils on hillsides, deep alluvial soils). Individual Valley Oak trees are present on the campus and near the proposed project site, but would not be significantly impacted by the project. Therefore, the proposed project would not result in any new or significant impacts related to sensitive habitats beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

As noted in the 2010 EIR, no federally protected wetlands, as defined by Section 404 of the Clean Water Act (CWA), are present on the Sacred Heart Schools campus, where the proposed project would be located.<sup>17</sup> Furthermore, during site reconnaissance for the 2010 EIR, no areas were observed that would meet the definition of a wetland according to the criteria of the U.S. Army Corps of Engineers. Therefore, the proposed project would not result in any new or significant impacts related to jurisdictional wetlands and waters beyond those described in the 2010 EIR.

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<sup>17</sup> U.S. Congress. 1972. Clean Water Act (CWA).

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project 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?**

As noted in the 2010 EIR, the SHS campus, which includes the proposed project site, is not located within a known movement corridor for wildlife species and does not support habitat considered to be suitable for a native wildlife nursery site. Therefore, the proposed project would not result in any new or significant impacts related to wildlife movement beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

As identified in the 2010 EIR, the Town of Atherton Tree Preservation Guidelines, Standards and Specifications (The Guide) was prepared in 2004 by the Town of Atherton as a guide to the Town's policies and procedures involving trees. The Town of Atherton adopted these policies that provide specific steps to insure the preservation of trees before, during and after construction on a project site. The Guide also includes criteria for Town review of applications involving trees and shrubs and procedures for tree alteration, removal, or planting in the Town of Atherton.

Chapter 8.10.020 of the Atherton Municipal Code defines Heritage trees as either: 1) A tree, located in the tree preservation area, or a native oak tree (*Quercus lobata*, *Quercus agrifolia* or *Quercus douglasii*) located anywhere on a lot, which has a trunk circumference of forty-eight inches or more (15.2 inches in diameter), when measured forty-eight inches above the natural grade; and 2) A tree so designated by the city council, based upon findings that the particular tree is unique and of importance to the public due to its unusual age, appearance, location or other factors. The tree preservation area is defined as the area outside the building area of the lot outside of any required building setbacks.

The construction of the Practice Gym would require the removal of 18 trees, including trees greater than 15.2" in diameter and trees less than 15.2" in diameter.<sup>18</sup> The trees to be removed would not qualify as Heritage trees based either on their species, size, or location in the buildable area (and outside of the tree

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<sup>18</sup> SHS Basketball Court Project Arborists Report, McClenahan Consulting, February 9, 2012.

preservation area) and thus would not be protected under the Town of Atherton Heritage Tree Ordinance (Chapter 8.10).<sup>19</sup> Two Coast live oaks and one Valley oak on site qualify as Heritage trees; however, none of these trees would be affected by the proposed project.

Although no Heritage trees would be removed by construction of the proposed project and no mitigation is required, SHS would still replace removed trees with 24 trees such as Olives and London Plane trees. Therefore, the proposed project would not result in a substantial increase in impacts related to local policies protecting biological resources beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** No Impact

**2010 Mitigation:** 2010 EIR Mitigation Measure BIO-5

**2012 Mitigation:** No mitigation required

**Significance After Implementation:** Less Than Significant (No New Impact)

**f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?**

As described in the 2010 EIR, the proposed project site and its vicinity are not located within an area covered by a Habitat Conservation Plan, Natural Community Plan, or other approved local, regional, or State habitat conservation plan. Therefore, development of the proposed project would not result in any impacts related to conflicts with a habitat conservation plan.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

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<sup>19</sup> *Town of Atherton, Town of Atherton Zoning Code Chapter 8.10: Removal of and Damage to Heritage Trees, 2009.*

### 4.5. CULTURAL RESOURCES

This section evaluates the potential cultural resource impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.5.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.5.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the 2009 Master Plan would have no impact on historic or paleontological resources:

Construction of the Lower/Middle School component of the Master Plan would require demolition of the Lower and Middle School buildings and Foley Center. However, these buildings are not historic structures and the Master Plan would not result in a substantial adverse change in the significance of a historical resource as defined in § 15064.5. Although the Main Building is eligible for listing as a historic structure, no changes are proposed for the Main Building.<sup>20</sup>

There are no known paleontological resources or unique geologic features on the campus. The campus has been developed with and is presently developed with school land uses.

The 2010 EIR concluded that the 2009 Master Plan would have a less than significant impact on archaeological resources and human remains:

There are no known archaeological resources on the campus. The campus has been developed with and is presently developed with school land uses. All known human remains on campus are buried within the confines of a small private cemetery. However, as with any project that requires earthmoving or grading activities, there is the possibility that buried archaeological deposits or human remains could be present and accidental discovery could occur during 2009 Master Plan construction activities.

##### 4.5.1.2. 2010 EIR Mitigation Measures

For the potentially significant impact related to the discovery of cultural resources during project implementation, the 2010 EIR identified the following mitigation measure to reduce impacts to a less than significant level:

**Mitigation Measure CR-1:** In the event that additional subsurface archaeological resources are encountered during the course of grading and/or excavation, all development shall temporarily cease in these areas until the Town's Planning Department is contacted and agrees upon a

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<sup>20</sup> Page & Turnbull, *Regarding the Historic Status of the Sacred Heart Main Building, Memorandum, September 9, 2008.*

qualified archaeologist to be brought onto the Project site to properly assess the resources and make recommendations for their disposition. Prehistoric archaeological site indicators include: obsidian and chert flakes and chipped stone tools; grinding and mashing implements (e.g., slabs and handstones, and mortars and pestles); bedrock outcrops and boulders with mortar cups; and locally darkened midden soils. Midden soils may contain a combination of any of the previously listed items with the possible addition of bone and shell remains, and fire affected stones. Historic period site indicators generally include: fragments of glass, ceramic, and metal objects; milled and split lumber; and structure and feature remains such as building foundations and discrete trash deposits (e.g., wells, privy pits, dumps). Construction activities could continue in other areas. If any findings are determined to be significant by the archeologist, they shall be subject to scientific analysis; duration/disposition of archaeological specimens as agreed to by the Native American community, land owner, and the Town; and a report prepared according to current professional standards.

**Mitigation Measure CR-2:** If human remains are encountered, excavation or disturbance of the location shall be halted in the vicinity of the find, and the county coroner contacted. If the coroner determines the remains are Native American, the coroner shall contact the Native American Heritage Commission. The Native American Heritage Commission shall identify the person or persons believed to be most likely descended from the deceased Native American. The most likely descendent shall make recommendations regarding the treatment of the remains with appropriate dignity.

### **4.5.2. EXISTING CONDITIONS**

The proposed project site is currently developed as a paved basketball court, man-made detention basin, paved walkway and surrounding trees and landscaping. The proposed project would not include the

demolition of any buildings, but would include demolition of paved areas, tree removal, grading and construction. No archaeological, paleontological or geological resources or human remains are known to exist on site.

### **4.5.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following cultural resources criteria.

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				✓
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		✓		
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				✓
d. Disturb any human remains, including those interred outside of formal cemeteries?		✓		

**a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in section 15064.5?**

The 2010 EIR found that the 2009 Master Plan would have no impact on historic resources. No buildings on the SHS Campus are listed on the National Register of Historic Places, California Register, or any local registers. In addition, the proposed project would not include demolition of any existing structures. Therefore, the proposed project would not result in any impacts related to historic resources as defined in Section 15064.5 beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?**

The 2010 EIR found that there are no known archaeological resources on the SHS campus. The proposed Practice Gym site would be located within the existing campus boundaries; therefore, there are no known archaeological resources on this site.

However, as with any project that requires earthmoving or grading activities, there is the possibility that buried archaeological deposits could be present and accidental discovery could occur during project construction activities. In the event that archaeological remains are uncovered, the proposed project would incorporate 2010 EIR Mitigation Measure CR-1. Therefore, the proposed project would not result in any impacts related to archaeological resources beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** Less Than Significant With Mitigation

**2010 Mitigation:** 2010 EIR Mitigation Measures CR-1

**2012 Mitigation:** 2010 EIR Mitigation Measures CR-1

**Significance After Implementation:** Less Than Significant (No New Impact)

**c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

The 2010 EIR found no paleontological resources or unique geologic features on the SHS campus. The SHS Campus is located on level land that has been developed as a school campus. The proposed Practice Gym site would be located within the existing campus boundaries and there are no known paleontological or geologic resources on the site. Therefore, the proposed project would not result in any impacts related to paleontological or geologic resources beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project disturb any human remains, including those interred outside of formal cemeteries?**

The 2010 EIR found that all known human remains on the SHS campus were buried within the confines of a small private cemetery. Since the proposed project site would be located within the existing campus boundaries and outside of this cemetery, there are no known human remains on this site. However, as with any project that requires earthmoving or grading activities, there is the possibility that buried human remains could be present and accidental discovery could occur during construction activities. In the event

that human remains are uncovered, the proposed project would incorporate 2010 EIR Mitigation Measure CR-2. Therefore, the proposed project would not result in any impacts related to the discovery of human remains beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** Less Than Significant With Mitigation

**2010 Mitigation:** 2010 EIR Mitigation Measures CR-2

**2012 Mitigation:** 2010 EIR Mitigation Measures CR-2

**Significance After Implementation:** Less Than Significant (No New Impact)

### **4.6. GEOLOGY AND SOILS**

This section evaluates the potential geology impacts of amending the 2009 Master Plan to include the proposed project.

#### **4.6.1. PRIOR ANALYSIS AND CONCLUSIONS**

##### **4.6.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have less than significant impacts related to geology and soils. The campus is subject to periodic groundshaking due to the nearby San Andreas fault. However, all Master Plan buildings and improvements would be constructed to comply with the California Building Code's requirements for public school facilities, which would reduce potential impacts to a less than significant level.

The surface topography of the campus is flat; therefore, landslides are not considered a hazard and the potential for soil erosion is low. All grading activities would be conducted in accordance with Geotechnical Reports to be prepared for all future improvements in the Master Plan area. There is potential for liquefaction and soil expansion, but the Master Plan includes preventative design measures based on Geotechnical Report findings that would reduce potential impacts to a less than significant level.

##### **4.6.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.6.2. EXISTING CONDITIONS**

The proposed project site is relatively flat. According to the Town of Atherton General Plan and the Geotechnical Report prepared for the Lower/Middle School buildings, the campus is not located within an Alquist-Priolo Earthquake Fault Zone.<sup>21</sup> The campus is located 2.5 miles west of the San Andreas Fault. However, there are no known active or potentially active faults within the Town. According to a Geotechnical Report prepared for the Lower/Middle School project, the campus is not located in a liquefaction zone as identified in the California Geotechnical Survey Hazard Zone Report No. 111 (2006).

#### **4.6.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following geology and soils criteria.

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<sup>21</sup> *Geotechnical Study/Soil and Foundation Investigation, Proposed Improvements at Saint Joseph School, Library and Class Room Buildings, One and Two-Story Above-Grade Structures, 50 Emilie Street, Atherton, California. AST Geotechnical and Environmental Consulting Engineers, March 2009.*

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. 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 Pub. 42.				✓
ii. Strong seismic ground shaking?			✓	
iii. Seismic-related ground failure, including liquefaction?			✓	
iv. 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, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			✓	
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				✓

**ai. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving 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?**

The 2010 EIR noted that according to the Town General Plan and the Geotechnical Report<sup>22</sup> prepared for the Lower/Middle School buildings, the SHS campus is not located within an Alquist-Priolo<sup>23</sup> Earthquake Fault Zone, but is located 2.5 miles west of the San Andreas Fault. However, there are no known active or

<sup>22</sup> AST Geotechnical and Environmental Consulting Engineers, *Geotechnical Study/Soil and Foundation Investigation, Proposed Improvements at Saint Joseph School, Library and Class Room Buildings, One and Two-Story Above-Grade Structures, 50 Emilie Street, Atherton, California, March 2009.*

<sup>23</sup> California Department of Conservation, *Division of Mines and Geology, State of California Special Studies Zones: Palo Alto Quadrangle, 1974.*

potentially active faults within the Town.<sup>24</sup> Therefore, the proposed project would not result in any impacts related to the rupture of a known earthquake fault beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**aii. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?**

As described in the 2010 EIR, the campus is subject to periodic, strong seismic groundshaking from multiple faults in the region, but especially from the San Andreas Fault, which is 2.5 miles away. A Geotechnical Report would be prepared for the proposed project with detailed information on geologic site conditions and recommendations for design measures to be incorporated into building plans. Also, project design and construction techniques would comply with the California Building Code's requirements for public school facilities, which are more stringent than those for general structures and which would reduce potential impacts to a less than significant level. Therefore, the proposed project would not result in any impacts related to strong seismic groundshaking beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**aiii. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?**

Liquefaction refers to the sudden, temporary loss of soil strength during strong ground shaking. The 2010 EIR noted that the campus is not located in a liquefaction zone as identified in the California Geotechnical Survey Hazard Zone Report No. 111 (2006).<sup>25</sup> However, based on historic groundwater elevation and data, the 2010 EIR found that there is some potential for liquefaction on campus.<sup>26</sup> The Geotechnical Report to be prepared for the proposed project site would include design recommendations that would reduce potential impacts from liquefaction to a less than significant level. Therefore, the

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<sup>24</sup> Association of Bay Area Governments (ABAG), *Earthquakes and Hazards Program*, 2011.

<sup>25</sup> AST Geotechnical and Environmental Consulting Engineers, *Geotechnical Study/Soil and Foundation Investigation, Proposed Improvements at Saint Joseph School, Library and Class Room Buildings, One and Two-Story Above-Grade Structures, 50 Emilie Street, Atherton, California, March 2009.*

<sup>26</sup> Bagg Engineers, *Soils Testing for St. Joseph's School Site, Sacred Heart Schools, Atherton, California.*

proposed project would not result in any impacts related to liquefaction beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**aiv. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?**

As discussed in the 2010 EIR, landslides on the project site are not considered a hazard because the surface topography of the entire campus, including the proposed project site, is relatively flat. Therefore, the proposed project would not result in any impacts related to landslides beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project result in substantial soil erosion or the loss of topsoil?**

As described in the 2010 EIR, the campus, including the proposed project site, is relatively flat. As a result, the potential for soil erosion is low. The project would involve grading for the Practice Gym and emergency vehicle pad, as well as soil removal for the detention basin expansion.

All grading activities on the proposed project site would be conducted in accordance with the requirements outlined in the project's Geotechnical Report. Additionally, topsoil removed during construction of the Practice Gym and emergency vehicle pad would be either paved over or replaced and planted with turf and other vegetation. Topsoil removed during expansion of the detention basin would be replaced with native grasses and plants. With implementation of these measures, it is not anticipated that any impacts related to substantial soils erosion or the loss of topsoil would result. Therefore, the proposed project would not result in any impacts related to erosion or the loss of topsoil beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project 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?**

As stated above, the 2010 EIR found no risk of landslides due to the flat topography of the campus. Also, as found in the Geotechnical Report prepared for the Lower/Middle School campus as part of the 2009 Master Plan, the campus has a low potential for lateral spreading, subsidence, liquefaction or collapse. The Geotechnical Report to be prepared for the proposed project would include design recommendations to reduce potential impacts from lateral spreading, subsidence, liquefaction or collapse to a less than significant level. Therefore, the proposed project would not result in any impacts related to unstable geologic units or soils beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?**

According to the 2010 EIR, soils on campus have a moderate to high expansion potential when subject to fluctuations in moisture content, so soils on the proposed project site may be at risk for expansion. The Geotechnical Report to be prepared for the project would include design recommendations to reduce potential impacts from expansive soil to a less than significant level. Therefore, the proposed project would not result in any impacts related to expansive soil beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

As discussed in the 2010 EIR, no septic systems are proposed for any buildings in the 2009 Master Plan. Additionally, the Practice Gym would not require any connections to any wastewater treatment facilities. Therefore, the proposed project would not result in any impacts related to septic tanks or alternative wastewater disposal systems beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### 4.7. GREENHOUSE GAS EMISSIONS

This section evaluates the potential greenhouse gas emissions impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.7.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.7.1.1. 2010 EIR Impact Findings Summary

Sources of GHG emissions from the proposed project arise out of both construction and operation and include motor vehicles, natural gas consumption, electricity generation, and water consumption. The 2010 EIR concluded that the 2009 Master Plan would be consistent with all feasible and applicable strategies of the 2006 CAT Report and the recommended measures of ARB Scoping Plan to reduce GHG emissions in California.

The 2010 EIR concluded that the Master Plan would have a less than significant impact on GHG emissions:

**Impact AQ-5: Implementation of the 2009 Master Plan is not inconsistent with applicable guidance documents issued in furtherance of AB32 to date, including the 2006 CAT Report and the ARB Scoping Plan.**

Generally, the evaluation of an impact under CEQA requires measuring data from a project against a “threshold of significance”. At present, there are no officially adopted greenhouse gas emission significance thresholds for the State, Town or air district. Thus, prior to having a significance threshold for GHGs emissions that has been formally adopted by the State, the air agency or the local municipality, emissions of GHGs resulting from the 2009 Master Plan were quantified but could not be compared to a quantitative threshold.

Pursuant to CEQA Guidelines Section 15064.4(a), the Town made an effort, based on the scientific and factual data available, to calculate the amount of GHG emissions that would result from the 2009 Master Plan. GHG emissions from the 2009 Master Plan were calculated for both construction and operation. Sources of emissions included motor vehicles, natural gas consumption, electricity generation, and water consumption.

In calculating the GHG emissions from the 2009 Master Plan, the future fuel consumption rates and water use by these sources were estimated based on the proposed land uses. The GHG emission factors from the California Climate Action Registry (CCAR) Protocol for natural gas and electricity were then applied to the respective consumption rates, to calculate annual GHG emissions in metric tons. GHG emissions from water consumption were determined by evaluating the water-related energy use relationship identified in the California Energy Commission (CEC’s) California’s Water-Energy Relationship document. The on-road mobile vehicle miles per day and vehicle fleet mix with the Master Plan were estimated using the URBEMIS 2007 computer model and sources of assumed miles per gallon were based upon the National Highway Traffic Safety Administration Summary of

Fuel Economy Performance and the U.S. Department of Energy Transportation Energy Book. The GHG emission factors from the CCAR Protocol for motor vehicles were applied to calculate annual GHG emissions in metric tons.

Based on this methodology, construction emissions of the 2009 Master Plan would be 738 tons (carbon dioxide equivalents [CO<sub>2</sub>e]). Operational emissions were estimated as follows: natural gas use (54 tons CO<sub>2</sub>e), electrical use (87 tons CO<sub>2</sub>e), motor vehicles (341 tons CO<sub>2</sub>e), and water consumption (0.7 tons CO<sub>2</sub>e).

The 2009 Master Plan was evaluated and found to be consistent with all strategies from the 2006 Climate Action Team (CAT) Report and all recommended measures of the ARB Scoping Plan to reduce GHG emissions in California.

### **4.7.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

### **4.7.2. EXISTING CONDITIONS**

As described in the 2010 EIR, the BAAQMD has estimated 2007 GHG emissions for San Mateo County, based on standards for criteria pollutant inventories. The estimated GHG emissions are presented in carbon dioxide equivalents, which weight each GHG by its global warming potential. In San Mateo County, transportation emissions were highest, at 4.8 million tons CO<sub>2</sub>e per year, followed by industrial/commercial, electricity/co-generation, residential fuel and off-road equipment emissions. As discussed above, the 2010 EIR found that campus-related emissions were due mostly to transportation, followed by electrical use, natural gas use, and water consumption.

The project site currently consists of an outdoor basketball court, detention basin, pedestrian pathway and surrounding landscaping. There are no GHG emissions sources associated with the site.

### **4.7.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The 2010 EIR evaluated greenhouse gas emissions as part of the air quality analysis. Since the preparation of the 2010 EIR, the California Office of Public Resources (OPR) has updated Appendix G of the State CEQA Guidelines to address impacts of GHG emissions, as directed by SB 97 (2007).<sup>27</sup> The amendment became effective March 18, 2010. Although the amendments provide criteria to evaluate a project's GHG emissions, they do not establish quantitative significance thresholds. According to the revised Appendix G of the State CEQA Guidelines, an impact related to global climate change is considered based on the following criteria.

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<sup>27</sup> *California Office of Public Resources (OPR), Appendix G of the State CEQA Guidelines, 2010.*

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emission, 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 emission of greenhouse gases?			✓	

**a. Would the project generate greenhouse gas emission, either directly or indirectly, that may have a significant impact on the environment?**

The 2010 EIR analysis found that the construction and operation of the 2009 Master Plan would generate emissions. The EIR did not specifically evaluate these estimated emissions against a performance threshold because such a threshold does not currently exist. Similarly to the 2009 Master Plan, the proposed project would generate emissions during both construction and operation. Construction emissions would include the use of construction equipment during grading, construction and paving, haul truck trips to the site and construction worker trips to the site. These construction-related impacts would be limited in scope and short-term in duration. Operational emissions would include direct emissions from burning natural gas for heating, as well as indirect emissions associated with the use of electricity for lighting.

most of these operational emissions are already accounted for in the 2009 Master Plan, because the Plan accounted for a practice gym as part of the McGanney Gym renovation. The proposed project would only result in GHG emissions associated with the net square footage increase of 12,000 square feet, an increase of less than 4 percent. This amount of increase is considered a less than significant contribution to operational GHG emissions. No vehicle-related GHG emissions would be expected during project operation. In fact, the project could reduce vehicle travel to campus by allowing basketball practice to begin earlier, thereby reducing existing vehicle trips. Since there would be no transportation-related emissions and no net increase in emissions associated with operation of the Practice Gym, the proposed project would not result in significant impacts related to GHG emissions beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?**

The 2010 EIR found that the Master Plan was consistent with all strategies from the 2006 CAT Report and all recommended measures of the ARB Scoping Plan to reduce GHG emissions in California. As described above, construction would generate a small amount of GHG emissions from vehicle and equipment emissions and paving. Operation of the Practice Gym would also generate GHG emissions related to lighting and heating the building. While the BAAQMD has not adopted GHG thresholds of significance,<sup>28</sup> the estimated project GHG emissions would be a very small percentage of the overall GHG emissions that occur in the BAAQMD. Also, emissions sources are regulated by existing regulations that would reduce the GHG emissions associated with these sources in the future. Given that the level of GHG emissions would be so low, the proposed project would not be expected to conflict with State plans adopted for the purpose of reducing GHG emissions. Thus, the proposed project would be consistent with all applicable local plans, policies and regulations and would not conflict with the provisions of AB 32, the applicable air quality plan, or any other State or regional plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. Therefore, the proposed project would not result in any impacts related to plans, policies or regulations related to GHG emissions beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

#### **4.8. HAZARDS AND HAZARDOUS MATERIALS**

This section evaluates the potential hazards and hazardous materials impacts of amending the 2009 Master Plan to include the proposed project.

##### **4.8.1. PRIOR ANALYSIS AND CONCLUSIONS**

###### **4.8.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have less than significant impacts related to hazardous materials:

**The 2009 Master Plan would not create a significant hazard through the routine transport, use, or disposal of hazardous materials as part of its routine operations.**

The 2009 Master Plan would utilize limited quantities of hazardous materials such as common cleaning and maintenance materials, which would be stored, used and disposed of in accordance

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<sup>28</sup> *California Air Pollution Control Officers Association (CAPCOA), CEQA & Climate Change. January 2008.*

with applicable regulations. In addition, chemicals would be used in small amounts in science classes for educational purposes under the supervision of an instructor trained in the proper use, storage, and disposal of these chemicals. SHS is subject to and would continue to follow County, State, and federal requirements to minimize exposure and ensure safe use, storage, and disposal of all chemicals.

**The 2009 Master Plan 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.**

According to the SHS there are no known hazardous materials sites on the campus. Soil testing was conducted in the areas where demolition and construction would occur (Lower/Middle School campus and sports fields) for lead, pesticides, and gasoline and diesel hydrocarbons. This testing found no traces or trace amounts well under Title 22 limits or Regional Water Quality Control Board (RWQCB) Screening Levels. The demolition of the Lower/Middle School buildings, which were constructed in the 1950s, might result in discovery of hazardous materials such as lead based paint or asbestos. As required, SHS would file a Demolition Plan with the Town specifying required procedures to prevent worker and public exposure of any suspected hazardous materials.

**The 2009 Master Plan would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.**

The 2009 Master Plan would, by its nature, not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Hazardous materials uncovered during demolition would be addressed as noted above.

**The 2009 Master Plan is not located on a site included on a list of hazardous materials sites.**

The campus is not located on a list of hazardous materials sites.<sup>29</sup> Therefore, implementation of the Master Plan would not create a significant hazard to the public or the environment related its location on a hazardous materials site.

**The 2009 Master Plan would not be located within a public airport land use plan area, or within two miles of a public airport, would not result in a safety hazard to people residing or working in the Project area.**

The closest public airport is the San Carlos Airport (San Mateo County), which is located approximately 5.25 miles from the campus, over 2 miles away.

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<sup>29</sup> *Department of Toxic Substances Control, EnviroStor, Selection for "94027."*

**The 2009 Master Plan would not be located within the vicinity of a private airstrip and would not subject area residents and workers to a safety hazard.**

The campus is not located within the vicinity of a private airstrip, and therefore the Master Plan would not result in a safety hazard for people residing or working in the Master Plan area.

**The 2009 Master Plan would be located in proximity to wildland areas that could pose a potential fire hazard and could affect persons or structures in the area in the event of a fire.**

The Town is located in an urbanized area. According to the California Department of Forestry and Fire Protection, the Town is not classified as a Fire Threatened Community and is not at risk to wildland fires.<sup>30</sup>

**The 2009 Master Plan would not interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan nor would it generate traffic congestion that would interfere with the execution of such a plan.**

The Master Plan would not involve changes to the existing surrounding arterial street network, and therefore would not directly impact emergency response planning. The Master Plan proposes changes to circulation around the campus, including changes to access from the campus to Park Lane and Emilie Avenue. Also, the Master Plan could result in an increase in congestion on area streets, including streets used for emergency routes. The potential for significant impacts related to emergency response planning indirectly through an increase in congestion was evaluated in Section IV.G (Transportation/Traffic) of the Draft EIR.

#### **4.8.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.8.2. EXISTING CONDITIONS**

The proposed project site is currently paved and in use as an open-air basketball court. The project site includes a detention basin, paved walkway and surrounding vegetation. No hazardous materials are handled on site.

#### **4.8.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following hazards and hazardous materials criteria.

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<sup>30</sup> California Department of Forestry and Fire Protection, *Wildland Urban Interface -Fire Threatened Communities Map, 2003.*

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation 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, would 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 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				✓
f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				✓
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			✓	
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			✓	

**a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

As described in the 2010 EIR, the Master Plan would use small quantities of hazardous materials for cleaning and in science classes, but SHS would follow accepted procedures to ensure safety. Likewise, operation of the Practice Gym would involve the use of cleaning agents and there would be a janitorial closet in the building where cleaning products would be stored. Similar to other janitorial closets located on the SHS Campus, cleaning agents would be stored and handled properly.

During construction activities, hazardous materials such as oil, diesel fuel, and gasoline may be transported to, and used at, the specific construction area. Construction contractors would be required to handle these substances in accordance with the California State Department of Toxic Substances Control (DTSC) and transportation regulations, which regulate proper hazardous waste handling, storage, disposal, and transport methods. Therefore, the proposed project would not result in any impacts related to plans, policies or regulations related to the routine transport, use or disposal of hazardous materials beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project 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?**

The 2010 EIR found no known hazardous materials sites on the campus based on soils testing conducted where demolition and construction would occur, and noted that construction crews would follow best practices in demolition of old school buildings to avoid public exposure of hazardous materials. The proposed project would not involve demolition of an existing building. Operation of the proposed project would not require routine use or transportation of hazardous materials, and therefore there would be no hazards to the public or the environment through reasonably foreseeable upsets and accident conditions involving the release of hazardous materials into the environment.

During construction the potential exists for accidental spills and leaks of lubricants and other fluids from vehicles and equipment. If an accidental release of these materials were to occur, it could pose a threat to surface or ground water quality if contaminants were to enter storm drains or a creek, or if the public came into contact with the spilled material. Construction workers would follow established best practices in order to mitigate this risk. Therefore, the proposed project would not result in any impacts related to plans, policies or regulations related to releasing hazardous materials into the environment beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

The proposed project would be located within the existing campus boundaries. The 2010 EIR noted that since the Master Plan consisted of a school campus which would not require the use of hazardous

materials on the site and would not emit hazardous emissions. Therefore, the proposed project would not result in any impacts related to plans, policies or regulations related to emitting hazardous emissions beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project 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, would create a significant hazard to the public or the environment?**

The 2010 EIR noted that the 2009 Master Plan would be located on the SHS Campus, and is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, there would be no impacts beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?**

As described in the 2010 EIR, the closest public airport to the SHS campus is the San Carlos Airport, which is over 2 miles away. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in safety hazards for people residing or working on campus beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?**

As described in the 2010 EIR, the campus is not located within the vicinity of a private airstrip. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in safety hazards for people residing or working on campus beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The 2010 EIR noted that the 2009 Master Plan would not affect the surrounding arterial street network but would change circulation on local streets, which could affect emergency response planning indirectly through congestion. The proposed project would not generate any additional traffic and would therefore not affect circulation on any streets. Therefore, the proposed project would not result in impacts to emergency response plans beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?**

As described in the 2010 EIR, the campus is located in an urbanized area, and the Town is not classified as a Fire Threatened Community. Since the project would be located within the existing campus boundaries, the proposed project would not result in impacts to emergency response plans beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### 4.9. HYDROLOGY AND WATER QUALITY

This section evaluates the potential hydrology and water quality impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.9.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.9.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the 2009 Master Plan would have less than significant impacts related to water quality, groundwater recharge, drainage patterns, stormwater runoff or flooding, construction within a 100-year floodplain, inundation by seiche, tsunami, or mudflow:

**The 2009 Master Plan would not violate any water quality standards or waste discharge requirements nor would it otherwise substantially degrade water quality.**

The Master Plan would involve the construction of replacement school facilities on an existing school campus and would not result in the construction of a facility that would create or discharge large amounts of polluted water that would violate any water quality standards or waste discharge requirements nor would it otherwise substantially degrade water quality.

**The 2009 Master Plan would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level.**

The campus is connected to municipal water supplies and the Master Plan does not propose any wells or use of groundwater supplies. However, the Master Plan would include the construction of impervious surfaces on the site, which could limit groundwater recharge in the area. The watershed area for the Lower/Middle School Campus is estimated to be approximately 23.2 acres and currently developed with 38 percent impervious area. The watershed for the entire Master Plan area is 64 acres and currently developed with 33 acres (46 percent) impervious surface area. The Master Plan would increase impervious surfaces on campus, including 8 acres of synthetic turf playfields. Construction of the 2009 Master Plan components would result in a total of 45 acres of impervious surfaces (70 percent of the Master Plan area).<sup>31</sup> However, the Master Plan includes stormwater detention calculations to ensure that stormwater detention devices meet all San Mateo County Drainage Manual (SMCDM) requirements. The Master Plan would include detention and treatment devices to retain all runoff from the Master Plan area at pre-development levels, allowing for groundwater recharge. All future Master Plan facilities would be required to be designed in conformance with SMCDM requirements.

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<sup>31</sup> *Personal Communication with Sandy Dubinsky, Sacred Heart Schools, March 12, 2010.*

**The 2009 Master Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.**

There are no streams or rivers within the Master Plan area. The campus is level and grading activities would not substantially alter the existing drainage pattern of the site or area. However, grading activities would be required for construction activities on the site, which could expose surface soils to erosion and could potentially result in sediment discharges to surface water.

As part of the conditions of approval, Master Plan construction activities would be required to adhere to the RWQCB requirements and, if applicable, the National Pollution Discharge Elimination System (NPDES). SHS would be required to submit and implement a Storm Water Pollution Prevention Plan (SWPPP) for the Master Plan, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SWPPP would detail the treatment measures and best management practices (BMPs) to control pollutants and an erosion control plan that outlines erosion and sediment control measures that would be implemented during the construction and post-construction phases of Master Plan development.

**The 2009 Master Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.**

There are no streams or rivers on the site. The campus is level and grading activities would not substantially alter the existing drainage pattern of the site or area. However, grading activities would be required for construction activities on the site, which could increase the rate or amount of surface runoff on the site. However, stormwater detention and treatment requirements would be incorporated into the Master Plan.

**The 2009 Master Plan would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems nor provide substantial additional sources of polluted runoff.**

Stormwater runoff from the Master Plan site would be subject to stormwater detention and treatment requirements meeting the Town of Atherton and RWQCB design criteria. Stormwater detention would be accomplished by limiting any stormwater discharge from the Master Plan to pre-development levels. Stormwater treatment would be accomplished by directing the raw stormwater to either a bioretention area or a vegetated swale.

**The 2009 Master Plan would not otherwise substantially degrade water quality.**

The Master Plan would use treatment devices to clean and treat stormwater runoff. Bioretention BMPs would be implemented that use a soil and plant-based filtration device to remove pollutants through a variety of physical, biological, and chemical treatment processes. These facilities would consist of a permeable bed, ponding area, organic or mulch layer, planting soil, and plants. The raw stormwater runoff would be distributed evenly along a ponding area. Infiltration of the stored

water in the bioretention area planting soil and into the underlying soils or underdrain system would occur over an extended period of time.

**The 2009 Master Plan would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map.**

A replacement residential building (The Gatehouse) would be constructed to house six nuns and would include a full size kitchen, a smaller kitchen and six bedrooms. According to the Town General Plan there are no areas in the Town within the 100-year flood plain.<sup>32</sup>

**The 2009 Master Plan would not expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam.**

The closest reservoir is Bear Gulch Reservoir, approximately two miles from the campus. Bear Gulch Reservoir is located at approximately 200 feet in elevation, which is higher than the campus. In the event that flooding would occur from the Reservoir, water would flow towards the San Francisco Bay and the campus, but it is not likely that the campus would be flooded due to the many structures within a two mile distance between the Reservoir and campus.

**The 2009 Master Plan site would not be subject to inundation by seiche, tsunami, or mudflow.**

The campus is not located sufficiently close to the San Francisco Bay or the Pacific Ocean to be at risk from seiches or tsunamis.<sup>33</sup> There would be no risk of mudflow because the campus is located on level ground.

#### **4.9.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.9.2. EXISTING CONDITIONS**

The proposed project site area totals approximately 35,157 square feet in size. The proposed project site is currently in use as a paved basketball court, pedestrian walkways, a detention basin and surrounding turf and other landscaping. Existing paved (impervious) area on the site totals 10,037 square feet. The existing 8,500 cubic foot detention basin is planted with native grasses and serves to retain and treat stormwater from the basketball court and other nearby impervious surfaces such as the Homer Science building roof.

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<sup>32</sup> *Town of Atherton General Plan, Page LU-7.*

<sup>33</sup> *California Geologic Survey (CGS), Alameda County Tsunami Inundation Maps: Palo Alto Quadrangle, 2009.*

**4.9.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following hydrology criteria.

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Violate any water quality standards or waste discharge requirements?			✓	
b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			✓	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site?			✓	
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?			✓	
e. Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			✓	
f. Otherwise substantially degrade water quality?			✓	
g. Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				✓
h. Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				✓
i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?			✓	
j. Inundation by seiche, tsunami, or mudflow?				✓

**a. Would the project violate any water quality standards or waste discharge requirements?**

As noted in the 2010 EIR, the 2009 Master Plan would not result in the construction of a facility that would create or discharge large amounts of polluted water that would violate any water or waste quality standards. The proposed project would consist of a Practice Gym, pedestrian walkways, a detention basin, and landscaping and. The Practice Gym would not include any water using devices or activities that would general waste water. As such, the project would not create or discharge large quantities of polluted water. Therefore, the proposed project would not result in impacts to water quality standards or waste discharge requirements beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level?**

The 2010 EIR explains that 2009 Master Plan does not propose the use of any wells or groundwater supplies, since the campus is connected to the municipal water system. However, the Master Plan would include a net increase in impervious surfaces on the site, which could limit groundwater recharge in the area. In order to mitigate this increase in impervious surfaces, the Master Plan included detention and treatment devices to retain all runoff from the Master Plan area at pre-development levels, allowing for groundwater recharge.

The proposed project would result in the construction of the new Practice Gym and widened pedestrian pathway to accommodate emergency vehicles. The project site area is 35,157 square feet in size. The project would result in the replacement of the existing 10,037 square feet of impervious surface on the project site with 16,605 square feet of impervious surfaces, for a total increase in impervious surfaces on the site of 6,568 square feet.

However, the project would expand the existing 8,500 cubic foot detention basin to 10,960 cubic feet to accommodate the increase in impervious surface on the site. Over time, treated stormwater would travel downward, contributing to ground water recharge. Therefore, the proposed project would not result in impacts to aquifer supplies beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off-site?**

As described in the 2010 EIR, there are no streams or rivers on this level campus, but grading activities as part of the 2009 Master Plan could lead to erosion or surface runoff during construction. The Master Plan would avoid erosion or flooding impacts by implementing a SWPPP.

Similarly, the proposed project would involve grading and earthmoving activities. These activities would adhere to RWQCB construction requirements and implement the construction-phase and post-construction BMPs included in the Master Plan SWPPP in order to prevent on- or off-site erosion. SHS would be required to submit and the Town would oversee implementation of a Storm Water Pollution Prevention Plan (SWPPP) for the project, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity. The SWPPP would detail the treatment measures and best management practices (BMPs) to control erosion and sediment control measures that would be implemented during the construction and post-construction phases of project development. Therefore, the proposed project would not result in impacts to existing drainage patterns beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off-site?**

As described in the 2010 EIR, there are no streams or rivers on the campus, but grading activities as part of the 2009 Master Plan could lead to surface runoff. The Master Plan would avoid flooding impacts by implementing a SWPPP that control stormwater during construction. Stormwater treatment and detention would meet the requirements of the Town of Atherton (Atherton's drainage criteria refer to the San Mateo County Drainage Manual [SMCDM]) and RWQCB design criteria.

Similarly, the proposed project would adhere to RWQCB requirements and implement the construction-phase and post-construction BMPs included in the Master Plan SWPPP in order to prevent on- or off-site flooding. Stormwater runoff on the site currently drains to the existing stormwater detention basin. Drainage on the site following construction of the project would continue to drain to the detention basin. As specified in the 2010 EIR, the project would be designed in conformance with SMCDM requirements, including sizing the detention basin to accommodate the additional impervious surface. Therefore, the proposed project would not change existing drainage patterns in a manner that would result in flooding impacts to beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?**

The 2010 EIR explains that the 2009 Master Plan would generate additional runoff would be generated due to the increase in impermeable surfaces. This water would all be retained and treated on site; therefore, post-construction stormwater runoff would not exceed pre-construction runoff. SHS prepared a hydromodification (HMP) analysis for the Master Plan using San Francisco Bay RWQCB permit criteria for HMPs. These criteria require that post-construction flows match the duration-frequency relationship of pre-project flows between a flow rate equal to 10 percent of the 2-year flow and the 10-year flow.

Similar to the Master Plan, the proposed project would result in a net increase in impervious surface area. The proposed project would result in the construction of the new Practice Gym and widened pedestrian pathway to accommodate emergency vehicles. The project also includes the expansion of an existing detention basin. The project site area is 35,157 square feet in size. The project would result in the replacement of the existing 10,037 square feet of impervious surface on the project site with 16,605 square feet of impervious surfaces, for a total increase in impervious surfaces on the site of 6,568 square feet.

All runoff would be detained in the on-site detention pond and metered through a control structure. The project would expand the existing 8,500 cubic foot detention basin to 10,960 cubic feet. This expansion would exceed the detention volume required for the 100-year storm. The detention basin would be designed to allow the discharge of the retained water in no more than 36 to 48 hours. Therefore, the expanded detention basin would be sufficiently sized to accommodate the additional runoff and runoff generated from the project would not exceed the capacity of the current stormwater infrastructure. Therefore, the proposed project would not result in impacts to storm water drainage system capacity beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**f. Would the project otherwise substantially degrade water quality?**

The 2010 EIR explains that the 2009 Master Plan would use bioretention BMPs to treat stormwater runoff. Vegetated swales would be designed to treat runoff by filtering the untreated stormwater through the vegetation in the channel, filtering through the subsoil matrix, and/or infiltration into the underlying

soils. Similarly, the proposed project would expand the existing vegetated detention basin on site and use this basin to naturally treat stormwater runoff. Stormwater would filter through natural grasses into a ponding area, organic or mulch layer, planting soil, and plants. Therefore, the proposed project would not result in water quality degradation impacts beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?**

As noted in the 2010 EIR, the campus is not within a 100-year flood hazard area. Additionally, the proposed project is a Practice Gym and does not include any housing. Therefore, the proposed project would not result in flood hazard impacts beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**h. Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?**

As noted in the 2010 EIR, the campus is not within a 100-year flood hazard area. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in flood hazard impacts beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of the failure of a levee or dam?**

As noted in the 2010 EIR, the Bear Gulch Reservoir is approximately two miles from the campus. The campus would be at risk of flooding if the Reservoir flooded, but the risk is minor due to the many structures within a two mile distance between the Reservoir and campus. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in levee or dam failure impacts beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**j. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of a tsunami or seiche?**

As explained in the 2010 EIR, the campus is not located sufficiently close to the San Francisco Bay or the Pacific Ocean to be at risk from seiches or tsunamis.<sup>34</sup> Additionally, there is no risk of mudflow because the campus is located on level ground. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in tsunami or seiche impacts beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

#### **4.10. LAND USE AND PLANNING**

This section evaluates the potential land use and planning impacts of amending the 2009 Master Plan to include the proposed project.

##### **4.10.1. PRIOR ANALYSIS AND CONCLUSIONS**

###### **4.10.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have no impacts related to land use and planning:

**Impact LU-1: Implementation of the 2009 Master Plan would not physically divide an established community.**

The 2009 Master Plan would involve the construction of replacement school buildings, construction of parking areas, relocation of sports fields, and other site improvements such as landscaping. Since the Master Plan would be within the boundaries of an existing campus and would not involve construction of a major physical feature, the Plan would not physically divide an established community.

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<sup>34</sup> *California Geologic Survey (CGS), Alameda County Tsunami Inundation Maps: Palo Alto Quadrangle, 2009.*

**Impact LU-2: Implementation of the 2009 Master Plan would not conflict with any applicable land use policy.**

The 2009 Master Plan is not a Town regulatory land use plan, but is a Master Plan as conceived by SHS to guide construction and maintenance of campus and educational facilities to meet educational goals. Private schools in Atherton are requested to submit Campus Master Plans to the Town for public informational purposes.<sup>35</sup> The Master Plan would not become part of the Town's General Plan or land use planning policy. Therefore, the 2010 EIR consistency analysis compared the SHS Master Plan with the Town of Atherton General Plan policies and found no inconsistencies.

**Impact LU-3: Implementation of the 2009 Master Plan would not conflict with any Applicable Habitat Conservation Plan or Natural Community Plan.**

There are no Habitat Conservation Plans or Natural Community Plans that are applicable to the campus.

#### **4.10.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.10.2. EXISTING CONDITIONS**

The proposed project site is located on the SHS Campus, which is governed by the SHS 2009 Master Plan as well as the Town of Atherton General Plan. Like the rest of the SHS campus, the site is designated as Public Facilities and Schools in the General Plan and the site is zoned Public Facilities and Schools (PFS). Outside the campus, surrounding neighborhood parcels are designated as Low Density Single Family Residential (zoned R-1A) and Parks and Open Space (zoned POS). The proposed project site is in use as a school basketball court, which is consistent with the General Plan land use designation and zoning for the site.

#### **4.10.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following land use and planning criteria.

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<sup>35</sup> *Town of Atherton General Plan, 1.550 Schools, Page LU-6 and Town of Atherton Municipal Code, 17.36.030.*

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?				✓
b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.				✓
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				✓

**a. Would the project physically divide an established community?**

The 2010 EIR found that since the 2009 Master Plan would stay within existing campus boundaries, the Plan would not create any new barriers to movement. The proposed project would be located within campus boundaries, so the same reasoning would apply. Therefore, the project would not result in conflicts with any habitat conservation plan beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?**

The 2010 EIR compared the 2009 Master Plan to the Town's General Plan policies and found no inconsistencies. The proposed project would also be consistent with General Plan policies, as indicated in Table 4.10-1. Therefore, the proposed project would not result in conflicts with any applicable land use plan beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**Table 4.10-1  
Town of Atherton General Plan Land Use Policy Consistency**

Applicable Goal / Policy	Consistency Issue(s)
<b>Land Use Element</b>	
<b>Land Use Goal 1.210.</b> To preserve the Town’s character as a scenic, rural, thickly wooded residential area with abundant open space.	<b>Consistent.</b> Although the proposed project would require the removal of 18 trees to accommodate construction of the Practice Gym, up to 24 trees would be replanted in order to preserve the rural, wooded character of the site in keeping with the residential areas surrounding SHS campus.
<b>Land Use Objective 1.223.</b> To retain the high quality of maintenance and living environment existing in the Town’s residential neighborhoods.	<b>Consistent.</b> The proposed project would be located on a site already developed and used as a basketball court. The Practice Gym would be designed to match the adjacent Homer Science Building. Therefore, the project would avoid any potential intrusion of institutional uses on residential uses, including changes to visual quality and noise. These project design features would maintain the high quality living environment of the Town’s residential neighborhoods.
<b>Open Space Land Use Policy 1.421.</b> The Town shall continue to preserve the open space characteristics of existing schools, churches and park facilities.	<b>Consistent.</b> See response to Land Use Goal 1.210 and Land Use Objective 1.223.
<b>Public and Quasi-Public Land Use Policy 1.584.</b> The Town supports recycling as a means of reducing the amount of waste material requiring disposal in the landfill. The Town’s objective is to reduce the amount of waste material by continuing to participate in the South Bayside Waste Management Authority’s recycling and clean waste programs. The Town shall encourage recycling and waste reduction efforts for residents, schools and in public and private development projects.	<b>Consistent.</b> The proposed project would comply with the Town’s requirement to prepare a plan addressing the recycling and reuse of all demolition and waste construction materials. Additionally, the project would participate in all recycling and clean waste programs as administered by the South Bayside Waste Management Authority.
<b>Circulation Element</b>	
<b>Circulation Objective 2.221.</b> To preserve the streets of Atherton as scenic routes.	<b>Consistent.</b> See response to Land Use Goal 1.210 and Land Use Objective 1.223.
<b>Circulation Policy 2.421.</b> All streets and highways in the Town of Atherton shall be preserved as scenic routes.	<b>Consistent.</b> See response to Land Use Goal 1.210 and Land Use Objective 1.223.
<b>Circulation Policy 2.425.</b> On-street and visible off-street parking of vehicles and other means of transportation shall be carefully controlled.	<b>Consistent.</b> No parking is proposed as part of the project.
<b>Open Space and Conservation Element</b>	
<b>Open Space and Conservation Goal 4.210.</b> To protect both publicly and privately held lands from deterioration of their rural charm, scenic value and environmental equilibrium.	<b>Consistent.</b> See response to Land Use Goal 1.210 and Land Use Objective 1.223.
<b>Open Space and Conservation Policy 4.232.</b> The Town shall endeavor to protect scenic resources, significant stands of natural vegetation, wildlife habitat, public safety and significant archaeological resources, both publicly and privately held.	<b>Consistent.</b> See response to Land Use Goal 1.210 and Land Use Objective 1.223. Additionally, measures would be incorporated into the proposed project, including pre-construction surveys and soil sampling, and demolition plans that would protect resources and public safety.

**Table 4.10-1  
Town of Atherton General Plan Land Use Policy Consistency**

Applicable Goal / Policy	Consistency Issue(s)
<b>Open Space and Conservation Policy 4.233.</b> The Town seeks to preserve the open space characteristics of existing public and private schools, churches, the Circus Club, the California Water Service property and the public parks.	<b>Consistent.</b> See response to Land Use Goal 1.210, Land Use Objective 1.223, and Open Space and Conservation Goal 4.210.
<b>Open Space and Conservation Action Program 4.310.</b> Trees shall be preserved wherever possible. This policy shall be explicitly considered during the subdivision process.	<b>Consistent.</b> See response to Land Use Goal 1.210, Land Use Objective 1.223, and Open Space and Conservation Goal 4.210.
<b>Open Space and Conservation Action Program 4.320.</b> Minimum lot sizes, setback restrictions, height limitations and sign regulations shall be employed to accomplish open space and conservation objectives.	<b>Consistent.</b> The proposed project would comply with all setback restrictions, height limitations, and sign regulations.
<i>Safety Element</i>	
<b>Safety Policy 6.310.</b> The Town recognizes the potential danger to public safety that may result from natural or man made causes and seeks to minimize the public risks in such hazards.	<b>Consistent.</b> The Practice Gym would be required to comply with all California Building Code requirements for schools and institutional facilities. Additionally, measures would be incorporated into the proposed project to protect public safety, including soil sampling and the preparation of demolition plans that would minimize public risks.
<b>Safety Policy 6.320.</b> The emergency evacuation routes established in this General Plan Element are El Camino Real, Middlefield Road, Marsh Road, Alameda de las Pulgas, and Valparaiso Avenue.	<b>Consistent.</b> The proposed project does not propose any changes to Valparaiso Avenue and would not interfere with any emergency evacuation routes established in this General Plan Element.
<b>Safety Policy 6.330.</b> Minimum road widths and clearances around structures shall be in accordance with generally recognized minimums consistent with fire protection.	<b>Consistent.</b> The proposed project would comply with all setback restrictions. Additionally, the Practice Gym plans would be reviewed by the Town Engineer and Fire Department for compliance with established code requirements consistent with the fire protection and the ability to be served for fire protection.
<b>Safety Policy 6.360.</b> Public education, research and information dissemination on seismic hazards and emergency response shall be encouraged.	<b>Consistent.</b> SHS implements an Emergency Response Plan that addresses seismic hazards and emergency response actions.

**c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?**

As noted in the 2010 EIR, there are no applicable habitat conservation plans or natural community conservation plan with jurisdiction in the area of the proposed project. Since the proposed project would be located within the existing campus boundaries, the project would not result in conflicts with any habitat conservation plan beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### **4.11. MINERAL RESOURCES**

This section evaluates the potential mineral resource impacts of amending the 2009 Master Plan to include the proposed project.

#### **4.11.1. PRIOR ANALYSIS AND CONCLUSIONS**

##### **4.11.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have no impacts related to mineral resources. The campus is not designated by the State or the Town of Atherton General Plan as an area of mineral resource.<sup>36</sup> Therefore, the Master Plan would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State. Furthermore, as the site is currently developed, the Master Plan would not alter its status with respect to the availability of mineral resources.

##### **4.11.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.11.2. EXISTING CONDITIONS**

The proposed project would be located on a developed site on the existing Sacred Heart Schools campus, surrounded by a single-family neighborhood. The site is in the Town of Atherton, which is developed primarily with residential neighborhoods and schools. The Town does not contain any major industrial land uses or mineral quarries. There are known mineral deposits in other parts of San Mateo County but not within the Town.<sup>37</sup>

#### **4.11.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following mineral resources criteria.

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<sup>36</sup> *Town of Atherton, Town of Atherton General Plan, November 20, 2002.*

<sup>37</sup> *San Mateo County, San Mateo County General Plan, Chapter 3: Mineral Resources, 1986.*

## Environmental Checklist

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Result in the 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 on a local general plan, specific plan, or other land use plan?				✓

**a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?**

As noted in the 2010 EIR, the campus is not designated by the State or the Town of Atherton General Plan as an area of mineral resource.<sup>38</sup> According to the San Mateo County General Plan, the County does contain oil fields and stone quarries that are considered “significant mineral resources,” but these deposits are not located on or near the project site.<sup>39</sup> The proposed project site is thus not designated as a known area of mineral resource. Moreover, since the site is currently developed as a school, the proposed project would not alter its status with respect to the availability of mineral resources in the future. Therefore, the proposed project would not result in any impacts related to mineral resources beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?**

As noted in the 2010 EIR, the campus is not designated by the State or the Town of Atherton General Plan as an area of mineral resource.<sup>40</sup> According to the San Mateo County General Plan, the County does contain oil fields and stone quarries that are considered “significant mineral resources,” but these deposits are not located on or near the project site.<sup>41</sup> The proposed project site is thus not designated as a locally-important area of mineral resource. Therefore, the proposed project would not result in any impacts related to mineral resources beyond those described in the 2010 EIR.

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<sup>38</sup> *Town of Atherton, Town of Atherton General Plan, November 20, 2002.*

<sup>39</sup> *San Mateo County, San Mateo County General Plan, Chapter 3: Mineral Resources, 1986.*

<sup>40</sup> *Town of Atherton, Town of Atherton General Plan, November 20, 2002.*

<sup>41</sup> *San Mateo County, San Mateo County General Plan, Chapter 3: Mineral Resources, 1986.*

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### 4.12. NOISE

This section evaluates the potential noise impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.12.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.12.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the 2009 Master Plan would have less than significant impacts related to established noise standards, ambient noise levels, or excessive groundborne vibration:

**Impact NOISE-2: Implementation of the 2009 Master Plan would not result in exposure of persons to or generation of noise in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.**

**Traffic Noise at New Classrooms.** The Community Noise Equivalent Level (CNEL) was measured at a maximum of 51 decibels (dBA) at the new classroom buildings at the St. Josephs Campus, below the CNEL limit of 55 dBA specified for schools and libraries in the Town's General Plan Noise Ordinance.<sup>42</sup>

**HVAC Noise at Existing Homes.** The new buildings at the St. Josephs Campus would have roof mounted HVAC (heating ventilation and air-conditioning) equipment such as exhaust fans and outdoor condensers. The mechanical system noise levels were calculated to be 46 dBA at the nearest residential property line, below the Town's Noise Ordinance standard of 60 dBA during the daytime and 50 dBA at night.<sup>43</sup>

**Athletic Field Noise at Existing Homes.** The Noise Ordinance specifies that if the ambient noise level equals or exceeds the sound level limit then the limit is to be adjusted to the ambient level plus 5 dBA. Since vehicles on the adjacent roadways generate maximum noise levels of 75 dBA, the sound level limit was adjusted to 80 dBA. It was expected that maximum noise levels from sources such as voices, whistles and bats would be up to 73 dBA at the residences across the

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<sup>42</sup> *Town of Atherton, Town of Atherton Zoning Code Chapter 8.16 Noise Control, 2009.*

<sup>43</sup> *Ibid.*

roadways. Although these noise levels would be clearly audible at the residential properties, they would not exceed the 80 dBA limit.<sup>44</sup>

**Impact NOISE-3: Implementation of the 2009 Master Plan would not cause a substantial permanent increase in ambient noise levels in the vicinity above levels without the 2009 Master Plan.**

The major noise sources associated with the daily operation of the school include vehicular traffic, voices of the students outdoors, and stationary noise sources such as HVAC equipment. In general, the 2009 Master Plan would not change the use and noise patterns of the school. The greatest potential for a noticeable noise increase was due to sports fields being moved closer to homes, to a minimum of 165 feet. The increase in noise contribution from the realigned athletic fields was calculated and found to be less than the threshold for significant increase.

**Impact NOISE-4: Implementation of the 2009 Master Plan would not result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.**

The new campus buildings would have spread footings so no pile driving would be used. Demolition and construction activities would occur at distances of over 100 feet from the nearest residences and groundborne vibration levels would be a maximum of 69 VdB, less than the 80 VdB threshold of significance. Vibration levels could reach 83 VdB when equipment is within about 35 feet of the existing buildings, but this vibration level would occur for very limited times.

The 2010 EIR concluded that the 2009 Master Plan would have significant impacts related to construction noise:

**Impact NOISE-1: Implementation of the 2009 Master Plan would result in construction noise that would result in a substantial temporary or periodic increase in ambient noise levels in the vicinity above levels existing without the 2009 Master Plan.**

Construction activities would involve demolition, excavation, grading, and facilities development. Some of the equipment that would be used during construction would include excavators, backhoes, graders, dump trucks, loaders, compactors, dozers, pavers, pneumatic tools, concrete trucks, cranes, bulldozers and other heavy machinery. Most machinery used in the construction of the Master Plan would produce maximum noise levels of up to 85 dBA at a distance of 50 feet. There would be very limited use of impact tools such as jackhammers and hoe rams which can generate noise levels of up to 90 dBA at 50 feet. No pile driving would be expected to occur. The noisier activities would generally occur during the demolition, grading and foundation phases of construction. After the exterior walls of the buildings have been erected, the noise levels would be significantly lessened as most activities would occur indoors. Construction would occur from 8 a.m. to 5 p.m. Monday through Friday. Demolition would last about four weeks and the construction would take 15 to 18 months.

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<sup>44</sup> *Ibid.*

Construction noise levels were calculated for the various noise sensitive buildings based on heavy construction activity that generates a noise level of 85 dBA at 50 feet with an adjustment for the distance between the construction activity and the nearest noise sensitive buildings. Construction noise levels across Elena Avenue and Valparaiso would be comparable to typical vehicle passbys on local roads. Construction noise levels at residences across Emilie and Park Avenues would be comparable to the loudest existing vehicle passbys as measured at these residential property lines. Similar to existing loud vehicle passbys, construction noise levels would occasionally be loud enough to interfere with speech communication outdoors at residential yards closest to the Master Plan site. However, this impact was considered less than significant since construction would be temporary and would conform to the Town's Noise Ordinance.

Although the construction noise impact on surrounding residences would be less than significant, impacts from construction noise on classrooms would be significant. The American National Standards Institute (ANSI) suggests that intrusive noises in classrooms should not exceed 40 dBA for more than 10 percent of any given hour.<sup>45</sup> Similarly the State of California Streets and Highways Code Section 216 has a recommended interior hourly  $L_{eq}$  of 52 dBA for schools near highways which is less restrictive than the ANSI standard.<sup>46</sup> Construction noise levels would be expected to interfere with school activities when the outdoor noise level is above 67 dBA when the windows are open and 77 dBA when the windows are closed. Assuming construction equipment generates a noise level of 85 dBA at 50 feet, a level of 67 dBA would be reached when the equipment is within 400 feet of the classrooms and a level of 77 dBA when the equipment is within 125 feet of the classrooms. Demolition and construction activities would take place within these distances from occupied classrooms.

#### 4.12.1.2. 2010 EIR Mitigation Measures

For the potentially significant impact related to construction noise, the 2010 EIR identified the following mitigation measure to reduce impacts to a less than significant level:

**Mitigation Measure NOISE-1.** In order to reduce noise impacts, the following mitigation measures shall be implemented:

- Notify neighboring residences of the schedule for heavy construction activities (such as demolition, grading and foundations).
- To the extent practical, schedule the noisiest phases of construction (demolition, grading and foundations) during periods when students will not be occupying the closest classrooms to the construction areas (e.g. summer and seasonal breaks).

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<sup>45</sup> *acoustics.com*, "Summary of ANSI Standard S12.60-2002: Acoustical Performance Criteria, Design Requirements and Guidelines for Schools." [http://www.acoustics.com/ansi\\_education.asp](http://www.acoustics.com/ansi_education.asp)

<sup>46</sup> *California Streets and Highways Code Section 216*. <http://law.onecle.com/california/streets/216.html>

- If it is not practical to schedule the heavy construction and demolition activities during summer months, work with the Town to evaluate the acceptability of working on some weekends, particularly for noisy activities that will occur close to classrooms. At these locations, equipment will be relatively far from homes and the noise would be further reduced by the acoustical shielding provided by the classroom buildings.
- To the extent feasible, erect 8-foot tall continuous plywood barriers between the occupied school classrooms and the heavy construction activities.
- Schedule construction, as feasible, so that the new structures can be partially finished for use as a noise buffer.
- Ensure that mufflers in good condition are installed on internal combustion engine-equipment;
- Locate stationary equipment such as generators and compressors away from nearby sensitive land uses (i.e., residences and classrooms).
- Perform noisy procedures at an off-site location, as practicable.
- Designate a site noise disturbance coordinator whose name will be prominently displayed in signage on the site. The coordinator will be responsible to address neighborhood and school concerns regarding noise and take appropriate actions, where feasible, to reduce noise levels.

**4.12.2. EXISTING CONDITIONS**

The proposed project site is in use as a private open-air basketball court available for use by students during favorable weather. Noise sources on site include voices of students, ball dribbling and balls making contact with the basketball hoops. The project site is approximately 200 feet from the nearest residences, across Elena Avenue.

**4.12.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following noise criteria.

<b>Would the project result in:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✓	

## Environmental Checklist

Would the project result in:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			✓	
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			✓	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		✓		
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 public use airport, would the project expose people residing or working in the project area to excessive noise levels?				✓
f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				✓

**a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**

The 2010 EIR found that the 2009 Master Plan would not result in generation of noise levels in excess of standards established in the Town’s General Plan Noise Ordinance for classrooms and residences.

The proposed project is an indoor Practice Gym, which would be used for basketball and volleyball activities that currently occur outdoors. The new Practice Gym building would also have HVAC equipment such as exhaust fans and outdoor condensers sized commensurate with the size of the building. These HVAC systems would be smaller than those on the adjacent Homer Science Building and would be specified to be at least as quiet as the Homer Science Building system. No new activities are proposed at the Practice Gym and no new traffic would be generated.

The Practice Gym would be located approximately 200 feet from the nearest residences. The type of equipment used for the ventilation of the Practice Gym would be similar to ventilation equipment used on other buildings on the campus and would be required to operate below the Town’s Noise Ordinance standard of 60 dBA during the daytime and 50 dBA at night.

Similarly, athletic activity noise from the new Practice Gym building would be reduced from the noise currently occurring on the open air courts now on the project site and would be equal to or less than the maximum 73 dBA sports field noise levels found in the 2010 EIR, below the 80 dBA limit. The project would not generate additional traffic; therefore, there would be no increase in traffic-generated noise or

parking lot noise. Therefore, the proposed project would not result in any impacts related to noise level standards beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?**

The 2010 EIR found that groundborne vibration levels from demolition and construction that would generally occur at distances of over 100 feet would be 69 VdB, less than the 80 VdB threshold of significance for construction.

Demolition and construction activities on the proposed project site would occur at distances of approximately 200 feet from the nearest residences. Construction methods and equipment would be similar, albeit smaller due to the smaller size of the Practice Gym, than those used for the Lower/Middle School buildings. Therefore, groundborne vibration levels at nearby residences would be less than what was analyzed to occur for the Lower/Middle School construction. Therefore, the proposed project would not result in any impacts related to excessive groundborne vibration beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?**

As described in the 2010 EIR, the major noise sources associated with the daily operation of the school include vehicular traffic, voices of the students outdoors, and stationary noise sources such as HVAC equipment. In general, the 2009 Master Plan would not alter the major noise sources associated with the daily operation of the school.

The proposed project would house activities currently occurring outdoors and would likely decrease permanent ambient noise coming by enclosing the courts and thus muffling noise that was previously not muffled due to the open-air nature of the courts. Therefore, the proposed project would not result in any impacts related to permanent ambient noise levels beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?**

The 2010 EIR found that construction of the Lower/Middle School campus buildings as part of the 2009 Master Plan would not significantly increase ambient noise levels at nearby residences, but would significantly increase noise levels in school classrooms. Machinery would produce noise levels up to 85 dBA at a distance of 50 feet, with limited use of impact tools such as jackhammers and hoe rams that generate noise levels of up to 90 dBA at 50 feet. The noisier activities would generally occur during the demolition, grading and foundation phases of construction. After exterior walls of the Master Plan buildings have been erected, noise levels would be significantly lessened as most activities would occur indoors.

The same would be true of construction of the proposed project. Construction activities would involve demolition, excavation, grading, and construction of a new Practice Gym, detention basin, and emergency vehicle pad. This construction would require some similar types of construction equipment described in the Master Plan, albeit on a smaller scale as the proposed project is a much smaller facility. Construction would occur from 8 a.m. to 5 p.m. Monday through Friday, and would last approximately 6 to 7 months from May 2013 to December 2013. Noise intensity decreases at a rate of about 6 dBA per doubling of distance. Since the closest residences to the proposed project site are approximately 200 feet away, the heaviest construction noise levels would be only 73 dBA at these residences, compared to 85 dBA at 50 feet as described above. This noise level would be below the 80 dBA threshold specified in the Town's Noise Ordinance. Similar to the Master Plan, this construction noise would be less than significant for residential neighbors.

Although the construction noise impact on surrounding residences would be less than significant, impacts from construction noise on classrooms could be significant. The demolition, grading and foundation phases of construction would take place during summer months and thus would not interfere with classroom learning. However, the later stages of construction would be conducted during Fall 2013 while school is in session. As described in the 2010 EIR, construction noise levels would interfere with school activities when the outdoor noise level is above 67 dBA with the windows open and 77 dBA with the windows closed. Since the Homer Science Center and Sigall building are located close to the proposed project site, it is likely that construction noise levels would exceed these thresholds at times. Implementation of 2010 EIR Mitigation Measure NOISE-1 would mitigate this potential impact. Therefore, the proposed project would not result in any impacts related to temporary ambient noise levels beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** Less Than Significant With Mitigation

**2010 Mitigation:** Mitigation Measure NOISE-1

**2012 Mitigation:** Mitigation Measure NOISE-1

**Significance After Implementation:** Less Than Significant (No New Impact)

- 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 public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

As described in the 2010 EIR and summarized in Section 4.8: Hazards, the closest public airport to the SHS campus is the San Carlos Airport, over 2 miles away. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in noise hazards for people residing or working on campus beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

- f. For a project located within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?**

As described in the 2010 EIR and summarized in Section 4.8: Hazards, the campus is not located within the vicinity of a private airstrip. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in noise hazards for people residing or working on campus beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### **4.13. POPULATION AND HOUSING**

This section evaluates the potential population and housing impacts of amending the 2009 Master Plan to include the proposed project.

#### **4.13.1. PRIOR ANALYSIS AND CONCLUSIONS**

##### **4.13.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have no impacts related to population and housing. The Master Plan would not necessitate the removal of existing housing or displacement of anyone from their homes, nor would it involve the construction of any new housing. The Master Plan would include an increase in student enrollment which could result in the addition of several instructors employed on the campus, but these few instructors would not significantly impact the local population even if they all decided to move to Atherton. In addition, it is not likely that construction workers would relocate their place of residence as a consequence of working on the Master Plan. Therefore, no substantial population growth related to employment would be induced.

##### **4.13.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.13.2. EXISTING CONDITIONS**

The proposed project would be within the existing Sacred Heart Schools campus. The campus is a day school and no students live on campus. As noted in the Project Description, there is some housing on campus for nuns, but this housing is not located near the proposed project site. The school is located in a single-family neighborhood in the Town of Atherton, which had a population of 7,200 in 2010. The Town is characterized primarily by single-family neighborhoods and schools, and does not contain any major commercial or industrial land use.

#### **4.13.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following population and housing criteria.

## Environmental Checklist

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				✓
b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				✓

**a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

The 2010 EIR found that the 2009 Master Plan could result in the employment of a few new instructors due to increased student enrollment, but this would not significantly impact local population growth. The proposed project would not further increase enrollment and thus would not result in any further hiring. In addition, construction workers not relocate their place of residence during construction of this small project. Therefore, the proposed project would not result in any impacts related to population growth beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere?**

The 2010 EIR found that the 2009 Master Plan would not displace any housing during or after construction, since, with the exception of a small group of nuns, no housing is located on the site. Likewise, the proposed project would involve development within the existing campus and would not result in displacement of existing housing. Therefore, the proposed project would not result in any impacts related to displacement beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?**

The 2010 EIR found that the 2009 Master Plan would not displace substantial numbers of people and would not require the replacement of housing elsewhere. Likewise, the proposed project would involve development within the existing campus and would not result in displacement of existing housing. Therefore, the proposed project would not result in any impacts related to displacement beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

#### **4.14. PUBLIC SERVICES**

This section evaluates the potential public services impacts of amending the 2009 Master Plan to include the proposed project.

##### **4.14.1. PRIOR ANALYSIS AND CONCLUSIONS**

###### **4.14.1.1. 2010 EIR Impact Findings Summary**

The 2010 EIR concluded that the 2009 Master Plan would have less than significant impacts on public services:

**The 2009 Master Plan would not result in a substantial adverse physical impact associated with the provision of fire services and the need for new or physically altered fire facilities.**

Implementation of the 2009 Master Plan would result in the construction of replacement campus facilities and buildings and would not increase the number of structures on the campus. All 2009 Master Plan structures would be designed and inspected for compliance with California Building Code requirements for public school facilities regarding fire suppression. Therefore, the Master Plan would not substantially increase demand for fire protection services.

**The 2009 Master Plan would not result in a substantial adverse physical impact associated with the provision of police services and the need for new or physically altered police facilities.**

The campus is served by the Atherton Police Department. Additionally, SHS maintains its own security on-site. All proposed building and site plans would be reviewed by the Atherton Police Department to ensure that the plans comply with emergency procedures and would not create safety hazards. Additionally, the Master Plan would not include substantial employment or population growth, and therefore would not substantially increase demand for police services.

**The 2009 Master Plan would not result in a substantial adverse physical impact associated with the provision of school services and the need for new or physically altered school facilities.**

The Master Plan is an expansion of existing private school services. The Plan would not include substantial employment or population growth, which could generate demand for other elementary, middle, or high school facilities that exceeds the capacity of the school district(s) responsible for serving the Town.

**The 2009 Master Plan would not include substantial employment or population growth that generates a demand for park or recreational facilities, which would require the construction of new parks or result in non-attainment of goals related to the provision of parklands.**

Although the Master Plan would increase the number of students and employees on the campus, it would not directly increase the number of residents in the area. Students attending classes on campus would likely only use school recreational facilities and would not be expected to use any Town of Atherton recreational facilities unless they are already residents of the Town.

**The 2009 Master Plan would not generate a demand for other public facilities (such as libraries) that exceeds the available capacities.**

The Plan does not include any residential uses that could directly increase population within the surrounding area, thereby increasing the demands for library services.

#### **4.14.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

#### **4.14.2. EXISTING CONDITIONS**

The proposed project site is currently developed as an open-air basketball court, pedestrian walkways, detention basin and surrounding landscaping on a private school campus. This site is served by the Menlo Park Fire District, the Town of Atherton Police Department and Sacred Heart Schools campus security.

The Town of Atherton includes eight public schools and three private schools (including the Sacred Heart Schools). The Town also contains one public library and three public parks.<sup>47</sup>

**4.14.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following public services criteria.

<p>a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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:</p> <p>Fire Protection?</p> <p>Police Protection?</p> <p>Schools?</p> <p>Parks?</p> <p>Other public facilities?</p>		<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
				✓	
					✓
					✓
					✓
					✓

**a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 public services?**

The 2010 EIR found that while the Master Plan would increase enrollment, the added number of students and instructors would not significantly impact service ratios, response times, or other performance objectives for public services.

The proposed project would not further increase student enrollment or the number of campus visitors; therefore, the project would not lead to an increased need for fire, police, school, library or park facilities. Moreover, the new Practice Gym building would be designed and inspected by the Menlo Park Fire Protection District for compliance with California Building Code requirements for public school facilities regarding fire suppression. Building and site plans would also be reviewed by the Atherton Police Department for compliance with emergency procedures and minimization of safety hazards. Therefore, the proposed project would not result in any impacts related to public services beyond those described in the 2010 EIR.

<sup>47</sup> *Town of Atherton, Town of Atherton Zoning Code and Town of Atherton Zoning Map, October 21, 2009.*

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### 4.15. RECREATION

This section evaluates the potential recreation impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.15.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.15.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the Master Plan would have less than significant impacts on recreation:

**The 2009 Master Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated.**

The Master Plan would increase the number of students and employees on the campus. However, it is unlikely that students and employees would use any parks in the Town when similar facilities are already available on campus. Therefore, use and maintenance of park facilities would not significantly increase.

**The 2009 Master Plan would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.**

The Master Plan proposes the relocation and improvement of existing private recreational sports fields on site. These facilities would be for use by SHS students and guest teams only. Overall, the proposed recreational facility improvements would serve to enhance the existing campus recreational facilities, but are not anticipated to attract substantial numbers of new users or spectators to campus.

##### 4.15.1.2. 2010 EIR Mitigation Measures

No mitigation measures were recommended.

#### 4.15.2. EXISTING CONDITIONS

The proposed project site is currently an open-air basketball court available for use by students and guests. The site is located on a school campus with multiple other recreational facilities, including the McGanney Sports Center, Dunlevie Aquatic Center, tennis courts, a field house, baseball field, soccer

field, football field, all-weather track and additional practice fields. Since the Sacred Heart Schools campus is privately owned, campus recreational facilities are not available to the public.

**4.15.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following recreation criteria.

	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities 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?				✓

**a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?**

As noted in the 2010 EIR, the Master Plan would increase school enrollment but new students and instructors would use campus recreational facilities and therefore would not increase the use or maintenance of public recreational facilities.

The proposed project would not further increase enrollment and would not result in more campus visitors that could potentially use Town parks. Therefore, the proposed project would not result in any impacts related to maintenance of public recreational facilities beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**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?**

The 2010 EIR found that on-site recreational improvements proposed as part of the Master Plan would replace existing facilities and would not result in the construction or expansion of public recreation facilities.

The proposed project would entail replacing the existing open-air basketball courts with a new building housing indoor basketball and volleyball facilities. As with all recreational facilities on campus, this building would be open for use by SHS students and guest teams as the site is a private school and not open for public use. Overall, the proposed recreational facility improvement would serve to enhance the existing recreational facilities at the site, but would not attract new users or visitors. Therefore, the proposed project would not result in any impacts related to maintenance of public recreational facilities beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### 4.16. TRANSPORTATION/TRAFFIC

This section evaluates the potential transportation impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.16.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.16.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the Master Plan would have no impacts on air traffic patterns:

**Impact TRAF-11: The 2009 Master Plan would not result in a change in air traffic pattern.**

The closest public airport (San Carlos) is located approximately 5.25 miles from the campus, and the campus is not located near any private airstrips.

The 2010 EIR concluded that the Master Plan would have less than significant impacts on hazards due to a design feature, inadequate emergency access, and conflicts with adopted plans and policies:

**Impact TRAF-8: The 2009 Master Plan would not substantially increase hazards due to a design feature.**

The Master Plan would shift driveway access for drop-off of Grades 4 to 8 students from Emilie Avenue to Park Lane. A new drop off/pick up area for Grades 4 to 8 students would be provided in the proposed parking lot. This new drop-off area would be accessed using the existing two-way Park Lane driveway, and providing a new “outbound-only” driveway on Park Lane, 550 feet west of Emilie Avenue and 200 feet from the existing Park Lane two-way driveway. This distance would be sufficient to allow unobstructed turning movements from the Park Lane outbound driveway, even during periods with maximum eastbound vehicle queues along Park Lane. Access for drop-off of preschool/kindergarten and Grades 1 to 3 students would be maintained along Emilie Avenue using the one-way inbound and one-way outbound driveways closest to

Valparaiso Avenue; the existing two-way driveway along Emilie Avenue near MacBain Avenue would be eliminated, which would improve conditions by reducing traffic turning movements along Emilie Avenue.

**Impact TRAF-9: The 2009 Master Plan would not result in inadequate emergency access.**

Emergency access on the SHS campus is currently sufficient and none of the proposed parking lot or roadway changes would eliminate existing emergency access. The campus would be accessible for emergency vehicles from both the proposed Park Lane parking lot and existing Emilie Avenue parking area. Additionally, extension of the parking area along Elena Avenue would facilitate emergency access to the sports fields in that part of the campus.

**Impact TRAF-10: The 2009 Master Plan would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.**

Transit and pedestrian facilities would not be changed due to the Master Plan, and bicycle facilities would be improved as follows: there would be two new bicycle accesses added from Park Lane- one at the corner of Park Lane and Elena Avenue, and the other along the fire lane near Park Lane and Emilie Avenue.

The 2010 EIR concluded that potentially significant impacts related to intersection level of service (LOS) during Master Plan construction and operation could be reduced to less than significant levels:

**Impact TRAF-1: 2014 Intersection Level of Service Impacts**

The Master Plan would increase LOS to unacceptable levels at the following intersections:

- 1A. Valparaiso Avenue/Emilie Avenue
- 1B. Valparaiso Avenue/Elena Avenue
- 1C. Valparaiso Avenue/Johnson Street

**Impact TRAF-2: 2014 Intersection Signal Warrant Impacts**

The Master Plan would increase peak hour volumes at the following unsignalized intersections, where Base Case volumes would already be exceeding peak hour signal warrant criteria levels:

- 2A. Valparaiso Avenue/Emilie Avenue
- 2B. Valparaiso Avenue/Elena Avenue

**Impact TRAF-3: 2014 Local Road Impacts**

The following local roadway segments would receive a significant impact due to the addition of traffic from the Master Plan:

- 3A. Emilie Avenue – North of Park Lane
- 3B. Elena Avenue – North of Valparaiso Avenue

- 3C. Elena Avenue – North of Park Lane
- 3D. Park Lane – Between Emilie & Elena Avenues
- 3E. Park Lane – West of Elena Avenue

### **Impact TRAF-4: 2030 Intersection Level of Service Impacts**

The following intersections would receive a significant impact due to traffic from the Master Plan:

- 4A. Valparaiso Avenue/Emilie Avenue
- 4B. Valparaiso Avenue/Elena Avenue
- 4C. Park Lane/Elena Avenue
- 4D. Valparaiso Avenue/Johnson Street

### **Impact TRAF-5: 2030 Intersection Signal Warrant Impacts**

The following intersections would receive a significant impact due to traffic from the Master Plan:

- 5A. Valparaiso Avenue/Emilie Avenue
- 5B. Valparaiso Avenue/Elena Avenue

### **Impact TRAF- 6: 2030 Local Road Impacts**

The following local roadway segments would receive a significant impact due to the addition of traffic from the 2009 Master Plan.

- 6A. Emilie Avenue – North of Park Lane
- 6B. Elena Avenue – North of Valparaiso Avenue
- 6C. Elena Avenue – North of Park Lane
- 6D. Park Lane – Between Emilie & Elena Avenues
- 6E. Park Lane – West of Elena Avenue

### **Impact TRAF-7: Construction Traffic Impacts**

Master Plan activities would require additional traffic associated with demolition of some existing buildings, off haul trips, provision and removal of 25 portable classrooms and construction of 4 new buildings, new on-site parking and new on-site driveways. Construction would take place from 8:00 AM to 5:00 PM Monday to Friday. Demolition would take 4 weeks and construction would take 15 to 18 months. About 725 to 775 truck trips would take place over the course of construction. Truck traffic and construction worker access to campus would be from Valparaiso Avenue, Elena Avenue and Park Lane. All construction traffic parking would be on campus.

Construction worker traffic would not significantly impact delay for local or school-related traffic on Elena or Emilie avenues or on Park Lane during the school drop off or pickup time periods. However, trucks arriving and departing the campus during peak parent traffic activity times could result in significantly increased delays at the Valparaiso Avenue/Elena Avenue intersection, particularly for turns from Elena Avenue. Trucks leaving the campus could also impact delays for traffic during the evening commute period starting at 4:00 PM. In addition, Truck traffic could result in pavement degradation along Park Lane and Elena Avenue.

### **Secondary Impacts Due to Signalization of the Valparaiso Avenue/Elena Avenue Intersection**

Signalization of the Valparaiso Avenue/Elena Avenue intersection would provide quicker access from Elena Avenue to Valparaiso Avenue during peak traffic periods, resulting in the following rerouting of traffic:

- **Sacred Heart Schools.** High school drivers traveling north of the school on local streets may decide to use Valparaiso Avenue to access El Camino Real (to travel north). Grade 4-8 drivers accessing Park Lane and using Emilie Avenue to turn left to eastbound Valparaiso Avenue may choose to use the Elena Avenue signal. Grade 4-8 drivers accessing Park Lane using Emilie Avenue and Elena Avenue to travel north of the school on local streets may decide to use Valparaiso Avenue to access El Camino Real (to travel north).
- **Local Area Traffic.** Local drivers accessing Valparaiso Avenue via Emilie Avenue, Santiago Avenue or Park Lane would reroute to the Elena Avenue signal, resulting in more traffic on Elena Avenue (from Park Lane to Valparaiso Avenue), on Valparaiso Avenue (traveling eastbound from Elena Avenue to El Camino Real) and more traffic on northbound El Camino Real. Reductions in traffic will occur on Emilie Avenue north of Valparaiso Avenue as well as on Elena Avenue north of Park Lane.

### **2030 Secondary Impacts**

Signalization of the Valparaiso Avenue/Elena Avenue intersection, the added traffic along Valparaiso Avenue would result in secondary significant level of service/delay impacts at the following locations:

- Valparaiso Avenue/Johnson Street: AM & mid afternoon peak hours
- Valparaiso Avenue/Arbor Road: AM & mid afternoon peak hours
- Valparaiso Avenue/San Mateo Drive: AM & mid afternoon peak hours

#### **4.16.1.2. 2010 EIR Mitigation Measures**

For the potentially significant impact related to LOS during construction and operation, the 2010 EIR identified the following mitigation measure to reduce impacts to a less than significant level:

**Mitigation Measure TRAF-1A** (Valparaiso Avenue/Emilie Avenue LOS and Delay Impact):

- **Alternative A:** Add a second lane on the Emilie Avenue stop sign controlled intersection approach. Stripe the approach for one left and one right turn lane.
- **Alternative B:** Add a left turn deceleration lane on the eastbound Valparaiso Avenue intersection approach as well as a refuge area in the Valparaiso Avenue median just east of the intersection to assist left turns from Emilie Avenue. Extend the refuge area  $\pm$  130 feet to Johnson Street to assist left turns from this street to Valparaiso Avenue.
- **Alternative C:** Combine Alternatives A & B.

**Mitigation Measure TRAF-1B:** (Valparaiso Avenue/Elena Avenue LOS and Delay Impact):

- **Alternative A:** Add a second lane on the Elena Avenue intersection approach. Stripe the approach for one left and one right turn lane.
- **Alternative B:** Add a left turn deceleration lane on the eastbound Valparaiso Avenue intersection approach as well as a refuge area in the Valparaiso Avenue median just east of the intersection to assist left turns from Elena Avenue.
- **Alternative C:** Combine Alternatives A & B.
- **Alternative D:** Signalize the intersection and provide a left turn deceleration lane on the eastbound Valparaiso Avenue intersection approach.

**Mitigation Measure TRAF-1C:** (Valparaiso Avenue/Johnson Street LOS and Delay Impact)

- **Alternative A:** Widen the Johnson Street intersection approach to provide room for a right-turning vehicle to separate from a left-turning vehicle.
- **Alternative B:** Add a refuge area in the median of Valparaiso Avenue just west of the intersection to assist left turns from Johnson Street.

**Mitigation Measure TRAF-2B:** (Valparaiso Avenue/Elena Avenue Signal Warrant Impact).

Mitigation Measure 1B is the recommended mitigation. (Alternative A or B or a combination of A&B if remaining unsignalized and Alternative D if signalized.)

- **Alternative A:** Add a second lane on the Elena Avenue intersection approach.
- **Alternative B:** Add a left turn deceleration lane on the eastbound Valparaiso Avenue approach as well as a refuge area in the median of Valparaiso Avenue just east of the intersection to assist left turns from Elena Avenue.
- **Alternative C:** Combine Alternatives A & B.
- **Alternative D:** Signalize and add a left turn deceleration lane on the Valparaiso Avenue eastbound approach.

**Mitigation Measures TRAF-3A to 3C:** (Emilie Avenue and Elena Avenue Local Street Impacts).

The Town of Atherton has directed that no widening be considered for either Elena Avenue or Emilie Avenue. However, they have also directed that intersection improvements along each roadway that would reduce delay and improve level of service would be considered adequate mitigation for any project volume increases along local streets where Base Case daily volumes would already be greater than 1,000 vehicles.

Mitigation Measures 1A and 1B (Valparaiso Avenue/Emilie Avenue and Valparaiso Avenue/Elena Avenue intersections) would provide acceptable mitigation for Project traffic impacts to Emilie Avenue and Elena Avenue.

**Mitigation Measures TRAF-3D & 3E** (Park Lane Local Street Impacts)

The Town of Atherton has directed based upon General Plan Circulation Element direction that no widening be considered for Park Lane. However, improvements to Park Lane intersections would be acceptable mitigation.

Add a second lane to the southbound Elena Avenue approach to the Park Lane all-way stop intersection.

**Mitigation Measure TRAF-4A:** (Valparaiso Avenue/Emilie Avenue LOS and Delay Impact)

- **Alternative A:** Add a second lane on the Emilie Avenue stop sign controlled approach. Stripe the approach for one left and one right turn lane.
- **Alternative B:** Add a left turn deceleration lane on the Valparaiso Avenue eastbound intersection approach as well as a refuge area in the Valparaiso Avenue median just east of the intersection to assist left turns from Emilie Avenue. Extend the refuge area  $\pm$  130 feet to Johnson Street to assist left turns from the street to Valparaiso Avenue.
- **Alternative C:** Combine Alternatives A & B.

**Mitigation Measure TRAF-4B** (Valparaiso Avenue/Elena Avenue LOS & Delay Impact)

- **Alternative A.** Add a second lane on the Elena Avenue stop sign controlled approach. Stripe the approach for one left and one right turn lane.
- **Alternative B.** Add a left turn deceleration lane on the Valparaiso Avenue eastbound intersection approach as well as a refuge area in the Valparaiso Avenue median just east of the intersection to assist left turns from Elena Avenue.
- **Alternative C.** Combine Alternatives A & B.
- **Alternative D.** Signalize the intersection and provide a left turn deceleration lane on the eastbound Valparaiso Avenue intersection approach.

### **Mitigation Measure TRAF-4C (Valparaiso Avenue/Johnson Street LOS & Delay Impact)**

- **Alternative A.** Widen the Johnson Street intersection approach to provide room for a right-turning vehicle to separate from a left-turning vehicle.
- **Alternative B.** Add a refuge area in the median of Valparaiso Avenue just west of the intersection to assist left turns from Johnson Street.

### **Mitigation Measure TRAF-5B (Valparaiso Avenue/Elena Avenue Signal Warrant Impact)**

Mitigation Measure 4B is the recommended mitigation. (Alternative A or B or a combination of A&B if remaining unsignalized and Alternative D if signalized.)

- **Alternative A:** Add a second lane on the Elena Avenue intersection approach.
- **Alternative B:** Add a left turn deceleration lane on the eastbound Valparaiso Avenue approach as well as a refuge area in the median of Valparaiso Avenue just east of the intersection to assist left turns from Elena Avenue.
- **Alternative C:** Combine Alternative A & B.
- **Alternative D:** Signalize and add a left turn deceleration lane on the eastbound Valparaiso Avenue approach.

### **Mitigation Measure TRAF-6A to 6C (Emilie Avenue/Elena Avenue Impacts)**

The Town of Atherton has directed that no widening be considered for either Elena Avenue or Emilie Avenue. However, they have also directed that intersection improvements along each roadway that would reduce delay and improve level of service would be considered adequate mitigation for any Project volume increases along local streets where Base Case daily volumes would already be greater than 1,000 vehicles.

Mitigation Measures 4A and 4B (Valparaiso Avenue/Emilie Avenue and Valparaiso /Elena Avenue intersections) would provide acceptable mitigation for Project traffic impacts to Emilie Avenue and Elena Avenue.

### **Mitigation Measure TRAF-6D to 6E (Park Lane Local Street Impacts)**

The Town of Atherton has directed that no widening be considered for Park Lane. However, improvements to Park Lane intersections would be acceptable mitigation.

Add a second lane to the southbound Elena Avenue approach to the Park Lane all-way stop intersection.

### **Mitigation Measure TRAF-7: Construction Traffic Impacts**

The applicant shall develop and get approval from the Town of Atherton Public Works Department for a construction/demolition traffic management plan before inception of any work.

Project truck traffic or oversize vehicle activity shall be limited to the hours between 8:30 AM and 3:00 PM.

The Town of Atherton Public Works Department and the school shall document pavement conditions on Park Lane and Elena Avenue before and after the Project. The applicant shall be responsible for repair of any pavement degradation due to Project truck activity.

### Secondary Mitigations

- **Valparaiso Avenue/Johnson Street:** Widen the Johnson Street approach to provide enough room for right- and left-turning vehicles to separate.
- **Valparaiso Avenue/Arbor Road:** Widen the Arbor Road approach to provide enough room for right- and left-turning vehicles to separate.
- **Valparaiso Avenue/San Mateo Drive:** Widen the San Mateo Drive approach to provide enough room for right- and left-turning vehicles to separate.
- **Valparaiso Avenue/Johnson Street:** Widen the Johnson Street approach to provide enough room for right- and left-turning vehicles to separate.
- **Valparaiso Avenue/Arbor Road:** Widen the Arbor Road approach to provide enough room for right- and left-turning vehicles to separate.
- **Valparaiso Avenue/San Mateo Drive:** Widen the San Mateo Drive approach to provide enough room for right- and left-turning vehicles to separate.

### 4.16.2. EXISTING CONDITIONS

The proposed project site is an open-air basketball court between the Homer Science Building and Morey Field. There is a private school parking lot next to the basketball court that is accessible from Elena Avenue. As described in the 2010 EIR, Elena Avenue is a two-lane north-south street extending between Valparaiso Avenue and Atherton Avenue. It is lined by the campus and by residential uses. The posted speed limit is 25 miles per hour. Elena Avenue is classified as a “local street” in the Town of Atherton. The nearest intersection to the project site, Elena Avenue and Park Lane, is classified in the 2010 EIR as level of service (LOS) C during morning peak hours and LOS B during afternoon peak hours. These are acceptable LOS levels according to the City of Menlo Park Transportation Impact Analysis Guidelines.<sup>48</sup>

### 4.16.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT

The environmental significance of the proposed project was evaluated based on the following transportation criteria.

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<sup>48</sup> *City of Menlo Park, Transportation Impact Analysis Guidelines.*

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?		✓		
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?		✓		
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				✓
d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✓
e. Result in inadequate emergency access?			✓	
f. Result in inadequate parking capacity?				✓
g. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			✓	

**a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system?**

**b. Would the project conflict with an applicable congestion management program?**

The 2010 EIR found that the Master Plan would conflict with LOS thresholds and other requirements at multiple intersections, and the 2010 EIR proposed mitigation measures to address all significant impacts at these intersections.

The proposed project would not result in additional student enrollment or additional activities that would result in new visitors to campus; therefore, there would be no changes or impacts to local traffic during operation. During construction, there would be some added traffic due to construction truck haul trips. However, any added congestion created as a result of this truck traffic would be mitigated with 2010 EIR Mitigation Measure TRAF-7. Construction staging would occur in the Elena Avenue parking lot and would not cause delays on Elena Avenue. Therefore, the proposed project would not result in any impacts

related to an applicable plan, ordinance or policy establishing performance standards for the circulation system beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant With Mitigation

**2012 Impact:** Less Than Significant With Mitigation

**2010 Mitigation:** Mitigation Measures TRAF-1 through TRAF-7

**2012 Mitigation:** Mitigation Measure TRAF-7

**Significance After Implementation:** Less Than Significant (No New Impact)

**c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?**

The 2010 EIR found that the closest public airport is 5.25 miles from campus, and the campus is not located near any private airstrips. Since the proposed project would be located within the existing campus boundaries, the proposed project would not result in any impacts related to air traffic patterns beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The 2010 EIR found that the Master Plan would shift campus driveway access, but this shift would not significantly impact turning movements from roadways. The proposed project would not include changes to driveway access to the campus. Therefore, the proposed project would not result in any impacts related to hazards due to a design feature or incompatible uses beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**e. Would the project result in inadequate emergency access?**

The 2010 EIR found that the Master Plan would not change existing campus emergency access, so impacts on emergency access would be less than significant. The proposed project would actually improve emergency access by adding a new emergency vehicle parking pad in front of the Homer Science Building to accommodate fire trucks entering from the front of the Main Building, as required by the MPFD. Therefore, the proposed project would not result in any impacts related to inadequate emergency access beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**f. Would the project result in inadequate parking capacity?**

The 2010 EIR found that the Master Plan would not result in inadequate parking capacity, as all parking would be supplied on campus. The new Practice Gym would not result in additional student enrollment of visitors to campus, so additional parking would not be required as part of this project. Some on-campus parking would be inaccessible during construction due to construction staging on the Elena Avenue parking lot, but this impact would be temporary and would occur mainly during the summer months when school is not in session. Therefore, the proposed project would not result in any impacts related to inadequate parking capacity beyond those described in the 2010 EIR.

**2010 Impact:** No Impact

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**g. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?**

The 2010 EIR found that transit and pedestrian facilities would not be changed due to the project, and bicycle facilities would be improved. The proposed project would widen an existing pedestrian pathway to accommodate parking for emergency vehicles. This would not affect pedestrian use of this path. Therefore, the proposed project would not result in any impacts related to transit, bicycle or pedestrian plans or programs beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

### 4.17. UTILITIES/SERVICE SYSTEMS

This section evaluates the potential utility/service systems impacts of amending the 2009 Master Plan to include the proposed project.

#### 4.17.1. PRIOR ANALYSIS AND CONCLUSIONS

##### 4.17.1.1. 2010 EIR Impact Findings Summary

The 2010 EIR concluded that the Master Plan would not have significant impacts on utilities.

**The 2009 Master Plan would not exceed wastewater treatment requirements of the Regional Water Quality Control Board.**

The San Francisco Regional Water Quality Control Board (SFRWQCB) enforces wastewater treatment and discharge requirements in the area. The campus is not served by a private on-site wastewater treatment system, but instead conveys wastewater via municipal sewage infrastructure maintained by the South Bayside System Authority. The South Bayside Wastewater Treatment Facility is a public facility, and is therefore subject to the State's wastewater treatment requirements. Wastewater from the Master Plan site is therefore treated according to the wastewater treatment requirements enforced by the SFRWQCB.

**The 2009 Master Plan would not result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.**

The Master Plan would involve an increase of 114 students on the campus, resulting in an increase in the demand for water consumption and wastewater generation. The campus is served for water supply by the California Water Service Company (CalWater). According to CalWater, no new water treatment facilities would be needed to adequately treat water supply to serve the increase in students on the campus.<sup>49</sup> The campus is served for wastewater treatment by the South Bayside System Authority (SBSA), which at the time of the 2010 EIR was four months away from completing a comprehensive Conveyance System Master Plan (CSMP) for increased plant flow to meet projected growth in the region.<sup>50</sup> The additional wastewater generation created by the 2009 Master Plan would minimally impact the CSMP, and the South Bayside Wastewater Treatment Facility would easily have capacity to treat wastewater for the Master Plan without needing to construct additional new or expanded wastewater facilities.

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<sup>49</sup> Personal communication with Larry Mathias, CalWater, on January 22, 2010.

<sup>50</sup> Personal communication with Dan Child, Manager, South Bayside System Authority, on January 25, 2010.

**The 2009 Master Plan site would not result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect.**

The campus currently has stormwater drainage from an upstream area that would be routed around the Lower/Middle School Campus in a new stormdrain pipeline. This rerouting would follow construction best management practices as part of the larger 2009 Master Plan Storm Water Pollution Prevention Plan (SWPPP). The Master Plan would result in the construction of new impervious surfaces on the site, but runoff would not exceed pre-construction volume and there would be no need for expansion of any drainage facilities.

**The 2009 Master Plan would have sufficient water supplies available to serve the campus from existing entitlements and resources, or are new or expanded entitlements needed.**

The Master Plan would involve in an increase of 114 students on the campus, resulting in an increase in the demand for water supply on the campus. As noted above, according to CalWater there would be adequate water supply to serve the increase in students on the campus and no new or expanded entitlements would be required.<sup>51</sup>

**The 2009 Master Plan would not result in a determination by the wastewater treatment provider which serves or may serve the campus that it has adequate capacity to serve the Master Plan's projected demand in addition to the provider's existing commitments.**

The Master Plan would involve in an increase of 114 students on the campus, resulting in an increase in wastewater generation. As noted above, at the time of the 2010 EIR the SBSA was about four months away from completing a comprehensive Conveyance System Master Plan (CSMP) to meet projected regional growth, and the South Bayside Wastewater Treatment Facility would have capacity to treat the Master Plan's projected demand in addition to the provider's existing commitments.

**The 2009 Master Plan would be served by a landfill with sufficient permitted capacity to accommodate the Master Plan's solid waste disposal needs.**

The Master Plan would require the demolition of existing buildings on the site and would involve an incremental increase in solid waste during operation due to increased student enrollment. As of 2006, the Town had a diversion rate of 67 percent. Solid waste from the Town is taken by Republic Services to Ox Mountain Landfill, which has a permitted maximum disposal of 3,598 tons per day. As of 2000, the landfill had exceeded its permitted capacity of 37.9 million cubic yards by approximately 6.7 million cubic yards (17.8 percent). However, the closure date was planned for 2018. While the Ox Mountain landfill is currently in excess of its permitted capacity, waste continues to be accepted as the landfill gradually settles and new space becomes available.

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<sup>51</sup> Personal communication with Larry Mathias, CalWater, on January 22, 2010.

Thus, the increase in solid waste generated under the Master Plan would be sufficiently served by the Ox Mountain Landfill.<sup>52</sup>

**The 2009 Master Plan would comply with federal, state, and local statutes and regulations related to solid waste.**

The Master Plan would require the demolition of existing buildings on the site and the generation of solid waste during operation. SHS is required to comply with the Town of Atherton Ordinance 15.52, which requires that every structure planned for demolition shall be made available for deconstruction, salvage and recovery prior to demolition. In addition, SHS implements an on-campus recycling program for paper, aluminum, and plastics. All solid waste generated on-site would be required to be disposed of in accordance with all applicable federal and State regulations related to solid waste. Demolition waste from the Master Plan would be separated during demolition and trucked to certified recyclers for recycling and would not impact the Ox Mountain Landfill.<sup>53</sup>

**4.17.1.2. 2010 EIR Mitigation Measures**

No mitigation measures were recommended.

**4.17.2. EXISTING CONDITIONS**

The proposed project site is currently an open-air basketball court, paved walkway, detention basin and surrounding landscaping. The site is not served by water, wastewater or solid waste services. The existing detention basin facilitates on-site stormwater infiltration from surrounding impervious surfaces.

**4.17.3. SIGNIFICANCE CRITERIA AND IMPACT ASSESSMENT**

The environmental significance of the proposed project was evaluated based on the following utilities and service system criteria.

<b>Would the project:</b>	<b>Potentially Significant Impact</b>	<b>Less Than Significant With Mitigation Incorporated</b>	<b>Less Than Significant Impact</b>	<b>No Impact</b>
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?				✓
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				✓

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<sup>52</sup> Personal communication with David Zeiger, Republic Services, January 22, 2010.

<sup>53</sup> Personal communication with Andrea Rodriguez, Republic Services, February 2, 2010.

## Environmental Checklist

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			✓	
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				✓
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✓
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			✓	
g. Comply with federal, state, and local statutes and regulations related to solid waste?			✓	

**a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

The 2010 EIR found that since the campus is served by the South Bayside System Authority, a public facility, the Master Plan is therefore subject to State wastewater treatment requirements and is treated according to the treatment requirements enforced by the SFRWQCB.

The proposed project would not include any water using facilities and thus would not require connection to any wastewater treatment system. Therefore, the proposed project would not result in any impacts related to wastewater treatment requirements beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The 2010 EIR found that the increased student enrollment associated with the 2009 Master Plan would not require or result in new water or wastewater treatment facilities.

The proposed project would not result in an increase in the number of students on the campus, so no new water or wastewater treatment facilities would be required. Therefore, the proposed project would not result in any impacts related to wastewater treatment requirements beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The 2010 EIR found that while impervious surface area would increase as a result of the 2009 Master Plan, post-construction stormwater runoff volume would not exceed the pre-construction volume, so there would be no environmental effects. Additionally, storm drain rerouting would be subject to construction BMPs as part of the Master Plan SWPPP.

Similarly, the proposed project would result in new impervious surfaces on the site, since the new Practice Gym and emergency vehicle parking pad would be larger in area than the existing basketball court and pedestrian walkway. However, additional runoff would be treated on-site by the expanded detention basin, so there would be no need for expansion of any drainage facilities. Therefore, the proposed project would not result in any impacts related to stormwater drainage facilities beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

The 2010 EIR found that the 2009 Master Plan would not result in the need for expanded water entitlements. The proposed project would not result in an increase in the number of students on the campus and would not include water uses other than irrigation. Therefore, the project would be served from existing entitlements and there would be no impacts related to water entitlements beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

- e. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

As described in the 2010 EIR, the Master Plan would not result in a significant impact on SBSA's capacity to treat wastewater, as SBSA was undergoing a CSMP at the time that would involve adding capacity to meet future demand. The proposed project would not generate wastewater and there would be no impacts related to wastewater capacity beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** No Impact

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

- f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

The 2010 EIR found that the Master Plan would be served by the Ox Mountain Landfill, which would have sufficient capacity to accommodate the Master Plan through its anticipated close date in 2018.

The proposed project would require the demolition of an existing open-air basketball court and pedestrian walkway, and construction of the new Practice Gym and emergency vehicle parking pad. Per Town of Atherton Ordinance 15.52, the project would separate construction and demolition waste and truck this waste to certified recyclers for recycling. As a result, the proposed project would not impact the Ox Mountain Landfill during construction. Moreover, the project would not result in an increase in the number of students on campus and therefore would not result in increased in solid waste generated on the site during operation. Therefore, the proposed project would not result in any impacts related to solid waste beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

- g. Would the project comply with federal, State, and local statutes and regulations related to solid waste?**

The 2010 EIR found that construction and operation of the Master Plan would be consistent with Town of Atherton Ordinance 15.52, which requires that all projects to separate construction and demolition waste and truck this waste to certified recyclers for recycling. As a result, the proposed project would not impact the Ox Mountain Landfill during construction.

Similarly, the proposed project would recycle all construction waste and would implement the school-wide recycling program for paper, aluminum, and plastics. Solid waste generated on site would be disposed of in accordance with all applicable federal and State solid waste regulations. Therefore, the proposed project would not result in any impacts related to solid waste beyond those described in the 2010 EIR.

**2010 Impact:** Less Than Significant

**2012 Impact:** Less Than Significant

**2010 Mitigation:** No Mitigation Required

**2012 Mitigation:** No Mitigation Required

**4.18. MANDATORY FINDINGS OF SIGNIFICANCE**

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to 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 wildlife community, reduce the number or restrict the range of an endangered, rare or threatened plant or wildlife, 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 that would cause substantial adverse effects on human beings, either directly or indirectly?		✓		

**a. Does the project have the potential to 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 wildlife community, reduce the number or restrict the range of an endangered, rare or threatened plant or wildlife, or eliminate important examples of the major periods of California history or prehistory?**

As described in this Initial Study, implementation of the proposed project would not have the potential to adversely impact biological resources due to the developed nature of the site and surroundings. In order to reduce potential impacts to nesting birds, mitigation measure BIO-1 would be implemented prior to and

during tree removal. There are no known cultural resources present on the proposed project site, but in the event that cultural resources are uncovered during construction, mitigation measures CUL-1 and CUL-2 would be implemented. Therefore, the proposed project would not damage biological resources 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)?**

The impacts of the proposed project are individually limited and not cumulatively considerable. All environmental impacts that could occur as a result of short-term construction of the proposed project would be reduced to a less than significant level through implementation of the mitigation measures recommended in this Initial Study, and when viewed in conjunction with other closely related past, present or reasonably foreseeable future projects, would not be significant. Long-term operation of the proposed project would not result in any significant impacts.

**c. Does the project have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?**

As described in this Initial Study, implementation of the proposed project could result in air quality, biological resources, cultural resources, noise or transportation impacts. Implementation of the mitigation measures recommended in this IS/MND would ensure that the proposed project would result in no environmental effects that would cause substantial direct or indirect adverse effects on human beings.

### 5.0 REPORT PREPARATION

#### 5.1 REFERENCES

##### Documents and Websites

- acoustics.com. 2012. Summary of ANSI S12.60-2002, “Acoustical Performance Criteria, Design Requirements and Guidelines for Schools.” Available online at: [http://www.acoustics.com/ansi\\_education.asp](http://www.acoustics.com/ansi_education.asp). Accessed December 21, 2012.
- Association of Bay Area Governments (ABAG), 2003. *Dam Failure Inundation Hazard Map for Menlo Park/Atherton/East Palo Alto*. Available online at: <http://www.abag.ca.gov/cgi-bin/pickdamx.pl>. Accessed December 21, 2012.
- ABAG. 2011. *Earthquakes and Hazards Program*. Available online at: <http://quake.abag.ca.gov/>. Accessed December 20, 2012.
- AST Geotechnical and Environmental Consulting Engineers. *Geotechnical Study/Soil and Foundation Investigation, Proposed Improvements at Saint Joseph School, Library and Class Room Buildings, One and Two-Story Above-Grade Structures, 50 Emilie Street, Atherton, California*. March 2009.
- Bagg Engineers, Soils Testing for St. Joseph’s School Site, Sacred Heart Schools, Atherton, California.
- Bay Area Air Quality Management District (BAAQMD). 2010. *Bay Area 2010 Clean Air Plan*. Available online at: <http://www.baaqmd.gov/Divisions/Planning-and-Research/Plans/Clean-Air-Plans.aspx>. Accessed November 2011.
- Bay Area Air Quality Management District (BAAQMD). 2011a. *California Environmental Quality Act Air Quality Guidelines*. June 2010, updated May 2011. Available online at: <http://www.baaqmd.gov/~media/Files/Planning%20and%20Research/CEQA/BAAQMD%20CEQA%20Guidelines%20May%202011.ashx?la=en>. Accessed September 2011.
- Bear Gulch Reservoir. Available online at: <http://lakelocate.com/california/bear-gulch-reservoir>. Accessed December 21, 2012.
- California Air Pollution Control Officers Association (CAPCOA). 2008. *CEQA & Climate Change*. January 2008. Accessed September 2011.
- California Department of Conservation. 1974. *State of California Special Studies Zones: Pal Alto Quadrangle*. Available online at: <http://gmw.consrv.ca.gov/shmp/download/ap/pdf/PALOALTO.PDF>. Accessed December 20, 2012.
- California Department of Conservation. 2009. *San Mateo County Williamson Act Lands 2006/2007*. Available online at: [ftp://ftp.consrv.ca.gov/pub/DlRp/WA/sanmateo\\_06\\_07\\_WA.pdf](ftp://ftp.consrv.ca.gov/pub/DlRp/WA/sanmateo_06_07_WA.pdf). Accessed December 17, 2011.

- California Department of Conservation, Division of Land Resource Protection. 2010. *San Mateo County Important Farmland 2010*. Available online at: <ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/smt10.pdf>, Accessed December 17, 2012.
- California Department of Forestry and Fire Protection. 2003. *Wildland Urban Interface -Fire Threatened Communities Map*. Available online at: [http://www.co.sanmateo.ca.us/vgn/images/portal/cit\\_609/29/16/601017851firethreat\\_wui.pdf](http://www.co.sanmateo.ca.us/vgn/images/portal/cit_609/29/16/601017851firethreat_wui.pdf). Accessed December 21, 2012.
- California Department of Transportation (Caltrans). 2007. *California Scenic Highway Mapping System: San Mateo County*. Available online at: [http://www.dot.ca.gov/hq/LandArch/scenic\\_highways/index.htm](http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm). Accessed December 17, 2012.
- California Environmental Protection Agency (CalEPA) and California Air Resources Board (CARB). April 2005. *Air Quality and Land Use Handbook: A Community Health Perspective*. Available online at: <http://www.arb.ca.gov/ch/handbook.pdf>. Accessed December 17, 2012.
- California Geologic Survey (CGS).2009. *Alameda County Tsunami Inundation Maps: Palo Alto Quadrangle*. Available online at: [http://www.conservation.ca.gov/cgs/geologic\\_hazards/Tsunami/Inundation\\_Maps/SanMateo/Documents/Tsunami\\_Inundation\\_RedwoodPointPaloAlto\\_Quads\\_SanMateo.pdf](http://www.conservation.ca.gov/cgs/geologic_hazards/Tsunami/Inundation_Maps/SanMateo/Documents/Tsunami_Inundation_RedwoodPointPaloAlto_Quads_SanMateo.pdf). Accessed November 2011.
- California Native Plant Society (CNPS), Inventory of Rare and Endangered Vascular Plants of California. Available online at: <http://www.rareplants.cnps.org/>. Accessed December 17, 2012.
- California Natural Diversity Database (CNDDB). Available online at: [http://www.dfg.ca.gov/biogeodata/cnddb/plants\\_and\\_animals.asp](http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp). Accessed December 17, 2012.
- California Office of Public Resources (OPR). 2010. *Appendix G of the State CEQA Guidelines*.
- California State Legislature. California Streets and Highways Code Section 216. Available online at: <http://law.onecle.com/california/streets/216.html>. Accessed December 21, 2012.
- California State Legislature. *Fish & Game Code § 3500-3516*. Available online at: <http://www.leginfo.ca.gov/cgi-bin/displaycode?section=fgc&group=03001-04000&file=3500-3516>. Accessed December 21, 2012.
- City of Menlo Park. Transportation Impact Analysis Guidelines. Available online at: [http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CD8QFjAA&url=http%3A%2F%2Fwww.menlopark.org%2Fdepartments%2Ftrn%2Ftrn\\_tiag.pdf&ei=7SLWUMG8Coa09gSB7YD4BQ&usg=AFQjCNEO6\\_jOZfv5EntDgIXmM4qPm0g91g&bvm=bv.1355534169,d.eWU](http://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=0CD8QFjAA&url=http%3A%2F%2Fwww.menlopark.org%2Fdepartments%2Ftrn%2Ftrn_tiag.pdf&ei=7SLWUMG8Coa09gSB7YD4BQ&usg=AFQjCNEO6_jOZfv5EntDgIXmM4qPm0g91g&bvm=bv.1355534169,d.eWU). Accessed December 21, 2012.
- Department of Toxic Substances Control, EnviroStor. 2012. *Selection for "94027"*. Available online at: <http://www.envirostor.dtsc.ca.gov/public/>. Accessed December 21, 2012.

Holbrook Palmer Park. Available online at: <http://holbrookpalmerpark.com/facilities.html>. Accessed December 21, 2012.

McClenahan Consulting, *SHS Basketball Court Project Arborists Report, February 9, 2012*

Menlo Circus Club. Available online at:

<http://www.menlocircusclub.com/Default.aspx?p=DynamicModule&pageid=340505&ssid=240615&vnf=1>. Accessed December 21, 2012.

Page & Turnbull, *Regarding the Historic Status of the Sacred Heart Main Building*, Memorandum, September 9, 2008.

Sacred Heart Schools Tree Reports, McClenahan Consulting, LLC , August 2008 and November 2009.

San Mateo County. 1986. *San Mateo County General Plan, Chapter 3: Mineral Resources*. Available online at:

[http://www.co.sanmateo.ca.us/planning/genplan/pdf/gp/GP%20Ch%2003\\_Minerals.pdf](http://www.co.sanmateo.ca.us/planning/genplan/pdf/gp/GP%20Ch%2003_Minerals.pdf). Accessed December 21, 2012.

Schaaf & Wheeler. Hydrology of St. Joseph's School Project, February 10, 2010.

Town of Atherton. November 20, 2002. *Town of Atherton General Plan*. Available online at:

<http://www.ci.atherton.ca.us/documents/ViewtheAthertonGeneralPlanPartI.pdf> and <http://www.ci.atherton.ca.us/documents/ViewtheAthertonGeneralPlanPartII.pdf>. Accessed December 17, 2012.

Town of Atherton. October 21, 2009. *Town of Atherton Zoning Code*. Available online at:

<http://www.codepublishing.com/CA/atherton.html>. Accessed December 17, 2012.

Town of Atherton. *Town of Atherton Zoning Map*. Available online at:

[http://www.ci.atherton.ca.us/documents/Zoning24x36\\_001.pdf](http://www.ci.atherton.ca.us/documents/Zoning24x36_001.pdf). Accessed December 17, 2012.

Town of Atherton. August 18, 2010. *Town of Atherton Housing Element Update*. Available Online at:

<http://www.ci.atherton.ca.us/documents/ViewTheAthertonHousingElementUpdate2007-2014.pdf>. Accessed December 17, 2012.

U.S. Congress. 1972. Clean Water Act (CWA).

**5.2. REPORT PREPARERS**

**Environmental Analysis and Document Preparation:**

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**Appendix A**  
**Sacred Heart Schools Practice Gym Arborists Report**

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# ARBORIST REPORT

Submitted To:

**Sacred Heart Schools  
150 Valparaiso Avenue  
Atherton, CA 94027**

Project Location:

**Sacred Heart Schools  
Basketball Court Project**

Submitted By:

**McCLENAHAN CONSULTING, LLC  
John H. McClenahan  
ISA Board Certified Master Arborist, WE-1476B  
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February 9, 2012  
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February 9, 2012

### **Sacred Heart Schools**

Attention: **Ms. Sandy Dubinsky**

150 Valparaiso Avenue

Atherton, CA 94027

RE: **Sacred Heart Schools  
Basketball Court Project**

### **Assignment**

As requested, I performed a visual inspection of trees to determine species, size and condition. Impacts from proposed basketball court improvements and general tree preservation guidelines for trees to remain.

### **Background**

These trees are in the vicinity of the new Homer building and new practice fields. The existing basketball court was installed during the Homer construction. This is the second round of development proposed around these trees in the last 5 years.

### **Summary**

The project will require removal of 10<sup>\*</sup> trees greater than 15.2 inches in diameter. Typically these trees are protected by city ordinance depending on setbacks. Extra caution should be used designing around the Blue Atlas cedar as it will be sensitive to root cutting. The trees in this report were included in a 2007 report to prepare for the construction of the Homer Building. Of the 6 remaining trees two of the oaks, 31 and 32, may be impacted by the rear of the building and utility excavation. A preconstruction meeting with arborist is recommended along with monitoring of any grading or excavation proposed within tree drip lines.

*\* There may  
be one  
more.*

### **Methodology**

No root crown exploration, climbing or plant tissue analysis was performed as part of this survey.

In determining Tree Condition several factors have been considered which include:

- Rate of growth over several seasons;
- Structural decays or weaknesses;
- Presence of disease or insects; and
- Life expectancy.

The following guide for interpretation of Tree Condition as related to Life Expectancy is submitted for your information.

0 - 5 Years	=	Poor
5 - 10 Years	=	Poor to Fair
10 - 15 Years	=	Fair
15 - 20 Years	=	Fair to Good
20 + Years	=	Good

**Tree Description/Observation**

**5: Aleppo pine (*Pinus halepensis*)**

**Diameter:** 27.5"

**Height:** 65' **Spread:** 45'

**Condition:** Fair

**Location:** East of rain garden

**Observation:** Foliar canopy exhibits a moderate accumulation of deadwood. Scaffold limbs exhibit weak wood attachments and are susceptible to failure. Tree grows to a southwest lean. Any excavation within the *Tree Protection Zone (TPZ)* of 14-feet must be accomplished by hand digging. A qualified arborist must supervise any cutting of roots greater than one inch in diameter. Proposed rain garden expansion will encroach 11-feet from the trunk. New impacts will occur to less than 20 percent of root environment.

**6: Eucalyptus spp**

**Diameter:** 16.6"

**Height:** 45' **Spread:** 30'

**Condition:** Fair

**Location:** East of rain garden

**Observation:** Foliage is typical of the species with a moderate accumulation of interior deadwood. Codominant leaders at 15-feet create an inherent structural defect. The *TPZ* is 9-feet. Proposed rain garden addition is outside the *TPZ* and should not impact more than 15 percent of the root environment.

**17: Blue atlas cedar (*Cedrus atlantica 'glauca'*)**

**Diameter:** 53.7"

**Height:** 85' **Spread:** 45'

**Condition:** Fair to Good

**Location:** South of practice field

**Observation:** Foliage is typical of the species. Bifurcation at 5-feet creates an inherent structural defect. The *TPZ* is 23-feet. I recommend moving sidewalks and any utility excavation at least 20 feet from the trunk. Any excavation within the *TPZ* of 23-feet must be accomplished by hand digging. A qualified arborist must supervise any cutting of roots greater than one inch in diameter. Further review of utility plan and grading and drainage is necessary to determine actual impacts.

**18: London Plane (*Platanus x acerifolia*)**

**Diameter:** 22.5"

**Height:** 50' **Spread:** 30'

**Condition:** Fair to Good

**Location:** South of practice field

**Observation:** Crown is one sided. Competes with cedar. **Proposed for removal.**

**19: London Plane**

**Diameter:** 19.1"

**Height:** 60' **Spread:** 30'

**Condition:** Fair

**Location:** Homer basketball court

**Observation:** Dormant at time of inspection. Scaffold limbs exhibit narrow attachments.

**Proposed for removal.**

**20: London plane tree**

**Diameter:** 17.4"

**Height:** 50' **Spread:** 25'

**Condition:** Fair

**Location:** Homer basketball court

**Observation:** Dormant at time of inspection. Scaffold limbs exhibit narrow attachments.

**Proposed for removal.**

**21: London plane tree**

**Diameter:** 26.2"

**Height:** 60' **Spread:** 45'

**Condition:** Fair

**Location:** Homer basketball court

**Observation:** Dormant at time of inspection. Scaffold limbs exhibit narrow attachments.

**Proposed for removal.**

**22 London plane tree**

**Diameter:** 27.2"

**Height:** 70' **Spread:** 35'

**Condition:** Fair

**Location:** Homer basketball court

**Observation:** Dormant at time of inspection. **Proposed for removal.**

**23: Monterey pine (*Pinus radiata*)**

**Diameter:** 42.0"

**Height:** 60' **Spread:** 50'

**Condition:** Poor to Fair

**Location:** Homer basketball court

**Observation:** Foliar canopy exhibits a minor accumulation of deadwood. Scaffold limbs exhibit weak attachments at 35-feet. Mechanical injury to roots. **Proposed for removal.**

**24: London plane**

**Diameter:** 17.4"

**Height:** 50' **Spread:** 25'

**Condition:** Poor to Fair

**Location:** Homer basketball court

**Observation:** Branch dieback observed in previous inspection. **Proposed for removal.**

**Sacred Heart Schools**

Attention: **Ms. Sandy Dubinsky**

Page 4

**25: Silver maple (*Acer saccharinum*)**

**Diameter:** 31.2"

**Height:** 50' **Spread:** 40'

**Condition:** Poor to Fair

**Location:** Homer basketball court

**Observation:** Nutrient deficiencies observed in prior inspection. Bifurcation at 4-1/2-feet creates an inherent structural defect. **Proposed for removal.**

**26: Silver maple**

**Diameter:** 20.1"

**Height:** 50' **Spread:** 40'

**Condition:** Fair

**Location:** Homer basketball court

**Observation:** Foliar canopy exhibits a minor accumulation of deadwood. Bifurcation at 4-1/2-feet creates an inherent structural defect. **Proposed for removal.**

**27: Silver maple**

**Diameter:** 19.7"

**Height:** 45' **Spread:** 30'

**Condition:** Poor to Fair

**Location:** Homer basketball court

**Observation:** Foliar canopy is one sided and exhibits some deadwood. **Proposed for removal.**

**30: Valley oak (*Quercus lobata*)**

**Diameter:** 24.5"

**Height:** 40' **Spread:** 45'

**Condition:** Fair to Good

**Location:** Homer basketball court and practice field

**Observation:** Dormant at time of inspection. Grows to a southeast lean. Scaffold limbs exhibit narrow scaffold limb attachments. The *TPZ* is 11-feet. Recommend pruning to reduce endweight. Recommend no further improvements within *TPZ*.

**31: Coast live oak (*Quercus agrifolia*)**

**Diameter:** 18.1" Low Branching

**Height:** 38' **Spread:** 18'

**Condition:** Fair

**Location:** 12 feet from sidewalk to Homer

**Observation:** Foliar canopy exhibits dieback of low limbs. Bifurcation at 3-feet creates an inherent structural defect. The *TPZ* is 14-feet. Not on plan. Impacts currently unknown.

**32: Coast live oak**

**Diameter:** 19.8"

**Height:** 38' **Spread:** 30'

**Condition:** Fair

**Location:** Beyond sidewalk to Homer

**Observation:** Foliar canopy exhibits dieback of low limbs. Bifurcation at 3-feet creates an inherent structural defect. Vertical crack observed below bifurcation. Leans toward sidewalk. The *TPZ* 9-feet. Recommend crown reduction pruning.

## **TREE PRESERVATION GUIDELINES**

### **Tree Preservation and Protection Plan**

In providing recommendations for tree preservation, we recognize that injury to trees as a result of construction include mechanical injuries to trunks, roots and branches, and injury as a result of changes that occur in the growing environment.

To minimize these injuries, we recommend grading operations encroach no closer than five times the trunk diameter, (i.e. 30" diameter tree x 5=150" distance). At this distance, buttress/anchoring roots would be preserved and minimal injury to the functional root area would be anticipated. Should encroachment within the area become necessary, hand digging is **mandatory**.

### **Barricades**

Prior to initiation of construction activity, temporary barricades should be installed around all trees in the construction area. Six-foot high, chain link fences are to be mounted on steel posts, driven 2 feet into the ground, at no more than 10-foot spacing. The fences shall enclose the entire area under the drip line of the trees or as close to the drip line area as practical. These barricades will be placed around individual trees and/or groups of trees as the existing environment dictates.

The temporary barricades will serve to protect trunks, roots and branches from mechanical injuries, will inhibit stockpiling of construction materials or debris within the sensitive 'drip line' areas and will prevent soil compaction from increased vehicular/pedestrian traffic. No storage of material, topsoil, vehicles or equipment shall be permitted within the tree enclosure area. The ground around the tree canopy shall not be altered. These barricades should remain in place until final inspection of the building permit, except for work specifically required in the approved plans to be done under the trees to be protected. Designated areas beyond the drip lines of any trees should be provided for construction materials and onsite parking.

### **Root Pruning (if necessary)**

During and upon completion of any trenching/grading operation within a tree's drip line, should any roots greater than one inch (1") in diameter be damaged, broken or severed, root pruning to include flush cutting and sealing of exposed roots should be accomplished under the supervision of a qualified Arborist to minimize root deterioration beyond the soil line **within twenty-four (24) hours**.

### **Pruning**

Pruning of the foliar canopies to include removal of deadwood is recommended and should be initiated prior to construction operations. Such pruning will provide any necessary construction clearance, will lessen the likelihood or potential for limb breakage, reduce 'windsail' effect and provide an environment suitable for healthy and vigorous growth.

**Fertilization**

A program of fertilization by means of deep root soil injection is recommended with applications in spring and summer for those trees to be impacted by construction.

Such fertilization will serve to stimulate feeder root development, offset shock/stress as related to construction and/or environmental factors, encourage vigor, alleviate soil compaction and compensate for any encroachment of natural feeding root areas.

Inception of this fertilizing program is recommended prior to the initiation of construction activity.

**Irrigation**

A supplemental irrigation program is recommended for the cedar and pine trees and should be accomplished at regular three to four week intervals during the period of May 1<sup>st</sup> through October 31<sup>st</sup>. Irrigation is to be applied at or about the 'drip line' in an amount sufficient to supply approximately fifteen (15) gallons of water for each inch in trunk diameter.

Irrigation can be provided by means of a soil needle, 'soaker' or permeable hose. When using 'soaker' or permeable hoses, water is to be run at low pressure, avoiding runoff/puddling, allowing the needed moisture to penetrate the soil to feeder root depths.

**Mulch**

Mulching with wood chips (maximum depth 3") within tree environments (outer foliar perimeter) will lessen moisture evaporation from soil, protect and encourage adventitious roots and minimize possible soil compaction.

**Inspection**

Periodic inspections by the **Site Arborist** are recommended during construction activities, particularly as trees are impacted by trenching/grading operations.

Inspections at approximate four (4) week intervals would be sufficient to assess and monitor the effectiveness of the Tree Preservation Plan and to provide recommendations for any additional care or treatment.

All written material appearing herein constitutes original and unpublished work of the Arborist and may not be duplicated, used or disclosed without written consent of the Arborist.

Should you have any questions, or if we may be of further assistance in these concerns, kindly contact our office at any time.

Very truly yours,

**McCLENAHAN CONSULTING, LLC**



By: **John H. McClenahan**  
ISA Board Certified Master Arborist, WE-1476B  
member, American Society of Consulting Arborists

JHMc: pm



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### ARBORIST DISCLOSURE STATEMENT

Arborists are tree specialists who use their education, knowledge, training and experience to examine trees, recommend measures to enhance the beauty and health of trees, and attempt to reduce the risk of living near trees. Clients may choose to accept or disregard the recommendations of the arborist, or seek additional advice.

Arborists cannot detect every condition that could possibly lead to the structural failure of a tree. Trees are living organisms that fail in ways we do not fully understand. Conditions are often hidden within trees and below ground. Arborists cannot guarantee that a tree will be healthy or safe under all circumstances, or for a specified period of time. Likewise, remedial treatments, like a medicine, cannot be guaranteed.

Treatment, pruning, and removal of trees may involve considerations beyond the scope of the arborist's services such as property boundaries, property ownership, site lines, disputes between neighbors, landlord-tenant matters, etc. Arborists cannot take such issues into account unless complete and accurate information is given to the arborist. The person hiring the arborist accepts full responsibility for authorizing the recommended treatment or remedial measures.

Trees can be managed, but they cannot be controlled. To live near a tree is to accept some degree of risk. The only way to eliminate all risks is to eliminate all trees.

Arborist:

John H. McClenahan

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**Appendix B**  
**Sacred Heart Schools Practice Gym Storm Water**  
**Detention Calculations**

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**Civil Engineering**  
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Job No. 27059-20

**Sacred Heart Schools**  
**Practice Gym Project**  
**Atherton, CA**

**STORM WATER DETENTION CALCULATIONS**

All runoff is detained in the on-site detention pond and metered through a control structure. The design criteria are that the detention system must be able to hold a volume equal to 2" over the impervious area and must discharge the water between 36 and 48 hours.

There is an existing detention pond located south of the Homer Center that will be expanded to account for the additional runoff produced by the new Practice Gym project.

Total approximate site area: 35,157 sf

Total proposed impervious area: 16,605 sf  
Total existing impervious area: 10,037 sf (existing basketball courts to be demolished)  
Total added impervious area: 6,568 sf

1. The storage volume required is computed as follows:

$$V = 6,568 \text{ sf} \cdot \frac{2 \text{ in}}{12 \text{ in} / \text{ft}} = 1095 \text{ cf}$$

2. The existing basin footprint is to be expanded by an area of 595 square feet. The basin depth is 3.3 feet. We check the added capacity of the basin as follows:

$$V_{\text{basin}} = 595 \text{ sf} \cdot 3.3 \text{ ft} = 1964 \text{ cf}$$

There is a layer of 30" permeable material at the bottom of the basin that treats the water. One-third of this material is void space that can act as storage. Its volume is computed as follows:

$$V_{\text{30" layer}} = 595 \text{ sf} \cdot \frac{30 \text{ in}}{12 \text{ in} / \text{ft}} \cdot \frac{1}{3} = 496 \text{ cf}$$

The total added capacity of the basin is  $1964 + 496 \text{ cf} = 2460 \text{ cf} > 1095 \text{ cf} \rightarrow \text{OK}$ .

3. Check that the detention pond is adequate to store the 100-year event:

Assume a 100-year storm has a 3" storm depth. Storm depth is based on rain gauge data tables at the Oakland Airport, as listed in Appendix D of the California Stormwater Quality Association Stormwater

BMP Handbook for New Development & Redevelopment. Rainfall was measured over a 37 year period from 1948 – 1986. The tables were developed using a continuous simulation model STORM by the U.S. Army Corps of Engineers; pavement storage of 0.06” and evaporation of 0.15” per day are included, and the assumed drainage area is 100 acres.

- **Pre-development**, the site has a runoff coefficient equal to 0.47.  $V_{before}$ , the pre-development runoff volume, is:

$$V_{before} = \left(\frac{3}{12} ft\right)(0.47)(35,157 sf) = \underline{4,142 ft^3}$$

- **Post-development**, the site has a runoff coefficient of approximately 0.64.  $V_{after}$ , the post-development runoff volume, is:

$$V_{after} = \left(\frac{3}{12} ft\right)(0.64)(35,157 sf) = \underline{5,593 ft^3}$$

- The net increase in runoff volume is the volume of detention required:

$$V_{required} = V_{after} - V_{before} = 5,593 - 4,142 = \underline{\underline{1,451 ft^3}}$$

The detention pond's added capacity of 2460 cubic feet exceeds the detention volume required for the 100-year storm.