# **INITIAL STUDY**

# LAUREL SCHOOL UPPER CAMPUS (O'CONNER SCHOOL SITE) NEW SCHOOL CONSTRUCTION PROJECT

June 2014

Prepared for:

Menlo Park City School District 181 Encinal Avenue Atherton, CA 95027

Prepared by:

Benson Lee, Consulting &
Arch Beach Consulting

# **TABLE OF CONTENTS**

		I	PAGE
I.	INTRO	ODUCTION	1
II.	PROJE	ECT DESCRIPTION	2.
11,	11001	REGIONAL LOCATION	
		PROJECT SITE LOCATION AND EXISTING CHARACTER	
		PROJECT SPONSOR'S OBJECTIVES	
		PROJECT DESCRIPTION	
III. El	NVIRON	NMENTAL CHECKLIST FORM	16
		DETERMINATION	17
		EVALUATION OF ENVIRONMENTAL IMPACTS	18
IV. R	ESPONS	SES TO THE ENVIRONMENTAL CHECKLIST FORM	27
	I.	AESTHETICS	27
	II.	AGRICULTURE RESOURCES	29
	III.	AIR QUALITY	
	IV.	BIOLOGICAL RESOURCES	32
	V.	CULTURAL RESOURCES	34
	VI.	GEOLOGY AND SOILS	
	VII.	GREENHOUSE GAS EMISSIONS	37
	VIII.	HAZARDS AND HAZARDOUS MATERIALS	38
	IX.	HYDROLOGY AND WATER QUALITY	41
	X.	LAND USE AND PLANNING	44
	XI	MINERAL RESOURCES	45
	XII.	NOISE	45
	XIII.	POPULATION AND HOUSING	49
	XIV.	PUBLIC SERVICES	49
	XV.	RECREATION	51
	XVI.	TRANSPORTATION/TRAFFIC	51
	XVII.	UTILITIES AND SERVICE SYSTEMS	68
	XVIII.	MANDATORY FINDINGS OF SIGNIFICANCE	70
V.	PREPA	ARERS OF THE INITIAL STUDY	72
		BENSON LEE, CONSULTING	72
		ARCH BEACH CONSULTING	72
VI. P	ERSONS	S AND AGENCIES CONTACTED	73
VII D	EEEDEN	NCES	74

# APPENDIX A. TRAFFIC DATA

# **LIST OF FIGURES**

	PAGE
Figure 1. Regional Location	3
Figure 2. Project Site and Vicinity	
Figure 3. Existing Site	
Figure 4. O'Connor School: Proposed Site Plan	
Figure 5. Existing Weekday AM Peak Hour Volumes	
Figure 6. O'Connor School Site Trip Distribution	
Figure 7. German American International School Trip Generation	
Figure 8. Encinal School Trip Distribution	61
Figure 9. Laurel School Trip Distribution	62
Figure 10.Combined Schools Trip Assignment	63
Figure 11.Existing plus Project Weekday AM Peak Hour Volumes	64
LIST OF TABLES	
	PAGE
Table XVI-1. Study Area Intersection and Traffic Control	53
Table XVI-2. Existing 2013 Intersection Level of Service Summary	56
Table XVI-3. Trip Generation Estimates	58
Table XVI-4. Existing plus Project Level of Service Summary	65

# I. INTRODUCTION

In accordance with Section 15070 et seq. of the California Environmental Quality Act (CEQA) and its Guidelines, the Initial Study, contained herein, has been prepared for the Menlo Park City School District (District) as documentation to support the proposed Negative Declaration for the development of the project known as the *Laurel School Upper Campus (O'Conner School Site) New School Construction Project.* The O'Connor site, located in the southeastern area of the City of Menlo Park, County of San Mateo, is currently under lease to the German American International School.

The Initial Study, herein, includes the location of the project site, project sponsor's objectives, and the description of the proposed project. The 2013 CEQA Environmental Checklist Form (Appendix G of the CEQA Guidelines) serves as the basis for the evaluation contained in the Initial Study. The ensuing evaluation of the potential environmental impacts, resulting from the implementation of the project, has been predicateded upon established significance and qualitative standards established as part of accepted CEQA practice and judgement, applicable standards of the City of Menlo Park, findings from the review of pertinent environmental information, and reconnaissance of the site.

The Initial Study examines the specific potential project-level physical environmental impacts that may result from the construction of the proposed facilities at the existing school site. Mitigation measures have been incorporated into the project to address potential impacts associated with the new facilities.

The Menlo Park City School District will serve as the "lead agency" (the public agency that has the principal responsible for carrying out and/or approving a project) for the proposed facilities development. The Initial Study document and the proposed approval of a Negative Declaration are subject to review and comment by responsible agencies and the public at-large during a mandatory public review period (typically 30 days). Formal public notification of the proposed Negative Declaration and the availability of the supporting documentation must be provided to responsible agencies and the public. The District is required to respond to environmentally relevant comments received during the public review period.

The governing board of the District will be responsible for ensuring that the environmental review and documentation meet the requirements of CEQA and for the subsequent consideration and adoption of the Negative Declaration for the *Laurel School Upper Campus* (*O'Connor School Site*) *New School Construction Project*. Should the District decide to carry out and/or approve the project for which the Negative Declaration has been adopted, the District will be required to file a "Notice of Determination" for posting by the County Clerk and the California Office of Planning and Research (a.k.a. the State Clearinghouse). The filing of the notice and its posting starts a 30-day statute of limitations on court challenges to the approval of the project under CEQA.

# II. PROJECT DESCRIPTION

## **REGIONAL LOCATION**

Located in the southeast part of San Mateo County (County) near San Francisco Bay, the City of Menlo Park (City) is situated in a highly urbanized area of the San Francisco Peninsula. It is bordered by other communities and jurisdictions including the Town of Atherton (Town) to the west, the cities of Palo Alto and East Palo Alto to the east, and pockets of unincorporated County lands adjacent to remaining portions of its City limits along with Stanford University to the south and southeast.

U.S. Highway 101, a major regional roadway, transects the northern portion of the City (Figure 1). This highway, along with State Route 82 (El Camino Real) in the central part of the City and Interstate 280 at the southern end, serve as the main northwest-southeast thoroughfares within the community. They connect the City with neighboring cities and other areas located within the San Francisco Peninsula. Middlefield Road and Alameda De Las Pulgas serve as other major local northwest-southeast streets.

Willow Road, which intersects both U.S. Route 84 and U.S. Highway 1, also crosses Middlefield Road. Major northeast-southwest residential thoroughfares within the community include Valparaiso Avenue/Glenwood Avenue and Santa Cruz Avenue.

Menlo Park, which lies in the plain between the Coastal Mountains to the west and San Francisco Bay to the east, covers an area of approximately six and one-half square miles. The City is primarily a residential community characterized by scenic, rural lands with an abundance of wooded areas. Commercial development occurs along several major roadways including El Camino Real, Santa Cruz Avenue and surrounding streets, and the Willow Road and Middlefield Road area. In addition, industrial land uses are located on the north side of U.S. Highway 101.

The year 2010 population was 32,026 and has been estimated at approximately 32,881 for April 1, 2012 (U.S. Census Bureau; www.census.gov/qfd/states/06/06466870.html), an increase of about 2.7 percent.

## PROJECT SITE LOCATION AND EXISTING CHARACTER

The proposed Laurel School Upper Campus (O'Connor School Site) project would be situated at 275 Elliot Drive in the southeast part of the City (Figure 2). Owned by the District, the site is located at the eastern terminus of Elliot Drive. Originally operated as a public school, the property was subsequently leased for operation as a private school. The approximately 6.0-acre parcel has an irregular shape with the main entry of the campus situated along the western perimeter of the property. The County Assessor's parcel number is 063-430-310.

Since 1991, the site has been leased and functions as the German American International School (GAIS). The facilities house a preschool, an elementary school, and a middle school. The current enrollment totals approximately 315 students (80 preschool; 150 in grades 1-4; and 85 in grades 5-9).

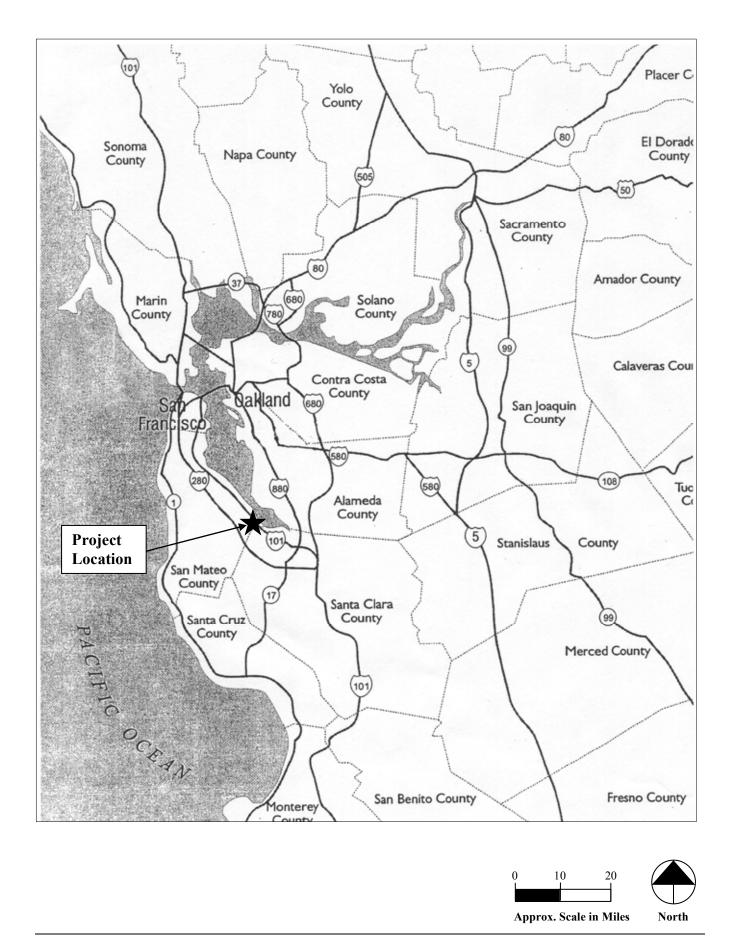
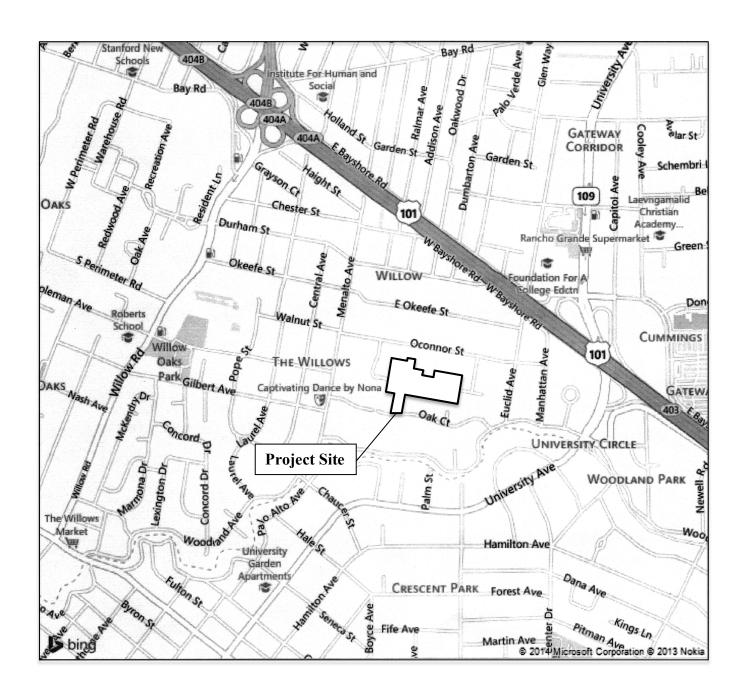
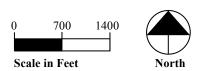


Figure 1
Regional Location





There are 60 staff members. Preschool generally runs from 8:25 a.m. to 1:45 p.m., elementary school from 8:20 a.m. to 2:00 p.m. Tuesday through Friday (Monday until 2:50 p.m.), and middle school from 8:20 a.m. to 2:50 p.m. Several after school programs and daycare run until 6:00 p.m. There are about 12 annual field trips for which school buses are used.

The facilities include a 14,000-square foot main building that provide administrative offices and ten classrooms, including the preschool and associated play area, near the school entry at Elliot Drive (Figure 3). Six portables, situated east of the main building and along the southern perimeter of the field and hardcourt area, and one additional portable, located in the northeast corner of the site, provide approximately another 10,000 square feet for classrooms, music and art room, and other functions. Campus structures are generally around 11 to twelve feet in height. In addition to the academic and administrative structures, facilities include: walkways; sitting areas and tables for lunch and outdoor assemblies; a hardcourt play area east and northeast of the main building; tennis courts; a natural turf field in the northeast area of the school; a small garden area near the eastern end of the main building; and metal storage containers located in the northwest corner of the site.

Elliot Drive, on the western perimeter of the school, serves as the only vehicle entry/exit to/from the GAIS for both ingress and egress. Two parking lots near the main building, the first with nine adjacent spaces and a second with 12 spaces nearby primarily for car pools, allow students to be readily dropped-off/picked-up and also serve as visitor parking. The primary parking lot, with 48 spaces arranged in three rows in the southwest corner of the site, is accessed via a one-way loop road. Another five spaces are located near the portable east of the main building.

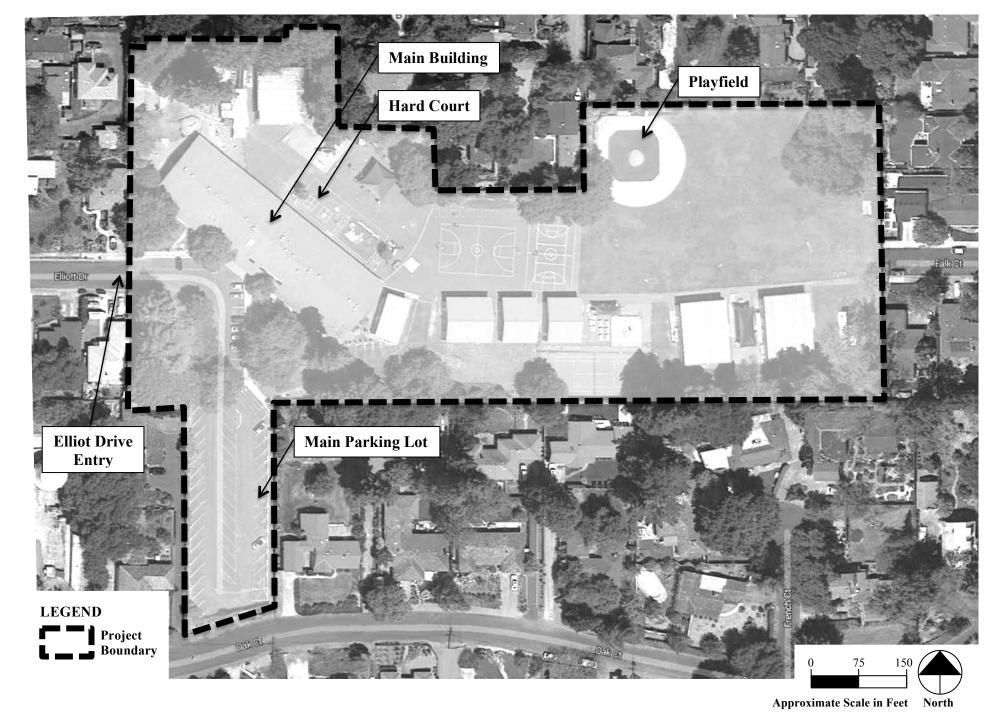
Pedestrian and cyclist access is available from Oak Court through a gate at the southern end of the primary parking lot. A bicycle rack is located near the main building.

The school is situated approximately 35 to 37 feet above mean sea level (msl). The site is relatively flat and drainage occurs toward the north and north-east. Large mature trees are located near the entry and main building areas. Perimeter fencing with a minimum height of six feet, and typically overgrown with vegetation, surround much of the school site. Along parts of this perimeter, the height of the fencing/foliage ranges from seven to ten feet high. In addition to the fencing, large numbers of mature trees are located on the southern, northern, and western sides of the campus.

The City of Menlo Park General Plan land use designation for the 6.0-acre site is "Public Facilities" and the zoning is "Public Facilities District" (P-F).

Single-family residential use surround the campus. Residences are situated on either side of Elliot Drive in proximity to the western side of the school. The backs and sides of several single-family residences, along with associated plantings, abut the perimeter fence on the west. Additional residences, obscured by trees and other dense landscaping, are located adjacent to the northern and much of the southern boundaries of the campus. More residences occur on the south side of Oak Court across from the school.

The City's General Plan designation for the surrounding residential uses is "Low Density Residential" and the zoning is classified as "Urban Residential District" (R-1-U).



Source: DLM Architects

Figure 3

Existing Site

## PROJECT SPONSOR'S OBJECTIVES

The District intends to implement the proposed project to provide needed educational facilities to accommodate further projected growth within its attendance area. During the last decade, student enrollment with the District increased by approximately 40 percent. To address this increase, the 2005-2007 Master Facility Plan called for the expansion of capacity and modernization of the District's four schools (Laurel, Encinal, Oak Knoll and Hillview), that were subsequently funded by the 2006 Bond, and which have been completed. As part of the implementation of the plan, some additional student capacity was added beyond the 2007 projected enrollment.

However, the District is presently experiencing addition attendance growth that is significantly beyond the projections from the 2005-2007 Master Plan. Consequently, enrollment has surpassed even the additional capacity that was added beyond the original plan. While Hillview Middle School has sufficient room to accommodate projected increases for grades 6 through 8, the three elementary schools are currently well above each of their target attendance and a fourth elementary school will be needed. The O'Connor site was selected for the location of the proposed new school since it is the only viable property that is owned and controlled by the District. Modern, up to-date facilities will be developed to address the increased demand for capacity and the educational needs of future students.

## **PROJECT DESCRIPTION**

#### Facilities Removal

The District has given notice to the GAIS on April 10, 2013 that the lease of the O'Connor site was terminated effectively by the end of June 2014 and the premises would be vacated by no later than May 15, 2015. The portables, which are owned by the GAIS would be removed. The existing main building would be subsequently demolished.

#### Construction Schedule

Plans for the proposed school would be submitted to the Division of the State Architect by the end of August 2014, with approvals expected by March 2015. Construction of the project would be initiated on May 15, 2015, with completion projected 13 months later at the end of June 2016. The opening of the school is scheduled for August 2016.

## **Funding**

The school development would be funded by local bond monies and other District sources such as developer fees. The District would also apply for eligible State funding.

The following provides a more detailed description of the major components of the proposed project.

## **Operation**

The maximum capacity of the new school would be 360 students with a staff of 36 to 40. School hours

for students would run from approximately 8:00 a.m. to 3:00 p.m. while staff hours would start at about 7:00 a.m. and end at 4:00 p.m. After-school activities (e.g., homework club, Parent-Teacher Organization-sponsored activities) would be similar to other schools within the District and would last from one to one and a half hours after school ends. Use of the field by the American Youth Soccer Organization (AYSO) and the Little League would continue at the new school along with the use of the gymnasium by the local basketball program.

Intended to be a neighborhood school, the majority of students are easily within walking and bicycling distance. The District does not plan to provide bus service to the new school. However, a shuttle bus service may potentially be established to reduce car trips for parents who have children at both the K-2 Laurel School and the grades 3-5 O'Connor School.

As part of its operations, the District would also be required to provide bus service for students from the Ravenswood School District attendance area who attend MPCS District schools under a court-ordered desegregation program (Tinsley). Under this program, either the Sequoia Union High School District or the District would provide bus service, resulting in one bus in the morning and one in the afternoon at the new school.

In addition, regular "yellow" buses would also be used for occasional field trips, which would average four to six trips per month. On rare occasion, charter buses may also be used for field trips

#### **Facilities**

#### **Structures**

A new single two-story classroom building of approximately 55,600 square feet would be constructed at the northwest corner of the 6.0-acre site near the Elliot Drive entry to the school (Figure 4). The structure would house both the academic and administrative functions. A total of 19 classrooms, including 14 standard sized (960 square feet each), two larger (1,100 square feet each), and art, science and music classrooms, would be provided along with a gymnasium. An attached multi-use building, with a stage, would be located in the southeast part of the new building. The maximum height of the classroom structure would be approximately 46 feet.

The architectural style of the new building would be "modern." The exterior materials would include stone veneer, cement plaster, glass and possibly wood or metal panels. As needed, shades would also be provided for windows so that the visibility of interior illumination during evening hours would be minimized.

Perimeter trees and landscaping would be maintained or new trees would be planted to provide screening of the building from neighbors. New wood fencing would be installed, as needed, to maintain neighbor privacy.

Exterior light would be reduced to the extent practicable and feasible and, at the same time, provide adequate illumination for security and safety. The height of any required lighting posts would be kept at a minimum (typically no more than 12 feet high) and lamps would be controlled by shielding so that the

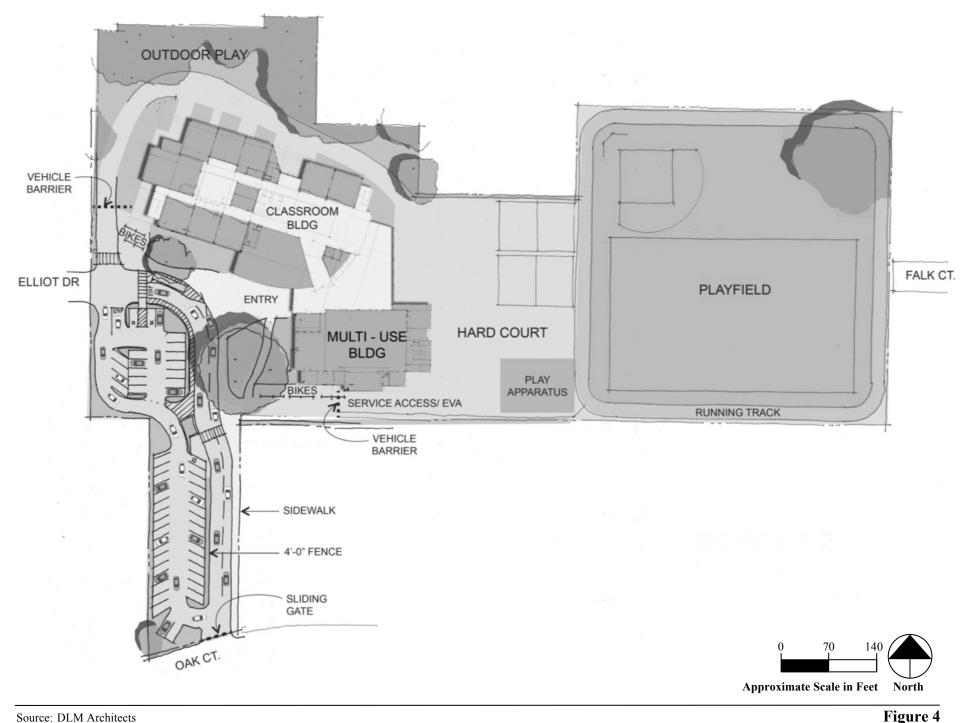


Figure 4
O'Conner School: Proposed Site Plan

cut-off angle of the fixtures do not create ambient illumination and off-site glare. To provide security and safety for pedestrians, stumble lighting would be installed around the building exterior. Bollard lights, with a height of no more than three to four feet, would be used in the parking lot and drop-off/pick-up areas to limit glare and illumination. All exterior light would be controlled by timers that would allow lighting to be turned on when darkness occurs and most lights (other than those for safety and security) turned off at an appropriate time later in the evening to save energy and minimize light from the campus.

The design of the new school would reduce both energy and water use. Building materials, walls and insulation, along with heating and cooling units, would be selected to lower energy requirements. Dual glazed windows, that can be opened to reduce air conditioning use, and insulated walls would be installed. Efficient HVAC equipment would also be specified that produces the least amount of noise and emissions and would be located and housed/shielded to further minimize noise. Restroom appurtenances would be selected to conserve water and lower flows. Landscape irrigation and watering would use automatic timers and other means (e.g., scheduling to lessen evaporation). Sprinkler systems would be installed in the building to enhance fire protection. The project would conform with Americans with Disabilities Act requirements (travel paths, ramps, signage).

A public address system would be designed to communicate with students in the interior of the campus and some parts of the playfield. Speakers would not be placed in parking the lot.

# Playfield and Hardcourt Play Areas

The existing turf playfield at the eastern part of the O'Connor site would be expanded from 1.3 acres to 2.16 acres and would include facilities for both baseball and soccer. A six-foot wide running track would be installed around the circumference of the playfield.

A hard court area for basketball, wall ball and a climbing structure, play apparatus, and a shade structure with seating for outdoor and classroom activities would be developed to the east of the main building. An outdoor play and classroom area would be provided at the northwest corner.

## **Circulation and Parking**

Elliot Drive would provide the main ingress and egress for vehicles coming to and from the school. The existing entry and parking lot would be reconfigured to enhance internal circulation and parking (Figure 4). The entry area lanes would be widened to facilitate movement of vehicles into the main parking lot loop road and the contiguous drop-off/pick-up area. The queuing for the drop-off/pick-up would be located on the eastern side of the parking lot. Two lanes would be available—one located curbside and a passing lane for exiting cars. The queuing lane would accommodate up to 31 vehicles. A sidewalk would be provided for pedestrians walking to and from the main building and adjacent facilities.

The main parking lot, with 36 spaces, arranged in two rows, would be used for staff parking. A smaller parking area, located nearer the main building, would provide an additional 17 spaces for visitors. Another 10 to 12 spaces would be available along the drop-off/pick-up lane for visitor parking during non-drop-off/pick-up times. During special events, approximately 73 total parking spaces would be provided, including the usual 53 available during regular school operations and an addition of 20 more in the hardcourt area.

Since the new facilities are intended to serve a neighborhood school where many students are expected to walk or ride bicycles, access would be provided from not only Elliot Drive, but from limited access gates at Oak Court. The District may also consider opening the Falk Court drive gate after consulting with the local neighbors in that location. A bicycle rack would be installed near the Elliot Drive entry close to the main building. A second rack would be situated at the southwest corner of the multi-use structure. To minimize conflicts with vehicle traffic, the same sidewalk alongside the pick-up/drop-off area would be used by bicyclists and cyclists. A designated crosswalk across the main entry at Elliot Drive would be provided. Marked crosswalks would also be in-place at key internal roadway locations.

The limited bus traffic to the school would enter from Oak Court through an automated sliding gate and use the outbound portion of the main parking lot loop road to exit the site at Elliot Drive. Emergency and service vehicles could also use the main entrance from Elliot Drive or Oak Court. The emergency gate off Falk Court would also be available for a third emergency access point.

# Additional Project Features

## Landscaping

Every effort, including the preparation of an arborist report and survey (Robert Weatherill, Advanced Tree Care., *Arborist Tree Assessment Report - American German International School - Menlo Park, California*, November 25, 2013), was considered to retain existing on-site trees, minimize removal of current trees, and the replacement of trees that must be taken out.

The proposed project would result in the loss of several large mature trees immediately south of the Elliot Drive entry to provide parking. To allow for required emergency vehicle access, a large tree would also be removed at the south side of the site along with two trees at the western perimeter of the school north of Elliot Drive. The trees would be taken out during initiation of construction activities.

In addition, up to 11 trees, located primarily within the northwest corner of the campus, may need to be removed based on health and safety considerations identified as part of the arborist's report. Disposition of these trees would be discussed with the local neighborhood as part of the decision-making process.

To replace trees and enhance existing screening and landscaping whenever possible, additional plantings, including trees, shrubs and groundcover, would be provided. New plantings would be chosen based on f their adaptability and sustainability to grow on the site and in accordance with the City's landscape design guidelines. Landscaping would include native species of trees and shrubs whenever possible. Strict tree protection measures (e.g., setback from construction activities to protect roots; fencing) would be implemented to protect existing trees that would remain within the campus. The irrigation system would be designed to be efficient and conserve water (e.g., drip bubblers for small areas and individual trees; spray irrigation for large areas of landscaping).

## **Fencing**

Pending discussions between the neighbors and the District, portions of the existing perimeter fence, composed of chain link that is six feet high or less (not counting any lattice work), would be removed and

replaced by new six-foot tall solid wooden fencing and lattice work with an additional height of two feet. Remaining chain link fencing would also be repaired as needed.

Areas of potential replacement fencing would occur along the main parking lot area, the western and much of the northern school perimeter, and a section near the proposed multi-use building. Chain link along the remainder of the southern site boundary would be repaired as required.

## Infrastructure

The proposed project would require minimal infrastructure (water, sewer, electrical, gas) improvements that would be provided by connections to existing utilities with any repair and/or rerouting as needed. Storm drainage, which currently sheet flows overland and discharges to off-site City right-of-way at Elliot Drive, Oak Court, and Falk Court, would be upgraded by collecting stormwater runoff through a network of subsurface drainage facilities as part of stormwater treatment and detention requirements and would be conveyed and released to the City right-of-way through two proposed pump systems, one at Elliot Drive and the other at Falk Court.

To meet local and State post-construction requirements and Best Management Practices (BMPs), C.3 measures for stormwater management would be incorporated into the project for the collection, treatment and detention of on-site runoff through the use of site design, source control, and treatment. Measures would include, but may not be limited to, flow-through planters, tree well filters, and natural self-treating turf and landscaping areas. The rate of off-site stormwater discharge would be regulated so that the proposed project peak runoff quantity would not exceed pre-project levels.

Solid waste disposal would be furnished by Recology of San Mateo through franchise agreements already in-place. Consistent with State Assembly Bill 939 for solid waste reduction and recovery, the District would maintain recycling and solid waste minimization measures for operation of new facilities as part of its ongoing District-wide program. Potable water would be provided by American Water Service while water for field irrigation would be furnished by the O'Conner Tract Coop Water District.

For landscaping and the building maintenance, limited amounts of materials, such as cleaning solvents, fertilizers and herbicides, would be used at the school site. As part of its ongoing program, the District would provide ongoing management of these substances in accordance with manufacturers' requirements and to minimize the amounts that would be used to the extent practicable.

# Design, Site Preparation and Construction

## Design, Plans and Permitting

Detailed design plans for the new school facilities have been prepared. The plans would be consistent with the Division of the State Architect, State Department of Education criteria and the *California Building Code* (2010).

Based upon their geotechnical review, subsurface borings and soil sampling results and the geologic and seismic hazards assessment (*Geotechnical Engineering Investigation and Geologic Hazard Evaluation-Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California*,

February 2014), BAGG Engineers, consultants to the District, concluded that the development of the proposed new facilities would be geotechnically feasible provided that recommendations from the preliminary review are implemented.

To ensure that structural requirements of the California Education Code are met, the District would incorporate applicable findings and recommendations from the geologic investigation prior into the final design plans to be submitted to the Division of the State Architect. In particular, measures would address the presence of moderately expansive soil at shallow depths and the location of the site in relative proximity to hazards associated with seismic shaking.

Recommendations would include, but may not be limited to: site preparation and grading procedures such as the removal of foundations, concrete slabs, vegetation, topsoil, and utility lines; compaction of soils and use of proper fill materials; use of conventional spread/strip footings with a concrete slab-ongrade floor; employment of retaining walls to resist lateral earth pressures from adjoining natural materials and backfills; import of non-expansive engineered soils or mixing of quick lime with existing soils; and installation of drainage facilities to channel water away from foundations and structures and avoidance of erosion. Qualified geotechnical staff would provide monitoring of soils and foundation work and testing during construction.

Site grading would be minimal and would consist of minor cuts and fills. Proposed grading would maintain existing drainage patterns and provide for natural overland discharge points to the existing City right-of-way at Elliot Drive, Falk Court, and Oak Court. No substantial topographical changes have been proposed or would occur within the present school site.

The new structures would include earthquake-resistant construction to minimize the potential damage from any potential seismic events that may occur within the region. Interior fixtures (e.g., lights, high shelving) would be attached to maximize safety during seismic events. The proposed project would also meet regulations (e.g., fire lanes, emergency access, fire-resistant materials, water pressure and hydrants) set forth for public schools by the State Fire Marshall. As described earlier, fire sprinklers would be installed in each of the new buildings. The structures would also conform with current standards and design for energy-efficient insulation, lighting, and heating and cooling systems. Exterior materials would be selected to reflect heat.

As required, an encroachment permit would be obtained from the City for possible minor curb improvements and upgrades to entrances at Elliot Drive and Oak Court along with any other work that would be performed outside the boundaries of the school site.

## **Site Preparation and Construction**

Construction activities would involve excavation, grading, and facilities development that would require the use of equipment such as excavators, backhoes, graders, dump trucks, loaders, compactors, dozers, pavers, concrete trucks, and other heavy machinery. To minimize potential environmental impacts during construction, measures (part of standard site preparation and construction practices) would be incorporated into the proposed project. They include the following:

## Erosion Control and Water Quality

The District would obtain a "General Construction Activity Stormwater Permit" to conform with Regional Water Quality Control Board requirements for projects where one or more acres are disturbed (the area affected by the proposed project is less than one acre). Nevertheless, consistent with the conditions of the permit, Best Management Practices (BMPs) would be used to control possible erosion and sedimentation and to maintain water quality. These measures could include, but not be limited to, the use of temporary detention basins, the placement of hay bales for reducing siltation from any site runoff, timely covering of construction areas, periodic street sweeping to remove soil from construction activities, and restriction of grading to the dry season. Landscaping for the project, including trees and shrubs, would be planted shortly after site preparation to further minimize the possibility of erosion.

Consistent with local and State requirements, the District would prepare a Stormwater Pollution Prevention Program (SWPPP) to protect water quality on-site and within the watershed and coordinate its efforts with the City and San Mateo County. Measures could consist of, but not be limited to, education of staff and maintenance personnel to practice good housekeeping activities (e.g., immediate clean-up of any spills in parking lots with absorbent materials and subsequent proper disposal), weekly collection of litter from campus and parking lots, periodic vacuum cleaning of parking lots and inlets prior to, and immediately after the rainy season, and continued management for the use of materials such as fertilizers and pesticides. The SWPPP would be periodically inspected as required by applicable regulations.

# Control of Air Emissions

To minimize air quality impacts to the lowest practicable levels consistent with Bay Area Air Quality Management District (BAAQMD) guidelines, Best Available Control Technologies (BACTs) would be employed to maintain the tune of construction equipment, lessening engine idling along with possible use of electrical power in lieu of gasoline or diesel-driven equipment. Dust (particulate matter), and to a lesser extent, other air emissions, would be controlled by implementing the followings: (1) preparing and adopting a comprehensive construction activity management plan to most effectively use construction equipment and assure it is properly maintained; (2) periodically watering, sprinkling or treating any soils piles and unpaved site grading to prevent airborne dust from leaving the property and increased watering whenever wind speeds exceed 15 miles per hour; (3) covering or watering all excavated materials transported off-site; (4) limiting on-site vehicle speeds; (5) removing mud and soils from the tires of equipment before leaving the site; (5) planting new and replacement landscaping as soon as possible after initiation of project construction; and (7) sweeping adjacent streets as needed to remove dirt.

## Noise Controls

To reduce potential noise-related impacts from site preparation and construction activities, the District would observe construction times (7:00 a.m. to 6:00 p.m. Monday through Saturday) consistent with the City of Menlo Park Noise Ordinance (Chapter 8.06.050) in which the District, as a quasi-agency of the state, is exempt from the general time frame (i.e., 7 a.m. to 6 p.m. M-F) for construction activities. Measures to minimize noise would include the following: (1) muffling or control of any loud construction equipment; (2) set back procedures with the highest noise potential away from any nearby residences; (3) perform noisy procedures at an off-site location as practicable; (4) schedule construction, as feasible, so that the shell of the structure can be partially finished for use as a noise buffer; and (5)

notify nearby residents beforehand of particularly noisy construction activities. In addition, the District would notify neighbors in the event that work is scheduled outside of its usual work hours or days. School buildings would be insulated to meet State requirements for internal noise (45 decibels).

## Health and Safety Measures

Site preparation and construction activities would be conducted consistent with Occupational Health and Safety Administration (OSHA) and CalOSHA regulations and local requirements to provide for worker and public safety. To protect the general public, as applicable, the proposed building areas would be fenced and signed and other appropriate measures taken to restrict public access. Applicable regulatory and cautionary signage (and personnel if required) in the construction area would be installed and traffic controls, as appropriate, would be implemented. When utility/service lines are to be connected, the appropriate agency would be notified and in-place procedures would be followed to protect/relocate the utilities. Off-site transport of materials deemed hazardous would be managed in accordance with applicable local, state and federal regulatory requirements.

The District entered into an oversight agreement in April 2014 with the California Department of Toxic Substances Control (DTSC) to address the presence of hazardous materials at the school site. As part of the agreement, the District's consultant, Terraphase Engineering, Inc., prepared and submitted a Draft Preliminary Assessment (PEA) Work Plan (Terraphase Engineering Inc., *Draft Preliminary Endangerment Assessment Work Plan - 275 Elliott Drive - Menlo Park, California 94025*, March 24, 2014) to the DTSC for review and approval. A subsequent site investigation indicated that some shallow soil adjacent to the existing building foundation has been impacted with termiticides and that imported base rock beneath the existing asphalt may be affected by low levels of naturally occurring asbestos. A PEA Report will be prepared and submitted to the DTSC, summarizing the soil data results and identifying the estimated extent of the soil impacts.

The District and its consultant will work with the DTSC to determine applicable and appropriate remedial and/or mitigation measures to address potential effects from soil contamination issues during further investigation. Consistent with A.B. 972 for the DTSC School Site Review Process, the District would de-link the CEQA process from the PEA review requirements.

## Protection of Potential Cultural Resources

To ensure site preparation and construction do not result in adverse effects on potential, unknown cultural resources and consistent with regulations and accepted protocols to protect cultural resources, a qualified cultural resources specialist would be present during site preparation activities. In the event that culturally significant materials is uncovered, work may be halted and appropriate mitigation actions would be taken, consistent with the CEQA Guidelines and applicable federal requirements. Measures may include, but not be limited to, provision of setbacks and avoidance of the area until the extent of the impact and any subsequent procedures (e.g., excavation plan) can be identified and implemented, development of specific protocols, and, as required, contact with the Native American Heritage Commission.

# III. ENVIRONMENTAL CHECKLIST FORM

# 1. **Project Title:**

Laurel School Upper Campus (O'Conner School Site) New School Construction

# 2. Lead Agency Name and Address:

Menlo Park City School District 181 Encinal Avenue Atherton, CA 94027

# 3. Lead Agency Contact Person and Phone Number:

Ahmad Sheikholeslami, Director of Facilities and Operations Menlo Park City School District 181 Encinal Avenue Atherton, CA 94027 (650) 321-7140

## 4. **Project Location:**

275 Elliot Drive Menlo Park, CA 94025

# 5. **Project Sponsor's Name and Address:**

Menlo Park City School District 181 Encinal Avenue Atherton, CA 94027

- 6. **General Plan Designation:** Public Facilities
- 7. **Zoning:** Public Facilities District (P-F)
- 8. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for implementation. Attach additional sheets if necessary.)

See previous discussion (Chapter II, Project Description)

- 9. Surrounding Land Uses and Setting: See previous discussion (Chapter II, Project Description)
- 10. **Other Agencies Whose Approval is Required** (e.g., permits, financing approval, or participation agreement): California Department of Education; California Division of the State Architect; California Office of Public School Construction; Regional Water Quality Control; City of Menlo Park (various departments)

## **Environmental Factors Potentially Affected:**

one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. Aesthetics ☐ Agricultural and Forestry □ Air Quality Biological Resources Resources □ Cultural Resources Geology/Soils □ Hazards & Hazardous Greenhouse Gas Emissions ☐ Hydrology/Water Quality Materials □ Mineral Resources □ Land Use/Planning □ Noise □ Population/Housing □ Public Services □ Recreation □ Transportation/Traffic □ Utilities/Service Systems □ Mandatory Findings of Significance **DETERMINATION** On the basis of this initial evaluation: X 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 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

The environmental factors checked below would be potentially affected by this project, involving at least

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 or NEGATIVE DECLARATION, pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT OR NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project.

☐ 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

IMPACT REPORT is required.

Olmad Sheikholeslami

6/26/14

## EVALUATION OF ENVIRONMENTAL IMPACTS

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parenthesis following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to a project like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
  - a) Earlier Analysis Used. Identify and state where they are available for review.
  - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable

legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

- c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
  - a) the significance criteria or threshold, if any, used to evaluate each question; and
  - b) the mitigation measure identified, if any, to reduce the impact to less than significance.

## **Issues:**

	Potentially Significant Impact	Significant Unless Mitigation Incorpor- ation	Less Than Significant Impact	No Impact
I. AESTHETICS Would the project				
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?				1
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?			✓	

Potentially

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorpor- ation	Less Than Significant Impact	No Impact
II. AGRICULTURE RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resource, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board — Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the 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, 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))?				✓
d) Result in the loss of forest land or conversion of forest land to non-forest use?				1
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 or conversion of forest land to non-forest use?				✓
III. AIR QUALITY 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:				
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 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?			✓	
IV. BIOLOGICAL RESOURCES Would the project:				
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?				✓

Game or U.S. Fish and Wildlife Service?

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorpor- ation	Less Than Significant Impact	No Impact
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?				✓
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?				✓
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?				1
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?				✓
V. CULTURAL RESOURCES Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in SS15064.5?				1
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to SS15064.5?				1
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?				✓
VI. GEOLOGY AND SOILS Would the project:				
<ul> <li>a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:</li> </ul>				
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 Publication 42.				1
ii) Strong seismic ground shaking?			✓	
iii) Seismic-related ground failure, including liquefaction?			✓	
iv) Landslides?				1
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?			1	
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?			✓	

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorpor- ation	Less Than Significant Impact	No Impact
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?				1
VII. GREENHOUSE GAS EMISSIONS Would the project:				
a) Generate greenhouse gas emissions, 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 emissions of greenhouse gases?				1
VIII.HAZARDS AND HAZARDOUS MATERIALS Would the project:				
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?			1	
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 it create a significant hazard to the public or the environment?			1	
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 result in a safety hazard for people residing or working in the project area?				✓
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				1
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				1
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?				✓
IX. HYDROLOGY AND WATER QUALITY Would the project:				
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)?			✓	

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorpor- ation	Less Than Significant Impact	No Impact
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?				1
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 stormwater drainage systems or provide substantial additional sources of polluted runoff?			1	
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?				1
j) Inundation by seiche, tsunami, or mudflow?				✓
X. LAND USE AND PLANNING - Would the project:				
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?				1
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				1
XI. MINERAL RESOURCES Would the project:				
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?				1
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?				✓
XII. NOISE Would the project result in:				
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?			✓	
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?			✓	

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorpor- ation	Less Than Significant Impact	No Impact
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 within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				1
XIII. POPULATION AND HOUSING Would the project:				
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)?			1	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				✓
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				1
XIV. PUBLIC SERVICES				
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 public services:				
Fire protection?				1
Police protection?				✓
Schools?				✓
Parks?				✓
Other public facilities?				✓
XV. RECREATION				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility 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?				/

# XVI. TRANSPORTATION/TRAFFIC -- Would the project:

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorpor- ation	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>√</b>	
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?			<b>√</b>	
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) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			1	
XVII. UTILITIES AND SERVICE SYSTEMS Would the project:  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?				1
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?				1
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?			<b>√</b>	<b>√</b>
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?				✓

	Potentially Significant		
Potentially	Unless Mitigation	Less Than Significant	
Significant	Incorpor-	Impact	No
Impact	ation	F	Impact

#### XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- 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 animal community, reduce the number or restrict the range of a rare or endangered plant or animal 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 which will cause substantial adverse effects on human beings, either directly or indirectly?

# IV. RESPONSES TO THE ENVIRONMENTAL CHECKLIST FORM

The following explanations are presented in response to the items contained in Chapter III, CEQA Environmental Checklist Form. The explanations are keyed to the corresponding number and letter of the topic presented in the checklist. The discussion contained in the responses are predicated upon information and judgements from the lead agency. Criteria to define the level of impact upon environmental resources have been set forth. The significance criteria has been based upon quantitative thresholds (e.g., noise levels) where applicable, professional judgements as deemed appropriate and necessary by CEQA., and standards that have become commonly accepted as part of the preparation of CEQA documentation. In accordance with CEQA, ".....a significant impact is a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project." As appropriate and applicable, a reference or source for supportive information has been cited within the response for each topic.

## I. AESTHETICS

## Significance Criteria

Would the project:

- a) have a substantial adverse effect on a scenic vista, resulting in the obstruction of any scenic view or vista open to the public?
- 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 surrounding?
- d) create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. Sources could include those that would directly illuminate or reflect upon adjacent property or could be directly seen by motorists or persons residing, working or otherwise situated within sight of the project. The significance level may be determined by the intensity of the lighting?

The City of Menlo Park does not have a visual resources ordinance. Ordinances relevant to visual effects associated with buildings (Chapter 16.68 of the "City of Menlo Park Zoning Ordinance," August 2006) are set forth for height of public buildings, architectural controls [appearance and consistency with character of neighborhood], and accessory buildings (Note that the District has exempted itself from the City's zoning ordinances through District Resolution 06.07.30, May 7, 2007).

## a) Have a substantial adverse effect on a scenic vista?

*No Impact.* Implementation of the proposed project would have a less than significant impact on a scenic vista or affect the visual resources visible from surrounding areas. There are no important scenic vistas within the school campus or the surrounding vicinity. The area around the existing school include single-family residential uses and associated landscaping. The topography is flat so that there are no "superior" (i.e., elevated) view locations. In addition, vistas are substantially foreshortened or precluded by existing residences, school structures, streets, and extensive plant cover, including many

mature trees and other landscaping along the school site boundary and within the adjacent residential properties. A minimum six-foot high fence, generally overgrown with vegetation. runs along the entire perimeter of the project site. In some sections, the height ranges from seven to well over ten feet.

Existing views of the school are generally limited. Areas around the school entry and main building are partially visible from nine single-family residences on Elliot Drive. The main parking lot is evident from the backyards of four adjacent residences and a half dozen residences on Oak Court. The playfield area is readily visible from one two-story residence at the end of Falk Court. Intervening fencing and extensive landscaping significantly screen views from the six residences on the south and over half of the approximately 12 residences on the north perimeter of the school site. Vegetative cover, within both the school site and the residential properties, is particularly dense at the north-northwestern perimeter, where the existing main building is located, while the school facilities (particularly the field) is partially visible through chain link fencing from the backs of remaining residences on the northern boundary.

The proposed project would not substantively alter the existing visual environment. There would be temporary activities visible from view locations, described above, during the 13-month construction period. After the completion of the facilities, views from residences along Elliot Drive, Oak Court, and Falk Court would change, but not significantly. The site would continue to be used for school activities. The main parking lot area would continue to be used for vehicle circulation and drop-off/pick-up activities. The grove of trees at the front entry would be removed along with several other mature trees. A new two-story building, located in approximately the same locale would replace the current one-story main building. The structure would not be readily visible to residents immediately due to the dense intervening screen of fencing, trees, and other vegetation. In addition, implementation of proposed six-foot high solid wood fencing with an additional two-foot high lattice to replace existing chain link fencing, currently six feet or less in height, along portions (i.e., entry, main parking lot, parts of the west, north, and south boundaries) of the school perimeter would enhance visual privacy at several residences.

Since there are no substantial scenic vistas within the area, no significant visual impacts upon such resources would be affected either during construction or the post-construction operation of the school. The District has exempted itself from the City's zoning ordinances. However, the City's building conditions have been taken into consideration as part of the design of the proposed facilities.

## b) Substantially damage scenic resources within a State scenic highway?

*No Impact.* No State-designated scenic highways are located adjacent to or in the vicinity of the project site. The nearest State highway is Highway 101to the north. No views of the site are visible from the highway.

# c) Substantially degrade existing visual character or quality?

Less Than Significant Impact. Please see the response to item I.a, above.

## d) Create new sources of light or glare that would affect views in the area?

Less Than Significant Impact. Construction activities and future operation of the school would add light and glare within the surrounding area. However, these new sources of light and glare would not

substantially affect views within the area of the proposed school project. Visual impacts from construction (e.g., equipment, worker vehicles) would be short-term and intermittent, limited generally to daylight hours, and would therefore not cause significant effects.

During operation, the proposed project could result in light and glare from sources that include reflections from new building surfaces and glass from the two-story structure and parking lot at the southwest corner of the campus that could be visible from several residences to the west and across Oak Court from the school. However, such light and glare would be minimized to a less than significant level by the setbacks from adjacent streets, the existing fencing, trees, and other vegetation, and the use of minimal lighting for safety and security that would be shielded to address off-site glare. Please also see the response to item I.a, above.

#### II. AGRICULTURE RESOURCES

## Significance Criteria

Would the project:

- a) convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
- b) conflict with existing agricultural zoning or a Williamson Act contract?
- c) conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code section 122220(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 forest land or conversion of forest land 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 or conversion of forest land to non-forest use?

## a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance?

*No Impact.* Located within an existing school site in the City of Menlo Park, implementation of the proposed project would not involve any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

b) Conflict with existing agricultural zoning or a Williamson Act contract?

*No Impact.* The Williamson Act is not applicable to the site. See the response to item II.a, above.

c) Conflict with existing zoning or cause rezoning of forest land or Timberland Production?

No Impact. There are no forest lands or timber production at the school site.

d) Loss or conversion of forest land to non-forest use?

No Impact. There are no forest lands at the school site.

# e) Changes to environment leading to conversion of Farmland or forest land to non-agricultural use?

No Impact. There are no farmlands or forest lands at the school site.

## III. AIR QUALITY

## Significance Criteria

Would the project:

- a) conflict with or obstruct implementation of the applicable air quality plan?
- b) violate any air quality standard or contributes substantially to an existing or projected air quality violation?
- c) result in a cumulatively considerable net increase of any criteria pollution for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors?
- d) exposes sensitive receptors to substantial pollutant concentrations?
- e) create objectionable odors affecting a substantial number of people?

The Bay Area Air Quality Management District (BAAQMD) has developed significance thresholds criteria for operational-related air emissions and precursors under its CEQA Guidelines (updated May 2011). They include:

- Reactive Organic Compounds (ROG) 10 tons/year or 54 pounds/day.
- Nitrogen Oxides (NOx) 10 tons/year or 54 pounds/day.
- Particulate matter (PM10) 15 tons/year or 82 pounds/day.
- Fine particulate matter (PM2.5) 10 tons/year or 54 pounds/day.
- Local Carbon Monoxide (CO) nine parts per million (eight-hour average); 20.0 ppm (one-hour average)

In addition, the BAAQMD has established CEQA significance threshold criteria for construction-related air pollutants and precursors that include daily average emissions for ROG, NOx and PM2.5 of 54 pounds/day and 82 pounds/day for PM10.

The BAAQMD CEQA Guidelines also identify the kinds of land uses that may lead to exceedance of significant threshold levels for specific operational emissions. Examples under the operational criteria screening size include: 325 new single-family housing units (NOx); general office building of 346,000 square feet (NOx); an elementary school with 2,747students (ROG) or 271 square feet (NOx); and a two-year community college with either 152,000 square feet of developed floor area or 2,390 students (NOx).

For construction-related activities, examples of development that would result in significant levels of ROG include: 114 single-family residences; general office building of 277,000 square feet; an

elementary school with 3,904 students or 277,000 square feet; and a two-year community college with either 3,261 students or 277,000 square feet.

The Bay Area Air Quality Management District (BAAQMD) has developed significance thresholds for air emissions under CEQA Guidelines. They include:

- Reactive Organic Compounds (ROG) 15 tons/year or 80 pounds/day.
- Nitrogen Oxides (NOx) 15 tons/year or 80 pounds/day.
- Fine particulate matter (PM10) 15 tons/year or 80 pounds/day.
- Carbon Monoxide (CO) 550 pounds/day.

The BAAQMD CEQA Guidelines also identify the kinds of development that may lead to significant levels of operational emissions. Examples include approximately 375 new single-family housing units, general office development of 305,000 square feet, or a community college with 345,000 square feet of developed floor area.

# a) Conflict with or obstruct implementation of applicable air quality plan?

No Impact. The implementation of the proposed project would result in short-term emission of particulates and other contaminants from preparation of the site and construction along with a relatively small quantity of other pollutants (e.g., carbon monoxide [CO], reactive organic gases [ROG] and nitrogen oxides [NOx] which are ozone precursors) from construction equipment. To minimize the local impacts from site preparation and construction activities, Best Management Practices (BMPs) for dust suppression and Best Available Control Technologies (BACTs) for combustion engine emissions control have been incorporated as part of the proposed project (see Chapter II, Project Description). Incorporation of these measures would be consistent with BAAQMD guidelines that constitute part of the applicable air quality plan. In addition, the project would be designed so that lighting, cooling and heating equipment would be energy and environmentally efficient in accordance with the State building codes and other State standards. Furthermore, as a neighborhood school, a relatively large number of students have been projected to walk or bicycle to the campus.

## b) Violate any air quality standard or contribute to an existing or project air quality violation?

Less Than Significant Impact. Given the project scale and its duration of construction, daily significance thresholds for criteria emissions that include ROG (of which ozone is a constituent), NOx, CO, sulphur oxides [SOx], and PM10 would not be exceeded during either construction activities or the operation of the new school. The scale of the proposed project falls well below the kinds of development that would be expected to generate significant levels of elevated air emissions. Furthermore, the number of trips associated with the school would not significantly increase since the enrollment of the new school would only increase by about 45 students (360 plus 35 to 40 staff vs. the current 315 students and 60 staff at the GAIS). In addition, the design of the project (e.g., efficient and low-energy lighting, heating, cooling equipment) and the improved vehicular circulation during pick-up/drop-off periods would minimize contributions to regional air emissions.

During the relatively short-term of construction, a relatively small quantity of pollutants would occur from the use of construction equipment and site preparation. To minimize the local impacts from construction activities, measures for dust suppression and combustion engine emissions control have been incorporated as part of the proposed project. Potentially adverse effects during site preparation and construction would be less than significant with incorporation of these measures and Best Available Control Technologies (BACTs).

# c) Result in a cumulatively considerable net increase of any criteria pollutant for which the region is in non-attainment?

Less Than Significant Impact. The proposed project would result in a relatively minor increase in air emissions associated with construction. No other net increase in the cumulative level of any criteria pollutant (i.e., particulates, ozone) for which the region is in nonattainment would occur. See also the response to items III. a and b, above.

# d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. There are no hospitals (the Veterans' Hospital is over 0.65 mile away), senior facilities or similar sensitive receptor locations in the immediate vicinity. On-site construction would expose nearby residents to potential emissions generated by associated activities (i.e., particulates from site preparation and low levels of ROG, NOx and CO from equipment). However, because of the relatively short duration and intermittent nature of construction and measures incorporated into the project to control particulates and other emissions to the extent practicable, pollutant concentrations would not be substantial and potential impacts would be less than significant.

# e) Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. There may be some objectionable odors from the operation of diesel-powered equipment during construction of the proposed facilities at the school site. However, these odors would be limited to the short-term construction period of the project and would not be significant. Future operation of the new facilities would not result in objectionable odors.

## IV. BIOLOGICAL RESOURCES

## Significance Criteria

Would the project:

- a) have a substantial adverse effect, either directly or indirectly, or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local/regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service or any species protected under provisions of the Migratory Bird Treaty Act?
- b) have a substantial effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the agencies above?
- c) have a substantial 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?

d) interfere substantially with the movement of any native resident or migratory wildlife species or with

established native resident or migratory wildlife corridors, or impede 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 habitat conservation plan?

## a) Effect on candidate, sensitive, or special status species?

*No Impact*. The proposed project site would be located within an already existing school site. The campus is surrounded by single-family residences and city streets.

# b) Substantial effect on any sensitive natural communities?

*No Impact.* Please see the response to item IV.a, above.

## c) Substantial effect upon federally protected wetlands under Section 404?

*No Impact.* No wetland areas are present on the project site. Please see the response to item IV.a, above.

# d) Interfere with movement or migratory corridors of native residents or migratory species, or use of native wildlife nursery sites?

*No Impact.* Please see the response to item IV.a, above. Existing residential uses surround the school site and the facilities would be within an existing school site. There are no natural habitats within the vicinity that would attract native residents or migratory species.

# e) Conflict with any local policies/ordinances for protection of biological resources?

*No Impact.* Please see the response to item IV.a, above. There are no known local policies or ordinances for the protection of biological resources that are applicable to the proposed project and there are no unique or sensitive habitats within the property. The District has exempted itself (District Resolution 06.07.30, May 7, 2007) from the City's ordinances, including the protection of heritage trees (Chapter 13.24).

As part of the proposed project, several large mature trees would be removed near the south side of the Elliot Street entry to provide parking. A large tree would also be removed at the south side of the site and two others at the western perimeter north of Elliot Drive to allow for development of a required emergency vehicle access road.

The District would maintain the remaining existing trees to the extent practicable. The disposition of 11 trees, recommended for removal due to their health and safety issues in the arborist's report, would be discussed with the local neighborhood prior to any action by the District.

#### f) Conflict with Habitat Conservation Plan or other approved conservation plan?

*No Impact.* There is no Habitat Conservation Plan or other approved conservation plan that is applicable to the site or the project. Please see the response to item IV.a, above.

#### V. CULTURAL RESOURCES

#### Significance Criteria

Would the project:

- a) cause a substantial change in the significance of a historical or resource as defined in §15064.5?
- b) cause a substantial adverse change in the significance of an archaeological resource pursuant to \$15064.5?
- c) directly or indirectly destroy a unique paleontological resource, site or unique geological feature?
- d) disturb any human remains, including those interred outside of formal cemeteries?

### a) Substantial effect upon historical resource?

*No Impact.* The proposed project would occur within an existing school site that has been highly disturbed during previous development and use as educational facilities. There are no known historical structures or resources within the site. To ensure that there would be no substantial effects upon any historical resources, measures (e.g., presence of a qualified cultural resource specialist during site preparation activities) have been incorporated as part of the proposed project to address any potential impacts.

#### b) Substantial effect upon an archaeological resource?

No Impact. To ensure that site preparation and construction do not result in adverse effects upon potential, unknown cultural resources, and consistent with regulations and accepted protocols to protect all cultural resources, a qualified cultural resources specialist would be present during site preparation activities. In the event that culturally significant materials are uncovered, work may be halted and appropriate mitigation actions would be taken, in accordance with the CEQA Guidelines and any applicable federal requirements. Measures may include, but not be limited to, provision of setbacks and avoidance of the area until the extent of the impact and any subsequent procedures (e.g., excavation plan) can be identified and implemented, development of specific protocols, and, as applicable, contact with the Native American Heritage Commission.

#### c) Destroy unique paleontological resource or site or unique geologic feature?

*No Impact.* The project site is underlain by Holocene-age (younger than 11,000 years) alluvial fan "natural" levee deposits associated with the San Francisquito Creek channel which is located about 700

feet to the southeast. Sand and silty sediments were deposited along both sides of the channel, forming slightly raised topographic natural levees (BAGG Engineers, *Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California*, February 2014). Given the relatively young age of the underlying materials, it would preclude the likelihood that any significant paleontological resources occur beneath the school site. Also, the property is not adjacent to a watercourse (though it is relative proximity to San Francisquito Creek). Furthermore, site foundations would generally be limited to relatively shallow depths. No rock outcropping, or other unique geological features exist at the site..

As part of the proposed project, a qualified cultural resources specialist would be present during site preparation activities. In the event cultural resources are detected during construction, measures (e.g., halt construction activities) have been incorporated to minimize any potential impacts.

#### d) Disturb any human remains?

*No Impact.* Please see the response to item V.b, above.

#### VI. GEOLOGY AND SOILS

#### Significance Criteria

*Would the project:* 

- a) expose people or structures to potentially 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; (ii) strong seismic groundshaking; (iii) seismic-related ground failure, including liquefaction; and (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 by the Uniform Building Code, creating substantial risks to life or property?
- e) have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

#### a) Expose people or structures to the following:

### i. Rupture of a known earthquake fault as delineated by Alquist-Priolo Earthquake Fault Zoning Map or other substantial information?

No Impact. The proposed project site is not located within a State-designated Alquist-Priolo Fault-Rupture Zone (formerly known as a Special Studies Zone), where a potential for major fault rupture could occur (BAGG Engineers, Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California, February 2014).

#### ii. Strong seismic shaking?

Less Than Significant Impact. The proposed site is situated within the San Francisco Bay Area, a region where strong seismic groundshaking could occur during moderate to severe earthquakes, resulting in potentially significant damage. In the vicinity of the project location, there are several major active faults that trend in a northwesterly direction that are of significant concern for a major event. They include the following: (1) Monte Vista Shannon, about 5.3miles to the east with a maximum magnitude of 6.5; (2) San Andreas, about 6.2 miles to the west with a maximum magnitude of 8.05; San Gregorio Connected, about 15.5 miles to the west with a maximum magnitude of 7.0; (4) Hayward-Rodgers Creek, about 11.2 miles to the east; and (5) Calaveras, about 16.4 miles away with a maximum magnitude of 7.02 (BAGG Engineers, Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California, February 2014).

With mandatory conformance to the California Building Code (2010), design standards of the Division of the State Architect for school construction and adoption of the recommendations from the geotechnical report by BAGG Engineers, it is expected that potential for damage to proposed structures from seismic shaking would be reduced to a less than significant level. The new school facilities would be structurally reinforced to withstand the projected maximum seismic event. Plans for the proposed structures would be prepared consistent with the California Building Code and reviewed and approved by the Division of the State Architect. Foundations would be constructed to withstand shaking from a severe earthquake. Fixtures would be bolted to minimize possible injury from falling objects.

#### iii. Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction typically occurs when soils that are loose, coarse and saturated by water or groundwater lose strength and deform as a result of strong groundshaking. According to the State of California Seismic Hazard Zones Map for the Palo Alto Quadrangle, the proposed school site is situated in an area that is susceptible to earthquake-induced liquefaction.

Using data from soils borings of the site, indicating the presence of underlying Holocene alluvial fan levee deposits, groundwater encountered at a depth of about 18 feet and the probable magnitude of a major earthquake within the area, BAGG Engineers determined that liquefaction-related settlement, especially at depths below 23 feet, could occur as the result of a significant seismic event (BAGG Engineers, *Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California*, February 2014). However, wWith implementation of geologic measures incorporated into the proposed project, potential effects from seismic-related ground failure including liquefaction would result in less than significant impacts. Furthermore, the geotechnical findings and the final design would be subject to mandatory review and approval by the Division of the State Architect.

#### iv. Landslides?

*No Impact.* The proposed school site is relatively flat. There are no gulches or other cuts, significant slopes, or steep ground nearby that could allow sliding to occur at the site itself. Furthermore, the geotechnical investigation indicated that the site is not susceptible to landsliding (BAGG Engineers,

Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California, February 2014). Therefore, the potential exposure to landslides is not considered a significant impact.

#### b) Result in soil erosion or the loss of topsoil?

Less Than Significant Impact. The site is located on relatively flat land and the project areas are either paved or overcovered with landscaping so that potential conditions for soil erosion or the loss of topsoil would be minimal. During construction, there would be a relatively low possibility of soil erosion from site preparation activities. As part of the project, measures have been incorporated as part of the project to minimize soil erosion and/or loss of topsoil. Consistent with sound construction practices and regulatory guidelines to be included as part of the SWPPP to be prepared as part of the proposed project for Best Management Practices (BMPs), measures would include, but would not be limited to, the utilization of hay bales for reducing siltation from runoff, timely covering or landscaping, restricting grading to the dry season, and street sweeping. With the development and operation of the new facilities, there would be minimal impacts from soil erosion or loss of topsoil since affected areas would be overcovered by structures, parking lots, and landscaping.

#### c) Located on unstable geologic unit or soil or such instability caused by project?

Less Than Significant Impact. Please see the responses to items VI.a.ii, iii and iv, above, concerning unstable geologic units and the characteristics of site soils.

#### d) Located on expansive soil as defined by the Uniform Building Code?

Less Than Significant Impact. According to the findings from the geotechnical review, stiff to very stiff lean clays and sandy lean clays are present in load-bearing zones as well as moderately expansive clayey soils at shallow depths below the ground surface. Generally, tests indicated that the near surface soils were moderately plastic (soils that would result in differential compaction).

As part of the geotechnical recommendations incorporated into the proposed project, soils would be compacted as part of site preparation along with the use of non-expansive engineered fill to ensure that an adequate foundation would be established for the placement of foundations for the new structures. No significant effects caused by potential expansive soils would occur as part of the proposed project.

#### e) Soils incapable of adequately supporting septic tank or other non-sewer use?

*No Impact.* Wastewater from the proposed project would be collected by connection to existing lines. Septic tanks or other non-sewer systems would not be used.

#### VII. GREENHOUSE GAS EMISSIONS

#### Significance Criteria

Would the project:

- a) generate greenhouse gas emissions, 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 emissions of greenhouse gases?

The Bay Area Air Quality Management District has authority over the reduction of greenhouse gases (GHGs) within its jurisdiction. The BAAQMD has established thresholds of significance for operational-related GHG emissions for various development projects including residential, commercial, industrial and public land uses. The threshold is compliance with a qualified GHG Reduction Strategy or annual emissions of less than 1,100 metric tons of CO2.

#### a) Generate levels of greenhouse gas emissions that would have a significant effect?

*No Impact.* Implementation of the proposed development would not generate greenhouse gas emissions (GHGs), either directly or indirectly, in quantities that would have a significant impact or result in noncompliance with the annual emission of GHGs. Based upon the screening criteria, the new school would be well below the square footage and student attendance threshold criteria.

Nothwithstanding, as part of the proposed project, the design of the school would employ design measures to minimize energy needed for heating and cooling and water requirements. Use of natural light, open space, and energy-efficient materials would be maximized. Low-flow appurtenances would be installed in restrooms and drip irrigation for landscaping would be used to reduce water requirements and associated energy from pumping and transport. Efficient lighting would be provided for safety and security and shielded to minimize off-site glare. Although the enrollment of the proposed project would increase by 45 students versus the current GAIS (which has about 20 more staff than the new school), it is likely that the improved design, construction and energy efficiency of the reconstructed facilities, along with students walking or bicycling to the campus, could significantly reduce emission of GHGs compared to the current school operation.

#### b) Conflict with an applicable plan, policy or regulations for the reduction of greenhouse gases?

*No Impact.* The implementation of the proposed project would not conflict with any applicable plans, policy or regulations for the reduction of greenhouse gases. See the response to item VII.a, above. The development of the educational facilities would be designed and operated to lessen the amount of GHGs, that might otherwise be potentially generated, by adopting design measures and energy efficient equipment to enhance and minimize energy use.

#### VIII. HAZARDS AND HAZARDOUS MATERIALS

### Significance Criteria

Would the project:

- a) create a significant hazard to the public or environment by 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 site 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 projected located in 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 result in a safety hazard for people residing or working on the project site?
- f) for a project within the vicinity of 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 are adjacent to urbanized areas or where residences are intermixed with wildlands?

#### a) Hazard from routine transport, use, and disposal of hazardous materials?

Less Than Significant Impact. A site reconnaissance, conducted as part of the Phase 1 Preliminary Environmental Assessment, and follow-up testing indicated the presence or likely presence of hazardous materials that may include lead from paint, termiticides, arsenic and polychlorinated biphenols (PCBs) at the proposed school location. Based upon the findings, the District entered into an oversight agreement with the California Department of Toxic Substances (DTSC)in April 2014. As part of the agreement, the District's consultant, Terraphase Engineering, Inc., prepared and submitted a Draft Preliminary Assessment (PEA) Work Plan (Terraphase Engineering Inc., Draft Preliminary Endangerment Assessment Work Plan - 275 Elliott Drive - Menlo Park, California 94025, March 24, 2014) to the DTSC for review and approval. Subsequent site investigations indicated that some shallow soil adjacent to the existing building foundation has been impacted with termiticides and that imported base rock beneath the existing asphalt may be affected by low levels of naturally occurring asbestos. A PEA Report will be prepared and submitted to the DTSC, summarizing the soil data results and identifying the estimated extent of the soil impacts.

The District and its consultant will work with the DTSC to determine appropriate and applicable remedial and/or mitigation measures to meet regulatory standards associated with human health and the protection of the environment. Consistent with A.B. 972 for the DTSC School Site Review Process, the District would de-link the CEQA process from the PEA review requirements.

During construction activities, any hazardous materials/wastes would be managed, handled, disposed of, and transported in accordance with local, state, and federal requirements. Upon the opening of the new school, the operation of the facilities would result in an incremental increase in the use of cleaning agents, solvents, paints and other hazardous materials/wastes that are routinely used for maintenance and repairs. Since District staff would be aware of the safe use and disposal of these chemicals and existing District management programs for their handling and use would be applied, no significant impact is expected from the routine use and disposal of these materials.

### b) Hazard resulting from reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment?

Less Than Significant Impact. The project would not create a significant hazard to the public or the environment. During construction, materials such as gasoline and diesel fuels would be routinely managed to avoid spills. Subsequent operation of the facilities would not result in substantial release of hazardous materials/wastes into the environment. Only a small amount of such substances would be used for routine maintenance and repairs consistent with existing District management programs for the safe handling and application of hazardous materials/wastes. Please see item VI.a, above.

A Pacific Gas & Electric 24-inch (365 psi) natural gas pipeline was identified during the Phase 1 Preliminary Environmental Assessment prepared by Terraphase Engineering, Inc along with several smaller (two 3.5 to three 8.625 inch) service pipelines. The 24-line is located within 1,500 feet (1,020 feet to the north) of the proposed school site. To determine the potential hazard to the school, a risk analysis was conducted in accordance with the methodology set forth in the California Department of Education "Guidance protocol for School Site Pipeline Risk Analysis," dated February 2007. Based upon the findings from the analysis, the cumulative Total Individual Risk (TIR) from the total cumulative pipelines for rupture-jet fires was found to be well below the February 2007 criterion for significant risk (less than 1 in 1,000,000) and approximately zero of of 374 people based upon the Population Risk Indicator (Alan Gibbs, Principal Geologist, Terraphase Engineering, Inc. to Ahmad Sheikholeslami, Director of Facilities and Operations, Menlo Park City School District, *Stage II Pipeline Risk Assessment Report, Menlo Park City School District - 275 Elliott Drive, Menlo Park, California*, June 12, 2014.

# c) Emit or handle hazardous/acutely hazardous materials emissions, materials, substances or waste within one-quarter mile of existing or proposed school?

Less Than Significant Impact. For operation of the new facilities, hazardous materials or substances would only be used for routine repair and maintenance activities. Such use would pose a less than significant impact associated with emissions or handling. The school is surrounded by residential lands. Based upon the preliminary records review and findings and from the site studies, no releases of environmental concern (RECs) have occurred within the area of the school. Please see the responses to items VII.a and b, above.

In accordance with Section 21151.8 of CEQA, the Bay Area Air Quality Management District (BAAQMD) was contacted to identify potential sources of hazardous air emissions located within one-quarter mile of the site for the development of the new school. No sources of emissions were present within one quarter mile (Terraphase Engineering, Inc., *Draft Phase I Environmental Site Assessment - 275 Elliot Drive - Menlo Park, California, 94025*, February 7, 2014).

### d) Located on a site included on list of hazardous materials sites or create public/environmental hazard?

Less Than Significant Impact. The proposed project would be implemented within an existing school site. The property is not listed as a hazardous materials site. Please also see the responses to items VII.a and b, above.

#### e) Located within an airport use plan or within two miles of public airport?

*No Impact.* The school site is located within two miles of an airport runway at the Palo Alto Airport of Santa Clara County. Consistent with Section 17215 of the Education Code, the California Department of Transportation, Division of Aeronautics was contacted to determine if the site would provide a level of safety suitable for a school site. Based on its analysis, Caltrans did not find any condition that would create an undue hazard (California Department of Education April 11, 2014 letter to Ahmad Sheikholeslami, Facilities Director, Menlo Park City School District).

#### f) Located within vicinity of a private airstrip?

No Impact. The proposed project site is not located within the vicinity of any known private airstrips.

#### g) Impair or interfere with an adopted emergency response plan or emergency evacuation plan?

*No Impact.* The project would not substantially affect coordination with emergency response or emergency evacuation plans for the area. The City of Menlo works with the County of San Mateo and the Governor's Office of Emergency Services to coordinate emergency response in their jurisdiction. Specific emergency measures relevant to the new school would be provided and would be generally consistent with the existing emergency response/evacuation plans for other schools within the District.

#### h) Expose people or structures to significant risk of wildland fires?

*No Impact.* The proposed project would not expose people or structures to significant risk of wildland fires. It is surrounded by existing urban uses including residences and roadways. In addition, Menlo Park Fire Protection District stations Number 1, with primary service responsibility for service, and Number 2 are located one and a half miles and about five minutes response time from the new campus.

#### IX. HYDROLOGY AND WATER QUALITY

#### Significance Criteria

*Would the project:* 

- 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?
- 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 the alteration 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 stormwater 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 a100-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) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. No water quality standards or waste discharge requirements would be violated by the development of the new facilities. The District would obtain a construction activity stormwater permit as required by the Regional Water Quality Control Board. The permit would address possible contaminants (e.g., sediments) in runoff from the site that could affect water quality during construction. With implementation of control measures such as BMPs as part of the mandatory Stormwater Pollution Prevention Program, no water quality standards would be significantly affected.

The operation of the new school would result in a similar quantity and likely improved quality of runoff from impermeable surfaces as the currently existing conditions. To address water quantity and quality during operation of the new facilities, the District would implement relevant C.3 measures established by the RWQCB and the associated Municipal Regional Permit (e.g., prevention of net increase to offsite stormwater discharge between pre- and post-development; treatment of stormwater runoff) that have been incorporated into the proposed project.

#### b) Substantially deplete groundwater supplies or interfere with groundwater recharge?

Less Than Significant Impact. Development of the project would not significantly deplete any sources of groundwater or interfere with its discharge. The new facilities would be situated within an existing school site of about 6.0 acres that is already partially overcovered with impermeable surfaces along with permeable areas that include the turf playfield, play areas, and landscaping. The current impervious area comprises about 2.98 acres while there are 2.97 acres of pervious area. Post-development would result in a minor change of approximately 2.97 acres of impervious and 2.98 acres of pervious surface.

In accordance with the City of Menlo Park's Permit with the San Francisco Bay Regional Water Quality Control Board National Pollutant Discharge Elimination System (NPDES) Permit (Municipal Regional Permit), C.3 measures for Best Management Practices stormwater management would be implemented to emulate existing drainage characteristics during operation of the new school. Site runoff would be collected, treated and detained on-site through the use of design, source control, and treatment measures including flow-through planters, tree well filters, and natural self-treating turf and landscaping areas. The runoff, which currently flows overland to City right-of-ways, would be discharged by two pump systems to City off-site right-of-ways, one at Elliot Drive and the other at Falk Court. The rate of off-site stormwater discharge would be regulated so that the new school peak runoff quantity would not exceed pre-project levels. Very minimal change would occur to the quantity of any existing runoff and the potential effects upon groundwater recharge and percolation would not be significant.

#### c) Substantially alter existing drainage patterns leading to substantial erosion or sedimentation?

No Impact. Construction activities and operation of the proposed facilities are not expected to result in substantial erosion or sedimentation. As discussed previously (see the responses to items VIII.a and b, above), drainage patterns would not be altered by construction of the project, as the site is relatively flat, and much of the runoff would continue to percolate to the groundwater or would be subsequently recharged. The District would obtain and comply with the construction activity stormwater permit consistent with Regional Water Quality Control Board requirements during construction. Conformance with these requirements, including the implementation of BMPs and other measures to retain runoff onsite and reduction of sediments, would effectively control potential erosion or sedimentation. Implementation of applicable C.3 measures would emulate current runoff conditions. There are no streams or rivers in near or immediate proximity to the proposed project site.

# d) Substantially alter existing drainage patterns leading to substantial increase in rate/amount of surface runoff that would cause on-site or off-site flooding?

*No Impact.* The implementation of the proposed project would not substantially alter existing drainage patterns that would cause on-site or off-site flooding (see response to items VIII.a, b and c, above). Surface runoff from the school site would continue to percolate to the groundwater or would be collected by proposed stormwater drainage facilities for subsequent discharge.

# e) Create or contribute runoff that would exceed capacity of existing drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. The development of the proposed project would not create or contribute runoff that would significantly exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. As discussed in items VIII.a, b and c, above, drainage from the site would not substantially change from existing conditions with the development of new facilities for stormwater collection, treatment, and retention. While urban contaminants from development of more parking within the campus could add to the existing on-site pollutants, the total amount of contaminants would not substantially change, despite the 45 student increase at the new school compared to the GAIS enrollment. Contaminants may decrease due to the fewer number of staff (the GAIS has about 20 more employees) and lower number of motor vehicles coming to the school as a result of the relatively large number of students who are expected to walk or ride bicycles. In addition, the proposed stormwater drainage facilities would be required to treat runoff prior to discharge from the school site.

A small amount of additional fertilizers and other chemicals, could result from maintenance of the larger field. However, the quantity would be relatively small and would continue to manage and apply such materials in accordance with manufacturers' guidelines to minimize impacts to the extent practicable.

#### f) Otherwise substantially degrade water quality?

Less Than Significant Impact. Please see the responses to items VIII.a, b and e, above.

## g) Place housing within 100-year flood hazard area (as mapped on federal Flood Hazard Boundary, Flood Insurance Rate Map, or other delineated map)?

No Impact. No housing is proposed as part of the school project. According to the City of Menlo Park General Plan, the site is not within the 100-year flood zone as defined by Federal Emergency Management Agency insurance maps (City of Menlo Park, City of Menlo Park General Plan - Background Report, adopted November 30 and December 1, 1994). In addition, information from the geotechnical investigation further indicates that the Flood Insurance Rate Maps prepared by the Federal Emergency Management Agency (2012) verify that the site is within Zone X, defined as "areas determined to be outside the 0.2 percent annual chance [500 year] floodplain" (BAGG Engineers, Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School - 275 Elliot Drive - Menlo Park, San Mateo County, California, February 2014).

#### h) Place structures within 100-year flood hazard area that would impede or redirect flood flows?

*No Impact.* Please see the responses to items VIII.c, d, and g, above.

## i) Expose people or structures to significant risks from flooding as a result of levee or dam failure?

Less Than Significant Impact. There are no major dams or large bodies of water located upstream of the project site that would pose a significant risk from flooding as a result of failure.

#### j) Inundation by seiche, tsunami, or mudflow?

*No Impact.* The project site is located inland from the southern portion of San Francisco Bay and the Pacific Ocean so that impacts from a tsunami are highly unlikely. The elevation of the site is approximately 35 to 37 feet above sea level (msl). Information from the geotechnical investigation, based upon inundation maps for the Redwood Point and Palo Alto quadrangles in 2009 developed through collaboration of several agencies including the California Emergency Management Agency, indicate that the new school location is situated outside areas that may be inundated by a tsunami.

No effect from seiche flooding would occur since there are no large bodies of water, such as a lake, in proximity to the project site. The school site is in an urbanized area on relatively level terrain. Development, including overcovering of much of the school site and surrounding area and the flat topography would preclude the possibility of a mudflow.

#### V. LAND USE AND PLANNING

#### Significance Criteria

*Would the project:* 

- 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) Physically divide an established community?

*No Impact.* The project would not physically divide an established community. The proposed project would be located within an existing school district.

#### b) Conflict with land use plan, policy or regulation of jurisdictional agency?

*No Impact*. The project site is consistent with the City's land use designation and zoning classification. The site is owned by the District, which is responsible for provision of adequate public school facilities.

#### c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

*No Impact.* The project site would be located within an existing school site. There are no habitat conservation or natural community conservation plans that are applicable to the property.

#### XI. MINERAL RESOURCES

#### Significance Criteria

Would the project:

- 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) Loss of known mineral resource of regional and State value?

*No Impact.* The proposed project would be implemented within an existing school site. Alluvial soils underlie the property and there are no known minerals of significant regional and State value.

#### b) Loss of locally important mineral resource site delineated in local plan?

*No Impact.* There are no known locally significant minerals and the existing school site is not designated as a mineral resource site in the City General Plan.

#### XII. NOISE

#### Significance Criteria

Would the project result in:

- 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?
- b) exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- c) 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 within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

The City of Menlo Park has set forth noise standards that are based upon the State of California Department of Health Services (DHS) Office of Noise Control criteria that have been adopted by many communities throughout the State. The DHS has established four categories of community noise exposure (Ldn or CNEL [see definitions below]) for judging the severity of noise intrusion and compatibility for specific land uses: (1) Normally Acceptable; (2) Conditional Acceptable (with some exposure mitigation); (3) Normally Unacceptable (severe noise); and (4) Clearly Unacceptable (severe and not mitigable).

Within the project area, uses generally include single-family residences, and the existing school. Following are the standards for the two land uses:

<u>Single-family residential</u>, exterior noise is normally acceptable up to 60 Ldn or below, conditionally acceptable between 60 and 70 dBA, normally unacceptable between 70 to 75 dBA, and clearly unacceptable above 75 dBA.

<u>Schools, libraries, churches, hospitals,</u> noise intrusion areas is normally acceptable to 60 dBA and conditionally acceptable from 60 to 70 dBA, normally unacceptabl between 70 and 80 dBA, and clearly unacceptable beyond 80 dBA.

The City has established a Noise Ordinance (Chapter 8.06.050) with exemptions that allow construction of State projects during the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday.

<u>A-weighting</u> (the "A" in dBA) is used in sound level meters to filter out extreme high and low frequencies, so as to measure a representative sound level corresponding to the response of the human ear.

<u>Decibel (dB)</u> is a measure, representing one-tenth of a bell on a modified logarithmic scale that serves as a basis for measuring the relative loudness of sounds. It is approximately equal to the small degree of difference of loudness ordinarily detectable to the human ear. dBA is defined as a unit, in decibels, for measuring a noise level after a sound has been A-weighted. A measurement of 50 dBA would result from normal conversation. Typical auto traffic on heavily travelled city streets could range upward to about 70 dBA at 70 feet. A sonic boom could cause noise up to 140 decibels.

<u>Ldn</u>, the day-night average noise level, is a 24-hour average with a ten dBA "penalty added to noise during the hours of 10 p.m. to 7 a.m. to account for the greater nocturnal noise sensitivity of people.

#### a) Exposure to or generation of noise levels in excess of established standards?

Less Than Significant Impact. Within the current environmental setting, the existing single-family residences within the area are considered noise-sensitive land uses. Current noise levels would generally range from below 45 dBA (e.g., very light traffic noise or the level of soft music inside a residence) within the interior of the school when indoor classes are in session to over 75 dBA from intermittent outdoor recreational activities. Traffic along Elliot Drive at the school entry would generate levels of generally less than up to 60 dBA (Ldn) based upon expected levels for single-family land uses and results of measurements contained in the City of Menlo Park General Plan.

Intermittent levels of 60 to 75 dBA could occur during pick-up/drop-off activity at the GAIS in the morning and afternoon peaks that may last for about 20 to 30 minutes each. Existing exterior noise at adjacent residences would typically be below 60 dBA with interior noise generally ranging from 40 to 50 dBA. The 24-hour dBA is unlikely to exceed 45 to 50 dBA given the residential uses surrounding the school. There are no sources (e.g., railyard, industrial plant) of excessive noise within the area.

Generally, a change in noise level of less than three dBA (decibels, weighted average) is not evident to most people. An average increase of from three to five dBA is clearly audible to most individuals while five dBA or greater is readily apparent. Loud noise during evening and early morning hours (i.e., 10 p.m. to 7 a.m.) accounts for the period of greatest sensitivity for most people. Noise is substantially attenuated by distance and by windows and insulated structures. A doubling of distance typically results in a noise reduction of about six decibels.

Noise generated by the proposed project would include short-term construction noise and long-term operational noise. Construction activities would cause the highest level of potential noise. Temporary and intermittent noise would occur from equipment and vehicle use. Within 50 feet of the noisiest sources, noise levels from construction activities (e.g., use of mechanical equipment) associated with the development of the structures could range up to 75 to 91 decibels (average-weighted or dBA for equipment without noise controls) and about 75 to 80 dBA for equipment with feasible noise controls (Bolt, Beranek and Newman/U.S. Environmental Protection Agency, *Noise from Construction Equipment and Operations*, December 31, 1971). The use of pneumatic tools (e.g., jackhammers, earthmoving equipment) would generally result in the highest noise levels, which would occur before exterior walls are put up to help buffer noise. The level of noise would be substantially attenuated by distance. At about 50 feet, noise levels from heavy equipment (e.g., compactors, jackhammers, bulldozers, excavators) could range to a maximum of 85 to 90 dBA. Outdoor noise levels at 100 feet could be reduced to approximately 70 to 75 dBA by the use of equipment with feasible noise controls.

Areas around the proposed site with the greatest potential sensitivity to construction noise would be located in proximity to the location of the proposed two-story structure. They would include eight to ten single-family residences beyond the northwest/north corner of the school (in which the backs of houses are set back from the project site boundary), a residence at the western entry on Elliot Drive, and two to three residences nearest to the multi-use building. At the northwest/north location, the two-story structure would be within about 25 feet of the closest residential property line and over 27 feet from the property line of the Elliot Drive residence. The distance from the perimeter fence (i.e. the boundary between the school and nearest residential property line) to the multi-use building would be almost 27 feet with the houses set further back toward Oak Court.

Construction noise, though discernible, would be temporary and intermittent during the approximately 13-month total construction period of the project. High-noise activities (e.g., grading and foundation work) would tend to occur during the early phases of development. After the outside shell of the structure has been erected, noise levels would be significantly lessened since most activities would occur inside the uncompleted building. The construction period for the parking lot is expected to be relatively short given the relatively small size of the facility.

As part of the proposed project, excessive construction noise would be minimized to the extent possible and practicable by the use of equipment with noise controls, location of stationary noise-generating equipment as far as possible from existing residences, attenuation by the partially finished structure as a noise buffer previously mentioned, above, and prohibition of unnecessary idling of internal combustion engines, and other feasible measures. Residents would be notified beforehand prior to initiation of particularly noisy activities. Construction activities would conform with the hours set forth in the City of Menlo Park Noise Ordinance (Chapter 8.06.050) that limits hours to 8:00 a.m. to 6:00 p.m. Monday through Saturday. Existing residential exteriors, windows, and insulation and the setback of the actual residences would further help reduce construction noise.

Post-construction operation of the new school facilities would not cause exceedance or violation of established noise standards. The enrollment of the school would be similar to the existing GAIS and future noise may decrease as a result of a lower staffing level, less motor vehicle traffic at the site, use of more efficient and less noisy HVAC equipment, and improved building materials and design.

#### b) Exposure or generation of excessive groundborne vibration or noise levels?

Less Than Significant Impact. Development of the proposed project would not result in excessive groundborne vibration or noise levels. Excavation and foundation work would be relatively shallow (generally no more than eight to ten feet below the ground surface). There may be relatively minor vibration from the use of trucks or grading equipment during construction activities. However, noise generated by such equipment would be intermittent, short-term, and generally restricted to daytime hours. Please see item XI.a, above, about noise levels.

#### c) Substantial permanent increase in ambient noise levels caused by the project?

*No Impact.* Enrollment of the future school would substantially differ from the current the same as the currently existing conditions with the implementation of the proposed project. No discernible permanent increase in noise would occur and may decrease. See the response to item XI.a, above.

#### d) Substantial temporary or periodic increase in ambient noise levels?

Less Than Significant Impact. Temporary noise from construction activities associated with the new project would occur. The levels would be elevated compared to existing ambient noise at the site. However, construction noise would be limited to the approximately 13-month building period of the proposed facilities. Construction noise would consistent with the Noise Ordinance of the City of Menlo Park and therefore not considered significant. Please see the responses to items XI.a and XI.c, above.

### e) Located within adopted airport land use plan or two miles of public airport?

*No Impact*. The proposed project site is not located in an adopted airport land use plan area. The site is within two miles of the runway of a public airport, the Palo Alto of Santa Clara County facility. The orientation of the runways and flight paths do not typically involve overflights of the school location.

### f) Within vicinity of a private airstrip?

No Impact. The proposed project is not located within the vicinity of a known private airstrip.

#### XIII. POPULATION AND HOUSING

#### Significance Criteria

Would the project:

- a) induce substantial population growth in an area, either directly e.g., new homes and businesses) or indirectly (e.g., road extensions or other infrastructure?
- b) displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- c) displace substantial number of people, necessitating the construction of replacement housing elsewhere?

#### a) Induce substantial direct or indirect population growth in an area?

*No Impact.* The proposed project would not induce substantial direct or indirect population growth in the area. The project is intended to respond to already present and projected student growth within the District's attendance boundaries and to accommodate already increased enrollment.

#### b) Displace substantial numbers of existing housing?

*No Impact.* The proposed project would not displace any existing housing.

#### c) Displace substantial numbers of people?

No Impact. The development of the project would not result in displacement of any individuals.

#### XI. PUBLIC SERVICES

#### Significance Criteria

Would the project result in substantial adverse physical impacts associated with the provision of or need for new or physically altered governmental facilities or substantial alteration to existing governmental facilities, the construction of which could cause significant environmental impacts, to maintain acceptable service rations, response times or other performance objectives for any of the following public services?

## a) Substantial physical impacts associated with provision of new or physically altered governmental facilities to maintain acceptable service for following:

#### Fire protection?

No Impact. The proposed reconstruction and expansion of the school would not result in a significant effect upon the provision of fire protection services. The Menlo Park Fire Protection District (MPFPD) provides fire services for the City of Menlo Park, including the school site, along with other nearby communities. The existing Menlo Park Fire Protection District Station #1, located on Middlefield Road, would have primary responsibility for fire services at the project site. Both this station and MPFPD Station #2, at 2290 University Avenue in East Palo, are both 1.5 miles and five minutes response time away from the new school location. According to the City General Plan, the fire services would be adequate to serve the community, including the school.

As part of the proposed project, specific measures would be incorporated to further address fire protection. They include design and construction of the project consistent with the requirements of the Division of the State Architect, the State Fire Marshall, and the California Building Code (2010). Fire sprinklers would be installed in the new structure.

#### Police Protection?

*No Impact.* The need for additional police protection services and equipment would not be affected at the proposed project. The new school, which would have an increased enrollment of 45 students compared to the current GAIS attendance, would continue to be secured by the City of Menlo Park Police Department located at 701 Laurel Street. To provide further on-site security, project-specific measures would include low-level lighting and alarms for security and safety. During construction, signage and fencing would minimize possible trespassing and need for police services.

#### Schools?

*No Impact.* The proposed project is the construction of educational facilities to adequately accommodate present and future enrollment within the District at an already existing school site. Compared to the existing GAIS, attendance levels at the new school would not significantly increase.

#### Parks?

*No Impact.* The development of the project would have no direct impact upon any existing park facilities since the proposed educational facilities are intended to provide educational facilities to accommodate future enrollment at the District. The existing playfield at the school site would continue to be used by the Little League and AYSO and available to the public during non-school hours.

#### Other public facilities?

*No Impact.* There would be no substantial impacts from the project upon any other known public facilities or services.

#### XV. RECREATION

#### Significance Criteria

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility 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) Increase use of existing parks and other recreational facilities that would cause substantial physical deterioration to occur or be accelerated?

Less Than Significant Impact. The existing two tennis courts and the preschool play area at the GAIS would be removed as part of the proposed project while the new playfield and hardcourt areas would be expanded along with the addition of an outdoor area at the northwest corner of the site. Loss of the tennis courts could increase use of other existing tennis and preschool play facilities within the community that could result in the occurrence of relatively minor physical deterioration.

## b) Would project include recreational facilities construction or expansion that would cause substantial physical impacts?

*No Impact.* Other than the loss of the two tennis courts and preschool play area, the proposed project would include the expansion of school recreational facilities that would generally result in a net benefit. No impact associated with substantial physical impacts would occur. See item XIV.a, above, about the removal of part of the existing recreational facilities.

#### XVI. TRANSPORTATION/TRAFFIC

#### Significance Criteria

Would the project:

- 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) 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 following are the significance criteria per the City of Menlo Park's Transportation Impact Analysis Guidelines:

- 1. A Project is considered to have a potentially "significant" traffic impact if the addition of project traffic causes an intersection on a collector street operating at LOS "A" through "C" to operate at an unacceptable level (LOS "D", "E" or "F") or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first. A potential "significant" traffic impact shall also include a project that causes an intersection on arterial streets or local approaches to State controlled signalized intersections operating at LOS "A" through "D" to operate at an unacceptable level (LOS "E" or "F") or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first.
- 2. A project is also considered to have a potentially "significant" traffic impact if the addition of project traffic causes an increase of more than 0.8 seconds of average delay to vehicles on all critical movements for intersections operating at a near term LOS "D" through "F" for collector streets and at a near term LOS "E" or "F" for arterial streets. For local approaches to State controlled signalized intersections, a project is considered to have a potentially "significant" impact if the addition of project traffic causes an increase of more than 0.8 seconds of delay to vehicles on the most critical movements for intersections operating at a near term LOS "E" or "F".
- a) Conflict with applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system for all modes of transportation and relevant components?

Less Than Significant Impact. Based upon applicable standards for the operation of the circulation system and its components, there would be a less than significant impacts that would result from the implementation of the school reconstruction. An Existing plus Project Traffic Analysis was prepared for the proposed project, and has been included as Appendix A. The purpose of that analysis was to provide traffic-related project information to determine whether further traffic analyses of off-site intersections and roadway segments are warranted, and whether the proposed project would have the potential to create any significant traffic impacts. The traffic analysis has been prepared in accordance with the City's Transportation Impact Analysis Guidelines. Based on review of the Technical Memorandum and subsequent meetings with City staff, the City has determined that further traffic analyses beyond the Existing plus Project condition was not warranted, and no significant traffic impacts would occur.

#### **Existing Site Location and Study Area**

The proposed O'Connor School Site would replace the existing German American International School (GAIS) located at 275 Elliot Drive in the City of Menlo Park. The proposed project is the replacement of an existing 315 student private school (pre-school to grade 8), the German American International School (GAIS), with a 360 student public school (grades 3-5) that would primarily serve the surrounding neighborhoods. A majority of the students of the proposed school would be relocated from two other District schools further to the west of the project site: Encinal School and Laurel School.

Strategically, the location of the proposed school would provide for a new school for the District between Willow Road, the Bayshore Freeway (US 101), and Woodland Avenue.

Based on coordination with City staff, below is a list of the study area intersections and their traffic control:

Table XVI-1. Study Area Intersections and Traffic Control

Intersection	Traffic Control
Ravenswood Avenue/Middlefield Road	signalized
Ravenswood Avenue/Muddened Road     Ringwood Avenue/Bay Road	all-way stop
3. Ringwood Avenue/Coleman Avenue	1-way stop on Coleman Ave
4. Ringwood Avenue/Middlefield Road	signalized
5. Willow Road/Bay Road	signalized
6. Willow Road/Chester Street	1-way stop on Chester St
7. Willow Road/Durham Street	signalized
8. Willow Road/O'Keefe Street	1-way stop on O'Keefe St
9. Willow Road/Coleman Avenue	signalized
10. Willow Road/Gilbert Avenue	signalized
11. Willow Road/Middlefield Road	signalized
12. Menalto Avenue/Durham St-Donohoe St	2-way stop on Durham-Donohoe St
13. Menalto Avenue/O'Keefe Street	all-way stop
14. Menalto Avenue/O'Connor Street	all-way stop
15. Menalto Avenue/Elm Street	all-way stop
16. Menalto Avenue/Oak Court	1-way stop on Oak Ct
17. Menalto Avenue/Gilbert Avenue	all-way stop
18. Menalto Avenue/Woodland Avenue	all-way stop
19. Woodland Avenue/Middlefield Road	1-way stop on Woodland Ave
20. Elliot Drive/O'Connor Street	1-way stop on Elliott Dr
21. Byers Drive/O'Connor Street	1- way stop on Byers Dr
22. Oak Court/Woodland Avenue	1-way stop on Oak Ct
23. University Avenue/Woodland Avenue	signalized

#### **Existing Traffic Conditions without Proposed Project**

#### Roadways

Regional access to the project vicinity is provided by Willow Road and University Avenue, which provides access to US 101 via freeway interchanges. Local access is provided via Menalto Avenue, O'Connor Street, and Elliot Drive. The following describes the existing roads in the study area.

#### Willow Road

Willow Road provides regional access to the project site via its intersections with Gilbert Avenue, O'Keefe Street, and Durham Street, which all connect to Menalto Avenue, then O'Connor Street, and

Elliot Drive. Willow Road also has an interchange with US Highway 101 (US 101), and is a major north-south roadway that runs through the northern portion of the City. In the project vicinity, it is a two-lane divided collector road between Middlefield Road and US 101, with a painted and landscaped median. On-street parking is permitted on the east side of the roadway only, while a Class II (striped) bicycle lane exists on both sides of the roadway. Based on May 2012 traffic counts, the average daily traffic (ADT) on Willow Road, between Middlefield Road and Gilbert Avenue is 26,200 ADT, and 28,000 ADT between Coleman Avenue and Durham Street.

#### Menalto Avenue

Menalto Avenue provides local access to the project site via its intersection O'Connor Street, which connects to Elliot Drive. Menalto Avenue is a residential collector street that travels in a north-south direction through The Willows neighborhood, it begins at Haight Street to the north, and terminates at its intersection with Woodland Avenue to the south. In the project vicinity, it is a two-lane undivided street with on-street parking permitted on both sides of the roadway. Based on mid-November 2013 traffic counts, the ADT on Menalto Avenue, between Woodland Avenue and Oak Court is 2,800 ADT; and, 2,600 ADT between Oak Court and O'Connor Street.

#### Elliott Drive

Elliott Drive provides direct access to the project site. The project site is the southeastern terminus of Elliott Drive. It is a residential street that serves approximately 23 single-family homes. Vehicular access to/from Elliott Drive occurs at its intersection with O'Connor Street via an unsignalized intersection where stop control is on the Elliott Drive approach. In the project vicinity, it is a two-lane undivided street with onstreet parking permitted on both sides of the roadway. Based on mid-November 2013 traffic counts, the ADT on Elliott Drive is 910 ADT.

#### Traffic Volumes

Weekday morning a.m. peak hour traffic counts were either collected in early November 2013 during a typical weekday while adjacent schools were in session, or were provided by the City from the May 2012 city-wide biannual traffic counts. Figure 5 illustrates the existing weekday a.m. peak hour traffic volumes. Appendix A, *Technical Memorandum – Existing plus Project Traffic Analysis for O'Connor Elementary School Site* (Arch Beach Consulting, January 14, 2014), contains the raw peak hour traffic volumes of the traffic analysis.

#### Levels of Service

Based on the City's analysis methodology, the existing a.m. peak hour traffic volumes were input into the Traffix LOS software to determine the existing intersection delay (in seconds) values. Since traffic that is related to the drop-off/pick-up operations of schools occurs during a short period of time (15 to 30 minutes) during the a.m. (and after-school) peak hour, the "peak hour factor" (PHF) was adjusted in all of the LOS analyses to their actual field calculated PHF to account for the unique traffic peaking characteristics (i.e., the lower the PHF, the higher intensity of traffic within the peak 15 minutes of the peak hour). Table XVI-2 presents the results of the existing intersection LOS analysis, while the LOS calculation sheets are provided in Appendix A.





Source: Arch Beach Consulting

Figure 5

Existing Weekday AM Peak Hour Volumes

Table XVI-2. Existing 2013 Intersection Level of Service Summary

	Traffic	Existing Condition		
Intersection	Control	Delay	LOS	
1. Ravenswood Ave/Middlefield Rd <sup>1</sup>	signal	76.2	E	
2. Ringwood Ave/Bay Rd <sup>2</sup>	all-way stop	28.6		
3. Ringwood Ave/Coleman Ave <sup>2</sup>	1-way stop	19.1	С	
4. Ringwood Ave/Middlefield Rd <sup>1</sup>	signal	22.0	С	
5. Willow Rd/Bay Rd <sup>1</sup>	signal	15.5	В	
6. Willow Rd/Chester St <sup>2</sup>	1-way stop	25.1	D	
7. Willow Rd/Durham St <sup>1</sup>	signal	11.9	В	
8. Willow Rd/O'Keefe St <sup>2</sup>	1-way stop	77.7	F	
9. Willow Rd/Coleman Ave <sup>1</sup>	signal	15.8	В	
10. Willow Rd/Gilbert Ave <sup>1</sup>	signal	12.3	В	
11. Willow Rd/Middlefield Rd <sup>1</sup>	signal	66.4	E	
12. Menalto Ave/Durham-Donohoe St <sup>2</sup>	2-way stop	10.9	В	
13. Menalto Ave/O'Keefe St <sup>2</sup>	all-way stop	8.9	A	
14. Menalto Ave/Walnut-O'Connor St <sup>2</sup>	all-way stop	12.2	В	
15. Menalto Ave/Elm St <sup>2</sup>	all-way stop	7.9	A	
16. Menalto Ave/Oak Ct <sup>2</sup>	1-way stop	10.4	В	
17. Menalto Ave/Gilbert Ave <sup>2</sup>	all-way stop	8.5	A	
18. Menalto Ave/Woodland Ave <sup>2</sup>	all-way stop	8.8	A	
19. Woodland Ave/Middlefield Rd <sup>2</sup>	1-way stop	24.5	С	
20. Elliott Dr/O'Connor St <sup>2</sup>	1-way stop	17.0	C	
21. Byers Dr/O'Connor St <sup>2</sup>	1-way stop	11.2	В	
22. Woodland Ave/Oak Ct <sup>2</sup>	1-way stop	10.7	В	
23. University Ave/Woodland Ave <sup>2</sup>	signal	50.9	D	

#### Notes:

Delay show in "seconds per vehicle" per the *Highway Capacity Manual* (HCM).

**BOLD** values indicate unsatisfactory LOS D, E, or F conditions.

Based on the table, the following intersections are currently operating with unsatisfactory LOS (LOS D, E, or F):

<sup>&</sup>lt;sup>1</sup> Existing traffic counts from mid-May 2012 provided by City of Menlo Park.

<sup>&</sup>lt;sup>2</sup> Existing traffic counts collected in early-November 2013.

- 1. Ravenswood Avenue/Middlefield Road (LOS E with 76.2 seconds of delay)
- 2. Ringwood Avenue/Bay Road (LOS D with 28.6 seconds of delay)
- 6. Willow Road/Chester Street (LOS D with 25.1 seconds of delay)
- 8. Willow Road/O'Keefe Street (LOS F with 77.7 seconds of delay)
- 11. Willow Road/Middlefield Road (LOS E with 66.4 seconds of delay)
- 23. University Avenue/Woodland Avenue (LOS D with 50.9 seconds of delay)

#### **Project Traffic**

#### Trip Generation

Weekday daily and a.m. peak hour trip generation estimates for the proposed school (360 students) and the relocated students from the existing schools (Encinal and Laurel schools) were developed using trip rates provided in the Institute of Transportation Engineers (ITE) *Trip Generation*, 9th Edition. Trip generation estimates for the existing GAIS were provided from the Final Report – Traffic Study for the Proposed German American International School Expansion prepared by TJKM Transportation Consultants in January 2012. The trip rates in the GAIS traffic study were developed based on trip generation studies of the existing operations at GAIS.

Current student demographic data for the students of Encinal and Laurel schools was provided by the District. Grade 3 students from Laurel School, and grades 4-5 students from Encinal School would be relocated to the proposed school. The street addresses of those students were mapped, and approximately 90 students from Laurel School and 197 students from Encinal School, for a total of 287 students, would be relocated to the O'Connor School site. Summaries of the trip generation rates and resulting vehicle trips for the proposed project are presented in Table XVI-3.

According to the table, the proposed project would generate approximately 464 daily trips and 162 a.m. peak hour trips (89 inbound and 73 outbound). The GAIS currently generates 920 daily trips and 249 a.m. peak hour trips (137 inbound and 112 outbound). Once the proposed project replaces the GAIS, there would be net 456 *less* daily trips and 87 *less* a.m. peak hour trips generated by the proposed project. In addition, there would be 370 daily trips and 130 a.m. peak hour trips diverted from Laurel and Encinal schools to the proposed project.

#### Trip Distribution and Assignment

Trip distribution percentages for the new trips generated by the proposed project, and the existing trips to/from Laurel and Encinal schools were based on the student demographic data provided by the District. Trip distribution percentages for the GAIS were provided in the January 2012 TJKM traffic study. The trip assignments for each school were determined based on applying the trip distribution percentages to their respective trip generation. Adjustments were made to the trip assignments for those students who live relatively close to their school (i.e., within walking distance).

**Table XVI-3. Trip Generation Estimates** 

	Size/Units		Weekday AM Peak Hour		
Land Use		Daily	In	Out	Total
TRIP RATES					
Elementary School (ITE Code 520) <sup>1</sup>	per student	1.29	0.25	0.20	0.45
Private School (TJKM Study, 2012) <sup>2</sup>	per student	2.92	0.43	0.36	0.79
TRIP GENERATION					
O'Connor Site ES - Grades 3-5	360 students	464	89	73	162
German-American School (private)	315 students	-920	-137	-112	-249
NET TRIP GENERATION		-456	-48	-39	-87
DIVERTED (RE-DISTRIBUTED) TRIPS					
Laurel Elementary School - Grade 3 <sup>3</sup>	90 students	116	23	18	41
Encinal Elementary School - Grades 4-5 <sup>3</sup>	197 students	254	49	40	89
TOTAL DIVERTED TRIPS		370	72	58	130

Notes: <sup>1</sup> Trip rates based on *Trip Generation*, 9th Edition, Institute of Transportation Engineers (ITE), 2012.

Figure 6 presents the trip distribution for the proposed project. Figures 7 presents the trip distribution for the GAIS. Trips from the GAIS would be removed from the study area with implementation of the proposed project. Figure 8 presents the trip distribution for Encinal School. Figure 9 presents the trip distribution for Laurel School. The trips from Encinal and Laurel schools would be diverted to the proposed project. For purposes of the traffic analysis, those trips were removed from the study area, then added back as part of the trip assignment from the proposed project. Figure 10 provides the trip assignment of all schools combined.

#### **Existing plus Project**

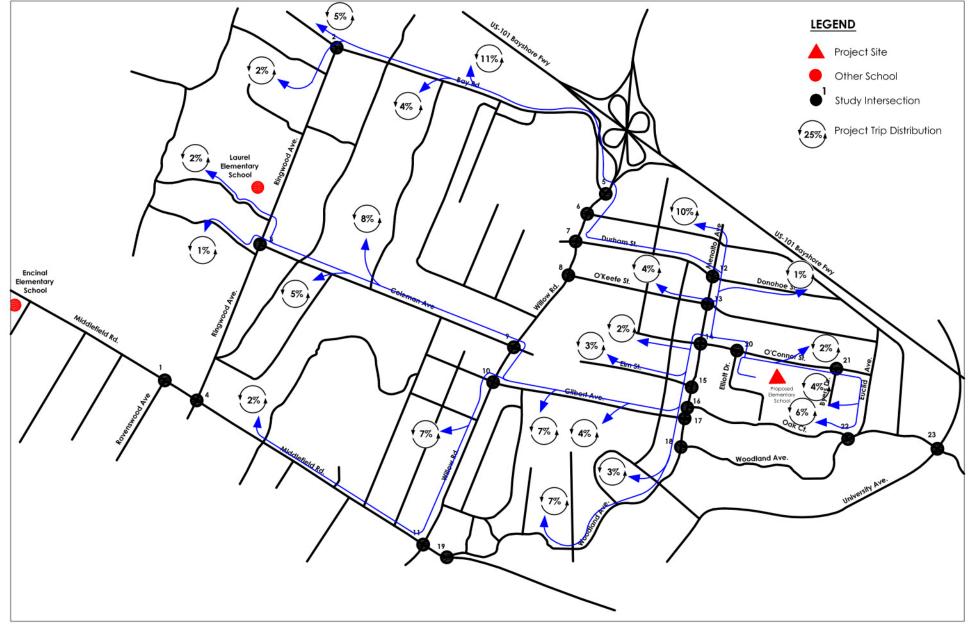
Each trip assignment for the proposed project, the GAIS (removed trips), Encinal School (diverted trips), and Laurel School (diverted trips) were added to the existing traffic volumes to derive the Existing plus Project condition, and the project impacts on the circulation system were analyzed. This scenario would determine project-specific impacts and mitigation measures (if required).

Traffic Volumes

Figure 11 illustrates the Existing plus Project weekday a.m. peak hour traffic volumes.

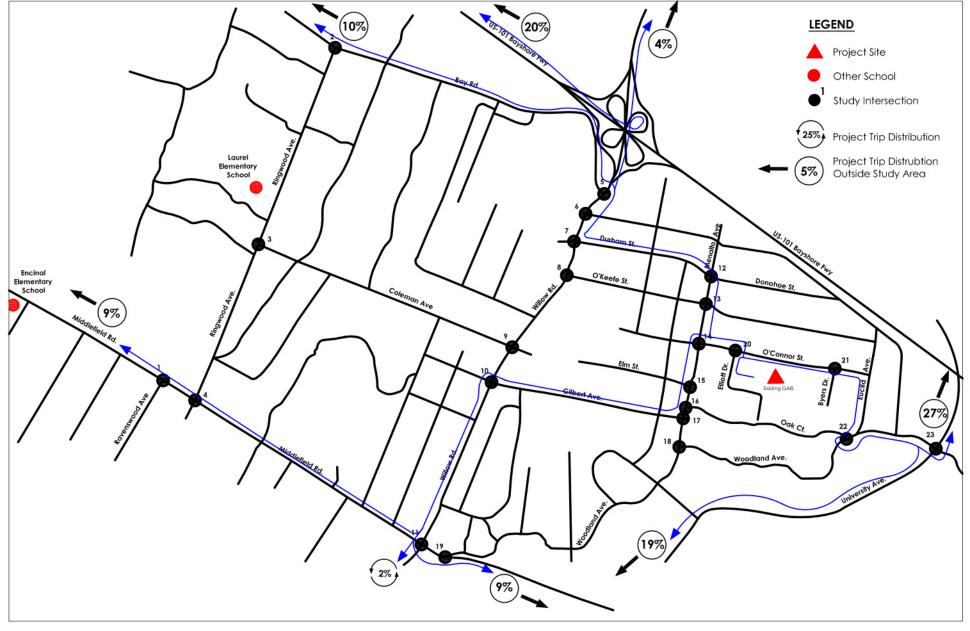
<sup>&</sup>lt;sup>2</sup> Trip rates based on *Final Report - Traffic Study for the Proposed German American International School Expansion*, TJKM Transportation Consultants, January 18, 2012.

<sup>&</sup>lt;sup>3</sup> Number of students in Grades 3 - 5 to be diverted to O'Connor Site Elementary School based on demographic data provided by the Menlo Park City School District, November 2013.



Not To Scale North

Figure 6
O'Conner School Site Trip Distribution

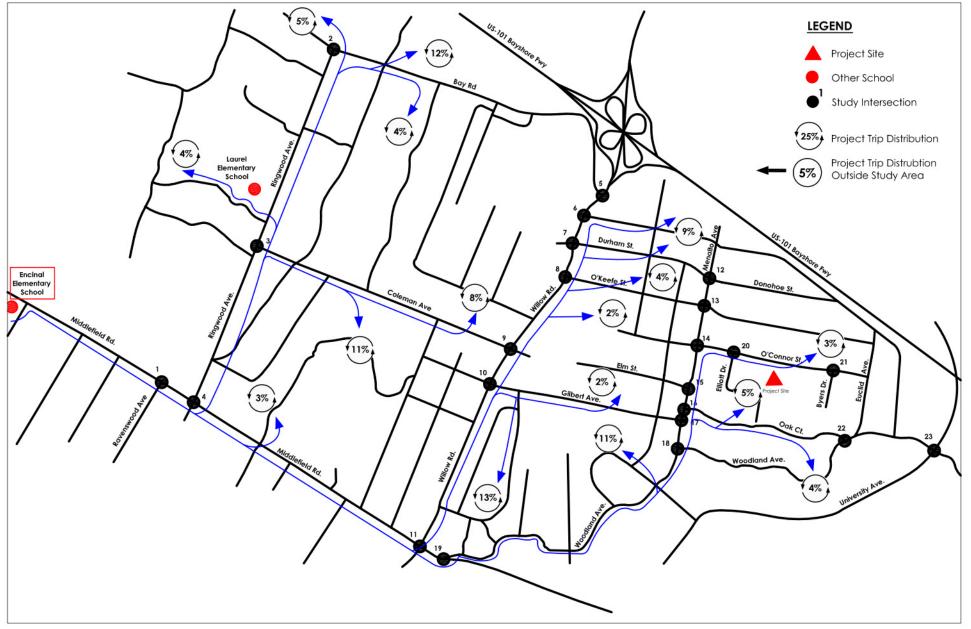


Not To Scale North

Source: Arch Beach Consulting

Figure 7

German American International School Trip Distribution

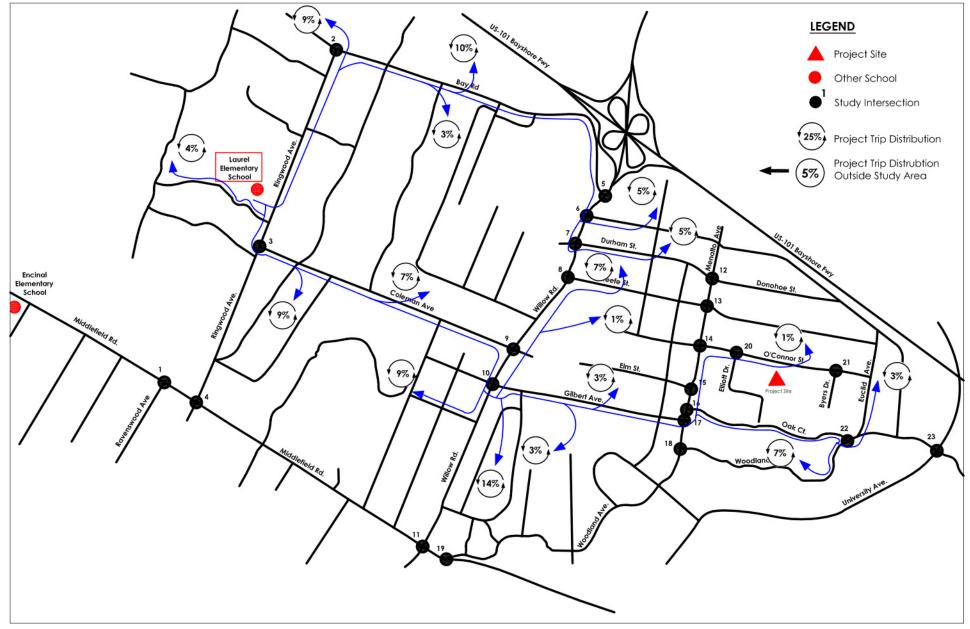


Not To Scale North

Source: Arch Beach Consulting

Figure 8

Encinal School Trip Distribution

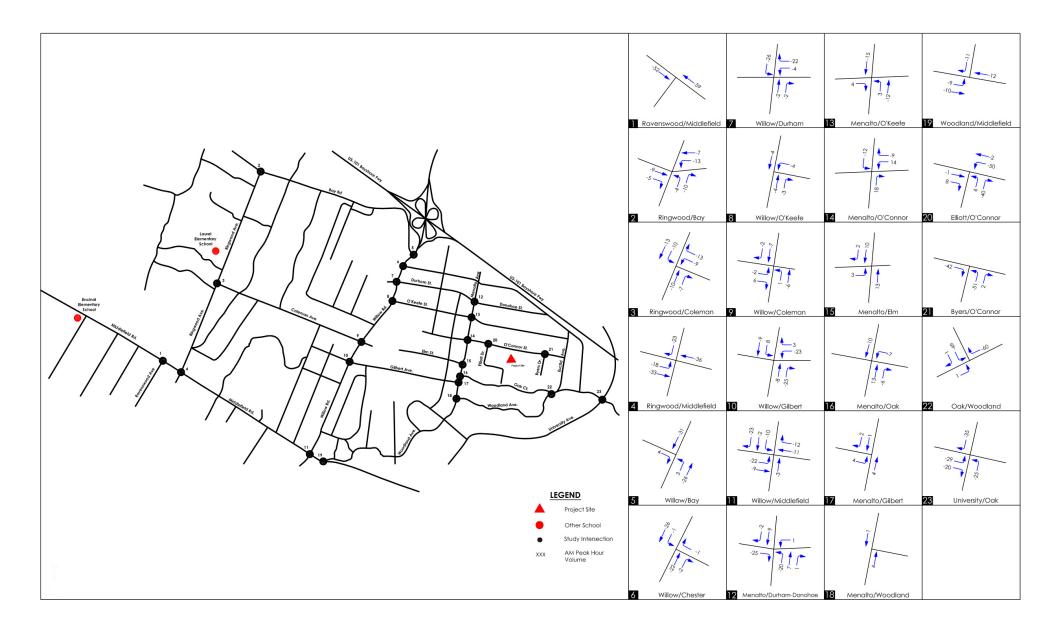


Not To Scale North

Source: Arch Beach Consulting

Figure 9

Laurel School Trip Distribution





Source: Arch Beach Consulting

Figure 10

Combined Schools Trip Assignment





#### Levels of Service

Existing plus Project traffic volumes counts and existing field calculated peak hour factors (PHF) were input in Traffix (version 8) LOS software to determine the existing levels of service (LOS). Table XVI-4 also provides results of the Existing plus Project LOS analysis. Appendix A contains the LOS calculation sheets.

Table XVI 4. Existing plus Project Level of Service Summary

		Weekday AM Peak Hour					
	Traffic	Existing		Existing + School			
Intersection	Control	Delay	LOS	Delay	LOS	Difference	Impact?
1. Ravenswood Ave/Middlefield Rd $^{\rm 1}$	signal	76.2	E	70.0	D	-6.2	no
2. Ringwood Ave/Bay Rd <sup>2</sup>	all-way stop	28.6	D	23.1	С	-5.5	no
3. Ringwood Ave/Coleman Ave <sup>2</sup>	1-way stop	19.1	C	15.9	В	-3.2	no
4. Ringwood Ave/Middlefield Rd <sup>1</sup>	signal	22.0	С	21.5	C	-0.5	no
5. Willow Rd/Bay Rd <sup>1</sup>	signal	15.5	В	15.7	В	0.2	no
6. Willow Rd/Chester St <sup>2</sup>	1-way stop	25.1	D	24.1	C	-1.0	no
7. Willow Rd/Durham St <sup>1</sup>	signal	11.9	В	9.7	В	-2.2	no
8. Willow Rd/O'Keefe St <sup>2</sup>	1-way stop	77.7	F	59.0	D	-18.7	no
9. Willow Rd/Coleman Ave <sup>1</sup>	signal	15.8	В	15.9	В	0.1	no
10. Willow Rd/Gilbert Ave 1	signal	12.3	В	12.1	В	-0.2	no
11. Willow Rd/Middlefield Rd <sup>1</sup>	signal	66.4	E	52.1	C	-14.3	no
12. Menalto Ave/Durham-Donohoe St <sup>2</sup>	2-way stop	10.9	В	10.6	В	-0.3	no
13. Menalto Ave/O'Keefe St <sup>2</sup>	all-way stop	8.9	A	8.8	A	-0.1	no
14. Menalto Ave/Walnut-O'Connor St <sup>2</sup>	all-way stop	12.2	В	12.1	В	-0.1	no
15. Menalto Ave/Elm St <sup>2</sup>	all-way stop	7.9	A	8.1	A	0.2	no
16. Menalto Ave/Oak Ct <sup>2</sup>	1-way stop	10.4	В	10.4	A	0.0	no
17. Menalto Ave/Gilbert Ave <sup>2</sup>	all-way stop	8.5	A	8.6	A	0.1	no
18. Menalto Ave/Woodland Ave <sup>2</sup>	all-way stop	8.8	A	8.9	A	0.1	no
19. Woodland Ave/Middlefield Rd <sup>2</sup>	1-way stop	24.5	C	23.1	C	-1.4	no
20. Elliott Dr/O'Connor St <sup>2</sup>	1-way stop	17.0	C	13.5	В	-3.5	no
21. Byers Dr/O'Connor St <sup>2</sup>	1-way stop	11.2	В	9.3	A	-1.9	no
22. Woodland Ave/Oak Ct <sup>2</sup>	1-way stop	10.7	В	9.7	A	-1.0	no
23. University Ave/Woodland Ave <sup>2</sup>	signal	50.9	D	43.2	D	-7.7	no

Notes: Delay show in "seconds per vehicle" per the *Highway Capacity Manual* (HCM) Operations method.

**BOLD** values indicate unsatisfactory LOS D, E, or F conditions.

<sup>&</sup>lt;sup>1</sup> Existing traffic counts provided by City of Menlo Park. Counts collected in mid-May 2012.

<sup>&</sup>lt;sup>2</sup> Existing traffic counts collected in early-November 2013.

Based on the table, the following intersections are forecast to continue to operate with unsatisfactory LOS (LOS D, E, or F) with implementation of the proposed project:

- 1. Ravenswood Avenue/Middlefield Road (was LOS E with 76.2 seconds of delay; improves to LOS D with 70.0 seconds of delay).
- 8. Willow Road/O'Keefe Street (was LOS F at 77.7 seconds of delay; improves to LOS D with 59.0 seconds of delay).
- 23. University Avenue/Woodland Avenue (was LOS D at 50.9 seconds of delay; improves to LOS D with 43.2 seconds of delay).

Although these intersections would continue to operate with unsatisfactory LOS, implementation of the proposed project would improve, or lessen, delays at those intersections. With implementation of the proposed project, the following intersections would improve to satisfactory conditions (LOS A, B, or C).

- 2. Ringwood Avenue/Bay Road (was LOS D with 28.6 seconds of delay; improves to LOS C with 23.1 seconds of delay).
- 6. Willow Road/Chester Street (was LOS D with 25.1 seconds of delay; improves to LOS C with 24.1 seconds of delay.
- 11. Willow Road/Middlefield Road (was LOS E at 66.4 seconds of delay; improves to LOS C with 52.1 seconds of delay).

# b) Conflict with applicable congestion management program service standards and travel demand Measures, or other standards established by county congestion management agency for roads and highways?

Less Than Significant Impact. Per the City/County Association of Governments of San Mateo County (C/CAG), which administers the County's Congestion Management Program (CMP), the nearest CMP facilities to the project site are El Camino Real (SR 84) and the intersection of Willow Avenue/El Camino Real. The proposed project would convert an existing private K-8 school to a public 3-5 school. Based on the traffic analysis above, with the proposed project, regional trips (some from El Camino Real) would be diminished with implementation of the proposed project since it would serve students from the adjacent residential areas that are currently attending school at Enciral and Laurel schools. Therefore, since the proposed project would reduce trips on regional roadways, it would not conflict with the C/CAG CMP.

# c) Result in a change to air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

*No Impact*. The proposed project is the development of an existing school site that would not change existing air traffic patterns. There are no airports within close proximity to the project site.

# d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. As discussed below, the proposed project would not substantially increase hazards due to a design feature. The project site is currently a K-8 private school, so the conversion to a public school would not be an incompatible use.

#### Project Access, On-Site Circulation, and Queuing

Primary vehicle access would continue to be provided from the existing driveway at the eastern terminus of Elliott Drive; and, a new gated school bus and emergency only access on Oak Court. All passenger-car traffic would continue to use the driveway off Elliott Drive which would connect to an internal drive aisle that would circulate in a counter-clockwise direction to allow students to be dropped-off/picked-up along the curb-lane of the proposed loading zone. In addition, the drive aisle would provide access to the 53 space (including four disabled spaces) parking lot, of which 17 visitor spaces (including two disabled spaces) would have direct access back to Elliott Drive (i.e., vehicles do not need to circulate through the loading zone), while the remaining 36 faculty/staff spaces (including two disabled spaces) would be located in the southern portion of the lot. The drive aisle would be a single lane drive aisle until it reaches the loading zone where it would become two lanes (one way), where one lane would be the drop-off/pick-up lane and the other lane would be the bypass lane. The two-lane segment of the loading zone would be able to accommodate a queue of 31 vehicles. The new gated access driveway on Oak Court would only be allowed to be used for inbound school bus access (two bus trips per school day, not including occasional buses for field trips), and inbound emergency vehicle access. All authorized vehicles entering from this gate would be required to exit the campus from Elliott Drive. The driveways and drive aisle would be constructed to meet the City's standards, and for adequate emergency vehicle access. In addition, the proposed project would generate less trips than the existing private school because most of its students would be from the surrounding neighborhoods. Therefore, it is anticipated that school-related traffic would be less than the existing traffic generated by the private school.

#### e) Result in inadequate emergency access?

Less Than Significant Impact. Primary vehicle access would continue to be provided from the existing driveway at the eastern terminus of Elliott Drive; and, a new gated school bus and emergency only access on Oak Court. The drive aisle would be a single lane drive aisle until it reaches the loading zone where it would become two lanes (one way), where one lane would be the drop-off/pick-up lane and the other lane would be the bypass lane. The new gated access driveway on Oak Court would only be allowed to be used for inbound school bus access (two bus trips per school day, not including occasional buses for field trips), and inbound emergency vehicle access. All authorized vehicles entering from this gate would be required to exit the campus from Elliott Drive. The driveways and drive aisle would be constructed to meet the City's standards, and for adequate emergency vehicle access.

# f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. There are existing pedestrian facilities (i.e., sidewalks) along both sides of Elliott Drive. The District will install a crosswalk across Elliott Drive before the school entrance to facilitate students needing to cross from the south side of Elliott Drive. In addition to pedestrian and bicycle access to the campus from Elliott Drive, other existing points of access occur from Oak Court on the southern end of the campus, and Falk Court on the eastern end of the campus. Oak Court is a limited access street with no sidewalks, but with shoulders on both sides of the street for pedestrian access. Oak Court has very low traffic as it only provides access to its adjoining residents. Falk Court intersects with Byers Drive and both streets contain existing sidewalks on both sides of the street. O'Connor Street currently has a mix of sidewalks and wide shoulders for pedestrian/bicycle access in the project vicinity.

An existing crosswalk exists at the intersection of Elliott Drive/O'Connor Street. The City has agreed to work with the District in providing continuous pedestrian/bicycle access along O'Connor Street to enhance the existing pedestrian facilities. Menalto Avenue contains existing sidewalks on both sides of the street and has all-way stop-controlled intersections with Gilbert Avenue, Elm Street, and O'Connor Street. In addition, a crosswalk exists at the intersection of Menalto Avenue/Oak Court. The proposed project has adequate pedestrian and bicycle facilities and access on-campus to serve its students. The surrounding streets and intersections also provide adequate pedestrian and bicycle facilities for the proposed project. The City has agreed to work with the District in providing continuous pedestrian/bicycle access along O'Connor Street to enhance the existing pedestrian facilities. Also, in the future, the City will be preparing a "Safe Routes to School" for the proposed 3-5 school. Therefore, the proposed project would not significantly impact policies, plans, and programs regarding public transit, bicycle, and pedestrian facilities.

#### XVII. UTILITIES AND SERVICE SYSTEMS

#### Significance Criteria

*Would the project:* 

- 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?
- c) require or result in the construction of new stormwater 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) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. Wastewater from the City is collected by the West Bay Sanitary District for conveyance to the Menlo Park Pump Station and force main to treatment facilities located within the eastern portion of Redwood Peninsula in Redwood City and operated by Silicon Valley Clean Water. The amount of wastewater would not significantly increase from the school site with implementation of the proposed new school facilities. The project is intended to accommodate already projected growth within the area. Furthermore, the character of the wastewater would continue to be domestic and would not substantially change treatment requirements. Plans and projects to improve and expand the capacity of the wastewater facilities for another 20 years beyond 2010 were carried out as part of Capital Improvement Projects. With completion of the improvements and wastewater capacity, no significant impact to wastewater facilities would result from the proposed school project.

# b) Require or result in construction or expansion of water or wastewater treatment facilities that could cause significant environmental impacts?

Less Than Significant Impact. Please see the response to item XVI.a, above, about the wastewater treatment facilities. Potable water service for the new school would be provided by American Water Services, Inc. from an existing line from O'Conner Street/Euclid Avenue that serves the current site (Gopi Nathan, Superintendent, American Water Services Inc., personal contact, May 2014). Water for irrigation at the school would continue to be furnished by the O'Connor Tract Water District, a small rural system that uses wells originally developed when the area was used for agriculture.

The implementation of the proposed project is not expected to have a significant impact upon the quantity of water required for the operation of the new school nor would it require or result in the construction or expansion of water facilities that could cause significant environmental impacts. A relatively small amount of water would be required during construction. With the opening of the reconstructed school, there would be a maximum enrollment of 45 students, along with 35 to 40 staff, compared to the current 315 students and 60 staff of the GAIS. In addition, the new facilities would be designed to minimize water use. Appurtenances would be installed to conserve water and lower flows. Landscape irrigation and watering would use automatic timers and native plantings would be selected, as feasible, to lessen the need for water.

### c) Require or result in the construction or expansion of stormwater drainage facilities that could cause significant environmental impacts?

No Impact. Please see the response to items VIII.a, b, c and e under Hydrology about drainage facilities.

#### d) Sufficient water available or are new or expanded entitlements needed?

Less Than Significant Impact. The amount of water required by the operation of the proposed new school would not significantly differ from the existing demand from the GAIS facilities. See the response to item XVI.b, above. During construction, minor amounts of water would be required for control of dust.

#### e) Adequate wastewater treatment capacity to serve project and existing commitments?

Less Than Significant Impact. The proposed project would result in a less than significant impact upon wastewater treatment capacity. Please see the response to items XVI. a and b, above.

#### f) Served by landfill with sufficient permitted capacity to accommodate project?

Less Than Significant Impact. Recology of San Mateo is the contractor for recyclables and waste within Menlo Park and other communities within the southeastern part of the county. The materials are taken to a transfer station at the Shoreline Environmental Center in San Carlos, owned and operated by the South Bayside Waste Management Authority (SBWMA), where recyclables (including much construction and demolition materials) are separated from other wastes. Under an agreement between SBWMA and the landfill, residual wastes are taken to a disposal site at the Ox Mountain Landfill, north of State Route 92 and Skyline Boulevard and east of the City of Half Moon Bay. Liquid wastes are collected by the West Bay Sanitary District and Fair Oaks Sanitary District and transmitted to facilities operated by Silicon

Valley Clean Water in Redwood Shores for disposal. As part of the requirements of the California Integrated Waste Management Board, adequate landfill capacity has been planned and provided to accommodate solid waste within the SBWMA service area that includes many cities within the southeast part of San Mateo County along with the West Bay Sanitary District.

The existing facilities would have sufficient capacity to handle the relatively small amount of solid waste generated from construction of the new school facilities. The District would continue its present program of minimizing solid wastes. The school would be designed to accommodate waste recycling areas and containers. With implementation of these measures, the project would have a less than significant impact on landfill capacity.

#### g) Complies with federal, state, and local statutes relevant to solid waste?

*No Impact.* Similar to other schools in the District, the proposed school would operate in compliance with regulations that are relevant to solid waste, including recycling. Please see the response to item XVI.f, above.

#### XVIII. MANDATORY FINDINGS OF SIGNIFICANCE

- 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 animal community, reduce the number or restrict the range of a rare or endangered plant or animal 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?
- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

### a) Substantially degrade environmental quality, biological resources, or examples of California history or prehistory?

Less Than Significant Impact. Based upon the evaluation in this Initial Study, the proposed project would not have the potential to significantly 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 animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

The proposed new school facilities would be implemented within an existing school site that does not include significant habitat or other biological resources. Potential presence of cultural resources would be addressed by measures incorporated into the project consistent with regulatory requirements and established protocols. The project would result in potentially minor short-term effects from construction activities such as particulate emissions and noise during construction. However, these possible impacts are considered less than significant, an expected part of construction and would be addressed by measures to lessen the effects to the extent practicable. There would be no significant environmental impacts from the operation of the new school facilities.

#### b) Impacts that are individually limited, but cumulatively considerable?

Less Than Significant Impact. Development of the proposed school facilities would not have the potential to achieve short-term environmental goals to the disadvantage of long-term ones (a short-term impact on the environment is one that occurs in a relatively brief, definitive period of time while long-term impacts would endure well into the future). The project would be implemented within an existing school site that has been highly disturbed and surrounded by existing residential uses. The proposed project would provide educational facilities to accommodate projected enrollment increases within the District. Relatively minor impacts may occur from construction activities, but these effects would be of relatively short duration, mitigated to the extent practicable, and not cumulatively considerable.

#### c) Environmental effects that will cause direct or indirect impacts on humans?

Less Than Significant Impact. The development of the proposed project would not have environmental effects that would cause substantial adverse effects upon human beings, either directly or indirectly. Potential environmental impacts have already been discussed as part of the evaluation. Less than significant impacts would be primarily limited to short-term construction-related impacts.

### V. PREPARERS OF THE INITIAL STUDY

### BENSON LEE, CONSULTING

Benson Lee, Project Manager/Principal

### **DKS ASSOCIATES**

Dennis Pascua, Project Manager

### VI. PERSONS AND AGENCIES CONTACTED

Ahmad Sheikholeslami, Facilities Planner/Program Manager, Menlo Park City Schools District

Ralph Caputo, Principal, RGM & Associates

Erwin Lee, Principal, Deems Lewis McKinley, Architects

Alan Gibbs, Principal, Terraphase Engineering, Inc.

Gopi Nathan, Superintendent, American Water Services Inc.

Charles Taylor, City Engineer, City of Menlo Park

#### VII. REFERENCES

- BAGG Engineers, Geotechnical Engineering Investigation and Geologic Hazard Evaluation- Proposed O'Connor Elementary School 275 Elliot Drive Menlo Park, San Mateo County, California, February 2014.
- California Department of Education, *Aeronautics Review for Proposed School Site at 275 Elliot Drive*, letter to Ahmad Sheikholeslami, Facilities Director, Menlo Park City School District, April 11, 2014.
- Gibbs, Principal Geologist, Terraphase Engineering, Inc. to Ahmad Sheikholeslami, Director of Facilities and Operations, Menlo Park City School District, *Stage II Pipeline Risk Assessment Report, Menlo Park City School District 275 Elliott Drive, Menlo Park, California*, June 12, 2014.
- Menlo Park, City of, adopted November 30 and December 1, 1994. City of Menlo Park General Plan (Policy Document and Background Document).
- Menlo Park, City of, August 2006, City of Menlo Park Zoning Ordinance.
- Terraphase Engineering, Inc., *Draft Phase I Environmental Site Assessment 275 Elliott Drive Menlo Park, California, 94025*, February 7, 2014.
- Terraphase Engineering Inc., Draft Preliminary Endangerment Assessment Work Plan 275 Elliott Drive Menlo Park, California 94025, March 24, 2014
- Weatherill, Robert, Advanced Tree Care., Arborist Tree Assessment Report American German International School Menlo Park, California, November 25, 2013
- U.S. Census Bureau; www.census.gov/qfd/states/06/06466870.html

### APPENDIX A. TRAFFIC DATA