
**DRAFT INITIAL STUDY/
MITIGATED NEGATIVE DECLARATION FOR THE
BURLINGAME HIGH SCHOOL GYM REPLACEMENT PROJECT**

Prepared for:

San Mateo Union High School District
650 N. Delaware Street,
San Mateo, CA 94401

Prepared by:

Grassetti Environmental Consulting
7008 Bristol Drive
Berkeley, CA 94705

July 2022

This page intentionally blank

TABLE OF CONTENTS

Section	Page No.
ACRONYMS AND ABBREVIATIONS	iii
ENVIRONMENTAL DETERMINATION	iv
I. INTRODUCTION.....	1
II. PROJECT DESCRIPTION.....	3
III. INITIAL STUDY CHECKLIST	11
I. Aesthetics	11
II. Agricultural and Forestry Resources	13
III. Air Quality	14
IV. Biological Resources.....	20
V. Cultural Resources.....	22
VI. Energy	24
VII. Geology and Soils	25
VIII. Greenhouse Gas Emissions.....	28
IX. Hazards and Hazardous Materials	31
X. Hydrology and Water Quality	35
XI. Land Use and Planning.....	39
XII. Mineral Resources	40
XIII. Noise.....	41
XIV. Population and Housing	49
XV. Public Services	50
XVI. Recreation.....	52
XVII. Transportation/Traffic.....	53
XVIII. Tribal Cultural Resources.....	55
XIX. Utilities and Service Systems	57
XX. Wildfire Hazards.....	59
IV. MANDATORY FINDINGS OF SIGNIFICANCE.....	60
V. REFERENCES.....	62
VI. REPORT PREPARERS	63
 APPENDIX A NOISE REPORT	
APPENDIX B MITIGATION MONITORING AND REPORTING PROGRAM	

FIGURES

Figure 1	Project Location	5
Figure 2	Project Site	6
Figure 3	Site Plan	Error! Bookmark not defined.

TABLES

Table AQ-1	Local Air Quality Monitoring Data Summary	Error! Bookmark not defined.
Table AQ-2	Significance Thresholds for Air Pollutant Emissions	Error! Bookmark not defined.
Table AQ-3a	Project Construction Criteria Pollutant Emissions.	Error! Bookmark not defined.
Table AQ-3b	Project Construction Criteria Pollutant Emissions.	Error! Bookmark not defined.
Table AQ-4a	Project Construction Fugitive Pollutant Emissions	Error! Bookmark not defined.
Table AQ-4b	Project Construction Fugitive Pollutant Emissions	Error! Bookmark not defined.
Table AQ-4	Project Operational Criteria Pollutant Emissions ..	Error! Bookmark not defined.

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ADWF	average dry weather flow
APE	Area of Potential Effect
BMP	Best Management Practice
CARB	California Air Resources Board
FEMA	Federal Emergency Management Agency
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
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
RWQCB	Regional Water Quality Control Board
SCH	State Clearinghouse
SO _x	sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
TAC	toxic air contaminant
TMDL	Total Maximum Daily Load
VOC	volatile organic compound

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.

	Aesthetics		Greenhouse Gas Emissions		Public Services
	Agricultural and Forestry Resources	X	Hazards and Hazardous Materials		Recreation
	Air Quality	X	Hydrology/Water Quality		Transportation/ Traffic
	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.	X
I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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.	


Yancy Hawkins, Associate Superintendent, SMUHSD


Date

I. INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the San Mateo Union School District (SMUHSD or District), 650 North Delaware Street, San Mateo CA, pursuant to the California Environmental Quality Act (CEQA) statutes¹ and Guidelines². It provides documentation to support the conclusion that the proposed Burlingame High School Gym Replacement Project (“the project”), with mitigation identified herein, would not cause a potentially significant impact to the physical environment. The proposed site is located on the Burlingame High School campus, 1 Mangini Way, the City of Burlingame.

This IS/MND 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/MND. 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 any 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/MND is subject to review and comment by responsible agencies and the public during a statutory public review period (30 days). Any necessary revisions would be incorporated in the Final IS/MND.

The Draft IS/MND will be circulated for a 30-day public review period. Should the District approve the project, it would be required to file a “Notice of Determination” for posting by the County Clerk and the State Clearinghouse. The filing of the notice and its posting starts a 30-day statute of limitations on court challenges to the CEQA review of the Project.

Document Organization

This document is organized into the following sections:

SECTION I – INTRODUCTION: Provides background information about the project.

SECTION II – PROJECT DESCRIPTION: Includes project background and detailed description of the project.

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

¹ Public Resources Code Sections 21000 et seq.

² Title 14, Section 15000 et seq. of the California Code of Regulations

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

APPENDICES: Includes technical reports, comments and responses on the Draft IS/MND, and Mitigation Monitoring and Reporting Program.

II. PROJECT DESCRIPTION

Project Name:	Burlingame High School Gym Replacement Project
Project Location:	1 Mangini Way. Burlingame CA 94010
Project Applicant and Lead Agency Contact:	Yancey Hawkins, Deputy Superintendent, Business Services San Mateo Union High School District 650 N. Delaware Street San Mateo, CA 94401 (650) 558-2203 yhawkins@smuhdsd.org
General Plan Designation:	Public/Institutional
Zoning:	Public/Institutional
Project Approvals:	SMUHSD approval. Review of facilities by Division of the State Architect for structural safety, fire and life safety, and ADA accessibility.
Date Initial Study Completed:	July 31, 2022

PROJECT DESCRIPTION

Project Purpose/Objectives

The current gym facilities are outdated, have inadequate safety zones at sports courts, and bad acoustics for games.

Project Location

Burlingame High School is located at 1 Mangini Way in the Oak Grove Manor neighborhood in the City of Burlingame. (See Figure 1). The school is located south of Oak Grove Avenue, east of Carolan Avenue, and west of Chatham Road. Regionally, the campus is accessed via from US Highway 101, via Broadway or Peninsula Avenue.

Burlingame High School has an enrollment of approximately 1475 students and was originally built in 1923-27. The existing gym/locker room complex was built in the 1970's with major modifications in the 1990's, and is located in the center of the school's campus, between the football field/tennis courts and the main campus building complex. The project site comprises approximately 1.15 acres of the overall 22-acre campus (see Figure 2- campus site plan).

Surrounding Land Uses

The portion of the campus containing the project site is surrounded by other school uses. The overall school campus is surrounded by single family residences to the north and east and a park to the south, with a major transportation corridor extending west of the site (including major roadways and a rail corridor).

Existing Site Conditions and Facilities

The existing project site currently contains the school's existing gym and locker room buildings, as well as a tennis court. The existing gym and locker room buildings total 37,400 square feet.

Proposed Gym Replacement

The proposed gym replacement project is described below and shown in Figures 3 and 4.

The project proposes to demolish the existing buildings and replace them with a new 2-story 37,118 sq. ft. gym/locker room building and a 2080 sq. ft. fitness/weight room building. Demolition activities would occur over a 1-month period.

The new gym would include basketball courts, locker rooms, a wrestling room, team rooms, bathrooms, showers, concession stand, a classroom, and storage rooms (see Figures 3 and 4). The basketball courts would include interior public address systems for games, and exterior safety lighting. The fitness/weight building would be a single-story building connected to the gym building via a covered walkway. The maximum heights of the proposed buildings would be 48 feet.

Figure 1 Project Location

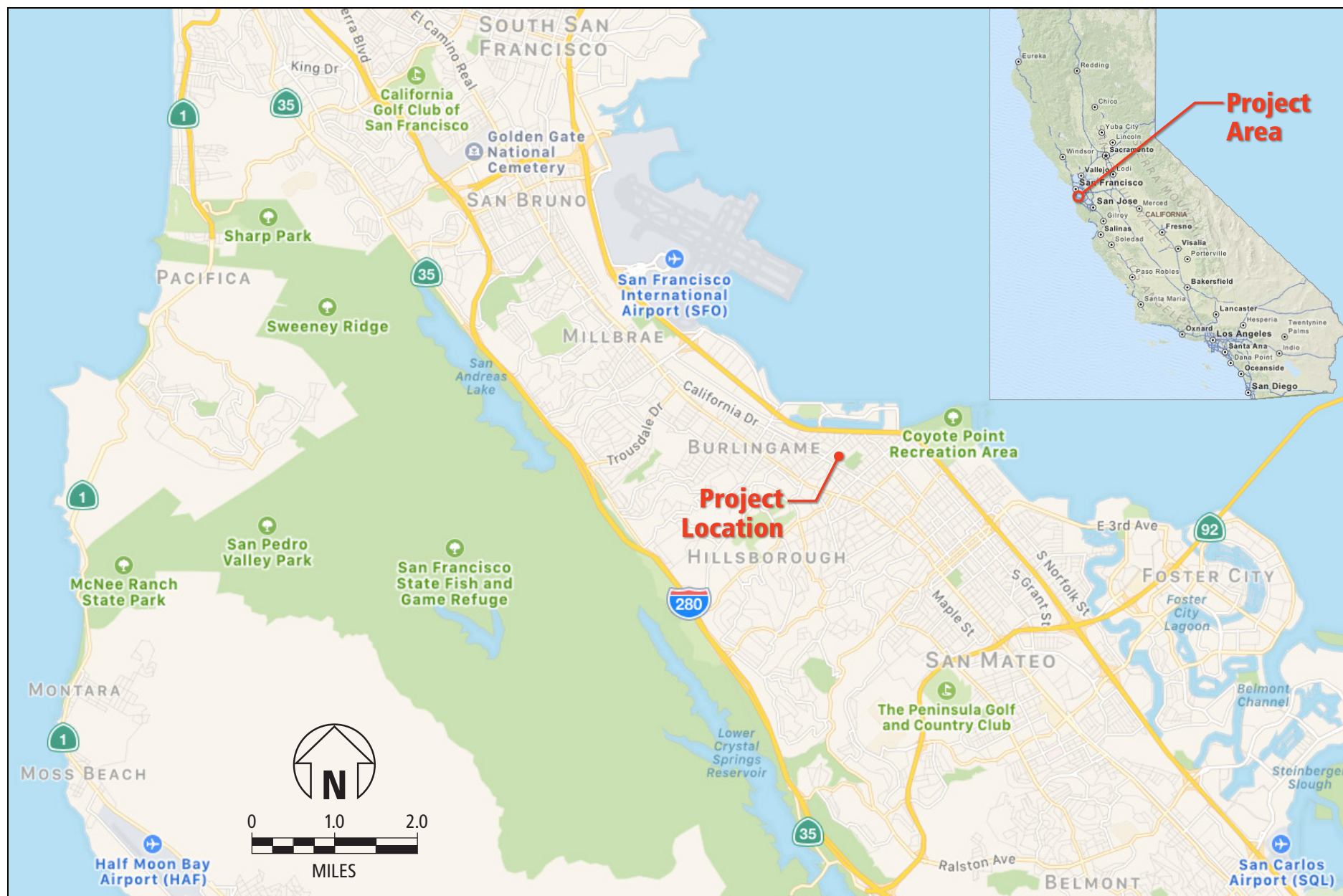


Figure 1
Project Location

Source: Grasseti Environmental and TomTom Maps

Figure 2 Project Site

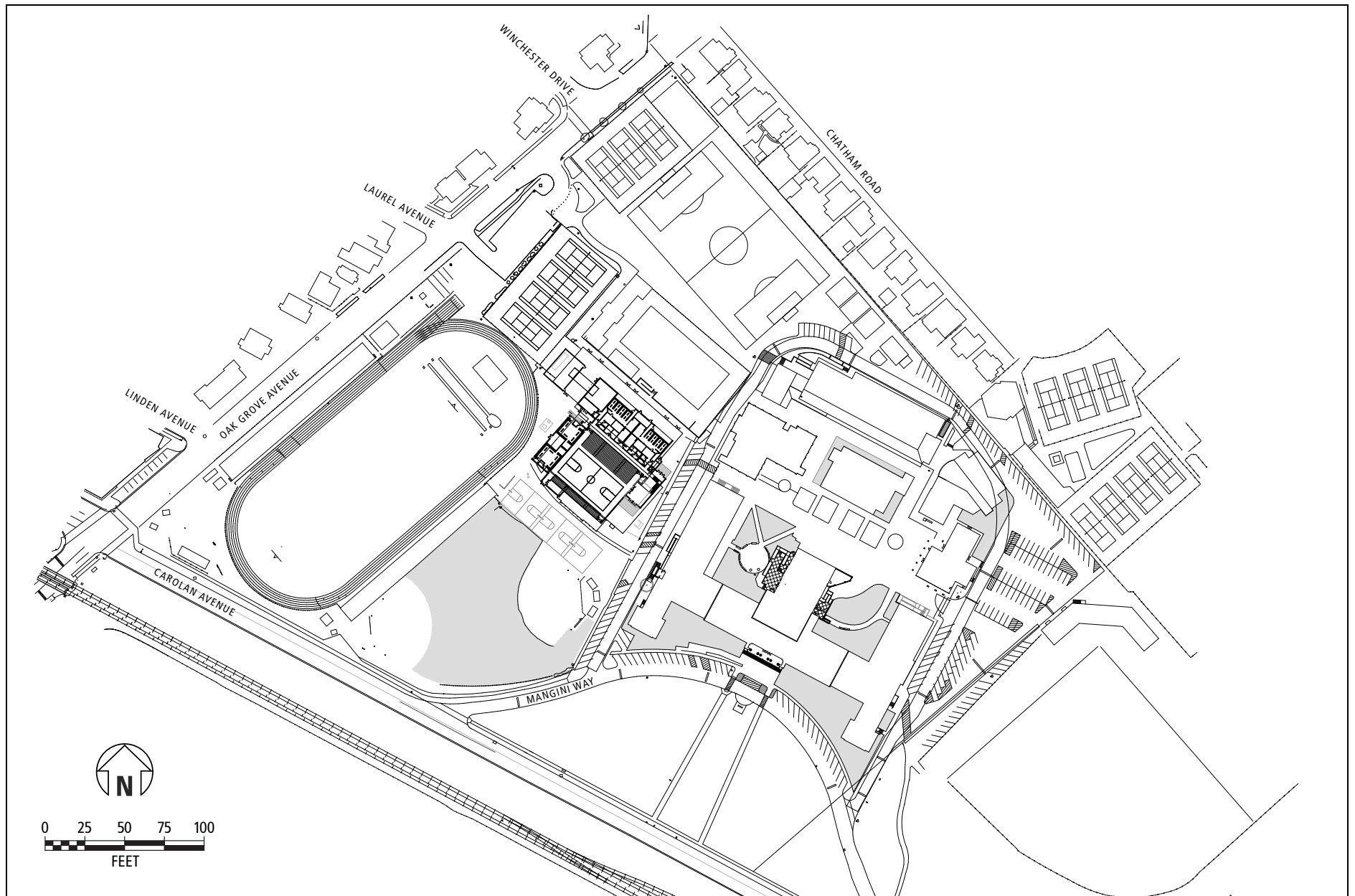


Figure 2
Campus Site Plan

Source: Quattrocchi Kwok Architects

Figure 3 – First Floor Plan

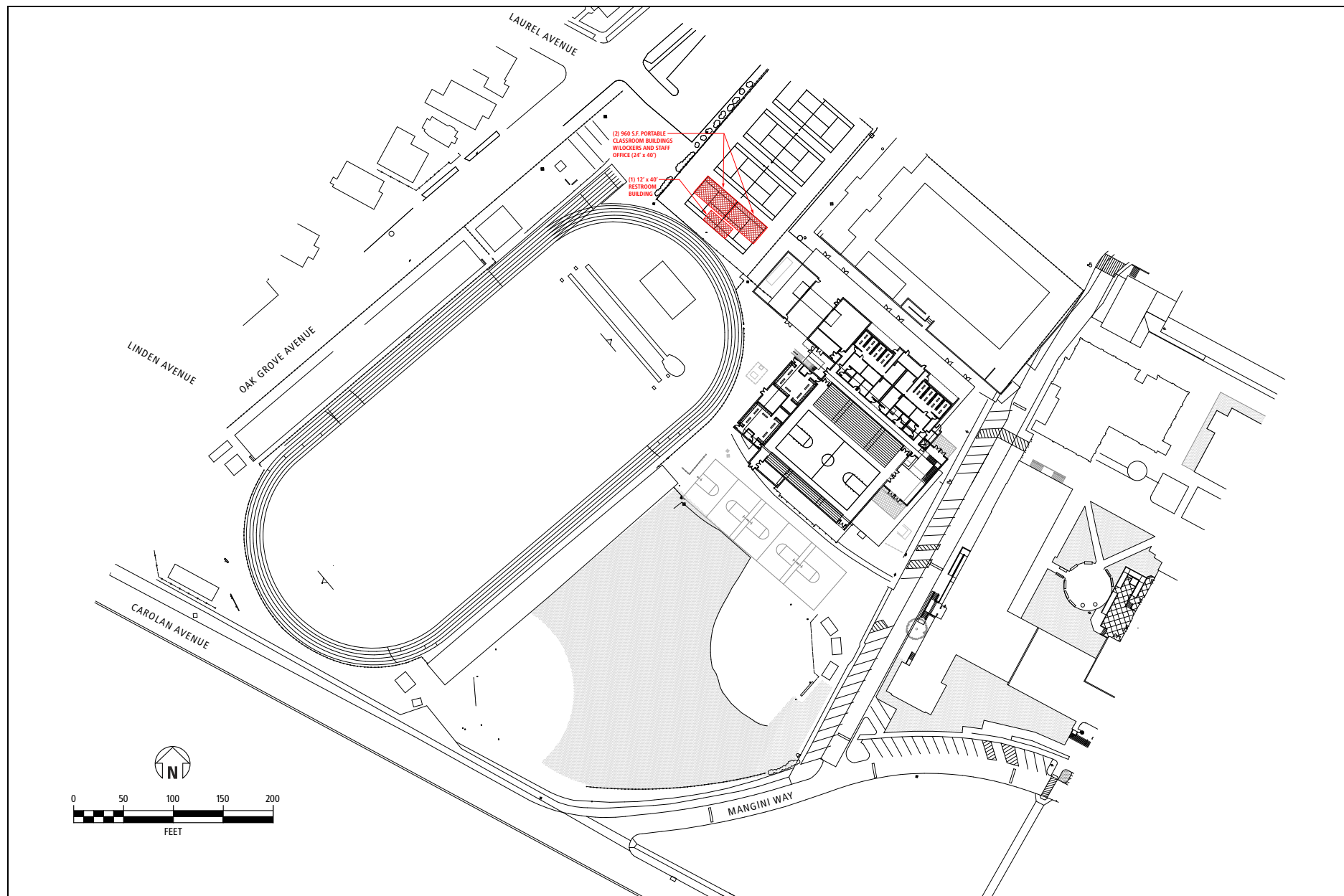


Figure 3
Partial Campus Site Plan

Source: Quattrocchi Kwok Architects

Figure 4: Second Floor Plan

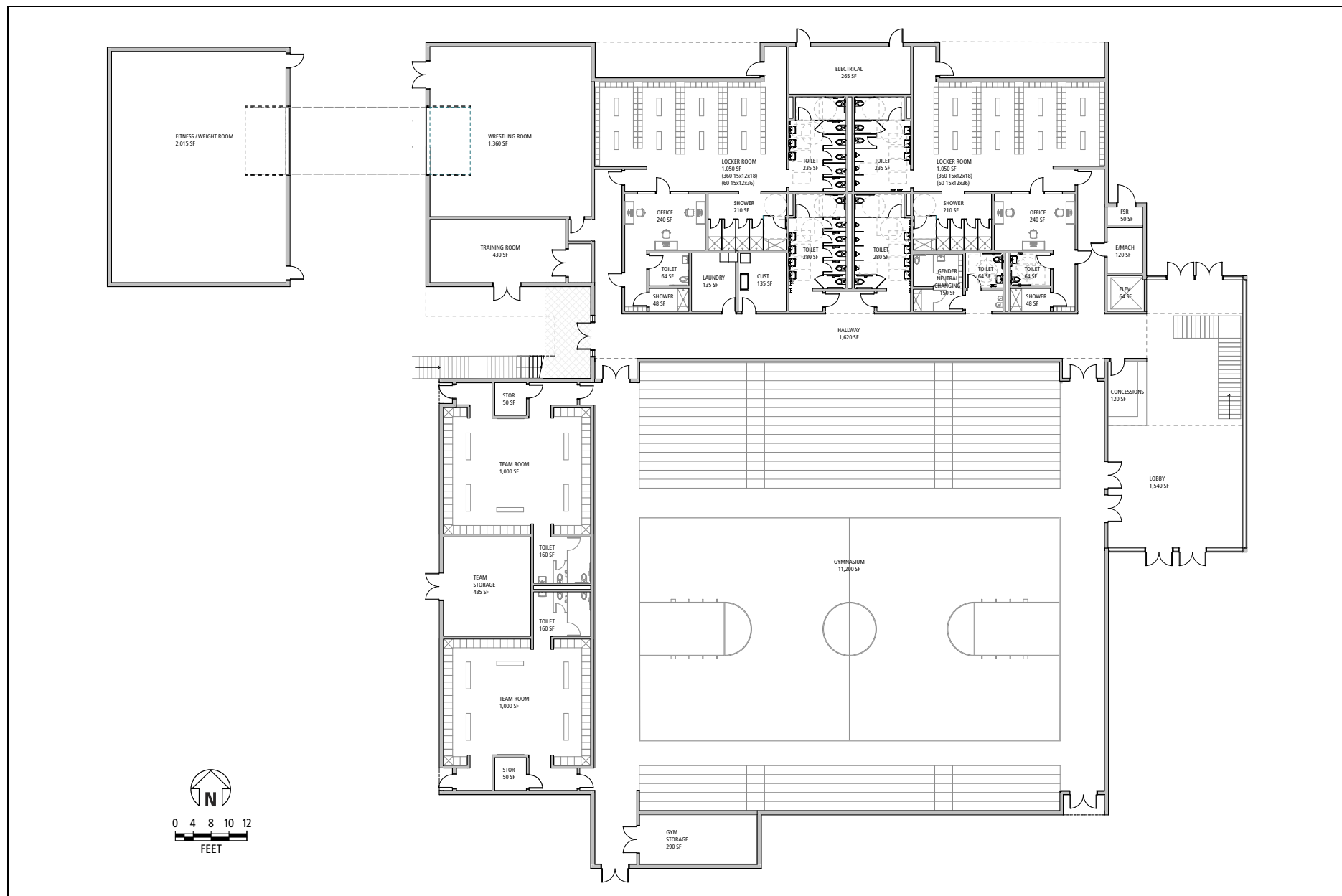


Figure 4
Gymnasium Floor Plan

Source: Quattrocchi Kwok Architects

In addition to the above structures, two 960 sq. ft. portable buildings would be placed on the westernmost tennis court to be used as office and locker rooms during construction. A 480 sq. ft. portable bathroom building also would be placed on that court for use during construction. These buildings would be removed upon completion of the project.

During construction basketball games would be played off site at nearby gyms.

Infrastructure Connections. Utility service would be provided via connections to existing on-campus water, sewer, gas, and electrical lines. A new Main Electrical Service is anticipated

Days and Hours of Operation. The proposed project would not change or expand any uses of the gym compared to existing use types and levels.

School Capacity. There would be no change in student enrollment or staffing from the proposed field upgrade project.

Tree Protection, Planting and Removal. No existing trees would be removed and no trees would be planted.

Grading and Earthwork. The preliminary project grading scheme would result in 4,000 cubic yards of exported soils and 3188 cubic yards of fill. Minimal topographic changes to the level site would occur as a result of the project's cut and fill. The school is under a deed restriction that controls grading due to the presence of contaminated soils on certain areas of the campus. DTSC will require that the site grading be Monitored Site for Arsenic Contaminate Soils. This issue is further discussed in the Hazards and hazardous Materials section of this IS/MND.

Drainage and Runoff. The site is currently drained into the campus drainage systems which hooks into the City's storm drainage system. The proposed project would be similarly drained. It would replace existing impervious surfaces so would not alter runoff quantities or quality from the site.

Construction Schedule, Equipment, Workers, and Hours

Construction Schedule. The project has a tentative construction start date of May 2023, with completion anticipated by January 2025.

Equipment Use. Equipment used during construction would vary by phase, but would include excavators, backhoes, dump trucks, graders, compactors, water trucks, and similar equipment, as well as cement trucks, and various power equipment for building construction.

Construction Workers. Up to 15 construction workers would be onsite on an average day.

Construction Hours. Typical construction hours would be 7:00 am to 4:30 PM, weekdays. Some work may also be done on Saturdays between 7:00 am and 4:30 PM.

Staging Areas. Construction staging would be located on the project site.

Tree Removal. No tree removal would be required for the project.

III. 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, c) There are no scenic vistas in the project vicinity, which is generally level land developed mostly with are suburban residential, institutional, and commercial uses. The project would replace the existing gym and locker room buildings internal to the campus with a new gym and fitness buildings of similar footprint. Although the new gym building would be slightly higher than the existing building, its location internal to the campus would buffer it from any off-campus views from nearby roadways or residences. Therefore, the project would have **no impact** on scenic vistas or scenic resources.
- b) There are no rock outcroppings, historic buildings, or scenic highways on the project site and no scenic highways with views of the project site. Therefore, there would be **no impact**.

- d) The proposed exterior safety lighting for the new gym would be similar to existing exterior lighting near the school's gym and swim center. Exterior lighting would be shielded and directed to minimize light and glare spillage. Because of the site's location in the center of the school campus, this lighting would not be visible off-site and therefore **no impact** would occur.

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 covered by existing high school facilities, including the existing gym and tennis courts. There are no agricultural or forested lands on or in the vicinity of the high school campus, with the exception of the garden adjacent to the field, which would remain and not be impacted by the project. Therefore, the project would not result in the conversion of farmland or forestland to non-agricultural uses would have **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

This section is based on the *Air Quality Technical Report* (dated May 2022) prepared for the proposed project by RCH Group. This section describes construction and operational air quality impacts associated with the proposed project and is consistent with the methods described in the Bay Area Air Quality Management District (BAAQMD) *CEQA Air Quality Guidelines* (May 2017).

The air quality analysis includes a review of criteria pollutant emissions such as carbon monoxide (CO), nitrogen oxides (NO_x), volatile organic compounds (VOC) as reactive organic gases (ROG), particulate matter less than 10 micrometers (coarse or PM₁₀), and particulate matter less than 2.5 micrometers (fine or PM_{2.5}). Diesel particulate matter (DPM) is also a concern regarding health risk assessment (HRA).

The United States Environmental Protection Agency (USEPA) has established National Ambient Air Quality Standards (NAAQS) under the Clean Air Act (CAA) for the criteria pollutants and California Air Resources Board (CARB) has established California Ambient Air Quality Standards (CAAQS). Air basins where NAAQS and/or CAAQS are exceeded is designated as a “nonattainment” area. If standards are met, the area is designated as an “attainment” area.

The project site is located within the San Francisco Bay Area Air Basin (Air Basin) under the jurisdiction of the BAAQMD. The BAAQMD is the local agency responsible for the administration and enforcement of air quality regulations for the area. The Bay Area is currently designated “nonattainment” for state and national (1-hour and 8-hour) ozone standards, for the state PM₁₀ standards, and for state and national (annual average and 24-hour) PM_{2.5} standards. The Bay

Area is designated “attainment” or “unclassifiable” with respect to the other ambient air quality standards.

Discussion

- a) The BAAQMD *2017 Clean Air Plan/Regional Climate Protection Strategy (CAP/RCPS)*, which provides a roadmap for BAAQMD’s efforts over the next few years to reduce air pollution and protect public health and the global climate. The CAP/RCPS identifies potential rules, control measures, and strategies that BAAQMD can pursue to reduce GHG in the Bay Area.

When a public agency contemplates approving a project where an air quality plan consistency determination is required, BAAQMD recommends that the agency analyze the project with respect to the following questions: (1) Does the project support the primary goals of the air quality plan; (2) Does the project include applicable control measures from the air quality plan; and (3) Does the project disrupt or hinder implementation of any air quality plan control measures? If the first two questions are concluded in the affirmative and the third question concluded in the negative, the BAAQMD considers the project consistent with air quality plans prepared for the Bay Area.

The recommended measure for determining project support of these goals is consistency with the previously mentioned BAAQMD thresholds of significance. As presented in the subsequent impact discussions, the proposed project would not exceed the BAAQMD significance thresholds; therefore, the proposed project would support the primary goals of the *2017 CAP/RCPS* and would not hinder implementation of any of the control measures. Therefore, this impact would be **less than significant**.

- b) ***Construction Impacts***

Project construction would generate short-term emissions of air pollutants, including fugitive dust and equipment exhaust emissions. The BAAQMD *CEQA Air Quality Guidelines* recommend quantification of construction-related exhaust emissions and comparison of those emissions to significance thresholds. CalEEMod (California Emissions Estimator Model Version 2020.4.0) was used to quantify construction-related pollutant emissions.

Table AQ-1 provides the estimated short-term construction emissions for the proposed project. The average daily construction period emissions (i.e., total construction period emissions divided by the number of construction days) were compared to the BAAQMD significance thresholds. Construction-related emissions would be below the BAAQMD significance thresholds.

Table AQ-1: Estimated Daily Construction Emissions (pounds)

Condition	ROG	NOx	PM ₁₀	PM _{2.5}	CO
Construction	1.60	12.3	0.11	0.11	13.7
Significance Threshold	54	54	82	54	---
Significant (Yes or No)?	No	No	No	No	No

SOURCE: CalEEMod Version 2020.4.0, RCH Group, 2022.

BAAQMD's *CEQA Air Quality Guidelines* require several best management practices to control fugitive dust and exhaust emissions regardless of the estimated construction emissions. There would be a potential fugitive dust impact that is mitigated to less than significant with implementation of the erosion control measures that would be part of these best management practices. The BAAQMD requires that the following measures be implemented by the construction contractor:

Fugitive Dust Control Measures

- 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.
- 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 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.

Basic Exhaust Emissions Reduction Measures.

- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). 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.

Emissions of VOC due to the use of architectural coatings are regulated by the limits contained in Regulation 8: Organic Compounds, Rule 3: Architectural Coatings (Rule 8-3). Rule 8-3 was revised on January 1, 2011 to include more stringent VOC limit requirements. The VOC architectural coating limits specify that the use paints and solvents with a VOC content of 100 grams per liter or less for interior and 150 grams per liter or less for exterior surfaces shall be required.

As indicated, the estimated construction emissions would be below the BAAQMD's significance thresholds and the proposed project construction impacts would be **less than significant**.

Operational Impacts

The proposed project would involve the gym replacement with a square footage of a similar size as the existing facility. As such, the operational impacts would be similar for the proposed project versus the existing conditions given that the electrical usage, number of students enrolled, the number of teachers/staffs employed, and the seating capacity of the gym would not change.

The amount of motor vehicle use, space and water heating, electricity consumption, natural gas combustion, electricity usage associated with water usage and wastewater discharge, and solid waste land filling and transport and landscape maintenance emissions would not be expected to change. Therefore, operational air quality impacts associated with the proposed project would be **less than significant**.

Cumulative Impacts

The BAAQMD *CEQA Air Quality Guidelines* recommend that cumulative air quality effects from criteria air pollutants also be addressed by comparison to the mass daily and annual thresholds. These thresholds were developed to identify a cumulatively considerable contribution to a significant regional air quality impact. As shown previously, the project-related construction and operational emissions would be below the significance thresholds. Therefore, the proposed project would not be cumulatively considerable and cumulative impacts would be **less than significant**.

Conclusion

As shown, the proposed project construction and operational emissions would be **less than the BAAQMD significance thresholds** per BAAQMD's *CEQA Air Quality Guidelines*.

- c) The HRA focuses on health impacts on existing residences from diesel equipment and haul truck emissions (DPM) associated with the proposed project construction activities. The proposed project would also locate sensitive receptors near existing permitted stationary sources and roadways. The HRA was conducted to determine the health impacts, in terms of excess cancer risk and non-cancer hazards, using the significance levels identified by the BAAQMD's *CEQA Air Quality Guidelines*. In accordance with the BAAQMD guidelines, the HRA also evaluated concentrations of PM_{2.5}. The HRA was

prepared in accordance with the California Office of Environmental Health Hazard Assessment (OEHHA)'s *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*. (OEHHA 2015.)

Construction Impacts on Existing Receptors

The maximum cancer risk from unmitigated project construction emissions for a residential-adult receptor would be 0.2 per million and for a residential-child receptor would be 4.1 per million.³ The maximum cancer risk from unmitigated project construction emissions for a school child receptor at Burlingame High School would be 5.8 per million and for a school teacher would be 1.5 per million.⁴ Thus, the cancer risk due to construction activities are below the BAAQMD threshold of 10 per million and would be a **less than significant impacts**. Nevertheless, the following measures are required by the BAAQMD to be implemented by the construction contractor:

BAAQMD Enhanced Exhaust Emissions Reduction Measures. The applicant shall implement the following measures during construction to further reduce construction-related exhaust emissions:

1. Where access to alternative sources of power are available, portable diesel engines shall be prohibited; and
2. All off-road equipment larger than 50 horsepower shall have engines that meet or exceed USEPA or CARB Tier 3 (or better) off-road emission standards and Level 3 Diesel Particulate Filters (DPF).⁵ Other measures may be the use of added exhaust devices, or a combination of measures, provided that these measures are approved by the City and demonstrated to reduce community risk impacts to less than significant.

Conclusion

Proposed project construction health impacts would be **less than significant**.

- d) The BAAQMD's significance criteria for odors are subjective and are based on the number of odor complaints generated by a project. Generally, the BAAQMD considers any project with the potential to frequently expose members of the public to objectionable odors to cause a significant impact. With respect to the proposed project, diesel-fueled construction

³ This theoretical individual would be born on construction year 1 and subsequently be exposed to the full construction period. Individuals born after construction year 1 would be exposed to shorter construction duration and thus, result in a lower risk and health impacts.

⁴ The buildings within Burlingame High School (classroom/library/main academic buildings) include air filter devices which are rated Minimum Efficiency Reporting Value (MERV)-13, in accordance with California Code of Regulations Title 24, Part 6. MERV-13 air filters are considered high efficiency filters able to remove 85 percent of PM_{2.5} from indoor air. MERV-13 air filters may reduce concentrations of DPM from mobile sources by approximately 50 percent. Therefore, maximum cancer risk from project construction emissions for a school child receptor and school-teacher receptor at Burlingame High School would be reduced to 2.9 per million and 0.7 per million within the indoor environment with the MERV-13 air filter system.

⁵ USEPA and CARB have implemented regulations and a tiering system to reduce emissions from off-road equipment with increasing combustion efficiency (i.e., decreasing emissions) where Tier 1 is the least efficient (greatest emissions) and Tier 4 is the most efficient (least emissions). The regulations have been implemented over time such that Tier 1 was phased out in the 1990's and Tier 2 was required, followed by implementation of Tier 3 and Tier 4 by 2015 with a phase out of Tier 2.

equipment exhaust would generate some odors. However, these emissions typically dissipate quickly and would be unlikely to affect a substantial number of people. The proposed project would not involve operational activities that generate odors. Therefore, odor impacts would be **less than significant**.

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

Background

The project site is currently fully developed with school buildings and facilities, in a developed suburban area. Based on habitat requirements and regional distribution, no State or federally Threatened or Endangered species are expected to occur on the project site. No sensitive habitats or plant communities for these occur on the project site. There are no trees on the project.

Site. No potential jurisdictional wetlands or Waters of the United States occur on the developed school site.

Discussion

- a) The project has no potential to affect migratory and nesting protected bird species due to its location in the central part of the developed school campus. No trees would be removed therefore no nesting or roosting habitat for sensitive bird or bat species would be affected by the project. **No impact** would occur.
- b) The project would not affect any riparian habitat or sensitive natural communities, as none of those are present on the site. **No impact** would occur.
- c) The project would not affect any wetlands habitats, as none of those are present on the site. **No impact** would occur.
- d) The project has no potential to impede any migration corridors. The proposed project is not expected to “interfere substantially with the movement of any native resident or migratory fish or wildlife species” because there is no habitat on the site and the proposed project would not substantially change the uses of the project site and area. With respect to native wildlife nursery sites, see tree discussion, above. **No impact** would occur.
- e) No trees would be removed as a result of the project. Therefore, **no impact** would occur.
- f) The project site is not covered by any federal, state, or local conservation plan. Therefore, the project would have **no impact** with respect to habitat conservation plan compliance.

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

The project site was graded for school facilities when the original school was constructed in the 1920's and for subsequent buildings (including the existing gym) through 1970's. While the original school buildings may be considered historic, the gym and locker room buildings are of recent construction and therefore not considered potentially historic.

Discussion

- a) As discussed above, the existing buildings on the site were constructed in the 1970's and remodeled in the 1990's. Consequently, the project site contains no historical resources as defined in CEQA Guidelines Section 15064.5. The project would not have the potential to affect any off-site historic resources due to its location internal to the school campus. Therefore, the project would have **no impact** on historical resources.
- b) The project would involve minor excavation for foundations and infrastructure. However the site has been previously disturbed for construction of the existing gym and tennis courts. Although the likelihood of project's grading and trenching, for utility lines and foundations to encounter and disturb archaeological resources is low, it is possible that prehistoric materials and sites could be encountered. Implementation of Mitigation Measures CULT-1 and CULT-2 would reduce this **potentially significant impact** to a **less-than-significant level**.
- c) Although no prehistoric or historic-era human remains are known to exist on the project site, it is possible that presently undocumented human interments may be uncovered during grading. Implementation of Mitigation Measures CULT-2 and CULT-2 would reduce this **potentially significant impact** to a **less-than-significant level**.

Mitigation Measures

Mitigation Measure CULT-1: Archaeological Deposits. If archaeological remains are encountered during project activities, project ground disturbances at the find and immediate vicinity shall be halted immediately until a qualified archaeologist can evaluate the finds (§15064.5 [f]). The archaeologist shall examine the finds and recommend mitigation measures which may include documentation in place, avoidance, testing, and/or data recovery. Project personnel should not collect cultural resources. Native American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies. In addition, as a precaution, the project shall include cultural resource sensitivity training for crews involved in grading activities, as well as construction monitoring by a qualified professional archaeologist during all ground disturbing activities.

Mitigation Measure CULT-2: Human Remains. California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code Section 7050.5 and Section 7052 and California Public Resources Code Section 5097.

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 county coroner and a qualified professional archaeologist. The 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 (NAHC) 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 would consult with a Most Likely Descendent 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.

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 that the new gym would be constructed to more stringent energy conservation standards, in compliance with current State of California energy conservation regulations. 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). 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 is intended to (1) reduce GHG emissions; (2) promote environmentally responsible, cost-effective, healthier places to live and work; and (3) reduce energy and water consumption. The project would-be built in accord with CALGreen standards and reduce water use by the installation of artificial turf athletic fields. 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:				
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	
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

Cleary Consultants, Inc (CCI) prepared a Geotechnical Hazards Review Report for the project (CCI 2022). That study included a literature review and exploratory soil borings. Relevant portions of the engineering report are summarized below.

Soil and Geologic Conditions

Burlingame High School is located on an alluvial plain on the southwest side of San Francisco Bay, about 3,000 feet from the current Bay margin and 1275 feet from Burlingame Lagoon, which was the historic bay margin. The site is underlain by alluvium composed of sand and silty and clayey sand, interbedded locally with silt, clay, and gravel.

Seismic Conditions

The site is located in the seismically active Bay Area. It is located about 2.7 miles northeast of the San Andreas fault, 9.5 miles northeast of the San Gregorio fault, 15.5 miles southwest of the Hayward fault, and 23.9 miles southwest of the Calaveras fault. In addition, the site is located about 1.75 miles southeast and 11.4 miles northwest of the northwest terminations of the potentially active Serra and Monte Vista faults, respectively. The probability of a major (6.0 Richter Magnitude or above) earthquake occurring on one or more of these faults by 2043 is 98%. During such an earthquake, strong seismic shaking is likely to occur at the site. No faults are mapped as crossing or within a half mile of the site, and the site is not in a fault rupture hazard zone as identified by the California Geological Survey. (CCI 2022.)

Discussion

- a)
 - i. The project sites is not located within an area that has been identified as an Alquist-Priolo Earthquake Fault Zone (Department of Conservation, 2016). No known fault lines are located on the project site. The nearest identified Earthquake Fault Zone is the San Andreas, which is located approximately 2.7 miles from the project site. Therefore, **no impact** would occur due to rupture of a known earthquake fault
 - ii. The site would be subject to strong ground shaking in the event of a major earthquake on any of the regional fault zones. However the new gym building will be built to current seismic safety requirements included in the Building Code. Therefore the new structure would likely be more earthquake-resistant than the existing gym structure. This impact would be **less than significant**.
 - iii. On the basis of seismically induced settlement calculations made by CCI for other projects on the Burlingame High School campus, CCI determined the earthquake-induced liquefaction potential at the site to be “low”. (CCI 2022) Therefore this impact would be **less than significant**.
 - iv. The site and adjacent lands are nearly level, so there would be no landslide or lateral spreading hazards and **no impact** would occur. (CCI 2022.)
- b) The site is nearly level so erosion hazards would not be substantial. However, if grading were to occur during the rainy season, erosion could result from the site. Mitigation Measure HYD-1, in the Hydrology and Water Quality section would reduce this potential impact to **less than significant**.

- c) On the basis of settlement calculations made by CCI for other projects on the Burlingame High School campus, it is not expected that there would be substantial differential settlement. Other ground instability hazards would be low, as discussed above. There would be a **less-than-significant impact** related to settlement. As discussed under item a, above, the potential for liquefaction onsite is low and impacts would be **less-than-significant** with implementation of implementation of Mitigation Measure GEO-1, below.
- d) Expansive soils shrink and swell with changes in moisture content and can exert significant expansion pressures on building foundations, interior floor slabs, and exterior flatwork. Sandy soils such as those mapped in the project area are typically not highly expansive. The impact would be **less-than-significant**.
- e) The proposed project would be served by the public 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 project excavation work would occur primarily within previously graded areas, and would not involve deep excavations, therefore potential impacts to paleontological resources are unlikely and would be considered **less than significant**.

Mitigation Measures

Mitigation Measure GEO-1. The project's site clearing, site preparation, subgrade preparation and stabilization, fill, drainage, and any foundation systems shall be designed and constructed per the specifications set forth in the project's Geotechnical Engineering Report.

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

This section is based on the *Air Quality Technical Report* (May 2022) prepared for the proposed project by RCH Group. This section describes construction and operational greenhouse gas (GHG) emissions impacts associated with the proposed project and is consistent with the methods described in the BAAQMD *CEQA Air Quality Guidelines* (May 2017).

“Global warming” and “global climate change” are the terms used to describe the increase in the average temperature of the earth’s near-surface air and oceans since the mid-20th century and its projected continuation. Warming of the climate system is now considered to be unequivocal, with global surface temperature increasing approximately 1.33 degrees Fahrenheit (°F) over the last 100 years. Continued warming is projected to increase global average temperature between 2 and 11°F over the next 100 years.

Gases that trap heat in the atmosphere are referred to as GHG because they capture heat radiated from the sun as it is reflected back into the atmosphere, much like a greenhouse does. The accumulation of GHG has been implicated as the driving force for global climate change. The primary GHG are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O), ozone, and water vapor.

While the presence of the primary GHG in the atmosphere are naturally occurring, CO₂, CH₄, and N₂O are also emitted from human activities, accelerating the rate at which these compounds occur within earth’s atmosphere. Emissions of CO₂ are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices, coal mines, and landfills. Other GHG include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes.

CO₂ is the reference gas for climate change because it is the predominant GHG emitted. The effect that each of the aforementioned gases can have on global warming is a combination of the mass of their emissions and their global warming potential (GWP). GWP indicates, on a pound-for-pound basis, how much a gas is predicted to contribute to global warming relative to how much warming would be predicted to be caused by the same mass of CO₂. CH₄ and N₂O are

substantially more potent GHG than CO₂, with GWP of 28 and 265 times that of CO₂, respectively. (IPCC 2014)

In emissions inventories, GHG emissions are typically reported in terms of pounds or metric tons of CO₂ equivalents (CO₂e). CO₂e are calculated as the product of the mass emitted of a given GHG and its specific GWP. While CH₄ and N₂O have much higher GWP than CO₂, CO₂ is emitted in such vastly higher quantities that it accounts for the majority of GHG emissions in CO₂e.

Discussion

- a) CalEEMod was used to quantify GHG emissions associated with project construction activities. The proposed project's estimated 30-year amortized annual construction related GHG emissions would be approximately 15.6 metric tons of CO₂e. There is no BAAQMD CEQA significance threshold for construction related GHG emissions. However, this value would be below the 2030 bright line GHG significance threshold of 660 metric tons per year. Therefore, this impact would be **less than significant**.
- b) California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500 - 38599). AB 32 established regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and establishes a cap on statewide GHG emissions. AB 32 required that statewide GHG emissions be reduced to 1990 levels by 2020. The state achieved 1990 levels in 2016 and the levels remained below 1990 levels through 2020. (CARB 2021.) In September of 2016, SB 32 extended the goals of AB 32 and set a goal to achieve reductions in GHG of 40 percent below 1990 levels by 2030. In 2017, CARB adopted the 2017 Scoping Plan, which identifies how the state can reach the 2030 climate target to reduce GHG emissions by 40 percent from 1990 levels, and substantially advance toward the state's 2050 climate goal to reduce GHG emissions by 80 percent below 1990 levels.

The project has been reviewed relative to the climate change policies and measures in CARB's *2017 Climate Change Scoping Plan* (CARB 2017) and it has been determined that the Project would not conflict with State GHG reduction goals. The project has also been reviewed relative to the GHG emission reduction measures in City of Burlingame's Climate Action Plan (CAP) update (City of Burlingame 2019) and it has been determined that the project would not conflict with the CAP. Therefore, impacts would be **less than significant**.

Since the project would be operational post 2020, the principal State plan and policy adopted for the purpose of reducing GHG emissions is SB 32. The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. Statewide programs such as the Low Carbon Fuel Standard and Renewables Portfolio Standard are delivering cleaner fuels and energy, the Advanced Clean Cars Program has put more than a quarter million clean vehicles on the road, and the Sustainable Freight Action Plan will result in efficient and cleaner systems to move goods throughout the State. (CARB 2017) The 2017 Scoping Plan enhances and implements these ongoing efforts to put the state on the path to achieving the 2030 target. These statewide programs are implemented at the statewide level, and compliance at the specific plan or project level is not addressed.

The assumption is that SB 32 and other regulations would be successful in reducing GHG emissions and reducing the cumulative GHG emissions statewide. The State has taken these measures, because no project individually could have a major impact (either positively or negatively) on the global concentration of GHG. Therefore, the project would result in a significant impact if it would be in conflict with the State regulations such as SB 32. Since the project would not conflict with the climate change policies and measures in the 2017 Scoping Plan or the City of Burlingame's CAP and is below bright-line GHG significance thresholds developed per the state's GHG reduction goals, the proposed project would not conflict with State regulations for reducing GHG emissions. Lastly, solar panels would be included on five buildings within Burlingame High School including the replacement gym as well as the installation of electric vehicle charging stations.

Given the previous information, the proposed project would have a less-than-significant impact related to a conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHG.

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

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.

Project operations would not involve the routine transport, use, or disposal of hazardous materials. Therefore it would not create a significant hazard to the public or the environment from such activities and impacts would be **less than significant**.

- b, d) A portion of the Burlingame High School Campus is a listed hazardous waste site due to PCBs and arsenic in the soil (database search performed April 19, 2022). The school site has been the subject of numerous hazardous substances contamination studies and remedial action plans from 2003 through the present time. These studies and clean-up activities are summarized on the California Department of Toxic Substances Control (DTSC) website⁶. In summary, A Preliminary Environmental Assessment (PEA, 2003/04) investigated the site for metals, organochlorine pesticides, polychlorinated biphenyl (PCB), total petroleum hydrocarbons, volatile organic compounds and metals. The PEA report identified lead and PCB around the main building, and elevated arsenic in the athletic field. DTSC issued further action for Lead/PCB, and additional investigation for the arsenic. In October 2008, DTSC approved the removal action completion report for lead/PCB and certified that there is no longer a risk posed by lead/PCB at the site.

The Remedial Action Completion Report (RACR) for Arsenic documents the excavation, encapsulation, and off-site disposal of soil contaminated with arsenic. Arsenic-impacted soil remains at Areas C, D2, E, F, and G3. The remediation areas are: Area C-Landscaped areas; Area D-track side and Carolyn Avenue [D1 (near gym) and D2 (near Carolan Avenue)]; Area E-Front Lawn; Area F-Parkway [F1 (near the vicinity of the school track and softball fields) and F2 (near the vicinity of the front lawn)]; and Area G-fence line and Home Economics lawn [G1 (fence line near field), G2 (near Home Economic Building and Multi-use Building), and G3 (fence line near classrooms)]. All arsenic mitigation activities were completed in January 2009. Area A and G1 were the only areas where arsenic impacted soil was able to be completely removed, and cleanup goal was met. Areas C, D2, E, F and G3 are required to be managed in an Operation and Maintenance (O&M) Plan. In addition, some sidewall samples in Areas B, D1 and G2 contained arsenic concentrations above the Site clean-up screening level and will also be required to be managed in an Operations and Management (O&M) Plan.

The contaminated areas are subject to DTSC monitoring and 5-year Reviews. with updates to the O&M plan as needed. Most recently, On July 26, 2021, DTSC approved a modified O&M Plan that included the following:

- DTSC agreed to suspend quarterly inspections;

⁶ http://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41820008

- Annual inspections of paved and unpaved areas (measure depth to fabric) to be performed by the O&M Coordinator;
- 5-year inspections to be performed by the O&M Coordinator, O&M Professional, and DTSC Project Manager;
- Annual Land Use Covenant (LUC) reporting to be submitted by the O&M Coordinator; and,
- 5-year Reporting (with photos) to be submitted by the O&M Coordinator and O&M Professional.

Land use covenants would ensure that no hazards would be created to either workers or children/teachers at the school during construction. As specified in the O&M Plan (Locus, 2015), arsenic-intrusive work activities require notification to DTSC and preparation of a completion report if the duration is seven days or longer. Therefore, any excavation in contaminated areas would be reviewed and cleared by the California Department of Toxic Substances Control prior to approval.

A pre-demolition asbestos and lead inspection was conducted for the locker rooms / gymnasium buildings (NorBay Consulting, Pre-Demolition Asbestos and Lead Inspection, Locker Rooms / Gymnasium Buildings, Burlingame High School, Burlingame, CA July 7, 2022). A total of 42 samples of suspect asbestos containing building materials were collected during this inspection and an earlier inspection conducted by NorBay Consulting in 2009. Upon analysis, the following materials were found to contain varying percentages of asbestiform minerals or are materials known to contain asbestos.

- 9" vinyl floor tile and associated mastic in the Training Room storage area. The asbestos-containing black mastic is also located under the 12" vinyl floor tile in this room.
- Asbestos blown in insulation in the attic above the locker rooms and locker room offices. The majority of this material has previously been remediated, but some remains on the rough plaster deck and in between the walls of the offices below.

A total of 11 readings were collected of interior painted/coated surfaces during the inspection. In addition, 6 calibration readings were also collected. For this report lead based paint includes readings ≥ 1.0 mg/cm², lead-containing paint includes readings ≥ 0.1 to ≤ 1.0 mg/cm² and no lead detected includes readings of 0.0 mg/cm². No lead-based paint/glazing was located on any of the structures' components/fixtures.

The asbestos-containing materials could cause a **potentially significant** health risk during demolition if not properly treated. Mitigation Measure HAZ-1 would reduce this impact to **less than significant**.

- c) As described under response to question IX a, above, the project operations would not involve the use of hazardous materials on campus, and construction use of such materials would be carefully implemented in compliance with all applicable regulations. The

construction site would be fenced and no student access would be permitted. Therefore, the project would have a **less-than-significant** potential to significantly affect children or adults at the school.

- e) The project site is approximately two miles southwest of San Francisco International Airport's southernmost runways. Given the distance from the airport, the relatively low height of the proposed new buildings (2-story maximum), and because the project would not change the land use on campus, 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 City of Burlingame's emergency response because it is the replacement of an existing building on the existing school campus. Construction would be limited to the existing high school, and traffic would not be substantially affected by the project. **No impact** would occur.
- g) The project is in a developed urban area. It is surrounded by urban uses and there are no wildfire-hazard areas in the vicinity of the site. Therefore, the project would have **no impact** with respect to wildfire hazards.

Mitigation Measures

Mitigation Measure Haz-1: All of the asbestos-containing materials identified in the NorBay survey (floor tiles, mastic, and insulation) shall be remediated by a licensed asbestos remediation contractor prior to demolition activities taking place that would disturb them. The contractor chosen must be familiar with and abide by the strict rules and regulations regarding the removal, packaging and disposal of asbestos- containing materials.

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) The City of Burlingame's stormwater runoff is controlled by the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), which was established in 1990 to reduce the pollution carried by stormwater into local creeks, the San Francisco Bay, and the Pacific Ocean. The program is a partnership of the City/County Association of Governments (C/CAG), each incorporated city and town in the county, and the County of San Mateo, which

share a common National Pollutant Discharge Elimination System (NPDES) permit. The Federal Clean Water Act and the California Porter-Cologne Water Quality Control Act require that large urban areas discharging stormwater into the San Francisco Bay or the Pacific Ocean have an NPDES permit to prevent harmful pollutants from being dumped or washed by stormwater runoff, into the stormwater system, then discharged into local waterbodies. The County and the 20 cities and towns in San Mateo County are all permittees under one regional urban stormwater NPDES permit, which also regulates municipalities in Contra Costa, Alameda, and Santa Clara Counties, as well as the cities of Fairfield, Suisun City, and Vallejo.

The Municipal Regional Permit (MRP) outlines the State's requirements for municipal agencies in San Mateo County to address the water quality and flow-related impacts of stormwater runoff. Some of these requirements are implemented directly by municipalities while others are addressed by the San Mateo Countywide Water Pollution Prevention Program on behalf of all the municipalities. The MRP is a comprehensive permit that requires activities related to construction sites, industrial sites, illegal discharges and illicit connections, new development, and municipal operations. The permit also requires a public education program, implementing targeted pollutant reduction strategies, and a monitoring program to help characterize local water quality conditions and to begin evaluating the overall effectiveness of the permit's implementation.

The project site is relatively flat and covered with the existing gym and tennis court. Development of the proposed project would require disturbance and some grading for the new foundation and utilities, as described in the Project Description. No substantial topographic changes would be required to construct the new gym.

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 local stormwater system, which ultimately discharges to San Francisco Bay. Small quantities of pollutants 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 Countywide MRP. The District would be required to develop and implement a SWPPP that identifies appropriate construction BMPs in order to minimize potential sedimentation or contamination of storm water runoff generated from the project site. 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.

The SWPPP must 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 filter fabric/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 goal of Provision C.3 of the MRP is for the municipalities regulated by the permit to use their permitting authority to include appropriate source control, site design, and stormwater treatment measures in new development and redevelopment projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from these projects. This goal is primarily accomplished through the implementation of low impact development (LID) techniques.

The project site is about 1.15 acres (50,000 square feet). Currently the site is covered with impervious surfaces. Therefore, the project would not result in an increase of in impervious area. Therefore, impacts to runoff quantities would be **less than significant**.

Implementation of the Construction General Permit requirements described above, as well as Mitigation Measures HYD-1 and HYD-2, below, would reduce water quality impacts to a **less-than-significant** level.

- b) The City of Burlingame purchases all of its water from the San Francisco Public Utilities Commission (SFPUC). The SFPUC's major water source originates from Yosemite National Park snowmelt flowing down the Tuolumne River to storage in Hetch Hetchy Reservoir, in addition to some more local surface water sources in the East Bay and Peninsula. The SFPUC does not rely substantially on groundwater.

The project would replace the existing gym and therefore not increase water demand. As such, it would not conflict with any groundwater management plan, and **no impact** would result.

- d) The Federal Emergency Management Agency (FEMA) has mapped the site as an "Area of Reduced Flood Risk Due to Levee Zone X". (FEMA 2022) Therefore, flooding impacts to the new facilities would be **less than significant**.

The project site is not mapped as being within a dam failure area. (San Mateo County, undated.) Therefore, the project would not be subject to flood hazards from that source. **No impact** would occur.

Seiches and tsunamis are seismically induced large waves of water. Because of the distance of the site from the San Francisco Bay and Pacific Ocean, the absence of steep slopes above the site, and the elevation of the site, there is no potential for a tsunami, seiche, or mudflow to affect the project site. Therefore, the proposed project would have no impact to future occupants of the project from these hazards, and **no impact** would occur.

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, which shall identify pollution prevention measures and practices to prevent polluted runoff from leaving the project site.

Mitigation Measure HYD-2: The District shall maintain in perpetuity the post-construction BMPs listed in the Low Impact Design plans developed for the project. The District shall make changes or modifications to the LID measures to ensure peak performance. The District shall be responsible for costs incurred in operating, maintaining, repairing, and replacing any stormwater quality improvements and features. The owner shall conduct inspection and maintenance activities and complete annual reports.

XI. 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 athletic facility improvements are proposed for existing facilities on an existing high school campus. Because the project would not change the existing land use but would instead upgrade the existing athletic facilities onsite, the project would not create conflicts between uses or divide an established community, there would be **no impact**.
- b) The project would not change the existing land use on site and would therefore 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**.

XII. 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 Burlingame General Plan as a site containing mineral resources that would be of local, regional, or statewide importance. Therefore, the project would not 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 construction-grade aggregate resources (used in concrete). The project site does not contain any known mineral deposits or active mineral extraction operations. Therefore, the project would have **no impact** on 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

A detailed noise analysis was conducted for the project by the RCH Group (RCH 2022). The discussion below is excerpted from that analysis.

Noise Descriptors

Noise can be defined as unwanted sound. It is commonly measured with an instrument called a sound level meter. The sound level meter captures the sound with a microphone and converts it into a number called a sound level. Sound levels are expressed in units of decibels.

To correlate the microphone signal to a level that corresponds to the way humans perceive noise, the A-weighting filter is used. A-weighting de-emphasizes low-frequency and very high-frequency sound in a manner similar to human hearing. The use of A-weighting is required by most local General Plans as well as federal and state noise regulations (e.g. Caltrans, EPA, OSHA and HUD). The abbreviation dBA is sometimes used when the A-weighted sound level is reported.

Several time-averaged scales represent noise environments and consequences of human activities. The most commonly used noise descriptors are the equivalent A-weighted sound level over a given time period (Leq)⁷; average day-night 24-hour average sound level (Ldn)⁸ with a

⁷The Equivalent Sound Level (Leq) is a single value of a constant sound level for the same measurement period duration, which has sound energy equal to the time-varying sound energy in the measurement period.

⁸Ldn is the day-night average sound level that is equal to the 24-hour A-weighted equivalent sound level with a 10-decibel penalty applied to night between 10:00 p.m. and 7:00 a.m.

nighttime increase of 10 dB to account for sensitivity to noise during the nighttime; and community noise equivalent level (CNEL)⁹, also a 24-hour average that includes both an evening and a nighttime sensitivity weighting. Table NOISE-1 identifies decibel levels for common sounds heard in the environment. With regard to increases in A-weighted noise level, the following relationships occur (Caltrans, 1998a):

- Under controlled conditions in an acoustics laboratory, the trained healthy human ear is able to discern changes in sound levels of 1 dB;
- Outside of such controlled conditions, the trained ear can detect changes of 2 dB in normal environmental noise;
- It is widely accepted that the average healthy ear, however, can barely perceive noise levels changes of 3 dB;
- A change in level of 5 dB is a readily perceptible increase in noise level; and
- A 10-dB change is recognized as twice as loud as the original source.

Table NOISE-1. Typical Noise Levels

Noise Level (dB)	Outdoor Activity	Indoor Activity
90+	Gas lawn mower at 3 feet, jet flyover at 1,000 feet	Rock Band
80-90	Diesel truck at 50 feet	Loud television at 3 feet
70-80	Gas lawn mower at 100 feet, noisy urban area	Garbage disposal at 3 feet, vacuum cleaner at 10 feet
60-70	Commercial area	
40-60	Quiet urban daytime, traffic at 300 feet	Large business office, dishwasher next room
20-40	Quiet rural, suburban nighttime	Concert hall (background), library, bedroom at night
10-20		Broadcast / recording studio
0	Lowest threshold of human hearing	Lowest threshold of human hearing

SOURCE: Modified from Caltrans Technical Noise Supplement, 1998

Vibration is an oscillatory motion which can be described in terms of the displacement, velocity, or acceleration. The peak particle velocity (PPV) is the descriptor used in monitoring of construction vibration.

⁹CNEL is the average A-weighted noise level during a 24-hour day, obtained by addition of 5 decibels in the evening from 7:00 to 10:00 p.m., and an addition of a 10-decibel penalty in the night between 10:00 p.m. and 7:00 a.m.

Noise Attenuation

Stationary point sources of noise, including construction equipment, attenuate (lessen) at a rate of 6 to 7.5 dB per doubling of distance from the source, depending on ground absorption. Soft sites attenuate at 7.5 dB per doubling because they have an absorptive ground surface such as soft dirt, grass, or scattered bushes and trees. Hard sites have reflective surfaces (e.g., parking lots or smooth bodies of water) and therefore have less attenuation (6.0 dB per doubling). A street or roadway with moving vehicles (known as a “line” source), would typically attenuate at a lower rate, approximately 3 to 4.5 dB each time the distance doubles from the source, that also depends on ground absorption (Caltrans, 1998b). Physical barriers located between a noise source and the noise receptor, such as berms or sound walls, would increase the attenuation that occurs by distance alone. Noise from large construction sites (or a landfill with heavy equipment moving dirt and solid waste daily and trucks entering and exiting the main gate daily – activities similar to construction sites) would have characteristics of both “point” and “line” sources, so attenuation would probably range between 4.5 and 7.5 dB per doubling of distance.

City of Burlingame Municipal Code

The *Building Construction* section of the City’s Municipal Code establishes daily hours for construction in the City. §18.07.110 states that no person shall erect (including excavation and grading), demolish, alter or repair any building or structure other than between the hours of 8:00 a.m. and 7:00 p.m. on weekdays, and 9:00 a.m. and 6:00 p.m. on Saturdays, except in the case of urgent necessity in the interest of public health and safety, and then only with written approval from the building official, which approval shall be granted for a period not to exceed three (3) days for projects including structures with a gross floor area of less than 40,000 square feet; and when reasonable to accomplish the erection, demolition, alteration or repair, not to exceed twenty (20) days for projects including structures with a gross floor area of 40,000 square feet or greater. No person shall erect (including excavation and grading), demolish, alter or repair any building or structure on Sundays or on holidays.

The City of Burlingame also sets noise limits and operational requirements for mechanical equipment in §25.31.080. According to this section, mechanical equipment shall include machines and devices, including HVAC units, fans, vents, generators and elevator motors, integral to the regular operation of climate control, electrical and similar building systems. Mechanical equipment shall not exceed a maximum daytime (7:00 a.m.–10:00 p.m.) outdoor noise level of 60 dBA or a maximum nighttime (10:00 p.m.–7:00 a.m.) outdoor noise level of 50 dBA as measured at the receiving property.

Sensitive Receptors

The City of Burlingame General Plan’s Community Safety Element identifies noise sensitive land uses as homes, schools, hospitals, libraries, religious institutions, and convalescent homes. The portion of the campus containing the Project site is surrounded by other school uses. There are homes directly northeast and north of the overall campus. The nearest home to the northeast would be located approximately 440 feet away. The nearest home to the north would be located approximately 500 feet away. These are the distances from the center of the Project site to the nearest receptor property lines.

Existing Noise Environment

To quantify existing ambient noise levels, this noise study included five short-term (10- to 20-minute) noise measurements in and around the Project site. A Larson Davis SoundTrack LxT Sound Level Meter calibrated before and after the measurements was used for the short-term measurements. Table NOISE-2 summarizes the locations and results of the noise measurements. Based on observations from the short-term measurements, the main sources of noise in and around the Project site included nearby rail noise, traffic noise from Oak Grove Avenue, Chatham Road, overhead aircraft, students, birds and pedestrians.

Table NOISE-2. EXISTING Noise Levels

Location	Time Period	Noise Levels (dB)	Noise Sources
Site 1: 50 feet east of the existing gymnasium.	Monday May 9, 2022 11:07 a.m. to 11:17 a.m.	5-minute Leq's: 58, 62	Car passbys up to 80 dB, students walking nearby 65 dB, birds 50 dB, school bell 49 dB.
Site 2: 65 feet south of the existing gymnasium	Monday May 9, 2022 11:21 a.m. to 11:36 a.m.	5-minute Leq's: 53, 56, 53	Train horn 78 dB, students walking nearby 60 dB, birds 49 dB.
Site 3: High school entrance, approximately 250 feet east of the existing gymnasium.	Monday May 9, 2022 11:38 a.m. to 11:48 a.m.	5-minute Leq's: 60, 57	Helicopter overhead 84 dB, distant school bell 45 dB.
Site 4: Homes along Oak Grove Avenue, directly north of the High School's property line.	Monday May 9, 2022 10:26 a.m. to 10:46 a.m.	5-minute Leq's: 61, 55, 65, 54	Car passbys 85 dB, nearby train 80 dB.
Site 5: Homes along Chatham Road, north of the High School.	Monday May 9, 2022 10:51 a.m. to 11:01 a.m.	5-minute Leq's: 60, 54	Car passbys 77 dB, airplane overhead 62 dB, pedestrians walking 55 dB.

Source: RCH Group, 2022

Discussion

a) **Construction Noise Impacts.**

The Project has a tentative construction start date of May 2023, with completion anticipated by January 2025. Construction would result in a temporary increase in ambient noise levels in the vicinity of the Project that would last for about 1.5 years. Noise levels generated by construction equipment would vary greatly depending upon factors such as the type and

specific model of the equipment, the operation being performed, the condition of the equipment and the prevailing wind direction.

The nearest home to the northeast would be located approximately 440 feet away. The nearest home to the north would be located approximately 500 feet away. These are the distances from the center of the Project site to the nearest receptor property lines. The maximum noise levels at 440 feet and 500 feet for various types of construction equipment that could be used during construction are provided in Table NOISE-3.

Table NOISE-3. Typical Noise Levels from Construction Equipment (L_{max})

Construction Equipment	Noise Level (dB, L_{max} at 50 feet)	Noise Level (dB, L_{max} at 440 feet)	Noise Level (dB, L_{max} at 500 feet)
Dump Truck	76	52	51
Air Compressor	78	54	53
Backhoe	78	54	53
Dozer	82	58	57
Compactor (ground)	83	59	58
Excavator	81	57	56
Flat Bed Truck	74	50	49
Grader	85	61	60
Generator	81	57	56
Roller	80	56	55
Vibratory Concrete Mixer	80	56	55
Concrete Mixer Truck	79	55	54
Jackhammer	89	65	64
Front End Loader	79	55	54

Notes:

L_{max} = maximum sound level

SOURCE: Federal Highway Administration (FHWA) Roadway Construction Noise Model User's Guide, 2006.

As discussed in the Project Description, equipment used during construction would vary by phase, but would include excavators, backhoes, dump trucks, graders, compactors, water trucks, and similar equipment, as well as cement trucks, and various power equipment for building construction. Construction equipment would not all operate at the same time or location. However, several types of construction equipment would typically be in operation at the same time. Table NOISE-4 provides typical construction noise levels for different phases of construction.

Table NOISE-4. Typical Construction Activities Noise Levels

Construction Equipment	Noise Level (dB, Leq at 50 feet)
Ground Clearing	84
Excavation	89
Foundations	78
Erection	85
Finishing	89

Notes:

Average noise levels correspond to a distance of 50 feet from the noisiest piece of equipment associated with a given phase of construction and 200 feet from the rest of the equipment associated with that phase.

Leq= equivalent sound level

SOURCE: U.S. Environmental Protection Agency, Legal Compilation, 1973.

The standards for construction in the City of Burlingame's Municipal Code are for the hours of construction and not the decibel noise level. The proposed project includes a 7:00 a.m. construction start time, so construction crews would be on-site before the 8 a.m. start time in the Burlingame Noise Ordinance. While the Noise Ordinance would not apply to the school property, it is used as a significance criterion for noise.

Construction equipment would not all operate at the same time or location. However, several types of construction equipment would typically be in operation at the same time. An excavator, loader, and dump truck were analyzed together for construction noise impacts (due to their likelihood of being used in conjunction with one another for grading and demolition operations). The construction noise modeling is included in the Noise Appendix.

Due to the proximity of nearby school buildings on-site, construction activities have the potential to disrupt school activities or cause annoyance to on-site students, teachers, and staff. Because the construction is a SMUHSD project, the District could implement any needed changes to the construction schedule and activities if construction activities are disrupting school activities.

Based on the distance from Project construction to the nearest homes, noise from grading operations using an excavator, loader, and dump truck was estimated to be 61.0 dB, Leq once it reaches the nearest home's front yard on Oak Grove Avenue (Site 4), and 59.9 dB, Leq once it reaches the nearest home's backyard on Chatham Road (Site 5). As shown in **Table 2**, the existing background noise levels at Sites 4, 5 were up to 60-65 dB, Leq during the measurements. Because the estimated noise levels for construction would be similar to

or less than existing noise levels, the construction would have minimal impact on the noise levels at off-site adjacent residences. Regardless, major construction equipment noise would be evident to the nearby residences, and if it occurs outside of the City's Noise Ordinance hours (8 am start), the noise impact would be **significant**. With implementation of Mitigation Measure **NOI-1**, the project noise impact from construction would be **less than significant**.

Operational Noise Impacts

Once operational, the Project would not generate more noise than existing noise currently generated by the existing campus gymnasium (See Table Noise-2 for ambient noise levels at existing gymnasium). The Project would not change or expand any uses of the gym compared to existing use types. The Project would not result in an increase in student enrollment or staffing. Final project design and development review would comply with the City's noise limits and operational requirements for mechanical equipment in §25.31.080 of the City's Municipal Code and would implement design features for mechanical equipment to not exceed the City's noise limits. Final design of the HVAC equipment would need to meet the most conservative threshold, which is the maximum nighttime (10:00 p.m.–7:00 a.m.) outdoor noise level of 50 dBA as measured at the adjacent receiving properties. Due to the distance to the nearest off-site receptors, and existing noise measurements, operational noise from stationary equipment would be well below the nighttime standard of 50 dBA at adjacent receiving properties. Therefore, operational noise would be a **less-than-significant** impact.

- b) Construction activities have the potential to result in varying degrees of temporary ground vibration, depending on the specific construction equipment used and operations involved. In most cases, vibration induced by typical construction equipment does not result in adverse effects on people or structures (Caltrans, 2013). Vibrational effects from typical construction activities are only a concern within 25 feet of existing structures (Caltrans, 2002). There are no structures within 25 feet of the proposed construction site. Therefore, vibration would be a **less-than-significant** impact.
- c) The Project site is not within the vicinity of a private airstrip or an airport land use plan, or within 2 miles of a public use airport. The nearest airport is San Francisco International Airport (the nearest runway of which is approximately 2.5 miles northwest of the Project site). Therefore, the Project would have **no impact** from airport noise.

Mitigation Measures

Mitigation Measure NOISE-1: The Project shall develop a set of site-specific noise reduction measures. Noise reduction measures may include, but are not limited to, the following:

- All construction equipment shall be properly maintained and in good order.
- Major noise-generating construction equipment activity (> 75 dB at 50 feet) shall be limited to the hours of 8:00 a.m. and 7:00 p.m. on weekdays and on Saturdays

between the hours of 9:00 a.m. and 6:00 p.m. Construction shall not be permitted on Sundays or on holidays.

- Prior to construction activities, the Project shall designate a "Construction Noise Coordinator" who would be responsible for responding to any local complaints about construction noise and vibration. The Construction Noise Coordinator shall determine the cause of the complaint and shall require implementation of reasonable measures to correct the problem. The telephone number for the Construction Noise Coordinator shall be conspicuously posted at the construction site.
- At least three weeks prior to the start of construction activities, the Project shall provide written notification to all nearby residential units within 500 feet of the construction site informing them of the estimated start date and duration of construction activities, the role of the Construction Noise Coordinator, and how to contact the Construction Noise Coordinator.

XIV. 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 gym replacement project would not directly or indirectly increase population growth because no new housing or permanent jobs are proposed as part of the project. The project site and surrounding areas 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 contains an existing high school gym and tennis court, with no housing. The proposed project would not displace existing housing or people, so there would be **no impact**.

XV. 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 Central County Fire Department (CCFD) provides fire protection and emergency medical services for the project site. The fire station nearest the project site is Station 34, located at 799 California Avenue, approximately three blocks northwest of the site. Replacement of the existing gym would not materially alter uses of the site, and therefore would not result in a substantive increase in demand for fire protection services. The project would not require the provision of or need for new or physically altered facilities to continue to serve the project site as the new gym would include current fire protection components as required under current codes. Therefore, the project would have **no impact** to fire protection services.
- b) Burlingame High School is served by the City of Burlingame Police Department, located at 1111 Trousdale Drive, about a mile northwest of the school. As discussed for fire, above, the project would be a replacement of an existing gym, and therefore would not increase the need for police services. No new police facilities would be required. Therefore, **no impact** would occur to police services.
- c) The proposed facilities would not increase the population or otherwise increase demands for school services. It would not alter the capacity of students at Grant Union High School. 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** on other facilities.

XVI. 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 adverse impact** on parks and other recreational facilities and, in fact, would improve recreation facilities at the school. Therefore, the project would not cause physical deterioration of any recreational facility to occur or be accelerated.
- b) The project includes upgrades to the school athletic facilities, which are evaluated by topic in this document. The project would not require the construction or expansion of other recreational facilities. **No impacts** would occur that are not already addressed elsewhere in this IS.

XVII. Transportation/Traffic

Would the Project:

Environmental Issue	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit roadways, pedestrian and bicycle facilities?				X
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (vehicle Miles traveled)?			X	
c) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

Discussion

- a) The project would not alter uses or any traffic routes compared to existing conditions at the school. Minor construction traffic would not conflict with program, plan, ordinance or policy addressing the circulation system, including transit roadways, pedestrian and bicycle facilities. Therefore, the project would have **no impact** with respect to any such plan or policy, or underlying circulation systems.
- b) With the passage of Senate Bill SB 743 in 2013 and full implementation on July 1, 2020, Vehicle Miles Traveled (VMT) became the main metric to evaluate transportation impacts of proposed development projects. Traffic LOS and parking deficiencies are no longer considered significant impacts in CEQA analysis.

With SB 743, most development projects need to provide a VMT analysis to determine traffic impacts. However, there are several exceptions. These include small projects that generate fewer than 110 daily trips; locally serving retail and similar land uses; and locally serving public facilities such as public schools and parks.

As discussed above, the project is a replacement for the existing school gym and would not result in additional athletic activities and events that would change the current traffic circulation patterns and operations in the area. The project will not add new driveways or parking. The project is public high school gymnasium that mainly serves the students from within the school and, as such, would be exempt from VMT analysis. According to the Governor's Office of Planning and Research (Technical Advisory on Evaluating Transportation Impacts in CEQA, April 2018), similar to small projects, locally serving retail

and land uses, and local-serving public facilities, including schools, are presumed to have a less than significant impact on VMT. As indicated above, the project is not a new project but the replacement of an existing facility and would be mainly used by the school. As such, the VMT impact of the project would be **less than significant**.

- c, d) Because the proposed project would not introduce new design features or other changes that are incompatible with the existing transportation infrastructure or otherwise adversely affect emergency access, it would not create any traffic hazards and **no impact** would occur.

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:				
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

The existing school on the site was constructed in the 1920's, and the site was disturbed again with construction of the existing gym, locker rooms, and tennis courts in the 1970's through the 1990's. The entire project site was graded at the time of construction and has been in use as a school use. The project site also is surrounded by suburban land uses and not near any streams or other areas where Native American habitation are likely to have occurred. There is no undisturbed land on or near the site.

Discussion

- a) i., ii. As described in the Cultural Resources section of the IS, because the site has already been graded and is the location of an existing high school facility, and because the project would have minimal earthmoving beyond the previously graded depths,

impacts to culturally sensitive sites would be unlikely. Additionally, Mitigation Measures CULT-1 and CULT -2, in the Cultural Resources section would address impacts on any unknown cultural resources and would assure that any potential tribal cultural resource impacts would be reduced to **less than significant**.

XIX. 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 Burlingame has contracted with Veolia Water North America to provide wastewater collection, treatment, and disposal services for the project area. The wastewater treatment facility located at 1103 Airport Boulevard has a designed capacity to treat 5.5 MGD (million gallons per day) of wastewater per day and 16 MGD during wet weather.

The City of Burlingame purchases all of its water from the San Francisco Public Utilities Commission (SFPUC). The SFPUC's major water source originates from Yosemite National Park snowmelt flowing down the Tuolumne River to storage in Hetch Hetchy Reservoir, in addition to some more local surface water sources in the East Bay and Peninsula.

Burlingame is part of a regional Joint Powers Authority (JPA) that manages solid waste collection and recycling services for several cities. Under California law, the JPA is required to divert waste from landfills (recycle and reduce) to achieve State waste reduction and pollution prevention

goals. Burlingame residents, businesses, and local institutions have shown a clear commitment to reducing the waste stream, having achieved a 60 percent waste diversion rate as of 2016. The City of Burlingame contracts with Recology of San Mateo County to provide for residential and commercial solid waste pickup. Refuse collected in the project area and not recycled or composted is transported to transfer stations and then to the Ox Mountain Landfill near Half Moon Bay.

Discussion

- a, b, c) The project would replace an existing gym and locker room buildings with similar use buildings. Therefore, the proposed project would not change water use at the school, and **no impact** would occur to water supplies or associated facilities. Similarly, the quantity of sewage generated is not expected to change substantially from that generated by the existing gym facilities. These facilities would discharge to the City of Burlingame's existing lines. The City would review and approve the new gym's wastewater connection, however, because of the minimal, if any, increase in sewage anticipated to be generated by the project, any impacts are expected to be **less than significant**.
- d, e) Because the project would replace the existing gym facilities on the site, there would be no increase in solid waste generation as a result of project operation. Solid wastes would be generated during demolition of the existing buildings and construction of the new buildings. As much of this material would be reused and composted of as feasible. Therefore, the project would have **a less-than-significant impact** on solid waste generation or disposal.

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 in a heavily developed urban area designated as a “Non-Very High Fire Hazard Zone” by CalFire¹⁰. The site is level and does not require installation of wildfire-hazard related infrastructure. Therefore, the project would have **no impact** with respect to wildfire hazards, associated hazards, and equipment /infrastructure needs.

¹⁰ https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf

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) Compliance with the mitigation measures for the unearthing of any unknown cultural resources would ensure all potential impacts associated with cultural resources would be reduced to a **less-than-significant** level. No other potentially significant impacts were identified in this IS.
- b) No other projects are proposed at the school that would overlap this project. Based on a review of the City of Burlingame, there are currently two proposed development projects in the project area: the approximately 34,000 sq. ft. 250 California Drive Mixed Use Office project and the 220 Park Road project, with 140,000 sq. ft. of office and 16,000 sq. ft. of retail. However, both of these projects would be located on the west side of the Carolan Avenue/railroad tracks/California Drive corridor from the school, which also is set back from Carolan Avenue. Due to this distance and the limited construction associated with the proposed project, the project's contribution to cumulative construction impacts (i.e. noise, air quality, traffic) would not be cumulatively considerable and would be **less than significant**. In addition, the project would not increase operational impacts over existing conditions. Todd- any other overlapping projects planned at BHS?
- c) The proposed project would not increase long-term air pollutant emissions and greenhouse gasses because it would not add any net new workers. The project's noise

impacts also would be less than significant with mitigation. The project's hazards to human health and safety would be less than significant with mitigation, as described in Section VIII of this Initial Study. The impact would be reduced to a **less-than-significant** level with mitigation.

V. REFERENCES

California Air Pollution Officers Association, *California Emissions Estimator Model User's Guide*, May 2021, <http://www.caleemod.com/>

California Air Resources Board (CARB), California's 2017 Climate Change Scoping Plan, November 2017
https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf

California Air Resources Board, *Emissions Trends Report 2000-2019 (2021 Edition)*,
<https://ww2.arb.ca.gov/ghg-inventory-data>

California Department of Toxic Substances Control,
http://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41820008 Accessed April 19, 2022.

City of Burlingame, 2030 *Climate Action Plan Update*, August 28, 2019,
https://www.burlingame.org/document_center/Sustainability/CAP/Climate%20Action%20Plan_FINAL.pdf

Cleary Consultants, Inc, Preliminary Geologic Hazards Review, New Gymnasium Building Project, Burlingame High School, July 12, 2022

Federal Emergency Management Agency (FEMA) FIRM Flood Hazard Maps. Accessed April 22, 2022.
https://cms6.revize.com/revize/burlingamecity/document_center/Stormwater/FEMA%20Brochures/06081C0153F.pdf; <https://msc.fema.gov/portal/search?AddressQuery=1400%20grand%20avenue%20sacramento%20ca#searchresultsanchor>.

Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, May 2017,
http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en

IPCC, 2014: *Climate Change 2014: Synthesis Report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*,
https://www.ipcc.ch/site/assets/uploads/2018/05/SYR_AR5_FINAL_full_wcover.pdf

Office of Environmental Health Hazard Assessment (OEHHA). *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments*, February 2015.

RCH Group, Inc. Burlingame High School Gym Replacement Project, Noise Technical Report, May 13, 2022.

San Mateo County, Dam Failure Inundation Areas, undated,
<https://www.smcgov.org/media/73061/download?inline=>

VI. REPORT PREPARERS

San Mateo Union High School District

Yancey Hawkins, Deputy Superintendent, Business Services

Grassetti Environmental Consulting

Richard Grassetti, Principal

Paul Miller, RCH Group, Air Quality/Noise Specialist

Dan Jones, RCH Group, Air Quality Specialist

Richard Denney, Graphics

Greystone West Company

Todd Lee, Principal

APPENDIX A: NOISE REPORT

APPENDIX B: MITIGATION MONITORING AND REPORTING PROGRAM

MITIGATION MONITORING AND REPORTING PROGRAM – BURLINGAME HIGH SCHOOL GYM 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>CULTURAL RESOURCES</i>						
Potential impacts to archaeological deposits and human remains	<p><i>Mitigation Measure CULT-1: Archaeological Deposits.</i> If archaeological remains are encountered during project activities, project ground disturbances at the find and immediate vicinity shall be halted immediately until a qualified archaeologist can evaluate the finds (§15064.5 [f]). The archaeologist shall examine the finds and recommend mitigation measures which may include documentation in place, avoidance, testing, and/or data recovery. Project personnel should not collect cultural resources. Native American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies. In addition, as a precaution, the project shall include cultural resource sensitivity training for crews involved in grading activities, as well as construction monitoring by a qualified professional</p>	SMUHSD Project Manager	SMUHSD Project Manager	Construction contractors shall monitor during 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
	<p>archaeologist during all ground disturbing activities.</p> <p><i>Mitigation Measure CULT-2: Human Remains.</i> California law recognizes the need to protect interred human remains, particularly Native American burials and associated items of patrimony, from vandalism and inadvertent destruction. The procedures for the treatment of discovered human remains are contained in California Health and Safety Code Section 7050.5 and Section 7052 and California Public Resources Code Section 5097.</p> <p>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 county coroner and a qualified professional archaeologist. The 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</p>					

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	<p>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 (NAHC) 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 would consult with a Most Likely Descendent 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.</p>					
<i>GEOLOGIC HAZARDS</i>						
Geotechnical Hazards	<p><i>Mitigation Measure GEO-1.</i> The project's site clearing, site preparation, subgrade preparation and stabilization, fill, drainage, and any foundation systems shall be designed and constructed per the specifications set forth on the project geotechnical report.</p>	SMUHSD Project Manager	SMUHSD/ Project geotechnical 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
<i>HAZARDS AND HAZARDOUS MATERIALS</i>	Mitigation Measure HAZ-1. All of the asbestos-containing materials identified in the NorBay survey (floor tiles, mastic, and insulation) shall be remediated by a licensed asbestos remediation contractor prior to demolition activities taking place that would disturb them. The contractor chosen must be familiar with and abide by the strict rules and regulations regarding the removal, packaging and disposal of asbestos-containing materials.	SMUHSD Hazmat Contractor	SMUHSD/ Project Manager	Prior to submittal of final design plans to Division of the State Architect		
<i>HYDROLOGY AND WATER QUALITY</i>						
Impacts on Water Quality.	<p>Mitigation Measure HYD-1: 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>Mitigation Measure HYD-2: 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</p>	SMUHSD Project Manager	SMUHSD Project Manager/ 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

	the BMPs. The owner shall conduct inspection and maintenance activities and complete annual reports.					
<i>NOISE</i>						
	<p>Mitigation Measure Noise-1: The Project shall develop a set of site-specific noise reduction measures. Noise reduction measures may include, but are not limited to, the following: All construction equipment shall be properly maintained and in good order. Major noise-generating construction equipment activity (> 75 dB at 50 feet) shall be limited to the hours of 8:00 a.m. and 7:00 p.m. on weekdays and on Saturdays between the hours of 9:00 a.m. and 6:00 p.m. Construction shall not be permitted on Sundays or on holidays.</p> <p>Prior to construction activities, the Project shall designate a “Construction Noise Coordinator” who would be responsible for responding to any local complaints about construction noise and vibration. The Construction Noise Coordinator shall determine the cause of the complaint and shall require implementation of reasonable measures to correct the problem. The telephone number for the Construction Noise Coordinator shall be conspicuously posted at the construction site.</p>	SMUHSD Project Manager	SMUHSD Project Manager/ Project Civil Engineer	<p>Noise reduction measures, designation of noise coordinator: Prior to submittal of final design plans to Division of the State Architect</p> <p>Notification of residents: At least three weeks prior to the start of construction activities</p>		

Identified Impact	Related Mitigation Measure	MONITORING			VERIFICATION	
		Implementation Entity	Monitoring and Verification Entity	Timing Requirements	Signature	Date
	At least three weeks prior to the start of construction activities, the Project shall provide written notification to all nearby residential units within 500 feet of the construction site informing them of the estimated start date and duration of construction activities, the role of the Construction Noise Coordinator, and how to contact the Construction Noise Coordinator.					