



## CITY OF SAN BRUNO

### Mitigated Negative Declaration

Pursuant to Section 21000 et seq of the Public Resources Code, a Mitigated Negative Declaration is hereby granted for the following project:

1. Project Title: Stratford School - San Bruno City Park Campus
2. Lead Agency Name and Address: City of San Bruno  
567 El Camino Real  
San Bruno, CA 94066
3. Contact Person and Phone Number: Pamela T. Wu  
Planning and Housing Manager  
[pwu@sanbruno.ca.gov](mailto:pwu@sanbruno.ca.gov)  
650-616-7053  
201 Balboa Way, San Bruno  
020-351-430
4. Project Location and APNs:
5. Project Sponsor's Name & Address: Stratford School  
12930 Saratoga Avenue  
Saratoga, CA 95070
6. General Plan Designation: Low-Density Residential
7. Zoning: R-1, Single-Family Residential
8. Description of Project: Stratford School, Inc. proposes to remodel the former El Crystal Elementary School as a private preschool and kindergarten, consisting of 11 preschool and two kindergarten classes ("San Bruno City Park Campus"). The campus would have a maximum enrollment of 348 students (288 Pre-K and 60 Kindergarten). The San Bruno City Park Campus would operate in tandem with the Stratford School's existing Crestmoor Canyon Campus, located at 2322

Crestmoor Drive in San Bruno. Once the San Bruno City Park Campus is operational, some students and faculty from the existing Stratford School would transfer to the new campus.

## FINDING

The Community and Economic Development Director finds the project described above will not have a significant effect on the environment in that the attached Initial Study identifies one or more potentially significant effects on the environment for which the project applicant, before public release of this draft Mitigated Negative Declaration (MND), has made or agrees to make project revisions that clearly mitigate the effects to a less than significant level.

## **MITIGATION MEASURES INCLUDED IN THE PROJECT TO REDUCE POTENTIALLY SIGNIFICANT EFFECTS TO A LESS THAN SIGNIFICANT LEVEL**

- A. AESTHETICS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- B. AGRICULTURE AND FOREST RESOURCES** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- C. AIR QUALITY**

**Impact AIR-2.1:** Without implementation of the BAAQMD best management practices, the project could result in potentially significant air quality impacts.

**MM AIR-2.1:** The following standard measures reflect BAAQMD best management practices and would be implemented by the project to reduce potential impacts from fugitive dust.

- 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 roads shall be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be 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.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control

measure Title 13, Section 2485 of California Code of Regulations [CCR]).

- Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

**Impact AIR-3.1:** The proposed project would generate TACs during construction that could adversely expose nearby sensitive residential receptors.

**MM AIR-3.1:** The project shall use equipment that has low DPM or zero emissions, implementing the following measures:

- All diesel-powered off-road equipment larger than 25 horsepower, operating on the site for more than two days, shall, at a minimum, meet U.S. EPA particulate matter emissions standards for Tier 4 engines that altogether achieve an 85 percent or greater reduction in particulate matter exhaust; alternatively (or in combination) use of Tier 3 off-road diesel equipment equipped with Level 3 verified diesel emission control systems or alternatively-fueled or electric equipment (i.e., non-diesel).
- Avoid diesel generator use by supplying line power to the construction site and limiting the use of diesel generators to no more than 100 total hours during the entire construction period.
- Avoid staging of construction equipment near portions of the site that are adjacent to residences.

## D. BIOLOGICAL RESOURCES

**Impact BIO-2:** Project implementation would impact nesting birds, including raptors and other migratory birds, if present during the time of construction.

**MM BIO-1.1:** To the extent feasible, initial grading and vegetation removal activities (or at least the commencement of such activities) should be scheduled to occur during the non-nesting season (September 1 to January 31). If construction activities are scheduled to take place outside of the nesting season, all impacts on nesting birds protected under the MBTA and CDFW will be avoided.

**MM BIO-1.2:** If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys shall be

conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of construction activities or tree relocation or removal. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats within 250 feet of the limits of construction activities. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 50 feet for other species), to ensure that nests of species protected by the MBTA and CDFW shall not be disturbed during project implementation. These buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.

- MM BIO-1.3:** If construction activities will be scheduled during the nesting season (February 1 to August 31), all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are planned to be removed by the project must be removed prior to February 1st, the start of the nesting season.

#### E. CULTURAL RESOURCES -

- Impact CUL-2.1:** Construction of the proposed project could result in significant impacts to unknown archaeological resources if present on-site.
- MM CUL-2.1:** Undiscovered Archaeological Resources. If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity (“midden”), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City’s Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior’s Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.
- MM CUL-2.2:** Worker Awareness Training. Prior to the initiation of any site preparation and/or the start of construction, the project sponsor shall ensure that all construction workers receive training overseen by a

qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.

- F. **ENERGY** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- G. **GEOLOGY AND SOILS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- H. **GREENHOUSE GAS EMISSIONS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- I. **HAZARDS AND HAZARDOUS MATERIALS -**

**Impact HAZ-2.1:** Release of hazardous materials, specifically asbestos-containing materials and lead-based paint present on site could pose a risk to construction workers and nearby sensitive receptors during building demolition.

**MM HAZ-2.1:** To reduce the potential for construction workers and nearby sensitive receptors to encounter hazardous materials contamination from ACMs and lead-based paint, the following measures are included in the project.

- In conformance with local, state, and federal laws, an asbestos building survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition prior to issuance of a demolition permit for any site structure.
- A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the NESHAP guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.
- During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring

and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

- J. HYDROLOGY AND WATER QUALITY** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- K. LAND USE AND PLANNING** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- L. MINERAL RESOURCES** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

## **M. NOISE**

**Impact NOI-1.1:** Construction of the project could result in temporary noise impacts to adjacent residents.

**MM NOI-1.1:** Implementation of the Best Management Practices below would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With the inclusion of these practices and recognizing that noise and vibration generated by construction activities would occur over a temporary period, the temporary increase in ambient noise levels resulting from the project would be less than significant.

- Develop a construction noise control plan, including, but not limited to, the following available controls:
  - Limit construction hours to between 7:00 a.m. and 7:00 p.m., Monday through Friday
  - Construct temporary noise barriers to screen stationary noise-generating equipment. Temporary noise barriers shall be used during the heaviest periods of construction when there would be potential to exceed the Municipal Code limit of 85 dBA at 100 feet, or when heavy construction is occurring along shared property lines with residences. The temporary barriers shall be used during the:
    - demolition of existing structures on the eastern corner of the site and
    - when heavy ground clearing or excavation work is taking place within 50 feet of shared residential property lines.

Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Control noise from construction workers' radios to a point where they are not audible at existing commercial residential uses bordering the project site.
- The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

**Impact NOI-2.1:** Groundborne vibration levels generated by construction equipment would result in a potentially significant impact at residences adjacent to the project site.

**MM NOI-2.1:** The following mitigation measures would reduce this impact to a less-than-significant level at residential structures located within 15 feet of the shared property line.

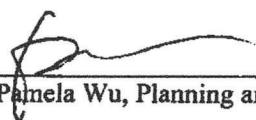
- Avoid using vibratory rollers and tampers within 15 feet of residences on adjacent parcels.

- Avoid dropping heavy objects or materials within 15 feet of residences on adjacent parcels.
- N. **POPULATION AND HOUSING** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- O. **PUBLIC SERVICES** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- P. **RECREATION** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- Q. **TRANSPORTATION/TRAFFIC** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- R. **TRIBAL CULTURAL RESOURCES** - In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1 and MM CUL-3.1 will be implemented, as stated in Section 4.5 Cultural Resources of this Initial Study.
- S. **UTILITIES AND SERVICE SYSTEMS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.
- T. **WILDFIRE** – The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Furthermore, the project site, while adjacent to the San Bruno City Park Wildland/Urban Interface Hazard Area, is mapped outside the City’s wildland fire hazard areas in the San Bruno General Plan. Accordingly, the project would not result in wildfire impacts.
- U. **MANDATORY FINDINGS OF SIGNIFICANCE** – With the implementation of the mitigation measures identified above, the project would not degrade the quality of the environment, substantially affect the biological resources, or eliminate important examples of California history or prehistory. The mitigation measures would also ensure that the project’s contribution to cumulative impacts would not be cumulatively considerable, and the project would not cause substantial adverse effects on human beings, either directly or indirectly.

## **PUBLIC REVIEW PERIOD**

Before 5:00 p.m. on **May 26, 2020** any person may:

1. Review the Draft MND as an informational document only; or
2. Submit written comments regarding the information and analysis in the Draft MND. Before the MND is adopted, Planning staff will prepare written responses to any comments, and revise the Draft MND, if necessary, to reflect any concerns raised during the public review period. All written comments will be included as part of the Final MND.



Pamela Wu, Planning and Housing Manager

5/4/2020

Date



Darcy Smith, Community and Economic Development Director

5/4/2020

Date