

FINAL ENVIRONMENTAL IMPACT REPORT
DECIMA ALLEN ELEMENTARY SCHOOL REPLACEMENT
PROJECT
SCH#: 2020039043



Prepared for:

San Bruno Park School District
500 Acacia Ave
San Bruno, CA
94066

Prepared by:

Grassetti Environmental
Consulting
7008 Bristol Drive
Berkeley, CA 94705

December 2020

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Ph: (650) 624-3101**

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**Grassetti Environmental Consulting
7008 Bristol Drive
Berkeley, CA 94705**

in association with:

William Kostura, Architectural Historian

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SUMMARY

A. BACKGROUND AND FOCUS OF EIR

The San Bruno Park School District (SBPSD or “District”) is proposing to demolish the existing Decima Allen Elementary School (Allen School) and replace it with a new school on the existing school campus site.

Pursuant to California Environmental Quality Act (CEQA) Guidelines §15063(c) (3), the District has prepared an Initial Study to identify any potentially significant impacts of the Project. The Initial Study identified only historic resources as a potentially significant unavoidable impact; all other impacts were either less than significant or can clearly be mitigated to less-than-significant levels by implementation or mitigation measures identified in the Initial Study. Therefore, this Environmental Impact Report (EIR) is focused solely on Historic Resources. The Initial Study is attached as an appendix to this EIR.

B. PROJECT NEED AND OBJECTIVES

Existing school facilities include 14 standard classrooms, one special education classroom, a library, an administration building, and a multi-use room. The school campus also includes paved playfields and basketball courts, and a grass-turfed baseball field. The existing school has a capacity of about 400 students. Many of the existing school buildings are over 60 years old and need a full modernization. Additionally, the existing site topography would make it almost impossible to meet Americans with Disabilities Act (ADA) requirements. Given these combined deficiencies, the District is proposing to replace the existing buildings with new ones and recontour the site to allow ADA compliance.

C. PROJECT DESCRIPTION

The Project would replace the existing school with five new buildings on the eastern and southern parts of the site, where the existing playfields are located. The site would be benched with upper and lower benches. Landscaped areas include a new amphitheater, outdoor classroom area, lunch area with picnic tables, two new play areas, and a new play field. A new parking area with 33 spaces would be provided, to be accessed from Linden Avenue. Capacity of the new school would be increased from the current 400 students to about 500 students, including about 75 students to be relocated from the District’s Hesselgren preschool at 525 Elm Street. These changes are described in detail in Chapter 2, Project Description.

The SBPSD proposes to construct most of the replacement school buildings on the playfield areas of the existing school. Once those facilities are completed, students would move to the new school buildings and the existing buildings would be demolished and removed, and new play areas constructed. Phase 1, which includes grading of the existing playfield areas and construction of all of the new buildings

except the library, would occur from May 31, 2021 through July 29, 2022. Phase 2, which includes demolition and removal of the existing buildings, grading of the remaining site areas, and construction of the library and new play areas, is proposed for June 6, 2022 through December 30, 2022.

D. PURPOSE AND USE OF THIS EIR

The proposed Project would require approval by the District, as well as several other agency approvals. Therefore, the San Bruno Park School District is the CEQA Lead Agency for this project. This EIR will need to be certified by the District as complete and adequate prior to other agency approvals. This EIR may then be used by CEQA Responsible Agencies in their permit approval actions.

The project would require the following non-District agency approvals and authorizations:

- City of San Bruno Grading Permit;
- Regional Water Quality Control Board, San Francisco Bay Region, Construction Stormwater Pollution Prevention Plan and Permit;
- Bay Area Air Quality Management District, Approval Letter for asbestos demolition; and
- Division of the State Architect review of construction plans.

E. ENVIRONMENTAL IMPACTS

Table S-1, below, summarizes the environmental impacts of the proposed project.

Table S-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

ENVIRONMENTAL IMPACT	MITIGATION MEASURE	LEVEL OF SIGNIFICANCE AFTER MITIGATION
Aesthetics: Change in views from nearby residences due to loss of trees.	Mitigation Measure AES-1: A tree replacement plan shall be developed in consultation with the City's Arborist and implemented by the District. The proposed plan would include replacement of District-protected trees with large specimen trees. (24" or 36" box). A minimum 1 to 1 replacement shall occur, with 2 to 1 replacement if determined to be feasible by the Project landscape architect. To the extent feasible, mature native trees at the perimeter of the site (identified in the project's arborist report) shall be preserved.	Less than Significant
Air Quality: Impacts from construction-generated particulates	Mitigation Measure AQ-1. The Project construction contractor shall implement the following measures to further reduce construction-related diesel particulate exhaust emissions: <ul style="list-style-type: none"> • All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements: • All Project diesel-powered construction equipment shall have engines rated at least EPA Tier 3, with Tier 4 equipment substituted wherever possible to obtain the maximum possible DPM emissions reduction from Project equipment. 	Less than Significant

<p>Biological Resources: Potential impacts on special-status birds from tree removal</p>	<p><i>Mitigation Measure BIO-1:</i> Wherever possible, any tree removal should occur during the period of September 1 to January 31, which is outside of the nesting season. If construction activities and/or tree removal would commence anytime during the nesting/breeding season of native bird species potentially nesting near the site (typically February through August in the project region), a pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks of the commencement of construction activities. If construction during the nesting season ceases for more than 10 days or moves to a new locale on the site, nesting bird surveys shall be conducted prior to the restart of work.</p> <p>If active nests are found in areas that could be directly affected or are within 200 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance 50-foot buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged.</p>	<p>Less than Significant</p>
<p>Cultural Resources: Possible effects to unknown archaeological resources and prehistoric human remains.</p>	<p><i>Mitigation Measure CULT-1: Archaeological Deposits.</i> If an inadvertent discovery of cultural materials (e.g. unusual amounts of shell, animal bone, bottle glass, ceramics, structure/building remains, etc.) is made during project-related construction activities, ground disturbances in the area of the find shall be halted within a 50-foot radius of the discovery and a qualified archaeologist must be retained to document the discovery, and assess its significance. The archaeologist shall determine whether the resource is potentially significant as per the CRHR and recommend treatment. Any recommended treatment shall be implemented.</p> <p><i>Mitigation Measure CULT-2: Human Remains.</i> In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the San Mateo County Sheriff/Coroner and a qualified professional archaeologist. The Sheriff/Coroner is required to examine all</p>	<p>Less than Significant</p>

	<p>discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist shall consult with a Most Likely Descendent (MLD) determined by the NAHC regarding the removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity. Construction activities shall not resume until either the human remains are exhumed, or the remains are avoided via Project construction design change.</p>	
<p>Impacts of project's proposed removal of National Register of Historic Places - eligible existing school buildings</p>	<p>A. Prepare HABS-style report. This report need not be in an official HABS format, but should include all of the information required in a HABS report, including:</p> <ul style="list-style-type: none"> • Building name and location • Statement of Significance • Identify the author of the report; and identify the photographer, if different from the author • Statement explaining why this report has been produced • Dates of design and construction. Explain when the various buildings and covered walks were designed and built. Identify dates of major alterations. • Profiles of the architects, Masten & Hurd and James H. Mitchell. The existing historic evaluation contains most of this information, however additional illustrations of their works, especially from the late 1930s on, should be included. • Historical context: Schools in San Bruno. Photographs of the modern-era 	<p>Significant and Unavoidable</p>

	<p>schools should be added to the history provided in the current architectural evaluation.</p> <ul style="list-style-type: none">• Changes in school design, 1900s-1950s. To the history that I related in my evaluation, a larger, nationwide perspective should be added. This part of the report should be illustrated with photographs of Streamlined Moderne and early International style (1930s-1950s) California schools.• Additional historic information of Edgemont/Allen School, if such information is available at the school or at the school district's offices; this may include:<ul style="list-style-type: none">○ A list of all of the school principals back to 1910, and the years they served, would be desirable.○ If any teachers received awards, or were especially beloved by the students, stating that would be desirable as well.○ A biographical sketch of Decima M. Allen, and a photograph of her if one is available.• Physical description of the buildings and grounds, including some interior spaces. These would be described in more detail than what I wrote in my evaluation. Unit 1 would receive the most robust treatment. Units 2, 3, and 4 need not be described in as great detail, but differences between them and Unit 1 should be carefully described. The Administration Building, the Multipurpose Building, and the Kindergarten/Media Center should all be described in detail. The covered walks or breezeways, the front lawn, and the courtyards should be described sufficiently to indicate their general character.• Photographs and plans of Edgemont/Allen School. Depending on your budget, these could be HABS-level archival b&w photographs; or high-density color digital photos printed and also on CDs. If the former, a professional photographer experienced in archival photography should be hired. These photos should be of:<ul style="list-style-type: none">○ all four sides of Unit 1 and Unit 2	
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	<ul style="list-style-type: none">○ the south side of Unit 4○ deck shots of the covered walks alongside of units 2, 3, or 4○ ceiling detail of one of the above covered walks○ roofline detail○ window in Unit 1 showing altered sash○ window in Unit 2, 3, or 4 showing original wooden sash○ a typical steel door in units 1, 2, 3, or 4○ the hallway in Unit 1○ a typical classroom interior○ all three visible sides of the Administration Building○ original window in the north side of the Administration Building○ all four sides of the All-purpose Building and the Kindergarten/Media Center. These may be taken as perspective views, capturing two sides in one shot.○ interior of the All-purpose Building○ ceiling of the All-purpose Building○ the covered walk connecting the east sides of units 2, 3, and 4○ the covered walk along the west side, view looking east○ the covered walk along the west side, deck shot○ the lawn in front of Unit 1○ one or more of the courtyards between units 2, 3, and 4○ the paved playground● In addition to current photographs, the following illustrations should be used:<ul style="list-style-type: none">○ 1949 Sanborn map (in my historical evaluation)○ current plot plan (in my historical evaluation)○ photographs from original blueprints <p>This report should be placed in the following places:</p> <ul style="list-style-type: none">● San Bruno Public Library	
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	<ul style="list-style-type: none"> • San Mateo County Historical Archives, in the San Mateo County Museum • Environmental Design Library, Wurster Hall, University of California, Berkeley and/or • Documents Collection, College of Environmental Design, Wurster Hall, University of California, Berkeley <p>B. Additional Recommended Measures</p> <p><u>Preservation of Original plans</u></p> <p>The original blueprint drawings for the school survive. If the school district does not need them, selected sheets (elevations, plot plans, floor plans) could be offered to the Documents Collection, College of Environmental Design, Wurster Hall, University of California, Berkeley. Their preservation would be valuable because of the historical significance of this school's design.</p> <p><u>Preservation of a Fragment of the Original Building</u></p> <p>In front of the Administration Building there is a wall on which the name of the school is spelled in metal letters. Preservation of this wall could help to evoke the memory of this school if space is available on the grounds of the new building.</p>	
<p>Soils and Geology: Potential damage and hazards associated with seismic shaking and related ground failure</p>	<p><i>Mitigation Measure GEO-1.</i> The project structures and foundations shall be designed in accordance with the most recent version of the California Building Code. Recommended seismic coefficients provided in the Miller Pacific geotechnical report shall be included in the project design.</p> <p><i>Mitigation Measure GEO-2.</i> The project's site clearing, site preparation, subgrade preparation and stabilization, fill, drainage, and foundation systems shall be designed and constructed per the specifications set forth on the project geotechnical report (Miller Pacific 2019).</p>	Less than Significant

Potential erosion during construction.	Mitigation Measure GEO-3. The project shall include a site drainage system to collect surface water and discharging it into an established storm drainage system. The project Civil Engineer or Architect shall be responsible for designing the site drainage system and, an erosion control plan could be developed prior to construction per the current guidelines of the California Stormwater Quality Association's Best Management Practice Handbook.	Less than Significant
Hazards and Hazardous Materials: Potential risk of soil and water contamination during construction	Mitigation Measure HAZ-1. Prior to demolition of buildings on the project site, a full asbestos and lead based paint survey of the buildings shall be performed by qualified asbestos and lead-based paint inspectors/consultants. If containing materials or lead-based paints are identified at any of the site buildings proposed for renovation and or demolition, standard asbestos and lead-based paint abatement and dust control measures shall be implemented in compliance with OSHA and Cal/OSHA statutes. This work shall be performed at a minimum with the controls and work practices described in Title 8 CCR 1532.1, which describes work, practices and respiratory protection. At a minimum, prior to demolition, any ACM and/or LBP shall be stabilized, and demolition of building materials that have potential contaminants be placed in appropriate covered containers prior to off-site removal to reduce the potential for airborne emissions. Similarly, the existing buildings shall be surveyed for PCB-containing equipment, light ballasts, and light tubes, and any such equipment shall be removed and disposed of appropriately prior to building demolition. All removal of potentially contaminated materials shall be conducted only by qualified personnel with appropriate training and certifications.	Less than Significant
Hydrology and Water Quality: Potential construction-related stormwater contamination	Mitigation Measure HYD-1: Prior to the issuance of grading permits for the proposed Project, the Project engineers shall prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the Project site during construction.	Less than Significant

Potential long-term site-runoff contamination	<p>Mitigation Measure HYD-2: The District shall prepare a long-term Stormwater Control Plan for the project site. It shall maintain in perpetuity the post-construction BMPs listed in the Stormwater Control Plan. The District shall make changes or modifications to the BMPs to ensure peak performance. The District shall be responsible for costs incurred in operating, maintaining, repairing, and replacing the BMPs. The District shall conduct inspection and maintenance activities and complete annual reports.</p>	Less than Significant
Noise: Construction Noise Impacts	<p>Mitigation Measure NOI-1: The following noise-control Best Management Practices shall be incorporated into the construction documents to be implemented by the Project contractor:</p> <ul style="list-style-type: none"> ○ Provide enclosures and noise mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy activity areas on the site. ○ Use quietest type of construction equipment whenever possible, particularly air compressors. ○ Provide sound-control devices on equipment no less effective than those provided by the manufacturer. ○ Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors. ○ Prohibit unnecessary idling of internal combustion engines. ○ Designate a noise disturbance coordinator at the San Bruno Park School District who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site. Copies of the project purpose, description and construction schedule shall also be distributed to the 	Less than Significant

	<p>surrounding residences.</p> <p>Mitigation Measure NOI-2: Further restrictions shall be placed on hours of Project construction activity than those allowed under the Municipal Code. Thus, construction activity shall be limited to weekdays between 7 AM and 6 PM, and prohibited on weekends and all holidays observed in the City of San Bruno.</p> <p>Mitigation Measure NOI-3: If at any times when school is in session that construction equipment needs to operate near on-site noise-sensitive school receptors (i.e., classrooms, staff offices, the library), the Project contractor shall consult with the school principal/faculty/staff to arrange for a temporary relocation of the said receptors to minimize disruption to educational activities while the work is completed.</p> <p>Mitigation Measure NOI-4: All heavy trucks delivering building supplies or off-hauling excavated soil or demolition debris shall exit the site to Linden Avenue and proceed directly to El Camino Real and on to area freeways, thereby avoiding residential areas facing Elm Avenue, Angus Avenue and any other neighborhood local streets.</p> <p>Mitigation Measure NOI-5. To assure that average interior noise levels within the new school's class rooms and library achieve the WHO-recommended indoor noise exposure standard of 35 dBA Leq during its operating hours, the new Project structure shall have sound-rated walls, windows and exterior doors adequate to achieve WHO noise standards. This shall be verified by a Project building-specific acoustical analysis by its engineers/architects during the final Project design phase. The results of the analysis, including the description of the necessary noise control features to attain the standard, will be submitted to the City along with the final building plans and approved prior to issuance of a building permit.</p>	
Traffic: Increase in traffic generation and	The traffic analysis conducted for the project concluded that no significant traffic or traffic hazards would result from the project. No mitigation required.	Less than Significant

hazards.		
Cumulative Impacts: Impacts of project and other nearby proposed development	No potentially significant cumulative impacts were identified.	Less than Significant

D. ALTERNATIVES

Alternatives Evaluated in this EIR

The Proposed Project is described in Chapter II of this EIR and the impacts are evaluated in Chapter III. Two alternatives to the Proposed Project are evaluated in this chapter: the Historic Preservation alternative, and the CEQA-mandated No Project Alternative.

Alternative 1: Historic Preservation

Under this alternative, the significant unavoidable impact of the proposed project on historic resources to a less-than-significant level, as identified by the Architectural Historian

This alternative would entail preservation of the two wings facing and closest to Angus Avenue West would adequately convey the early International style of the complex, as designed by architects Masten and Hurd.

Under this alternative, new buildings would still be needed to replace the buildings to be removed. This alternative would not meet the project's goal of meeting ADA accessibility requirements, as the split-level contours of the school would be retained.

Alternative: No Project

Under this alternative, the replacement school would not be developed. All construction and operational impacts associated with the proposed project would be eliminated. No significant unavoidable impacts would occur. However, none of the project's objectives would be achieved.

Environmentally Superior Alternative

The No Project Alternative would have the fewest impacts, however CEQA requires that an alternative other than the No Project Alternative be considered the Environmentally Superior Alternative. Therefore, the Historic Preservation Alternative would be the environmentally superior alternative under CEQA, as it would reduce the project's significant unavoidable impacts to historic resources to a less-than-significant level. However, as detailed below, it would not meet the proposed project's goal of achieving ADA compliance at the school

I. INTRODUCTION

A. BACKGROUND

The San Bruno Park School District (SBPSD or “District”) is proposing to demolish the existing Decima Allen Elementary School (Allen School) and replace it with a new school on the existing school campus site. Pursuant to California Environmental Quality Act (CEQA) Guidelines §15063(c) (3), the District has prepared an Initial Study to identify any potentially significant impacts of the Project. The Initial Study identified only historic resources as a potentially significant unavoidable impact; all other impacts were either less than significant or can clearly be mitigated to less-than-significant levels by implementation or mitigation measures identified in the Initial Study. Therefore, this Environmental Impact Report (EIR) is focused solely on Historic Resources. The Initial Study is attached as an appendix to this EIR.

Existing school facilities include 14 standard classrooms, one special education classroom, a library, an administration building, and a multi-use room. The school campus also includes paved playfields and basketball courts, and a grass-turfed baseball field. The existing school has a capacity of about 400 students. Many of the existing school buildings are over 60 years old and need a full modernization. Additionally, the existing site topography would make it almost impossible to meet Americans with Disabilities Act (ADA) requirements. Given these combined deficiencies, the District is proposing to replace the existing buildings with new ones and recontour the site to allow ADA compliance.

The Project would replace the existing school with five new buildings on the eastern and southern parts of the site, where the existing playfields are located. The site would be benched with upper and lower benches. Landscaped areas include a new amphitheater, outdoor classroom area, lunch area with picnic tables, two new play areas, and a new play field. A new parking area with 33 spaces would be provided, to be accessed from Linden Avenue. Capacity of the new school would be about 500 students, including about 75 students to be relocated from the District’s Hesselgren preschool at 525 Elm Street. These changes are described in detail in Chapter 2, Project Description.

B. PURPOSE AND USE OF THIS EIR

The proposed Project would require approval by the District, as well as several other agency approvals. Therefore, the San Bruno Park School District is the CEQA Lead Agency for this project. This EIR will need to be certified by the District as complete and adequate prior to other agency approvals

In addition, the project would require the following agency approvals and authorizations:

- City of San Bruno: Grading Permit, Public Right-of-Way and parking restriction approvals, and Encroachment Permits;
- Regional Water Quality Control Board, San Francisco Bay Region: Construction Stormwater Pollution Prevention Plan and Permit;
- Bay Area Air Quality Management District, Approval Letter for asbestos demolition; and
- Division of the State Architect review of construction plans.

This EIR may be used by those CEQA Responsible Agencies in their permit approval actions.

C. FOCUSED EIR APPROACH

As discussed above, pursuant to CEQA Guidelines §15063(c) (3), the District prepared an Initial Study to identify any potentially significant impacts of the Project. The Initial Study identified only historic resources as a potentially significant unavoidable impact; all other impacts were either less than significant or can clearly be mitigated to less-than-significant levels by implementation or mitigation measures identified in the Initial Study. Therefore, the EIR will be focused solely on Historic Resources. The Initial Study is being circulated for public review as an appendix to this Focused EIR. All mitigation measures identified in the Initial Study will be incorporated into the Project Mitigation Monitoring and Reporting Program (MMRP).

This EIR also includes alternatives and mitigation measures to reduce or eliminate the Project's potential significant impacts to historic resources.

D. PUBLIC REVIEW PROCESS

The San Bruno Park School District issued the Notice of Preparation for this EIR on March 13, 2020. The NOP is included as Appendix A to this EIR. The NOP was circulated to applicable local and state agencies, and interested parties for a 30-day period ending on April 14, 2020. Response letters also are included in Appendix A.

This Draft Focused EIR was circulated for a 45-day public review and comment period ending on September 22, 2020. All relevant comments on environmental issues received during the public review period have been responded to in this Final EIR (FEIR), appendix F. That FEIR will need to be certified by the District as complete and adequate prior to the District's approval of the Project. In order to approve the project, the District also is required to make necessary findings under CEQA section 15091, and adopt a Mitigation Monitoring and Reporting Program (MMRP). The MMRP will incorporate all mitigation measures ultimately required by the District.

E. ORGANIZATION OF THIS DOCUMENT

This Focused EIR is organized in the following manner:

Chapter I – Introduction. This chapter describes the background, review process, and organization of this document.

Chapter II – Summary. This chapter summarizes the project description, environmental impacts and mitigation measures, and alternatives.

Chapter III – Project Description. This chapter provides a description of the proposed project, project site location and general existing conditions. It also describes project objectives, the use of this document and future approvals required for the Project.

Chapter IV – Environmental Setting, Impacts and Mitigation Measures. This chapter describes, for each environmental topic: existing conditions (setting); potential environmental impacts and their level of significance; and mitigation measures recommended to mitigate identified impacts.

Chapter V – Alternatives. This chapter provides an evaluation of a Historic Preservation Alternative and a No Project Alternative. Alternatives considered but rejected and the environmentally superior alternative also are discussed in this chapter.

Chapter VI – Other CEQA Topics and Impact Overview. This section addresses CEQA-mandated topics of growth-inducing impacts, cumulative impacts, significant unavoidable adverse impacts, and significant irreversible environmental changes.

Chapter VII – Report Preparers. This chapter provides a list of persons who authored this document and organizations and persons consulted in the process of CEQA analysis.

Chapter VIII – References and Persons Contacted. This chapter provides full references for all documents used in this CEQA analysis.

Appendices – The appendices contain the Notice of Preparation and responses, Initial Study, background technical reports, Mitigation Monitoring and Reporting Program, and Comments and Responses on the DEIR.

II. PROJECT DESCRIPTION

This chapter identifies the existing conditions at the site, discussed the purpose and need for the Project, and describes the Project, including construction and operational characteristics.

A. PROJECT OBJECTIVES

Many of the existing school buildings are over 70 years old and need a full modernization. Additionally, the existing site topography would make it almost impossible to meet Americans with Disabilities Act (ADA) requirements. Given these combined deficiencies, the District is proposing to replace the existing buildings with new ones and recontour the site to allow construction of a school campus where all buildings are in ADA compliance. The ADA compliance issue is discussed further in Chapter V, Alternatives.

C. SITE DESCRIPTION

Project Location and Surrounding Land Uses

Decima Allen Elementary School is located at 875 Angus Avenue West in the central area of the City of San Bruno, in San Mateo County (See Figure 1). Regionally, the campus is accessed via from US Highway 101, via San Bruno Avenue, and US Highway 380, via El Camino Real. The Millbrae BART Station is located approximately 2.5 miles south of the school.

As shown on Figure 2, the Allen School campus is surrounded by Angus Avenue West on the north, Elm Avenue on the west, Linden Avenue on the east, and single-family residences to the south. The City of San Bruno library, City Hall, and a fire station are directly across Linden Avenue from the school. Single family residences are across the street from the school to the west and north. The El Camino Real commercial strip is one block west of the school.

The Allen School occupies about 5.3 acres. The history of Allen School can be traced back to 1910 with the foundation of Edgemont School. Old Edgemont School opened in 1910 on the site of the current district offices. New Edgemont School (now the main campus) at Angus and Elm Avenues opened in 1941 with nine classrooms. Six more classrooms were added in 1946. The offices, cafeteria and kindergarten (now the Media Center) were added in 1956 when the school was renamed in honor of Decima M. Allen, San Bruno's librarian from 1937 to 1955 as well as a 25-year member of the school board and president of the Edgemont PTA.

Existing School Facilities

The existing Decima Allen Elementary School facilities include 14 standard classrooms, one special education classroom, a library, an administration building, and a multi-use room. The school campus also includes paved playfields and basketball courts, and a grass-turfed baseball field. The existing school has a capacity of about 400 students. Existing and proposed school facilities are summarized on Table 1.

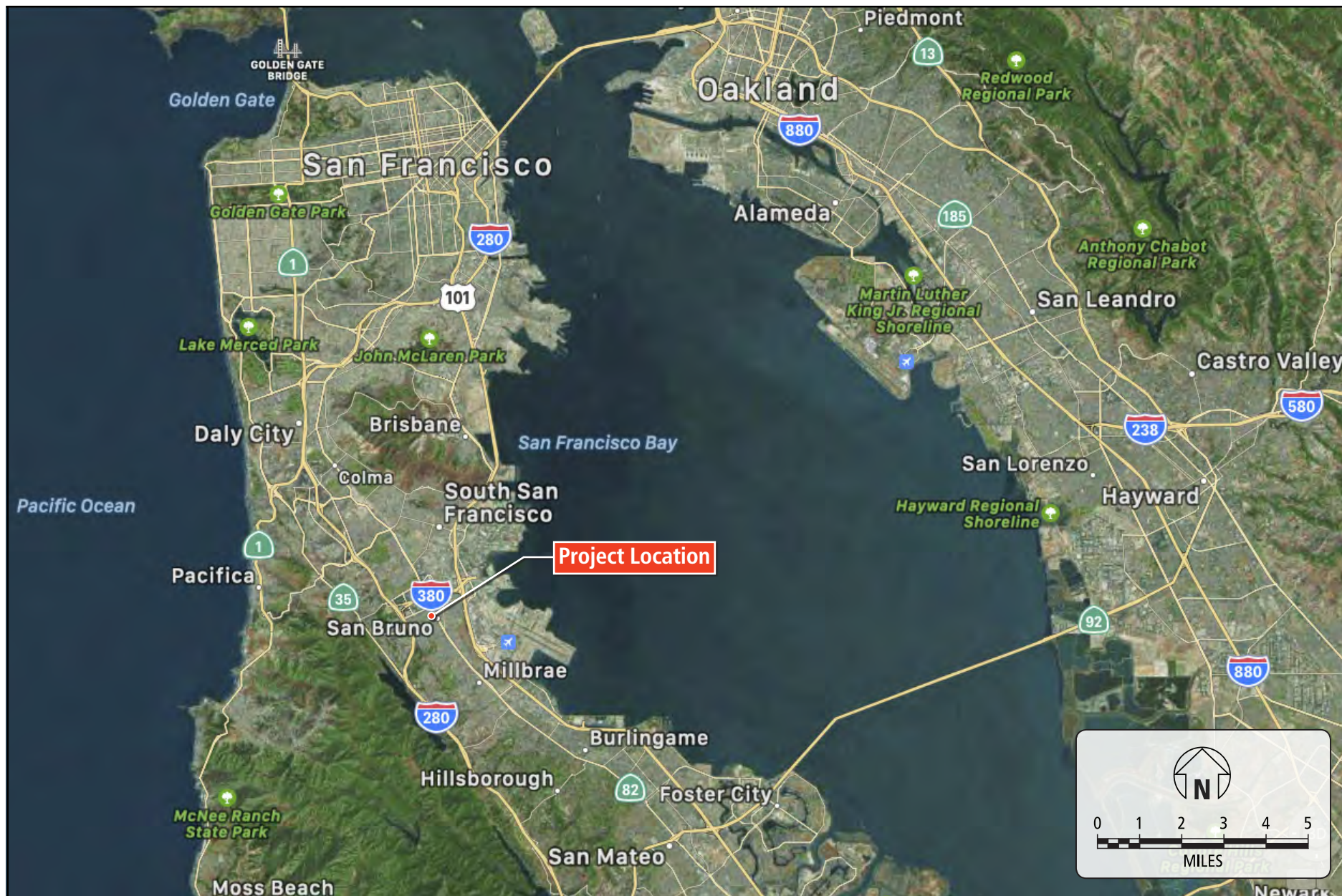


Figure 1
Project Location

Source: TomTom Maps



Figure 2
Aerial Photograph of Existing Campus and Project Site

Source: TomTom Maps

Table 1: Existing and Proposed School Facilities

Building	Current	SF	Proposed	SF
Standard Classrooms	14	12,389	15	13,729
Specialty Classrooms	0	0	2	2,367
Special Education Classrooms	1	930	1	983
Library	1	2204	1	2716
Administration	1	1385	1	3196
Multi-Use Room / Food Service	1	4490	1	8435
Operational Support	LS	4498	LS	10,668
Circulation	LS	2776	LS	10,770
		28,672		52,864

Proposed Replacement School

Overview

The SBPSD proposes to construct most of the replacement school buildings on the playfield areas of the existing school. Once those facilities are completed, students would move to the new school buildings and the existing buildings would be demolished and removed, and new play areas constructed. Phase 1, which includes grading of the existing playfield areas and construction of all of the new buildings except the library and kindergarten, would occur from May 31, 2021 through July 29, 2022. Phase 2, which includes demolition and removal of the existing buildings, grading of the remaining site areas, and construction of the library, kindergarten building, and new play areas, is proposed for June 6, 2022 through December 30, 2022.

Proposed Facilities and Operations

The proposed project includes construction of five new buildings on the eastern and southern parts of the site, where the existing playfields are located. The site would be benched with upper and lower benches. Landscaped areas include a new amphitheater, outdoor classroom area, lunch area with picnic tables, two new play areas, and a new play field. A new parking area with 33 spaces would be provided, to be accessed from Linden Avenue. The proposed project is summarized in Table 1, above, and shown on the site plan in Figure 3, below.

The new school buildings would be one- and two-stories and of modern design. The maximum building heights would be approximately 31 feet above grade. Buildings would be constructed on the site, with staging occurring within the construction site.

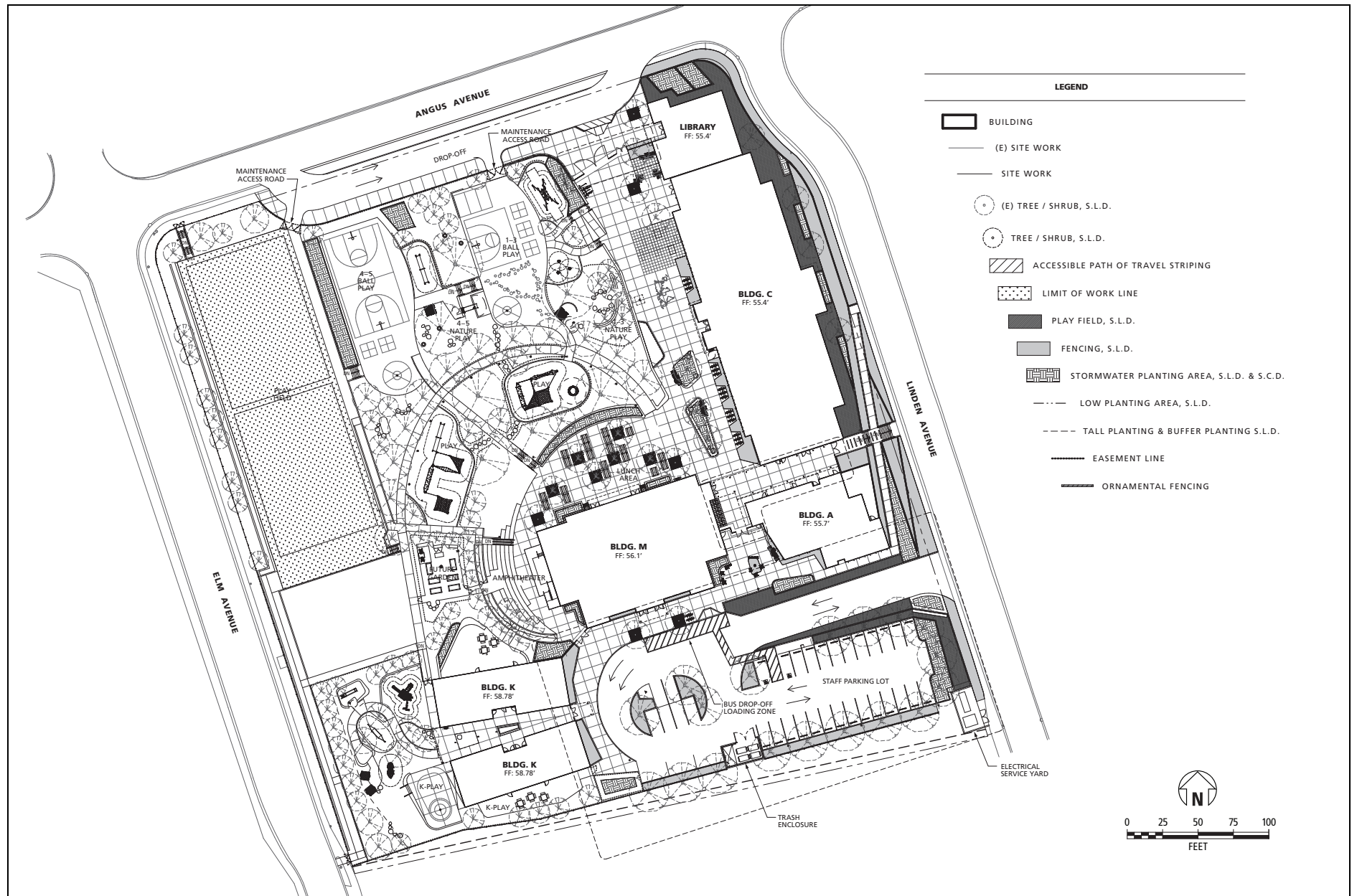


Figure 3
Proposed Site Plan

Source: Hibser Yamauchi Architects, Inc.

Grading and foundation work would occur during the summer, with construction of the buildings continuing for about a year. The construction site would be securely fenced so that access by children at the school would not be prohibited. A portion of the existing blacktop available as well as the courtyard spaces between wings will be available for children play areas in the interim period.

The child drop-off area would remain on Angus Street; an internal drop off driveway would be provided, eliminating the need for on-street drop offs. The number of parking spaces to be provided would be slightly greater than existing (33 spaces compared to the existing 30 spaces).

Capacity would be increased from about 400 students to about 500 students. The current enrollment is 337 elementary school students at the Allen School campus and 72 kindergarten students at the Hesselgren Primary School at 525 Elm Street. No increase in elementary school enrollment is anticipated, however the Hesselgren students would be relocated to the new Allen school, and a pre-school with approximately 15 students per period (morning and afternoon periods) is proposed for the site. School hours would remain at 8:25 – 2:45 for the elementary school students and would be 8:20-12:30 for the preschool.

Lighting. Perimeter lighting and lighting outside of the new school buildings would be provided, in addition to parking lot lighting. No play field lighting is proposed.

Grading. Approximately 30,000 cubic yards of material would be graded on the site to provide level areas for the new buildings and play areas. Approximately 21,300 cu. yds. would be cut and about 9200 cu. yds. will be fill. Approximately 12,000 cubic yards of material would be hauled off of the site, and the remainder would be balanced on the site. Substantial topographic changes would occur on the site- it would be benched into upper playfield areas and lower school building areas, with ramps connecting the two levels. In total, four benches would be created, with about five feet of elevation difference between each bench.

Tree Planting and Removal. There are 57 trees on the project site and two groves of trees overhand the property from adjacent properties. At least thirty-three trees would be removed as a result of the project, most of which are on the west, south and east perimeters of the site. It is possible that nearly all of the site's trees may be removed, depending on the final grading plan. Removed trees would be replaced at least a 1:1 ratio, with the goal of a 2:1 replacement ratio. A tree removal and replacement plan would be prepared as part of final project design. Trees are discussed in detail in the Aesthetics section of the IS, which is included as Appendix 2 to this EIR.

Landscape and Hardscape. The project would, when completed, increase landscaped areas on the campus compared to existing conditions. It would therefore reduce impervious surface area on the site from about 48,780 sq. ft. to about 44,192 sq. ft.

Drainage and Water Quality. The site would continue to drain into the City's existing storm drain system on Linden Avenue. A construction stormwater program would be implemented

during demolition and construction activities to assure that demolition materials and site soils do not enter the City's stormwater system. That stormwater drainage program would be reviewed by the City Public Works Department prior to implementation; the Construction Stormwater Pollution Prevention Plan would be reviewed by the Regional Water Quality Control Board.

Construction Equipment, Workers, and Hours

Construction. Construction activities would include grading, then construction of foundations, infrastructure, buildings, and landscaping. Construction would on M-F 7:00-4:30 with some Saturdays 9:00-4:30 possible. The future parking lot would be used as the construction laydown area. Construction would occur in the following phases:

- 1) Grading/Site Prep (5/31/21- 8/27/21)
- 2) Construction of New School except library (6/28/21-7/15/22)
- 3) Demolition of Old School (6/6/22- 7/29/22)
- 4) Construction of new library/fields/play areas (6/27/22-12/16/22)

Demolition. As summarized above, demolition would occur over a 2-month period in the summer of 2022. The first phase would be abatement: all lead-based paints, asbestos-containing materials, PCB-containing equipment, and any other potentially hazardous materials would be removed by specialized workers certified for such removal. Removed materials would be placed into covered dumpsters for removal to appropriate disposal facilities. After abatement is complete, the buildings would be demolished and the debris hauled off for recycling or landfilling. Approximately 125 truckloads of material (about 25,000 cubic yards) are expected to be removed, with 3 to 4 high-sided trucks cycling through the site, with loading occurring via a front-loader. Demolition activities typically would occur between 7 am and 3:30 pm, during the summer break.

Equipment Use. Equipment used during demolition and construction would vary by phase, but would include excavators, bulldozers, backhoes, dump trucks, haul trucks, graders, compactors, water trucks, and similar equipment.

Construction Workers. There would be up to 24 construction workers onsite on an average day.

Land Use Entitlements and Other Agency Approvals

SBPSD Approvals. The School District is a local agency with independent discretionary authority over site improvements. The District would take approval actions for the Project at a noticed SBPSD Board of Trustees Meeting.

Other Agency Approvals. The Project would require the following approvals from other agencies:

- City of San Bruno Grading Permit

- Regional Water Quality Control Board, San Francisco Bay Region, Construction Stormwater Pollution Prevention Plan and Permit;
- Bay Area Air Quality Management District, Approval Letter for asbestos demolition
- Division of the State Architect review of construction plans.

II. ENVIRONMENTAL SETTING, IMPACTS, AND MITIGATION MEASURES

A. BACKGROUND AND APPROACH

In accordance with the State CEQA Guidelines (CCR Section 15126.2), this Focused Draft Environmental Impact Report identifies and focuses on the significant direct and indirect environmental effects of the Project. Both short-term and long-term effects are discussed. Short-term effects are generally those associated with the construction of the Project and long-term effects are generally those associated with operation of the Project.

As described in Chapter 1, Introduction, this analysis focuses on a single environmental resource topic, historic resources, because all other topics were addressed in the Initial Study (Appendix B) and deemed to have no impact, less than significant impact, or less than significant impact with mitigation incorporated. The other environmental topics are also summarized in Chapter IV.A, Effects Found Not to be Significant.

This chapter follows the general format described below:

Environmental Setting. This section presents the existing environmental conditions on the Project sites and surrounding area as appropriate in accordance with the State CEQA Guidelines (CCR Section 15126). This section generally serves as the baseline against which environmental impacts are evaluated. It includes discussions on definitions related to the specific environmental resource, regional setting of the Project, and Project area setting.

Regulatory Setting. This section presents the laws, regulations, plans and policies that are relevant to each issue area. Regulations originating from the federal, State, and local levels are each discussed as appropriate. Government Code Sections 53091(e) and (f) state that County and City Building and Zoning Ordinances do not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water, wastewater or electrical energy by a local agency such as EMWD. Therefore, these issues will not be addressed in this section.

Environmental Impacts and Mitigation Measures. This section presents the thresholds of significance used to determine the level of significance of the environmental impacts for each resource topic in accordance with the State CEQA Guidelines (CCR Sections 15126, 15126.2 and 15143). The thresholds of significance used in this FDEIR are based on the checklist presented in Appendix G of the State CEQA Guidelines, best available data, and regulatory standards of federal, State and local agencies. The level of each impact is determined by comparing the effects of the Project to the environmental setting. Feasible mitigation measures that could avoid, minimize, rectify, reduce, or compensate for significant adverse effects are also presented. Recommended mitigation measures that are fully enforceable through incorporation into the Project [PRC Section 21081.6(b)] are also included.

B. EVALUATION OF ENVIRONMENTAL IMPACTS – HISTORIC RESOURCES

Environmental Setting

A Historic Resource Evaluation was conducted for the Allen School by William Kostura in March 2020 (Appendix C to this EIR). The analysis in this section is derived from that report. The full Evaluation is available for review at the District offices.

Decima M. Allen School is a complex consisting of seven buildings plus covered walks, landscaping, and playgrounds. Four of the buildings are classroom buildings that are oriented east-west and are closely parallel to each other. On original plans they are named Unit 1 (closest to Angus Avenue), Unit 2, Unit 3, and Unit 4. Units 1 and 2 were built in 1941 and are wood-framed in construction, while Units 3 and 4 were built in 1945-1946 and are reinforced concrete in construction. All four buildings share a close resemblance in their style and exterior materials. Three more buildings were designed in 1953 and built in 1956. These are the Administration Building, the Multi-purpose Building, and the Kindergarten (now the Media Center). Original plans for these three buildings are dated 1953, but in multiple sources the school district states they were built 1956.

Long covered walks, or breezeways, run along the south sides of units 2, 3, and 4. Another covered walk, most likely built in 1946, connects the four classroom buildings on their east sides. Finally, one more covered walk was built along the west side of the complex in 1956; it connects all of the buildings except for the Kindergarten/Media Center.

The buildings were built to designs by the San Francisco architects Masten and Hurd (in association with architect James H. Mitchell in 1945). The major alteration that has occurred is the replacement of wooden window sash with aluminum sash in the longest building (Unit 1) in 1999-2000.

In summary, Allen School is characterized by long, narrow one-story buildings whose massing steps down the hillside, and whose interiors are illuminated by long bands of windows that give the complex its International style of architecture. All of the buildings except one are connected by covered walks, or breezeways, whose roofs are supported by steel poles. This type of school design became extremely common in northern California in the 1950s, as well as across the United States. The oldest part of Allen School, namely the two more northern classroom buildings, were built in 1941, and is one of the two earliest known schools of this type in northern California.

The firm of Masten and Hurd was one of the earliest practitioners of the International style in northern California, and Allen School is one of the two earliest works in this style by these architects. Because Allen School was one of the first examples of a modern school design that became extremely common, and because of the importance of Masten and Hurd as designers in the International style, this property appears to be eligible for the California Register of Historical Resources at the regional level under Criterion 3, for its design. The Periods of Significance are the design and construction dates, 1941, 1945-1946, and 1953.

Regulatory Setting

State Office of Historic Preservation

The State of California implements the National Historic Preservation Act (NHPA) of 1966, as amended, through its statewide comprehensive cultural resources surveys and preservation programs. The Office of Historic Preservation (OHP), within the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. OHP also maintains the California Historical Resources Inventory. State Historic Preservation Office (SHPO) is an appointed official who implements historic preservation programs within the state.

California Register of Historical Resources

According to PRC 5020.1(j), “historical resource” includes: (1) a resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the CRHR (PRC Section 5024.1); (2) a resource included in a local register of historical resources, as defined in PRC Section 5020.1(k) or identified as significant in a historical resource survey meeting the requirements of PRC Section 5024.1(g); and (3) any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided the lead agency’s determination is supported by substantial evidence in light of the whole record (14 California Code of Regulations [CCR] Section 15064.5[a]). Generally, resources must be older than 45 years to qualify for listing on the CRHR.

The CRHR is “an authoritative listing and guide to be used by State and local agencies, private groups, and citizens in identifying the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change” (PRC Section 5024.1[a]).

The criteria for CRHR eligibility are based on NRHP criteria (PRC Section 5024.1[b]; CCR, Title 14, Section 4850 et seq.). Certain resources are determined by the statute to be automatically included in the CRHR, including California properties formally determined eligible for, or listed in, the NRHP.

To be eligible for the CRHR, a prehistoric or historic-era property must be significant at the local, state, and/or federal level under one or more of the following four criteria. The resource:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

An eligible resource for the CRHR must meet one of the criteria of significance described above and retain enough of its historical character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance.

Additionally, the CRHR consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The CRHR automatically includes the following:

- California properties listed in the NRHP and those formally determined eligible for the NRHP;
- California Registered Historical Landmarks from No. 770 onward; and
- California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the CRHR.

Resources that may be nominated to the CRHR include:

- Historical resources with a significance rating of Category 3 through 5 (properties identified as eligible for listing in the NRHP, the CRHR, and/or a local register);
- Individual historical resources;
- Historical resources contributing to historic districts; and
- Historical resources designated or listed as local landmarks or designated under any local ordinance, such as a historic preservation overlay zone.

Under CEQA Guidelines Section 15064.5(b)(3), when a project follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings to address potential impacts to historical resources, it is considered to mitigate those impacts to a level of less than significant. The Secretary of the Interior's Standards for the Treatment of Historic Properties are summarized under "Significance Criteria" in Section 3.2.3 below.

Regarding the proper criteria of historical significance, CEQA Guidelines (Section 15064.5(a)(1-3)) mandate that "a resource shall be considered by the Lead Agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (CRHR)."

Environmental Impacts and Mitigation Measures

Significance Criteria

The following significance criterion is from Appendix G of the CEQA Guidelines and is used to determine the level of impacts to historical resources. The proposed project would result in a significant impact if it would:

- Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines, Section 15064.5; or,
- Result in the elimination of important examples of the major periods of California history or prehistory (CEQA Guidelines Section 15065(a)(1)).

Impacts of the proposed project relating to Appendix G significance criteria for other cultural resources were assessed in the Initial Study checklist to be less than significant, and not requiring further analysis within this EIR (refer to Appendix A for consideration of other CEQA significance criteria).

Approach to Analysis

The above significance criterion is used as the basis for determining the significance of impacts to historical resources. Once a historical resource has been evaluated as significant, it must be determined whether the impacts of the project would “cause a substantial adverse change in the significance” of the resource (CEQA Guidelines Section 15064.5[b]). A substantial adverse change in the significance of a historical resource means “physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of [the] historical resource would be materially impaired” (CEQA Guidelines Section 15064.5[b][1]). A historical resource is materially impaired through the demolition or alteration of the resource’s physical characteristics that convey its historical significance and that justify its inclusion in (or eligibility for inclusion in) the CRHR or a qualified local register (CEQA Guidelines Section 15064.5[b][2]).

Impact Analysis

Impact HIST-1: The proposed project would result in the elimination of a historical resource (Significant and Unavoidable).

The Historic Resources Evaluation conducted for the project evaluated the Allen School for significance under the federal standards summarized above. That evaluation is discussed below.

Criterion 1: *Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.*

Discussion: This is the oldest surviving school in San Bruno. It dates only to the 1940s and 1950s, however, and thus does not represent San Bruno’s early history. Its modest age does not seem very significant, and for this reason, the subject property does not appear to be eligible for the California Register under this criterion.

Criterion 2: *Resources that are associated with the lives of persons important to local, California, or national history.*

Discussion. Principals and teachers associated with this school have not been researched. To do such research would take an enormous amount of time and work, and it seems unlikely that these would have historical importance under this criterion of the California Register. The one person whose association with this school is known is Decima M. Allen. Her importance in San Bruno's history, both as a librarian and as a school board member, is well-established, but two other buildings, the library and the school district's administration building, evoke her memory more significantly. For this reason, the subject property does not appear to be eligible for the California Register under this criterion.

Criterion 3: *Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.*

This school complex's International style, its form of narrow, one-story buildings that step down the hillside, and the use of steel poles to support the roofs of covered walks, were established when Unit 1 and Unit 2 were built in 1941. Units 3 and 4 continued this style and form when they were added in 1945-1946. The three buildings of 1956 have enough features in common with the older buildings that the entire complex forms a consistent ensemble, one that is tied together by the covered breezeways.

This complex is important because it is the second earliest school of this style and form that is known of in the San Francisco Bay Area — after Acalanes School in Lafayette — and is the oldest that is known of on the San Francisco peninsula. The oldest part of Acalanes, which established the school style in this region, was built less than two years before the oldest part of Allen School. The style and form of these schools is important in architectural history because they became extremely common in schools around not only northern California, but around the United States. These two schools were pioneers of what became a very common style.

This school complex is also significant under this criterion as one of the earliest International style works by the San Francisco firm of Masten and Hurd, who were important pioneers of Modernism in northern California. One work of theirs, Gompers School on Bartlett Street in San Francisco (1939), is a slightly earlier example of the International style than this one is, but the 1941 date of Allen School's Units 1 and 2 is still very early.

For the most part, the buildings in this complex do not possess strong aesthetic appeal. Aesthetically, the best aspects of the property are the way the massings of Units 1 through 4 step down the hillside, the presence of a long lawn in front of Unit 1, and the bowed wooden ceiling of the Multi-purpose Building. For the most part, however, the buildings, with their stucco walls and lack of fine detailing, are bland. It is for its historical importance as a pioneer in this style of school building, and as an early example of the Modernist work of Masten and Hurd, that this complex possesses historical importance.

Accordingly, the property appears to be individually eligible for the California Register under this criterion, at the regional level. The Period of Significance is 1941, 1945-1946, and 1956, the years the complex was built. Contributing elements of the historic property are all seven of the buildings, the covered breezeways, the lawn in front of Unit 1, and the courtyard spaces between Units 1 through 4. The aluminum sash in Unit 1 and the altered entrance of the Administration Building are non-contributing features, and the altered aspects of the courtyards are also non-contributing.

Criterion 4: *Has yielded, or may be likely to yield, information important in prehistory or history.*

This criterion is not applicable to the school, as it is not a prehistoric site and has a fully known history.

The proposed project would demolish the existing buildings, therefore it would result in a **significant unavoidable impact** under the CEQA's established significance criteria.

Mitigation Measures

Mitigation HIS-1: Prepare HABS Style Report. Although it would not be possible to mitigate the project impacts to historic resources to a less-than-significant level, CEQA requires that all feasible mitigation measures be implemented, even for significant unavoidable impacts.

A commonly-used partial mitigation for the demolition of a historic building is a HABS (Historic American Buildings Survey) report that would go to the Library of Congress. The text of the report includes a detailed building description, a history of the building, and a historic context that puts all of the above in perspective. The Historical Evaluation prepared for this EIR includes a summarized version of this information, but a HABS report does so more robustly, in more detail. Its purpose is to preserve the history and the architecture of the building for posterity.

The official format for a HABS report is either a narrative format or an outline format. These formats may be unwieldy and difficult to read. Therefore, the architectural historian recommends a format that includes all of the information typically found in a HABS report, but that is more user-friendly.

In addition to HABS reports and photographs, other kinds of mitigations are sometimes pursued. One is an exhibit to be placed in a museum or in the new building that replaces the old one. Another is the retention on site of an evocative fragment or fragments of the old building.

Therefore, the following measures are recommended by the project architectural historian:

A HABS-style report shall be prepared. This report need not be in an official HABS format, but should include all of the information required in a HABS report, including:

- Building name and location
- Statement of Significance
- Identify the author of the report; and identify the photographer, if different from the author
- Statement explaining why this report has been produced
- Dates of design and construction. Explain when the various buildings and covered walks were designed and built. Identify dates of major alterations.
- Profiles of the architects, Masten & Hurd and James H. Mitchell. The existing historic evaluation contains most of this information, however additional illustrations of their works, especially from the late 1930s on, should be included.
- Historical context: Schools in San Bruno. Photographs of the modern-era schools should be added to the history provided in the current architectural evaluation.
- Changes in school design, 1900s-1950s. To the history that I related in my evaluation, a larger, nationwide perspective should be added. This part of the report should be illustrated with photographs of Streamlined Moderne and early International style (1930s-1950s) California schools.
- Additional historic information of Edgemont/Allen School, if such information is available at the school or at the school district's offices; this may include:
 - A list of all of the school principals back to 1910, and the years they served, would be desirable.
 - If any teachers received awards, or were especially beloved by the students, stating that would be desirable as well.
 - A biographical sketch of Decima M. Allen, and a photograph of her if one is available.
- Physical description of the buildings and grounds, including some interior spaces. These would be described in more detail than what I wrote in my evaluation. Unit 1 would receive the most robust treatment. Units 2, 3, and 4 need not be described in as great detail, but differences between them and Unit 1 should be carefully described. The Administration Building, the Multipurpose Building, and the Kindergarten/Media Center should all be described in detail. The covered walks or breezeways, the front lawn, and the courtyards should be described sufficiently to indicate their general character.
- Photographs and plans of Edgemont/Allen School. Depending on your budget, these could be HABS-level archival b&w photographs; or high-density color digital photos printed and also on CDs. If the former, a professional photographer experienced in archival photography should be hired. These photos should be of:
 - all four sides of Unit 1 and Unit 2
 - the south side of Unit 4
 - deck shots of the covered walks alongside of units 2, 3, or 4
 - ceiling detail of one of the above covered walks
 - roofline detail
 - window in Unit 1 showing altered sash

- window in Unit 2, 3, or 4 showing original wooden sash
- a typical steel door in units 1, 2, 3, or 4
- the hallway in Unit 1
- a typical classroom interior
- all three visible sides of the Administration Building
- original window in the north side of the Administration Building
- all four sides of the All-purpose Building and the Kindergarten/Media Center. These may be taken as perspective views, capturing two sides in one shot.
- interior of the All-purpose Building
- ceiling of the All-purpose Building
- the covered walk connecting the east sides of units 2, 3, and 4
- the covered walk along the west side, view looking east
- the covered walk along the west side, deck shot
- the lawn in front of Unit 1
- one or more of the courtyards between units 2, 3, and 4
- the paved playground
- In addition to current photographs, the following illustrations should be used:
 - 1949 Sanborn map (in my historical evaluation)
 - current plot plan (in my historical evaluation)
 - photographs from original blueprints

This report should be placed in the following places:

- San Bruno Public Library
- San Mateo County Historical Archives, in the San Mateo County Museum
- Environmental Design Library, Wurster Hall, University of California, Berkeley and/or
- Documents Collection, College of Environmental Design, Wurster Hall, University of California, Berkeley

Additional Recommended Measures

Preservation of Original plans

The original blueprint drawings for the school survive. If the school district does not need them, selected sheets (elevations, plot plans, floor plans) could be offered to the Documents Collection, College of Environmental Design, Wurster Hall, University of California, Berkeley. Their preservation would be valuable because of the historical significance of this school's design.

Preservation of a Fragment of the Original Building

In front of the Administration Building there is a wall on which the name of the school is spelled in metal letters. Preservation of this wall could help to evoke the memory of this school if space is available on the grounds of the new building.

IV. OTHER CEQA TOPICS

A. Effects Found Not to be Potentially Significant

An Initial Study (IS) was prepared prior to preparation of the Draft EIR. That IS identified a number of potentially significant impacts that could be mitigated to a less-than-significant level by implementation of mitigation measures identified in the IS. The sole remaining significant unavoidable impact was the loss of the historic buildings on the site. In addition, a Notice of Preparation (NOP) was circulated for the Project beginning on March 13, 2020. Written comments received on the NOP during the scoping period, which ended on April 14, 2020 were considered in developing the scope and content of the environmental resources and topics to be studied in this EIR. Those comments did not identify any other potentially significant impacts beyond those identified in the IS. The historic resources impacts are described in Section III of this EIR. The discussions for each of the environmental topics listed below summarize potentially significant impacts identified in the IS, and identify any applicable mitigation measures from the IS analyses that would reduce significant environmental effects of the Project.

Aesthetics

The proposed replacement buildings, parking lot, and play areas would not affect views from or to nearby hillsides or ridgelines. Views of the proposed buildings would be available from the existing houses to the west, south, and north. Existing views of buildings from residences Angus and Elm would be replaced by views of landscaped play areas and the new drop-off lanes.

Views from houses immediately to the south of the school would include replacement building and the parking lot. The dense row of trees and shrubs that visually buffer those houses from views of the school facilities would be removed by the project and replaced with small trees that would eventually grow to re-create the existing visual buffer. In the interim, the existing solid fence at the site's southern edge would continue to partially limit views of the school and the new parking lot on that side of the school. The change in views of the school from those houses would be substantial, but not necessarily significantly adverse in the urban context. Mitigation Measure AES-1, below is intended to assure that this impact would be less than significant. There would also be lighting associated with the parking lot. That lighting would be designed, shielded, and aimed to avoid substantially impacting residents of the adjacent homes.

There are no rock outcroppings, historic buildings, or scenic highways on or immediately adjacent to the project site. There are also no designated scenic highways with views of the site. Therefore, the Project would have a less-than-significant on scenic vistas or scenic resources.

Mitigation Measure AES-1: A tree replacement plan shall be developed in consultation with the City's Arborist and implemented by the District. The

proposed plan would include replacement of District-protected trees with large specimen trees. (24" or 36" box). A minimum 1 to 1 replacement shall occur, with 2 to 1 replacement if determined to be feasible by the Project landscape architect. To the extent feasible, mature native trees at the perimeter of the site (identified in the project's arborist report) shall be preserved.

Air Quality and Health Risk

The Project would renovate and expand existing elementary school, kindergarten, and day care facilities on a site that has contained similar educational facilities serving the San Bruno School District for over 100 years. Although the new facilities would support a student/pre-school enrollment about 25% greater than the existing facilities, it would not have the potential to substantially affect regional housing, employment, and/or population levels in San Mateo County or the Bay Area, which are the bases of the 2017 Plan regional emission inventories and control strategies. Project construction will comply with the CALGreen (Title 24), the statewide building energy code, a control strategy promoted by the 2017 Plan.

Compliance with BAAQMD-approved CEQA thresholds of significance is another condition for determining Project consistency with 2017 Plan control measures. Thus, the Project would have less-than-significant air quality impacts because it meets all BAAQMD CEQA emission thresholds

The IS Air Quality assessment contained calculations of exhaust air-pollutant emissions for all Project phases from construction equipment, haul/delivery trucks and worker commute vehicles. Those calculations were then compared with the BAAQMD CEQA significance thresholds. No project emissions exceeded BAAQMD significance thresholds, therefore this impact would be **less than significant**, and no mitigation is required.

A Health Risk Screening Assessment was conducted for project emissions. That assessment found that the cancer risk from Project construction dust and particulate matter (DPM) at the existing adjacent residential uses most exposed to TACs from Project construction would be 2.67 additional cancer cases per million people exposed, which is below the project-level CEQA threshold for cancer risk. The Hazard Index from Project construction DPM would be 0.007, which is well below the BAAQMD threshold for chronic hazard. But the modeled annual PM_{2.5} concentration from Project construction would be 0.34 µg/m³, which exceeds the Project-level CEQA threshold (0.3 µg/m³).

Implementation of Mitigation Measure AQ-1, below, would assure that annual average PM_{2.5} concentrations at the existing adjacent residential receptors due to Project construction would be well below the CEQA PM_{2.5} threshold (and would substantially reduce cancer risk and chronic hazard, as well), as also shown in Table AQ-6. With this mitigation measure, this impact would be reduced to a less-than-significant level.

After it is operational, the Project would not include substantial stationary TAC emission sources nor add substantial mobile TAC emission sources (i.e., by BAAQMD definition, daily incremental traffic volumes of 10,000 or more).

Project operation would not introduce substantial sources of odor emissions to the area.

Mitigation Measure AQ-1. The Project construction contractor shall implement the following measures to further reduce construction-related diesel particulate exhaust emissions:

- All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
- All Project diesel-powered construction equipment shall have engines rated at least EPA Tier 3, with Tier 4 equipment substituted wherever possible to obtain the maximum possible DPM emissions reduction from Project equipment.

Biological Resources

The project site is a fully developed school campus in a completely urbanized neighborhood. There are a few ornamental trees near the existing school buildings, and stands of large native and non-native trees along the western, southern, and eastern site perimeters. The project site is in a developed condition and does not contain any natural habitats, noise and activity levels on the site are high due to school activities and regular use of the athletic field, the site is in an urban area and is isolated from open space/natural habitats; these factors limit the potential for special-status species to occur. However, special-status birds have the potential to occur on the project site. The active nests of most native bird species are protected by the Migratory Bird Treaty Act (16 U.S.C. 704) and the California Fish and Game Code (Section 3503). Various common bird species, including raptors (e.g., Cooper's hawk), could nest in the trees on the site. Therefore, in the absence of avoidance measures, active nests of birds protected by the Migratory Bird Treaty Act and California Fish and Game Code could be disturbed by tree removal or by construction-related noise. The implementation of Mitigation Measure BIO-1, below, and AES-1, above, would reduce the impact to protected bird nests to a less-than-significant level.

Mitigation Measure BIO-1: Wherever possible, any tree removal should occur during the period of September 1 to January 31, which is outside of the nesting season. If construction activities and/or tree removal would commence anytime during the nesting/breeding season of native bird species potentially nesting near the site (typically February through August in the project region), a pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks of the commencement of construction activities. If construction during the nesting season ceases for more than 10 days or moves to a new locale on the site, nesting bird surveys shall be conducted prior to the restart of work.

If active nests are found in areas that could be directly affected or are within 200 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance 50-foot buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged.

Cultural Resources

A cultural resources analysis was conducted for the site. No cultural resources were encountered. However, it is important to note that surface pedestrian surveys cannot always determine what archaeological resources might be present in subsurface contexts. Such buried resources have the potential to be California Register of Historic Resources (CRHR) - eligible and as such any impacts to them would be considered a potentially significant impact. Mitigation Measures CULT-1 would reduce this potentially significant impact to a **less-than-significant** level.

Although no prehistoric or historic-era human remains have been identified within or near the project site, it is possible that presently undocumented human interments may be uncovered during excavation activities. This **potentially significant** impact would be a potentially significant. Implementation of Mitigation Measures CULT-2 would reduce this impact to a **less-than-significant** level.

Mitigation Measure CULT-1: Archaeological Deposits. If an inadvertent discovery of cultural materials (e.g. unusual amounts of shell, animal bone, bottle glass, ceramics, structure/building remains, etc.) is made during project-related construction activities, ground disturbances in the area of the find shall be halted within a 50-foot radius of the discovery and a qualified archaeologist must be retained to document the discovery, and assess its significance. The archaeologist shall determine whether the resource is potentially significant as per the CRHR and recommend treatment. Any recommended treatment shall be implemented.

Mitigation Measure CULT-2: Human Remains. In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the San Mateo County Sheriff/Coroner and a qualified professional archaeologist. The Sheriff/Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist shall consult with a Most Likely Descendent (MLD) determined by the NAHC regarding the

removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity. Construction activities shall not resume until either the human remains are exhumed, or the remains are avoided via Project construction design change.

Soils and Geology

The site would be subject to moderate to strong ground shaking in the event of a major earthquake on any of the regional fault zones. Due to its close proximity, the San Andreas Fault (approximately 1.75 miles southwest) presents the highest potential for strong ground shaking. This shaking could damage improperly constructed buildings and cause ground failures that also could affect the structure and infrastructure (these ground failures are discussed below). This impact is potentially significant but can be reduced to a less-than-significant level with implementation of Mitigation Measure GEO-1, below.

The project geotechnical assessment evaluated the site for liquefaction potential and determined that it could be subject to total settlement of up to 1.7 inches, with differential settlement up to about 0.8 inches, over 30 feet, on the site. That assessment also evaluated the potential for lateral spreading, seismic-induced ground settlement, and lurching and ground cracking on the site and determined those not to pose a significant risk to the proposed buildings.

The impact associated with liquefaction and differential settlement hazards would be reduced to a less-than-significant level by implementation of Mitigation Measure GEO-2, below.

If grading were to occur during the rainy season, substantial erosion could result. Mitigation Measure HYDRO-1, in the Hydrology and Water Quality section of this document and Mitigation Measure GEO-3, below, would reduce this impact to less than significant.

Mitigation Measure GEO-1. The project structures and foundations shall be designed in accordance with the most recent version of the California Building Code. Recommended seismic coefficients provided in the Miller Pacific geotechnical report shall be included in the project design.

Mitigation Measure GEO-2. The project's site clearing, site preparation, subgrade preparation and stabilization, fill, drainage, and foundation systems shall be designed and constructed per the specifications set forth on the project geotechnical report (Miller Pacific 2019).

Mitigation Measure GEO-3. The project shall include a site drainage system to collect surface water and discharging it into an established storm drainage system. The project Civil Engineer or Architect shall be responsible for designing the site drainage system and, an erosion control plan could be developed prior to construction per the current guidelines of the California Stormwater Quality Association's Best Management Practice Handbook.

Hazards and Hazardous Materials

The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962 (Cortese List)¹. However, the existing buildings proposed for demolition and removal may have lead-based paint (LBP), polychlorinated biphenals (PCBs), and/or asbestos-containing materials (ACM), which can pose health hazardous when disturbed or transported. The District would conduct a screening for these materials prior to demolition. Any demolition materials with LBP, PCBs, or ACM would be stabilized and/or appropriately contained prior to transport as described in Mitigation Measure HAZ-1, below. On-site storage and/or use of large quantities of materials capable of impacting soil and groundwater would not typically be required for this type of project. Therefore, risk of contamination from upset would be mitigated to a less-than-significant level.

Mitigation Measure HAZ-1. Prior to demolition of buildings on the project site, a full asbestos and lead based paint survey of the buildings shall be performed by qualified asbestos and lead-based paint inspectors/consultants. If containing materials or lead-based paints are identified at any of the site buildings proposed for renovation and or demolition, standard asbestos and lead-based paint abatement and dust control measures shall be implemented in compliance with OSHA and Cal/OSHA statues. This work shall be performed at a minimum with the controls and work practices described in Title 8 CCR 1532.1, which describes work, practices and respiratory protection. At a minimum, prior to demolition, any ACM and/or LBP shall be stabilized, and demolition of building materials that have potential contaminants be placed in appropriate covered containers prior to off-site removal to reduce the potential for airborne emissions. Similarly, the existing buildings shall be surveyed for PCB-containing equipment, light ballasts, and light tubes, and any such equipment shall be removed and disposed of appropriately prior to building demolition. All removal of potentially contaminated materials shall be conducted only by qualified personnel with appropriate training and certifications.

Hydrology

The District would be required to develop and implement a Construction Stormwater Pollution Prevention Plan (SWPPP) that identifies appropriate construction BMPs in order to minimize potential sedimentation or contamination of storm water runoff generated from the Project site during construction. The SWPPP would identify the risk level for erosion and sedimentation and how much monitoring of potential pollutants is required. Implementation of a SWPPP as required would ensure that the construction of the proposed Project would not violate any water quality standards or waste discharge requirements and reduce potential impacts to a less-than-significant level, as described in Mitigation Measure HYD-1.

Potentially contaminated runoff from the new impervious areas would occur. Implementation of the Construction General Permit SWPPP requirements described

¹ https://www.envirostor.dtsc.ca.gov/public/map/?global_id=43990007

above, as well as Mitigation Measures HYD-1 and HYD-2, below, would reduce the other water quality impacts described above to a less-than-significant level.

Mitigation Measure HYD-1: Prior to the issuance of grading permits for the proposed Project, the Project engineers shall prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the Project site during construction.

Mitigation Measure HYD-2: The District shall prepare a long-term Stormwater Control Plan for the project site. It shall maintain in perpetuity the post-construction BMPs listed in the Stormwater Control Plan. The District shall make changes or modifications to the BMPs to ensure peak performance. The District shall be responsible for costs incurred in operating, maintaining, repairing, and replacing the BMPs. The District shall conduct inspection and maintenance activities and complete annual reports.

Noise

The Project site is less than a mile west of San Francisco International Airport (SFO). One of SFO's main aircraft departure routes follows the northwest-southeast orientation of two of its four main runways and departing flights regularly and often overfly the northeastern parts of San Bruno. But the Project site is about half a mile south of this "line of departure" and about a quarter mile south of SFO's 65 dBA CNEL contour, as shown in the portion of the CLUP map included here as Figure NOI-1. While flights on low-level departures from SFO do not overfly the Project site, they do come close. During mid-morning and early afternoon periods of the site survey, many departures of large commercial jets were observed averaging one every five to ten minutes. Even with this observed frequency of aircraft departures and their proximity to the Project site, daily average aircraft noise levels on the Project site are just below 60 dB CNEL, as shown in the San Bruno General Plan map included here as Figure NOI-2. Short-term noise measurements taken during the Project site survey indicate that mid-day average noise levels in the mid-60s dB are common along local streets, and that are peak noise intrusions from aircraft in the mid- to upper-70s dB are a common occurrence on and around the Project site.

Thus, noise exposure data in the San Bruno General Plan and Project-specific noise measurements indicate, at best, that current on-site noise levels are at the upper end of the General Plan's "Normally Acceptable" range. Due to the high natural variability of environmental noise levels (i.e., higher noise levels than those measured during the site survey probably occur on occasion) and the likelihood that future noise in downtown San Bruno will grow, noise levels on/around the Project site cannot be confidently expected to remain in the Normally Acceptable range. Project plans should accommodate the probability of higher future noise exposure.

The World Health Organization (WHO, Guidelines for Community Noise, 1999) recommends a school-day average of 35 dB Leq for school classroom/library space to reduce student/faculty/staff annoyance from external noise sources, increase speech

intelligibility, and facilitate information acquisition. Without adequate acoustical insulation, the new school/library buildings would not attain the interior noise exposure standard necessary for users to fully avail themselves of the new school's resources. But with implementation of Mitigation Measure NOI-5, the Project's interior noise levels would be reduced and the impact from noise intrusions would be less than significant.

Mitigation Measure NOI-1: The following noise-control Best Management Practices shall be incorporated into the construction documents to be implemented by the Project contractor:

- Provide enclosures and noise mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy activity areas on the site.
- Use quietest type of construction equipment whenever possible, particularly air compressors.
- Provide sound-control devices on equipment no less effective than those provided by the manufacturer.
- Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors.
- Prohibit unnecessary idling of internal combustion engines.
- Designate a noise disturbance coordinator at the San Bruno Park School District who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site. Copies of the project purpose, description and construction schedule shall also be distributed to the surrounding residences.

Mitigation Measure NOI-2: Further restrictions shall be placed on hours of Project construction activity than those allowed under the Municipal Code. Thus, construction activity shall be limited to weekdays between 7 AM and 6 PM, and prohibited on weekends and all holidays observed in the City of San Bruno.

Mitigation Measure NOI-3: If at any times when school is in session that construction equipment needs to operate near on-site noise-sensitive school receptors (i.e., classrooms, staff offices, the library), the Project contractor shall consult with the school principal/faculty/staff to arrange for a temporary relocation of the said receptors to minimize disruption to educational activities while the work is completed.

Mitigation Measure NOI-4: All heavy trucks delivering building supplies or off-hauling excavated soil or demolition debris shall exit the site to Linden Avenue and proceed directly to El Camino Real and on to area freeways, thereby

avoiding residential areas facing Elm Avenue, Angus Avenue and any other neighborhood local streets.

Mitigation Measure NOI-5. To assure that average interior noise levels within the new school's class rooms and library achieve the WHO-recommended indoor noise exposure standard of 35 dBA Leq during its operating hours, the new Project structure shall have sound-rated walls, windows and exterior doors adequate to achieve WHO noise standards. This shall be verified by a Project building-specific acoustical analysis by its engineers/architects during the final Project design phase. The results of the analysis, including the description of the necessary noise control features to attain the standard, will be submitted to the City along with the final building plans and approved prior to issuance of a building permit.

Transportation and Traffic

A transportation study was prepared for the project by PHA Transportation Consultants (PHA January 2020). This study is available for review at the School District offices. The study scope, designed to identify the potential project impact on area traffic circulation, was reviewed, refined, and approved by City of San Bruno staff.

The proposed replacement school would increase current capacity from about 400 to 500 students. Based on the ITE trip generation rates, the project would generate about 50 and 38 trips during morning drop-off and afternoon pickup times respectively. This level of traffic would not have the potential to significantly affect traffic conditions on the current street system. The Level-of-Service at all of the potentially affected street intersections would remain at LOS A and C with the added project traffic. The proposed replacement school would not change or affect current traffic operation and circulation in the area in any noticeable way and would not result in any conflicts with any established plan or policies.

There were 18 reported traffic collisions near the study area over the past three years (2016-2018) but none occurred near the school. The two key street intersections West Angus Avenue at Elm and Linden Avenues next to the school campus are controlled by all-way-stop signs with high visibility pedestrian crosswalks. School staff supervise and assist students crossing during drop-off and pick-up periods. The project would not change any street traffic patterns or have any conflict with any established transportation, circulation or safety plans for the area. As such, project traffic and safety impact would be less than significant.

No mitigation measures are required for traffic impacts of the project.

Growth Inducement

The CEQA Guidelines (Section 15125(g)) require that an EIR evaluate the growth-inducing impacts of a proposed action. A growth-inducing impact is defined by the Guidelines as "the way in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the

surrounding environment. Included in this definition are public works projects which remove obstacles to population growth.”

The environmental effects of induced growth are secondary, or indirect, impacts of the proposed action. Secondary effects of growth include increased demand on community services and infrastructure, increased traffic and noise, and conversion of agricultural and open space to development use. Inducement of disorderly growth that is inconsistent with local land use plans generally causes significant environmental impacts.

The proposed project would consolidate students from two schools (the existing Allen School and the Hesselgren Preschool). Therefore it would not substantially increase school capacity in the area. Construction employment would be minimal and temporary. Based on the above, the project would not have a significant growth-inducing potential.

B. Cumulative Impacts

In evaluating potential environmental impacts, CEQA requires that the project be considered within the context of regional development. While the environmental effects resulting from an individual project may appear less than significant when considered alone, they may be significant when added to impacts caused by other projects in the area. Cumulative impacts are defined by CEQA Guidelines Section 15355 as “two or more individual effects which, when considered together, are considerable, or which compound or increase other environmental impacts.”

The cumulative impacts analyses in this document are made on the basis of lists of past, present, and reasonably anticipated future projects available from the City of San Bruno and the District. A major development project Mills Park Center, at the southwest corner of El Camino Real and San Bruno Avenue West, about three blocks north of the project site, has been proposed but was not approved. The has been revised as an “SB 35” proposal, which allows for streamlined approval. The current project design calls for four separate 6 and 7 story buildings with a total of approximately 600 residential units, plus up to parking spaces. As of October 2019, no formal proposal has been re-submitted to the City².

Because the Project would replace the existing school with only slightly expanded facilities, it would not contribute in a cumulatively considerable manner to any impacts of the Mills Park Center project, should it be approved. All project construction impacts would be limited to the project site and immediately surrounding streets. Long-term impacts would not extend beyond this area as well. Therefore, the proposed project would not contribute in a cumulatively considerable manner to any impacts associated with the Mills Park Project, and this impact would be **less than significant**.

² <https://www.sanbruno.ca.gov/civicax/filebank/blobdload.aspx?BlobID=31231>

C. Significant Unavoidable Adverse Impacts

After mitigation, project implementation would have the following unavoidable significant adverse impacts:

- Loss of the significant historic resource of the existing school buildings.

V. ALTERNATIVES TO THE PROJECT

A. GENERAL CEQA REQUIREMENTS FOR ALTERNATIVES

CEQA requires that a reasonable range of feasible alternatives to the proposed project be described and considered within an EIR. The alternatives considered should represent scenarios that could feasibly attain most of the basic objectives of the project, and would avoid or substantially lessen any of the significant environmental effects of the project. The purpose of this process is to provide decision makers and the public with a discussion of viable development options and to document that other options to the proposal were considered within the application process (CEQA Guidelines, §15126.6).

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Where a lead agency has determined that even after the adoption of all feasible mitigation measures, a project as proposed would still cause significant environmental effects that cannot be substantially lessened or avoided, the agency, prior to approving the project as mitigated, must first determine whether, with respect to such impacts, there remain any project alternatives that are both environmentally superior and feasible within the meaning of CEQA. CEQA provides the following guidelines for discussing project alternatives:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (§15126.6(a)).
- An EIR is not required to consider alternatives that are infeasible (§15126.6(a)).
- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project (§15126.6(b)).
- The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects §15126.6(c)).
- The EIR should briefly describe the rationale for selecting the alternatives to be discussed §15126.6(c)).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project §15126.6(d)).

B. PROJECT ALTERNATIVES

A range of alternatives is presented in this document for the consideration of the public and decision-makers.

Alternatives Evaluated in this EIR

The Proposed Project is described in Chapter 2 of this EIR and the impacts are evaluated in Chapter 3. Two alternatives to the Proposed Project are evaluated in this chapter: the Historic Preservation alternative, and the CEQA-mandated No Project Alternative. These are summarized below, along with their potential impacts.

Alternative 1: Historic Preservation

Under this alternative, the significant unavoidable impact of the proposed project on historic resources to a less-than-significant level, as identified by the Architectural Historian

This alternative would entail preservation of the two wings facing and closest to Angus Avenue West would adequately convey the early International style of the complex, as designed by architects Masten and Hurd. (These buildings are called Unit 1 and Unit 2 in the original plans.) Preservation of these two buildings would also preserve a sense of the spacing of the complex's buildings for the purpose of allowing light and air into the classrooms. Such spacing of one-story buildings in a school complex was a departure from blocky multi-story school buildings of the 19th and early 20th centuries. Under this mitigation plan, restoration of the window sash in Unit 1 (facing Angus Avenue) from aluminum back to wood would be implemented. Retention of the school's offices at the west end of Unit 1 (a 1953 addition) would be unnecessary.

Under this alternative, new buildings would be needed to replace the buildings to be removed. This alternative would not meet the project's goal of meeting ADA accessibility requirements, as the split-level contours of the school would be retained.

Evaluation of Impacts

Aesthetics. This alternative would reduce the aesthetic impacts of the new school because it would reduce grading and tree removal. As with the proposed project, this impact would be reduced to less-than-significant with mitigation.

Air Quality. This alternative would reduce construction air quality impacts compared to those of the proposed project. As with the project, the alternative impacts would be reduced to less-than-significant with mitigation.

Biological Resources. This alternative would reduce tree loss compared with the proposed project. Therefore it would reduce potential impacts to nesting special-status

bird species and issues associated with compliance with the District's and City's tree protection policies.

Cultural Resources. This alternative would reduce the impact to historic resources to a less-than-significant level. Potential impacts to unknown cultural resources could still occur, but would be reduced to a less-than-significant level with the mitigation measures identified, as with the proposed project.

Hazardous Materials. This alternative would reduce impacts of asbestos containing materials and lead-based paints being released into the environment compared with the project. However, because other on-site buildings would still be removed, this impact would require the same mitigation as with the project.

Hydrology and Water Quality, Geology. This alternative would not substantially change the less-than-significant long-term hydrologic impacts of the project. Construction erosion and sedimentation would be reduced under this alternative, but mitigation measures identified for the project would still be required.

Public Services and Utilities. Public services and utilities impacts would be similar to with the proposed project.

Transportation, Circulation and Parking. Transportation and circulation would be similar to existing conditions. As with the project, there would be no significant impacts.

Alternative 2: No Project

Under this alternative, the replacement school would not be developed. All construction and operational impacts associated with the proposed project would be eliminated. No significant unavoidable impacts would occur. However, none of the project's objectives would be achieved.

C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines (Section 15126.6(a) and (e)(2)) require that an EIR's analysis of alternatives identify the "environmentally superior alternative" among all of those considered. In addition, if the No Project Alternative is identified as environmentally superior, then the EIR also must identify the environmentally superior alternative among the other alternatives. Finally, under CEQA, the goal of identifying the environmentally superior alternative is to assist decision makers in considering project approval. CEQA does not, however, require an agency to select the environmentally superior alternative, nor to consider the feasibility of environmentally superior project alternatives identified in the EIR if described mitigation measures will reduce environmental impacts of the approved project to acceptable (less than significant) levels. (*Laurel Heights Improvement Association of San Francisco v. Regents of the University*

of California, 47 Cal.3d 376, 400-3 (1988); *Laurel Hills Homeowners Association v. City Council* 83 Cal. App. 3d 515 (1978), CEQA Guidelines Sections 15042–15043).

Based on the above analysis, the No Project Alternative would have the fewest impacts. The Historic Preservation Alternative would be the environmentally superior alternative under CEQA, as it would reduce the project's significant unavoidable impacts to historic resources to a less-than-significant level. However, as detailed below, it would not meet the proposed project's goal of achieving ADA compliance at the school

Units #1 and #2, which would be preserved under Alternative 2, were constructed on multiple levels to match the sloping topography of the site. The Division of State Architect now requires that all classroom facilities be ADA accessible with paths of travel that do not exceed 5% slope and 2% cross slope. Unit #1 drops approximately 16' from top to bottom. To provide a path of travel at less than 5% would require +/- 320' of concrete ramps, or more likely five separate wheelchair lifts to get from the building entry level to playground level. The referenced spacing that provides the 'light and air' into the classrooms would be replaced by concrete ramps, railings and wheelchair lifts. It is also unclear whether the Division of State Architect would approve an access plan that require a student with disabilities to endure such a circuitous route.

It would not be permissible or practical to build the planned new construction on a 16% slope. Therefore, the existing Units 1 and 2 would need to be isolated on their own sloped pad with numerous ramped transitions to the benched terraces required on the balance of the site. This would result in further hardship for students with disabilities and would replace critically needed play space with concrete ramps.

In addition, schools with significant presence of concrete ramps and railings present a safety and security risk from skateboards, BMX bicycles and scooters. If Units #1 and #2 were preserved, the surrounding area would be a high target for recreational skating with all the associated injury and security liability.

In summary, the existing Allen Elementary campus was built prior to concerns and building codes related to equal access. The buildings that would be preserved under this alternative are on a 16% slope which would need to be maintained. Code and practicality dictate that the balance of the site be terraced to limit obstacles and maximize play space. The awkward transition between the two topographies would create a hardship for people with disabilities, and the scale of required ramps, rails and lifts would virtually eliminate the architectural appeal of the existing buildings.

VI. REPORT PREPARERS

GRASSETTI ENVIRONMENTAL CONSULTING

Richard Grassetti, Principal

Geoffrey Hornek, Air Quality, GHG, and Noise Specialist

Jason Coleman, Solano Archaeological Services, Cultural and Tribal Resources

William Kostura, Architectural Historian

Richard Denney, Graphics

Greystone West Company

Todd Lee, Principal

Courtney Smith, Project Manager

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APPENDICES

- A. Notice of Preparation and Responses**
- B. Initial Study**
- C. Historic Resources Evaluation**
- D. Traffic Study**
- E. Mitigation Monitoring and Reporting Program**
- F. Comments and Responses on Draft EIR**

A. Notice of Preparation and Responses

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**NOTICE OF PREPARATION (NOP) OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
DECIMA ALLEN ELEMENTARY SCHOOL REPLACEMENT PROJECT**

PROJECT TITLE: Decima Allen Elementary School Replacement Project

SUMMARY: The San Bruno Park School District (SBPSD or "District") is preparing a focused Environmental Impact Report (EIR) for the Decima Allen Elementary School Replacement Project (Project). The District is requesting comments on the scope and content of the focused Environmental Impact Report (EIR). A description of the Project and its location, together with a summary of the probable environmental effects that will be addressed in the focused EIR, are included herein. The District is the CEQA lead agency undertaking preparation of a Draft Focused EIR for the Project. This Notice of Preparation (NOP) is being circulated to obtain agency and public input regarding the scope and content of the environmental analysis, including the potentially significant environmental issues, the proposed range of alternatives, and mitigation measures that should be included in the focused EIR.

Pursuant to California Environmental Quality Act (CEQA) Guidelines §15063(c) (3), the District has prepared an Initial Study for the Project. To identify any potentially significant impacts of the Project. The Initial Study identified only historic resources as a potentially significant unavoidable impact; all other impacts were either less than significant or can clearly be mitigated to less-than-significant levels by implementation or mitigation measures identified in the Initial Study. Therefore, the EIR will be focused solely on Historic Resources. The Initial Study will be circulated for public review as an appendix to the Focused EIR.

PUBLIC REVIEW AND COMMENT PERIOD: The District invites comments on the scope and content of the Focused EIR in response to this NOP. The District prefers that comments be submitted via email at: skamberg@sbpsd.k12.ca.us and cc msolomon@sbpsd.k12.ca.us. Comments may also be submitted via mail to the following address:

San Bruno Park School District,
Attn: Sharon Kamberg, Ed.D.
500 Acacia Ave.
San Bruno, CA 94066

Pursuant to State law, comments will be accepted for 30 days after publication of this notice. Responses to the NOP must be received via the above email address, mailing or e-mail address by 5:00 p.m. on April 12, 2020. Comments will also be received at the EIR Scoping Meetings to be held as noticed below.

Commenters should focus comments on potential impacts of the Project on the physical environment. Commenters are encouraged to identify mitigation measures that could minimize potential adverse effects resulting from the Project and to identify reasonable alternatives to the Project.

PURPOSE OF THE NOTICE OF PREPARATION (NOP): Pursuant to CEQA Guidelines §15082(a), upon deciding to prepare an EIR, the District as lead agency must issue a Notice of Preparation (NOP) to inform the Governor's Office of Planning and Research trustee and responsible agencies, and relevant federal agencies that an EIR will be prepared. This notice is being sent to responsible or trustee agencies and other interested parties. Responsible and trustee agencies are those public agencies, besides the San Bruno Park School District, that have a role in considering approval and/or carrying out the project.

The purpose of the NOP is to provide information describing the project and its potential environmental effects to affected agencies, so that they may comment on the scope and content of the information to be included in the EIR. CEQA Guideline §15082(b) states: "... [E]ach responsible and trustee agency and the Office of Planning and Research shall provide the lead agency with specific detail about the scope and content of the environmental information related to the responsible or trustee agency's area of statutory responsibility that must be included in

the draft EIR. The response at a minimum shall identify: (A) The significant environmental issues and reasonable alternatives and mitigation measures that the responsible or trustee agency, or the Office of Planning and Research, will need to have explored in the Draft EIR; and (B) Whether the agency will be a responsible agency or trustee agency for the project." Once the Draft EIR is completed, notice will be given, and the Draft EIR will be made available for review. Copies will be sent to all responsible and trustee agencies, to persons or entities who comment on this NOP, and to any person or entity that requests a copy. The Draft EIR will also be available for review at the SBPSD District Offices, at 500 Acacia Avenue, San Bruno.

Following the close of the public review period for the DEIR, the District will prepare a final EIR, incorporating and responding to all comments received during the public comment period, for consideration by the District Board of Directors, at a date for which notice shall be provided. As required by CEQA (§21092.5), the final EIR, including written responses to the comments submitted by public agencies, will be provided to commenting agencies at least 10 days prior to certification.

PROJECT LOCATION: Decima Allen Elementary School is located at 875 Angus Avenue West in the central area of the City of San Bruno, in San Mateo County (See Figure 1). As shown on Figures 2, the Allen School campus is surrounded by Angus Ave. W on the north, Elm Avenue on the west, Linden Avenue on the east, and single-family residences to the south. The City of San Bruno library, City Hall, and a fire station are directly across Linden Avenue from the school. Single family residential neighborhoods are across the street from the school to the west and north. The El Camino Real commercial strip is one block west of the school.

PROJECT DESCRIPTION: Existing school facilities include 14 standard classrooms, one special education classroom, a library, an administration building, and a multi-use room. The school campus also includes paved playfields and basketball courts, and a grass-turfed baseball field. The existing school has a capacity of about 400 students.

Many of the existing school buildings are over 60 years old and need a full modernization. Additionally, the existing site topography would make it almost impossible to meet ADA requirements. Given these combined deficiencies, the District is proposing to replace the existing buildings with new ones and recontour the site to allow ADA compliance.

The Project proposes to replace the existing school with five new buildings on the eastern and southern parts of the site, where the existing playfields are located. The site would be benched with upper and lower benches. Landscaped areas include a new amphitheater, outdoor classroom area, lunch area with picnic tables, two new play areas, and a new play field. A new parking area with 33 spaces would be provided, to be accessed from Linden Avenue. Capacity of the new school would be about 500 students, including about 75 students to be relocated from the District's Hesselgren preschool at 525 Elm Street.

ANTICIPATED ENTITLEMENTS AND APPROVALS: Implementation of the OVMP may include approvals from the following agencies:

- City of San Bruno Grading Permit;
- Regional Water Quality Control Board, San Francisco Bay Region, Construction Stormwater Pollution Prevention Plan and Permit;
- Bay Area Air Quality Management District, Approval Letter for asbestos demolition; and
- Division of the State Architect review of construction plans.

PROBABLE ENVIRONMENTAL EFFECTS AND PROPOSED SCOPE OF THE EIR: The EIR will analyze and disclose the direct and reasonably foreseeable indirect potentially significant environmental impacts of implementation of the Project (CEQA Guidelines §15126.2, §15130). Where potentially significant impacts are identified, the EIR will describe potentially feasible mitigation measures that could minimize significant adverse impacts (CEQA Guidelines §15126.4).

Topics to be analyzed in the EIR, include but are not necessarily limited to the following:

- **Historic Resources:** The existing Decima Allen Elementary School buildings have been determined to be eligible for inclusion in the National Register of Historic Places. Elimination of the existing school buildings would, therefore, represent a significant unavoidable impact under CEQA Guidelines Section 15064.5.

All other issues have been evaluated in the Initial Study and determined to be mitigable to less-than-significant levels.

Date: 3/12/2020

Signature Shaun Hamberg

Title Superintendent

Attachments: Project Location Maps and Proposed Project Site Plan

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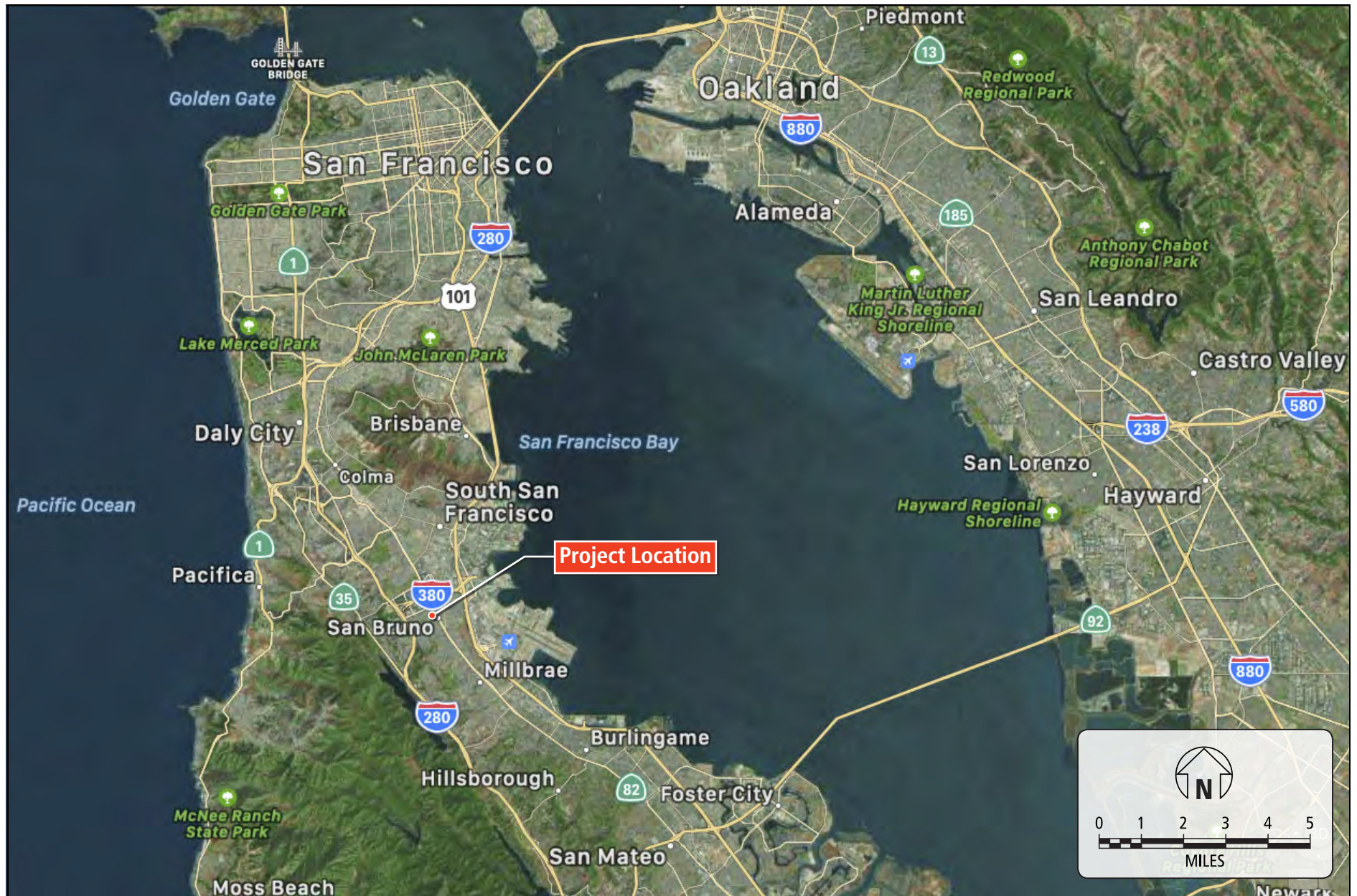


Figure 1
Project Location

Source: TomTom Maps



Figure 2
Aerial Photograph of Existing Campus and Project Site

Source: TomTom Maps

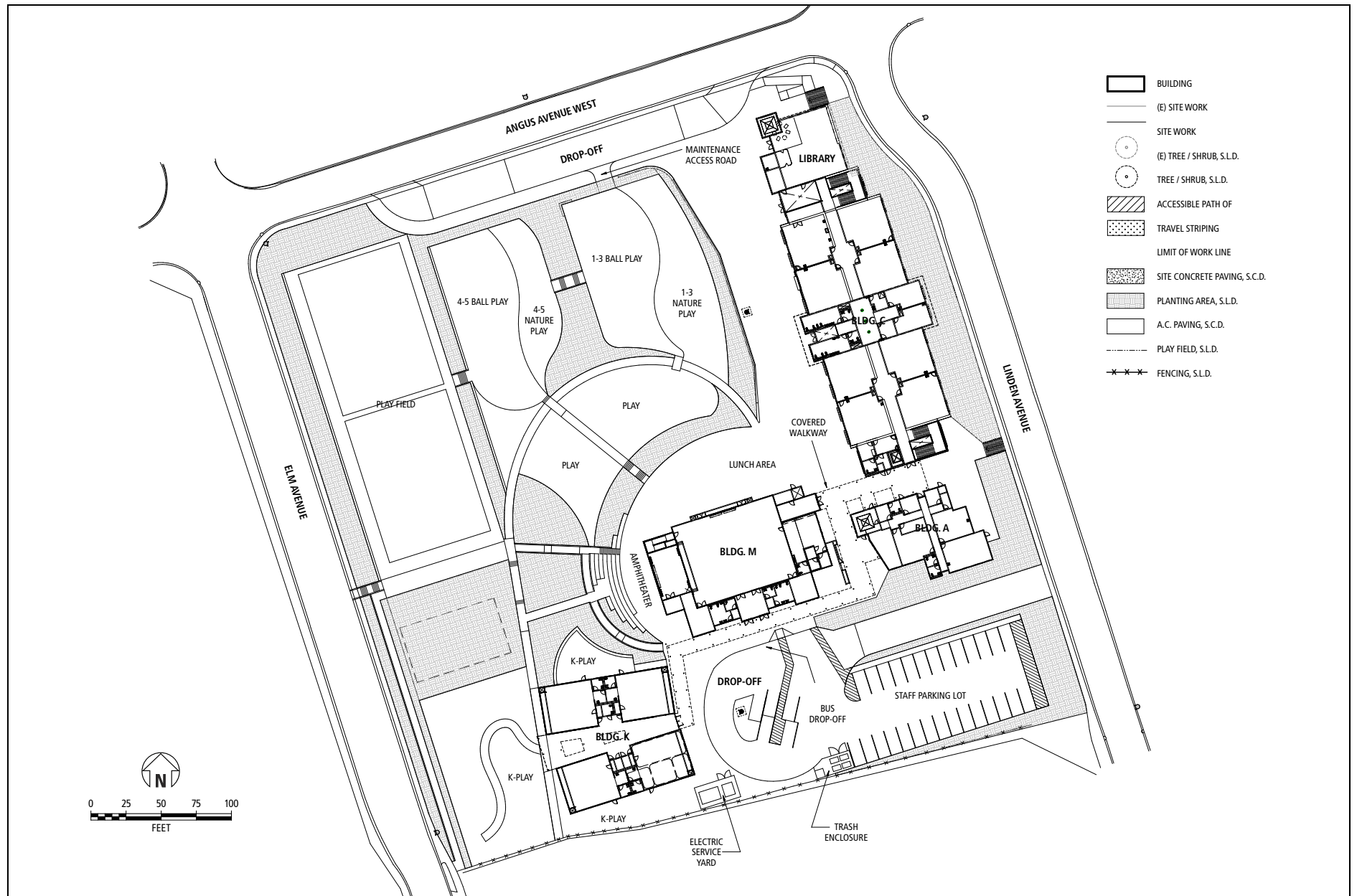


Figure 3
Project Site

Source: Hibser Yamauchi Architects, Inc.



April 10, 2020

Sharon Kamberg, Ed. D
Mariana Solomon
San Bruno Park School District
500 Acacia Ave
San Bruno, CA 94066
skamberg@sbpsd.k12.ca.us
msolomon@sbpsd.k12.ca.us

RE: Comments responding to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Decima Allen Elementary School Replacement Project.

Dear Ms. Solomon,

The City of San Bruno ("City") appreciates the opportunity to review in response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Decima Allen Elementary School Replacement Project.

In reviewing the document, the City has the following comments and questions on draft IS/MND, including the draft traffic report that were prepared in February 2020:

General Comments –

- Under Project description and project approvals (page 3), in addition to necessary review and approval from the San Bruno Park School District, any improvement proposed within the City's Public-Of-Way such as street striping, curb color will be subject to review and approval of San Bruno City Council and the City's Traffic Safety & Parking Committee's review (TSPC).
- The project will also be subject to the City's encroachment permit and/or grading permit reviews. Changes made to traffic signs, pavement markings, and other features of the public Right of Way will require approval from the City's Public Works Department and possibly the TSPC and City Council. An encroachment permit will be required to construct the approved changes. All street striping details should demonstrate compliance with City standard and be included in the encroachment permit submittal.
- All proposed changes to parking restrictions (including loading zones, time limited parking, etc.) will require review by the City's Traffic Safety and Parking Committee (TSPC) and any legal establishment of the changes will require City Council's approval and action.

Biological Resource –

- Explain if any heritage tree removal would be consistent with City's Heritage Tree Ordinance and clarify how such review will be conducted and coordinated with the City

of San Bruno's Community Service and Community and Economic Development Department Planning Division (page 32).

Transportation –

- Explain why a cumulative study was not included.
- Comments pertaining to the traffic report prepared by PHA Transportation Consultants (please note that some of the following comments have been provided to PHA prior to this letter):
 - Figure 2 shows a “Drop Off” label within the staff parking lot. This label conflicts with Section 4.5 of the report where it states that no drop-offs will take place in the staff parking lot. Please clarify.
 - The report finds that there will be no change to the traffic patterns near the school. However, with the new drop off area on Angus Avenue, parents will be encouraged to use it. Per the transportation survey, it indicates that only 18% of the existing pickup/drop offs occur on the Angus Ave curbside, while 55% of students are drop off on Elm, Linden, or other locations. This seems to indicate that traffic patterns could change significantly if more students are dropped off at the new drop off area.
 - The report describes Angus, Elm, and Linden as two-lane roadways. Those roads are two-way streets but with parking allowed on both sides, which does not allow for two lanes on the roads. Please update the descriptions of those streets to match.
 - Revise description of the City's LOS standard. Please review and apply to section 3.1.
 - Figures 4, 7 ,10 have mislabeled figures at the Jenevein Avenue and Linden Avenue intersection.
 - Report states the distribution of added trips was done consistent to the existing traffic patterns. This study should take into consideration the new drop off area and should make adjustments to the distribution to account for existing and new trips to the new drop off area.
 - Table 7 (Current Conditions + Project Traffic LOS Summary), explain and clarify why are there no cumulative scenarios that take into consideration other known/expected projects in the area.
 - For the statement made that there are multiple dismissal times to justify a reduced number of pickups and drop offs, please verify if the studies used to develop the recommended drop of lane lengths had a single concentrated single dismissal time.
 - Please provide more details for the sidewalk area between the drop off area and Angus Avenue road. How wide would the area be? Will the area be wide enough to accommodate loading activities occurring on both sides?
 - A separate parking occupancy study was performed in this area as part of a different project. Some of the estimates for capacity vary greatly from the estimates in the other side. Please provide a more detailed breakdown of the calculation of the parking capacity.
 - In the submitted traffic report executive summary section, please cite the sources for the following statements:
 - ❖ All study intersections are at good LOS;
 - ❖ There were 18 reported collision so that there is no particular traffic problems;
 - ❖ There are 245 cars parked on the street.

- Revised the proposed drop off zone as the current configuration is too narrow and needs to accommodate at least two lanes. Also, clarify if there will be a drop-off area in the staff parking or not as there is one shown on the plan.

Hydrology and Water Quality -

- The referenced State Water Resources Control Board Order No. R2 2009-0074 reference is outdated. The updated one is Municipal Regional Stormwater Permit, Order No. R2-2015-0049, as amended by Order No. R2-2019-0004. Please revise.

Utilities and Service Systems -

- The City has six (6) sewer lift stations. Please revise to reflect correct number.
- A hydraulic model for the sewer and water systems will be required to determine the impacts of the new school on the existing utility systems and to confirm adequate capacity.

Mandatory Findings of Significance-

- Revise reference to the major development project, Mills Park Center, as an “SB 35” proposal. Please note that the City has yet to receive a formal SB35 project proposal for the Mills Park Development and that there was a resubmittal provided to City for review in March that is not considered a SB35 project. Please update and make necessary changes to this section to reflect this information.
- Revise the statement that the project would not contribute to any impacts on the Mills Park Center project. The two projects are in very close proximity and could potentially require higher level of coordination. There may be overlap of utilities serving both sites. Please reevaluate potential impacts of improvements from the Mills Park Center project within the Public Right of Way to this project and update this section.

Thank you again for the opportunity to review and provide comments in response to the Notice of Preparation (NOP) of a Draft Environmental Impact Report for the Decima Allen Elementary School Replacement Project. The City remains highly interested in the project. Therefore, the City respectfully requests the San Bruno Park School District to continue coordinating and consulting with City staff.

Should you have any further questions or clarification, I can be reached at (650) 616-7053.

Sincerely,

Pamela T. Wu, AICP
Planning and Housing Manager

Cc:
Darcy Smith, Community and Economic Development Director
Jimmy Tan, Public Works Director
Hae Won Ritchie, City Engineer

City of San Bruno LOS Significance Thresholds

General Plan Policy Basis:

Two policies in the San Bruno General Plan address level of service in the City of San Bruno.

1. San Bruno General Plan Policy T-6 and Figure 4-2 identify 28 intersections at which the LOS Standard is D during the AM and PM peak periods.
2. San Bruno General Plan Policy T-B requires that an acceptable LOS be maintained on the City's street network.

Level of Service Standard:

The minimum acceptable Level of Service in the City of San Bruno is LOS D.

Traffic Impact Significance Threshold:

When evaluating development projects to determine if a significant traffic impact will occur the following significance thresholds shall be applied.

Signalized Intersections. A significant traffic impact occurs if for a peak hour:

1. The level of service falls from LOS D or better under existing conditions to LOS E or F under existing plus project conditions; or
2. The level of service is LOS E or F under existing conditions, and the addition of project trips would cause the critical-movement delay at the intersection to increase by four or more seconds; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Unsignalized Intersection. A significant traffic impact occurs if for a peak hour:

1. The intersection of a stop-controlled approach falls from LOS D or better under existing conditions to LOS E or F; or
2. The level of service is E or F under existing conditions; and the project would add ten or more vehicle trips to the critical movement of the intersection or stop-controlled approach during the peak hour; and the intersection meets the California Manual on Uniform Traffic Control Devices (CAMUTCD) peak hour volume traffic signal warrant during the peak hour; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Traffic Improvements

Improvements to address significant traffic impacts that occur as a result of existing plus project conditions are expected to be implemented at the time of occupancy. Depending on the situation, the applicant may be required to pay as much as the full cost of the improvements. Improvements to address significant traffic impacts associated with cumulative plus project conditions are not required until a later date. The applicant may be required to pay for their fair share of the cost of the improvement.

For insertion into project planning documents:

Two policies in the San Bruno General Plan address level of service in the City of San Bruno. General Plan Policy T-6 and Figure 4-2 identify 28 intersections at which the LOS Standard is D during the AM and PM peak periods. General Plan Policy T-B requires that an acceptable LOS be maintained on the City's street network. The minimum acceptable Level of Service in the City of San Bruno is LOS D.

When evaluating development projects to determine if a significant traffic impact will occur the following significance thresholds shall be applied.

Signalized Intersections. A significant traffic impact occurs if for a peak hour:

1. The level of service falls from LOS D or better under existing conditions to LOS E or F under existing plus project conditions; or
2. The level of service is LOS E or F under existing conditions, and the addition of project trips would cause the critical-movement delay at the intersection to increase by four or more seconds; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Unsignalized Intersection. A significant traffic impact occurs if for a peak hour:

1. The intersection or a stop-controlled approach falls from LOS D or better under existing conditions to LOS E or F under existing plus project conditions; or
2. The level of service is E or F under existing conditions; and the project would add ten or more vehicle trips to the critical movement of the intersection or stop-controlled approach during the peak hour; and the intersection meets the California Manual on Uniform Traffic Control Devices (CAMUTCD) peak hour volume traffic signal warrant during the peak hour; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

B. Initial Study

INITIAL STUDY FOR THE PROPOSED DECIMA ALLEN ELEMENTARY SCHOOL REPLACEMENT PROJECT



Prepared for:

San Bruno Park School District
500 Acacia Ave
San Bruno, CA
94066

Prepared by:

Grassetti Environmental Consulting
7008 Bristol Drive
Berkeley, CA
94705

December 2020

-

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ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
BAAQMD	Bay Area Air Quality Management District
BMP	Best Management Practice
CARB	California Air Resources Board
FEMA	Federal Emergency Management Agency
HPD	Historic Property Directory
CO	carbon monoxide
CO ₂ E	carbon dioxide equivalent
GHG	greenhouse gas
gpd	gallons of wastewater per day
LOS	level of service
mgd	million gallons per day
MLD	Most Likely Descendant
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
OHP	State Office of Historic Preservation
O ₃	ozone
PM ₁₀	particulate matter less than 10 microns
PM _{2.5}	particulate matter less than 2.5 microns
SCH	State Clearinghouse
SFBAAB	San Francisco Bay Area Air Basin
SFBRWQCB	San Francisco Bay Regional Water Quality
Control Board SLF	Sacred Lands File
SO _x	sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TMDL	Total Maximum Daily Load
VOC	volatile organic compound
WWTP	Wastewater Treatment Plant

ENVIRONMENTAL DETERMINATION

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

X	Aesthetics		Greenhouse Gas Emissions		Public Services
	Agricultural and Forestry Resources		Hazards and Hazardous Materials		Recreation
X	Air Quality	X	Hydrology/Water Quality	X	Transportation/ Traffic
X	Biological Resources		Land Use/Planning		Tribal Cultural Resources
X	Cultural Resources		Mineral Resources		Utilities/Service Systems
	Energy	X	Noise		Wildfire Hazards
X	Geology/Soils		Population/Housing	X	Mandatory Findings of Significance

DETERMINATION: On the basis of this initial evaluation:

I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	X
I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.	

Mariana Solomon, Associate Superintendent

Date

-

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I. INTRODUCTION

This Initial Study (IS) has been prepared by the San Bruno Park School District, pursuant to the California Environmental Quality Act (Public Resources Code Sections 21000 et seq.), CEQA Guidelines (Title 14, Section 15000 et seq. of the California Code of Regulations). It provides documentation to support the conclusion that the proposed school replacement project (“the Project”), with mitigation identified herein, would not cause a potentially significant impact to the physical environment of any resource other than Historic Resources. The proposed project is located on the existing Decima Allen Elementary School campus, in San Bruno.

This IS describes the location of the Project site, the Project sponsor’s objectives, and the details of the proposed Project. The Environmental Checklist Form included as Appendix G of the CEQA Guidelines serves as the basis for the environmental evaluation contained in the IS. The Checklist Form examines the specific potential Project-level physical environmental impacts that may result from the construction and operation of the proposed new and expanded facilities onsite. Mitigation measures have been identified to reduce potentially significant impacts that would otherwise occur with development and operation of the new facilities to a less-than-significant level.

The District will serve as the “lead agency” (the public agency that has the principal responsibility for carrying out and/or approving a Project) for the proposed Project. The governing board of the District is responsible for ensuring that the environmental review and documentation meet the requirements of CEQA. The draft IS is subject to review and comment by responsible agencies and the public during a statutory public review period of the EIR (45 days). Any necessary revisions will be incorporated in the Final IS/ in the EIR.

Organization of the Initial Study

This document is organized into the following sections:

SECTION I – INTRODUCTION: Provides background information about the Project name, location, sponsor, and the date this Initial Study was completed.

SECTION II – PROJECT DESCRIPTION: Includes a Project background and detailed description of the proposed Project.

SECTION III – INITIAL STUDY CHECKLIST AND DISCUSSION: Reviews the proposed Project and states whether the Project would have potentially significant environmental effects.

SECTION IV – MANDATORY FINDINGS OF SIGNIFICANCE: States whether environmental effects associated with development of the proposed Project are significant, and what, if any, added environmental documentation may be required.

SECTION V – REFERENCES: Identifies source materials that have been consulted in the preparation of the IS.

SECTION VI – REPORT PREPARERS: Identifies the firms and individuals who prepared the IS.

I. PROJECT DESCRIPTION

Project Name:	Allen Elementary School Replacement Project
Project Location:	875 Angus Ave W. San Bruno, CA 94066
Project Applicant and Lead Agency Contact:	Mariana Solomon Associate Superintendent San Bruno Park School District 500 Acacia Ave. San Bruno, CA 94066 msolomon@spbsd.k12.ca.us
General Plan Designation:	City of San Bruno, Low Density Residential
Zoning:	City of San Bruno, Single Family Residential (R-1)
Project Approvals:	San Bruno Park School District (SBPSD) approval of new campus buildings and site plans. Review of facilities by Division of the State Architect for structural safety, fire and life safety, and ADA accessibility. Possible City of San Bruno approval of Grading Permit.
Date Initial Study Completed:	June 2020

PROJECT DESCRIPTION

Project Purpose and Need

Many of the existing school buildings are over 60 years old and need a full modernization. Additionally, the existing site topography would make it almost impossible to meet ADA requirements. Given these combined deficiencies, the District is proposing to replace the existing buildings with new ones and recontour the site to allow ADA compliance.

Project Location and Surrounding Land Uses

Decima Allen Elementary School is located at 875 Angus Avenue West in the central area of the City of San Bruno, in San Mateo County (See Figure 1). Regionally, the campus is accessed via from US Highway 101, via San Bruno Avenue, and US Highway 380, via El Camino Real. The Millbrae BART Station is located approximately 2.5 miles south of the school.

As shown on Figure 2, the Allen School campus is surrounded by Angus Avenue West on the north, Elm Avenue on the west, Linden Avenue on the east, and single-family residences to the south. The City of San Bruno library, City Hall, and a fire station are directly across Linden Avenue from the school. Single family residential neighborhoods are across the street from the school to the west and north. The El Camino Real commercial strip is one block west of the school.

The Allen School occupies about 5.3 acres. The history of Allen School can be traced back to 1910 with the foundation of Edgemont School. Old Edgemont School opened in 1910 on the site of the current district offices. New Edgemont School (now the main campus) at Angus and Elm Avenues opened in 1941 with nine classrooms. Six more classrooms were added in 1946. The offices, cafeteria and kindergarten (now the Media Center) were added in 1956 when the school was renamed in honor of Decima M. Allen, San Bruno's librarian from 1937 to 1955 as well as a 25-year member of the school board and president of the Edgemont PTA.

Existing School Facilities

Existing school facilities include 14 standard classrooms, one special education classroom, a library, an administration building, and a multi-use room. The school campus also includes paved playfields and basketball courts, and a grass-turfed baseball field. The existing school has a capacity of about 400 students. Existing and proposed school facilities are summarized on Table 1.

IS for the Proposed Decima Allen Elementary School Replacement Project

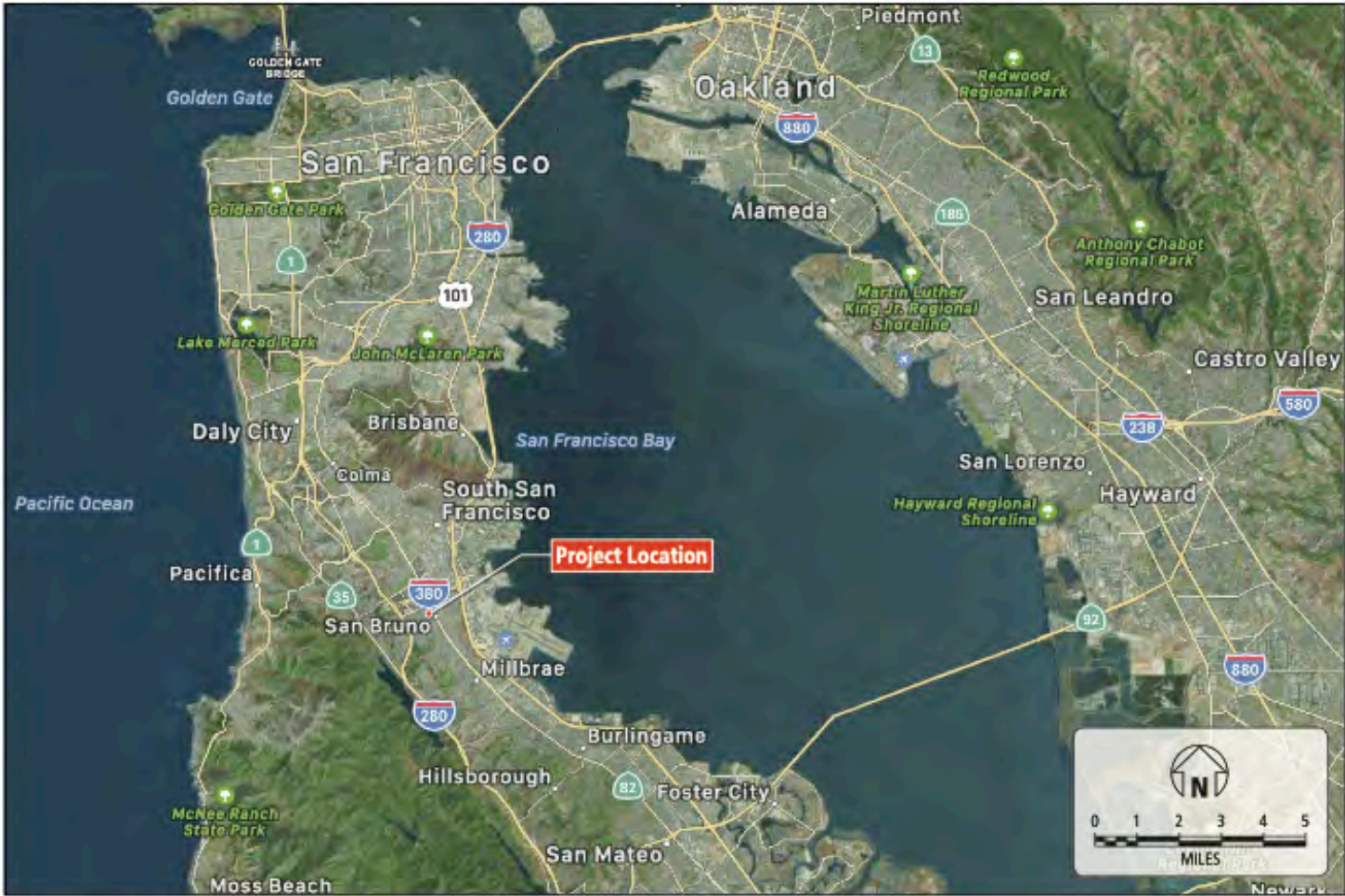


Figure 1
Project Location

Source: TomTom Maps

IS for the Proposed Decima Allen Elementary School Replacement Project



Figure 2
Aerial Photograph of Existing Campus and Project Site

Source: TomTom Maps

Table 1: Existing and Proposed School Facilities

Building	Current	SF	Proposed	SF
Standard Classrooms	14	12,389	15	13,729
Specialty Classrooms	0	0	2	2,367
Special Education				
Classrooms	1	930	1	983
Library	1	2204	1	2716
Administration	1	1385	1	3196
Multi-Use Room / Food				
Service	1	4490	1	8435
Operational Support	LS	4498	LS	10,668
Circulation	LS	2776	LS	10,770
		28,672		52,864

Proposed Replacement School

Overview

The SBPSD proposes to construct most of the replacement school buildings on the playfield areas of the existing school. Once those facilities are completed, students would move to the new school buildings and the existing buildings would be demolished and removed, and new play areas constructed. Phase 1, which includes grading of the existing playfield areas and construction of all of the new buildings except the library and kindergarten building, would occur from May 31, 2021 through July 29, 2022. Phase 2, which includes demolition and removal of the existing buildings, grading of the remaining site areas, and construction of the library, kindergarten building, and new play areas, is proposed for June 6, 2022 through December 30, 2022.

Proposed Facilities and Operations

The proposed project includes construction of five new buildings on the eastern and southern parts of the site, where the existing playfields are located. The site would be benched with upper and lower benches. Landscaped areas include a new amphitheater, outdoor classroom area, lunch area with picnic tables, two new play areas, and a new play field. A new parking area with 33 spaces would be provided, to be accessed from Linden Avenue. The proposed project is summarized in Table 1, above, and shown on the site plan in Figure 3, below.

IS for the Proposed Decima Allen Elementary School Replacement Project

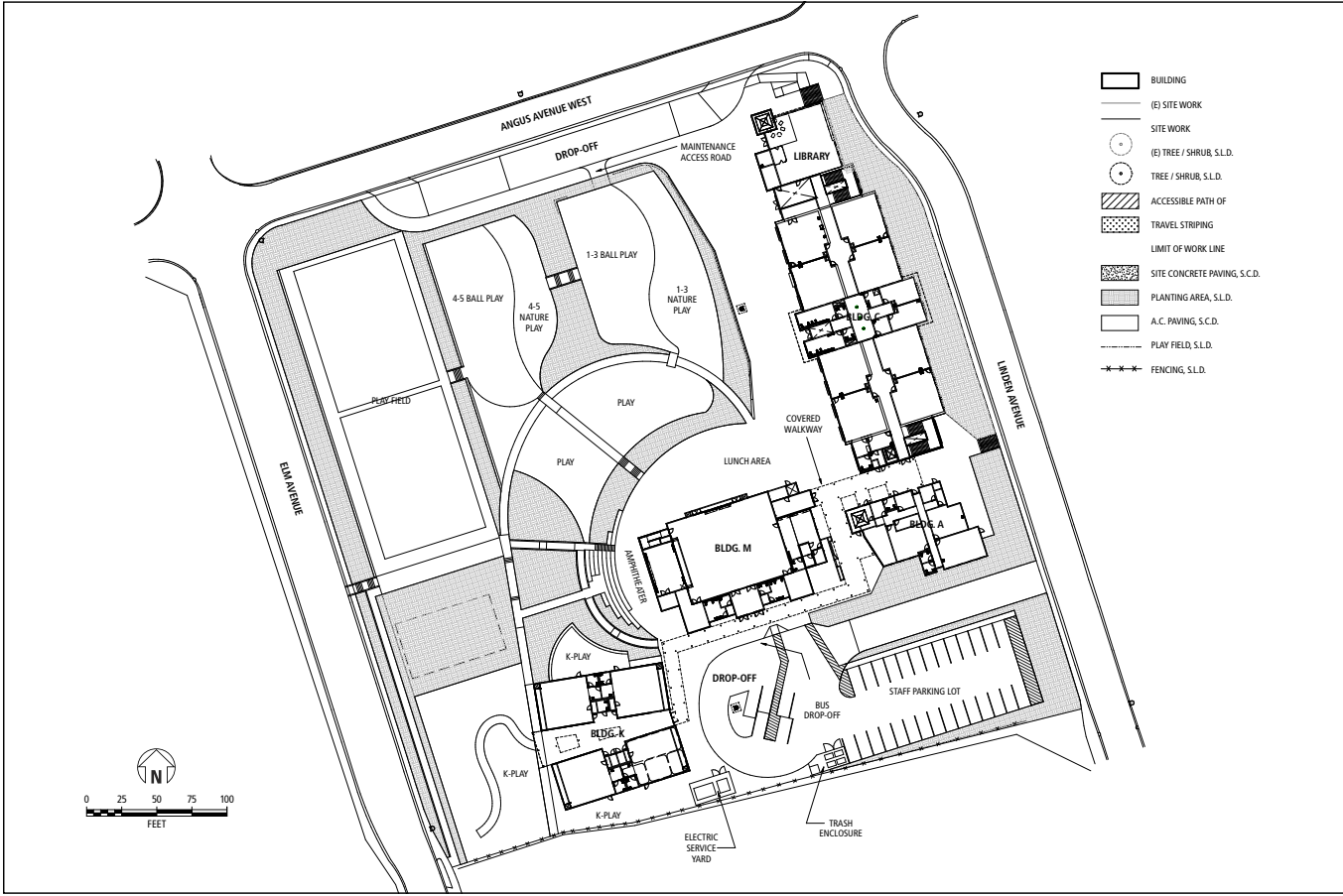


Figure 3
Project Site

Source: Hibser Yamauchi Architects, Inc.

The new school buildings would be one- and two-stories and of modern design. The maximum building heights would be approximately 31 feet above grade. Buildings would be constructed on the site, with staging occurring within the construction site.

Grading and foundation work would occur during the summer, with construction of the buildings continuing for about a year. The construction site would be securely fenced so that access by children at the school would not be prohibited. A portion of the existing blacktop available as well as the courtyard spaces between wings will be available for children play areas in the interim period.

The child drop-off area would remain on Angus Street; an internal drop off driveway would be provided, eliminating the need for on-street drop offs. The number of parking spaces to be provided would be slightly greater than existing (33 spaces compared to the existing 30 spaces).

Capacity would be increased from about 400 students to about 500 students. The current enrollment is 337 elementary school students at the Allen School campus and 72 kindergarten students at the Hesselgren Primary School at 525 Elm Street. No increase in elementary school enrollment is anticipated, however the Hesselgren students would be relocated to the new Allen school, and a pre-school with approximately 15 students per period (morning and afternoon periods) is proposed for the site. School hours would remain at 8:25 – 2:45 for the elementary school students and would be 8:20-12:30 for the preschool.

Lighting. Perimeter lighting and lighting outside of the new school buildings would be provided, in addition to parking lot lighting. No play field lighting is proposed.

Grading. Approximately 30,000 cubic yards of material would be graded on the site to provide level areas for the new buildings and play areas. Approximately 21,300 cu. yds. would be cut and about 9200 cu. yds. will be fill. Approximately 12,000 cubic yards of material would be hauled off of the site, and the remainder would be balanced on the site. Substantial topographic changes would occur on the site- it would be benched into upper playfield areas and lower school building areas, with ramps connecting the two levels. In total, four benches would be created, with about five feet of elevation difference between each bench.

Tree Planting and Removal. There are 57 trees on the project site and two groves of trees overhand the property from adjacent properties. At least thirty-three trees would be removed as a result of the project, most of which are on the west, south and east perimeters of the site. It is possible that nearly all of the site's trees may be removed, depending on the final grading plan. Removed trees would be replaced at least a 1:1 ratio, with the goal of a 2:1 replacement ratio. A tree removal and replacement plan would be prepared as part of final project design. Trees are discussed in detail in the Aesthetics section of the IS.

Landscape and Hardscape. The project would, when completed, increase landscaped areas on

the campus compared to existing conditions. It would therefore reduce impervious surface area on the site from about 48,780 sq. ft. to about 44,192 sq. ft.

Drainage and Water Quality. The site would continue to drain into the City's existing storm drain system on Linden Avenue. A construction stormwater program would be implemented during demolition and construction activities to assure that demolition materials and site soils do not enter the City's stormwater system. That stormwater drainage program would be reviewed by the City Public Works Department prior to implementation; the Construction Stormwater Pollution Prevention Plan would be reviewed by the Regional Water Quality Control Board.

Construction Equipment, Workers, and Hours

Construction. Construction activities would include grading, then construction of foundations, infrastructure, buildings, and landscaping. Construction would on M-F 7:00-4:30 with some Saturdays 9:00-4:30 possible. The future parking lot would be used as the construction laydown area. Construction would occur in the following phases:

- 1) Grading/Site Prep (5/31/21- 8/27/21)
- 2) Construction of New School except library (6/28/21-7/15/22)
- 3) Demolition of Old School (6/6/22- 7/29/22)
- 4) Construction of new library/fields/play areas (6/27/22-12/16/22)

Demolition. As summarized above, demolition would occur over a 2-month period in the summer of 2022. The first phase would be abatement: all lead-based paints, asbestos-containing materials, PCB-containing equipment, and any other potentially hazardous materials would be removed by specialized workers certified for such removal. Removed materials would be placed into covered dumpsters for removal to appropriate disposal facilities. After abatement is complete, the buildings would be demolished and the debris hauled off for recycling or landfilling. Approximately 125 truckloads of material (about 25,000 cubic yards) are expected to be removed, with 3 to 4 high-sided trucks cycling through the site, with loading occurring via a front-loader. Demolition activities typically would occur between 7 am and 3:30 pm, during the summer break.

Equipment Use. Equipment used during demolition and construction would vary by phase, but would include excavators, bulldozers, backhoes, dump trucks, haul trucks, graders, compactors, water trucks, and similar equipment.

Construction Workers. There would be up to 24 construction workers onsite on an average day.

Land Use Entitlements and Other Agency Approvals

SBPSD Approvals. The School District is a local agency with independent discretionary authority over site improvements. The District would take approval actions for the Project at a noticed

SBPSD Board of Trustees Meeting.

Other Agency Approvals. The Project would require the following approvals from other agencies:

- City of San Bruno Grading Permit;
- Regional Water Quality Control Board, San Francisco Bay Region, Construction Stormwater Pollution Prevention Plan and Permit;
- Bay Area Air Quality Management District, Approval Letter for asbestos demolition; and
- Division of the State Architect review of construction plans.

II. INITIAL STUDY CHECKLIST

The initial study checklist recommended by the CEQA Guidelines is used to describe the potential impacts of the proposed Project on the physical environment.

I. Aesthetics

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?		X		
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?			X	

Discussion

- a, b) The project site slopes to the east and north. It is located in an urbanized area characterized by houses, city buildings, and commercial uses. The site is visible from adjacent roadways and residences, as well as from the rear of the City of San Bruno library, the Linden Ave. entrance to City Hall, and the fire station. As shown on Figures 4 to 9, below, views of the site are characterized by single-story school buildings and paved play and parking



Figure 4: View of the school looking east along Angus near Elm Street



Figure 5: View of the school parking lot and classrooms from Elm Street.



Figure 6: View east from the school looking at City of San Bruno Library



Figure 7: View of eastern school yard looking south along Linden Ave.



Figure 8: View looking west across the site from Linden Ave.



Figure 9: View of the school looking northwest from Linden Ave.

areas. Distant views of the hills to the north and west are also available from the project area. There are no view corridors to unique or large-scale natural or dramatic scenic features within the project viewshed.

The proposed replacement buildings, parking lot, and play areas would not affect views from or to nearby hillsides or ridgelines. Views of the proposed buildings would be available from the existing houses to the west, south, and north. Existing views of buildings from residences Angus and Elm would be replaced by views of landscaped play areas and the new drop-off lanes.

In the short term, for the approximately one year between to removal of the existing school buildings, the site would appear substantially more densely developed than at present. None of these changes would substantially alter existing views, block any views, or substantially alter any scenic resource.

Views from houses immediately to the south of the school would include replacement building and the parking lot. The dense row of trees and shrubs that visually buffer those houses from views of the school facilities would be removed by the project and replaced with small trees that would eventually grow to re-create the existing visual buffer. In the interim, the existing solid fence at the site's southern edge would continue to partially limit views of the school and the new parking lot on that side of the school. The change in views of the school from those houses would be substantial, but not necessarily significantly adverse in the urban context.

An arborists report has been prepared to address potential tree loss resulting from the project (Aesculus Arboricultural Consulting, May 11, 2020). That report identified 57 trees on the site and two groves of trees on adjacent properties that overhang the site. San Bruno Park School District's Board Policy 3510 designates three native species of trees as protected: coastal live oak, coast redwood and coastal bay laurel, and requires an arborist assessment. for trees of those species that are over 10-inches in diameter. There are 10 live oaks and 3 redwoods on the site. There are no bay laurels on the site. The Policy requires proof of disease or risk to life or limb for removal at existing schools. The Policy also has a provision for District construction and remodeling projects requiring that, "an effort must be made to plant native trees first for either replacement trees or new decorative landscape trees".

Eight of the live oaks would be removed. All of these have trunk widths of less than 10 inches in diameter, so are not protected under the Board Policy. Four of the live oaks along Elm Ave. should be able to be preserved, including two

large oaks protected under the District Policy. All three redwoods are larger than 10-inches in diameter, and therefore protected under District Policy. Two redwoods close to the Kindergarten Building and would be removed. Their trunks would be salvaged and incorporated into the children's play area. One redwood is on the neighbor's property and would remain. In total, the project would potentially remove as few as three "District Protected" trees. All three are reported in "good" health and the redwoods are substantial in size.

Overall, the views of the new school facilities would, upon project build-out, be similar to the existing views, but with more modern buildings and landscaped areas replacing paved areas and smaller trees replacing the larger trees within the campus and along the site perimeter. Mitigation Measure AES-1, below is intended to assure that this impact would be less than significant.

There are no rock outcroppings, historic buildings, or scenic highways on or immediately adjacent to the project site. There are also no designated scenic highways with views of the site. Therefore, the Project would have a **less-than-significant** on scenic vistas or scenic resources.

- c) As shown in Figures 4 to 9, above, the Project site is within an urbanized area. Although the site is not under City of San Bruno planning jurisdiction, plan compliance can be used as an indicator of impact significance. The project would not conflict with any City of San Bruno ordinances or policies governing scenic quality. Since there would be no conflicts, the project would have **no impact** on visual-quality-related plans or policies.
- d) The Project would include security lighting for the proposed new buildings however, this lighting would be directed and shielded, would not be substantially brighter or more visible than existing lighting, and would not be expected to generate significant sources of light visible to residents west, south, and north of the site. There would also be lighting associated with the parking lot. That lighting would be designed, shielded, and aimed northward, away from adjacent homes. Therefore, light and glare impacts would be **less than significant**.

Mitigation Measure

Mitigation Measure AES-1: A tree replacement plan shall be developed in consultation with the City's Arborist and implemented by the District. The proposed plan would include replacement of District-protected trees with large specimen trees. (24" or 36" box). A minimum 1 to 1 replacement

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shall occur, with 2 to 1 replacement if determined to be feasible by the Project landscape architect. To the extent feasible, mature native trees at the perimeter of the site (identified in the project's arborist report) shall be preserved.

II. Agricultural and Forestry Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X

Discussion

- a-e) The project site is on an existing school campus in a heavily urbanized area, and contains no Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Williamson Act contracted lands, active agricultural operations, or forest. Therefore the project would not result in the conversion of farmland or forestland to non-agricultural uses. For these reasons, there would be **no impact** on agricultural or forest resources.

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:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
b) Result in a cumulatively considerable net increase of any criteria for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?		X		
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

Background

The Project site (i.e., the Allen Elementary School campus) is located in the Bay Area's "Peninsula" climatic sub-region, which includes all of San Mateo County. In the summer and fall, episodes of high temperatures and low wind speeds in the County increase the potential for local ozone formation and build up. During the winter, surface-based temperature inversions (i.e., colder air near the ground, capped by warmer air aloft, which limits the vertical dispersion of air pollutants) concentrate pollutants such as carbon monoxide and particulate matter generated by motor vehicles, fireplaces/ woodstoves, etc. Many other chemical compounds, generally termed toxic air contaminants (TACs), pose a present or potential hazard to human health through airborne exposure from a wide variety of TAC sources, both stationary (e.g., dry cleaning facilities, gasoline stations, and emergency diesel-

powered generators) and mobile (e.g., motor vehicles, construction equipment).

Ozone and suspended particulate matter (i.e., two types of the latter - particulate matter less than ten microns in diameter [PM_{10}] and particulate matter less than 2.5 microns in diameter [$PM_{2.5}$]) are of particular concern in the Bay Area, which is currently designated “nonattainment” for state and national ozone ambient air quality standards, for the state PM_{10} standards, and for state and national $PM_{2.5}$ standards; it is “attainment” or “unclassified” with respect to all the other major air pollutants. The BAAQMD maintains a number of air quality monitoring stations, which continually measure the ambient concentrations of major air pollutants throughout the Bay Area. The closest station to the Project site is at 897 Barron Avenue in Redwood City, about 15 miles southeast of the Project site. The data collected show violations of the ozone and $PM_{2.5}$ particulate standards on a few days per year over the last three years, see Table AQ-1.

Table AQ-1: Local Ambient Air Quality Monitoring Summary

Pollutant	Air Quality Standard	Maximum Concentrations and Number of Days Standards Exceeded		
		2016	2017	2018
Ozone				
Maximum 8-hour concentration (ppb)		60	8 6	4 9
# Days 8-hour national/California standard exceeded	70 ppb	0	2	0
Nitrogen Dioxide (NO ₂)				
Maximum 1-hour concentration (ppb)		46	6 7	7 7
# Days national 1-hour standard exceeded	100 ppb	0	0	0
Suspended Fine Particulates (PM _{2.5})				
Maximum 24-hour concentration (µg/m ³)		19.5	60.8	120.9
# Days national 24-hour standard exceeded	35 µg/m ³	0	6	13*

Notes:

The pollutants are monitored at the BAAQMD station at 897 Barron Avenue in Redwood City (about 15 miles southeast of the Project site).

$\mu g/m^3$ = micrograms per cubic meter

ppb = parts per billion.

* The number of days exceeding the $PM_{2.5}$ standard in 2018 was unusually high due to the influence of the Camp Fire on Bay Area air quality.

Source: BAAQMD Air Quality Summary Reports <http://www.baaqmd.gov/about-air-quality/air-quality-summaries>

The Highway 101 corridor in San Mateo County contains a dense concentration of stationary industrial/commercial air pollution sources and is crossed by several major freeways and State highways, but stationary sources become relatively sparse in suburban areas west of El Camino Real and mountainous areas beyond. The only notable stationary sources near the Project site are gas stations (one at the San Bruno fire station at 555 El Camino Real and San Bruno Chevron at 512 El Camino Real) and a commercial facility (GW Williams Co. at 709 Camino Plaza). El Camino Real (State Route 82), a major source of airborne toxics from motor vehicles, passes about 300 feet east of the Project site.¹

Analysis Methodology and Significance Criteria

The air quality analysis addressing this Initial Study checklist items was performed using the methodologies and significance thresholds recommended in *CEQA Air Quality Guidelines* (*Guidelines*; BAAQMD, May 2017, Table 2-1). The air pollutant impacts evaluated in the Items “a” and “b” discussions below are from precursors to ozone formation (i.e., reactive organic compounds [ROG] and nitrogen oxides [NO_x]) and small-diameter particulate matter (i.e., PM₁₀ and PM_{2.5}). According to the *Guidelines*, any Project would have a significant potential for obstructing air quality plan implementation or making a cumulatively considerable contribution to a regional air quality problem if its pollutant emissions would exceed any of the thresholds presented in Table AQ-2 during construction or operation.

In addition to the major air pollutants (as identified above), many other chemical compounds, generally termed toxic air contaminants (TACs), pose a present or potential hazard to human health through airborne exposure. A wide variety of sources, stationary (e.g., dry cleaning facilities, gasoline stations, and emergency diesel-powered generators, etc.) and mobile (e.g., motor vehicles, construction equipment, etc.), emit TACs. The health effects associated with TACs are quite diverse. TACs can cause adverse health effects from long-term exposure (e.g., cancer, birth defects, neurological damage, asthma, bronchitis, or genetic damage) and/or from short-term exposure (e.g. eye watering, respiratory irritation, running nose, throat pain, and headaches). Most of the estimated carcinogenic/chronic health risk in California can be attributed to relatively few airborne compounds, the most important being particulate matter from diesel-fueled engines (DPM). The California Air Resources Board (CARB) has identified DPM as being responsible for about 70 percent of the cumulative cancer risk from all airborne TAC exposures in California.

¹ The BAAQMD Stationary Source Screening Analysis Tool and Highway Screening Analysis Tool allow all major Bay Area stationary and freeway/highway TAC sources to be located on Google Earth maps and their health risks displayed. <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>

TABLE AQ-2: CEQA Air Quality Significance Thresholds for Air Pollutant Emissions

Pollutant	Construction Average Daily (lbs./day)	Operational	
		Average Daily (lbs./day)	Maximum Annual (tons/year)
Reactive Organic Gases (ROG)	54	54	10
Oxides of Nitrogen (NO _x)	54	54	10
Inhalable Particulate Matter (PM ₁₀)	82 (exhaust)	82	15
Fine Inhalable Particulate Matter (PM _{2.5})	54 (exhaust)	54	10
PM ₁₀ /PM _{2.5} (Fugitive Dust)	BMPs ^a	N/A	N/A
Notes: BMPs = Best Management Practices N/A = Not Applicable ^a If BAAQMD Best Management Practices (BMPs) for fugitive dust control are implemented during construction, the impacts of such residual emissions are considered to be less than significant. Source: Bay Area Air Quality Management District, May 2017, <i>CEQA Air Quality Guidelines</i> .			

The *Guidelines* establish a relevant zone of influence for an assessment of project-level and cumulative health risk from TAC exposure to an area within 1,000 feet of a project site. Project construction-related or Project operational TAC impacts to sensitive receptors within the zone that exceed any of the following thresholds are considered significant:

- An excess cancer risk level of more than 10 in one million
- A non-cancer hazard index greater than 1.0.
- An incremental increase of greater than 0.3 micrograms per cubic meter (µg/m³) for annual average PM_{2.5} concentrations.

Cumulative impacts from TACs emitted from freeways, state highways or high-volume roadways (i.e., the latter defined as having traffic volumes of 10,000 vehicles or more per day or 1,000 trucks per day), and from all BAAQMD-permitted stationary sources within the zone to sensitive receptors within the zone that exceed any of the following thresholds are considered cumulatively significant:

- A combined excess cancer risk level of more than 100 in one million.
- A combined non-cancer hazard index greater than 10.0.
- A combined incremental increase in annual average PM_{2.5} concentrations greater than 0.8 µg/m³.

Project and cumulative TAC impacts are evaluated in the Item “c” discussion below.

Discussion

- a) The BAAQMD's current *Clean Air Plan: Spare the Air, Cool the Climate* (2017 Plan), focuses on two closely-related goals: protecting public health from air pollutant exposures and reducing Bay Area emissions of heat-trapping gases (termed greenhouse gases [GHG]) that promote global climate change (Project GHG impacts will be addressed in Section VIII below).

Key elements in the 2017 Plan control strategies having particular applicability to the Project, are:

Controls on Transportation Sources:

- Direct new development to areas that are well-served by transit, and conducive to bicycling and walking.

Controls on Buildings and Energy Sources:

- Expand the production of low-carbon, renewable energy by promoting on-site technologies such as rooftop solar, wind and ground-source heat pumps.
- Promote energy and water efficiency in both new and existing buildings.
- Promote the switch from natural gas to electricity for space and water heating in Bay Area buildings.

The Project site is served by the San Mateo County Transit District (SamTrans) bus lines #141 and “ECR” that connect it to other Peninsula communities.

The Project would renovate and expand existing elementary school, kindergarten, and day care facilities on a site that has contained similar educational facilities serving the San Bruno School District for over 100 years. Although the new facilities would support a student/pre-school enrollment about 25% greater than the existing facilities, it would not have the potential to substantially affect regional housing, employment, and/or population levels in San Mateo County or the Bay Area, which are the bases of the 2017 Plan regional emission inventories and control strategies. Project construction will comply with the CALGreen (Title 24), the statewide building energy code, a control strategy promoted by the 2017 Plan.

Compliance with BAAQMD-approved CEQA thresholds of significance is

another condition for determining Project consistency with 2017 Plan control measures. Thus, the Project would have **less than significant** air quality impacts because it meets all BAAQMD CEQA emission thresholds (as addressed in the Items b discussion below).

- b) The BAAQMD *Guidelines* recommend quantification of Project construction and operational emissions and their comparison to the CEQA significance thresholds. For this project, the California Emissions Estimator Model (CalEEMod, Version 2016.3.2) was used. CalEEMod was run using the model's "elementary school" source category to estimate emissions from the existing on-site elementary school and from the proposed school designed to replace it (as both described in the Project Description). The Project's net new emissions for each pollutant in all source categories were calculated from the differences. The model was initialized to reflect the sizes (i.e., square feet of floor area) of the existing and proposed schools, with input assumptions adjusted to reflect the project-specific construction schedule, daily truck trips for grading material and demolition debris off-haul, and operational motor vehicle daily trips (the latter two data items as specified in the Project transportation study).

Table AQ-3 shows the estimated exhaust air-pollutant emissions for all Project phases from construction equipment, haul/delivery trucks and worker commute vehicles. Tables AQ-4 and AQ-5 show the operational air-pollutant emissions from all Project stationary and mobile sources in the first year of operation (assumed to be 2023). All tables include comparisons with the BAAQMD CEQA significance thresholds. As can be seen, this impact would be **less than significant**, and no mitigation is required.

- c) The Project site is in a residential area of San Bruno south of San Bruno Avenue and west of El Camino Real. Existing single-family residences face the site from across the streets on the north, west and south sides, with City civic uses (i.e., library, City Hall, Fire Department) to the east across Linden Avenue and predominantly commercial uses along El Camino Real a few hundred feet farther east. The local maximally exposed sensitive receptors [MESR] to Project construction emissions and to existing emissions from cumulative local TAC sources would be the residential uses along Angus and Linden Avenues closest to El Camino Real.

**Table AQ-3: Project Construction Pollutant Emissions
(Maximum Pounds per Day)**

Phase (Year)	ROG	NO _x	PM ₁₀	PM _{2.5}
	lbs./day			
New School Construction				
Site Preparation (2021)	1.58	17.43	0.77	0.70
Grading (2021)	1.52	21.83	0.66	0.61
Building Construction (2021-2022)	1.91	14.61	0.69	0.66
Paving (2022)	0.72	6.80	0.35	0.32
Architectural Coating (2022)	14.52	1.42	0.08	0.08
Old School Demolition				
Demolition (2022)	1.15	20.05	0.38	0.36
Site Preparation (2022)	0.59	6.94	0.26	0.24
Grading (2022)	0.74	6.43	0.34	0.32
Play Fields Construction (2022)	0.70	5.95	0.30	0.28
Highest Daily of All Phases	14.52	21.83	0.77	0.70
Significance Thresholds	54	54	82	54
Significant Impact?	No	No	No	No

**Table AQ-4: Project Operational Pollutant Emissions - Year 2023
(pounds per day)**

Emission Source Category	ROG	NO _x	PM ₁₀	PM _{2.5}
Allen Elementary School – Existing Configuration (410 students, 28,672 sq. ft.)				
Area	0.70	0.00	0.00	0.00
Energy	0.01	0.13	0.01	0.01
Mobile	0.70	1.81	2.50	0.68
Existing Total	1.41	1.93	2.51	0.69
Allen Elementary School – Project Configuration (520 students, 55,514 sq. ft.)				
Area	1.35	0.00	0.00	0.00
Energy	0.03	0.25	0.02	0.02
Mobile	0.88	2.29	3.16	0.86
Project Total	2.25	2.53	3.18	0.88
Allen Elementary School – Net New Emissions				
Area	0.65	0.00	0.00	0.00
Energy	0.01	0.12	0.01	0.01
Mobile	0.18	0.48	0.66	0.18
Net New Total	0.85	0.60	0.67	0.19
Significance Thresholds	54	54	82	54
Significant Impact from Net New Emissions?	No	No	No	No

Table AQ-5: Project Operational Pollutant Emissions - Year 2023
(tons per year)

Emission Source Category	ROG	NOx	PM₁₀	PM_{2.5}
Allen Elementary School – Existing Configuration (410 students, 28,672 sq. ft.)				
Area	0.13	0.00	0.00	0.00
Energy	0.00	0.02	0.00	0.00
Mobile	0.08	0.23	0.31	0.09
Existing Total	0.21	0.25	0.31	0.09
Allen Elementary School – Project Configuration (520 students, 55,514 sq. ft.)				
Area	0.25	0.00	0.00	0.00
Energy	0.00	0.04	0.00	0.00
Mobile	0.10	0.29	0.39	0.11
Project Total	0.35	0.33	0.40	0.11
Allen Elementary School – Net New Emissions				
Area	0.12	0.00	0.00	0.00
Energy	0.00	0.02	0.00	0.00
Mobile	0.02	0.06	0.08	0.02
Net New Total	0.14	0.08	0.08	0.02
Significance Thresholds	10	10	15	10
Significant Impact from Net New Emissions?	No	No	No	No

A screening health risk assessment (HRA) for TAC and particulate exposures to nearby sensitive receptors from Project construction activities was conducted following guidelines established by the California Office of Environmental Health Hazard Assessment (OEHHA 2015) and the BAAQMD (2012).

Cancer risk is the probability of developing cancer from a lifetime exposure (i.e., 70 years) to carcinogenic substances. The likelihood of other adverse chronic health impacts unrelated to cancer are measured using a hazard index (HI) defined as the ratio of a project's incremental annual TAC concentration to a published reference exposure level (REL) as determined by OEHHA (which for DPM is 5 µg/m³). Project incremental cancer risks and HI were estimated by applying established DPM toxicity factors to the construction equipment exhaust DPM concentrations estimated by the SCREEN3 model (Lakes Environmental).

As shown in Table AQ-6, the cancer risk from Project construction DPM at the existing adjacent residential uses most exposed to TACs from Project construction would be 2.67 additional cancer cases per million people

exposed, which is below the project-level CEQA threshold for cancer risk. The HI from Project construction DPM would be 0.007, which is well below the BAAQMD threshold for chronic hazard. But the modeled annual PM_{2.5} concentration from Project construction would be 0.34 µg/m³, which exceeds the Project-level CEQA threshold (0.3 µg/m³).

Implementation of Mitigation Measure AQ-1, below, would assure that annual average PM_{2.5} concentrations at the existing adjacent residential receptors due to Project construction would be well below the CEQA PM_{2.5} threshold (and would substantially reduce cancer risk and chronic hazard, as well), as also shown in Table AQ-6. With this mitigation measure, this impact would be reduced to a **less-than-significant** level.

After it is operational, the Project would not include substantial stationary TAC emission sources nor add substantial mobile TAC emission sources (i.e., by BAAQMD definition, daily incremental traffic volumes of 10,000 or more)

As also shown in Table AQ-6, the cumulative TAC exposure at the MESR would be considerably below the BAAQMD cumulative thresholds for cancer risk, chronic hazard and annual PM_{2.5} concentration.

To reduce the exposure of local sensitive receptors to PM₁₀ and PM_{2.5} in the fugitive dust released during Project construction, the BAAQMD *Guidelines* also require that all Bay Area construction projects implement Best Management Practices (BMPs) to control fugitive dust emissions. Thus, the following basic control measures must be implemented by the Project construction contractor:

BAAQMD Required Dust Control Measures: The construction contractor shall reduce construction-related air pollutant emissions by implementing BAAQMD's basic fugitive dust control measures, including:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved surfaces shall be limited to 15 miles per hour.

- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
 - A publicly visible sign shall be posted with the telephone number and person to contact at the Union School District regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be included to ensure compliance with applicable regulations.
- d) Project operation would not introduce substantial sources of odor emissions to the area. However, the Project's diesel-powered construction equipment would emit odorous exhaust that could impact existing local residents. But since the Project construction activities would be short-term (i.e., about 9 months total) and most local odor-sensitive receptors (i.e., the existing low-density residential neighborhoods) are at distances greater than a few hundred feet from the site center, construction odor emissions would not affect a substantial number of people for a substantial time, nor be substantially objectionable to any particular receptor while construction is underway. Therefore, this impact would be **less than significant**.

Mitigation Measures

Mitigation Measure AQ-1. The Project construction contractor shall implement the following measures to further reduce construction-related diesel particulate exhaust emissions:

- All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:
- All Project diesel-powered construction equipment shall have engines rated at least EPA Tier 3, with Tier 4 equipment substituted wherever possible to obtain the maximum possible DPM emissions reduction from Project equipment.

Table AQ-6: Project and Cumulative TAC Impacts on Maximally Exposed Sensitive Receptor (MESR) in the Project Site Vicinity

BAAQMD Source #	Facility	Address	Cancer Risk	Chronic Hazard Index	PM _{2.5} Concentration
From Local Permitted Stationary TAC Sources*					
109421	San Bruno Chevron (Gasoline Dispensing Facility)	512 El Camino Real	0.159	0.001	----
100273	San Bruno Fire Station (Gasoline Dispensing Facility)	512 El Camino Real	0.073	< 0.001	----
22101	G W Williams Co (Northgate)	709 Camino Plaza	0.199	< 0.001	----
From Major Local Roadways**					
El Camino Real			1.607	0.002	0.023
From Project Sources***					
Project Construction TAC Impacts <u>before</u> mitigation			2.67	0.07	0.34
Project-Level Significance Thresholds			10	1.0	0.3
Significant Project Construction Impact <u>before</u> mitigation?			No	No	Yes
Project Construction TAC Impacts <u>after</u> mitigation			1.67	0.04	0.22
Significant Project Construction Impact <u>after</u> mitigation?			No	No	No
From Cumulative Sources (after Project Mitigation)					
Cumulative Sources TAC Impact			3.71	0.05	0.24
Cumulative Significance Thresholds			100	10	0.8
Significant Cumulative Impact?			No	No	No

*The BAAQMD's Stationary Source Screening Analysis Tool and Distance Multiplier Tool were used to estimate the maximum cancer risk, hazard index, and PM_{2.5} concentration at the existing residences most exposed to Project construction TAC emissions.

**The BAAQMD's Roadway Screening Calculator was used to estimate maximum cancer risks, hazard indexes, and PM_{2.5} concentrations at the closest existing residences about 300 feet west of El Camino Real.

***Project construction cancer risk, chronic hazard and PM_{2.5} increments were estimated by the SCREEN3 dispersion model using Project construction equipment TAC emission estimates from the CalEEMod model. Project construction cancer risk, chronic hazard and PM_{2.5} would be reduced by about 40% by requiring that Project construction equipment have at least EPA-rated Tier 3 diesel engines. Project construction health risks could be reduced even further (i.e., > 90%) by requiring retrofit of diesel particulate filters (DPF) to the Tier 3 engines or for all construction to use Tier 4 diesel engines.

IV. Biological Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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 Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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?				X

Discussion

- a) The project site is a fully developed school campus in a completely urbanized neighborhood. There are a few ornamental trees near the existing school buildings, and stands of large native and non-native trees along the western, southern, and eastern site perimeters. The project site is in a developed condition and does not contain any natural habitats, noise and activity levels on the site are high due to school activities and regular use of the athletic field, the site is in an urban area and is isolated from open space/natural habitats; these factors limit the potential for special-status species to occur. However, special-status birds have the potential to occur on the project site. The active nests of most native bird species are protected by the Migratory Bird Treaty Act (16 U.S.C. 704) and the California Fish and Game Code (Section 3503). Various common bird species, including raptors (e.g., Cooper's hawk), could nest in the trees on the site. Therefore, in the absence of avoidance measures, active nests of birds protected by the Migratory Bird Treaty Act and California Fish and Game Code could be disturbed by tree removal or by construction-related noise. The implementation of Mitigation Measure BIO-1, below, and AES-1, above, would reduce the impact to protected bird nests to a **less-than-significant** level.

The project site is located on a developed school campus site, and there are no natural habitats present in the proposed construction area. The construction boundary includes paved playfields, buildings and courtyards, an asphalt-paved parking lot, and a turf baseball field. Most special-status plant species known from the project area are associated with salt marsh, serpentine, woodland, or grasslands habitats; these or other natural habitat types are not present on the project site. Given the absence of suitable habitat, no special-status plant species are expected to occur. There would be **no impact** on special-status plant species.

- b, c) There are no wetlands or riparian features on the site. Sensitive plant communities are communities that are of limited distribution statewide or within a county or region and are often vulnerable to environmental effects of projects. These communities may or may not contain special-status species or their habitat. The most current version of CDFW's *List of California Terrestrial Natural Communities* indicates which natural communities are of special-status given the current state of the California classification. As previously discussed, the project site consists of an existing developed site. Therefore, no sensitive plant communities are present and the project would have **no impact** to riparian habitats or other sensitive biological communities.

Wetlands, creeks, streams, and permanent and intermittent drainages are subject to the jurisdiction of the U.S. Army Corps of Engineers (ACOE) under Section 404 of the Federal Clean Water Act (CWA). The California Department of Fish and Wildlife (CDFW) also

generally has jurisdiction over these resources, together with other aquatic features that provide an existing fish and wildlife resource pursuant to Sections 1602-1603 of the California Fish and Game Code. The CDFW asserts jurisdiction to the outer edge of vegetation associated with a riparian corridor. There are no wetlands or water habitats on the site. Therefore, the project would have **no impact** to wetlands or other water habitats.

d) Wildlife corridors are described as pathways or habitat linkages that connect discrete areas of natural open space otherwise separated or fragmented by topography, changes in vegetation, and other natural or manmade obstacles such as urbanization. The project site is located in an urban area and is bordered on all side by dense development. Therefore, the project does not link areas of open space and would not serve as part of a wildlife movement corridor. Given the above, the proposed project would not substantially interfere with the local or regional movement of wildlife species. Therefore, the project would have **no impact** on wildlife movement.

e) The City of San Bruno has a Heritage Tree Ordinance that applies to:

- Any native bay (*Umbellularia californica*), buckeye (*Aesculus species*), oak (*Quercus species*), redwood (*Sequoia sempervirens*), or pine (*Pinus radiata*) tree that has a diameter of six (6) inches or more measured at fifty-four (54) inches above natural grade;
- Any tree or stand of trees designated by resolution of the city council to be of special historical value or of significant community benefit;
- A stand of trees, the nature of which makes each dependent on the others for survival; or
- Any other tree with a trunk diameter of ten (10) inches or more, measured at fifty-four (54) inches above natural grade.

The Ordinance declares such trees, whether located on City or private property, to be an asset to the community at large and provides penalties for removing or improperly pruning these trees. A permit may be required for removal of any such trees, and, if applicable, tree replacement would be required at the direction of the City Arborist. However, as the District is engaging in a “sovereign activity” it enjoys “sovereign immunity” from complying with local regulations such as this Ordinance. Therefore the District is not required to comply with the City’s Heritage Tree Ordinance. Nonetheless, removal of “heritage trees” as defined in the City’s ordinance may be considered a significant impact under CEQA.

In addition to the City’s Ordinance, the project would be required to implement Board Policy 3510 that designates three species of trees as native and protected. coastal live oak, coast redwood and coastal bay laurel.

An arborists report has been prepared to address potential tree loss resulting from the project. That report identified 57 trees on the site and two groves of trees on adjacent properties that overhang the site. There are 11 live oaks and 3 redwoods on the site. There are no bay laurels on the site.

Live Oaks #21-#26 are in an area where they may be able to remain (they are not within a building footprint). Live oak #29 is too close to the Kindergarten Building and will need to be removed. Live oaks #46-#49 are along Elm Ave. and should be able to be preserved. Redwoods #32 and #36 are also too close to the Kindergarten Building and would be removed. Redwood #37 is on the neighbor's property and would remain. In total, the project would potentially remove as few as three "District Protected" trees. All three are reported in "good" health and the redwoods are substantial in size. Mitigation Measure AES-1, above, would assure that the **potentially significant** impact of protected tree removal is reduced to a **less-than-significant** level.

The visual impacts of tree removal are addressed in the Aesthetics section of the document. The biological impacts are addressed under Item a, above.

Compliance with the City's Heritage Tree Ordinance would assure that this impact is **less than significant**.

- f) The site is not within any Habitat Conservation Plan or Natural Communities Conservation Plan area. Therefore the project would have **no impact** with respect to these plans.

Mitigation Measures

Mitigation Measure BIO-1: Wherever possible, any tree removal should occur during the period of September 1 to January 31, which is outside of the nesting season. If construction activities and/or tree removal would commence anytime during the nesting/breeding season of native bird species potentially nesting near the site (typically February through August in the project region), a pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks of the commencement of construction activities. If construction during the nesting season ceases for more than 10 days or moves to a new locale on the site, nesting bird surveys shall be conducted prior to the restart of work.

If active nests are found in areas that could be directly affected or are within 200 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance 50-foot buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged.

V. Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	X			
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?		X		

Background

This analysis considers the project's impact to historical and archaeological resources, and human remains on the project site. A detailed cultural resources assessment has been conducted for the site by Solano Archaeological Services (SAS, January 6, 2020). That assessment included a literature review, database search, and intensive pedestrian survey. It found no evidence of any cultural resources, historic or archaeological, on the site. Non-confidential portions of that study are available for review at the District offices.

A Historic Resources Assessment was prepared by William Kostura, Architectural Historian (March 2020). That analysis found that the existing school buildings on the site are eligible for the National Register of Historic Places because the buildings and overall campus layout are very early examples of modernist architecture in the Bay Area.

Discussion

- a) As noted above, the architectural historian's assessment of the existing school found it to be eligible for the national Register of Historic Places because it is one of the earliest examples of modernist architecture in the San Francisco Bay Area. Because elimination of a significant historic resource triggers a mandatory finding of significance, this impact would be **significant and unmitigable**, as is addressed in detail in the EIR.

- b, c) No cultural resources were encountered. However, it is important to note that surface pedestrian surveys cannot always determine what archaeological resources might be present in subsurface contexts. Such buried resources have the potential to be California Register of Historic Resources (CRHR) - eligible and as such any impacts to them would be considered a potentially significant impact. Mitigation Measures CULT-1 would reduce this potentially significant impact to a **less-than-significant** level.

Although no prehistoric or historic-era human remains have been identified within or near the project site, it is possible that presently undocumented human interments may be uncovered during excavation activities. This **potentially significant** impact would be a potentially significant. Implementation of Mitigation Measures CULT-2 would reduce this impact to a **less-than-significant** level.

Mitigation Measures

Mitigation Measure CULT-1: Archaeological Deposits. If an inadvertent discovery of cultural materials (e.g. unusual amounts of shell, animal bone, bottle glass, ceramics, structure/building remains, etc.) is made during project-related construction activities, ground disturbances in the area of the find shall be halted within a 50-foot radius of the discovery and a qualified archaeologist must be retained to document the discovery, and assess its significance. The archaeologist shall determine whether the resource is potentially significant as per the CRHR and recommend treatment. Any recommended treatment shall be implemented.

Mitigation Measure CULT-2: Human Remains. In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the San Mateo County Sheriff/Coroner and a qualified professional archaeologist. The Sheriff/Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified

in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist shall consult with a Most Likely Descendent (MLD) determined by the NAHC regarding the removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity. Construction activities shall not resume until either the human remains are exhumed, or the remains are avoided via Project construction design change.

VI. Energy

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			X	

Discussion

- a) The Project would not result in wasteful, inefficient, or unnecessary consumption of energy, given (1) that the Project would construct new elementary school facilities on the site of an existing elementary school (with no increase in elementary school student enrollment), and relocate an existing kindergarten in San Bruno to this site; and (2) Project compliance with State of California energy conservation regulations and the City of San Bruno General Plan (Chapter 8, Public Facilities and Services, 8-7 Utilities; as referenced in the discussion below). Therefore, this impact would be **less than significant**.
- b) The California State Building Standards Commission adopted updates to the California Green Building Standards Code (CALGreen), which went into effect in January 2011. CALGreen contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation. CALGreen provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. CALGreen also requires building commissioning, which is a process for verifying that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency. CALGreen provides the minimum standard that buildings need to meet in order to be certified for occupancy but does not prevent a local jurisdiction from adopting more stringent requirements. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live

and work; and (3) reduce energy and water consumption.

The City of San Bruno General Plan (Chapter 8, Public Facilities and Services, 8-7 Utilities) contain the following policies regarding energy efficiency:

PFS-62 Develop and implement a Green Building Design Ordinance and design guidelines ... to promote energy efficiency.

- Require the use of Energy Star appliances and equipment;
- Incorporate green building methods meeting the equivalent of LEED Certified "Silver" rating or better; and

PFS-63 Require that all new development complies with California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6).

PFS-65 Require new development to incorporate passive heating and natural lighting strategies if feasible and practical. These strategies should include, but are not limited to, the following:

- Using building orientation, mass and form, including façade, roof, and choice of building materials, color, type of glazing, and insulation to minimize heat loss during winter months and heat gain during the summer months;
- Designing building openings to regulate internal climate and maximize natural lighting, while keeping glare to a minimum; and
- Reducing heat-island effect of large concrete roofs and parking surfaces.

PFS-66 Enforce landscape requirements that facilitate efficient energy use or conservation, such as drought-resistant landscaping and/or deciduous trees along southern exposures.

The Project would be built in accord with California's CALGreen standards and, thus, would not conflict with San Bruno General Plan energy conservation policies. Therefore, this impact would be **less than significant**.

VII. Geology and Soils

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:		X		
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.				X
ii) Strong seismic ground shaking?		X		
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?		X		
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?		X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			X	

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	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 wastewater?				X
f) Directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature?				X

Background

This analysis considers the project's potential impacts on geologic and paleontological features and conditions on the project site.

A geotechnical study of the site was prepared for the site by Miller Pacific Engineering Group (*Geotechnical Investigation, San Bruno Park Elementary School, Allen Elementary School, San Bruno, CA*, November 19, 2019) add to references. The discussions below are based on the findings of that study.

Regional and Site Geologic and Topographic Conditions

Regional geologic mapping (Knudsen et al, 1997) indicates the campus is underlain by early or middle Pleistocene alluvial deposits. This formation consists of interbedded layers of unconsolidated gravel, sand, silt, and clay. The nearest trace of the San Andreas Fault is mapped approximately 1.6-miles southwest of the project site.

The project site is located within a residential area of San Bruno bounded by Angus Avenue W to the northwest, Elm Avenue to the southwest, and Linden Avenue to the northeast. Surrounding grades are relatively level, with site elevations ranging from about +70- to +40-feet above sea level. The campus is located on a gentle, approximately 6%, southeast facing slope. The existing elementary school was "stepped" into the hillside by excavating upslope and filling downslope to create level building pads. An approximately 3-foot tall retaining wall is supporting an approximate 7-foot tall, 2:1 (horizontal:vertical) slope is located on the southwest end of the campus. A 2:1 vegetated fill slope, up to 10-feet in height, is located on the north- and southeastern property lines.

Exploratory soil borings have been conducted on the site to determine subsurface geologic conditions. The subsurface exploration generally confirms the regionally-

mapped geologic conditions at the site. The project site is underlain by interbedded alluvial deposits, medium stiff to very stiff sandy clay, and loose to dense silty and clayey sands.

Groundwater was encountered in the borings at depths between 14- and 30-feet below the ground surface. Because the borings were not left open for an extended period of time, a stabilized depth to groundwater was not observed. However, groundwater levels fluctuate seasonally with higher levels expected during the wet winter months. The San Bruno Fire Department located to the immediate southeast of Allen Elementary School has groundwater monitoring well data. The groundwater data from these monitoring wells indicate an average highest groundwater level of 4-feet below the ground surface. However, the Fire Department site elevation is 10- to 30-feet lower than project site.

Seismic Conditions

The project site is located within a seismically active region that includes the Central and Northern Coast Mountain Ranges. As shown on the Fault Map, Figure 5, several active faults are present in the area including Maacama, Healdsburg, Rodgers Creek, San Andreas, and Hayward Faults, among others. An “active” fault is defined as one that shows displacement within the last 11,000 years and, therefore, is considered more likely to generate a future earthquake than a fault that shows no evidence of recent rupture. The California Geologic Survey has mapped various active and inactive faults in the region (CDMG, 1972 and 2000). The San Andreas Fault is the nearest known active fault and is located approximately 1.6-miles southwest of the site (Caltrans ARS, 2019).

The site will likely experience moderate to strong ground shaking from future earthquakes originating on any of several active faults in the San Francisco Bay region. The historical records do not directly indicate either the maximum credible earthquake or the probability of such a future event. To evaluate earthquake probabilities in California, the USGS has assembled a group of researchers into the “Working Group on California Earthquake Probabilities” (USGS 2003, 2008; Field, et al 2015) to estimate the probabilities of earthquakes on active faults.

Conclusions from the most recent studies indicate there is a 72% chance of an $M > 6.7$ earthquake in the San Francisco Bay Region between 2014 and 2043. The highest probability of an $M > 6.7$ earthquake on any of the active faults in the San Francisco Bay region by 2043 is assigned to the Hayward/Rodgers Creek Fault system the site at 33% followed by the San Andreas Fault at 22%.

Discussion

- a) i. Based on available published geologic information, the project site is not

located within an Alquist-Priolo Earthquake Fault Zone. The potential for fault rupture on the site is therefore considered to be low and **no impact** would occur. (Miller Pacific, 2019)

ii. The site would be subject to moderate to strong ground shaking in the event of a major earthquake on any of the regional fault zones. Due to its close proximity, the San Andreas Fault (approximately 1.75 miles southwest) presents the highest potential for strong ground shaking. This shaking could damage improperly constructed buildings and cause ground failures that also could affect the structure and infrastructure (these ground failures are discussed below). This impact is **potentially significant** but can be reduced to a **less-than-significant** level with implementation of Mitigation Measure GEO-1, below.

iii. Miller Pacific evaluated the site for liquefaction potential and determined that it could be subject to total settlement of up to 1.7 inches, with differential settlement up to about 0.8 inches, over 30 feet, on the site. Miller Pacific also evaluated the potential for lateral spreading, seismic-induced ground settlement, and lurching and ground cracking on the site and determined those not to pose a significant risk to the proposed buildings.

The impact associated with liquefaction and differential settlement hazards would be reduced to a **less-than-significant** level by implementation of Mitigation Measure GEO- 2, below.

- b) The nearly level site does not contain any slopes that would be subject to landslide hazards. Substantial topographic changes would occur on the site- it would be benched into upper playfield areas and lower school building areas, with ramps connecting the two levels. In total, four benches would be created, with about five feet of elevation difference between each bench.

Sandy soils on moderate slopes or clayey soils on steep slopes are susceptible to erosion when exposed to concentrated water runoff. Sandy soils were observed near or at the ground surface during our subsurface exploration. Additionally, a 2:1 fill slope is located on the north- and southeastern end of the campus. Development of the proposed Project would require disturbance and grading, as described in the Project Description. Approximately 30,000 cubic yards of material would be graded on the site to provide level areas for the new buildings and play areas. Approximately 21,300 cu. yds. would be cut and about 9200 cu. yds. will be fill. Approximately 12,000 cubic yards of material would be hauled off of the site, and the remainder would be balanced on the site. If grading were to occur during the rainy season, substantial erosion could result. Therefore, Miller Pacific judged erosion poses a moderate risk to the project site.

Implementation of Mitigation Measure GEO-3, below, would reduce this impact to **less than significant**. Mitigation Measure HYDRO-1, in the Hydrology and Water Quality section of this document, also would reduce this potential impact.

- c) Please see response to item a) iii, above. This impact would be reduced to a **less-than-significant** level by implementation of Mitigation Measure GEO-2, below.
- d) Expansive soils shrink and swell with fluctuations in moisture content and are capable of exerting significant expansion pressures on building foundations, interior floor slabs, and exterior flatwork. Distress from expansive soil movement can include cracking of brittle wall coverings (stucco, plaster, drywall, etc.), cracked door and/or window frames, and uneven floors and cracked slabs. Flatwork, pavements, and concrete slabs-on-grade are particularly vulnerable to damage from soil swelling and shrinking highly plastic and/or expansive soils were not observed by Cornerstone during their subsurface exploration. Therefore, the risk of expansive soil affecting the proposed improvements is low. The impact would be **less than significant**.
- e) The proposed project would be served by the City's sewer system and would not include any septic systems. Therefore, **no impact** would occur with respect to adequacy of site soils for septic systems.
- f) The foundation work would occur primarily within the areas of recent colluvium and fill, therefore potential impacts to paleontological resources would be considered **less than significant**.

Mitigation Measures

Mitigation Measure GEO-1. The project structures and foundations shall be designed in accordance with the most recent version of the California Building Code. Recommended seismic coefficients provided in the Miller Pacific report shall be included in the project design.

Mitigation Measure GEO-2. The project's site clearing, site preparation, subgrade preparation and stabilization, fill, drainage, and foundation systems shall be designed and constructed per the specifications set forth on the project geotechnical report (Miller Pacific 2019).

Mitigation Measure GEO-3. The project shall include a site drainage system to collect surface water and discharging it into an established storm drainage system. The project Civil Engineer or Architect shall be responsible

for designing the site drainage system and, an erosion control plan could be developed prior to construction per the current guidelines of the California Stormwater Quality Association's Best Management Practice Handbook.

VIII. Greenhouse Gas Emissions

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

Background

Greenhouse gases (GHGs) are atmospheric gases that capture and retain a portion of the heat radiated from the earth after it has been heated by the sun. The primary GHGs are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), ozone, and water vapor. While GHGs are natural components of the atmosphere, CO₂, CH₄, and N₂O, are also emitted in substantial quantities from human activities and their accumulation in the atmosphere over the past 200 years has substantially increased their concentrations. This accumulation of GHGs has been implicated as the driving force behind global climate change.

Human emissions of CO₂ are largely by-products of fossil fuel combustion, whereas CH₄ results from off-gassing associated with organic decay processes in agriculture, landfills, etc. Other GHGs, including hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, are generated by certain industrial processes. The global warming potential of GHGs are typically reported in comparison to that of CO₂, the most common and influential GHG, in units of “carbon dioxide- equivalents” (CO₂e).

There is international scientific consensus that human-caused increases in GHGs have and will continue to contribute to global warming. Potential global warming impacts in California may include, but are not limited to, loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years. Secondary effects are likely to include a global rise in sea level, impacts to agriculture, changes in disease vectors, and changes in habitat and biodiversity.

Discussion

- a) The Bay Area Air Quality Management District (BAAQMD) is the primary

agency responsible for air quality regulation in the nine-county San Francisco Bay Area Air Basin. As part of that role, the BAAQMD has prepared *CEQA Air Quality Guidelines* that provide CEQA thresholds of significance for operational GHG emissions from land use projects (i.e., 1,100 metric tons of CO₂e per year, which is also considered the definition of a cumulatively considerable contribution to the global GHG burden and, therefore, of a significant cumulative impact), but has not defined thresholds for project construction GHG emissions. The *Guidelines* methodology and thresholds of significance have been used in this Initial Study's analysis of potential GHG impacts associated with the Project.

The CalEEMod model was used to quantify GHG emissions associated with Project construction activities (for informational purposes), as well as long-term operational emissions produced by Project motor vehicles, energy and water use, and solid waste generation. CalEEMod incorporates GHG emission factors for motor vehicles, electricity from central electric utilities, and water use and solid waste generation.

The estimated construction GHG emissions are 316.0 metric tons of CO₂e (for which there is no BAAQMD CEQA significance threshold). The Project's estimated operational GHG emissions are presented in Table GHG-1. The Project's GHG operational emissions would be 106.0 metric tons per year, which is substantially below the BAAQMD threshold of 1100 metric tons. Therefore, this impact would be **less than significant**.

Table GHG-1: Project Operational Greenhouse Gas Emissions (Metric Tons Per Year)

Project GHG Source	CO₂	CH₄	N₂O	CO₂e
Area	< 0.1	< 0.1	< 0.1	< 0.1
Energy Use	58.2	< 0.1	< 0.1	58.4
Motor Vehicles	228.6	< 0.1	< 0.1	228.8
Solid Waste Disposal	7.1	0.4	< 0.1	17.5
Water Use	3.5	< 0.1	< 0.1	4.3
Total	309.1			
Significance Thresholds	1100			
Significant Impact?	No			

- b) Assembly Bill 32 (AB32), the California Global Warming Solutions Act, requires the CARB to lower State GHG emissions to 1990 levels by 2020—a 25% reduction statewide with mandatory caps for significant GHG emission sources. AB32 directed CARB to develop discrete early actions to reduce

GHG while preparing the Climate Change Scoping Plan in order to identify how best to reach the 2020 goal. Statewide strategies to reduce GHG emissions to attain the 2020 goal include the Low Carbon Fuel Standard (LCFS), the California Appliance Energy Efficiency regulations, the California Renewable Energy Portfolio standard, changes in the motor vehicle corporate average fuel economy (CAFE) standards, and other early action measures that would ensure the state is on target to achieve the GHG emissions reduction goals of AB 32.

The State Building Standards Commission adopted updates to the California Green Building Standards Code (CALGreen), which went into effect in January 2011. CALGreen contains requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, and site irrigation conservation. CALGreen provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. CALGreen also requires building commissioning, which is a process for verifying that all building systems, like heating and cooling equipment and lighting systems, are functioning at their maximum efficiency. CALGreen provides the minimum standard that buildings need to meet in order to be certified for occupancy, but does not prevent a local jurisdiction from adopting more stringent requirements. CALGreen is intended to (1) reduce GHG emissions from buildings; (2) promote environmentally responsible, cost-effective, healthier places to live and work; and (3) reduce energy and water consumption.

The BAAQMD's *Spare the Air, Cool the Climate* (2017 Plan), focuses on two closely-related goals: protecting public health from air pollutant exposures and protecting the climate. Consistent with the GHG reduction targets adopted by the State of California, the 2017 Plan lays the groundwork for a long-term effort to reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The 2017 Plan defines an integrated, multipollutant control strategy to reduce emissions of particulate matter, toxic air contaminants (TACs), ozone precursors and greenhouse gases (GHG).

The 2017 Plan GHG control strategy is based on the following key priorities:

- Reduce emissions of “super-GHGs” such as methane, black carbon and fluorinated gases.
- Decrease demand for fossil fuels (i.e., gasoline, diesel and natural gas).
 - Increase efficiency of the energy and transportation systems.
 - Reduce demand for vehicle travel, and high-carbon goods and

services.

- Decarbonize the energy system.
 - Make the electricity supply carbon-free.
 - Electrify the transportation and building sectors.

Thus, the Project would not conflict with the goals and policies of AB32 and the CCAP. The project would have a **less-than-significant** impact related to this issue.

The Project site is accessible by SamTrans bus routes. The Project would be required to obtain building permits for construction, which would ensure compliance with CALGreen (Title 24). Thus, the Project would not conflict with the goals and policies of AB32 and the Bay Area's 2017 Plan. The project would have a **less-than-significant** impact related to this issue.

IX. Hazards and Hazardous Materials

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?		X		
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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?				X
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 or excessive noise for people residing or working in the Project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				X
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Discussion

- a) Project construction activities may involve the use and transport of hazardous materials. These materials may include fuels, oils, mechanical fluids, and other chemicals used during construction. Transportation, storage, use, and disposal of hazardous materials during construction activities would be required to comply with applicable federal, state, and local statutes and regulations. Compliance would ensure that human health and the environment are not exposed to hazardous materials. In addition, the construction contractor would be required to implement a Stormwater Pollution Prevention Plan during construction activities to prevent contaminated runoff from leaving the Project site. Therefore, no significant impacts would occur during construction activities.

In addition, the proposed Project would not be a large-quantity user of hazardous materials. Small quantities of hazardous materials would likely routinely be used on site, including cleaning solvents (e.g., degreasers, paint thinners, and aerosol propellants), paints (both latex- and oil-based), acids and bases (which are included in many cleaners), disinfectants, herbicides, and fertilizers. These substances would be stored in secure areas and would comply with all applicable storage, handling, usage, and disposal requirements. The potential risks posed by the use and storage of these hazardous materials are limited primarily to the immediate vicinity of the materials. Any transport of these materials would be required to comply with various federal and state laws regarding hazardous materials transportation.

In summary, the proposed Project would not create a significant hazard to the public or the environment from routine transport, use, or disposal of hazardous materials and impacts would be **less than significant**.

- b, d) The site is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962 (Cortese List)². However, the existing buildings proposed for demolition and removal may have lead-based paint (LBP), polychlorinated biphenals (PCBs), and/or asbestos-containing materials (ACM), which can pose health hazardous when disturbed or transported. The District would conduct a screening for these materials prior to demolition. Any demolition materials with LBP, PCBs, or ACM would be stabilized and/or appropriately contained prior to transport as described in Mitigation Measure HAZ-1, below. On-

² https://www.envirostor.dtsc.ca.gov/public/map/?global_id=43990007

site storage and/or use of large quantities of materials capable of impacting soil and groundwater would not typically be required for this type of project. Therefore, risk of contamination from upset would be mitigated to a **less-than-significant level**.

- c) One school, Edgemont School, at 500 Acacia Avenue, is located half a block south of the project site. Additionally, students would remain at the existing school buildings on the site while the new school buildings are constructed. As described under response to items IXa and b, above, and in the Air Quality dust emissions discussion, construction and operation of the project would not emit hazardous materials outside of the project site. Therefore, the project would have a **less-than-significant** potential to significantly affect children or adults at the nearby school.
- e) The project site is less than a mile from San Francisco International Airport. However, it is outside of the outer boundary of the airport safety zone³ the Airport Land Use Plan area but within the FAA 14 CFR Part 77 Conical Surface (which applies limits to heights of structures within that zone). The project would not change the land use or substantially increase the height of the buildings, which would remain one or two stories. Therefore, it would not present a hazard to air safety, and **no impact** would occur.
- f) Construction and operation of the project are not expected to interfere with the City of San Bruno's emergency response. The proposed drop-off zone would reduce on-street congestion associated with drop offs on Angus Avenue West, and would not interfere with operations at the fire station with rear access on Linden Avenue. The staff parking would be on Linden Avenue, but would have minimal traffic associated with it, as drop-off and pick-up of children would be discouraged at this access. Therefore, it would not adversely affect emergency response or access. **No impact** would occur.
- g) The project is in the highly urbanized, developed San Francisco Peninsula plain. It is completely surrounded by fully developed urban lands, and the nearest wildfire-hazard areas are several miles west of the site. Therefore, the project would have **no impact** with respect to wildfire hazards.

³ City/County Governments of San Mateo County, California, July 2012. *Comprehensive Airport Land Use Plan, San Francisco International Airport*. Exhibit IV-4- Airport Influence Area B – Southeast Side -- Land Use Policy Action/Project Referral Area

Mitigation Measures

Mitigation Measure HAZ-1. Prior to demolition of buildings on the project site, a full asbestos and lead based paint survey of the buildings shall be performed by qualified asbestos and lead-based paint inspectors/consultants. If asbestos-containing materials or lead-based paints are identified at any of the site buildings proposed for renovation and or demolition, standard asbestos and lead-based paint abatement and dust control measures shall be implemented in compliance with OSHA and Cal/OSHA statutes. This work shall be performed at a minimum with the controls and work practices described in Title 8 CCR 1532.1, which describes work, practices and respiratory protection. At a minimum, prior to demolition, any ACM and/or LBP shall be stabilized, and demolition of building materials that have potential contaminants be placed in appropriate covered containers prior to off-site removal to reduce the potential for airborne emissions. Similarly, the existing buildings shall be surveyed for PCB-containing equipment, light ballasts, and light tubes, and any such equipment shall be removed and disposed of appropriately prior to building demolition. All removal of potentially contaminated materials shall be conducted only by qualified personnel with appropriate training and certifications.

X. Hydrology and Water Quality.

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site; iii) 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; or iv) impede or redirect flood flows? 		X		
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	

Discussion

a, c, e) Under Section 402 of the Clean Water Act, the U.S. EPA has established regulations through the National Pollution Discharge Elimination System (NPDES) stormwater program to control stormwater discharges, including those associated with construction activities. The NPDES stormwater permitting program regulates stormwater quality from construction sites. The State Construction General Permit (CGP) requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) and the use of appropriate best management practices (BMPs) for erosion control and spill prevention during construction. Dischargers whose Projects disturb one or more acres of soil or whose Projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the CGP for Discharges of Stormwater Associated with Construction Activity (CGP Order 2009-0009-DWQ).

City of San Bruno stormwater pollution is regulated under the jurisdiction of the San Francisco Bay Regional Water Quality Control Board, Region 2 (Regional Board), the enforcement arm of the State Water Resources Control Board (Water Board). The Regional Board issues a National Pollutant Discharge Elimination (NPDES) Municipal Regional Permit (MRP) to the City of San Bruno and 75 other co-permittees that covers stormwater activities for most of the Bay Area. Permittees in San Mateo County, including the City of San Bruno, formed an association called the San Mateo County Water Pollution Prevention Program (SMCWPPP) to meet MRP permit regulations by sharing resources and collaborating on projects of mutual benefit. The MRP permit governs a variety of activities in the City of San Bruno such as industrial and commercial businesses, new and redevelopment projects, construction sites, storm drain operation and maintenance, creek monitoring, pesticide applications, and illegal dumping of water and other pollution in the City's storm drain.

The project would include nearly 30,000 cubic yards of grading, as described in the Project Description. During construction activities, there would be a potential for surface water to carry sediment from on-site erosion and small quantities of pollutants into the City's stormwater system and, ultimately, San Francisco Bay. Soil erosion may occur along Project boundaries during construction in areas where temporary soil storage may be required. Sediments eroded from the site may enter the storm drainage system, potentially degrading water quality.

Construction of the proposed Project also would require the use of gasoline and diesel- powered heavy equipment. Chemicals such as gasoline, diesel fuel, lubricating oil, hydraulic oil, lubricating grease, automatic transmission fluid, paints,

solvents, glues, and other substances would be used during construction. An accidental release of any of these substances could degrade the water quality of the surface water runoff and add additional sources of pollution into the drainage system.

The proposed Project would be required to comply with the State CGP. The District would be required to develop and implement a Construction Stormwater Pollution Prevention Plan (SWPPP) that identifies appropriate construction BMPs in order to minimize potential sedimentation or contamination of storm water runoff generated from the Project site during construction. The SWPPP would identify the risk level for erosion and sedimentation and how much monitoring of potential pollutants is required. Implementation of a SWPPP as required would ensure that the construction of the proposed Project would not violate any water quality standards or waste discharge requirements and reduce potential impacts to a less-than-significant level, as described in Mitigation Measure HYD-1.

As required under State Water Resources Control Board Order No. R2 2019-0004, the City of San Bruno requires regulated Projects, such as this one, to prepare a Stormwater Control Plan (SWCP). The SWCP would include post-construction stormwater treatment measures such as bio-retention facilities and source controlled BMPs. The SWCP also would address ongoing maintenance of those facilities.

Prior to the issuance of grading permits or building permits (whichever occurs first), the Project would be required to obtain coverage under the State CGP (NPDES General Permit for Stormwater Discharges Association with Construction Activity (Order 2009-0009 DWQ) by preparing a Stormwater Pollution Prevention Plan (SWPPP) and submitting it along with a notice of intent, to the San Francisco Bay RWQCB. The SWPPP shall identify a practical sequence for BMP implementation and maintenance, site restoration, contingency measures, responsible parties, and agency contacts. The SWPPP would include but not be limited to the following elements:

- Temporary erosion control measures would be employed for disturbed areas.
- No disturbed surfaces would be left without erosion control measures in place during the winter and spring months. Cover disturbed areas with soil stabilizers, mulch, fiber rolls, or temporary vegetation.
- Sediment would be retained on site by a system of sediment basins, traps, or other appropriate measures. Drop inlets shall be lined with filterfabric/geotextile.
- The construction contractor would prepare Standard Operating Procedures for the handling of hazardous materials on the construction site to eliminate or

reduce discharge of materials to storm drains. This may include locating construction-related equipment and processes that contain or generate pollutants in a secure area, away from storm drains and gutters, and wetlands; parking, fueling, and cleaning all vehicles and equipment in the secure area; designating concrete washout areas; and preventing or containing potential leakage or spilling from sanitary facilities.

- BMP performance and effectiveness would be determined either by visual means where applicable (e.g., observation of above-normal sediment release), or by actual water sampling in cases where verification of contaminant reduction or elimination (such as inadvertent petroleum release) is required by the RWQCB to determine adequacy of the measure.
- In the event of significant construction delays or delays in final landscape installation, native grasses or other appropriate vegetative cover would be established on the construction site as soon as possible after disturbance, as an interim erosion-control measure throughout the wet season.

The Project site slopes eastward and mostly covered with buildings and paved play areas and a parking lot. The project would, when completed, increase landscaped areas on the campus compared to existing conditions. It would therefore reduce impervious surface area on the site from about 48,780 sq. ft. to about 44,192 sq. ft. Therefore it would not increase runoff from the site compared with existing conditions. The site would continue to drain into the City's existing storm drain system on Linden Avenue. A construction stormwater program would be implemented during demolition and construction activities to assure that demolition materials and site soils do not enter the City's stormwater system. That stormwater drainage program would be reviewed by the City of San Bruno Public Works department prior to implementation. Therefore, impacts to runoff would be **less than significant**.

Potentially contaminated runoff from the new impervious areas would occur. Implementation of the Construction General Permit SWPPP requirements described above, as well as Mitigation Measures HYD-1 and HYD-2, below, would reduce the other water quality impacts described above to a **less-than-significant** level.

- b) The Water Division of the City of San Bruno Public Works Department is responsible for the efficient and effective operation and maintenance of the City's water supply and distribution systems. The City of San Bruno receives its water through 5 San Francisco Public Utilities Commission (SFPUC) turnouts and from 5 deep-water wells. The City also purchases water from the North Coast County Water District. The Public Works Water Division maintains a distribution system that includes 13 pressure zones, 21 pumps, 8 water tanks, 900 hydrants, and 100 miles of mains.

SFPUC water is filtered by the Harry Tracy plant (San Andreas Reservoir) and supplied to upper elevation areas of the community. Crystal Springs Supply Lines #2 or #3 deliver water to the lower elevations. The groundwater is blended with water from the SFPUC. Groundwater is typically used as a backup supply, and was not used in 2017-18. Through this complex network of interrelated systems, the Water Division maintains and operates the water supply and distribution systems so that water delivered to its customers meets all Federal and State water quality standards, pressure and quantity mandates, and meets secondary standards such as taste and color through active distribution system infrastructure assessment and flushing programs. Total demand in Fiscal Year 2017-18 was approximately 3 million gallons/day, the vast majority of which was SFPUC water.

The project would relocate some students currently at another school facility elsewhere in San Bruno, but would not increase overall student capacity. It would include low-flow fixtures and water-conserving landscaping, which would provide water supply efficiencies. This reduction in demand may be offset by the increased landscaping on the site. Overall, water demand would not change substantially compared with the existing school facilities. Therefore, the proposed Project would not contribute to depletion of groundwater supplies and **no impact** would occur to groundwater.

Because of the minimal expected increase in groundwater demand from the project, and because it would incorporate water conservation equipment, landscaping, and practices, it would not conflict with any groundwater management plan.

- d) The Federal Emergency Management Agency (FEMA) is recently updated its maps for San Bruno. The site is mapped as an “Area of Minimal Flood Hazards” (FEMA FIRM Flood Hazard Maps, Effective April 5, 2019, Panels 06081C0043F and 06081C0131F).

The project site is not within a the dam failure area (https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/Dam_Failure_Inundation.pdf). Therefore, the project would not impede flood waters nor increase flood hazards from that source.

Seiches and tsunamis are seismically induced large waves of water. Because of the distance of the site from any large water body and the elevation of the site well above sea level, there is no potential for a tsunami to affect this part of San Bruno. Therefore, the proposed Project would have **no impact** to future occupants of the project due to inundation by seiche, tsunami or mudflow.

Mitigation Measures

Mitigation Measure HYD-1: Prior to the issuance of grading permits for the proposed Project, the Project engineers shall prepare a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the Project site during construction.

Mitigation Measure HYD-2: The District shall prepare a long-term Stormwater Control Plan for the project site. It shall maintain in perpetuity the post-construction BMPs listed in the Stormwater Control Plan. The District shall make changes or modifications to the BMPs to ensure peak performance. The District shall be responsible for costs incurred in operating, maintaining, repairing, and replacing the BMPs. The District shall conduct inspection and maintenance activities and complete annual reports.

X. Land Use and Planning

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?			X	
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?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X

Discussion

- a) The proposed replacement school would be located within an urbanized area on an existing school campus. Because the project would redevelop a site with a use identical to the existing use, and the hazardous materials, noise, and air quality assessments indicate that the project would not have significant impacts after mitigation, the project would not have the potential to create substantial conflicts between uses or divide an established community. The impact would be **less-than-significant**.
- b) The project site is designated as Low Density Residential in City of San Bruno General Plan (adopted march 24, 2009), and zoned R-1, Single-Family Residential in the City of San Bruno Zoning Ordinance. The proposed replacement of the existing school use on the site is consistent with the General Plan and Zoning designations. The Project would have **no impact** on plan conformance.
- c) The Project site is not located within the boundaries of a habitat conservation plan or a natural community conservation plan; therefore, the Project would not conflict with any habitat plans and there would be **no impact**.

XI. Mineral Resources

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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?				X
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?				X

Discussion

- a, b) The Project site a developed school campus in an urban area, and is not identified in the City of San Bruno's General Plan as a site containing mineral resources that would be of local, regional, or statewide importance; therefore, the Project is not considered to have any impacts on mineral resources. The Project site is also outside of any areas designated by the State Mining and Geology Board as containing regionally significant PCC-grade aggregate resources (used in concrete). The Project site does not contain any known mineral deposits or active mineral extraction operations. Therefore, there would be **no impact** to mineral resources.

XIII. Noise

Would the Project result in:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a Project within the vicinity of a private airstrip or 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?			X	

Background

Sound is created when vibrating objects produce pressure variations that move rapidly outward into the surrounding air. The more powerful the pressure variations, the louder the sound perceived by a listener. The decibel (dB) is the standard measure of loudness relative to the human threshold of perception. Noise is a sound or series of sounds that are intrusive, objectionable or disruptive to daily life. Many factors influence how a sound is perceived and whether it is considered disturbing to a listener; these include the physical characteristics of sound (e.g., loudness, pitch, duration, etc.) and other factors relating to the situation of the listener (e.g., the time of day when it occurs, the acuity of a listener's hearing, the activity of the listener during exposure, etc.). Environmental noise has many documented undesirable effects on human health and welfare, either psychological (e.g., annoyance and speech interference) or physiological (e.g., hearing impairment and sleep disturbance).

Just as vibrating objects radiate sound through the air, if they are in contact with the ground, they also radiate acoustical energy through the ground. If such an object is

massive enough and/or close enough to an observer, the ground vibrations can be perceptible and, if the vibrations are strong enough, they can cause annoyance to the observer and, if still stronger, damage to buildings. Annoyance and structural damage correlate strongly with the velocity produced by the vibration source at receptor locations. The vibration metric most commonly used to correlate vibration levels with human annoyance and structural damage is the vibration decibel (VdB).

Environmental Setting

Motor vehicle noise is pervasive in almost all parts of San Bruno, particularly in areas near I-280, I-380, U.S. 101 and Camino Real, the city's highest volume surface street. Aircraft overflight noise also has a substantial influence in San Bruno due to its proximity to San Francisco International Airport (SFO), located just east of the city across U.S. 101. Two of SFO's four runways are oriented northwest-to-southeast; thus, the northeastern portions of San Bruno are situated beneath their arrival/departure flight tracks. Noise from trains operating on the Southern Pacific Railroad Line, which runs adjacent to Huntington Avenue, affect nearby residential areas in the eastern areas of San Bruno. Caltrain trains share this rail line and BART trains run on a separate track parallel to it. (*San Bruno General Plan*, Chapter 7.5 *Noise*).

The Project site is located in a predominantly residential area of San Bruno, about 1000 feet south of San Bruno Avenue, and a few hundred feet west of El Camino Real. It has been dedicated to educational uses for more than 100 years; the school has existed in its current form for about 60 years. Single-family residential uses surround the site to the north, west and south. Civic uses (i.e., library, City Hall, and a fire station) face the site to the east across Linden Avenue.

The Project site and vicinity were surveyed recently (i.e., on November 21, 2019 and December 11, 2019) to observe influential local noise sources and to measure typical daytime noise levels that the surrounding local residents and on-site students/staff are exposed to. This included the noise produced by the arrival/departure of students/staff on school days and noise from outdoor play/instruction activities on the school's external hard-court areas. Motor vehicle traffic on the surrounding local streets was the most common component of the local noise levels, with no audible contributions from larger, more distant roadways like El Camino Real, US 101 or I-280. Commercial airplane take-offs from SFO (at the rate of about one every 10 minutes) were the most substantial contributors to the local noise level average, as summarized in **Table NOI-1**.

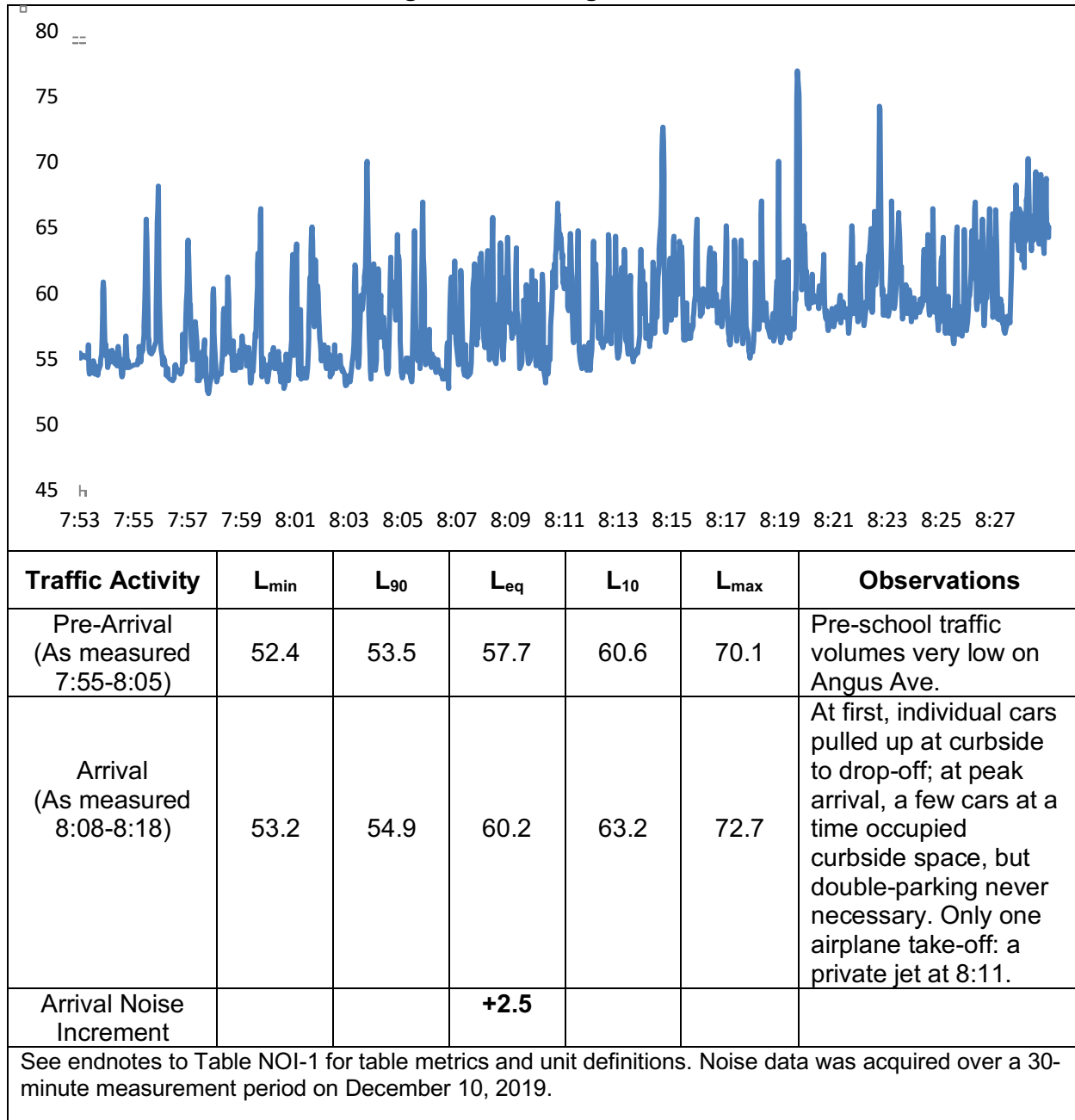
TABLE NOI-1: Noise Measurement Data and Survey Observations

Measurement Location	L _{min}	L ₉₀	L _{eq}	L ₁₀	L _{max}	Observations
Elm Avenue, east side, across from #585 residence (as measured 11/21/19 12:58-13:28)	49.1 <u>49.1</u>	51.2 <u>51.2</u>	61.3 <u>55.2</u>	61.0 <u>57.5</u>	78.8 <u>63.4</u>	The most frequent contributing sources were motor vehicles on Elm, with noise peaks in low 60s dB. But contributions from the 3 noted aircraft take-offs, all with noise peaks over 70 dB, were substantial. Data entries to the left show levels with all noise sources included and <u>with the aircraft increments removed</u> .
Angus Avenue, north side, in front of #397 residence (as measured 12/10/19 7:55-8:25)	52.4	54.0	60.3	62.5	77.0	Measurement period spans morning arrival of students. Arrivals by car begin just after 8 AM and continue for about half an hour; no school buses. Aircraft activity limited to one private jet departure from SFO, which did not produce the tabulated L _{max} .
The unit of measurement for table entries is the decibel (dB) , the standard measure of a sound's loudness relative to the human threshold of perception. Decibels are said to be A-weighted (dBA) when corrections are made to a sound's frequency components during a measurement to reflect the known, varying sensitivity of the human ear to different frequencies. The Equivalent Sound Level (L_{eq}) is a constant sound level that carries the same sound energy as the actual time-varying sound over the measurement period. Statistical Sound Levels - L_{min}, L₉₀, L₁₀ and L_{max} - are the minimum sound level, the sound level exceeded 90% of the time, the sound level exceeded 10% of the time and the maximum sound level, respectively; as recorded during 30-minute measurement periods.						

Additional noise monitoring was conducted to document noise levels experienced by existing residents facing the school along Angus Avenue from student/staff arrival on school day mornings, as shown by graph/data entries in Table NOI-2. It was observed before any school arrival activity was obvious (i.e., before 8 AM) that traffic volumes on Angus Avenue were very low with individual car activity unimpeded and through traffic moving at or above the local speed limit. Drop-off activity began to be noticeable after 8 AM with individual cars pulling over to the (vacant) south side curb to drop-off students. But even at full intensity, there were never more than a few cars at a time parked momentarily at the curb, and drop-off traffic never interfered with through traffic on Angus Avenue. The increased traffic volumes during the morning arrival period were enough to

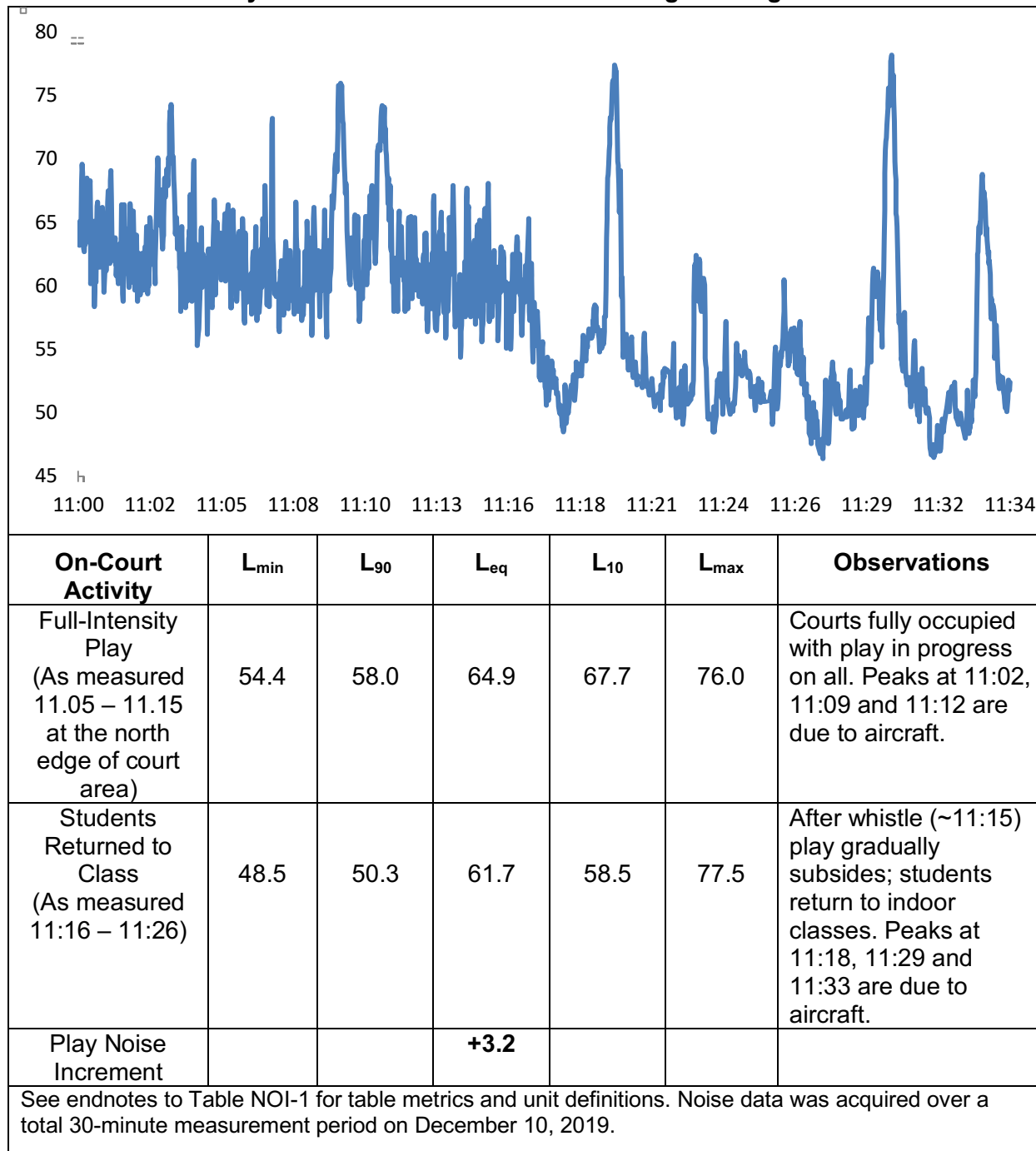
raise the existing school-day average noise level along Angus Avenue by about 2.5 dBA.

Table NOI-2: Student Morning Arrival on Angus Avenue



Additional noise monitoring was conducted to document noise levels experienced at the Project site boundary (northeast corner) by outdoor student play during recess periods, as shown by graph/data entries in Table NOI-3. When monitoring began, free-style play was in progress by about 20 students. Play ended after about 15 minutes and the students returned to class. Play activity raised the average noise level by about 3.2 dBA.

Table NOI-3: Play on Outdoor Hardcourt Areas during Morning Recess Period



Regulatory Setting

San Bruno General Plan (2009)

Chapter 7 *Health and Safety* of the General Plan defines the following noise-related policies:

- **Guiding Policy HS-F.** *“Protect the health and comfort of residents by reducing the impact of noise from automotive vehicles, San Francisco International Airport, railroad lines, and stationary sources.”*
 - **Implementing Policy HS-34.** *“Discourage noise sensitive uses such as hospitals, schools, and rest homes from locating in areas with high noise levels. Conversely, discourage new uses likely to produce high levels of noise from locating in areas where noise sensitive uses would be impacted.”*
 - **Implementing Policy HS-35.** *“Require developers to comply with relevant noise insulation standards contained in Title 24 of the California Code of Regulations (Part 2, Appendix Chapter 12A).”*
 - **Implementing Policy HS-38.** Require developers to mitigate noise exposure to sensitive receptors from construction activities. Mitigation may include a combination of techniques that reduce noise generated at the source, increase the noise insulation at the receptor, or increase the noise attenuation rate as noise travels from the source to the receptor.

The General Plan sets noise standards (see Chapter 7.5 Noise, Table 7-2. *Land Use Compatibility for Community Noise Environments*) that apply to areas outside of SFO’s noise-impacted areas (i.e., outside the 60 dB or greater airport noise contours; see *San Bruno General Plan*, Chapter 7.5 Noise, Figure 7.5 *Existing and Projected Noise Contours*). For areas within the airport noise contours, San Mateo County land use compatibility noise standards apply.

The **General Plan noise standards** use the L_{dn} metric⁴ and define the following standards for residential uses and schools (both the predominant land uses on and proximate to the Project site):

- **Normally Acceptable:** *“Specified land use is satisfactory ... without any special noise insulation requirements.”*
 - Residential (Single Family) – less than or equal to 60 dB L_{dn}
 - Schools – less than or equal to 70 dB L_{dn}
- **Conditionally Acceptable:** *“New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design.”*
 - Residential (Single Family) – between 55 dB - 60 dB L_{dn} , a more detailed analysis specifying additional mitigation is optional (at the discretion of the City), above 60 dB L_{dn} , it is required.
 - Schools - between 60- 70 dB L_{dn} , a more detailed analysis specifying

⁴ L_{dn} , the Day-Night Average Noise Level, is a 24-hour average sound level (L_{eq}) with a 10-decibel “penalty” added to sound levels occurring at night between 10:00 p.m. and 7:00 a.m.

additional mitigation is optional (at the discretion of the City), above 70 dB L_{dn}, it is required.

San Bruno Municipal Code

According to Title 6 of the Code, Section 6.16.070 *Construction of buildings and projects*:

“No person shall, within any residential zone, or within a radius of five hundred feet therefrom, operate equipment or perform any outside construction or repair work ... which shall exceed, between the hours of seven a.m. and ten p.m., a noise level of eighty-five decibels as measured at one hundred feet, or exceed between the hours of ten p.m. and seven a.m. a noise level of sixty decibels as measured at one hundred feet, unless such person shall have first obtained a permit therefor from the director of public works.”

San Mateo County Airport Land Use Commission

The San Mateo County Airport Land Use Commission (ALUC) develops and implements the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (CLUP, 2012). The northeastern corner of San Bruno is within SFO's 65 dB and 70 dB CNEL⁵ noise contours and the CLUP noise/land use compatibility standards apply to the areas of the City within these noise contours (as shown in the San Bruno General Plan's *Table 7-1: San Mateo County Comprehensive Airport Land Use Plan Noise/Land Use Compatibility Standards*). Residential uses (i.e., single- and multi-family, mobile homes), schools, libraries, churches, hospitals, nursing homes and auditoriums, are deemed “Compatible” with airport noise exposures less than 65 dB CNEL “*with no special noise insulation requirements for new construction.*”

Federal Transit Administration

There are no standards in the *San Bruno General Plan* for avoiding/reducing annoyance or structural damage from vibration impacts. It is most common for government agencies to rely on assessment methodologies, impact standards and vibration-reduction strategies developed by the Federal Transit Administration (FTA) in *Transit Noise and Vibration Impact Assessment* (May 2006). According to the FTA, limiting vibration levels to 94 VdB or less would avoid structural damage to wood and masonry buildings (which are typical of most residential, commercial and governmental uses), while limiting vibration levels to 80 VdB or less at residential

⁵ CNEL, the Community Noise Equivalent Level, is a 24-hour average sound level similar to L_{dn}, but with an additional 5-decibel “penalty” added to sound levels occurring in the evening between 7:00 p.m. and 10:00 p.m.

locations or 83 VdB or less at “institutional land uses with primarily daytime use” would avoid significant annoyance to the occupants.

The FTA also has standards for incremental traffic noise impacts, for which there is no counterpart in the San Bruno General Plan. Such FTA standards are shown in Table NOI-4.

Table NOI-4: Federal Transit Administration Incremental Traffic Noise Impact Criteria (dBA)

Residential and other buildings where people normally sleep ¹		Institutional land uses with primarily daytime and evening uses ²	
Existing L _{dn}	Allowable Noise Increment	Existing Peak Hour L _{eq}	Allowable Noise Increment
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3

Notes:

¹ This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.

² This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

Source: Federal Transit Administration, *Transit Noise Impact and Vibration Assessment*, May 2006.

Discussion

- a) Potentially disturbing noise increments associated with development can occur temporarily during project construction and/or permanently after construction if the project would introduce new, substantial noise sources to the site or in its vicinity.

Construction Impacts

Noise from On-site Construction Equipment/Activity. The Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) was used to estimate the noise levels at various distances from the locus of construction work produced by typical working groups of Project construction equipment during the Project’s most noise-intensive construction phases: 1) construction of the new school, with a working group consisting of a dump truck, backhoe and crane; and 2) old school demolition/playfield construction, with a working group consisting of a dump truck, excavator and

front-end loader. RCNM predicts somewhat higher average noise levels during demolition/playfield construction than during school construction, as can be seen from the results displayed **Table NOI-5**

Table NOI-5: RCNM Modeled Project Construction Noise Levels

Distance from Area of Construction Activity (feet)	Average Construction Daytime Noise Level L_{eq} (dBA)	Maximum Construction Daytime Noise Level L_{max} (dBA)
During New School Construction		
25	84	87
50	78	81
100	72	75
200	66	69
During Old School Demolition/Playfield Grading		
25	86	87
50	80	81
100	74	75
200	68	69

RCNM modeling shows that noise from Project construction would be within the residential area daytime limits set by the San Bruno Municipal Code (i.e., less than 85 dB at 100 feet from the construction source). However, the closest existing residential uses come within 100 feet or closer to the Project site. Thus, when construction work is in progress along the site edges, average construction noise levels at the facing residential could, at times, reach the mid-70s dB, which exceeds the existing daytime levels measured during the site survey (i.e., ranging about 55 - 65 dB). This construction noise level is high enough to be occasionally disruptive to leisure activities and relaxed conversation in the outdoor spaces facing the Project site, but not high enough to be similarly disruptive to residents while indoors with the windows closed. Nevertheless, all feasible measures shall be taken by the Project contractor to assure that noise emissions from on-site construction activity are reduced to the maximum extent by implementing Mitigation Measure NOI-1. In addition, working hours shall be further reduced from the minimum requirements of the San Bruno Noise Ordinance, as specified in Mitigation Measure NOI-2. With their implementation, the construction noise produced onsite would have **less-than-significant** impacts to off-site residential receptors.

Although current plans call for scheduling the Project construction phases with the highest noise-generating potential (i.e., new school building erection, and old school demolition/playfield grading) to begin in the summer months of 2021 and 2022 when no school activity occurs onsite, there may be other times when Project construction activity would need to occur near on-site noise-sensitive receptors (i.e., classrooms, school offices, library, etc.) during school hours. Noise impacts to on-site receptors shall be avoided by implementing Mitigation Measure NOI-3. With its implementation, the construction noise produced onsite would have **less-than-significant** impacts to on-site noise-sensitive receptors.

Noise from Construction Supply Delivery and Debris Off-Haul Trucks: Delivery of construction materials by heavy trucks will be required over the entire year-and-a-half period of Project construction. And in summer 2022, demolition of the old school will require off-haul of about 340 truck-loads of debris over a period of about 3 weeks, and grading of the new play fields will require off-haul of about 1000 truck-loads of soil over period of about 2 months. Noise impacts to off-site residential receptors along the low-volume, locals streets of the surrounding neighborhood shall be avoided by implementing Mitigation Measure NOI-4. With its implementation, construction truck noise would have **less-than-significant** impacts to residential and other noise-sensitive receptors along the Project site access routes.

Operational Impacts

Noise from Additional School-Related Traffic. Allen Elementary School currently has a capacity for 410 students. With expansion as specified in the Project Description, it would have a capacity for 500 students. According to the Project traffic study, motor vehicle AM/PM peak hour traffic volumes would about double on Angus Avenue and increase by lesser amounts on the other local streets surrounding the Project site. According to FTA traffic noise modeling methodology, daily average traffic noise levels (i.e., L_{dn}) would increase by about 1 dBA along Angus Avenue, by about 0.4 dBA along Elm Avenue, and by lesser amounts along the other local streets surrounding the Project site. The FTA defines a 2 dB significance criteria for traffic noise increases for residential receptors currently exposed to noise levels at or below 60 dB L_{dn} (see Table NOI-4 above). Thus, Project-related motor vehicle noise levels along the Project site access roads would increase, but not significantly under FTA criteria. Thus, traffic noise increases would have **less-than-significant** impacts to residential and other noise-sensitive receptors along the local streets surrounding the Project site.

Noise from Additional Morning/Afternoon Student Drop-off/Pickup Activity.

Noise monitoring conducted to document noise levels during of morning school-related motor vehicle arrivals found that the average noise level along the residential frontage of Angus Avenue was raised by about 2.5 dB during the arrival period (which lasted about 20-30 minutes). Although the number of students at the larger new elementary school would increase the number of arrivals/departures by motor vehicles, current Project plans call for provision of an on-site arrival drop-off/departure pick-up area just off Angus Avenue. This would move the locus of arrival/departure noise generation farther from the existing residents on the north side of Angus Avenue likely decreasing the noise intensity reaching them from the arrival/departure area. Thus, the student arrival/pick-up motor vehicle noise level increment would not increase with Project implementation, a **less-than-significant** impact.

Noise from Student Outdoor Play Activities. Noise monitoring conducted to document noise levels during a mid-morning outdoor play period found that the average noise level along the school site boundary near the hard-court areas was raised by about 3.2 dB during play. Project plans call for a relocation of outdoor play areas from their current locations on southeast areas of the site to new locations on the northwest areas of the site. There would be no substantial changes in their total area, their basic function for recreational use, nor of their times of use during a school day. No lighting for night use would be added, nor would a public address system be added for use at organized athletic activities. Thus, overall noise from the relocated playfields would not increase with Project implementation, a **less-than-significant** impact.

- b) The most vibration-intensive piece of construction equipment is a pile driver, which can introduce a substantial potential for annoyance at sensitive receptors within 1000 feet; other types of construction equipment are far less vibration-intensive. Yet all construction equipment has the potential for causing annoyance and/or structural damage if the construction activity is too close to vibration-sensitive receptors. But the areas of the Allen Elementary School campus marked for the most intense construction/demolition/grading activity are all on northern areas of the Project site and the residences there are buffered by local streets (about 100 feet separation from work areas). According to FTA vibration screening methodology, this would be outside the range where there would be a substantial potential for on-going annoyance or structural damage from Project construction vibration. Thus, the Project's construction vibration impact severity on off-site residential receptors would be **less than significant**.

- c) The Project site is less than a mile west of San Francisco International Airport (SFO). One of SFO's main aircraft departure routes follows the northwest-southeast orientation of two of its four main runways and departing flights regularly and often overfly the northeastern parts of San Bruno. But the Project site is about half a mile south of this "line of departure" and about a quarter mile south of SFO's 65 dBA CNEL contour, as shown in the portion of the CLUP map included here as Figure NOI-1. While flights on low-level departures from SFO do not overfly the Project site, they do come close. During mid-morning and early afternoon periods of the site survey, many departures of large commercial jets were observed averaging one every five to ten minutes. Even with this observed frequency of aircraft departures and their proximity to the Project site, daily average aircraft noise levels on the Project site are just below 60 dB CNEL, as shown in the San Bruno General Plan map included here as Figure NOI-2. Short-term noise measurements taken during the Project site survey indicate that mid-day average noise levels in the mid-60s dB are common along local streets, and that are peak noise intrusions from aircraft in the mid- to upper-70s dB are a common occurrence on and around the Project site.

Thus, noise exposure data in the San Bruno General Plan and Project-specific noise measurements indicate, at best, that current on-site noise levels are at the upper end of the General Plan's "Normally Acceptable" range. Due to the high natural variability of environmental noise levels (i.e., higher noise levels than those measured during the site survey probably occur on occasion) and the likelihood that future noise in downtown San Bruno will grow, noise levels on/around the Project site cannot be confidently expected to remain in the Normally Acceptable range. Project plans should accommodate the probability of higher future noise exposure.

The World Health Organization (WHO, *Guidelines for Community Noise*, 1999) recommends a school-day average of 35 dB L_{eq} for school classroom/library space to reduce student/faculty/staff annoyance from external noise sources, increase speech intelligibility, and facilitate information acquisition. Without adequate acoustical insulation, the new school/library buildings would not attain the interior noise exposure standard necessary for users to fully avail themselves of the new school's resources. But with implementation of Mitigation Measure NOI-5, the Project's interior noise levels would be reduced and the impact from noise intrusions would be **less than significant**.

Figure NOI-1: Map of San Bruno and Environs Showing SFO Aircraft Noise Contours (CNEL) (*Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport – Exhibit IV-6*)

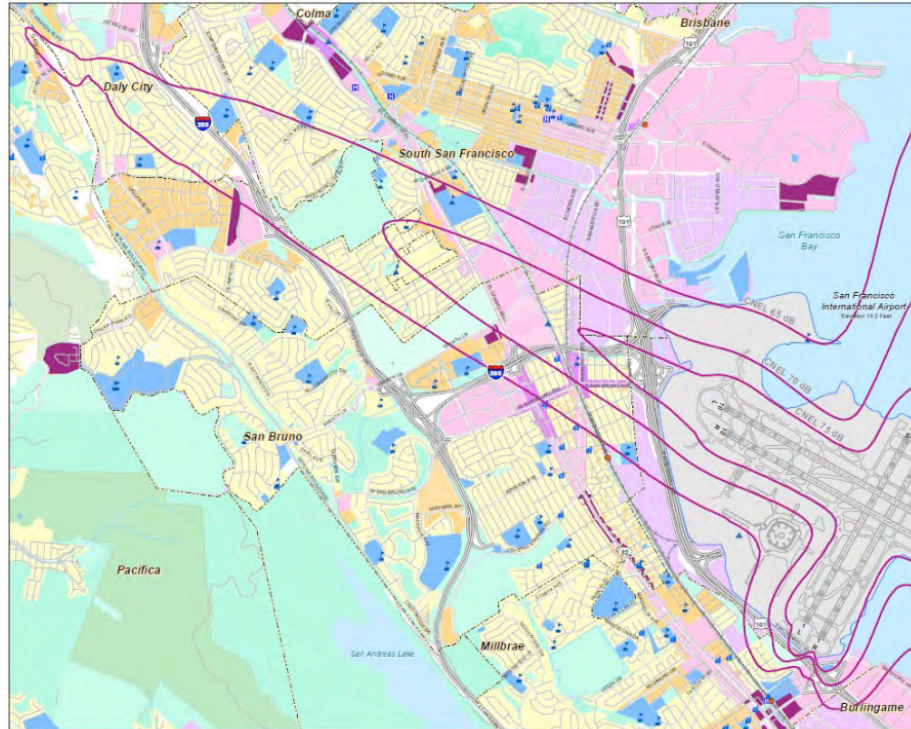
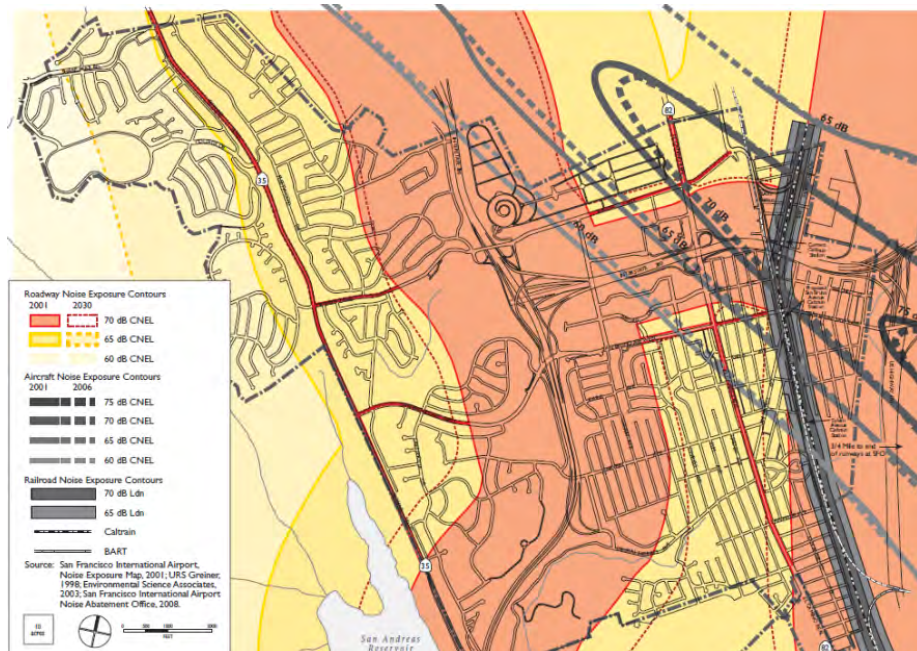


Figure NOI-2: Map of San Bruno Showing SFO Aircraft Noise Contours (CNEL) (*San Bruno General Plan, Section 7.5 Noise, Figure 7.5*)



Mitigation Measures

Mitigation Measure NOI-1: The following noise-control Best Management Practices shall be incorporated into the construction documents to be implemented by the Project contractor:

- Provide enclosures and noise mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy activity areas on the site.
- Use quietest type of construction equipment whenever possible, particularly air compressors.
- Provide sound-control devices on equipment no less effective than those provided by the manufacturer.
- Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors.
- Prohibit unnecessary idling of internal combustion engines.
- Designate a noise disturbance coordinator at the San Bruno Park School District who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance coordinator shall be conspicuously posted at the construction site. Copies of the project purpose, description and construction schedule shall also be distributed to the surrounding residences.

Mitigation Measure NOI-2: Further restrictions shall be placed on hours of Project construction activity than those allowed under the Municipal Code. Thus, construction activity shall be limited to weekdays between 7 AM and 6 PM, and prohibited on weekends and all holidays observed in the City of San Bruno.

Mitigation Measure NOI-3: If at any times when school is in session that construction equipment needs to operate near on-site noise-sensitive school receptors (i.e., classrooms, staff offices, the library), the Project contractor shall consult with the school principal/faculty/staff to arrange for a temporary relocation of the said receptors to minimize disruption to educational activities while the work is completed.

Mitigation Measure NOI-4: All heavy trucks delivering building supplies or off-hauling excavated soil or demolition debris shall exit the site to Linden Avenue and proceed directly to El Camino Real and on to area freeways, thereby avoiding residential areas facing Elm Avenue, Angus Avenue and any other neighborhood local streets.

Mitigation Measure NOI-5. To assure that average interior noise levels within the new school's class rooms and library achieve the WHO-recommended indoor noise exposure standard of 35 dBA Leq during its operating hours, the new Project structure shall have sound-rated walls, windows and exterior doors adequate to achieve WHO noise standards. This shall be verified by a Project building-specific acoustical analysis by its engineers/architects during the final Project design phase. The results of the analysis, including the description of the necessary noise control features to attain the standard, will be submitted to the City along with the final building plans and approved prior to issuance of a building permit.

XIII. Population and Housing

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
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)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

Discussion

- a) The proposed project would not directly increase population growth because there is no housing component, and would not indirectly increase housing (through increased demand) because the Project would not, in itself, generate any new demand for housing. No new permanent jobs would be generated by the project – all of the staff are currently employed by the District, and would be relocated into this building from existing District facilities (mostly from the existing on-site school). The site and surrounding areas have been or are developed with urban land uses and no extensions of roads or other infrastructure would be required that would indirectly induce growth. Therefore, the project would not induce new development on nearby lands, and **no impact** would occur.
- b) The Project site is an existing elementary school campus with no housing. The proposed project would not displace existing housing or people, so there would be **no impact**.

XIV. Public Services

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

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Fire protection?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X

Discussion

- a) The City of San Bruno Fire Department (SBFD) provides fire protection and emergency medical services for the Project site. The SBFD maintains two strategically located and professionally staffed fire stations. The Department staffs two fire engines and one ladder truck 24 hours a day, 365 days a year. The Department responds to approximately 3900 calls for service annually. The SBFD station nearest to the school is directly across Linden Street from the project site, at 555 El Camino Real.

Implementation of the project would replace an older set of school buildings with modern buildings with state-of-the-art fire protection infrastructure, result in a slightly decreased demand for fire protection services. In addition, the project is located on a site in a highly developed area already served by the Fire Department. The new school would be a replacement of the existing school on the site (with the addition of relocated kindergarten and pre-school students), so net Fire Department protection demand would not increase. The project would not require the provision of or need for new or physically altered facilities to continue to serve the project site. As a result, the project would not result in a substantial adverse physical impact nor would it substantially affect response times for fire services. The project's impact related to the provision of fire services would be **less than significant**.

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- b) The City of San Bruno Police Department (SBPD) provides police protection services for the Project site. The Department has 50 sworn officers and over 60 employees. The Department provides a wide range of law enforcement services to the community and responds to over 32,000 calls for service each year. The SBPD currently provides police protection to the existing Allen School and would continue to provide service when the new campus is constructed. The Project plans would be reviewed by the SBPD for safety provisions. Full emergency access to the site would be provided. Because there would be minimal new demand for police protection services, the impact would be **less than significant**.
- c) The proposed facilities would not increase the population or otherwise increase demands for school services. Therefore, the Project would have **no impact** on schools.
- d) As described above, the proposed Project would not result in an increase in residents and therefore, would not increase demand for any parks facilities. For this reason, the project would be expected to have **no impact** on recreational facilities
- e) No other public facilities would be required by the proposed Project. Therefore, there would be **no impact** to other facilities.

XV. Recreation

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would occur or be accelerated?				X
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?				X

Discussion

- a) As described in response to question d) under Public Services, above, the Project would have **no impact** on parks and other recreational facilities such that physical deterioration of the facility would occur or be accelerated.
- b) The project would include play fields accessible to the public when school is not in session, replacing existing on-site recreation facilities. Therefore, **no impact** would occur.

XVII. Transportation

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	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?				X
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?				X
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?				X
d) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?			X	

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?				X
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Background

A transportation study was prepared for the project by PHA Transportation Consultants (PHA January 2020). This study is available for review at the School District offices. The study scope, designed to identify the potential project impact on area traffic circulation, was reviewed, refined, and approved by City of San Bruno staff. The main objective of the study is to identify the potential impact associated with the proposed “Replacement School Project”, and develop necessary mitigation measures should significant impacts are identified. Specifically, the study focuses on the analysis of the following critical areas of concern:

1. Evaluates “Project” traffic impact in terms of traffic operations/Level-of-Service (LOS) for critical streets and intersections that provide access and circulation to the school and in the study area
2. Identify parking saturation and available spaces near the school that can accommodate parent drop-off and pickup during the school peak times.
3. Review study area traffic collisions to identify collision hotspots and traffic safety issues.
4. Evaluate truck traffic and construction crew traffic during construction periods to identify impact on study area intersections.

Study street intersections and segments included:

Study Intersections Included for Traffic LOS and Construction Impact

1. Angus Avenue/Elm Avenue
2. Angus Avenue Avenue/Linden Avenue
3. Jenevein Avenue/Elm Avenue
4. Jenevein Avenue/Linden Avenue
5. El Camino Real/Jenevein Avenue
6. New staff parking lot access/Linden Avenue (for project conditions)

Study Street Segments Included for Parking and Traffic Safety Analysis

1. West Angus Avenue
2. Elm Avenue
3. Linden Avenue
4. Reid Avenue

Discussion

- a, b, d) The school is located in a residential area. Access to and from the school would be via the existing West Angus, Elm, and Linden Avenues. The proposed replacement school would increase current capacity from about 400 to 500 students. Based on a worst-case scenario projection estimated from parent transportation survey response that over 90 percent of students will be driven to school, the added 100 students could add about 198 and 148 one-way morning and afternoon trips respectively. However, based on the industry-standard rate for elementary school, the added students would add about 50 and 38 one-way trips during morning and afternoon peak hours respectively. (PHA 2020)

With the worst-case high trip generation estimates, the PHA Transportation Study evaluated traffic operational Level-of-Service (LOS) at five street intersections that control traffic flows to and from the school to identify the potential traffic impact of the added students and also traffic associated with the construction of the new school. Results indicated that all study intersections currently operated at good LOS (LOS A and C). With the added school traffic and construction traffic, all of the study intersections would continue to operate at the same LOS, and no insignificant impacts are identified.

The proposed replacement school would not change or affect current traffic operation and circulation in the area in any noticeable way and would not result in any conflicts with any established plan or policies.

There were 18 reported traffic collisions near the study area over the past three years (2016-2018) but none occurred near the school. The two key street intersections West Angus Avenue at Elm and Linden Avenues next to the school campus are controlled by all-way-stop signs with high visibility pedestrian crosswalks. School staff supervise and assist students crossing during drop-off and pick-up periods. The project would not change any street traffic patterns or have any conflict with any established transportation, circulation or safety plans for the area. As such, project traffic and safety impact would be **less than significant**.

- c) San Francisco International Airport is located approximately 0.75 miles east of the Project site. However, the proposed one- and two-story buildings of the Project would not extend into the protected air space and would not create aviation safety hazards for persons residing or working in the Project vicinity.

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The Project would replace an existing elementary school facility on the site, and would not alter air traffic hazards. Therefore, it would have **no impact** on air traffic patterns.

- e) The project would not change any existing street or roadway design features and would have an improved internal drop-off and pickup lane (zone) on West Angus Avenue. The school would notify all parents to drop off their children at this drop-off area. This would improve student safety during drop-off and pickup times. As such, there would be adequate emergency access. Therefore, the Project would include adequate emergency access to the site and surrounding area and the project's impact would be **less than significant**.
- f) The Project would have no effect on existing bus, bicycle and pedestrian access, therefore it would not conflict with any adopted plans, policies, or programs that address alternative transportation, and there would be **no impact**.

XVIII. Tribal Cultural Resources

Would the project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Would the project cause a significant adverse change in the significance of a tribal cultural resource defined in Public Resource Code Section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:			X	
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

Background

Solano Archaeological Services (SAS) has prepared a technical memorandum summarizing the background research, Native American community outreach, and findings for the project. This included consultation with local Native American representatives regarding Tribal Cultural Resources. A cultural resources assessment of the site identified no known cultural resources on the site. (See Cultural Resources discussion for a summary of that study.)

California Public Resources Code Sections 21080.1, 21080.3.1, and 21080.3.2 (AB 52) requires public agencies to consult with the appropriate California Native American tribes identified by the NAHC for the purpose of mitigating impacts to cultural resources.

On December 5, 2019, SAS emailed a letter and a map depicting the project area and surrounding vicinity to the Native American Heritage Commission (NAHC). On behalf of the San Bruno Park School District, the letter requested a Sacred Lands File (SLF) search of the project area, facilitation of AB 52 consultation, and a list of Native American consultants who should be contacted about the proposed Project. On December 10, 2019, Ms. Nancy Gonzalez- Lopez, Staff Services Analyst for the NAHC, replied in an emailed letter that the SLF search was completed with negative results. Ms. Gonzalez-Lopez also supplied a list of local Native Americans to inform about the Project, request information on unrecorded cultural resources that may exist in the project area, and gather official Project recommendations. On December 17, 2019, SAS mailed letters to the following Native Americans identified by the NAHC:

- Irenne Zwierlein, Chair – Amah Mutsun Tribal Band of Mission San Juan Bautista
- Ann Marie Sayers, Chair – Indian Canyon Mutsun Band of Costanoan
- Andrew Galvan, Chair – The Ohlone Indian Tribe
- Tony Cerda, Chair – Costanoan Rumsen Carmel Tribe
- Monica Arellano, Chair – Muwekma Ohlone Tribe of the San Francisco Bay Area.

On December 26, 2019, and January 2, 2020, SAS contacted the above tribal contacts via email to gather their input about the Project. To date, no responses have been received.

Discussion

- a) i., ii. As described above, SAS contacted the above tribal contacts via letters and emails to gather their input about the Project and, to date, no responses have been received. If any substantive information or inquiries are received from other tribal representatives, that information will be added to the Final Initial Study.

XVII. Utilities and Service Systems

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water 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?			X	
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			X	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?				X

Background

The City of San Bruno provides wastewater collection, treatment, and disposal services for the project area. The Wastewater Division of the Public Works Department is responsible for the wastewater collection system throughout the

City including all sewer mains, manholes, lower laterals, and 6 lift stations. Wastewater treatment is handled under a Joint Powers Agreement with the City of South San Francisco. Approximately 3.4 million gallons of effluent per day are pumped from San Bruno through the Shaw Road Pump Station to be treated at the South San Francisco/San Bruno Water Quality Control Plant. The treatment plant, which is located on Belle Air Road in the City of South San Francisco, just north of the San Francisco International Airport, is operated and maintained by the City of South San Francisco. Treated wastewater is discharged two miles out into San Francisco Bay via a join outfall pipe shared by the cities of San Bruno, South San Francisco, Millbrae, Burlingame, Colma, and the San Francisco Airport.

The Water Division of the San Bruno Public Works Department is responsible for the efficient and effective operation and maintenance of the water supply and distribution systems. The San Bruno water supply system consists of 5 production wells, 13 pressure zones, 8 storage tanks located at 6 sites, and 5 connections to major transmission pipelines, 4 owned and operated by the San Francisco Public Utility Commission (SFPUC) and one by the North Coast County Water District (NCCWD). The San Bruno water distribution system consists of 100 miles of pipelines, 9,000 valves, 985 fire hydrants, 8 pumping stations, 8 storage tanks and 13 pressure zones. Total City water demand in Fiscal Year 2017-18 was approximately 3 million gallons/day, the vast majority of which was SFPUC water, with the remainder sourced from NCCWD.

The City of San Bruno has partnered with Recology San Bruno to provide compost, recycling, and landfill collection and disposal services to residential and commercial customers. Recology operates a solid waste transfer station at 101 Tanforan Avenue in San Bruno.

Discussion

- a, b, c) The project would generate wastewater that would be treated by the regional wastewater treatment plant. However, the project wastewater generation from the new school would be reduced compared to the existing school and preschool, (from 428 fixture units to 359 fixture units⁶) so there would be no substantive net increased wastewater treatment demand. The school would be required to pay a new development sewer connection fee, provide the fee structure for the installation and connection of sanitary sewers, and regulate the discharge of waters and wastes into the public sewer systems. A detailed wastewater infrastructure analysis prepared by Woodward and Curran (December 2, 2020) found that no off-site sanitary sewer infrastructure

⁶ Fixture-unit calculations provided by Greystone West, April 13, 2020.

improvements were required by the project. As a result, the project would have a **less-than-significant** impact related to wastewater treatment facilities.

Similarly, Project water use has been calculated based on fixture-units, and would be less than the existing school demand (reduced from 233 to 206 fixture-units), resulting in **no impact** in water demand. A detailed water supply infrastructure assessment prepared by West Yost Engineers (November 13, 2020) found that no off-site infrastructure improvements were required for project domestic or fire-flow water supply.

The project area is developed, and no substantial expansions or extensions of utility services would be required.

- d, e) Recology San Bruno would continue to provide recycling, organics (green waste), and garbage collection services to the school. Because the Project would replace the existing school on the site, there would be no net increase in solid waste generation as a result of project operation. Demolition of the existing school on the site would generate landfill disposal and recycling demand for the demolition materials. Approximately 125 truckloads of demolition debris (about 25,000 cubic yards) are expected to be removed and disposed of at an appropriate Class II landfill to be selected by the disposal contractor. In addition, approximately 12,000 cubic yards of excavated earth material would be hauled off of the site; this material would likely be used either as landfill cover or as fill for other construction projects. and there would be a **less-than-significant impact** on solid waste.

XX. Wildfire Hazards

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				X

Discussion

a, b, c) The project site is adjacent to developed urban uses and the nearest wildfire-hazard areas are several miles west of the site, in the Santa Cruz Mountains, and several miles to the north, on San Bruno Mountain. Therefore, the project would have **no impact** with respect to wildfire hazards, associated hazards, and equipment /infrastructure needs.

IV. MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issue	Potentially Significant	Less than Significant with Mitigation	Less Than Significant	No Impact
a) Does the Project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory?	X			
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)?			X	
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

- a) As described in the Biological Resources section of this IS, potentially significant impacts to biological resource impacts (nesting birds) would be mitigated to a less-than-significant level by measures included in that section. The school has been determined to be eligible for the National Register of Historic Places. Therefore, its demolition would constitute a **significant unmitigable impact**.
- b) A major development project, Mills Park Center, at the southwest corner of El Camino Real and San Bruno Avenue West, about three blocks north of

the project site, has been proposed but was not approved. The current project design calls for four separate 6 and 7 story buildings with a total of approximately 600 residential units, plus up to parking spaces. As of October 2019, no formal proposal has been re-submitted to the City⁷.

Because the project would replace the existing school with only slightly expanded facilities, it would not contribute in a cumulatively considerable manner to any impacts of the Mills Park Center project. Although all project construction impacts would be limited to the project site and immediately surrounding streets, there may be minor overlaps of construction air pollution and noise. In addition, if the two projects are constructed concurrently, there could be some overlap in construction traffic, which would require coordination by the City. However, construction traffic for the proposed project would be minimal. Similarly, most long-term impacts would not overlap, however Mills Park project traffic could affect some of the roadways used by parents accessing the school in the future. The project does not propose any expanded utilities usage compared to the existing school, so no cumulative impacts to utilities would occur. Therefore, the proposed project would not contribute in a cumulatively considerable manner to any impacts associated with the Mills Park Project, and this impact would be **less than significant**.

- c) The proposed project would not increase long-term air pollutant emissions and greenhouse gasses because it would not add any net new workers – project workers are currently working at District schools on the site or nearby. However, construction air pollutant emissions would be potentially significant but mitigation measures for emissions from construction would reduce any such emissions to less than significant levels. The projects noise impacts also would be less than significant. The Project's hazards to human health and safety would be less than significant, as described in Section VIII of this Initial Study. The overall impact to human health would be reduced to a **less-than-significant level** with mitigation measures identified in this document.

⁷ <https://www.sanbruno.ca.gov/civicax/filebank/blobdload.aspx?BlobID=31231>

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VI. REPORT PREPARERS

Grassetti Environmental Consulting

Richard Grassetti, Principal

Geoffrey Hornek, Air Quality, GHG, and
Noise Specialist

Jason Coleman, Solano Archaeological Services, Cultural and
Tribal Resources

William Kostura, Architectural Historian

Richard Denney, Graphics

Greystone West Company

Todd Lee, Principal

C. Historic Resources Evaluation

**HISTORIC RESOURCE EVALUATION
to California Register criteria, for
DECIMA M. ALLEN SCHOOL
875 ANGUS AVENUE WEST, SAN BRUNO**



The north facade of Unit 1 of the school: current photograph and 1941 elevation drawing

by

William Kostura, architectural historian
P. O. Box 60211
Palo Alto, CA 94306
(650) 815-1174

March 2020

Summary

Decima M. Allen School is a complex consisting of seven buildings plus covered walks, landscaping, and playgrounds. The buildings were built in 1941, 1945-1946, and 1956 to designs by the San Francisco architects Masten and Hurd (in association with architect James H. Mitchell in 1945). The major alteration that has occurred is the replacement of wooden window sash with aluminum sash in the longest building (Unit 1) in 1999-2000.

Allen School is characterized by long, narrow one-story buildings whose massing steps down the hillside, and whose interiors are illuminated by long bands of windows that give the complex its International style of architecture. All of the buildings except one are connected by covered walks, or breezeways, whose roofs are supported by steel poles. This type of school design became extremely common in northern California in the 1950s, as well as across the United States. The oldest part of Allen School, namely the two more northern classroom buildings, were built in 1941, and is one of the two earliest known schools of this type in northern California.

The firm of Masten and Hurd was one of the earliest practitioners of the International style in northern California, and Allen School is one of the two earliest works in this style by these architects.

Because Allen School was one of the first examples of a modern school design that became extremely common, and because of the importance of Masten and Hurd as designers in the International style, this property appears to be eligible for the California Register of Historical Resources at the regional level under Criterion 3, for its design. The Periods of Significance are the design and construction dates, 1941, 1945-1946, and 1953.

Description

Setting and site plan

This school property is bounded by Angus Avenue West on the north, Elm Avenue on the west, Linden Avenue on the east, and private properties to the south. The property is very roughly a square in shape, measuring an average of about 425 feet from east to west and 475 feet from north to south, comprising roughly four and one-half acres. The school buildings are concentrated toward the west side of this large lot, the rest of the area being devoted mainly to paved playgrounds. Suburban houses surround the property to the north, west and south, while the San Bruno Public Library is across Linden Avenue to the east. That library is roughly contemporary with Allen School. It was built in 1954 to designs by architect William Henry Rowe.

The school complex is composed of seven buildings, covered walks, and landscaping between the classroom buildings. Four of the buildings are classroom buildings that are oriented east-west and are closely parallel to each other. On original plans they are named Unit 1 (closest to Angus Avenue), Unit 2, Unit 3, and Unit 4. Units 1 and 2 were built in 1941 and are wood-framed in construction, while Units 3 and 4 were built in 1945-1946 and are reinforced concrete in construction. Despite the difference in building structure, all four buildings share a close resemblance in their style and exterior materials.

Three more buildings were designed in 1953 and built in 1956. These are the Administration Building, the Multi-purpose Building, and the Kindergarten (now the Media Center). Original plans for these three buildings are dated 1953, but in multiple sources the school district states they were built 1956.

The Administration Building was built at the west end of Unit 1 and looks like an addition to it, but for sake of convenience they are referred to here as separate buildings. The Multi-purpose Building and the Kindergarten were built at the south end of the property, apart from the other buildings.

Long covered walks, or breezeways, run along the south sides of units 2, 3, and 4. Another covered walk, most likely built in 1946, connects the four classroom buildings on their east sides. Finally, one more covered walk was built along the west side of the complex in 1956; it connects all of the buildings except for the Kindergarten/Media Center.

Please see a site plan and Sanborn map, below, that illustrate the layout of the buildings in this complex.

Descriptions of buildings

Unit 1, built in 1941, is the longest building in the complex. From east to west it stretches roughly 250 feet, and the depth from north to south is about 26 feet (i.e., one classroom). Because of the slope of the land the building steps down the hill in four stages. The siding is stucco and the roof is flat, with boxed overhanging eaves. On both the north and south sides, bands of windows are very wide and are divided by wooden mullions, with flat wooden trim and replacement aluminum sash. Doors on the south side open into an interior corridor or hallway that runs the length of this building. The short east end of this building is plain, with a recessed covered porch and entrance.

Unit 2 was also built in 1941. It is, very roughly, 130 feet long by 24 feet deep. As in Unit 1, the roof is flat, with boxed overhanging eaves, and the siding is stucco. On the north side windows are again in long bands that are divided by wooden mullions, as in Unit 1, but they retain their original wooden awning sash. Sets within these bands of windows are plain steel doors that open into classrooms. On the south side, the only

openings are plain steel doors set in the stucco wall. Here, the roof extends south to create a covered walk or breezeway with a paved floor. This extended roof is supported by steel poles. Aluminum pipe railings on both sides of the breezeway appear to be non-original.

Units 3 and 4 were built in 1945-1946. Although they are reinforced concrete in construction, instead of wood-framed, they are practically identical to Unit 2 in their form, materials, and plans. Again, they have flat roofs with boxed eaves, stucco siding, long bands of windows with original wooden sash on the north side, steel doors, and covered walks with wooden roofs supported by steel poles on the south side. Each of these two buildings is slightly longer than Unit 2.

One more feature was added to the campus in 1945-1946, namely a north-south covered walk, or breezeway, that connects the four wings along their east sides. Like the breezeways on the south sides of units 2, 3, and 4, it has a flat wooden roof and is supported by steel poles.

Three buildings and another breezeway were designed in 1953 and built in 1956. They are described below.

The Administration Building is adjacent to the west end of Unit 1. It is flat-roofed with an overhanging boxed wooden eave, and it is that aspect that relates most strongly to the other buildings described above. Most of the north side is devoted to an expansive band of windows set in original aluminum sash. (This sash is shown in the 1953 plans.) To the left of this window is a span of vertical wooden siding, and to its left is the main entrance to the building. The entrance is composed of an aluminum-framed door, sidelights, and transom, all of which appear to be non-original, most likely dating to 1999-2000. Jutting out from this building is a wooden wall devoted to signage. It reads "Decima M. Allen Elementary School," a change from the original name, which was "Edgemont School." The west side of the Administration Building is a plain wall of vertical wooden siding. The south wall has a mix of surface materials: an aluminum-framed rear entrance with windows; two patches of vertical wood siding, and larger areas of stucco. Original plans indicate stucco here, so these materials may be original.

The Multi-purpose Building is sited to the south, opposite the west end of Unit 4. Its most distinctive exterior feature is its bowed roof. The north and south walls, and part of the west wall, are clad in vertical wooden siding, and the rest of the building is clad in stucco. Steel sash windows separated by narrow piers can be found in the upper levels of the east and west sides. Original plans show that these materials and finishes are original. The interior features a bowed ceiling whose wooden planks and purlins rest upon bowed wooden beams. This ceiling is probably the most distinctive interior feature on the campus.

The Kindergarten (now the Media Center) is located south of the Multi-purpose Building. The roof is flat, with the usual extended boxed eaves, and siding is a mix of vertical wood siding, stucco, and concrete blocks. Bands of wooden windows are divided by wooden mullions. The primary entrance is on the south side, where a steel door is adjacent to wooden windows.

The breezeway of 1956 runs north to south along the west side of the campus. It begins close to the south wall of the Administration Building and extends to the Multi-purpose Building. It thus connects every building on the campus except for the Kindergarten. It is made of steel framing that was originally filled by plexiglass, since removed. The door and two adjacent panels are filled with steel mesh.

Courtyards fill the spaces between units 1 through 4. The courtyard between units 1 and 2 is mostly devoted to non-original concrete ramps with steel or aluminum railings. Small squares bounded by concrete curbs contain small trees and a few shrubs. The courtyards between units 2 and 3, and 3 and 4, feature concrete paths that step down the hill. Alongside these paths are planted areas of trees, shrubs, and other greenery.

For a campus of so many features a summary statement is probably useful. Units 1 through 4 strongly relate to each other because they have so many features in common: they step down the hillside, they are clad in stucco, they have flat roofs with extended boxed eaves, and they feature long bands of windows, although in the case of Unit 1 the original wood sash has been replaced with aluminum. Two of the 1956 buildings also have flat roofs with boxed eaves, while one, the Multi-purpose Building, has a bowed roof. All three of the 1956 buildings have varied cladding materials, in contrast to Units 1-4; although each features some stucco. One of the 1956 buildings, the Kindergarten, has bands of wooden windows (like units 1-4), while the other two have, variously, aluminum sash and steel sash.

Three of the buildings — units 2 through 4 — are flanked on their south sides by covered walks, and all buildings except the Kindergarten are connected by north-south covered walks.

To summarize, in their design and materials, more features unite these buildings than otherwise.

Regarding integrity, the two main alterations have been the replacement of original wooden sash with aluminum sash in Unit 1, in 1999-2000; and the apparent replacement of original entrance framing in the Administration Building, probably at the same time. Some of the landscaping in the courtyards is non-original as well. Addition of aluminum railings to the east-west breezeways is a minor alteration. Finally, the covered walk along the west side of the complex has seen the removal of its plexiglass glazing.

History

Schools in San Bruno

The first school in San Bruno was the San Bruno Park School, built in 1906 on the east side of El Camino Real, north of Kains Avenue. It was a small, wood-framed metal-clad building with a hipped roof and attached tower, and because of its exterior material it was popularly called the “Old Tin School House.” It only served as a school for four years, until the first Edgemont School was built, and then became a municipal building called Green Hall. It next served as the City Hall from 1914 until 1954, when a new City Hall and library were built. The old school/city hall no longer stands.

Edgemont Elementary School was built in 1910 at Elm, Acacia, and Jenevein avenues. This was a two-story, squarish wood-framed Mission Revival-style building with a central arcaded entrance and a stepped parapet. This building also held the school district’s administrative offices. It continued to serve as a school through 1941. When a new Edgemont School was built two blocks to the north, this building continued to serve as the school district’s administrative offices. It was demolished in 1956 when new administrative offices and classrooms were built on this site.

In 1912 the wood-framed Mission Revival-style North Brae Elementary School was built at Euclid and San Mateo avenues. The only other addition to San Bruno’s school district before the 1940s was an addition to Edgemont in the early 1930s.

San Bruno experienced a post-war building boom, and needed an expanded school system to meet that growth. The school district’s new building program actually began immediately before the United States entered World War II, in 1941, when the new Edgemont School was built. (For a history of this school, see “Decima M. Allen Elementary School,” below.) Another ten schools were built in San Bruno Park School District during 1948-1964. They were:

El Crystal Elementary School, 201 N. Balboa Way (1948). This was a complex of six small, squarish reinforced concrete buildings built in 1948. Five of them were lined up in a row and connected by a wooden breezeway or walk. Additional classrooms were built here in 1956-1957.

Belle Air Elementary School, 450 Third Avenue (1951). A small school in modern style.

Parkside Intermediate School, 1801 Niles Avenue (1954).

Rollingwood Elementary School, 2500 Cottonwood Drive (1956). This school was built to serve the new Rollingwood subdivision of the 1950s. This school has long

one-story wings with gabled roofs, extended eaves, and long bands of windows. It has recently been closed.

San Bruno Park School District administrative offices, 500 Acacia Avenue, at Jenevein Avenue (1956). This complex of two buildings is located on the site of the first Edgemont School. It was designed by architect Ernest Kump in an International style that is reminiscent of the current Decima M. Allen School. The complex also included two kindergarten rooms and four classrooms.

Crestmoor Elementary School, 2232 Crestmoor Drive (1957). This school was built to serve the new Crestmoor subdivision of the 1950s. It was recently closed by the District and has been leased to the private Stratford School.

John Muir Elementary School, 130 Cambridge Lane (1960). This school was also built to serve the new Crestmoor subdivision.

Carl Sandberg Elementary School (1961). This school was also built to serve the new Rollingwood subdivision. It has been demolished.

Crestmoor Canyon Intermediate School (1962).

Portola School, 300 Amador Avenue (1964).

San Bruno students of high school age have always attended high schools that belonged to nearby school districts, not to San Bruno Park School District. Until 1950 they attended San Mateo High School. Then, during 1949-1953, the Capuchino High School complex was built at 1501 Magnolia Avenue, in San Bruno near the Millbrae city limits. The school in fact has always belonged to the Millbrae school district, not San Bruno's. The first building in this complex was built in 1949 and opened for classes in 1950. The next eleven buildings were built during 1951-1953. Eight of the buildings in this complex were built of reinforced concrete, and four were of wood.

Regarding style, the appearance of most of the post-World War II buildings has not been researched. At least two, Rollingwood Elementary and the School District administrative offices (both 1956) were designed in an International style that was similar to the Edgemont/Allen School.

Decima M. Allen Elementary School

By 1941 the old Edgemont School was considered outmoded and so a new Edgemont School was built two blocks north, at Angus Avenue West, Elm Avenue, and Linden Avenue. That new school building was units 1 and 2 of the subject property being evaluated here. Units 3 and 4 were added in 1945-1946. The Administration Building,

Multi-purpose Building, and the Kindergarten were designed in 1953 but were not built until 1956. The architects for all of these buildings was the San Francisco firm of Masten and Hurd, although they were assisted in 1945 by architect James H. Mitchell, with whom they had worked before.

In 1956, the school was renamed Decima M. Allen School, after San Bruno's long-time librarian and school board member. She was San Bruno's librarian from 1937 to 1955, was concurrently a member of the school board for 25 years, and was also the president of the Edgemont School's PTA. As "secretary" of the school board, she signed the back of the 1941 and 1945 plans for the new Edgemont School that was later named after her. Two buildings stand that she must have worked in: the San Bruno Public Library, built in 1954 at 701 Angus Avenue (across the street from Allen School), where she worked for a year or two; and the school district's administrative offices, built in 1956 at 500 Acacia Avenue, two blocks south of Allen School. Since she was the president of Edgemont (Allen) School's PTA, she must have spent a lot of time at that school building, as well.

The architects of Allen School, Masten and Hurd (with James H. Mitchell)

Charles F. Masten (1886-1973) and Lester W. Hurd (1894-1967) were educated, respectively, at the University of California (Berkeley) and the Ecole des Beaux Arts in Paris. Residents of Berkeley and Oakland, they formed an architectural partnership and opened a San Francisco office at the end of 1919 or beginning of 1920. They rose to some prominence in 1923, when they designed a row of eight houses at 25 to 65 San Pablo Avenue in the St. Francis Wood neighborhood. They became prolific in the neighborhood, designing over 100 houses there by 1936, some for the developers of the tract, the Mason-McDuffie Company, and some for private home-owners. The styles of these houses were a variety of historical revivals — Tudor, Mediterranean, Spanish Colonial, French Provincial, and Monterey. Some of their houses had exquisite detailing, such as ornamental metals straps on the wooden doors, ornamental grilles, carved wooden balconies, and carved bargeboard, but many or most were restrained in feeling, and focused more on form and proportion than they did on ornament. In general, Masten and Hurd were more restrained than other San Francisco designers in Period Revival styles at the same time.

In the mid-1930s their practice changed dramatically, in two ways. Instead of designing mainly houses, they then began to design mainly civic and institutional buildings. Also, instead of designing in historical revivals, they veered sharply toward Modernism, specifically the Streamlined Moderne and International styles. Their adoption of Streamlined Moderne for larger buildings was consistent with the general trend among San Francisco architects in the 1930s, but their use of the International style was among the earliest, if not the earliest, of any San Francisco firm.

Their Moderne work included a pleasing firehouse in Redding, a plainer Shasta County Veterans' Memorial Building in Redding, and the University of California Press Building at 2120 Oxford Street, Berkeley (all 1939).

Their earliest known International style building is the Samuel Gompers Vocational School, at 106 Bartlett Street in San Francisco's Mission district (planned in 1935 as Agassiz School, and completed in 1939). Despite its height, this four story building is strongly horizontal in its emphasis, with prominent spandrels at each floor and bands of large windows. A curved staircase bay facing a mid-block courtyard gives the building a Moderne touch. This is the earliest International style building in northern California known to this writer.

Westside Courts, a housing project bounded by Post, Sutter, Broderick and Baker streets (with James H. Mitchell, 1943), is a complex of six three and four-story buildings. Long, unadorned balconies that face the interior of the block give these buildings a horizontal emphasis, but this is not a good example of the International style.

Hastings Law School, 198 McAllister Street (1950-1953). This is the firm's most conspicuous International style building. The building proper is five stories in height and is set back from the street by a podium that serves as a patio and gathering place for students. Most of the front is devoted to windows that are deeply recessed by horizontal and vertical shelves, or "fins," that resemble a grille. The Hyde Street side presents a blank wall to the street. Although completed fourteen years after the Gompers Vocational School, and twelve years after units 1 and 2 of Decima M. Allen School, this is nevertheless one of the oldest surviving International style buildings in the region.

Other prominent works of Masten and Hurd include the University of California Radiation Laboratory (better known as the Bevatron; 1949-1954), a circular concrete, glass and steel building; and the much-awarded Foothill College in Los Altos Hills (with Ernest J. Kump Associates, 1960-1962). The firm later became known as Masten, Hurd, and Gwathmey, and after the founders' retirements and deaths became Gwathmey, Sellier, and Crosby.

James H. Mitchell was briefly associated with Masten and Hurd, and co-designed units 3 and 4 of Allen School with them. He had worked for several years for the famous architect Willis Polk, and upon Polk's death in 1924 continued the firm as Willis Polk and Company. After about 1930 he worked under his own name. He designed in Spanish Colonial and other historical styles for many years, but when Modernism came to the San Francisco Bay Area he became a proponent of it. In 1941 he wrote, "Most house clients within my experience are slow to accept the 'modern' in more than homeopathic doses. It's great fun when one is found willing to undergo a capital operation." This leaning of his was compatible with the early Modernist bent of his occasional partners, Masten and Hurd.

Changes in school design in northern California, 1900s-1950s

Through the 19th century and the early 20th century school buildings throughout northern California were compact and roughly squarish in shape. Classrooms were typically arranged on both sides of a building and served by a central hall. This worked well as long as schools were small, but as populations, and schools, grew, multi-story block-shaped buildings became cumbersome. In order to admit more light and air to classrooms, larger schools sprouted wings to either side of the main block. In the 1920s, a different solution was found, namely that of making school buildings elongated in their form.

During the mid-20th century school planners took this solution to an extreme. Buildings became very elongated, and each classroom had a long band of windows that admitted lots of light. In suburban settings, schools were usually composed of two or more classroom buildings that were usually one story in height, plus separate auditorium, lunchroom, and/or gymnasium buildings; and they were separated by enough space that the classroom buildings would not be shadowed. Covered walks, or breezeways, that connected buildings became common. With their horizontal emphasis and ubiquitous long bands of windows, the International style was ideal for such plans.

In California, the immediate stimulus for this plan was the Field Act of 1933, which mandated earthquake-resistant school buildings. After this date, new school buildings that met the requirements tended to be one story in height and of lightweight construction, at least in suburban and rural places.

The first new school building in California to adopt these characteristics was a one-story seven-room classroom addition (1935) to the Corona Avenue School, in Los Angeles, by architect Richard Neutra. It had full-height sliding glass doors on one side, and clerestory windows overlooking a covered walk on the other side.

The architect Ernest J. Kump, Jr., of the Fresno firm of Franklin and Kump, was almost certainly influenced by Neutra's design. (See Philip Goad, 2017, for a comprehensive discussion of this.) His firm designed a series of schools along this line in the San Joaquin Valley during the late 1930s, e.g. Fowler Elementary (1938) and Ducor Elementary (1939-1940). It was a Bay Area school by Franklin and Kump that first gained national recognition, however.

This was Acalcanes Union High School, in Lafayette. It was built in stages, as had been the intention from the beginning. Three classroom buildings were built in 1939-1940, three more in 1941, three more plus a shop building were added in 1948, and two more classroom buildings plus a library were added in 1949. (An auditorium, cafeteria, and gym were intended to be added still later, but whether they were built to Kump's plan is

unknown to this writer.) Susan Dinkelspiel Cerny, in *An Architectural Guidebook to San Francisco and the Bay Area* (2007), wrote that upon completion, “the school was immediately recognized for its innovative concept. The Museum of Modern Art in New York included Acalanes in an exhibit as an outstanding example of American architecture. It’s a one-story modular plan of classrooms connected by covered walkways supported by thin, round metal pipe posts. The concept of classrooms opening onto an open covered hallway became a standard for school architecture between 1946 and 1970.”

Kump pointedly departed from Neutra’s 1935 design in a number of ways while also emulating it; and Kump’s own work was not static, for he constantly worked out new variations on the theme. Nevertheless, a recognizable school building type emerged during the 1940s and 1950s, of which the most important prototypes seem to have been by Neutra and Kump.

One other influence on this building type is perhaps worth mentioning, namely, hospitals. During the 19th century hospitals became notorious for spreading diseases rather than curing them, and an outgrowth of this problem was the pavilion plan of hospitals, which derived in part from the work of Florence Nightingale. Instead of block-shaped hospitals, hospitals composed of narrow wings became the norm. These wings facilitated separation of some patients from others, and allowed plenty of light and fresh air for ventilation into patients’ rooms. Whether purposefully or unconsciously, the pavilion plan of hospitals may have influenced mid-20th century school design.

This description of late-1930s and 1940s schools given above sounds a lot like Decima M. Allen School. It, too, is composed of narrow one-story wings with broad bands of windows, and possesses covered walks with roofs supported by steel poles. Like Acalanes School in Lafayette, it was built in stages. Notably, the first buildings at Allen were built in 1941, less than two years after the first buildings at Acalanes. It may well have been the first school of this type on the San Francisco peninsula.

Whether Masten and Hurd knew Ernest J. Kump, Jr. in 1941, or not, is unknown, but they certainly knew each other in the 1960s, when they collaborated on the design of Foothill College, in Los Altos Hills. By then, however, these architects had moved on from their early ideas about school design, for Foothill College’s buildings look nothing like International style schools of the 1940s and 1950s.

Integrity

The major alterations to this complex after 1956 have been to the window sash (from wood to aluminum) of the Angus Avenue side of Unit 1, and to the entrance area of the Angus Avenue side of the Administration Building, both, most likely, in 1999-2000. Less important, the covered breezeway of 1956 probably was originally glazed with plexiglass

that has been removed. Some of the landscaping in the courtyards has probably been changed as well. The Unit 1 sash alteration is the most serious of these changes. Nevertheless, the window openings in Unit 1 remain the same size as they were when built, and the original wooden mullions and sills remain as well.

Overall, this property retains integrity of location, design, materials workmanship, feeling, and association. The setting is also largely retained, as the lawn along Angus Avenue remains, the courtyards between the classroom buildings remain (even if some of them are probably altered), the covered breezeways remain, and the surrounding buildings, including the library of 1954, largely date from the 1950s.

Evaluation

Evaluation under Criterion 1 of the California Register: Resources that are associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.

This is the oldest surviving school in San Bruno. It dates only to the 1940s and 1950s, however, and thus does not represent San Bruno's early history. Its modest age does not seem very significant, and for this reason, the subject property does not appear to be eligible for the California Register under this criterion.

Evaluation under Criterion 2 of the California Register: Resources that are associated with the lives of persons important to local, California, or national history.

Principals and teachers associated with this school have not been researched. To do such research would take an enormous amount of time and work, and it seems unlikely that these would have historical importance under this criterion of the California Register. The one person whose association with this school is known is Decima M. Allen. Her importance in San Bruno's history, both as a librarian and as a school board member, is well-established, but two other buildings, the library and the school district's administration building, evoke her memory more significantly. For this reason, the subject property does not appear to be eligible for the California Register under this criterion.

Evaluation under Criterion 3 of the California Register: Resources that embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master, or possess high artistic values.

This school complex's International style, its form of narrow, one-story buildings that step down the hillside, and the use of steel poles to support the roofs of covered walks, were established when Unit 1 and Unit 2 were built in 1941. Units 3 and 4 continued this style and form when they were added in 1945-1946. The three buildings of 1956 have

enough features in common with the older buildings that the entire complex forms a consistent ensemble, one that is tied together by the covered breezeways.

This complex is important because it is the second earliest school of this style and form that is known of in the San Francisco Bay Area — after Acalanes School in Lafayette — and is the oldest that is known of on the San Francisco peninsula. The oldest part of Acalanes, which established the school style in this region, was built less than two years before the oldest part of Allen School. The style and form of these schools is important in architectural history because they became extremely common in schools around not only northern California, but around the United States. These two schools were pioneers of what became a very common style.

This school complex is also significant under this criterion as one of the earliest International style works by the San Francisco firm of Masten and Hurd, who were important pioneers of Modernism in northern California. One work of theirs, Gompers School on Bartlett Street in San Francisco (1939), is a slightly earlier example of the International style than this one is, but the 1941 date of Allen School's units 1 and 2 is still very early.

For the most part, the buildings in this complex do not possess strong aesthetic appeal. Aesthetically, the best aspects of the property are the way the massings of units 1 through 4 step down the hillside, the presence of a long lawn in front of Unit 1, and the bowed wooden ceiling of the Multi-purpose Building. For the most part, however, the buildings, with their stucco walls and lack of fine detailing, are bland. It is for its historical importance as a pioneer in this style of school building, and as an early example of the Modernist work of Masten and Hurd, that this complex possesses historical importance.

Accordingly, the property appears to be individually eligible for the California Register under this criterion, at the regional level. The Period of Significance is 1941, 1945-1946, and 1956, the years the complex was built. Contributing elements of the historic property are all seven of the buildings, the covered breezeways, the lawn in front of Unit 1, and the courtyard spaces between units 1 through 4. The aluminum sash in Unit 1 and the altered entrance of the Administration Building are non-contributing features, and the altered aspects of the courtyards are also non-contributing.

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Sanborn Insurance Company map for San Bruno. Sheet #5, 1949 and 1953, shows Capuchino High School.

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Stafford L. Jory. “Recent Houses: Charles F. Masten and Lester W. Hurd.” In *Architect and Engineer*, December 1926.

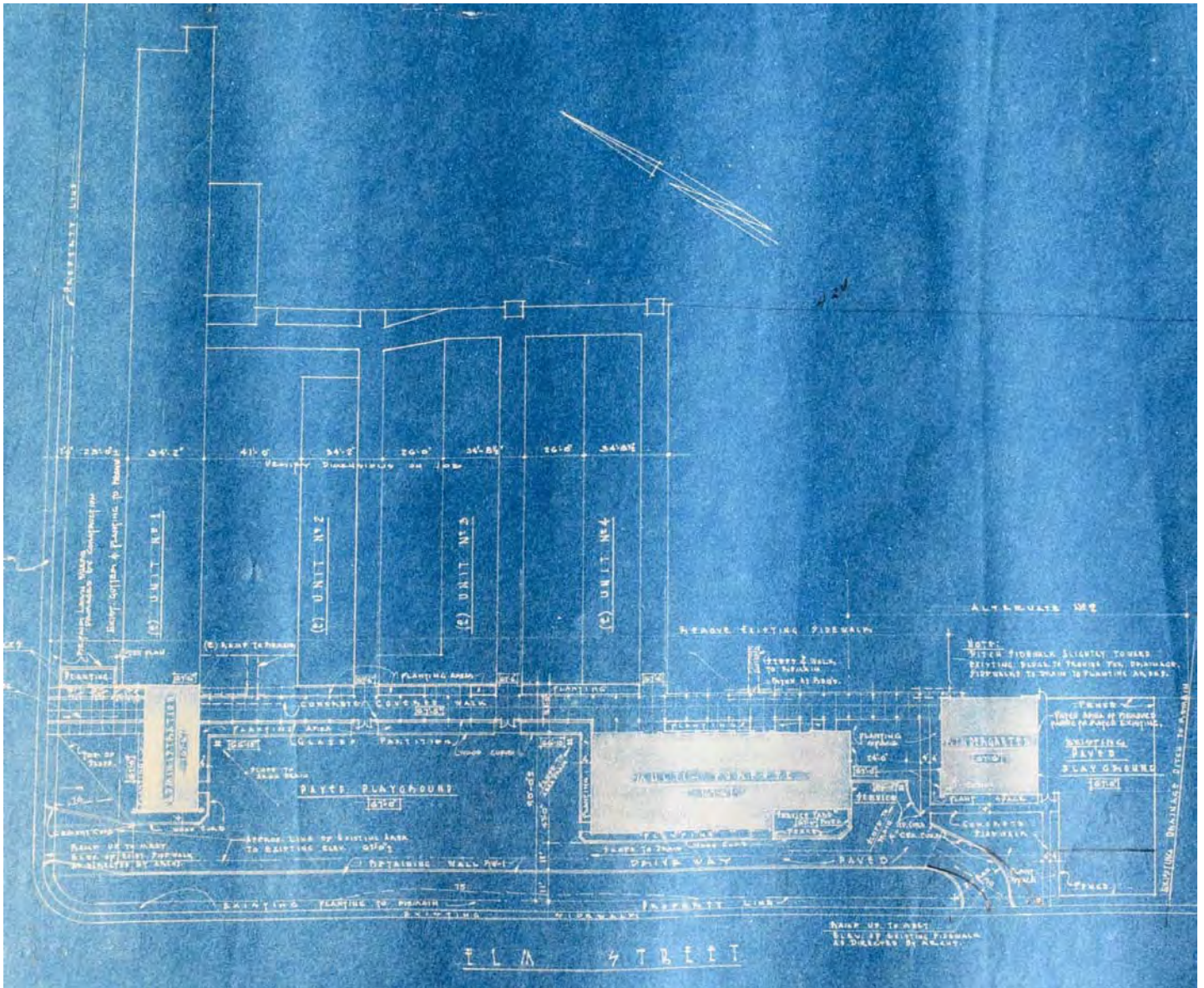
William Kostura. Personal research on the firm of Masten and Hurd.

Sanborn map and plot plans

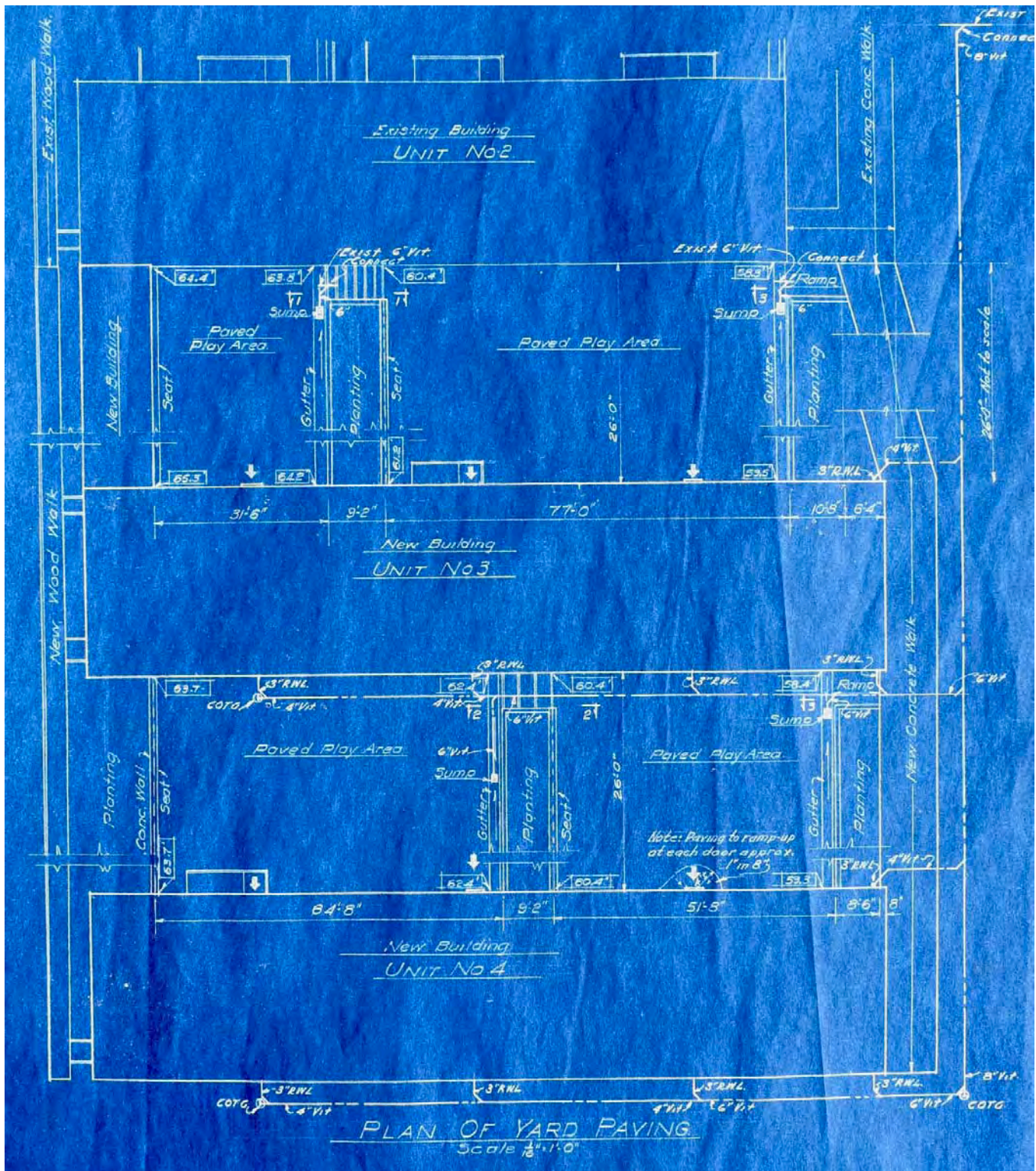


1949 Sanborn map, page 8. Edgemont School is at upper right. See next page for detail.

16



All-buildings plot plan, from the plans of 1953. Existing units 1 through 4 are at top, from left to right. Planned new buildings (actually built in 1956) are at bottom, shaded: the Administration Building, the Multi-purpose Building, and the Kindergarten. Covered walks are shown, too.



Photographs of Allen School buildings, drawn elevations, details, and floor plans



Top: Unit 1, north side, view looking SW

Middle: Unit 1, north side, view looking SE

Bottom: Unit 1, south side, view looking NE



Top: Unit 1, detail of window, north side, showing aluminum sash in original openings with wooden mullions and sills

Middle: Unit 1, roof detail

Bottom: Unit 1, hall

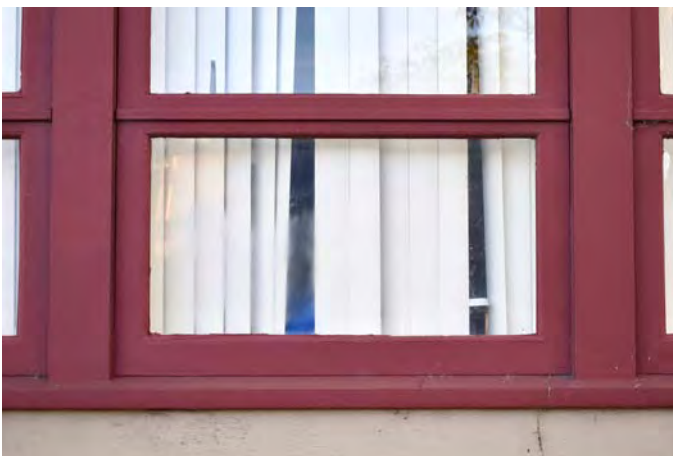




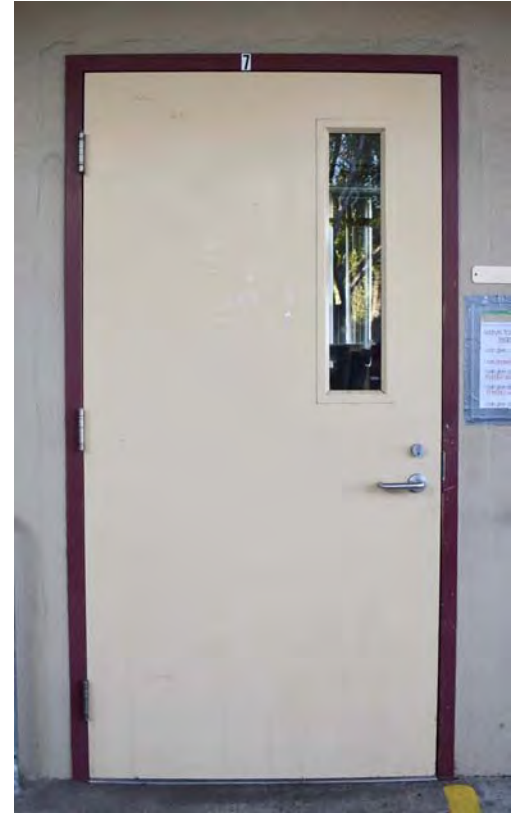
Top: Unit 2, north side, view looking SE



Middle: Unit 2, north side, windows with original wooden sash



Bottom: Unit 2, north side, detail of original window sash, sill, and mullions



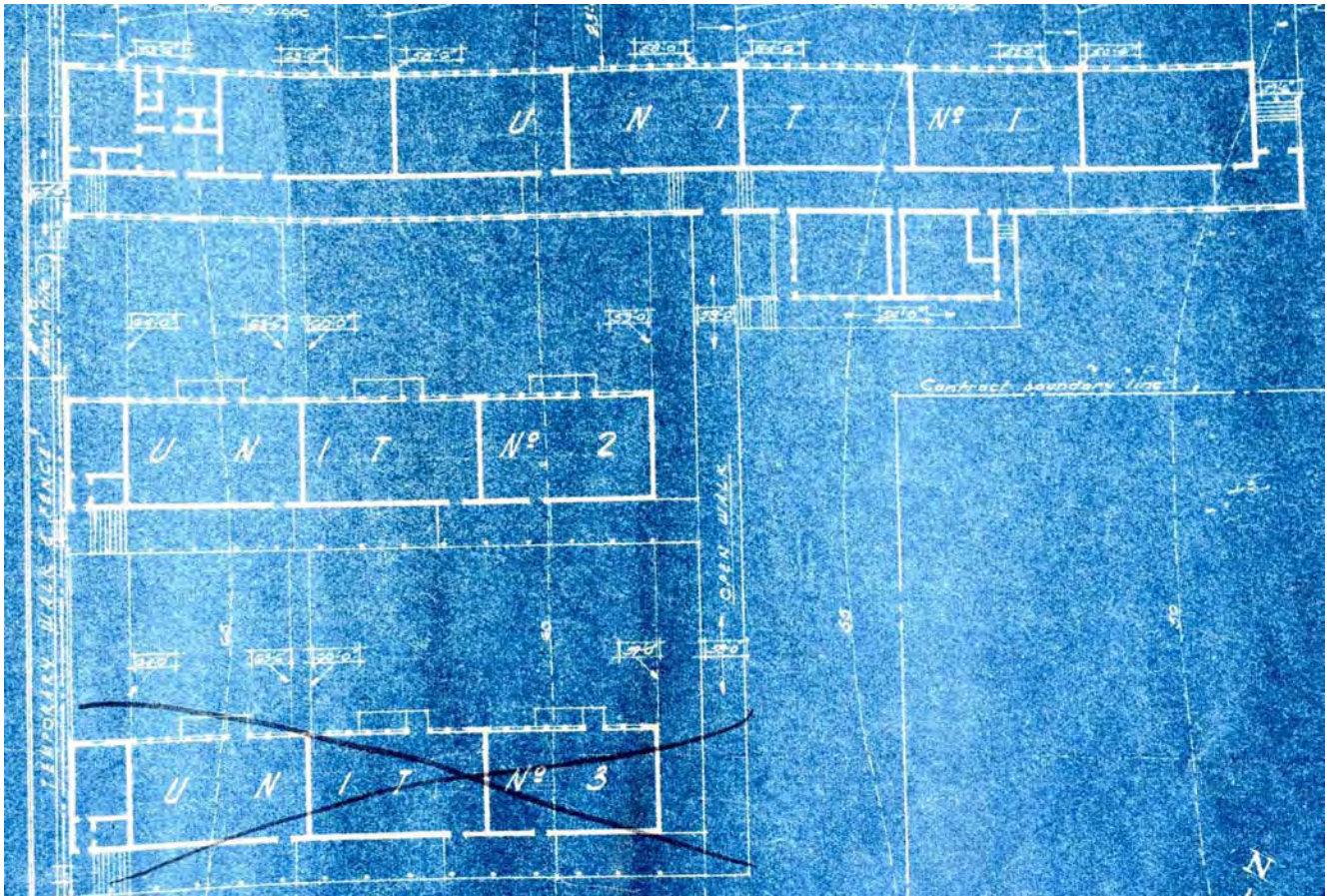
Top left: Unit 2, south side, showing plain stucco wall and covered walk of wood with steel poles

Top right: Unit 2, steel door to classroom

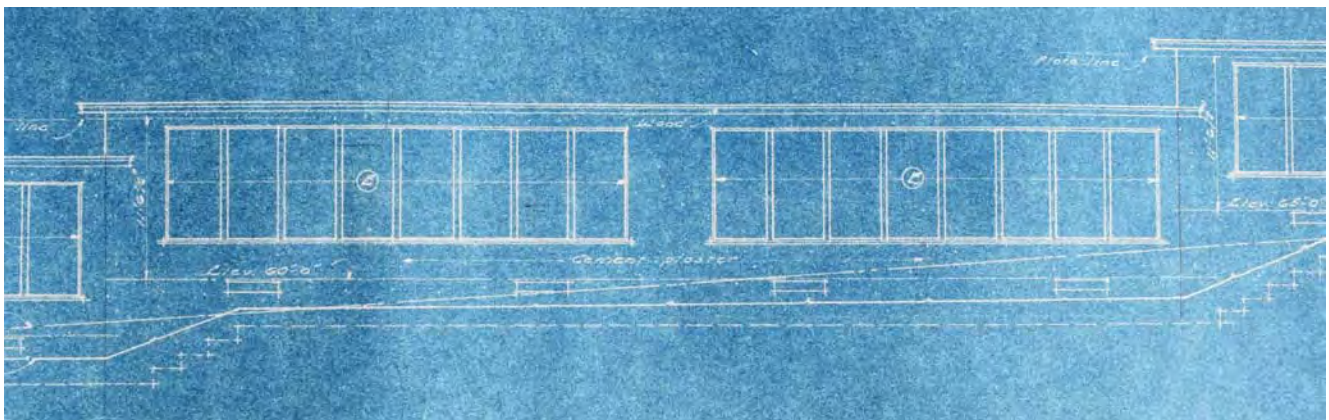


Middle: Unit 2, deck shot down the covered walk, view looking west

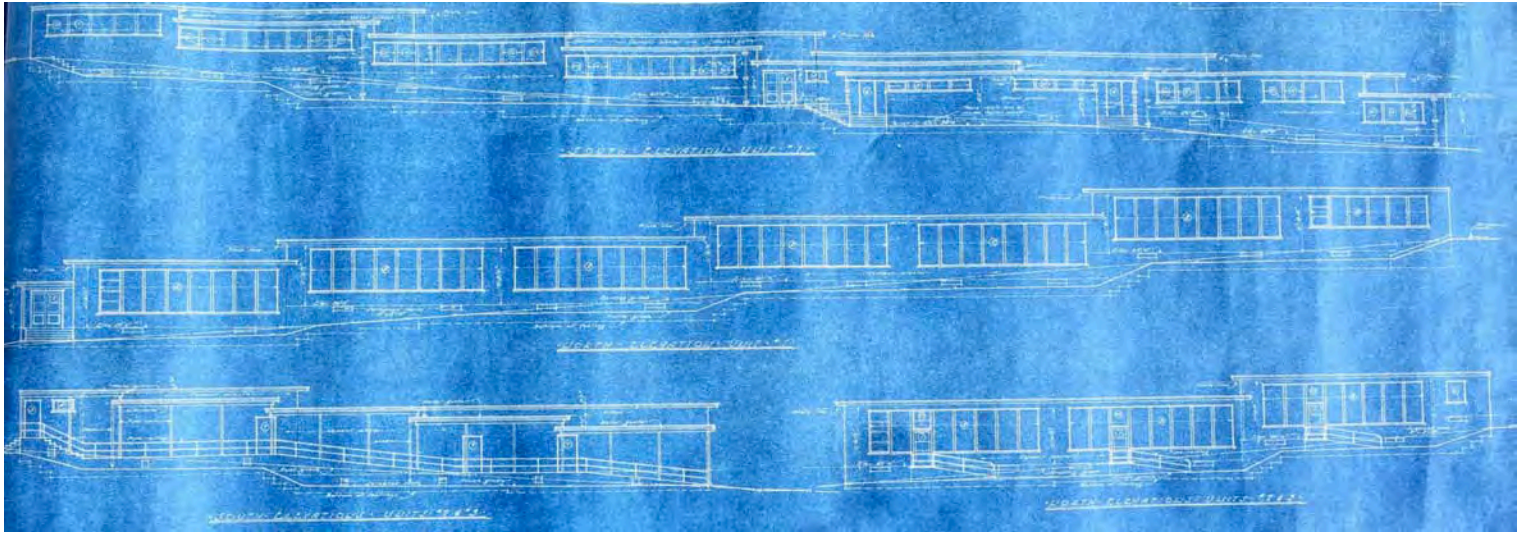
Bottom: Unit 2, ceiling of covered walk



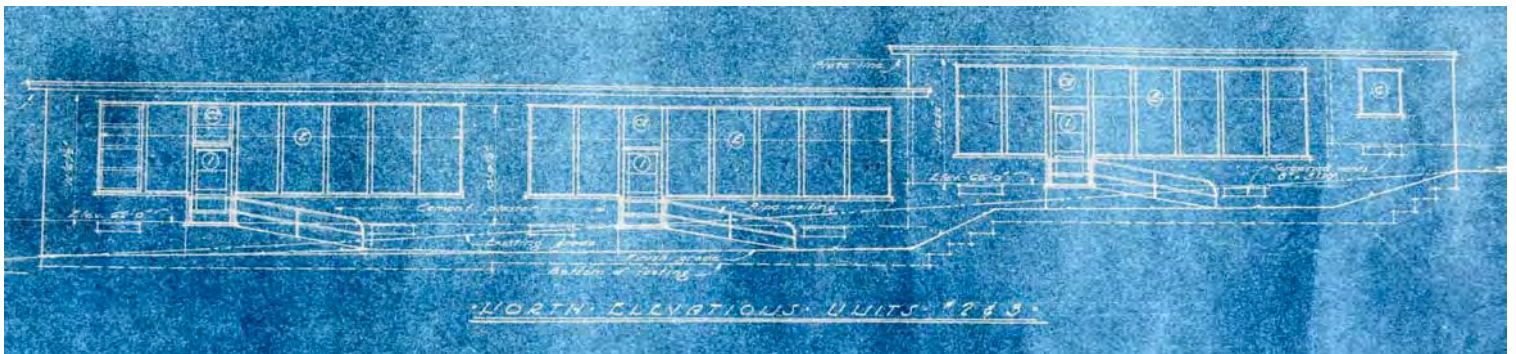
Plot plan of 1941, showing units 1, 2, and 3. An “X” through Unit 3 indicates that although it was planned in 1941, it was not built then.



Unit 1, detail of elevation of north side (1941)

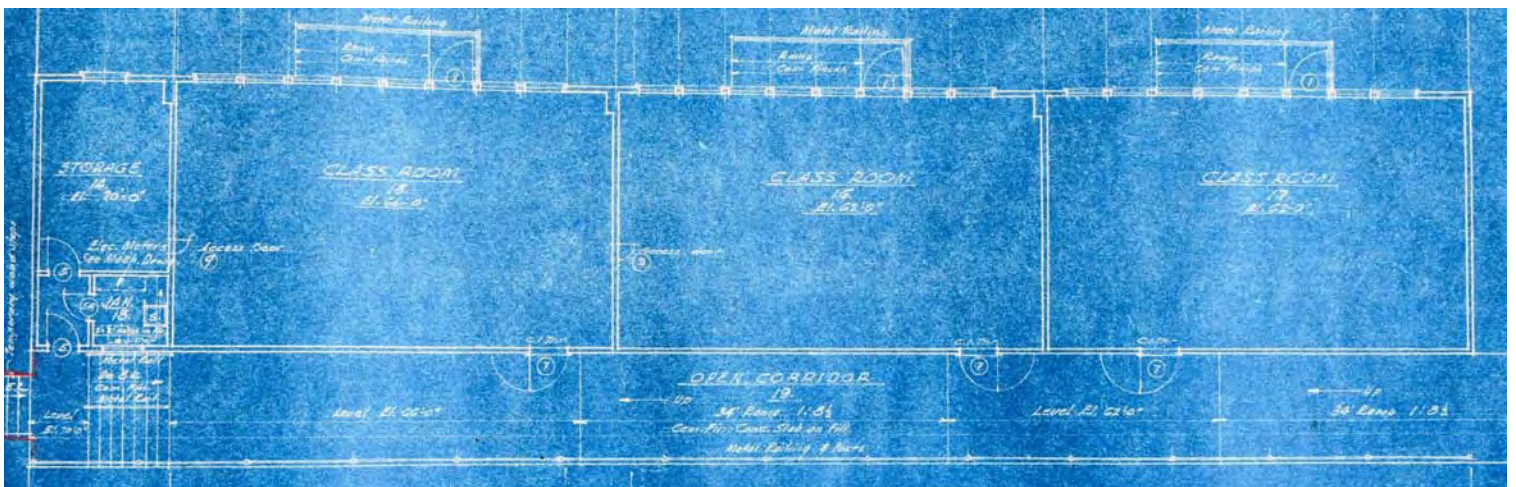


From the plans of 1941. Top: Unit 1, south elevation Middle: Unit 1, north elevation
Bottom left: Unit 2, south elevation Bottom right: Unit 2, north elevation



From the plans of 1941. An enlarged detail of the north elevation of Unit 2

Below: Unit 2, floor plan, from the plans of 1941





Top: Unit 3, north side



Middle: Unit 3, east side

Bottom: Unit 3, covered walk





Unit 4, north side (at left) and detail of window and door (at right)



Unit 4, south side, view looking north



At left: Unit 4, covered walk looking NE

At right: Unit 4, covered walk, deck shot looking east



Unit 4, south side, roofs of building and covered walk. The roofs of Unit 3 look the same.

acoustical plaster

all operative

fixed

all operative

wd

cem. orb. bld

cem. orb. bld wainsc. asph. base

wood louver door

NORTH

interior elevations at $\frac{1}{4}'' = 1'-0''$

27

28



Court between units 1 and 2, view looking east. The ramps and railing are non-original.



Court between units 2 and 3, view looking east. The ramps and railing are non-original. The planter at right may be original, while other plantings are not.



Court between units 3 and 4, view looking east. The ramp and railing are non-original.



Court between units 3 and 4. These planters are non-original.



Administration Building, view south. The long aluminum window at right is original.



Administration Building, perspective view SE, showing original window



Administration Building,
perspective view NE of
west and south walls



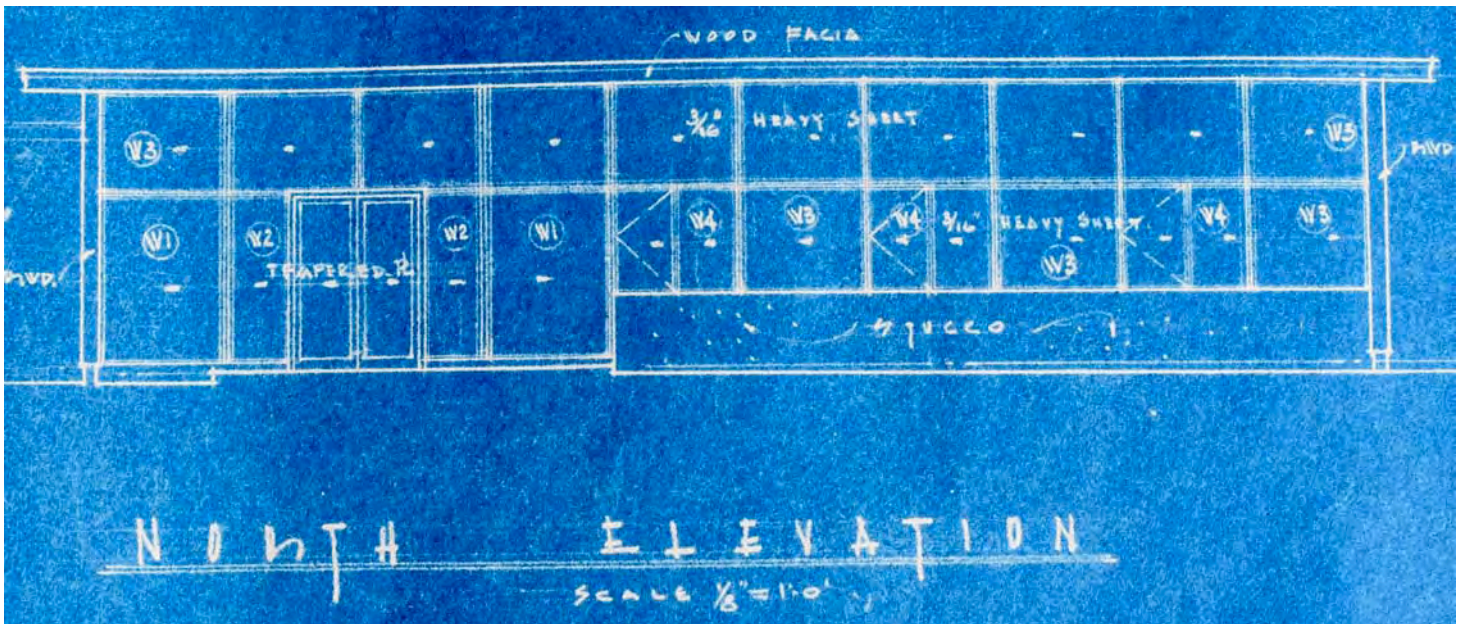
Administration Building, main entrance area. The aluminum door and surrounding glazing appear to be non-original and were probably placed in 1999-2000.



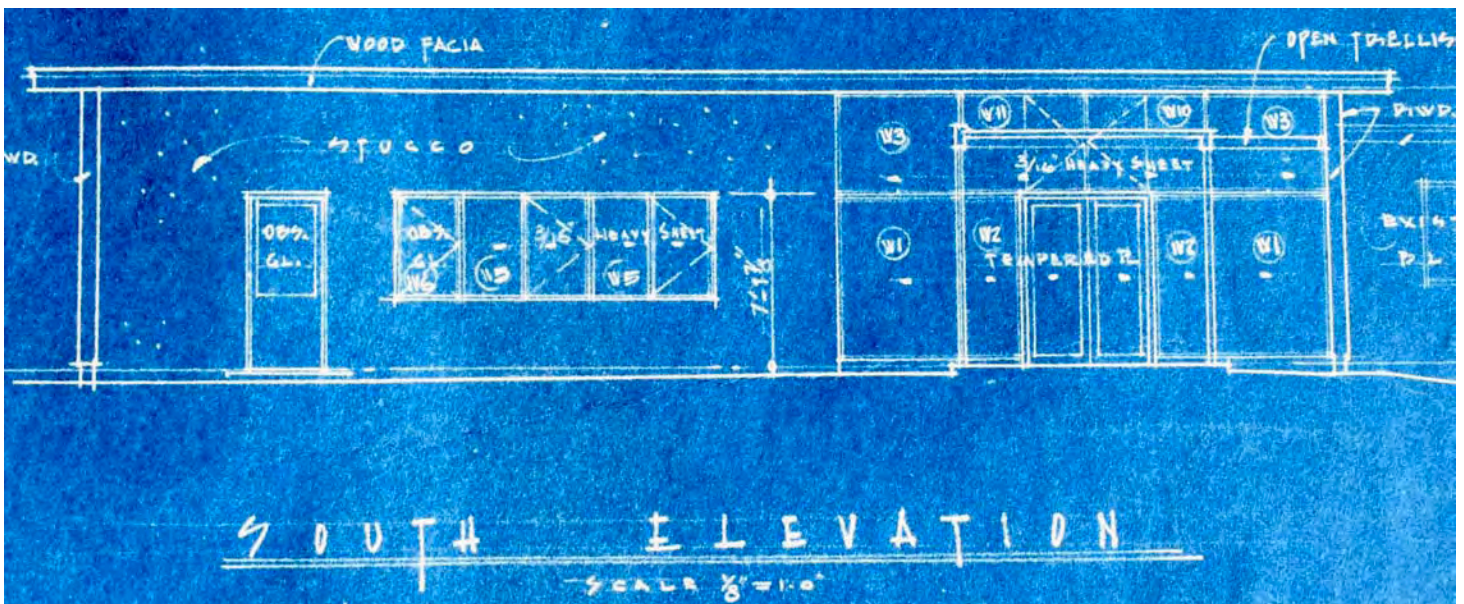
Administration Building, base of north side



Administration Building, altered south entrance



Administration Building, north elevation, from 1953 plans



Administration Building, south elevation, from 1953 plans



Top left: Multi-purpose building, view SE toward the north and west walls

Top right: Multi-purpose building, original steel sash windows in west wall



At left: Multi-purpose building, south wall

Below: Multi-purpose building, interior, bowed ceiling and beams





Top: Kindergarten/Media Center, south side (primary facade)

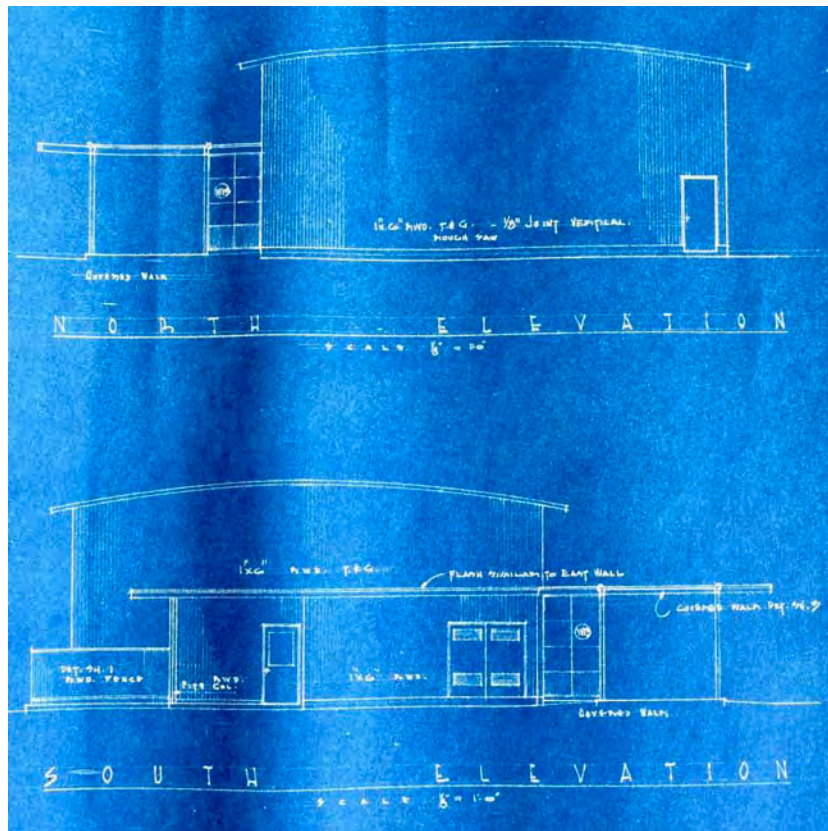


Middle left: Kindergarten/Media Center, north side

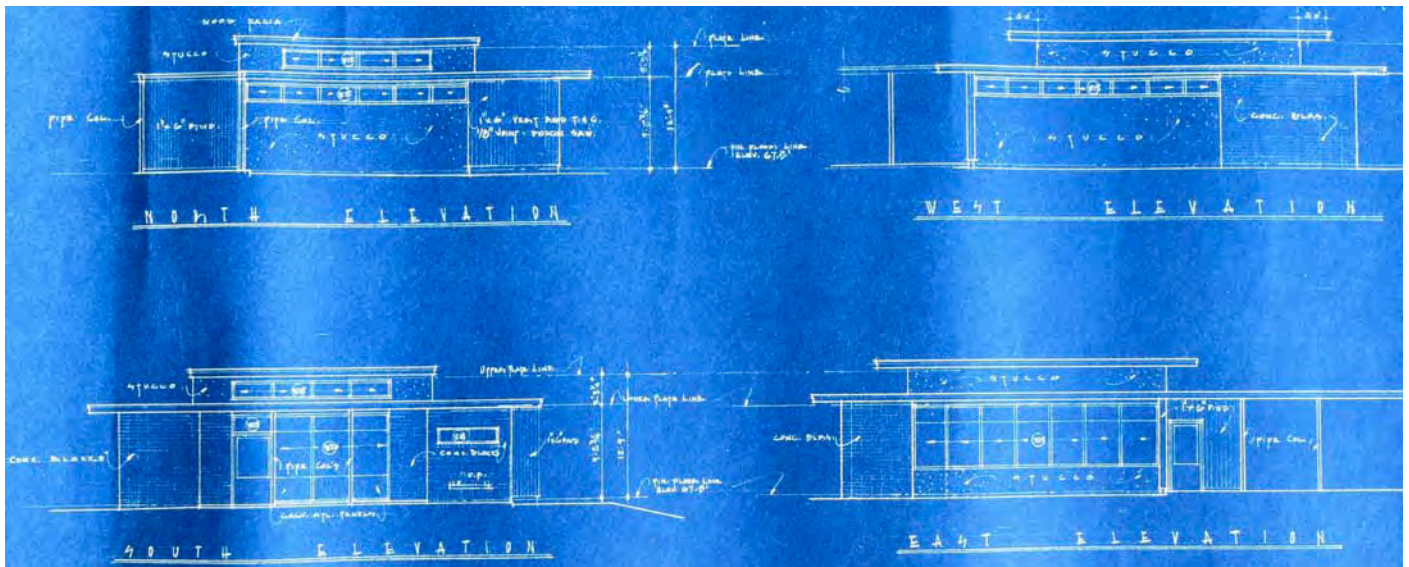
Middle right: Kindergarten/Media Center, east side

Bottom: Kindergarten/Media Center, west side





Multi-purpose, north and south elevations, from 1953 plans



Kindergarten, from left to right and top to bottom: north, west, south, and east elevations, from 1953 plans



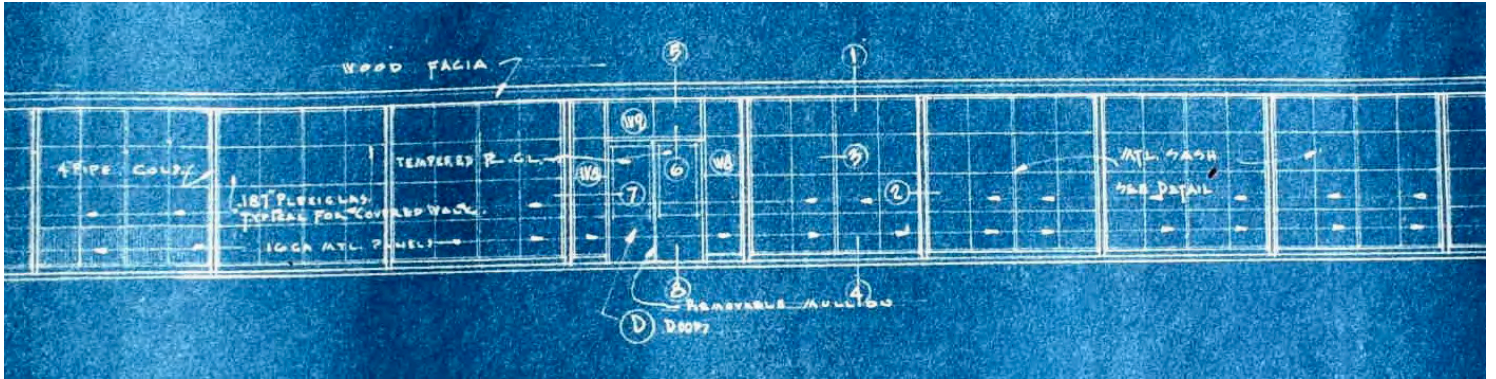
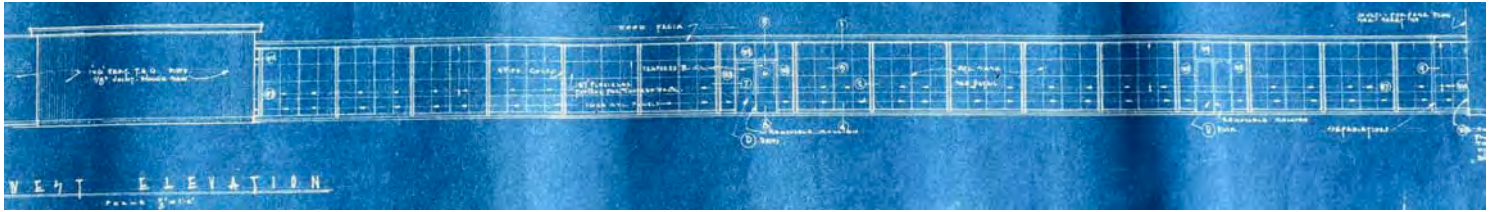
Above: Covered walk or breezeway of 1956, view east



At left: Covered walk of 1956, deck shot, view looking south. Note the lack of glazing.



At left: Covered walk of 1956, detail of door with steel mesh



Top: Administration building at far left, with covered walk along the west side of the campus. From the plans of 1953

Middle: Enlarged detail of the above. This plan indicates plexiglass glazing, which no longer exists.



Wooden sign adjacent to the Administration Building.



Lawn in front of Unit 1



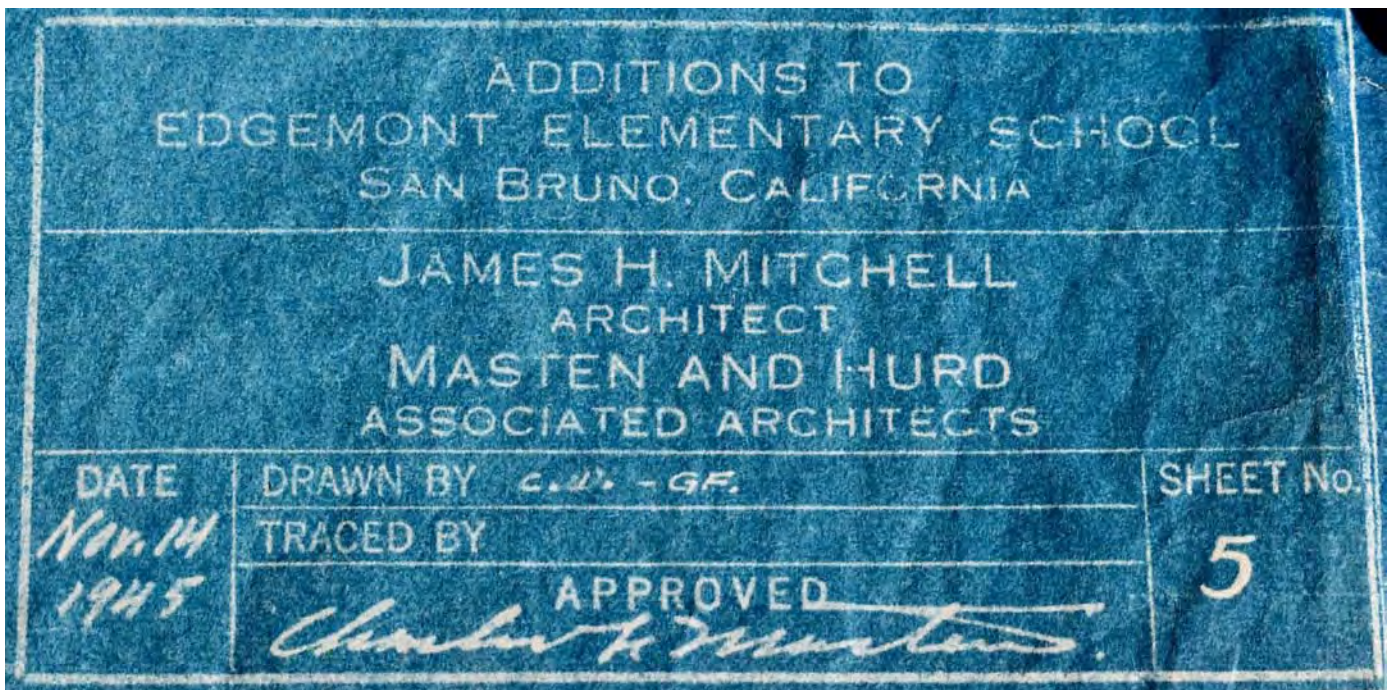
At left: Redwood tree at the east end of Unit 1

Bottom: Paved playground east of units 2, 3, and 4





Title block from 1941 plans



Title block from 1945 plans



Charles F. Masten's signature from 1945 plans

Early San Bruno Schools



San Bruno Park School, aka The Old Tin School House, on El Camino Real. It served as the city's primary school from 1906 to 1910, then was Green Hall, a municipal building, and from 1910 to 1956 it was San Bruno's City Hall. Photo from San Bruno Public Library.

Edgemont Grammar School, built in 1910 where the school district's administrative offices are now. It was torn down in 1956. Photo from San Bruno Public Library.

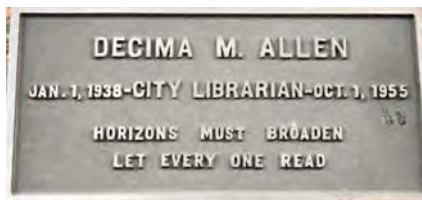


North Brae School, built in 1912. Photo from San Bruno Public Library.

Other sites associated with Decima M. Allen

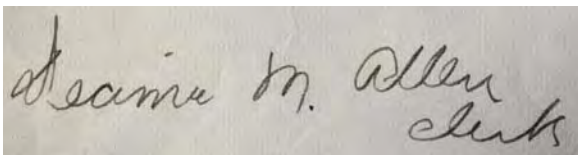


San Bruno Public Library, built in 1954 across the street from today's Decima M. Allen School. Allen retired as the city's librarian in 1955, one year after this school was built.



At left: plaque at the library

Blow: Decima M. Allen's signature from the plans of 1941, when she was the clerk of the school board



Bottom: School district offices at Acacia and Jenevein.



Sonoma School in Livermore: a school building of the type first developed in the late 1930s and the 1940s



The two classroom buildings, one of which is at left, were built in 1961. Below is a covered walk supported by steel poles.

This school is evidence of how long the school building type represented by Allen School continued to be built.



Bottom: the Multi-purpose Building was built in 1965.



Some works of Masten and Hurd



Most of Masten and Hurd's early work, from 1920 through the mid-1930s, was for Period Revival houses in St. Francis Wood in San Francisco. These are two of the roughly 100 houses they designed in that neighborhood.



Samuel Gompers Vocational School, 106 Bartlett Street, San Francisco. It was planned in 1935 and built in 1939. The long bands of windows are a hallmark of the International style. San Francisco Public Library photo AAD-8873.



Hastings College of the Law, in San Francisco, built in 1950-1953.

D. Traffic Study

Decima Allen Elementary School Replacement Traffic Study

For

San Bruno Park School District

October 2020

PHA Transportation Consultants

2711 Stuart Street Berkeley CA 94705

(510) 848-9233

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APPENDIX (under separate cover)
LOS Calculations
Traffic Counts

Executive Summary

The San Bruno Park Unified School District is proposing to replace and upgrade its Decima Allen Elementary School campus at West Angus Avenue, San Bruno with new classroom buildings and playfields. The school currently has about 400 students currently. The new school is expected to have a capacity for about 500 students.

The proposed plan will reconfigure the current campus with new classroom and administration buildings along with new relocated ball fields and play fields. The staff parking lot will be relocated to a new location on Linden Avenue near the San Bruno City Offices and Fire Station. The new school will have an internal drop-off/pick up lane as opposed to the current curbside drop-off on West Angus Avenue. The new school is expected to add about 100 students, 75 kindergarteners to be relocated from the Hesselgren facility on Elm Avenue near the District building. In essence, the new school will only add about 25 new students.

School Trip Generation and Impact

Based on a worst-case scenario projection estimated from a parent transportation survey indicating that over 90 percent of the students will be driven to school, the added 100 students could add about 198 and 148 one-way morning and afternoon trips respectively. However, based on the industry standard trip rate for elementary school, the added students would add about 50 and 38 one-way trips during morning and afternoon peak hours, respectively.

With the worst-case high trip generation estimates, the study evaluated traffic operational Level-of-Service (LOS) at five (5) street intersections that control traffic flows to and from the school to identify the potential traffic impact of the added students. It also assessed traffic associated with the construction of the new school. Results indicated that all study intersections currently operated at good LOS (LOS A and C). With the added worst-case school traffic and construction traffic, all of the study intersections would continue to operate at the same LOS, and no insignificant impacts are identified.

Traffic Safety

A review of the traffic safety in the area indicated there were 18 reported traffic collisions in the area between 2016 and 2018. Most of the traffic collisions occurred near El Camino Real and Jenevein Avenue; no collisions were reported near the Allen School campus. The two West Angus intersections at Elm and Linden are controlled by all-way stop signs and pedestrian crosswalks. School staff also supervised students crossing during drop-off and pick up times to ensure student safety. Field observations indicated that vehicle and pedestrian traffic generally move in an orderly fashion and under the speed limits. No particular safety problems were observed during the surveys.

Parking Assessment

A parking adequacy assessment was conducted for the school area. The assessment found that the study area has the capacity to accommodate parking for 245 cars on the street. An hourly parking survey indicated there were 95 and 79 free parking spaces during morning drop-off and afternoon pickup times, respectively.

The new drop-off/pick up lanes design will accommodate drop-off and pick up within the school property, will improved student safety and minimize vehicle conflicts on the street. The school will develop a drop-off and pick-up plan and distribute it to parents to follow. The plan would direct parents to drop off and pick up their students at the drop-off zone at West Angus Avenue, and indicate that no drop-off should take place at the staff parking lot. The plan also would provide detail procedures and recommend travel routes for parents.

Recommendations

The study found that the replacement school, as proposed, will not create significant impacts in area circulation. The proposed internal drop-off and pickup lane will improve circulation and safety on West Angus Avenue. To further improve traffic and parking conditions, this study includes the following design and operations recommendations:

1. Assign staff to monitor drop-off/pick-up operations and assist parents as needed.
2. Continue to assign staff to supervise and assist students crossing at the West Angus intersections at Elm Avenue and Linden Avenue during drop-off and pick-up times.
3. Retain the current white curb along the school frontage on West Angus for additional drop-off and pick-up, and school bus access in the future.
4. Direct parents to drop off and pick up their students at the new drop-off area in front of the school at West Angus Avenue. Prohibit student drop-off and pick-up at the staff parking lot.

1. Introduction

1.1 Study Purpose

PHA Transportation Consultants (PHA) conducted a traffic study for San Bruno Park Unified School District in January 2020. The purpose of the study was to evaluate the potential traffic, parking, and construction impacts associated with the proposed replacement project at Decima Allen Elementary School at West Angus Avenue.

1.2 Proposed Project

The school site is bounded by West Angus Avenue to the north, Linden Avenue to the east, Elm Avenue to the west, and residential houses to the south. The proposed work will include demolishing the current classroom/administration buildings and replace it at the eastern edge of the school site on the side of Linden Avenue. The current play area will be reconfigured with nature play areas and ball fields. The current staff parking lot at the southeast corner of Elm Avenue and West Angus Avenue will be relocated to the southeast corner of the school site and will be accessed via Linden Avenue. The project will create an internal drop-off and pickup zone. Drop-offs and pickups will occur within the school property instead of along the curbside of West Angus Avenue. The school currently has an enrollment of about 400 students. The proposed replacement will increase the student capacity to about 500. Figure 1 shows the location of the school and Figure 2 shows the proposed school site plan.

1.3 Scope of Study

The study scope, designed to identify the potential project impact on area traffic circulation, was reviewed, refined, and approved by City of San Bruno staff. The main objective of the study is to identify the potential impact associated with the proposed “Replacement School Project”, and develop necessary mitigation measures should significant impacts are identified. Specifically, the study focuses on the analysis of the following critical areas of concern:

1. Evaluates “Project” traffic impact in terms of traffic operations/Level-of-Service (LOS) for critical streets and intersections that provide access and circulation to the school and in the study area
2. Identify parking saturation and available spaces near the school that can accommodate parent drop-off and pickup during the school peak times.
3. Review study area traffic collisions to identify collision hotspots and traffic safety issues.
4. Evaluate truck traffic and construction crew traffic during construction periods to identify impact on study area intersections.

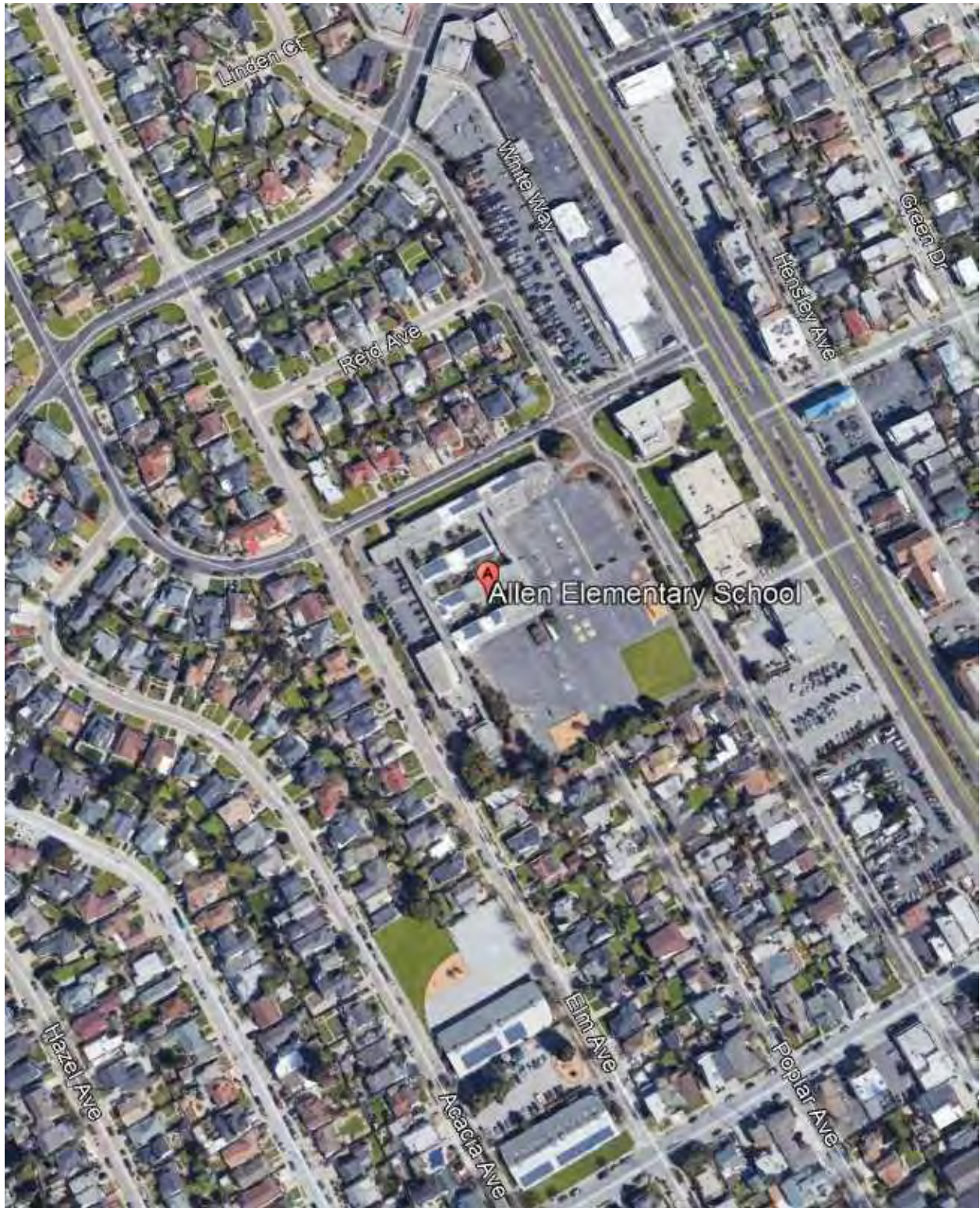


Figure 1 Current School Location
Decima Allen Elementary School Traffic and Parking Study – San Bruno

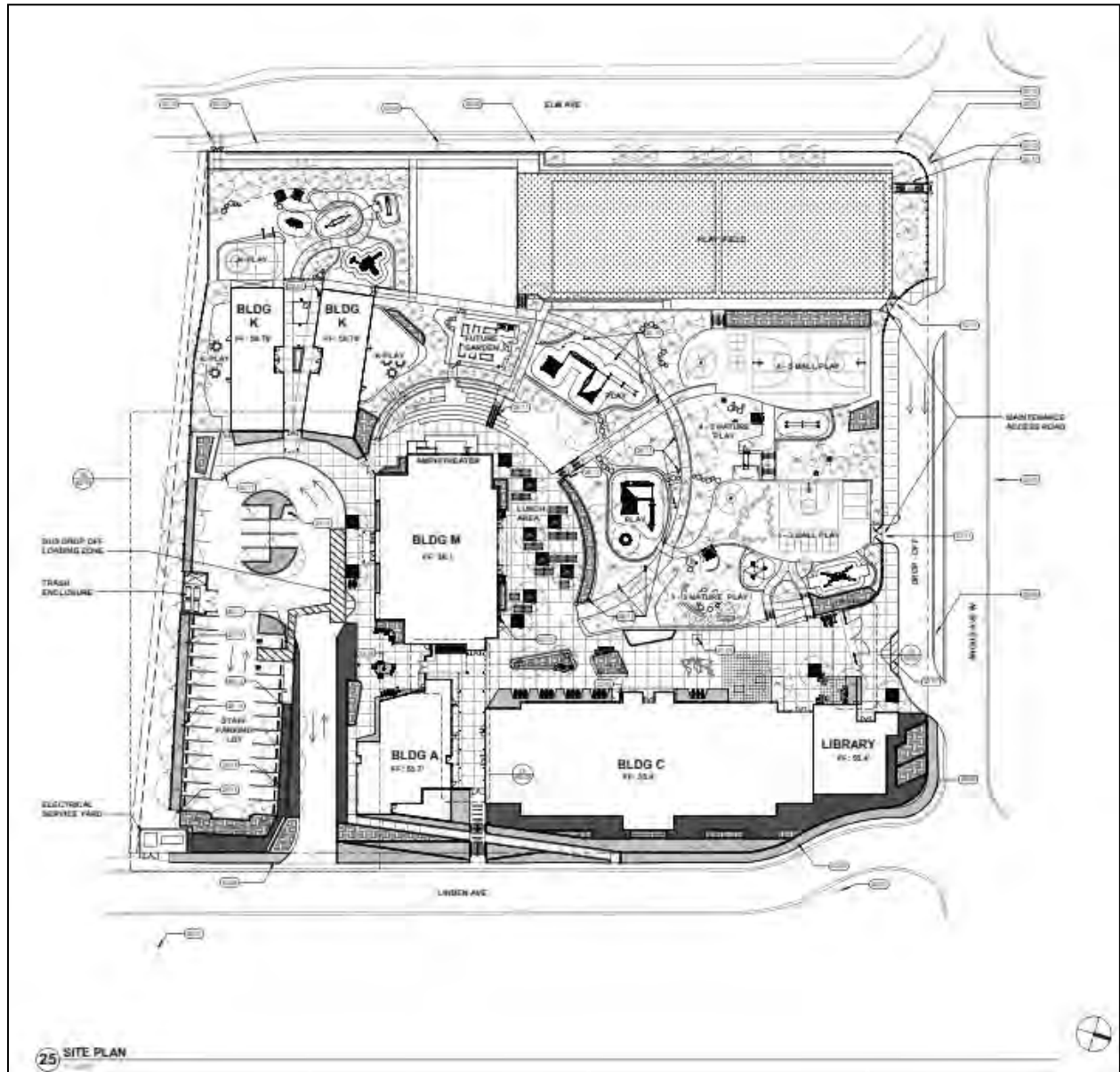


Figure 2 Proposed Decima Allen Elementary School Plan – Source: HY Architects
Decima Allen Elementary School Traffic and Parking Study – San Bruno

Below is a list of scenarios, street intersections, and street segments included in the study.

Study Scenarios

1. Existing Conditions (Before Project)
2. Project" Conditions (After Project)
3. Cumulative Conditions (Plus Mills Park Project)

Study Intersections

1. Angus Avenue/Elm Avenue
2. Angus Avenue Avenue/Linden Avenue
3. Jenevein Avenue/Elm Avenue
4. Jenevein Avenue/Linden Avenue
5. El Camino Real/Jenevein Avenue
6. New staff parking lot access/Linden Avenue (for project conditions)

Study Street Segments

1. West Angus Avenue (between El Camino Real and Elm Ave.)
2. Elm Avenue (between Kains Ave. and Jenevein Ave.)
3. Linden Avenue (between Kains Ave. and Jenevein Ave.)
4. Jenevein Avenue (between El Camino Real and Elm Ave.)

1.4 Study Approach

Below is a brief description of the study methodology and step-by-step approach:

- Conduct traffic turning movement counts at the study intersections during school peaks, these data will be used to conduct traffic operation/LOS analyses to establish a baseline traffic condition.
- Determine study-area capacity for parking and conduct hourly parking count to assess current parking saturation level, and available parking spaces available for parent parking during drop-off and pickup times.
- Research and review traffic collision records in the area to identify collision hotspots.
- Estimate added school trips as a result of increased school capacity.
- Conduct study-intersection traffic LOS analyses with the added school trips to identify "Project" impact.
- Evaluate Mill Park project effects on cumulative traffic impacts
- Estimate construction crew and truck traffic based on data obtained from the construction contractor.
- Conduct study intersection traffic LOS analyses with the added construction trips to identify construction traffic impact.

2. Current School and Area Description

2.1 School Descriptions

Decima Allen Elementary school is a public elementary school providing K-5 education to area residents. The school is located at 750 West Angus Avenue and was founded in 1941. The school currently has an enrolment of about 400 students. Classes generally begin at 8:15 and 8:25 am for upper and lower grades respectively, and end at 12:30 for kindergarten and 2:46 pm for all other grades. Thursday is the early release day and all classes end at 1:20 pm. Table 1 shows a breakdown of the students enrolled at each grade level and their respective class schedule.

Table 1 School Class Bell Schedules Decima Allen Elementary School Traffic and Parking Study – San Bruno			
Allen School	Students	Classes Begin	Classes End
Kindergarten	78	8:25 am	12:30 pm
Grades 1, 2, 3	188	8:25 am	2:46 pm
Grades 4, 5	125	8:15 am	2:46 pm
Total	391	---	---
After School Programs	(100) ^a	3:00 pm	6:00 pm
^a : Students who stay for after-school programs are part of the entire school student count Sources: Allen School Principal and school website			

The school currently has about 400 students and 30 teaching and administrative staff. It has a staff parking lot located at the northwest corner of the property near the West Angus Avenue intersection with Elm Avenue. The parking lot has two driveways; one entrance driveway at West Angus Avenue one exit driveway at Elm Avenue. The school administration and classroom buildings are on the northern edge of the property along the frontage of West Angus Avenue and near Elm Avenue. The curb along the school frontage is painted white for student drop-off and pickup. There are two entrances to the school on West Angus Avenue; the primary entrance is near the intersection at Elm Avenue and the secondary entrance is near Linden Avenue. Figure 3 shows the current school layout.



Figure 3 Current Decima Allen Elementary School Site Layout
Decima Allen Elementary School Traffic and Parking Study – San Bruno

2.2 Student Transportation Patterns

PHA, with assistance from school staff, conducted a parent/student transportation survey to identify current student transportation patterns. Results indicated that about 90% of students were being driven to school; while about 10% either walk, bike, or carpool. The survey indicated that the majority of parents drop off and pick up their children from curbside along West Angus Avenue in front of the school, Elm Avenue and Linden Avenue near the school. According to school staff, there are about 100 students enrolled in the after-school program which runs between 3 and 6 pm. Table 2 summarizes survey results, which was based responses from parents of 66 out of about 400 students.

Table 2 Student Transportation Survey Decima Allen Elementary School Traffic and Parking Study – San Bruno	
Transportation Mode	Percent
Drive	92%
Carpool	2%
Ride bike	1%
Walk	4%
School Bus	1%
Others	---
Usual drop-off/ pickup areas	
---Curbside in front of school	27%
---Curbside along West Angus Ave.	18%
---Curbside along Elm Ave.	17%
---Curbside along Linden Ave.	9%
---Other locations	29%
Note: The survey was conducted by school staff in mid-December 2019 before the winter break.	

2.3 Study Area Description and School Access

Decima Allen Elementary School is located in a primarily residential neighborhood. Access to and from the school is via West Angus Avenue, Elm Avenue, Linden Avenue, and Jenevein Avenue. El Camino Real provides regional access to and from the area. Below is a brief description of these streets in terms of land use, traffic control, daily average traffic volumes, parking, and speed limits.

West Angus Avenue

West Angus Avenue is a two-way residential street running in an east-west orientation in the vicinity of Allen School. It measures about 28 feet wide and parking is permitted on both sides of the street except along the frontage of Allen School, which is painted white for school drop-off and pickup only. A section of the street east of Linden Avenue is designated for Library parking. Land use is mostly single-family homes except Allen School and the San Bruno Library. There is no speed limit posted in the vicinity of the school, but is presumed 25 mph as residential streets. Its intersections at Elm Avenue and Linden Avenue are controlled by 4-way stop signs. The daily traffic volume near the school is about 730 vehicles.

Elm Avenue

Elm Avenue is a two-way residential street running in a north-south orientation connecting West Angus Avenue in the north and Jenevein Avenue in the south. It measures about 28 feet wide and the land use along the street is mostly residential except for the Allen School, near the intersection with West Angus Avenue, and the San Bruno Park School District buildings and a kindergarten-daycare facility near Jenevein Avenue. Parking is permitted on both sides of the street except near the school. There are no posted speed-limit signs along the street but the limit is presumed to be 25 mph as a residential street. Its intersection at Jenevein Avenue is controlled by a 2-way stop sign. The daily traffic volume recorded near the school is about 1,050 vehicles.

Linden Avenue

Linden Avenue is a two-way residential street running in a north south direction. The land use along the street is mostly residential south of the Allen School. The San Bruno City offices, library, fire station and a City parking lot are located on the east side of the street across from Allen School. Parking is permitted on both sides of the street but has time restrictions near the school and the City offices. Its intersection at Jenevein Avenue is controlled by a 2-way stop sign. There are no posted speed limit signs but the limit is presumed to be 25 mph as a residential street. The daily traffic volume recorded just south of the City offices is about 700 vehicles.

Jenevein Avenue

Jenevein Avenue in the study area is a two-lane arterial street running in an east-west direction, connecting El Camino Real in the east near Freeway 280 but has no ramp access to or from the freeway. The land use along the street is mostly residential, while the section near El Camino Real (ECR) is mostly commercial. Parking is permitted on both sides of the street but is restricted east of Linden Avenue near El Camino Real. There are no posted speed limits signs but the limit is also assumed to be 25 mph as a residential street. The daily traffic volume recorded at a location near the San Bruno Park School District Administration Building is about 5,730 vehicles. Its intersection at Elm and Linden Avenue are controlled by 2-way stop signs plus pedestrian warning signs.

El Camino Real (ECR)

El Camino Real is a six-lane divided arterial road. It runs in a north-south direction connecting cities of South San Francisco to the north and San Mateo in the south and beyond. Its intersection at Jenevein Avenue is controlled by traffic signals. Its intersection at West Angus Avenue is a 3-way right-turn only intersection in the southbound direction. On-street parking is restricted to designated areas. There are no speed limited signs posted near the study area but the observed speed is about 40 mph. According to Caltrans record, the average daily traffic volume near San Bruno Avenue is about 45,000 vehicles per day.

2. 4 Public Transit Service

SamTrans provides public bus service in San Bruno and other cities in the Peninsula. Route 141 travels between the Airport and the Peninsular High School in San Bruno, and has bus stops in front of the San Bruno Park School District Building on Jenevein Avenue. Route ERC provides regional public transit service mainly along El Camino Real and has a bus-stop near the San Bruno City Offices and Public Library.

2. 5 Bicycle and Pedestrian Facilities

There are no bike lanes in the study area. Pedestrian sidewalks are provided throughout the neighborhood near Allen School. There are limited bicyclist and pedestrian activities near Allen School on West Angus Avenue, Elm Avenue, and Linden Avenue except during school drop-off and pickup times, when parents are walking with their children to and from school, and a small number of residents walking their dogs. Pedestrian activities are more noticeable on Jenevein Avenue near the intersection at El Camino Real, particularly during school times.

3. Current Study Area Traffic Conditions

To identify the impact of the Project, PHA first evaluated the current traffic operations and LOS within the study area to establish a baseline. The baseline traffic LOS evaluation was conducted based on traffic counts collected for the study intersections in early December on a Tuesday and a Wednesday during school drop-off and pick-up times (7:30-9:00 a.m. and 2:30 -3:45 p.m. respectively), to capture peak school traffic.

3.1 Current Study Intersection Traffic Operations (LOS)

The Level-of-Service (LOS) is a scale for ranking traffic operation and the quality of flow. Briefly, LOS A represents good flow condition with very little traffic delay. LOS D and E generally represent near or at capacity and traffic delays would be long. LOS F represents “Fail” conditions, and traffic delays and congestion levels would be excessive.

City of San Bruno LOS Significance Thresholds

General Plan Policy Basis:

Two policies in the San Bruno General Plan address level of service in the City of San Bruno.

1. San Bruno General Plan Policy T-6 and Figure 4-2 identify 28 intersections at which the LOS standard is D during AM and PM peak periods.
2. San Bruno General Plan Policy T-B requires that an acceptable LOS be maintained on the City’s street network.

Level of Service Standard:

The minimum acceptable Level of Service in the City of San Bruno is LOS D.

Traffic Impact Significance Threshold:

When evaluating development projects to determine if a significant impact will occur the following significance thresholds shall be applied.

Signalized Intersection. A significant traffic impact occurs if for a peak hour:

1. The level of service falls from LOS D under the existing condition to LOS E or F under the existing plus project conditions; or
2. The level of service is LOS E or F under existing conditions and the addition of the project trips would cause the critical movement delay at the intersection to increase by four or more seconds; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Unsignalized Intersection. A significant traffic impact occurs if for a peak hour:

1. The intersection of a stop-controlled approach falls from LOS D or better under existing conditions to LOS E or F; or
2. The level of service is LOS E or F under existing conditions; and the project would add 10 or more vehicle trips to the critical movement of the stop-controlled approach during the peak hour, and the intersection meets the California Manual on Unified Traffic Control Devices (CAMUTCD) Peak hour volume traffic signal warrant during the peak hour; or
3. The level of service would be LOS E under cumulative plus project conditions.

Traffic Improvements:

Improvements to address significant traffic impact that occur as a result of existing plus project conditions are expected to be implemented at the time of occupancy. Depending on the situation, the applicant may be required to pay as much as the full cost of the improvements. Improvements to address significant traffic impacts associated with the cumulative plus project conditions are not required until a later date. The applicant may be required to pay for their fair share of the improvement.

Table 4 shows the criteria and description of traffic conditions for the corresponding LOS grades. The City of San Bruno minimum traffic LOS standard is LOS D but residential street intersection traffic generally should maintain at LOS better than C. Table 3 shows the current traffic LOS for the study area intersections and ranking criteria.

The traffic operations and LOS analysis results indicated that all study intersections currently operated at acceptable (good) conditions (LOS A), while the Jenevein Avenue and El Camino Real intersection operated at LOS C for both a.m. and p.m. school peaks. These operational LOS are indicative of good traffic flow quality in the area. However, the queuing analysis indicated there are vehicle queues at the eastbound approach at the El Camino Real/Jenevein intersection, which occasionally would extend past Linden Avenue. San Bruno City staff also indicated Elm Avenue residents near the School District Building had concerns with traffic near the adjacent daycare/kindergarten center. Figure 4 shows the study intersection traffic volumes during school peak times. Figure 5 shows current daily traffic volumes.

3.2 School Drop-off and Pickup

The school has a parking lot for staff only; student drop-off and pick-up are accommodated along the curbside in front of the school on West Angus Avenue. The entire school frontage on the south side of West Angus Avenue is painted white for drop-off and pick-up. During site observation, the drop-off and pick-up activities appeared smooth and orderly without backups or congestion. School staff were supervising and assisting students and parents crossing at the West Angus Avenue intersections with Elm and Linden Avenues.

Table 3 Current Conditions (2019) Traffic LOS Summary
Decima Allen Elementary School Traffic and Parking Study – San Bruno

Study Intersections and Driveways		Traffic Control	Study Peak Periods	Existing (2019) Conditions			Unacceptable Condition
				Delays	LOS	Vehicle Queue	
1	Elm Ave. & Angus Ave.	AWS	AM	7.6	A	0/0/0/0	No
			PM	7.4	A	0/0/0/0	No
2	Angus Ave. & Linden Ave.	AWS	AM	7.6	A	0/0/0/0	No
			PM	7.5	A	0/0/0/0	No
3	Elm Ave. & Jenevein Ave.	SSS	AM	2.9/17.8	A/C	0/0/0/0	No
			PM	2.4/13.9	A/B	0/0/0/0	No
4	Linden Ave. & Jenevein Ave.	SSS	AM	1.7/15.1	A/C	0/0/0/0	No
			PM	2.3/14.0	A/B	0/0/0/0	No
5	El Camino Real. & Jenevein Ave.	Signal	AM	24.5	C	5/4/3-7/1-6	No
			PM	21.5	C	3/1/3-5/2-5	No
6	Linden Ave. & New School Driveway	SSS	AM	N.A.	N.A.	N.A.	No
			PM	N.A.	N.A.	N.A.	No

Notes:

Traffic count conducted In early December, 2019

SSS=Side-Street-Stop (2-way stop),AWS=All-Way-Stop, Signal=Traffic Signal Light

For AWS intersection: delays and LOS are reported for the intersection as a whole. Queuing is report by the number of vehicles by approach E/W/N/S.

For SSS intersections: Delays and LOS are report as: intersection delay/worst of two side street approach delay. Queuing is reported by the number of vehicles by approach E/W/N/S.

For signalized intersection: Delay and LOS are reported for the intersection as a whole. Queuing is reported by the number of vehicles by approach and lane group, E/W/N Left-N Thru/S Left-S Thru (right turn is not reported).

Table 4 Traffic Operation (LOS) Ranking Criteria Decima Allen Elementary School Traffic and Parking Study – San Bruno	
Signalized Intersections (HCM 2000 and 2010 Methodology)	
LOS	Control Delays per Vehicles in Seconds
A	0.0-10.0
B	10.1-20.0
C	20.1-35.0
D	35.1-55.0
E	55.1-80.0
F	>80.0
Non-signalized Intersections (HCM2000and 2010 Methodology)	
LOS	Control Delays per Vehicle in Seconds
A	0.0-10.0
B	10.1-15.0
C	15.1-25.0
D	25.1-35.0
E	35.1-50.0
F	>50.0
Source: Highway Capacity Manual 2000, 2010. Control delay includes delays of initial deceleration, move-up-time in the queue, stops, and re-acceleration. Calculated LOS is for minor street approaches. Major street traffic movements would operate at good LOS, as they do not have traffic control.	



Figure 4 Current (2019) Intersection Peak Hour Traffic Volumes - am vol. (pm vol.)
 Decima Allen Elementary School Traffic and Parking Study – San Bruno

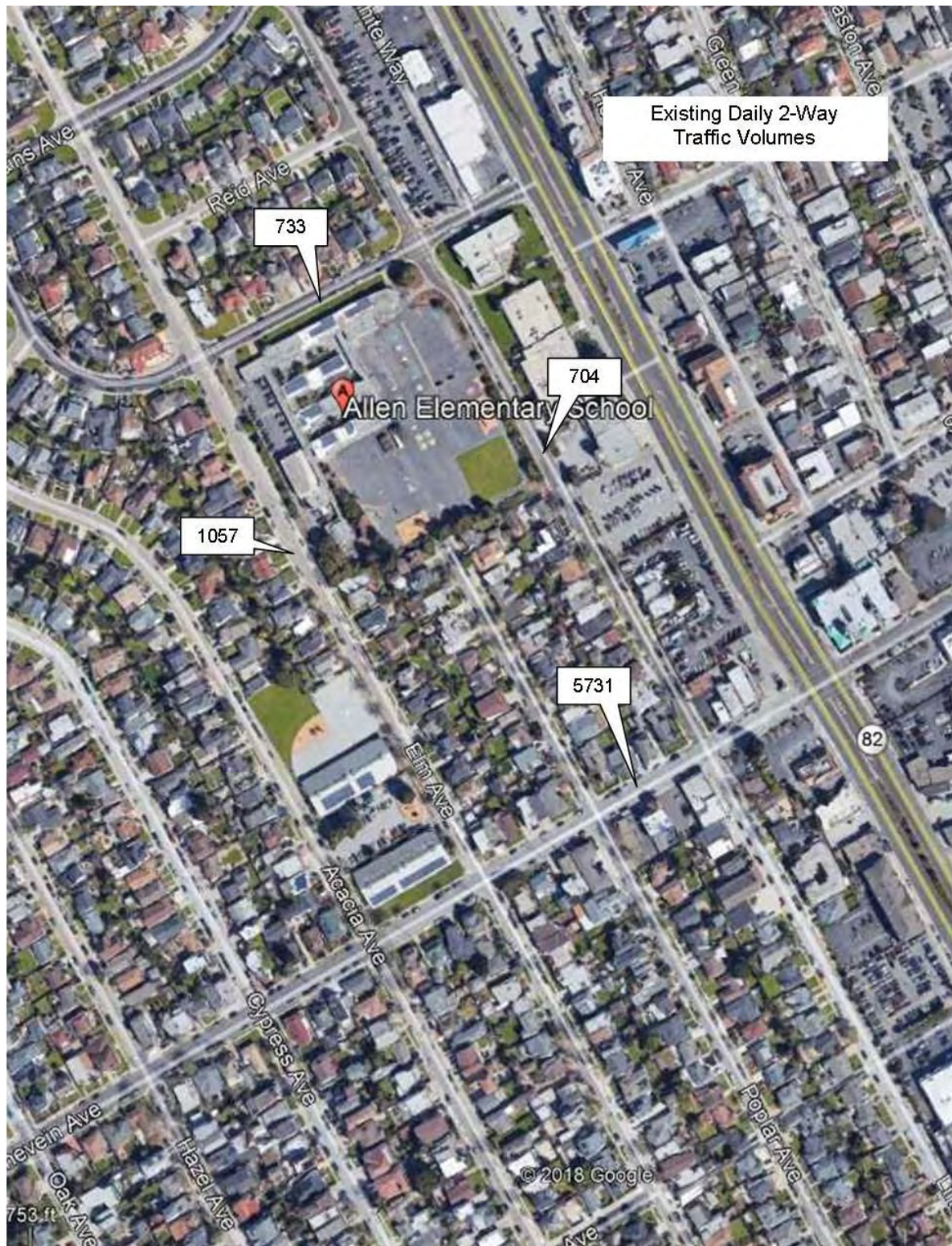


Figure 5 Current (2019) Study Area Daily Traffic Volumes
Decima Allen Elementary School Traffic and Parking Study – San Bruno

3.3 Traffic Safety Review

PHA conducted a traffic safety review of the study area to identify potential collision hotspots according to collision statistics obtained from SWITRS (Statewide Integrated Traffic Records System), a CHP database that collects and processes data gathered from collision scenes.

There were 18 reported collisions over the past three years between 2016 and 2018 in or near the study area. Most of the collisions occurred at or near intersections at Jenevein Avenue and El Camino Real, both of which are arterial roads. There were no reported collisions on West Angus Avenue, Elm Avenue, and Linden Avenue near Allen School. Collision data also shows that none of the reported collisions occurred during the school drop-off and pick-up times.

While there were no reported collisions near the school, traffic collision appears trending upward; 3 cases in 2016, 6 in 2017 and 9 in 2018. None of these collisions were fatal. Figure 6 shows the locations where these collisions occurred for the past three years. A more detailed analysis of the collisions showing the collision factors, type of collision, time of days, etc. is included in the technical appendices.



Figure 6 Traffic Collisions in the Project Area (2016-2018)
Decima Allen Elementary School Traffic and Parking Study – San Bruno

4. Traffic Impact Analysis

4.1 Project Condition Scenario

The project conditions assume the replacement school is complete and with capacity students. As indicated earlier, the school currently has about 400 students enrolled. The new school is expected to add about 100 students and could generate 200 trips in the morning and 150 trips in the afternoon based on a worst-case scenario analysis. It should be noted that while the school will add about 100 students, about 75 of them, kindergarteners, will be relocated from its current location on Elm Avenue next to the District building. In essence, the new school will only add about 25 new students.

4.2 New School Site Configuration

As shown in the new school site plan (see Figure 2), the administration building and classroom buildings will be relocated from along West Angus Avenue and Elm Avenue to the side of Linden Avenue.

The staff parking lot will be relocated from near the West Angus Avenue/Elm Avenue intersection to the southeast portion of the school site, and the number of staff parking spaces will increase from 30 to 34 to provide for the anticipated addition of teaching staff as a result of increased student capacity. The ball fields and play fields will be relocated from the east side of the site near Linden Avenue to the west side near Elm Avenue. The drop-off and pick-up area will remain on the West Angus Avenue side, but will be located within the school property and will have two traffic lanes.

4.3. School Traffic Generation and Directional Distribution

The new school will have an increased capacity from about 400 to about 500 students. However, as indicated above, 75 of the 100 new students are already in the area to be relocated from the nearby Hesselgren facility on Elm Street near the School District building. In essence, the net increase is 25 students. In estimating school traffic generation, two scenarios were considered; First, based on the average rates from the "ITE Trip Generation Manual", which is the industry standard for trip generation analysis; second, based on the site-specific parent/student transportation survey results, comparing the two-scenario analysis, trips estimated based on the site-specific survey are higher and therefore that estimate is used in the study for a conservative, worst-case approach. Table 5 shows the estimated school traffic generation comparing the current and future conditions, and Table 6 presents the directional distribution of the added school traffic. The trip directional distribution is estimated based on the area street layout, current traffic circulation, and land use patterns in the area.

Table 5 “Project” Trip Generation Analysis
 Decima Allen Elementary School Traffic and Parking Study-San Bruno

Current and Proposed Uses	Student	AM Peak- Hour Trips			PM Peak-Hour Trips			Average Daily Trips		
		Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
Proposed Decima Allen Elementary School (ITE code 520)	520	129	105	234	97	79	176	335	335	670
Current Decima Allen Elementary School (ITE code 520)	410	101	83	184	76	62	138	265	265	530
Net increase based on ITE rates	110	28	22	50	21	17	38	70	70	140
Net increase based on Allen School Based on parent survey (worst case)	110	99	99	198	74	74	148	173	173	346
<p><u>ITE Trip Generation Manual (9th Edition)</u> Rates for elementary school (ITE 520): Weekday daily rate 1.29/Student, 50% in, 50% out, am peak hour rate, 0.45/student, 0.55% in, 45% out, school pm peak hour rate, 0.30/student, 45% in, 55% out School pm peak rates are not based on adjacent street rates, but are based on 75% of am trips as 25% students are currently enrolled in after school programs. Parent survey indicated about 90% of the student was driven to school. Therefore, it's assumes for the worse case that 90% of the added student will be driven during the am dropped off time. For the pm pick-up time, 25% of the 100-110 added students will stay for after school programs. In the study, the traffic LOS calculations use the worst-case trip generation based on parent survey results to assume a conservative scenario</p>										

Table 6 School Traffic Directional Distribution Decima Allen Elementary School Replacement Traffic and Parking Study		
Direction	Via Streets	Percent
West	Angus Avenue	10
North	Angus and Elm Avenue	20
North	Angus and Linden Avenue	20
East	Angus Avenue and El Camino Real (N)	5
Southeast	Angus, Linden, and Jenevein	5
South	Angus, Linden, Jenevein, and El Camino Real (S)	5
South	Angus and Linden Avenue	5
South	Angus and Elm Avenue	10
Southwest	Angus, Elm, and Jenevein (W)	20
Total		100%
Traffic directional distribution is estimated based on current traffic circulation, land use patterns, and street network layout.		

4.4 Traffic Operational LOS Analysis with the Increased School Traffic

For the project-condition scenario, study intersection traffic operational LOS was evaluated with the added students resulting from the added school capacity. Results indicated that all of the study intersections will operate at the same LOS as at present, indicating the added student will not have a significant impact on area traffic operations. Table 7 summarizes the project condition scenario traffic LOS, delays, and vehicles queues. Figure 7 shows the current condition with the added “Project” traffic.

Table 7 Current Conditions + Project Traffic LOS Summary

Decima Allen Elementary School Traffic and Parking Study – San Bruno

Study Intersections		Traffic Control	Study Peak Periods	Existing (2019) Conditions			Existing (2019)+Project Conditions			Significant Impact
				Delays	LOS	Vehicle Queue	Delays	LOS	Vehicle Queue	
1	Elm Ave. & Angus Ave.	AWS	AM	7.6	A	0/0/0/0	8.1	A	0/0/0/0	No
			PM	7.4	A	0/0/0/0	7.6	A	0/0/0/0	No
2	Angus Ave. & Linden Ave.	AWS	AM	7.6	A	0/0/0/0	7.9	A	0/0/0/0	No
			PM	7.5	A	0/0/0/0	7.7	A	0/0/0/0	No
3	Elm Ave. & Jenevein Ave.	SSS	AM	2.9/17.8	A/C	0/0/0/0	4.0/18.7	A/C	0/0/0/1	No
			PM	2.4/13.9	A/B	0/0/0/0	3.1/14.4	A/B	0/0/0/0	No
4	Linden Ave. & Jenevein Ave.	SSS	AM	1.7/15.1	A/C	0/0/0/0	2.2/16.2	A/C	0/0/0/0	No
			PM	2.3/14.0	A/B	0/0/0/0	2.4/14.2	A/B	0/0/0/0	No
5	El Camino Real. & Jenevein Ave.	Signal	AM	24.5	C	5/4/3-7/1-6	24.8	C	6/4/3-7/2-6	No
			PM	21.5	C	3/1/3-5/2-5	22.0	C	3/3/3-6/2-5	No
6	Linden Ave. & New School Driveway	SSS	AM	N.A.	N.A.	N.A.	1.3/9.2	A/A	0/0/0/0	No
			PM	N.A.	N.A.	N.A.	2.1/9.2	A/A	0/0/0/0	No

Notes:

Traffic count conducted In early December, 2019

SSS=Side-Street-Stop (2-way stop),AWS=All-Way-Stop, Signal=Traffic Signal Light

For AWS intersection: delays and LOS are reported for the intersection as a whole. Queuing is report by the number of vehicles by approach E/W/N/S.

For SSS intersections: delays and LOS are report as: intersection delay/worst of two side street approach delay. Queuing is reported by the number of vehicles by approach E/W/N/S.

For signalized intersection: intersection delay and LOS as a whole. Queuing is reported by the number of vehicles by approach and lane group, E/W/N Left-N Thru/S Left-S Thru (right turn is not reported).

LOS D is the minimum standard for the City of San Bruno.



4.5 New Drop-off and Pick-up Lane Operation Analysis

The current student drop-off and pick-up occurs along the painted curbside on West Angus Avenue along the school frontage. The proposed drop-off and pick-up lane will remain at West Angus Avenue but will have two internal traffic lanes within the school property (see Figure 2). Student drop-off and pick-up activities will be contained within the school property instead of along the curbside on West Angus Avenue. This will make it easier for parents driving from the east direction to turn into the drop-off lane. With the current drop-off and pick-up along the street curb, parents coming from the east must make a three-point turn on West Angus Avenue to be able to park in front of the school.

The new drop-off and pick-up lanes measured about 300 feet long and 11 foot wide. According to research and surveys performed at five middle and elementary schools by Hatch Mott Macdonald, a North America Engineering Design Firm indicated that about 1.6 to 2.0 feet of queuing space should be provided for each enrolled student in designing the drop-off lane; research conducted by North Carolina Department of Transportation indicated 1.65 feet per student; and research conducted by The Texas Transportation Institute indicated 1.5 feet per student.

For the purposes of the study, four scenarios were considered in evaluating the drop-off lane operations:

1. Assumed all 500 students were to be dropped-off and picked up at one dismissal time,
2. Assumed 400 students to be dropped-off and picked-up at one dismissal time as 100 kindergarteners will be dropped-off/picked up at an earlier time,
3. Assumed 300 students to be drop-off/pick up at one dismissal time as 100 kindergarteners to be drop-off/pick up at an earlier hour and another 100 students (25% per school data) will stay for the after-school programs and will be picked-up at a later hour,
4. Assumed 180 students (60% of the 300 students) to be pick-up and at one dismissal time. According to the student/parent survey, only 27% percent uses the curb lane to drop-off and pick up their kids while other would drop-off and pick up at adjacent street. The 60% assumes more parents will use the improved drop-off area, while some will prefer using adjacent streets for drop-off and pick up out of convenience.

All of the above scenarios were first evaluated based on one drop-off lane, assuming the second lane will be used for passing, and then also evaluated assuming both lanes will be used for drop-off and pick-up. Table 8 shows the results of the analyses based on the above scenario assumptions.

Table 8 Drop-off/Pickup Lane Evaluation Decima Allen Elementary School Replacement Traffic and Parking Study				
# Student	Recommended Lengths		Provided	
	@ 1.5 Feet/Student	@ 2.0 Feet/Student	One-lane	Two-lane
500+/-	750	1000	300	600
400+/-	600	800	300	600
300+/-	450	600	300	600
180+/-	270	360	300	600
School hours: Kindergartener begin 8:25 am, end 12:30 pm Grades 1-3 begin 8:25 am, end 2:46 pm Grades 4-5 begin 8:15 am, end 2:46 pm After School Programs begin 3:00 am, end 6:00 pm				

Assuming a worst-case scenario, with all 500 students to be drop-off and pick up at the new drop-off lanes at one single time point, the recommended drop-off lane should be about 750 feet long based on 1.5 feet per student, or 1,000 feet long assuming 2.0 feet per student and the provide drop-off lanes would be short. This scenario, however, is not expected to occur as different classes have different starting and dismissal times. Based on the current school operational hours and drop-off characteristics, the number of students expected to use the new drop-off lanes at a single time point would be between 180 and 300 students. In that case, the new drop-off lanes would be adequate.

It may be beneficial to retain the current white curb on the street frontage for additional drop-off and pick up for future school bus use. However, the curb near the drop-off lane exit should be restricted for parking so as not to block the line of sight for vehicles exiting from the drop-off area. According to the site plan, the sidewalk along the current curb lane between the proposed entrance and exit to and from the new drop-off area would be 6 foot wide to accommodate safe student drop-offs.

In any event, it is recommended that school staff be present during drop-off and pickup times to direct traffic and assist parent and students.

4.6 Staff Parking and Driveway Analysis

As shown in the site plan, the new staff parking lot will be relocated to the southeastern corner of the school site with a single driveway providing for inbound and outbound traffic. The lot will have 34 parking spaces, increase from 30 to provide for the additional teaching staff. There are no dimensions on the site plan, the drive aisle and parking stall design and

dimension should consult City of San Bruno standards. A 24 feet wide driveway and drive aisle would be preferred. The school would develop a drop-off and pick-up plan, direct parents to drop-off and pick up their students at the drop-off zone at West Angus Avenue, indicating no drop-off should take place at the staff parking lot. The plan would also provide detailed procedures, travel routes and distribute it to parents to follow.

4.7 Cumulative Scenario Traffic Analysis

According to data obtained from the City website, there is one proposed project that may have traffic effects overlapping those of the project. This is the "Mills Park", a mixed-use development to be located at the northeast corner of Linden Avenue and Angus Avenue, replacing the existing PG&E site.

Based on the data obtained from the Mills Park traffic report, the project is expected to generate 229 and 234 morning and afternoon peak-hour trips respectively. The report indicated that the project will not have access driveways at Angus and Linden Avenue, and will not impact the study intersections near Decima Allen School.

The project, however, will add 50 trips to the intersection of El Camino Real and Jenevein Avenue during the a.m. peak hour (20 trips in the northbound direction and 30 trips in the southbound direction). During the afternoon peak hour, the project is expected to add 52 trips to the intersection (29 trips in the northbound direction and 23 trips in the southbound direction).

Traffic from the Mills Park project traffic, however, would not impact school traffic operation as school traffic peaks between 2:30 and 3:30 p.m. whereas the Mills Park traffic peaks during the normal 4-6 pm commute hours. The El Camino Real and Jenevein Avenue intersection currently operate at LOS C with and without the school traffic. With the addition of the Mills Park traffic and the increased peak school traffic, the intersection will continue to operate at LOS C.

5. Parking Analysis

5.1 Parking Survey and Analysis

PHA conducted a parking study to evaluate current study area parking conditions. The objective is to identify whether or not there is adequate parking space in the area to accommodate parent parking during school drop-off and pickup times.

The parking study area includes Elm Avenue, West Angus Avenue, Linden Avenue, and Reid Avenue. The study area is subdivided into 6 study blocks for survey purposed. Figure 8 shows the parking study area. Table 9 shows a description of the study blocks in terms of lengths and estimated capacities for parking.

Parking spaces in the study area are not striped. To determine the parking capacity for the study area, PHA first measured the length of each study block, subtracting all driveways, painted curbs, and any curb space under 12 feet, based on measurements in the field, then divided it by a factor of 20 feet (the length of a standard parking space) to arrive at the estimated parking capacity per block. Overall, our analysis indicated the entire study area has the capacity to accommodate parking for 245-248 cars.

During the survey, parked cars at each block were counted at the designated hours at 7, 8, and 9 a.m., and again at 2, 3, and 4 pm on a normal school day to capture the on-street parking demand from parents during school peak times. Subtracting the number of parked cars from the estimated parking capacities at each block yields the number of free parking spaces.

Survey results indicated the study area as a whole has an estimated capacity to accommodate 248 +/- cars. Parking peaks between 2 and 3 p.m. with a total of 166 parked cars counted in the entire study area, representing an occupancy rate of 60%. For survey blocks B, C, and D, which the closest blocks to the school and are most likely occupied by parents when picking up their students, peak parking demand also occurs at 3 p.m. A total of 92 parked cars were counted out of an estimated capacity for 123 cars, representing occupancy of 75%.

In summary, there are 123 free spaces at 2 p.m. and 79 at 3 p.m. available within the study area to accommodate parent parking needs during peak pickup times. Based on field observation, parking near the school site did not appear to be a problem. With the improved internal drop-off lanes on West Angus Avenue, it appears the available parking space should be able to accommodate the added parking demand. Table 10 shows the hourly parking counts by the block. Figures 9 graphically present the level of parking saturation in the study area.



Figure 8 Parking Study Blocks
Decima Allen Elementary School Traffic and Parking Study – San Bruno

Table 9 Parking Survey Area Description and Capacity Estimates

Decima Allen Elementary School Traffic and Parking Study

Survey Block	Block Length in Feet (X)	Driveways/Painted Curbs in Feet (Y)	Estimated Parking Capacity (X-Y)/20' (Stall Length)	Parking Survey Block Descriptions
A	1880	-795	54.3	Portions of Elm Ave. Linden Ave. and Reid Ave.
B	2060	-770	64.5	Angus Ave. and portions of Elm and Linden Ave.
C	940	-510	21.5	Linden Ave. between Angus and the southern edge of school
D	960	-185	38.8	Elm Ave. between Angus and the southern edge of school
E	1120	-550	28.5	Linden Ave. between southern edge of school and Jenevein Ave.
F	1120	-315	40.3	Elm Ave. between southern edge of school and Jenevein Ave.
Total	8080	2940	245-248~	

Note:

Block lengths are first measured from Google Earth aerial then verified in the field. Driveways, painted curbs, street corner radii, and any space too short to fit a passenger car were measured in the field and subtracted from the block length, and then divided by a factor of 20 feet (standard parking space length) to estimate the number of parking space for each study block.

Table 10 Study Area Parking Analysis
Decima Allen Elementary School Traffic and Parking Study-San Bruno

Survey Block	Available Spaces (Estimated)	7:00 AM		8:00 AM		9:00 AM		2:00 PM		3:00 PM		4:00 PM	
		Taken	Free	Taken	Free	Taken	Free	Taken	Free	Taken	Free	Taken	Free
A	54	21	33	25	29	24	30	26	28	27	27	21	33
B	64	27	37	32	32	27	37	30	34	61	3	29	35
C	21	3	18	10	11	9	12	10	11	12	9	12	9
D	38	20	18	33	5	18	20	8	30	19	19	11	27
E	28	21	7	23	5	24	4	25	3	23	5	23	5
F	40	28	12	27	13	25	15	23	17	24	16	22	18
Total	245	120	125	150	95	127	118	122	123	166	79	118	127
		49%	51%	61%	39%	52%	48%	50%	50%	68%	32%	48%	52%
BCD	123	50	73	75	48	54	69	48	75	62	31	52	71
		41%	59%	61%	39%	44%	56%	39%	61%	75%	25%	42%	58%

Note:

Survey block capacity calculations: Block length (both sides of the street minus X (painted curbs, driveways, the corner radius and any space that is too short to fit in a passenger car)/20'(standard parking space length)

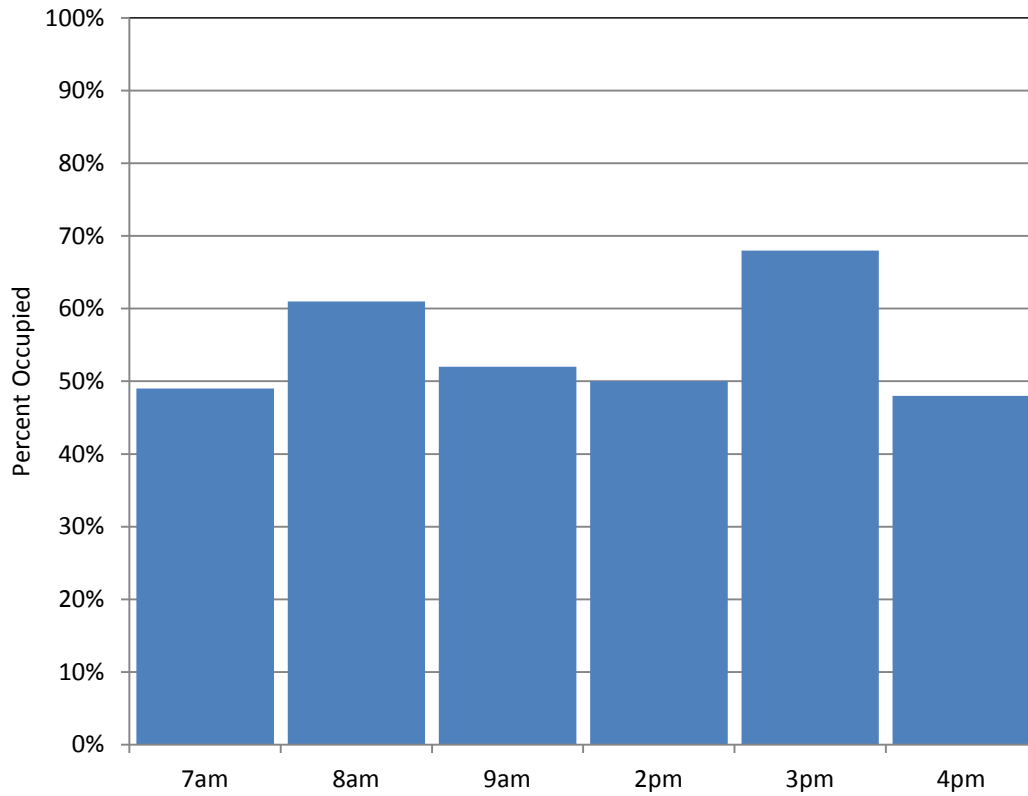
Taken: The space is occupied by a car.

Free: the space is available for parking.

Parking spaces "Taken" and "Free" may not add up to total 100% due to rounding.

PHA Conducted the parking surveys on 12/4/2019 (Wednesday)

Figure 9 Study Area Parking Saturation Analysis
Allen Elementary School Traffic and Traffic Analysis



6. Construction Traffic Impact Analysis

6.1 Construction Traffic Estimates

Based on the information provided by the construction management firm for the Project, the construction would occur in phases beginning in May 2021, and is expected to be completed by December 2022. Construction activities would include grading, construction of foundations, infrastructure, buildings, and landscaping. Below is a brief description of the construction phases and estimated schedules:

- 1) Grading/Site Preparation (5/31/21- 8/27/21)
- 2) Construction of New School except Library (6/28/21-7/15/22)
- 3) Demolition of Old School (6/6/22- 7/29/22)
- 4) Construction of New Library/Fields/Play Areas (6/27/22-12/16/22)

Equipment used during demolition and construction would vary by phase, but would include excavators, bulldozers, backhoes, dump trucks, haul trucks, graders, compactors, water trucks, and similar equipment. There would be up to 24 construction workers onsite on an average day. Approximately 1,000 truckloads (25 loads per day or 3 loads per hour on the average) are expected during the construction period. Most of the construction activities would occur between 7:00 am and 3:30 pm during the summer break. Some construction and demolition work may need to occur while school is in session. Table 11 shows the estimated traffic associated with the construction activities.

In the traffic LOS analysis, transport trucks were converted to passenger car equivalent (PCE) based on a factor of 1:3. Much of the construction traffic is expected to occur in the summer month. However, to assume a conservative approach, construction traffic was added to the study area intersection assuming school traffic is present.

6.2 Construction Traffic Distribution

Based on the layout of the area street system, it is assumed that transport trucks and construction crew will likely travel to and from either the north or the south to access the school site from areas outside of the study area via El Camino Real, in conjunction with Kains Avenue, or West Angus Avenue, and Linden Avenue. Transport trucks and construction crew traveling from the south via El Camino Real could make a left-turn at Kains Avenue, then on to Linden to access the current school site driveway at the corner of Linden and West Angus Avenue. This route would have least impact on the neighborhood. Secondly, it is assumed that 40 percent of the construction crew will access the site from the south via El Camino Real, Jenevein Avenue and then Linden Avenue to access the site. Table 12 shows the study intersection traffic LOS with the added construction traffic. Figure 10 shows current traffic volume plus construction traffic.

Table 11 Construction Traffic Generation Estimates
Decima Allen Elementary School Traffic and Parking Study-San Bruno

Estimated Daily Trucks and Construction Workers	AM Peak- Hour Trips			PM Peak-Hour Trips			Average Daily Trips		
	Enter	Exit	Total	Enter	Exit	Total	Enter	Exit	Total
Transport Trucks (25 loads daily)	4	4	8	4	4	8	25	25	50
Truck Passenger Car Equivalent (1:3)	12	12	24	12	12	24	75	75	150
Construction Crew (24 max. daily)	24	0	24	0	24	24	24	24	48
Total	36	12	48	12	36	48	99	99	198
<p>Note:</p> <p>The above trip estimates are made based on data provided by the construction contractor. Transport trucks are converted to passenger car equivalent (PCE) based on a factor of 1:3 for the traffic analysis.</p> <p>Construction crew is assumed to drive passenger vehicles, passenger van, and or SUVs individually and are all considered passenger vehicle in the study and no conversion is made. Transport truck traffic is expected to occur for about 40 days during summer while workers may continue working on the campus for short periods after school is open.</p>									

Table 12 Current (2019) Conditions + Construction Traffic LOS Summary

Decima Allen Elementary School Traffic and Parking Study – San Bruno

Study Intersections		Traffic Control	Study Peak Periods	Existing (2019) Conditions			Existing (2019) + Construction Traffic			Significant Impact
				Delays	LOS	Vehicle Queue	Delays	LOS	Vehicle Queue	
1	Elm Ave. & Angus Ave.	AWS	AM	7.6	A	0/0/0/0	7.6	A	0/0/0/0	No
			PM	7.4	A	0/0/0/0	7.4	A	0/0/0/0	No
2	Angus Ave. & Linden Ave.	AWS	AM	7.6	A	0/0/0/0	7.7	A	0/0/0/0	No
			PM	7.5	A	0/0/0/0	7.7	A	0/0/0/0	No
3	Elm Ave. & Jenevein Ave.	AWS	AM	2.9/17.8	A/C	0/0/0/0	2.9/17.8	A/C	0/0/0/0	No
			PM	2.4/13.9	A/B	0/0/0/0	2.4/13.9	A/B	0/0/0/0	No
4	Linden Ave. & Jenevein Ave.	SSS	AM	1.7/15.1	A/C	0/0/0/0	1.78/15.2	A/C	0/0/0/0	No
			PM	2.3/14.0	A/B	0/0/0/0	2.6/14.95.0	A (D)	0/0/0/0	No
5	El Camino Real. & Jenevein Ave.	Signal	AM	24.5	C	5/4/3-7/1-6	24.9	C	5/4/3-6/1-6	No
			PM	21.5	C	3/1/3-5/2-5	21.6	C	3/3/3-5/2-5	No
6	Linden Ave. & New School Driveway	SSS	AM	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	No
			PM	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	No

Notes:

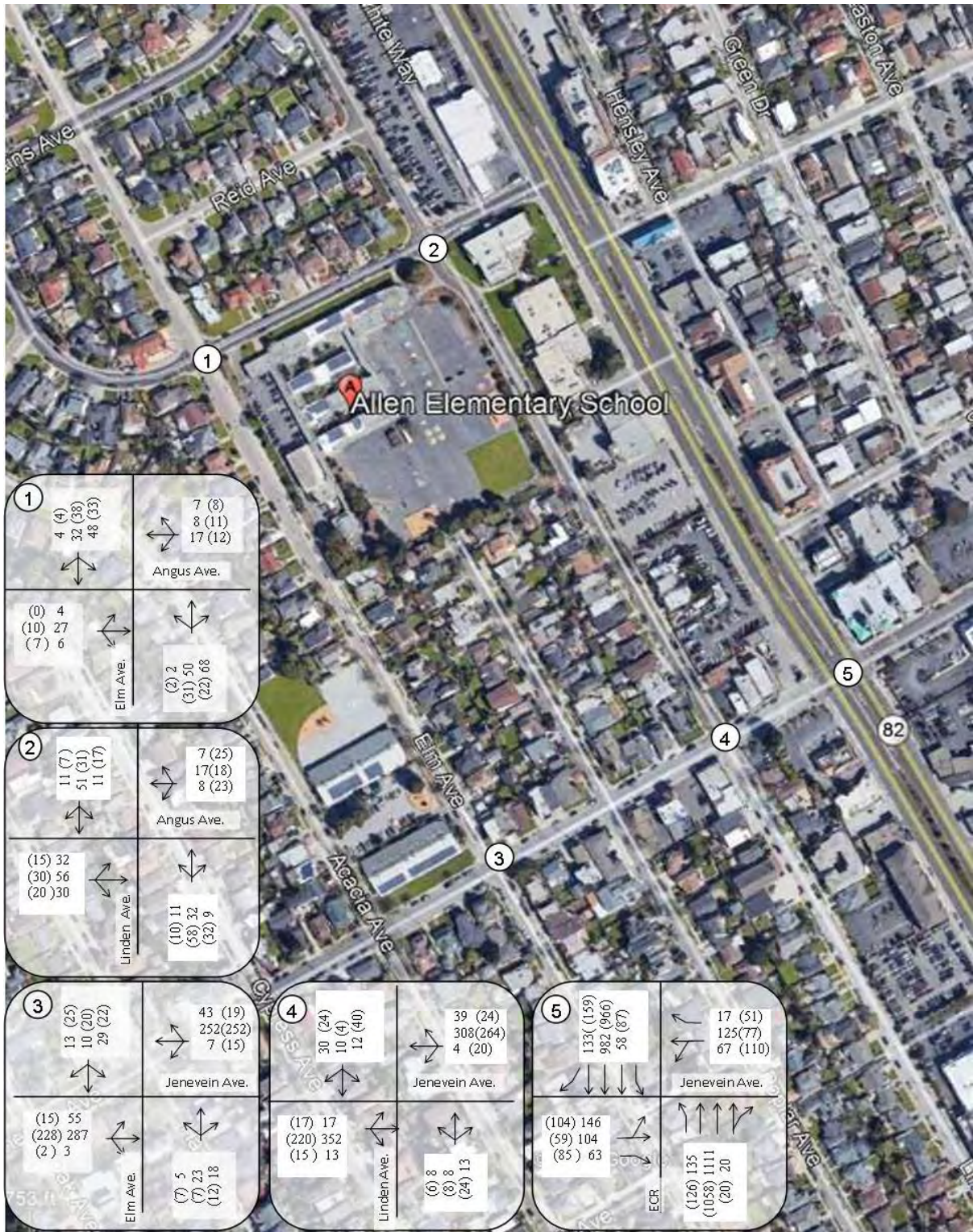
Traffic count conducted In early December, 2019

SSS=Side-Street-Stop (2-way stop),AWS=All-Way-Stop, Signal=Traffic Signal Light

For AWS intersection: delays and LOS are reported for the intersection as a whole. Queuing is report by the number of vehicles by approach E/W/N/S.

For SSS intersections: delays and LOS are report as: intersection delay/worst of two side street approach delay. Queuing is reported by the number of vehicles by approach E/W/N/S.

For signalized intersection: intersection delay and LOS as a whole. Queuing is reported by the number of vehicles by approach and lane group, E/W/N Left-N Thru/S Left-S Thru (right turn is not reported).



7. Conclusions and Recommendations

7.1 Summary

The proposed replacement school would likely add about 100 students, and could add 198 and 148 a.m. and p.m. trips respectively to the study based on a highly conservative assumption. The school currently has about 400 enrolled students. Field observations during school peak times indicated there are no traffic circulation or operational issues near the school site currently. It should be noted that while the school will add about 100 students, about 75 of them, kindergarteners, will transfer from its current location on Elm Avenue next to the District building. Therefore the new school will only add about 25 net new students to the area.

The traffic study evaluated traffic operational LOS at 5 intersections around the school site to identify the potential impact of the added school traffic. Results indicate that all of the study intersections currently operated at acceptable LOS C or better conditions and will continue to do so with the additional school traffic, and under cumulative development conditions.

The proposed internal drop-off and pick-up lane will improve drop-off and pickup operations as drop-off and pick up will occur within the school property and will have a smaller impact on West Angus Avenue compared to the current conditions.

Traffic safety review for the area indicated that there were 18 reported traffic collisions near the study area during the past three years (2016-2018). Most of them occurred near El Camino Real and Jenevein Avenue. There were no reported traffic collisions near the immediate area of the school site on West Angus, Elm, and Linden Avenues.

A parking study indicated the study area has the ability accommodate about 248 cars on the street. Parking demand peaks between 2 and 3 p.m., with a total of 166 parked cars counted in the entire study area, representing an occupancy rate of 60%. This means there will be about 100 spaces available for parents during school drop-off and pickup times. Parent parking needs for drop-off and pickup are short-term, taking about 10-15 minutes generally. Most parents are expected to use the new drop-off lane to drop-off and pick up their kids.

Most of the construction activities will occur during the summer but with some activities will need to be performed when school is in session. According to contractor provided data, a maximum of 24 construction workers may be needed at various construction stages, plus 3 to 4 truckloads (6-8 trips) of material hauling to and from the site on an hourly basis. The traffic associated with the construction will affect mostly the West Angus and Linden Avenue intersection and potentially some at the Linden and Jenevein Avenue Intersection. These added trips are not expected to change current traffic operational LOS in the area.

7.2 Recommendations

The replacement school as proposed will not create significant impacts in area circulation. The proposed internal drop-off and pickup lane will improve circulation and safety on West Angus Avenue. Below are our recommendations:

1. Assign staff to monitor drop-off/pick-up operations and assist parents as needed.
2. Continue to assign staff to supervise and assist students crossing at the West Angus intersections at Elm Avenue and Linden Avenue during drop-off and pick-up times.
3. Retain the current white curb along the school frontage on West Angus for additional drop-off and pick-up, and school bus access in the future.
4. Direct parents to drop off and pick up their students at the new drop-off area in front of the school at West Angus Avenue. Prohibit student drop-off and pick-up at the staff parking lot.

E. Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM – DECIMA ALLEN ELEMENTARY SCHOOL REPLACEMENT PROJECT

When adopting a Mitigated Negative Declaration, the CEQA Guidelines [Section 15074(d)] require that Lead Agencies adopt a program for reporting on or monitoring the changes that it has required in the project or made a condition of approval to mitigate or avoid significant environmental effects.

This monitoring program for mitigation measures identified by the Mitigated Negative Declaration includes:

1. A list of mitigation measures with a space for the completion date,
2. The full text of the mitigation measures, and
3. Monitoring details, including: 1) agency responsible for implementation, 2) timing of implementation and monitoring, and 3) monitoring verification.

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
<i>AESTHETICS</i>						
Change in views from nearby residences due to loss of trees	<i>Mitigation Measure AES-1:</i> A tree replacement plan shall be developed in consultation with the City's Arborist and implemented by the District. The proposed plan would include replacement of District-protected trees with large specimen trees. (24" or 36" box). A minimum 1 to 1 replacement shall occur, with 2 to 1 replacement if determined to be feasible by the Project landscape architect. To the extent feasible, mature native trees at the perimeter of the site (identified in the project's arborist report) shall be preserved.	Project arborist and/or landscape architect (consultation); SMUHSD Construction Contractor (implementation)	SMUHSD Project Manager	Plan development prior to removal of existing trees. Planting during landscape installation phase of construction.		
<i>AIR QUALITY</i>						
Impacts from construction-generated particulates	<i>Mitigation Measure AQ-1.</i> The Project construction contractor shall implement the following measures to further reduce construction-related diesel particulate exhaust emissions: <ul style="list-style-type: none"> All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements: All Project diesel-powered construction equipment shall have engines rated at least EPA Tier 3, with Tier 4 equipment substituted wherever possible to obtain the maximum possible DPM emissions reduction from Project equipment.	SMUHSD Construction Contractor	SMUHSD Project Manager	During construction activities		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date

BIOLOGICAL RESOURCES						
Loss of active protected bird nests from tree removal	<p>Mitigation Measure BIO-1: Wherever possible, any tree removal should occur during the period of September 1 to January 31, which is outside of the nesting season. If construction activities and/or tree removal would commence anytime during the nesting/breeding season of native bird species potentially nesting near the site (typically February through August in the project region), a pre-construction survey for nesting birds shall be conducted by a qualified biologist within two weeks of the commencement of construction activities. If construction during the nesting season ceases for more than 10 days or moves to a new locale on the site, nesting bird surveys shall be conducted prior to the restart of work.</p> <p>If active nests are found in areas that could be directly affected or are within 200 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance 50-foot buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged.</p>	SMUHSD Construction contractor	SMUHSD Project Manager/ Consulting Biologist	Condition of construction contract; field verify implementation prior to start of construction		
<i>CULTURAL RESOURCES</i>						
Potential impacts to archaeological deposits and human remains	<p>Mitigation Measure CULT-1: <i>Archaeological Deposits.</i> If an inadvertent discovery of cultural materials (e.g. unusual</p>	SMUHSD Project Manager	SMUHSD Project Manager	Construction contractors shall monitor during		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>amounts of shell, animal bone, bottle glass, ceramics, structure/building remains, etc.) is made during project-related construction activities, ground disturbances in the area of the find shall be halted within a 50-foot radius of the discovery and a qualified archaeologist must be retained to document the discovery, and assess its significance. The archaeologist shall determine whether the resource is potentially significant as per the CRHR and recommend treatment. Any recommended treatment shall be implemented.</p> <p><i>Mitigation Measure CULT-2: Human Remains.</i> In accordance with the California Health and Safety Code, if human remains are uncovered during ground disturbing activities all such activities in the vicinity of the find shall be halted immediately and the District or the District's designated representative shall be notified. The District shall immediately notify the San Mateo County Sheriff/Coroner and a qualified professional archaeologist. The Sheriff/Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety</p>			ground disturbing activities; if cultural resources are encountered, archaeologist and NAHC, as applicable, shall determine appropriate treatment for the resources.		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission by phone within 24 hours of making that determination (Health and Safety Code Section 7050[c]). The responsibilities of the District for acting upon notification of a discovery of Native American human remains are identified in detail in the California Public Resources Code Section 5097.9. The District or their appointed representative and the professional archaeologist shall consult with a Most Likely Descendent (MLD) determined by the NAHC regarding the removal or preservation and avoidance of the remains and determine if additional burials could be present in the vicinity. Construction activities shall not resume until either the human remains are exhumed, or the remains are avoided via Project construction design change.					
Impacts of project's proposed removal of National Register of Historic Places - eligible existing school buildings	A. Prepare HABS-style report. This report need not be in an official HABS format, but should include all of the information required in a HABS report, including:	Project architectural historian	SMUHSD Project Manager	Prior to demolition of any of the school buildings.		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> • Building name and location • Statement of Significance • Identify the author of the report; and identify the photographer, if different from the author • Statement explaining why this report has been produced • Dates of design and construction. Explain when the various buildings and covered walks were designed and built. Identify dates of major alterations. • Profiles of the architects, Masten & Hurd and James H. Mitchell. The existing historic evaluation contains most of this information, however additional illustrations of their works, especially from the late 1930s on, should be included. • Historical context: Schools in San Bruno. Photographs of the modern-era schools should be added to the history provided 					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>in the current architectural evaluation.</p> <ul style="list-style-type: none"> Changes in school design, 1900s-1950s. To the history that I related in my evaluation, a larger, nationwide perspective should be added. This part of the report should be illustrated with photographs of Streamlined Moderne and early International style (1930s-1950s) California schools. Additional historic information of Edgemont/Allen School, if such information is available at the school or at the school district's offices; this may include: <ul style="list-style-type: none"> A list of all of the school principals back to 1910, and the years they served, would be desirable. If any teachers received awards, or were especially beloved by the students, 					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>stating that would be desirable as well.</p> <ul style="list-style-type: none"> ○ A biographical sketch of Decima M. Allen, and a photograph of her if one is available. ● Physical description of the buildings and grounds, including some interior spaces. These would be described in more detail than what I wrote in my evaluation. Unit 1 would receive the most robust treatment. Units 2, 3, and 4 need not be described in as great detail, but differences between them and Unit 1 should be carefully described. The Administration Building, the Multipurpose Building, and the Kindergarten/Media Center should all be described in detail. The covered walks or breezeways, the front lawn, and the courtyards should be described sufficiently to indicate their general character. 					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> Photographs and plans of Edgemont/Allen School. Depending on your budget, these could be HABS-level archival b&w photographs; or high-density color digital photos printed and also on CDs. If the former, a professional photographer experienced in archival photography should be hired. These photos should be of: <ul style="list-style-type: none"> all four sides of Unit 1 and Unit 2 the south side of Unit 4 deck shots of the covered walks alongside of units 2, 3, or 4 ceiling detail of one of the above covered walks roofline detail window in Unit 1 showing altered sash 					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> ○ window in Unit 2, 3, or 4 showing original wooden sash ○ a typical steel door in units 1, 2, 3, or 4 ○ the hallway in Unit 1 ○ a typical classroom interior ○ all three visible sides of the Administration Building ○ original window in the north side of the Administration Building ○ all four sides of the All-purpose Building and the Kindergarten/Media Center. These may be taken as perspective views, capturing two sides in one shot. ○ interior of the All-purpose Building ○ ceiling of the All-purpose Building 					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> ○ the covered walk connecting the east sides of units 2, 3, and 4 ○ the covered walk along the west side, view looking east ○ the covered walk along the west side, deck shot ○ the lawn in front of Unit 1 ○ one or more of the courtyards between units 2, 3, and 4 ○ the paved playground • In addition to current photographs, the following illustrations should be used: <ul style="list-style-type: none"> ○ 1949 Sanborn map (in my historical evaluation) ○ current plot plan (in my historical evaluation) ○ photographs from original blueprints <p>This report should be placed in the following places:</p>					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> • San Bruno Public Library • San Mateo County Historical Archives, in the San Mateo County Museum • Environmental Design Library, Wurster Hall, University of California, Berkeley and/or • Documents Collection, College of Environmental Design, Wurster Hall, University of California, Berkeley <p>B. Additional Recommended Measures</p> <p><u>Preservation of Original plans</u></p> <p>The original blueprint drawings for the school survive. If the school district does not need them, selected sheets (elevations, plot plans, floor plans) could be offered to the Documents Collection, College of Environmental Design, Wurster Hall, University of California, Berkeley. Their preservation would be valuable because of the historical significance of this school's design.</p> <p><u>Preservation of a Fragment of the Original Building</u></p>					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	In front of the Administration Building there is a wall on which the name of the school is spelled in metal letters. Preservation of this wall could help to evoke the memory of this school if space is available on the grounds of the new building.					
<i>GEOLOGIC HAZARDS</i>						
Geotechnical Hazards	<p><i>Mitigation Measure GEO-1.</i> The project structures and foundations shall be designed in accordance with the most recent version of the California Building Code. Recommended seismic coefficients provided in the Miller Pacific geotechnical report shall be included in the project design.</p> <p><i>Mitigation Measure GEO-2.</i> The project's site clearing, site preparation, subgrade preparation and stabilization, fill, drainage, and foundation systems shall be designed and constructed per the specifications set forth on the project geotechnical report (Miller Pacific 2019).</p>	SMUHSD Project Manager	SMUHSD/ Project geotechnical engineer	Prior to submittal of final design plans to Division of the State Architect		
Drainage, Erosion., Sedimentation	<i>Mitigation Measure GEO-3.</i> The project shall include a site drainage system to collect surface water and discharging it into an established storm drainage system. The project Civil Engineer or Architect shall be responsible for designing the site drainage system and, an erosion control plan could be developed prior to construction per the	SMUHSD Project Manager	SMUHSD/ Project civil engineer	Prior to submittal of final design plans to Division of the State Architect		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date

	current guidelines of the California Stormwater Quality Association's Best Management Practice Handbook.					
<i>HAZARDS AND HAZARDOUS MATERIALS</i>						
Potential risk of soil and water contamination during construction	<i>Mitigation Measure HAZ-1.</i> Prior to demolition of buildings on the project site, a full asbestos and lead based paint survey of the buildings shall be performed by qualified asbestos and lead-based paint inspectors/consultants. If containing materials or lead-based paints are identified at any of the site buildings proposed for renovation and or demolition, standard asbestos and lead-based paint abatement and dust control measures shall be implemented in compliance with OSHA and Cal/OSHA statutes. This work shall be performed at a minimum with the controls and work practices described in Title 8 CCR 1532.1, which describes work, practices and respiratory protection. At a minimum, prior to demolition, any ACM and/or LBP shall be stabilized, and demolition of building materials that have potential contaminants be placed in appropriate covered containers prior to off-site removal to reduce the potential for airborne emissions. Similarly, the existing buildings shall be surveyed for PCB-containing equipment, light ballasts, and light tubes, and any such equipment shall be removed and disposed of appropriately prior to building demolition. All removal of	SMUHSD Construction Contractor	SMUHSD Project Manager	Prior to demolition of buildings on the project site		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	potentially contaminated materials shall be conducted only by qualified personnel with appropriate training and certifications.					
<i>HYDROLOGY AND WATER QUALITY</i>						
Impacts on Water Quality	<p><i>Mitigation Measure HYD-1:</i> Prior to the issuance of grading permits for the proposed Project, the Project engineers shall prepare a Stormwater Control Plan. The Stormwater Control Plan shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the Project site.</p> <p><i>Mitigation Measure HYD-2:</i> The District shall maintain in perpetuity the post-construction BMPs listed in the Stormwater Operations and Management Plan. The owner shall make changes or modifications to the BMPs to ensure peak performance. The owner shall be responsible for costs incurred in operating, maintaining, repairing, and replacing the BMPs. The owner shall conduct inspection and maintenance activities and complete annual reports.</p>	SMUHSD Project Manager	SMUHSD Project Manager/ Project Civil Engineer	Prior to submittal of final design plans to Division of the State Architect		
<i>NOISE</i>						
Construction Noise Impacts	<i>Mitigation Measure NOI-1:</i> The following noise-control Best Management Practices shall be incorporated into the construction documents to be implemented by the Project contractor:	SMUHSD Project Manager (incorporate into contracts)	SMUHSD Project Manager	Incorporate specifications into construction bid documents; implement during		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<ul style="list-style-type: none"> ○ Provide enclosures and noise mufflers for stationary equipment, shrouding or shielding for impact tools, and barriers around particularly noisy activity areas on the site. ○ Use quietest type of construction equipment whenever possible, particularly air compressors. ○ Provide sound-control devices on equipment no less effective than those provided by the manufacturer. ○ Locate stationary equipment, material stockpiles, and vehicle staging areas as far as practicable from sensitive receptors. ○ Prohibit unnecessary idling of internal combustion engines. ○ Designate a noise disturbance coordinator at the San Bruno Park School District who shall be responsible for responding to complaints about noise during construction. The telephone number of the noise disturbance 	SMUHSD Construction Contractor (implement during construction)		construction activities		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>coordinator shall be conspicuously posted at the construction site. Copies of the project purpose, description and construction schedule shall also be distributed to the surrounding residences.</p> <p>Mitigation Measure NOI-2: Further restrictions shall be placed on hours of Project construction activity than those allowed under the Municipal Code. Thus, construction activity shall be limited to weekdays between 7 AM and 6 PM, and prohibited on weekends and all holidays observed in the City of San Bruno.</p> <p>Mitigation Measure NOI-3: If at any times when school is in session that construction equipment needs to operate near on-site noise-sensitive school receptors (i.e., classrooms, staff offices, the library), the Project contractor shall consult with the school principal/faculty/staff to arrange for a temporary relocation of the said receptors to minimize disruption to educational activities while the work is completed.</p> <p>Mitigation Measure NOI-4: All heavy trucks delivering building supplies or off-hauling excavated soil or demolition debris shall exit the site to Linden Avenue and proceed directly to El Camino Real and on</p>					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>to area freeways, thereby avoiding residential areas facing Elm Avenue, Angus Avenue and any other neighborhood local streets.</p> <p>Mitigation Measure NOI-5. To assure that average interior noise levels within the new school's class rooms and library achieve the WHO-recommended indoor noise exposure standard of 35 dBA Leq during its operating hours, the new Project structure shall have sound-rated walls, windows and exterior doors adequate to achieve WHO noise standards. This shall be verified by a Project building-specific acoustical analysis by its engineers/architects during the final Project design phase. The results of the analysis, including the description of the necessary noise control features to attain the standard, will be submitted to the City along with the final building plans and approved prior to issuance of a building permit.</p>					

F. Comments and Responses on Draft EIR

APPENDIX F – COMMENTS AND RESPONSES

One letter was received during the public comment period, from the City of San Bruno. That letter is reproduced below with individual comments numbered. Responses to the numbered comments are provided below following the letter.



September 21, 2020

San Bruno Park School District
Attn: Mariana Solomon
500 Acacia Ave
San Bruno, CA 94066
msolomon@spbsd.k12.ca.us

RE: Draft Environmental Impact Report for the Decima Allen Elementary School Replacement Project

Dear Ms. Solomon:

Thank you for providing the City of San Bruno ("City") the opportunity to review and comment on the Draft Environmental Impact Report (Draft EIR) for the Decima Allen Elementary School Replacement Project.

In reviewing the document, the City has the following comments and questions on the Draft EIR, including the draft traffic report that were prepared in July 2020:

General Comments –

- ① • Under Project Description and project approvals (pages S-2 and II-7), in addition to necessary review and approval from the San Bruno Park School District, any improvement proposed within the City's public right-of-way such as change in street parking restrictions will be subject to review by the City's Traffic Safety & Parking Committee's review (TSPC) and approval from the City of San Bruno City Council.
- ② • The project will also be subject to the City's Public Works Department encroachment permit and grading permit reviews. Utility work, street excavation and paving, sidewalk closure, traffic control, curb and sidewalk work, and pavement striping/markings, signage, and other features of public right-of-way will be subject to the review and approval from the City's Public Works Department and possibly the TSPC and City Council. An encroachment permit will be required to construct the approved changes. All street striping details and construction work in the public right-of-way should demonstrate compliance with City standard and be included in the encroachment permit submittal.
- ③ • All proposed changes to parking restrictions (including loading zones, time limited parking, etc.) will require review by the City's Traffic Safety and Parking Committee

- ③ (cont.) | (TSPC) and any legal establishment of the changes will require City Council's approval and action.

Aesthetics –

- ④ | • Explain if any heritage tree removal would be consistent with City's Heritage Tree Ordinance and clarify how such review will be conducted and coordinated with the City of San Bruno's Community Service and Community and Economic Development Department Planning Division (page 32).

Transportation –

- ⑤ | • Explain why a cumulative study was not included.
• Comments pertaining to the traffic report prepared by PHA Transportation Consultants (please note that some of the following comments have been provided to PHA prior to this letter):
- ⑥ | ○ Figure 2 shows a "Drop Off" label within the staff parking lot. This label conflicts with Section 4.5 of the report where it states that no drop-offs will take place in the staff parking lot. Please clarify.
 - ⑦ | ○ The report finds that there will be no change to the traffic patterns near the school. However, with the new drop off area on Angus Avenue, parents will be encouraged to use it. Per the transportation survey, it indicates that only 18% of the existing pickup/drop offs occur on the Angus Ave curbside, while 55% of students are drop off on Elm, Linden, or other locations. This seems to indicate that traffic patterns could change significantly if more students are dropped off at the new drop off area.
 - ⑧ | ○ The report describes Angus, Elm, and Linden as two-lane roadways. Those roads are two-way streets but with parking allowed on both sides, which does not allow for two lanes on the roads. Please update the descriptions of those streets to match.
 - ⑨ | ○ Revise description of the City's LOS standard. Please review and apply to section 3.1.
 - ⑩ | ○ Figures 4, 7, 10 have mislabeled figures at the Jenevein Avenue and Linden Avenue intersection.
 - ⑪ | ○ Report states the distribution of added trips was done consistent to the existing traffic patterns. This study should take into consideration the new drop off area and should make adjustments to the distribution to account for existing and new trips to the new drop off area.
 - ⑫ | ○ Table 7 (Current Conditions + Project Traffic LOS Summary), explain and clarify why are there no cumulative scenarios that take into consideration other known/expected projects in the area.
 - ⑬ | ○ For the statement made that there are multiple dismissal times to justify a reduced number of pickups and drop offs, please verify if the studies used to develop the recommended drop of lane lengths had a single concentrated single dismissal time.
 - ⑭ | ○ Please provide more details for the sidewalk area between the drop off area and Angus Avenue road. How wide would the area be? Will the area be wide enough to accommodate loading activities occurring on both sides?
 - ⑮ | ○ A separate parking occupancy study was performed in this area as part of a different project. Some of the estimates for capacity vary greatly from the

- (15) | estimates in the other side. Please provide a more detailed breakdown of the calculation of the parking capacity.
(cont.) |
- (16) | ○ In the submitted traffic report executive summary section, please cite the sources for the following statements:
❖ All study intersections are at good LOS;
❖ There were 18 reported collision so that there is no particular traffic problems;
❖ There are 245 cars parked on the street.
- (17) | ○ Revised the proposed drop off zone as the current configuration is too narrow and needs to accommodate at least two lanes. Also, clarify if there will be a drop-off area in the staff parking or not as there is one shown on the plan.
- (18) | • In reference to the Parking Study, off-site/on-street parking should not be included in the parking analysis required by a development.
- (19) | • In reference to Table 9 (page 26) and Figure 9 (Page 28), it has been assumed that the parking capacity is 100% of theoretical capacity. In practice when parking capacity reaches 85% of theoretical capacity, it is considered full. Table 9 and Figure 9 and related text should be revised and available parking should be re-calculate such that parking capacity should be equal to theoretical capacity multiplied by 0.85.
- (20) | • The on-site drop off area and the width of sidewalk shall be shown in details. Also traffic circulations and signage and striping shall be provided to the City for review and comments.
- (21) | • Please discuss how on-site parking spaces will be provided for construction equipment and construction workers. As the City shall not allow any construction related parking including construction workers or storage of equipment or material on any public streets. A Parking Management Plan and Construction Phasing plan shall be prepared and submitted to the City for review and comments.

Hydrology and Water Quality -

- (22) | • The referenced State Water Resources Control Board Order No. R2 2009-0074 reference is outdated. The updated one is Municipal Regional Stormwater Permit, Order No. R2-2015-0049, as amended by Order No. R2-2019-0004. Please revise.

Utilities and Service Systems -

- (23) | • A hydraulic model for the sewer and water systems will be required to determine the impacts of the new school on the existing utility systems and to confirm adequate capacity. Under Section XVII(a), finding of No Impact is premature without completion of sewer and water system model studies.
- (24) | • The water hydraulic model factors current fire flow demand requirements and analyzes whether the existing pipeline infrastructure has the capacity to deliver fire flows to the site. The water hydraulic analysis is not solely dependent on fixture counts as cited in the Discussion section of Section XVII.
- (25) | • Upgrades for deficient off-site water and sewer facilities that serve the school site will be the responsibility of the School District.
- (25) | • Construction, if any, of utility upgrades shall be included in the project description and impact analysis.

Thank you again for the opportunity to review and provide comments in response to the Draft Environmental Impact Report for the Decima Allen Elementary School Replacement Project. The City remains highly interested in the project. Therefore, the City respectfully

requests the San Bruno Park School District to continue coordinating and consulting with City staff.

Should you have any further questions or need clarification, please call Hae Won Ritchie at (650) 616-7065.

Sincerely,



Jimmy Tan, P.E.
Public Works Director

Attachments:

City of San Bruno LOS Significant Thresholds (Page 5 of 6)
For Insertion into Project Planning Documents (Page 6 of 6)

Cc:

Darcy Smith, Community and Economic Development Director
Jimmy Tan, Public Works Director
Hae Won Ritchie, City Engineer/Deputy Director of Public Works
Pamela Wu, Planning and Housing Manager

City of San Bruno LOS Significance Thresholds

General Plan Policy Basis:

Two policies in the San Bruno General Plan address level of service in the City of San Bruno.

1. San Bruno General Plan Policy T-6 and Figure 4-2 identify 28 intersections at which the LOS Standard is D during the AM and PM peak periods.
2. San Bruno General Plan Policy T-B requires that an acceptable LOS be maintained on the City's street network.

Level of Service Standard:

The minimum acceptable Level of Service in the City of San Bruno is LOS D.

Traffic Impact Significance Threshold:

When evaluating development projects to determine if a significant traffic impact will occur the following significance thresholds shall be applied.

Signalized Intersections. A significant traffic impact occurs if for a peak hour:

1. The level of service falls from LOS D or better under existing conditions to LOS E or F under existing plus project conditions; or
2. The level of service is LOS E or F under existing conditions, and the addition of project trips would cause the critical-movement delay at the intersection to increase by four or more seconds; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Unsignalized Intersection. A significant traffic impact occurs if for a peak hour:

1. The intersection of a stop-controlled approach falls from LOS D or better under existing conditions to LOS E or F; or
2. The level of service is E or F under existing conditions; and the project would add ten or more vehicle trips to the critical movement of the intersection or stop-controlled approach during the peak hour; and the intersection meets the California Manual on Uniform Traffic Control Devices (CAMUTCD) peak hour volume traffic signal warrant during the peak hour; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Traffic Improvements

Improvements to address significant traffic impacts that occur as a result of existing plus project conditions are expected to be implemented at the time of occupancy. Depending on the situation, the applicant may be required to pay as much as the full cost of the improvements.

Improvements to address significant traffic impacts associated with cumulative plus project conditions are not required until a later date. The applicant may be required to pay for their fair share of the cost of the improvement.

For insertion into project planning documents:

Two policies in the San Bruno General Plan address level of service in the City of San Bruno. General Plan Policy T-6 and Figure 4-2 identify 28 intersections at which the LOS Standard is D during the AM and PM peak periods. General Plan Policy T-B requires that an acceptable LOS be maintained on the City's street network. The minimum acceptable Level of Service in the City of San Bruno is LOS D.

When evaluating development projects to determine if a significant traffic impact will occur the following significance thresholds shall be applied.

Signalized Intersections. A significant traffic impact occurs if for a peak hour:

1. The level of service falls from LOS D or better under existing conditions to LOS E or F under existing plus project conditions; or
2. The level of service is LOS E or F under existing conditions, and the addition of project trips would cause the critical-movement delay at the intersection to increase by four or more seconds; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Unsignalized Intersection. A significant traffic impact occurs if for a peak hour:

1. The intersection or a stop-controlled approach falls from LOS D or better under existing conditions to LOS E or F under existing plus project conditions; or
2. The level of service is E or F under existing conditions; and the project would add ten or more vehicle trips to the critical movement of the intersection or stop-controlled approach during the peak hour; and the intersection meets the California Manual on Uniform Traffic Control Devices (CAMUTCD) peak hour volume traffic signal warrant during the peak hour; or
3. The level of service would be LOS E or F under cumulative plus project conditions.

Responses to City of San Bruno Comment Letter

1. Comment noted. The District will work with City Traffic and Safety staff to obtain any necessary City approvals.
2. Comment noted. The District will work with City's Public Works Department staff to obtain any necessary City approvals for utility work, curb and sidewalk work, traffic control, pavement work, including any required encroachment permits. All construction in the public right of way will conform to City standards.
3. Comment noted. The City's review and approval of any changes to parking restrictions on City streets is acknowledged.
4. As described in the Initial Study appendix to the DEIR, an arborists report has been prepared to address potential tree loss resulting from the project (Aesculus Arboricultural Consulting, May 11, 2020). That report identified 57 trees on the site and two groves of trees on adjacent properties that overhang the site.

There are 11 live oaks and 3 redwoods on the site. There are no bay laurels on the site. Live Oaks #21-#26 are in an area where they may be able to remain (they are not within a building footprint). Live oak #29 is too close to the Kindergarten Building and would need to be removed. Live oaks #46-#49 are along Elm Ave. and should be able to be preserved. Redwoods #32 and #36 are also too close to the Kindergarten Building and would be removed. Redwood #37 is on a neighboring property and would remain. All three are reported in "good" health and the redwoods are substantial in size.

The City of San Bruno Heritage Tree Ordinance applies to:

- Any native bay (*Umbellularia californica*), buckeye (*Aesculus* species), oak (*Quercus* species), redwood (*Sequoia sempervirens*), or pine (*Pinus radiata*) tree that has a diameter of six (6) inches or more measured at fifty-four (54) inches above natural grade;
- Any tree or stand of trees designated by resolution of the city council to be of special historical value or of significant community benefit;
- A stand of trees, the nature of which makes each dependent on the others for survival; or
- Any other tree with a trunk diameter of ten (10) inches or more, measured at fifty-four (54) inches above natural grade.

Trees removed with a valid tree removal permit shall be replaced in accordance with the recommendation of the City Arborist. Replacement recommendations shall be formulated on the

basis of location, condition, value, age, and reasons for tree removal. Tree replacement shall be a minimum of either two 24-inch box size trees, or one 36-inch box size tree, for each heritage tree removed

The Ordinance declares such trees, whether located on City or private property, to be an asset to the community at large and provides penalties for removing or improperly pruning these trees. A permit may be required for removal of any such trees, and, if applicable, tree replacement would be required at the direction of the City Arborist. However, as the District is engaging in a “sovereign activity” it enjoys “sovereign immunity” from complying with local regulations such as this Ordinance. Therefore the District is not required to comply with the City’s Heritage Tree Ordinance, including permit requirements. Nonetheless, removal of “heritage trees” as defined in the City’s ordinance may be considered a significant impact under CEQA. In addition to the City’s Ordinance, the project would be required to implement Board Policy 3510 that designates three species of trees as native and protected. coastal live oak, coast redwood and coastal bay laurel.

As noted on the IS appendix to the DEIR, loss of protected trees could result in a significant impact if not mitigated. Mitigation Measure AES-1, below is included in the EIR to assure that this impact would be less than significant.

Mitigation Measure AES-1: A tree replacement plan shall be developed in consultation with the City’s Arborist and implemented by the District. The proposed plan would include replacement with large specimen trees. (24" or 36" box). A minimum 1 to 1 replacement would occur, with 2 to 1 replacement if determined to be feasible by the Project landscape architect. The landscape architect shall study the grove (Oaks #21-#26) near the future garden and see if grades can be adjusted to preserve the grove. To the extent feasible, mature native trees at the perimeter of the site (identified in the project’s arborist report) shall be preserved.

5. Per staff comments, PHA Transportation Consultants has added a cumulative scenario in the revised traffic report, included as an appendix to the Final EIR. This analysis adds the proposed Mills Park project. The analysis indicated that the Mills Park project will add 30 southbound and 20 northbound trips to the El Camino Real and Jenevein Avenue intersection during the morning peak hour, and would not add traffic to other study intersections near the school. The El Camino Real and Jenevein Avenue intersection currently operates at LOS C (about 25 seconds of delays) and will remain at LOS C with the added school and Mills Park traffic, indicating a less-than-significant impact. Therefore, no change in the EIR text is required.

6. The project site plan (Figure 2) in the traffic report has been revised. All student drop-off and pick up will occur at the new internal drop-off area at W. Angus Avenue. No drop-off/pick up will be permitted at the staff parking area. A revised site plan without drop-off label has been incorporated in the revised traffic report.

7. The directional traffic distribution will not change significantly from the current pattern because the drop-off area and the street system serving the study area remain unchanged at the front of the school. As such, school traffic approaching the school new drop-off lanes will drive through the same streets as before to approach the school.

The new drop-off lane design, however, is expected to change exiting drop-off patterns. According to parent/student surveys, about 18.2% drop-off/pick-up occurred along curbside on Angus Avenue, 27.3% at curbside in front of the school, 16.7% curbside at Elm Avenue, 9.1% curbside at Linden Avenue, and about 27.3% occurred at other locations. With the improved new drop-off lanes design, more than 80% of the drop-offs are expected to occur at the new drop-off lanes, as they provide a safer environment for both parents and students. This will not affect traffic distribution.

8. PHA has revised the Angus, Elm Linden Avenues from two-lane to two-way in the revised report as directed. The revised report is included as an appendix to the Final EIR.

9. We have incorporated City of San Bruno's LOS description section 3.1 of the report as requested. This does not affect the study's findings

10. The street names Jenevein Avenue and Linden Avenue for Figures 4, 7, and 10 have been corrected. Please see revised traffic report.

11. As discussed in the above response #7, the street layout remains unchanged and therefore school traffic would have to drive through the same streets to approach the school. As such, traffic circulation in the area will not change significantly with the project. However, because of the improved design of the drop-off area, more parents, about 80% (estimated), would drop-off and pick up at new drop-off lane as opposed to the curb side, as they do currently. In other words, the drop-off/pick up patterns would change noticeably with the project and the impact will be less than significant.

12. Please see response #5. We have added a cumulative scenario, adding the proposed Mills Park project in the revised report.

13. The traffic report has been revised to add more details regarding the drop-off lane. The analyses evaluated four scenarios;

- A: 500 students to be pickup at one time 2:46 p.m. (Assumes all students would be picked up at the regular dismissal time)
- B: 400 students to be pickup at the regular dismissal time at 2:46 (Assumes 100 kindergarteners to be picked up at an earlier hour)
- C: 300 students to be pickup at the regular dismissal time at 2:46 (Assumes 100 kindergarteners to be picked up at an earlier hour and another 100 students would stay for after school programs)
- D: 180 students to be pickup at the regular dismissal time at 2:46 (Assumes 100 kindergarteners to be picked up at an earlier hour, another 100 students would stay for after school programs, and 60% of students will be picked up at regular dismissal time)

All of the above study scenarios first assume operation with one drop-off lane, and then 2 drop-off lanes. Results are discussed in the revised report. Please note that the new design, either assuming one or two lanes, is superior to the current condition as it would provide a safer environment for both parents and students, and minimize potential traffic conflict on the street. Therefore, the impacts described in the EIR remain unchanged.

14. Please refer to the current project site plan. The sidewalk between the drop-off area and Angus Avenue will be 6 foot wide as requested by city staff earlier. The proposed plan is to have all drop-offs within the drop-off area.

15. The parking study prepared by Fehr and Peers was conducted on a different year, and with different dates and hours from the PHA analysis. The PHA review also indicated some of the study street blocks between the two studies are different, which explains the discrepancies and capacities. It should be noted that parking spaces in the study area are not striped. To determine the parking capacity for the study area, PHA first measured the length of each study block, subtracting driveways, painted curbs, and any curb space under 12 feet, based on measurements in the field, then divided it by a factor of 20 feet (the length of a standard parking space) to arrive at the estimated parking capacity per block. During the survey, parked cars at each block were counted at the designated hours at 7, 8, and 9 a.m., and again at 2, 3, and 4 pm on a normal school day to capture the on-street parking demand from parents during school peak times. Subtracting the number of parked cars from the estimated parking capacities at each block yields the number of free parking spaces.

The PHA parking study, survey methodologies, and procedures are described in Chapter 5 and Table 9 of the traffic report.

16. The findings cited in the executive summary - LOS, collisions, and the numbers of parked cars - are all based on the PHA study findings contained in the same traffic report, not from

others. Collision data were obtained from analyzing SWITRS (Statewide Integrated Traffic Records System). The executive summary is a brief summary of the study findings.

17. There will be no drop-off at the staff parking lot. All students will be dropped off at the internal drop-off lanes at Angus Avenue. The site plan currently shows two drop-off lanes.

18. The PHA parking study did not use off-site and on-street parking to satisfy the parking requirements for the school. There is adequate on-site parking for school staff and visitor demands. The parking study was prepared as requested by City staff to assess parking saturation and availability during the school hours.

19. PHA concurs that 85% generally is considered at capacity for parking in most parking garages and parking lots. The parking section of the Traffic Report documents the number of available spaces and parked cars in the area on the date surveyed. It provides a snapshot of the parking conditions in the area at the time of the survey, showing the number of spaces occupied and available by percentage. Referring to Table 10 of the Traffic Report, the highest level of saturation is 68% for the area as a whole, well below the 85% level cited in the comment.

20. Detailed site plan drawings will be submitted to the City via separate document showing sidewalk details, signing and striping for City review as part of the District's application for an Encroachment Permit from the City.

21. The District will provide construction phasing, parking management, and staging plans for City review and approval via separate document submittal.

22. Comment noted. The order number has been updated in the EIR text.

23. The City has prepared a water supply technical memorandum (West Yost, Technical Memorandum from Whitney Jones and Nathaniel Homan, West Yost, to Jason Tong, City of San Bruno, November 13, 2020). That study found that pressures and velocities in the vicinity of the Project meet the recommended criteria for peak-hour water demand. The evaluation also addressed maximum daily demand plus fire flow. Although only one of the five hydrant locations adjacent to the Project can provide sufficient fire flow for the Project, only one location with sufficient flow is required to provide adequate fire protection. Therefore, no improvements are recommended as a result of the maximum day plus fire flow demand evaluation.

The City also has prepared a sanitary sewer capacity evaluation technical memorandum (Woodward and Curran, Technical Memorandum from Katie Howes, December 2, 2020). That study found that the Allen School will have a capacity to serve 500 students and 34 staff. The average base wastewater flow (BWF) contributed by the school was estimated based on a design

unit flow factor of 5 gallons per day (gpd) per capita typically used for elementary schools. Therefore, the total BWF generated by the school would be approximately 2,700 gpd. Woodward and Curry modeled sewer capacity of the pipeline network serving the project and vicinity. The model indicates that under design peak wet weather flow (PWWF) conditions, the 6-inch pipe in Poplar would be flowing less than half full, and the 14- and 12-inch sewers in Linden Avenue, El Camino Real, and Angus Avenue would be flowing full or slightly surcharged (no more than 1 or 2 inches). The Sewer Master Plan indicated that the downstream larger diameter trunk sewers in Angus Avenue and 7th Avenue east of San Mateo Avenue would have adequate capacity under existing and future peak design flows, so the small flow increase from Allen School would have negligible impact on the capacity of these lines. Therefore, no improvements are recommended by Woodward and Curran as a result of the evaluation.

Based on the water and sewer infrastructure evaluations, no significant impacts to water or sewer infrastructures requiring new off-site facilities would result from project implementation.

24. See response to Comment 23, above. Detailed technical analyses have determined that no off-site water or sewer infrastructure improvements would be required for the project.

25. See response to Comment 23, above. Detailed technical analyses have determined that no off-site water or sewer infrastructure improvements would be required for the project, therefore no off-site construction impacts associated with these facilities would occur.