Initial Study/Preliminary Mitigated Negative Declaration

Carlmont High School Facilities Master Plan

1400 Alameda de las Pulgas, Belmont, California

February 13, 2026

Prepared for

Sequoia Union High School District

1090 Mills Way, Redwood City, California 94063

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California Environmental Quality Act (CEQA)

1.0 Project Information

Project Title:	Carlmont High School Facilities Master Plan
Lead Agency Name and Address:	Sequoia Union High School District 1090 Mills Way Redwood City, California 94063
Contact Person and Phone Number:	Narayan Naidu – Chief Facilities Officer Email: nnaidu@seq.org
Project Location:	Carlmont High School 1400 Alameda de las Pulgas, Belmont CA 94002
General Plan Designation:	Public/Community Facilities

Project Overview

The Carlmont High School Facilities Master Plan (FMP) proposes a comprehensive modernization of the campus to replace outdated facilities, enhance learning environments, upgrade athletic fields, and extend the campus's operational lifespan—without expanding student enrollment capacity. The plan includes three new buildings: a larger, modern classroom building with improved outdoor spaces and temporary portable classrooms during construction; a new building for student support services featuring an accessible rooftop terrace; and a new administration and student support Building to strengthen campus security and entry. Renovations would modernize the baseball field with synthetic turf and multipurpose athletic striping, upgrade the Main and Practice Gymnasiums, and refresh the library with flexible furnishings and updated technology infrastructure. Additional campus-wide improvements include light-emitting diode (LED) lighting, solar panels, roof resurfacing, energy-efficient windows, restroom upgrades, new paint, and exterior enhancements, as well as Americans with Disabilities Act (ADA)-accessible improvements to the stadium entrance and tennis court facilities.

Project Location

The Carlmont High School campus is located at 1400 Alameda de las Pulgas, Belmont, California 94002 (project site). Encompassing approximately 42 acres, the southeastern portion of the Carlmont High School is located within the limits of the City of San Carlos (**Figure 1**). Located southwest of Alameda de las Pulgas, the project site is approximately 1.5 miles southwest of Highway 101, 1,4 miles northeast of Interstate 280 (I-280), and 1 mile southwest of El Camino Real (**Figure 1**). It is bounded by Valerga Drive on the northwest, Alameda de Las Pulgas on the northeast, Cranfield Avenue on the southeast, and undeveloped land to the south and southwest separates the school from Hasting Drive.

Surrounding Land Uses

Multi-family buildings are located to the northwest and single-home residences are located to the north and northeast. Tierra Linda Middle School and Crossing Community Church are located to the northeast across Alameda de Las Pulgas. Wonder Years Preschool is located to the east, along Cranfield Avenue. The surrounding area to the west and south includes multiple apartment complexes, additional single-family homes, and open space.

Approvals

- Division of the State Architect (DSA) for buildings, handicap accessibility, fire, and life safety;
- Regional Water Quality Control Board for Stormwater Pollution Prevention Plans required during construction;
- City of Belmont and City of San Carlos for wastewater and water connections, and fire hydrants/water pressure.

2.0 Introduction

This Initial Study (IS) of environmental impacts has been prepared to conform to the requirements of the California Environmental Quality Act Public Resources Code Division 13, Environmental Quality (CEQA Statute); the California Code of Regulations section 15000 et seq. (CEQA Guidelines). The report is intended to inform the Sequoia Union High School District (SUHSD, or "District") Board of Trustees, responsible agencies, and the general public of the Carlmont High School Facilities Master Plan (FMP) project (proposed project) and its environmental consequences.

The SUHSD is the Lead Agency under CEQA and has prepared this Initial Study to address the impacts of implementing the proposed project. Based on the findings of this Initial Study, the SUHSD has made the determination that a Mitigated Negative Declaration (MND) is the appropriate environmental document to be prepared in compliance with CEQA (California Public Resource Code, Section 21000 et seq.).

This draft IS/MND has been prepared by the lead agency in conformance with Section 15070(a) of the CEQA Guidelines (14 CCR 15000 et seq.) to determine any potentially significant impacts associated with the proposed project and to identify mitigation that would reduce or eliminate the significant or potentially significant effects of the project.

In reviewing the IS/MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the project's possible impacts on the environment. The Draft IS/MND and related documents are available for review on SUHSD website: https://www.seq.org/DEPARTMENTS/Administrative-Services/Construction/CA-Environmental-Quality-Act-Documents/index.html. Comments on the IS/MND may be made in writing before the end of the public review period. Following the close of the public comment period, SUHSD will consider this IS/MND and comments thereto in determining whether to approve the proposed project. Written comments on the IS/MND should be sent to the following address by April 14, 2026 at 5:00 p.m.

Sequoia Union High School District
480 James Ave.
Redwood City, CA 94062
Attn: Facilities Department
Email: Construction@seq.org

Sources: Google,2025; Cal State Geoportal, 2026

FIGURE 1
Project Site Location
Carlmont High School Facilities Master Plan

3.0 Project Description

3.1 Existing Conditions

Carlmont High School, established in 1952, is a public-school within the Sequoia Union High School District, offering a four-year secondary program. The campus includes 102 classrooms distributed within Wings A through E, as well as Wings S, T, and U (**Figure 2**). Laboratories are located within Wings B, C, S and U. Additional facilities at Carlmont High School include a Performing Arts Center, music building, locker rooms, and a multi-use room that serves food services. The campus facilities range in height from one to three floors. The campus also features a variety of athletic amenities, including softball and baseball fields, tennis courts, a track, multiple gymnasiums, weight rooms, and an aquatic center. **Table 1, Carlmont High School Campus Existing Facilities**, provides a detailed list of the campus buildings, their corresponding square footage, and year of construction. The location of these buildings is depicted on the campus map in Figure 2. As indicated in **Table 1**, the total facilities square footage that includes classrooms, administration, library, food services, as well as arts, and sports space is 199,040 square feet.

The north portion of the campus encompasses a mix of academic buildings, administrative offices, a performing art center, and various athletic facilities including a softball field, a football/tracker/track field, tennis courts, gymnasiums, and an aquatic center. A baseball field is in the southeast corner of the campus.

TABLE 1 – CARLMONT HIGH SCHOOL CAMPUS

Building Name	Use	Size (Square Feet)	Year of Construction
Administration	Administration	14,479	1951 - 1954
A-Wing Central	Classrooms	5,483	1951 - 1954
A-Wing South	Classrooms	5,037	1951 - 1954
B-Wing	Classrooms	6,570	1951 - 1954
C-Wing North	Classrooms	4,538	1951 - 1954
C-Wing South	Classrooms	5,715	1951 - 1954
D-Wing North	Classrooms	4,538	1951 - 1954 Remodeled in 2003
D-Wing Central	Classrooms	3,604	1951 - 1954 Remodeled in 2003
D-Wing South	Classrooms	10,197	1951 - 1954 Remodeled in 2003
E-Wing North	Classrooms	4,687	1951 - 1954 Remodeled in 2003
E-Wing Central	Classrooms	3,828	1951 - 1954 Remodeled in 2003
E-Wing South	Classrooms	8,853	1951 - 1954 Remodeled in 2003
Performing Arts Center	Performing Arts	18,134	2007
Music Building	Classrooms	12,444	2007 Remodeled 2009

Building Name	Use	Size (Square Feet)	Year of Construction
Library	Library	5,783	1951 – 1954 Reroofed in 1985 Remodeled in 1976, 2006
Main Gymnasium	Classroom/Sports	16,462	1953 Reroofed in 1985
Girl's Locker Room	Classroom/Sports	2,392	Remodeled in 2016
Locker Rooms	Classroom/Sports	8,294	Remodeled in 2016
Weight Room	Classroom/Sports	4,737	2017
Practice Gymnasium	Classroom/Sports	8,218	1990s
Pool Building	Sports	1,124	2012
Multi-Use Room	Food Service	10,367	1951 - 1954
S Wing	Classrooms	8,375	2016
T Wing	Classrooms	15,166	1959 Reroofed in 1985
U Wing	Classrooms	10,015	1959 Reroofed in 1985
TOTAL		**199,040**	

SOURCE: KITCHELL, 2025.

3.1.1 Access and Circulation

The campus is located along the south side of Alameda de las Pulgas between the intersections with El Verano Way from the northwest and San Carlos Avenue in the southeast. Access to the campus as well as student drop off and pick up is from both intersections.

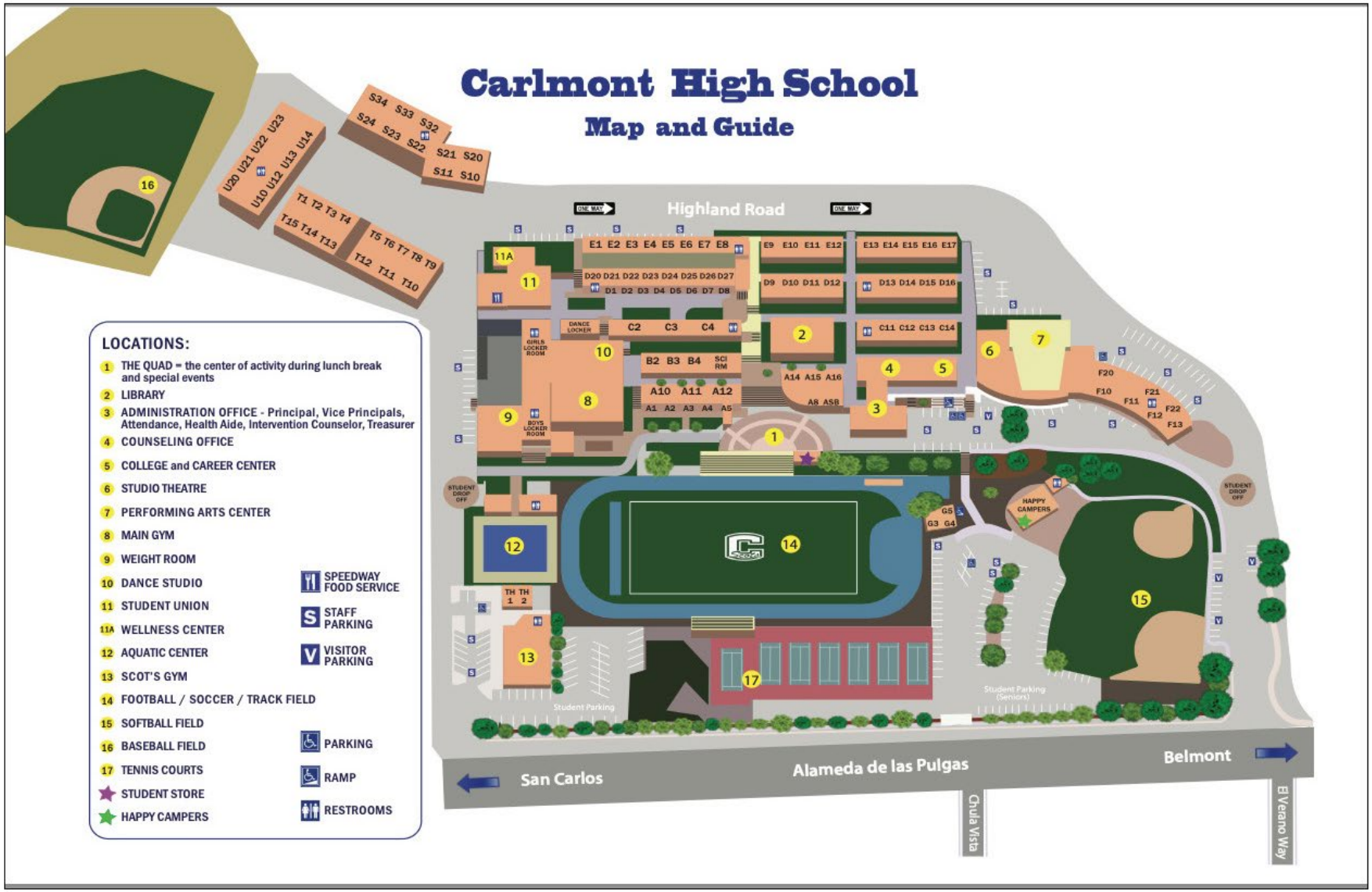
Pedestrians and Bicycle Access. The campus has multiple entry points for pedestrians and bicycles along Alameda de las Pulgas. Internal walkways connect classroom buildings, administrative offices, and athletic facilities.

Campus Vehicular Parking. Parking areas are distributed throughout the campus and are mostly along the school's northeastern boundaries. Approximately 443 parking spaces are available on campus for students, staff, and visitors that include 10 ADA parking spaces and 12 parking spaces for vans.

Bicycle Parking Facilities. The campus provides approximately one bike cage and three bike racks distributed across several secure locations.

3.1.2 Campus Landscape

Mature trees surround most of the site boundaries and parking lots within the project site. the campus includes landscaped grassy lawns with picnic tables, and landscaped planter areas adjacent to concrete paths, along the sides of buildings, or within concrete courtyards between buildings.



Source: SUHSD, 2025

FIGURE 2
Site Plan
Carlmont High School Facilities Master Plan

3.1.3 Campus Operations

Table 2, Student Enrollment, presents the number of student enrollment for the school years between 2019-2020 and 2024-2025. As of 2024, 2,360 students were enrolled, with a student-to-teacher ratio of approximately 20 to 1. Carlmont High School has a total staff of 210, including 119 teachers. Students of Carlmont High School follow a seven 50-minute period schedule Monday, Tuesday, Thursday, and Friday, starting at 8:30 am and finishing at 3:45 pm. Classes start at 10:02 a.m. on Wednesdays. On specified days, the minimum day schedule is applied, in which each of the seven periods lasts 30 minutes, start at 8:30 am and end at 12:50 pm.

TABLE 2 - STUDENT ENROLLMENT

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Carlmont High School	2,309[1]	2,302[1]	2,322[1]	2,360[1]	2,360[2]
Sequoia Union High School District	9,055	8,743	8,599	8,553	8,516

SOURCES: [1] Education Data Partnership. 2025. School Summary: Carlmont High School. https://www.ed-data.org/school/San-Mateo/Sequoia-Union-High/Carlmont-High/. Accessed June 11, 2025.
[2] Carlmont High School. School Profile 2024-2025. 2025.
[3] Sequoia Union High School District. Appreciation and Milestone. Annual Progress Report from the Sequoia Union High School District. 2025.

3.2 Project Characteristics

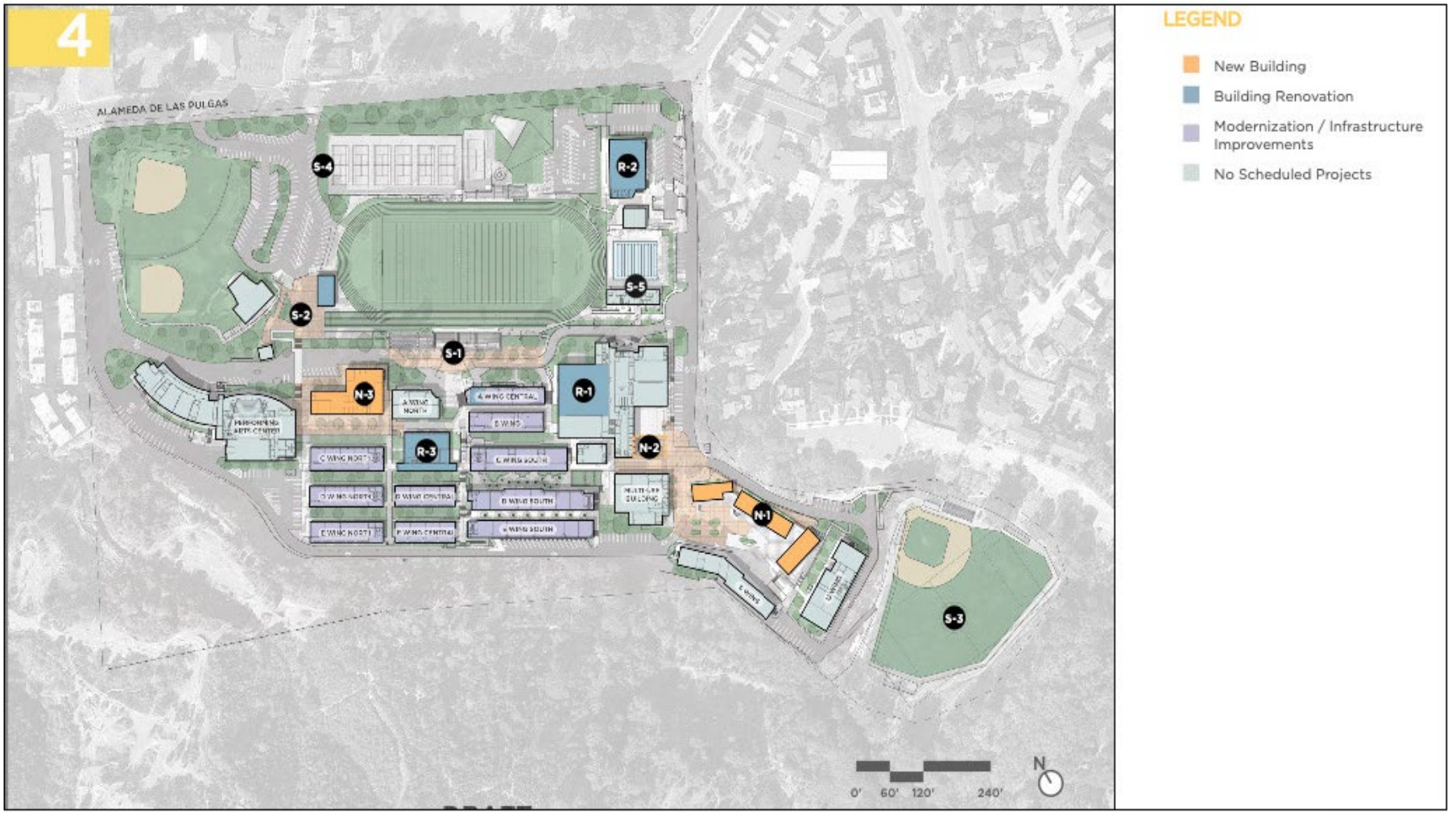
The proposed Carlmont High School Facilities Master Plan (FMP) project (proposed project) would replace old classrooms, modernize existing facilities, improve sports fields, and extending the functional lifespan of the campus infrastructure. The proposed project is not intended to expand the campus's enrollment capacity.

3.2.1 Proposed New Facilities

The proposed new facilities would include a new T-Wing building (**Facility N-1 in Figure 3**), a terrace building (**Facility N-2 in Figure 3**), and a new administration and student support building (**Facility N-3 in Figure 3**).

Redevelopment of the T-Wing Building

The approximately 15,000-square-foot existing T-Wing classroom building includes 15 undersized classrooms within its two stories. The project proposes the demolition of the T-Wing building for it to be replaced by an approximately 23,000 square feet, three-story classroom building with 19 classrooms, restrooms and outdoor seating areas (**Facility N-1 in Figure 3**). The proposed improvements would encompass approximately 3,200 square feet and would enhance the existing quad connecting the new T-Wing building with the S and U-Wing buildings. In addition, a new quad would be developed between the new T-Wing and the multi-use buildings to the north that would include outdoor seating and landscaping. The proposed improvements would reconfigure the access road to the building that is serving as a fire lane.



Source: CAW Architects, 2023

FIGURE 3
Proposed Facilities Master Plan
Carlmont High School Facilities Master Plan

As part of the proposed project, a temporary swing space would be installed to accommodate classroom functions during the construction of the new T-Wing building. The temporary portable classrooms would consist of modular structures placed within the parking lot located east of the practice gymnasium building. This temporary facility would ensure the continuity of academic operations and minimize disruption to students and staff during the construction period. The temporary swing space would be removed after the construction of the new T-Wing building is completed.

Terrace Building

The proposed project would involve the demolition of the existing concrete bleachers located along the eastern edge of the open court adjacent to the main gymnasium building to construct a new, approximately 3,000-square-foot, one-story structure dedicated to student support and guidance services (Facility N-2 in Figure 3). The roof of the proposed building would be designed as an accessible terrace from the existing ground level near the multi-use building and would include a shade trellis, stair access, and an elevator.

The proposed project would also modify the existing basement level and the covered outdoor seating area of the multi-use building to improve pedestrian circulation and site connectivity. The overall improvements would encompass approximately 6,000 square feet. The proposed improvements near the new terrace building would establish direct connections to the adjacent parking lot, existing pedestrian pathways serving the multi-use building, and the proposed new campus quad situated between the T-Wing and the multi-use buildings**.**

New Administration and Student Support Building

The other proposed new facility in the FMP is a new administration and student support building that would replace the existing administration building. The proposed improvement would include the demolition of the existing administration building and the construction of a new two-story administration and student support building, at the same location, that would enhance the clear and secure campus entrance. The new administration and student support building currently lacks sufficient detail for project-level analysis. This proposed development is analyzed at a programmatic level in this Initial Study. As more specific information becomes available, subsequent environmental review may be required to address project-specific impacts, pursuant to CEQA Guidelines sections 15168 and 15162.

3.2.2 Proposed Renovations

The proposed renovations would include the baseball field, main gymnasium, practice gymnasium, expanded bleachers with a press box, improved stadium entrance, and viewing stands at the tennis courts. Other miscellaneous improvements would include photovoltaic panels, single-glazed window replacement, restrooms renovation, roof resurfacing, exterior paint, and LED.

This Initial Study addresses at the project level the proposed renovations of the baseball field (multi-use sports field), interior renovations to existing facilities, and the other miscellaneous improvements, such as photovoltaic panels, single-glazed window replacement, restrooms renovation, roof resurfacing, exterior paint, and LED.

Other proposed renovations, such as the expanded bleachers with a press box, improved stadium entrance, and viewing stands at the tennis courts currently lack sufficient detail for project-level analysis. These proposed improvements are analyzed at a programmatic level in this Initial Study. As more specific information becomes available, subsequent environmental review may be required to address project-specific impacts, pursuant to CEQA Guidelines sections 15168 and 15162.

Multi-Use Sports Field

The proposed project would enhance the existing baseball field, transforming it into a versatile, multi-use field. The proposed improvements would include the removal of the existing natural grass surface on the baseball field and installation of a new synthetic turf system. This would include the following construction activities.

- Site Preparation and Demolition
  - Temporary fencing and signage to secure the construction area and ensure public safety.
  - Removal of existing natural grass, infield clay, and topsoil.
  - Removal of existing irrigation systems, drainage structures, or subsurface materials.
  - Demolition of the existing baseball field bleachers, backstops, fence, batting cages, and bullpens.
- Grading and Excavation
  - Minor grading to ensure proper drainage characteristics.
  - Installation of a retaining wall along the hillside on the south side to accommodate the multi-use field dimensions.
  - Subgrade compaction to meet the design specifications for stability and stormwater management.
- Drainage System Installation
  - Installation of a new subsurface drainage system to manage stormwater runoff. This may include a network of perforated drainpipes, drainage basins, and gravel layers designed to direct water away from the field.
  - Installation of infiltration trenches or connections to existing storm drain infrastructure.
- Synthetic Turf Installation and Striping
  - Installation and compaction of a multi-layer aggregate base over the prepared subgrade.
  - Installation of a shock-absorbing pad and the synthetic turf.
  - Installation of infill material (e.g., rubber granules, sand, or organic infill) across the turf surface to provide ballast and cushioning.
  - Installation of a temporary outfield fence for multiple sports activities, meeting the minimum National Federation of State High School Associations standards.
  - Reorientation of the multi-use field to face northeast in alignment with athletic facilities best practices and field layouts standards.
  - Turf field striping to accommodate multiple athletic uses:

    - Soccer: 110 yards by 70 yards
    - Lacrosse: 120 yards by 70 yards
    - Football: 120 yards by 53.33 yards
- Ancillary Improvements
    - Ancillary improvements would include installation of a natural clay batter's circle and pitching mound and construction of new batting cages**,** bullpens**,** and dugouts

Main Gymnasium

The main gymnasium would be upgraded from the interior. Proposed renovations would include installation of new retractable bleachers, refinishing of the existing wood flooring, restoration and opening of skylights to enhance natural lighting, application of new interior paint, and installation of new wall padding for safety and aesthetic enhancement.

Practice Gymnasium

The proposed upgrades would be to interior of the practice gymnasium and would include the installation of a new sports-sprung wood floor and a ceiling-mounted hoist system for the wrestling mat.

Library

The library interior would be renovated to include updated finishes, replacement of outdated computer workstations with modern, flexible furniture, and upgrades to power and data infrastructure to support current and future technology needs.

Stadium Entrance

The stadium entrance would be improved through regrading to create an accessible pathway and entry plaza from the adjacent parking lot. In addition, a new stadium field house would be constructed, featuring two team rooms, restrooms, and a snack bar.

Tennis Courts Viewing Stands

The proposed improvements at the tennis courts would include the installation of new bleachers, along with associated accessibility improvements to ensure ADA compliance.

3.2.3 Other Miscellaneous Improvements

Additional miscellaneous improvements would include the following:

- Installation of exterior LED lighting at the aquatic building and throughout the campus
- Installation of solar panels
- Replacement of existing single-glazed windows with energy-efficient alternatives
- Renovation of existing restrooms
- Resurfacing of building roofs
- Application of new exterior paint

3.2.4 FMP Project Construction

Schedule

Construction of the new T-Wing building is anticipated to begin in summer 2027 and be completed by the end of spring 2029. Following its completion, construction of the terrace building is expected to commence in late spring 2029 and conclude by mid-winter 2031.

Renovation of the existing baseball field is scheduled to occur between summer 2026 and mid-winter 2027. Miscellaneous site improvements, such as roof resurfacing, replacement of single-glazed windows, and exterior painting, would take place intermittently between summer 2026 and summer 2030.

Construction Activities

Construction activities of new buildings would involve site preparation that would include demolition, grading, and staging of construction equipment and trailers, among other site preparation activities in the zoned areas planned for construction. Additionally, construction of new buildings would include the installation of new utilities, including water, sewer, and electrical services. In addition, construction of new buildings would include restoration activities, landscape and pathways, stormwater management control, and the installation of lighting. Construction material staging would be fully contained onsite within the designated boundary limits of each new construction site.

Proposed renovations would be mostly to the interior of existing buildings. Renovation materials and equipment would be stored on campus in fenced locations in proximity of the proposed renovation activities.

Project construction would require excavation of approximately 9,700 cubic yards of soil material or asphalt materials. The project would include placement of approximately 9,700 cubic yards of imported soil.

Construction Access

Access for construction of the T-Wing building and the terrace building, as well as the renovation of the existing baseball field would be through the campus entrance at the intersection of Alameda de las Pulgas and San Carlos Avenue, as shown in **Figure 4 – Construction Access**. No road or lane closures are anticipated during project construction.

Workforce and Truck Trips

The construction workforce during construction is anticipated to average 50 daily workers for the largest FMP project (new T-Wing building), with a maximum of 75 workers on a given day. The number of daily truck trips would range between 1 and 50, with peak activity occurring during the construction of new buildings.

Construction Materials and Equipment

Construction activities would require the use of typical construction equipment. This would include drill rigs, cranes, excavators, loaders, graders, compactors, concrete pumps, concrete

trucks, dump trucks, delivery trucks, forklifts, scissor lifts, bobcats, as well as medium and light duty trucks.

Power and water use during construction would be provided from existing utilities onsite.

In addition to complying with the District's Standard Construction Measure for air quality (SCM-1) (**Section 3.2.5 – District Standard Construction Measures**), the proposed project will use construction equipment with low diesel particulate matter (DPM) emissions. All diesel-powered equipment over 50 horsepower operated on-site for more than two consecutive days or 20 total hours will meet U.S. EPA Tier 4 Interim standards.

Alternatively, the contractor may submit a plan demonstrating reduced DPM emissions, which could include measures such as using electric or propane-powered equipment, installing electric power lines early, adjusting construction sequencing, or employing building techniques that minimize diesel use.

Sustainable features

The project would incorporate sustainable design strategies to enhance the campus's environmental performance and resilience. Key measures include the expansion of on-site solar energy systems and targeted improvements to building energy efficiency.

3.2.5 District Standard Construction Measures

The District has adopted standard construction measures that must be implemented during construction of District projects and incorporated into all District construction contracts so that environmentally responsible practices are applied consistently across projects. These standard construction measures, along with any mitigation measures adopted through the CEQA review process, are required to be implemented pursuant to the construction contract specifications for all District projects. The applicability of these standard construction measures to the proposed project is evaluated under each relevant resource topic in this Initial Study.

SCM-1: AIR QUALITY. All construction projects undertaken by the Sequoia Union High School District will comply with applicable local and State dust control regulations, as well as local health risk thresholds. All projects, regardless of location, will meet the Bay Area Air District thresholds for construction-related air pollutants.

- To ensure compliance with air quality standards, projects will implement project-specific air quality control measures as needed. These may include, but are not limited to:
- Using high-tier engines on construction equipment.
- Comply with the standard Title 13 CCR sections 2449, 2449.1, and 2449.2, which requires providing Certificate(s) of Reported Compliance for In-Use Off-Road Diesel-Fueled Fleets.
- Employing Verified Diesel Emission Control Strategies (VDECS), such as diesel particulate filters, and low emissions fuel.

SCM-2: BIOLOGICAL RESOURCES. Prior to the start of construction, all project sites and the immediately surrounding areas shall be screened to determine whether biological resources could be affected by project activities. A qualified biologist shall conduct a biological survey, as

appropriate, to document existing site conditions and identify the presence or potential habitat for special-status species, migratory birds, and other sensitive biological resources.

If the screening or survey indicates that biological resources may be impacted, the District shall comply with all applicable local, State, and federal regulations governing biological resource protection, including but not limited to the Migratory Bird Treaty Act and the federal and State Endangered Species Acts.

As necessary, appropriate avoidance and minimization measures shall be implemented to protect biological resources. Such measures may include, but are not limited to:

- Installation of wildlife exclusion fencing;
- Establishment of environmentally sensitive area buffer zones;
- Installation of bird deterrent devices;
- Monitoring by a qualified biologist during construction; and
- Other measures as determined appropriate by the District or regulatory agencies.

Trees Protection. The District defines heritage trees as native trees with a diameter at breast height (DBH) greater than 15.2 inches. Native species, including Coast Live Oak, Valley Oak, Redwood, Madrone, Bay Laurel, and Buckeye, are classified as protected trees if they have either a single main stem of 10 inches or greater DBH, or up to three largest secondary stems that together total 10 inches or more DBH.

When construction activities are planned near trees, a survey of all trees in proximity to the construction area is required, along with the preparation of a Tree Protection and Preservation Plan. This plan must outline protective measures to be implemented during construction. If construction will result in the removal of trees, the plan must include a tree replacement strategy, maintaining a one-to-one replacement ratio for protected trees and at least a one-to-one ratio for heritage trees.

SCM-3: CULTURAL RESOURCES. Projects involving ground disturbance shall implement, as applicable, the following District's Standard Archaeological Measures.

I. **Alert Sheet:** Prior to any soils disturbing activities, the District shall distribute the "CULTURAL RESOURCES ALERT Sheet" to each project contractor or vendor involved in project-related soils disturbing activities; ensure that each contractor circulates it to all field personnel; and provide the District with a signed affidavit from each contractor confirming distribution to all field personnel.

II. **Archaeological Resources Screening:** Projects involving ground disturbance will initially be screened to identify whether there is demonstrable evidence of prior ground disturbance in the project site to the maximum vertical and horizontal extent of the current project's planned disturbance.

    For projects where prior complete ground disturbance has occurred throughout areas of planned work, the District will provide evidence of the previous disturbance in the Categorical Exemption and no further archaeological screening will be required.

    For projects that are on previously undisturbed sites or where the depth/extent of prior ground disturbance cannot be documented, or where the planned project-related ground

disturbance will extend beyond the depth/extent of prior ground disturbance, additional screening will be carried out by a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61] and approved by the District. The qualified archaeologist will conduct an archival review for the project site, including a records search of the California Historical Resources Information System (CHRIS) and other archival sources as appropriate. The qualified archaeologist will also conduct an archaeological field survey of the project site if, in the archaeologist's judgment, this is warranted by site conditions. Based on the results, the archaeologist will complete and submit to the District and Archaeological Resources Evaluation that will include recommendations for the need for archaeological testing, additional research and/or treatment measures to be implemented by the project to protect and/or treat significant archaeological resources identified as being present within the site and potentially affected by the project. The District's archaeologist shall implement the recommendations prior to and/or during project construction consistent, as needed. Ground disturbing activities in archaeologically sensitive areas, as identified through the above screening, will not begin until required preconstruction archaeological measures of the Archaeological Resources Evaluation have been implemented.

III. **Discovery of Archaeological Resources**. The following measures shall be implemented in the event of a discovery during soil disturbance:

- **Work Suspension**. Should a potential archaeological resource be encountered during project soils disturbing activity, with or without an archaeological monitor present, the project Head Foreman shall immediately suspend soils disturbing activities within 50 feet of the discovery, protect the find from further disturbance, and immediately notify the District Project Manager.
- **Assessment:** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (36-CFR 61), in consultation with the District, shall document the find, evaluate based on available information whether it qualifies as a significant historical resource under the CEQA criteria, and provide recommendations for additional treatment as warranted. The District will consult with the qualified archaeologist on these recommendations and may require implementation of additional measures, such as preparation and implementation of an Archaeological Monitoring Plan, a Subsurface Testing Plan, and/or an Archaeological Data Recovery Plan, and including associated research designs, descendant group consultation, other reporting, curation, and public interpretation of results.
- An **Archaeological Monitoring Plan (AMP)** shall be prepared and implemented within areas determined during preliminary investigation to be highly sensitive or upon a discovery during construction. The AMP shall include the following elements:
    - Historical context and research design for assessment of resource types likely to be encountered;
    - Project activities to be archaeologically monitored and schedule of monitoring of each type and location of project construction activity; and
    - Procedures for the documentation, significance and integrity assessment, interpretation and reporting of the types of resources likely to be encountered.

- **Monitoring Process**. The archaeological monitor will have the authority to halt construction activity at the location of a suspected resource for inspection, documentation, and assessment of the need for further measures, such as archaeological resources testing and recovery. The Archaeological Monitor shall record and collect soil samples, as warranted, for analysis. At the end of construction, whether or not significant archaeological resources are encountered, the archaeological consultant shall prepare a report of the findings of the monitoring.
- **Subsurface Testing Plans and Data Recovery.** In the event of a discovery during construction, if the District and archaeological consultant determine that the discovery is a significant resource that will be adversely affected an archaeological field investigation will be conducted to determine whether the discovered resource retains depositional integrity and whether it qualifies as a legally significant resource under CEQA criteria.
    - Subsurface Testing Plan. If an archaeological investigation is required in order to verify resource location and/ or assess the significance of the resource, the archaeological consultant shall prepare and implement an Subsurface Testing Plan (STP) that identifies:
        - Key research goals and associated data requirements,
        - Survey and testing/ sampling methods,
        - Laboratory and analytical methods, and
        - Reporting structure
    - Treatment**.** If, based on the STP results, the District finds that significant archaeological resources may be present, preservation in place is the preferred manner of mitigating impacts, as detailed in CEQA Guidelines 15126.6(b) (3)(a) and (b). If preservation in place is determined to be infeasible, the District at its discretion shall either:
        - Re-design the proposed project so as to reduce the adverse effect to a less-than-significant level through preservation in place or other feasible measures; and/or
        - Document and/or recover the resource for interpretive use, at the discretion of the District, and/or;
        - For archaeological resources that would require recovery, the District shall prepare an archaeological data recovery program, that will identify how the archaeological resource will be recovered and preserved.
- **Archaeological Resources Reports**. For projects in which a significant archaeological resource is encountered and treated during project implementation the archaeological consultant shall submit an Archaeological Resources Report to the District that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing, monitoring, and data recovery program. Once approved by the District, copies of the Archaeological Resources Report shall be submitted to the California Historic Resources Information System (CHRIS), one copy to each

descendant group involved in the project (if applicable), and documentation to the District of transmittal of the above copies.

- **Human Remains, Associated or Unassociated Funerary Objects.** The District shall ensure that human remains and associated or unassociated funerary objects discovered during any soils disturbing activity are treated in compliance with applicable State and federal laws. In the event of the discovery of potential human remains, the construction contractor shall ensure that construction activity within 50 feet of the find is halted and the District PM and the County Coroner are notified immediately. If the Coroner determines that the remains are of Native American origin, he/she will notify the California State Native American Heritage Commission. Subsequent consultation on and treatment of the remains will be conducted consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(d), in consultation with the District.
- **Consultation with Descendant Communities**. Consistent with AB 52 requirements, if requested, the District shall provide opportunities for Native American descendant groups to provide input during project planning for projects that may affect potential Tribal Cultural Resources. In addition, on discovery during construction of an archaeological site associated with descendant Native Americans, the District shall contact an appropriate representative of the descendant group. The District will consult with the representative regarding the appropriate treatment, management, and, if applicable, interpretation of the site and any recovered materials, and as needed, will provide the opportunity to monitor archaeological field investigations at the site.

SCM-4: GEOLOGY AND SOILS. Projects that include new constructions or structural modifications to existing buildings shall prepare a characterization of soil types and evaluate the potential for liquefaction, subsidence, landslide, fault displacement, and other geological hazards at the project site. Such projects will be engineered and designed as necessary to minimize risks to safety and reliability arising from these hazards. Where appropriate, geotechnical investigations will be conducted, and measures such as filters, customized construction schedules and procedures, and the use of low-emissions fuel will be implemented.

SCM-5: HAZARDOUS MATERIALS. In the event that site soils or groundwater to be disturbed during construction are suspected or known to contain hazardous materials, including naturally occurring asbestos (NOA), the District shall perform an environmental assessment consistent with applicable regulatory standards (e.g., Phase I and Phase II assessments as warranted).

If the assessment identifies the presence of hazardous materials, the District shall prepare and implement a Hazardous Materials Management Plan or equivalent remediation plan to ensure that such materials are properly treated, contained, or removed in accordance with all applicable local, State, and federal regulations, including those enforced by the California Department of Toxic Substances Control, Regional Water Quality Control Board, San Mateo County Environmental Health Services Division, and Cal/OSHA. The plan shall include measures to prevent adverse exposure to workers, students, and the public during and after construction.

Should unidentified or unexpected hazardous materials (including stained soils, odors, or discolored groundwater) be encountered during construction, work in the immediate area shall be halted until a qualified environmental professional has evaluated the material, coordinated

with the appropriate agencies, and ensured proper handling, removal, and disposal consistent with applicable laws and safety protocols.

The District shall also implement best management practices to prevent releases of hazardous materials used during construction activities, including proper storage in accordance with manufacturer recommendations, maintenance of spill containment and cleanup kits onsite, immediate containment of any spills to the extent safe and feasible, and collection and disposal of waste in compliance with applicable regulations.

All spills or releases of reportable quantities shall be promptly reported to the appropriate agencies, including the San Mateo County Environmental Health Services Division, California Office of Emergency Services, Department of Toxic Substances, Regional Water Quality Control Board, and Bay Area Air District, as applicable.

SCM-6: HYDROLOGY AND WATER QUALITY. All projects will implement site-specific erosion and sedimentation controls—such as fiber rolls, gravel bags around stormwater inlets, silt fences, and other appropriate measures—to prevent the discharge of sediment and other pollutants to storm drains and surface waters, including San Francisco Bay, the Pacific Ocean, water supply reservoirs, wetlands, swales, and streams. Depending on project location and scope, a Stormwater Pollution Prevention Plan (SWPPP) will be prepared in compliance with the California State Water Resources Control Board General Construction Permit. Any uncontaminated groundwater encountered during excavation activities will be discharged in compliance with applicable water quality standards and permit requirements.

SCM-7: NOISE. All projects will comply with local noise ordinances regulating construction noise. The District shall undertake measures to minimize noise disruption to nearby neighbors and sensitive receptors during construction. These efforts could include using best available noise control technologies on equipment (i.e., mufflers, ducts, and acoustically attenuating shields), locating stationary noise sources (i.e., pumps and generators) away from sensitive receptors, erecting temporary noise barriers, and other such measures.

SCM-8: TRANSPORTATION. All projects will implement traffic control measures designed to maintain safe and efficient circulation for vehicles and pedestrians on public streets affected by construction. Such measures may include, but are not limited to, flaggers and construction warning signage, scheduling truck trips during non-peak hours where feasible, maintaining access to driveways, private roads, and off-street commercial loading areas using steel trench plates or similar methods, and coordinating with local emergency responders to ensure uninterrupted emergency access. Projects will also obtain all required encroachment permits from the relevant jurisdiction for work within public roadways.

3.2.6 Project Operations

The proposed project's improvements would adapt the campus to its existing enrollment capacity and modernize its facilities by making them more adaptable. The proposed FMP is focused on modernizing existing campus facilities and would not involve expanding the school's enrollment capacity. Accordingly, and upon completion of construction, campus operations would continue in a manner consistent with current conditions.

N 0 1,000 Feet

Sertior, 2025

Source: Google 2025

FIGURE 4

Construction Site Access

Carlmont High School Facilities Master Plan

4.0 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. Where checked below, the topic with a potentially significant impact will be addressed in an Environmental Impact Report (EIR).

☐	Aesthetics	☐	Agriculture and Forest Resources	☒	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☒	Geology / Soils	☐	Greenhouse Gas Emissions	☐	Hazards / Hazardous Materials
☐	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☐	Noise	☐	Population / Housing	☐	Public Services
☐	Utilities / Service Systems	☒	Tribal Cultural Resources	☐	Wildfire
☒	Mandatory Findings of Significance	☐		☐	

5.0 DETERMINATION

On the basis of this initial evaluation:

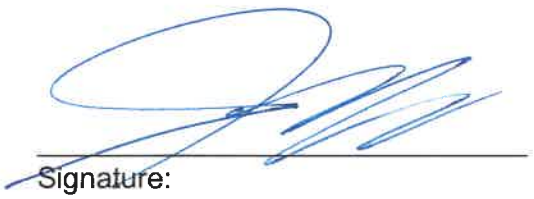
☐I find that the proposed project could not have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.

☒I find that although the proposed project COULD have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

☐I find that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

☐I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the effects that remain to be addressed.

☐I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier **EIR** or **NEGATIVE DECLARATION** pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier **EIR** or **NEGATIVE DECLARATION**, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature:

03/09/2026

Date:

6.0 EVALUATION OF ENVIRONMENTAL IMPACTS

6.1 Aesthetics

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) and c) *Have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or quality of public views of the site and its surroundings?*

The proposed project would have the potential to affect scenic vistas and/or scenic corridors if new or intensified development blocked views of areas that provide or contribute to such vistas. Potential effects could include blocking views of a scenic vista/corridor from specific publically accessible vantage points or the alteration of the overall scenic vista/corridor itself. Such alterations could be positive or negative, depending on the characteristics of individual future developments and the subjective perception of observers. Scenic vistas are generally interpreted as long range views, while scenic corridors are considered public views as seen along a linear transportation route and scenic vistas are views of a specific scenic feature.

The City of Belmont has 14 neighborhood, characterized by their views.[1] The Western Hills neighborhood of the City of Belmont is located west and southwest of the project site. Western Hills has the most hills, characterized by undeveloped open space, and includes apartment complexes, townhomes, and single-family homes.

The Carlmont neighborhood, located northwest of project site, is characterized by a concentrated amount of condominium and apartment complex developments with a well

[1] City of Belmont. 2017. Draft Program Environmental Impact Report for the Belmont General Plan Update, Phase 1/Interim Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30. https://www.belmont.gov/departments/community-development/2035-general-plan-update/draft-environmental-impact-report. Accessed October 10, 2025.

maintained landscape. The Chula Vista neighborhood is located to the east of the site. This neighborhood, characterized by single-family homes, borders the school near the existing T-Wing building and the multi-use field.

Ralston Avenue offers scenic vistas from numerous vantage points. However, the road is not designated a State Scenic Highway.[2] The road is located approximately at 0.3 miles north of the project site.

San Carlos's General Plan identifies several roads with scenic value at the local level, including Alameda de las Pulgas, San Carlos Avenue, Brittan Avenue, Club Drive, Crestview Drive (which offers views to the east), El Camino Real, and Holly Street.

Other than the local designation of Alameda de las Pulgas, there are no designated scenic corridors or vistas near the project site. The section of I-280 at the level of the City boundaries is considered a scenic highway per the California Scenic Highways Program.[3] I-280 is located approximately 1.1 miles southwest of the project site. The Western Hills neighborhood borders the project site on the west and southwest. Views of the site from I-280 are largely obstructed by existing topography.

The proposed FMP would include three new buildings: a larger, modern classroom building with improved outdoor spaces and temporary portable classrooms during construction; a new building for student support services featuring an accessible rooftop terrace; and a new administration and student support building to strengthen campus security and entry. Renovations will modernize the existing baseball field with synthetic turf and multi-purpose athletic striping, upgrade the main and practice gymnasiums, and refresh the library with flexible furnishings and updated technology infrastructure. Additional campus-wide improvements include LED lighting, solar panels, roof resurfacing, energy-efficient windows, restroom upgrades, new paint, and exterior enhancements, as well as ADA-accessible improvements to the stadium entrance and tennis court facilities. The proposed new buildings would be located in the same area of the campus where buildings currently exist. All proposed improvements would be located within the interior of the campus and set back from the site boundaries. Although the campus is visible from the Western Hills and Chula Vista neighborhoods, the proposed new buildings would be similar in height to the existing school building and therefore would not block the views or substantially alter the visual character from the surrounding areas. Views of the project site from the Carlmont neighborhood are obscured by trees and existing development. During construction, staging and construction activities would be fully onsite and would be partially visible from outside the school boundaries.

Therefore, the project would result in ***less-than-significant*** impact on the visual character and quality of views from the public areas surrounding the project site.

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[2] City of Belmont. 2017. Draft Program Environmental Impact Report for the Belmont General Plan Update, Phase 1/Interim Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30. https://www.belmont.gov/departments/community-development/2035-general-plan-update/draft-environmental-impact-report. Accessed October 10, 2025.

[3] California Department of Transportation. California State Scenic Highway System Map. https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed August 25, 2025.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As noted above, the closest officially designated state scenic highway to project site is I-280, located approximately 1,1 miles to the southwest. The project site is not visible from the officially designated state scenic highway. Therefore, the proposed project would not damage scenic resources within a state scenic highway. There would be ***no impact***.

c) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Light pollution in most of the project area is minimal, and is restricted primarily to street lighting along Alameda de Las Pulgas and Ralston Avenue, and to night- time illumination of commercial buildings. No new significant night lighting is proposed as part of the project, except for light fixtures at pedestrian pathways to enhance safety and visibility. Exterior light would be fluorescent lighting with energy-efficient LED fixtures. All new lighting will be fully shielded and directed toward the ground and not toward neighboring properties. This impact would be ***less than significant***.

6.2 Agriculture and Forest Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland.				
In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

6.2.1 Environmental Setting

The major portion of the project site is located in the City of Belmont and the southeastern portion is located within the limits of the City of San Carlos. The proposed project improvements would occur within an existing developed area. The project site is identified on the Farmland Mapping and Monitoring Program as Urban and Built-up Land,[4] defined as "Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports,

[4] California Important Farmland Finder. 2025. Web map showing the Important Farmland Maps compiled by the Farmland Mapping and Monitoring Program pursuant to Section 65570 of the California Government Code. https://www.arcgis.com/apps/mapviewer/index.html?webmap=e3ac97649cc94492884add4890f52f3a. Accessed October 10, 2025.

golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes."

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

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

c) *Result in the loss of forest land or conversion of forest land to non-forest use?*

d) *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?*

The proposed project would be located on a developed site identified on the Farmland Mapping and Monitoring Program as Urban and Built-up Land. Therefore, the proposed project would not impact Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, or land under a Williamson Act contract as none are present on the project site. The project would not convert or cause the conversion of any farmland or forest land to a non-agricultural/non-forest use. Therefore, the project would not result in impacts to any agricultural or forestry resources. ***No impact*** would occur.

6.3 Air Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations.				
Are significance criteria established by the applicable air district available to rely on for significance determinations?				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

6.3.1 Environmental Setting

Ambient Air Quality Standards

The Federal and California Clean Air Acts have established ambient air quality standards for “criteria” pollutants. Criteria pollutants are considered the most prevalent air pollutants that are known to be hazardous to human health. National ambient air quality standards (NAAQS) were established by the Federal Clean Air Act of 1970 (amended in 1977 and 1990) for six "criteria" pollutants. These criteria pollutants now include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), respirable particulate matter with a diameter less than 10 microns (PM_{10}), sulfur dioxide (SO_2), and lead (Pb). In 1997, The U.S. Environmental Protection Agency (EPA) added fine particulate matter ($PM_{2.5}$) as a criteria pollutant. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. California ambient air quality standards (CAAQS) include the NAAQS pollutants and also hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles. These additional CAAQS pollutants tend to have unique sources and are not typically included in environmental air quality assessments. In addition, lead concentrations have decreased dramatically since it was removed from motor vehicle fuels. The Bay Area has attained the CO standard and monitoring data from the last 30 years show relatively low concentrations throughout the Bay Area. Therefore, CO is not an air quality issue for land use type projects such as the proposed project.

Air Pollutants of Concern

There are two categories of pollutants analyzed for California Environmental Quality Act (CEQA) compliance; criteria pollutants and toxic air contaminants (TACs). Criteria pollutants are those

which have ambient air quality standards established by either the federal government (i.e., U.S. EPA) or the State. TACs are pollutants that are known to either increase cancer risk or have non-cancer health impacts in high concentrations.

Criteria Pollutants – Ozone and Particulate Matter

High ozone concentrations in the air basin are caused by the cumulative emissions of reactive organic gases (ROG) and nitrogen oxides (NO_X). These precursor pollutants react under certain meteorological conditions to form ozone. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to reduce ambient ozone concentrations. The highest ozone concentrations in the Bay Area occur in the eastern and southern inland valleys downwind of existing air pollutant sources. High ozone concentrations aggravate respiratory and cardiovascular diseases, reduce lung function, and increase coughing and chest discomfort.

Particulate matter is another problematic air pollutant in the air basin. Particulate matter is assessed and measured in terms of respirable particulate matter or particles that have a diameter of 10 micrometers or less (PM_{10}) and fine particulate matter where particles have a diameter of 2.5 micrometers or less ($PM_{2.5}$). Elevated concentrations of PM_{10} and $PM_{2.5}$ are the result of both region-wide emissions and localized emissions. High particulate matter concentrations aggravate respiratory and cardiovascular diseases, reduce lung function, increase mortality (e.g., lung cancer), and result in reduced lung function growth in children. Due to the adverse health effects caused by $PM_{2.5}$ exposure even at low concentrations, the Bay Area Air District (Air District)[5] has developed health risk thresholds to address exposure to increased $PM_{2.5}$ concentrations caused by projects.

Toxic Air Contaminants

TACs are a broad class of compounds known to cause morbidity or mortality, often because they cause cancer. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Because chronic exposure of TACs can result in adverse health effects, they are regulated at the regional, State, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about seventy percent of the cancer risk from TACs (based on the Bay Area average). According to the California Air Resources Board (CARB), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects from diesel exhaust exposure a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State's Proposition 65 or under the Federal Hazardous Air Pollutants programs. Health risks from TACs are estimated using the Office of Environmental Health Hazard Assessment (OEHHA) risk assessment guidelines, which were published in February of 2015 and incorporated into the Air District's CEQA guidance.

[5] Also known as the Bay Area Air Quality Management District (BAAQMD).

The Air District also considers $PM_{2.5}$ to be a TAC due to the adverse health effects caused by $PM_{2.5}$ exposure even at low concentrations. As a result, they have developed CEQA health risk thresholds to address exposure to increased concentrations of $PM_{2.5}$.

Sensitive Receptors

There are groups of people more affected by air pollution than others. CARB has identified the following persons who are most likely to be affected by air pollution: children under 16, people over 65, athletes, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. For cancer risk assessments, infants and children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children. The closest sensitive receptors to the project site are in the adjacent single-family homes surrounding the project site. There are also infants and children located at the Alpha Kids Academy located to the south of the project site.

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

The Air District is the regional agency responsible for overseeing compliance with State and Federal laws, regulations, and programs within the San Francisco Bay Area Air Basin (SFBAAB). The Air District, with assistance from the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC), prepares and implements specific plans to meet the applicable laws, regulations, and programs. The most recent and comprehensive of which is the *Bay Area 2017 Clean Air Plan*.[6] The primary goals of the Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce greenhouse gas (GHG) emissions and protect the climate. The Air District has also developed CEQA guidelines to assist lead agencies in evaluating the significance of air quality and GHG impacts. In formulating compliance strategies, The Air District relies on planned land uses established by local general plans. Land use planning affects vehicle travel, which, in turn, affects region-wide emissions of air pollutants and GHGs.

The 2017 Clean Air Plan, adopted by the Air District in April 2017, includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Guidance provided in the Air District CEQA guidelines recommends that local plans show consistency with the control measures listed within the Clean Air Plan. At the project-level, there are no consistency measures or thresholds provided in the Air District's CEQA guidance. The proposed project would include school improvements that would not introduce any substantial sources of air pollutants or sources permitted by the Air District. The proposed project would not conflict with the latest Clean Air planning efforts since the project would have emissions below the Air District thresholds. This impact would be ***less than significant***.

[6] Bay Area Air District (Air District), 2017. Final 2017 Clean Air Plan.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The Bay Area is considered a non-attainment area for ground-level O_3 and $PM_{2.5}$ under both the NAAQS and the CAAQS. The area is also considered non-attainment for PM_{10} under the CAAQS, but not the NAAQS. The area has attained both State and Federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O_3, $PM_{2.5}$ and PM_{10}, the Air District has established thresholds of significance for these air pollutants and their precursors. The O_3 precursor pollutant thresholds are for ROG and NOx, while PM_{10}, and $PM_{2.5}$ have specific thresholds. The thresholds apply to both construction period emissions and operational period emissions.

In addition to complying with the District's Standard construction Measures for air quality (SCM-1) (**Section 3.2.5, District Standard Construction Measures**), the proposed project has committed, where feasible, to using construction equipment that meets U.S. EPA Tier 4 Interim emission standards for particulate matter, or to using alternatively-fueled equipment, as described in **Section 3.2.4, FMP Project Construction**. This would apply to construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total.

Construction Period Emissions

The California Emissions Estimator Model (CalEEMod) Version 2022 was used to estimate emissions from on-site construction activity, construction vehicle trips, and evaporative emissions. The project land use types and size were input to CalEEMod. The CalEEMod construction inputs are included in **Appendix A**.

CalEEMod Inputs

Land Uses. The proposed project would be constructed in phases including construction of the baseball field, the T-Wing building, and the terrace building. Detailed design information for the replacement administration building, the expanded stadium bleachers with press box, and the stadium entrance and field house was not yet available. Accordingly, these facilities were evaluated using conservative assumptions based on estimated land use types, approximate building sizes, and an assumed construction year of 2030. These inputs were used to account for potential emissions at a programmatic level and do not represent project-specific construction emission analysis for these facilities. Separate CalEEMod runs were conducted for each phase. The land uses for each phase were entered into CalEEMod, as described in **Table 3 – Summary of Project Land Use Inputs**.

TABLE 3 - SUMMARY OF PROJECT LAND USE INPUTS

Project Land Uses[1]	Size	Units	Square Feet	Acreage
Baseball Field (2026)				
City Park	2.0	Acre	-	2.0
T-Wing Building (2027)				
High School	23	1,000 square feet	23,000	1
Other Non-Asphalt Surfaces	20	1,000 square feet	-	
Terrace Building (2029)				
High School	3	1,000 square feet	3,000	0.5
Administration Building Addition (2030)				
High School	22	1,000 square feet	22,000	1
Stadium Expanded Bleachers (2030)				
City Park	0.50	Acre	-	0.5
Other Asphalt Surfaces	7.5	1,000 square feet	-	
Stadium Entrance & Field House (2030)				
High School	3	1,000 square feet	3,000	0.5
Other Non-Asphalt Surfaces	10	1,000 square feet	-	

SOURCE: Illingworth and Rodkins, 2025.
NOTES: [1] "Project Land Uses" are the land use type defined by CalEEMod.
Emissions analysis of the Administration building, stadium expanded bleachers, and stadium entrance and field house were calculated to support the programmatic analysis. These calculations would be revised once more project details become available.

Construction Inputs. CalEEMod computes annual emissions for construction that are based on the project type, size, and acreage. The model provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activities includes worker, hauling, and vendor traffic. The construction build-out scenario, including equipment quantities, average hours per day, total number of workdays, and schedule, were based on CalEEMod default information for a project of this type and size (included in **Appendix A**). The estimated earliest possible construction start date for the baseball field would be June 2026, the T-Wing building would be June 2027, and the terrace building would be May 2029. It is also estimated that each of these phases would be built out over approximately 1 to 2 years. However, the active construction for these phases that include major diesel equipment and intensive activities would occur for shorter periods of time. Less intensive construction activities and workers using smaller electric equipment would occur during the rest of the estimated construction schedule. Therefore, the CalEEMod default schedules for each phase were used to represent the intensive construction periods with active use of major diesel equipment. The CalEEMod defaults calculated that the baseball field would be built out over a period of approximately 1 month and the T-Wing and terrace buildings would each be built out over a period of approximately 6 months, for a non-consecutive total of 13 months or 258 construction workdays.

The CalEEMod defaults calculated that the construction of the new administration building, the stadium expanded bleachers with a press box, and the stadium entrance and field house would

each be built out over a period of approximately 6 months, or 122 construction workdays. The earliest full year of operation was assumed to be 2031.

Construction Traffic Emissions. Construction would produce traffic in the form of worker trips and truck traffic. The traffic-related emissions are based on worker and vendor trip estimates produced by CalEEMod and haul trips that were computed per phase based on the demolition material to be exported, soil imported and/or exported to the site, and the amount of concrete and asphalt truck trips to and from the site. CalEEMod provides daily estimates of worker and vendor trips for each applicable phase. Daily haul trips for demolition and grading were developed by CalEEMod using the estimated demolition and soil import/export volumes. The amount of concrete and asphalt was estimated and converted to daily one-way trips, assuming two trips per delivery.

Summary of Computed Construction Period Emissions

Average daily emissions were annualized for each year of construction by dividing the annual construction emissions by the number of active workdays during that year. **Table 4** shows the average daily construction emissions of ROG, NO_X, PM_{10} exhaust, and $PM_{2.5}$ exhaust during construction of the project with use of Tier 4 interim equipment, as required by the District's SCM-1. As shown in **Table** 4, predicted average daily project construction emissions, would not exceed the Air District significance thresholds.

TABLE 4 - CONSTRUCTION PERIOD EMISSIONS

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Construction Emissions Total (Tons)				
2026 (Baseball Field)	0.004	0.18	0.001	0.001
2027 (T-Wing Building)	0.13	0.31	0.002	0.002
2029 (Terrace Buildings)	0.03	0.27	0.002	0.002
2030 (Administration Building, stadium expanded bleachers, and stadium entrance & field house)	0.16	0.84	0.01	0.01
Average Daily Construction Emissions (pounds/day)				
2026 (10 construction workdays)	0.78	36.81	0.28	0.27
2027 (127 construction workdays)	2.08	4.94	0.03	0.03
2029 (121 construction workdays)	0.43	4.54	0.03	0.03
2030 (122 construction workdays)	2.67	13.70	0.09	0.09
Air District Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	No	No	No	No

SOURCE: Illingworth and Rodkins, 2025

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be

an additional source of airborne dust after it dries. The Air District recommends all projects include a "basic" set of best management practices (BMPs) to manage fugitive dust and consider impacts from dust (i.e. fugitive PM_{10} and $PM_{2.5}$) to be less than significant if BMPs are implemented to reduce these emissions. Consistent with Air District-recommendations, the proposed project would implement **Mitigation Measure AIR-1, AIR-1 Air District's Best Management Practices**, which require implementation of basic BMPs for reducing fugitive dust. With implementation of the Air District basic set of BMPs outlined in **Mitigation Measure AIR-1**, uncontrolled fugitive dust emissions from construction would below the Air District single-source threshold. This impact would be ***less than significant with mitigation***.

Mitigation Measure AIR-1 Air District's Best Management Practices

The project shall incorporate the Air District's recommended basic BMPs to reduce construction emissions. The following measures shall be implemented during all phases of construction to control dust and exhaust at the project site:

- 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 mph.
- 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.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

c) Expose sensitive receptors to substantial pollutant concentrations?

Project impacts related to increased health risk can occur by generating emissions of TACs and air pollutants. The proposed project would introduce new sources of TACs during construction (i.e., on-site construction and truck hauling emissions). Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. The project

would not include any stationary sources of air pollutants and TACs and would not generate any increase in traffic since the school population is not proposed to increase.

Project impact to existing sensitive receptors were addressed for temporary construction activities. There are also several sources of existing TACs and localized air pollutants in the vicinity of the project. The impact of existing sources of TACs was assessed in terms of the cumulative risk which includes the project contribution.

Health Risks from Project Construction

The primary health risk impact issues associated with construction projects are cancer risks associated with diesel exhaust (i.e., DPM), which is a known TAC, and exposure to high concentrations of dust (i.e., $PM_{2.5}$). Both pose a potential health and nuisance impact to nearby sensitive receptors. Receptors include locations where sensitive populations would be present for extended periods of time (i.e., chronic exposures). This includes the existing residences, middle school, and preschool facilities near the project site as shown in **Figure 5 – Locations of Project's Maximum Exposed Individual Receptors**. The sensitive receptors that would experience the greatest risks and elevated $PM_{2.5}$ concentrations would be those closest and/or downwind of the project site. Weather conditions have been measured at the San Carlos Airport, which show winds flow primarily from the west-northwest towards the east-southeast. The project's temporary construction health risk impacts would likely be greatest at one of the single-family residences that are east/south-east of the construction sites. The temporary construction health risk impacts at the students on-campus would be less than off-site residences due to less intensive cancer risk exposure factors and not being on-campus during the summer when some construction activities would occur.

The CalEEMod model provided total uncontrolled annual PM_{10} exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. Total uncontrolled DPM emissions were estimated to be 0.01 tons (22 pounds) and fugitive dust emissions ($PM_{2.5}$) were estimated to be 0.03 tons (57 pounds). In compliance with the District's SCM-1, which requires using high tier engines, the proposed project would use construction equipment with low diesel particulate matter (DPM) emissions. All diesel-powered equipment over 50 horsepower operated on-site for more than two consecutive days or 20 total hours will meet U.S. EPA Tier 4 Interim standards. Alternatively, the contractor may submit a plan demonstrating reduced DPM emissions, which could include measures such as using electric or propane-powered equipment, installing electric power lines early, adjusting construction sequencing, or employing building techniques that minimize diesel use. The proposed project would also implement the Air District's basic BMPs outlined in **Mitigation Measure AIR-1**. The CalEEMod modeling calculated that the inclusion of Tier 4 Interim equipment would reduce the DPM emissions from temporary construction activities by approximately 79-percent or more. The CalEEMod modeling also calculated that the inclusion of basic BMPs to control dust would reduce the fugitive $PM_{2.5}$ emissions from temporary construction activities by approximately 34-percent or more. This would in turn decrease the health risk impacts from the project's temporary construction activities on the nearby estimated maximally exposed individuals (MEIs) and sensitive receptors, both residential and school receptors.

Considering the use of modern construction equipment that meets Tier 4 Interim standards, the standard Air District's basic BMPs to control dust, the location of nearby sensitive receptors with respect to proximity to the construction sites and local meteorological data, and the temporary nature of these construction emissions, the project's temporary construction health risk impact would be below the Air District's single-source thresholds identified in **Table 5 – Bay Area Air District's Health Risk Thresholds**.

TABLE 5 - BAY AREA AIR DISTRICT'S HEALTH RISK THRESHOLDS

Health Risks and Hazards	Single Sources / Individual Projects		Combined Sources (Cumulative from all sources within 1000-foot zone of influence)	
Excess Cancer Risk	>10 in a million	OR	>100 in a million	OR
Hazard Index	>1.0	Compliance with Qualified Community Risk Reduction Plan	>10.0	Compliance with Qualified Community Risk Reduction Plan
Incremental annual $PM_{2.5}$	>0.3 µg/m^3		>0.8 µg/m^3	

NOTES: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. VMT = vehicle miles traveled.

* The Air District strongly recommends implementing all feasible fugitive dust management practices especially when construction projects are located near sensitive communities, including schools, residential areas, or other sensitive land uses.

Cumulative Health Risks of all TAC Sources at the Off-Site Estimated MEIs

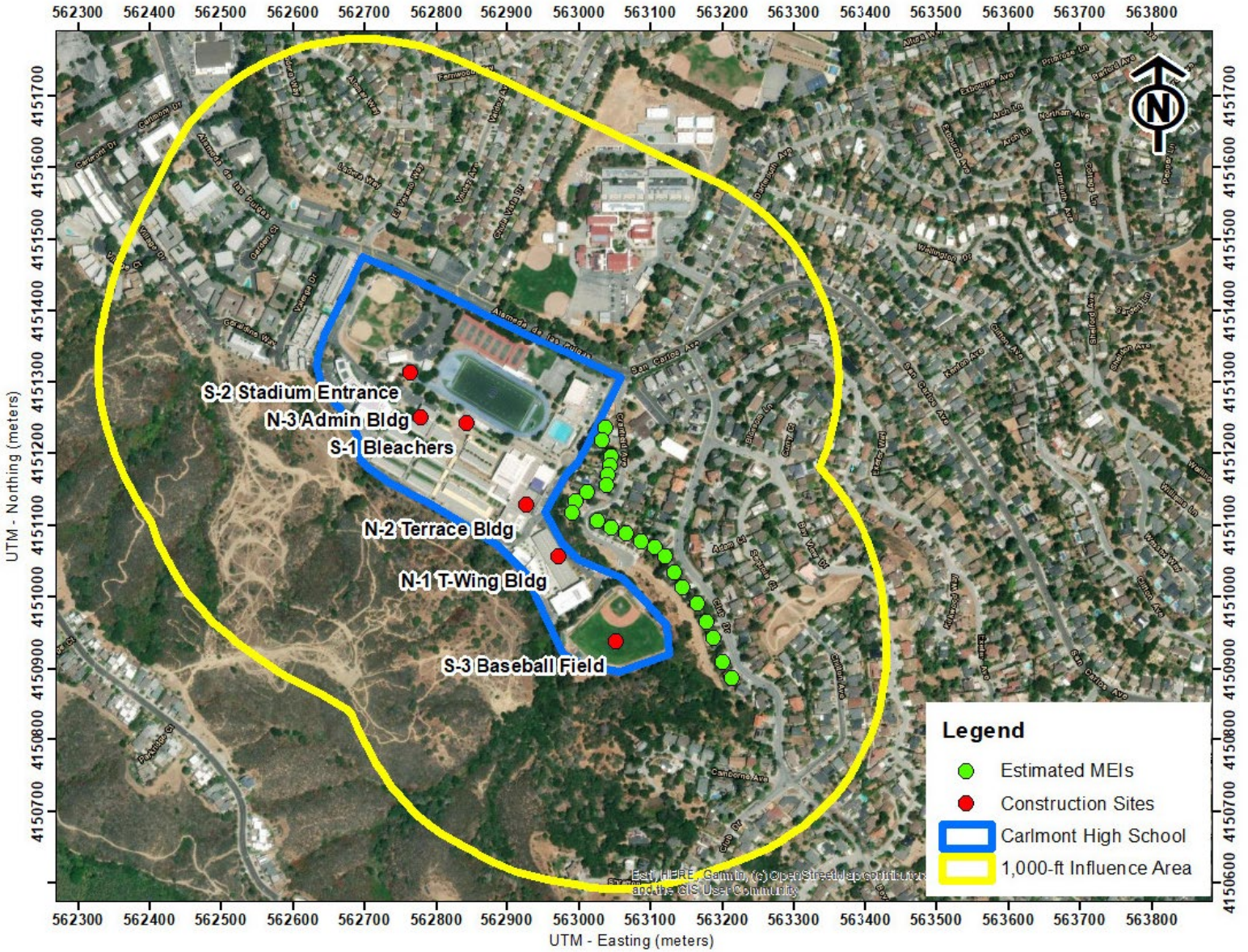
Cumulative health risk assessments look at all substantial sources of TACs located within 1,000 feet of a project site (i.e., influence area) that can affect sensitive receptors. These sources include rail lines, highways, busy surface streets, and stationary sources identified by the Air District.

A review of the project area using the Air District's geographic information systems (GIS) screening maps identified the existing health risks from nearby roadway and stationary sources at the estimated MEIs. The local roadways and one existing stationary source of TACs were identified with the potential to affect the estimated MEIs. There were no stationary sources located within the 1,000-foot influence area. **Figure 5** shows the locations of the sources affecting the estimated MEIs within the influence area. Health risk impacts from these sources upon the estimated MEIs are reported in **Table 6 - Impacts from Combined Sources at Estimated MEIs**.

Nearby Local Roadways

The project site is located in a residential area with nearby local streets. Cancer risk, $PM_{2.5}$ concentrations, and Health Index (HI) associated with traffic on the nearby roadways were estimated using the Air District screening values provided via GIS data files (i.e., raster files).[7] The Air District raster files provide screening-level cancer risk, $PM_{2.5}$ concentrations, and HI for

[7] Bay Area Air District, Health Risk Screening and Modeling, 2022. Web: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling



Source: Illingworth & Rodkin,2025

FIGURE 5

Locations of Project's Maximum Exposed Individual Receptors
Carlmont High School Facilities Master Plan

roadways within the Bay Area and were produced using AERMOD and 20x20-meter emissions grid. The Air District's analysis uses EMFAC2021 data for vehicle emissions and fleet mix for roadways and provides guidance for risk assessment assumptions.[8] These estimates represent conservative risks reflective of 2022 conditions and are meant to provide a conservative estimate of future conditions, which do not reflect the increased proportion of zero emission motor vehicles that will result in lower future emissions.[9] These screening values are considered higher than values that would be obtained with refined modeling methods. These raster data are based on region-wide emissions rather than just those that occur within 1,000 feet of the project. Screening-level cancer risk, $PM_{2.5}$ concentration, and HI for the cumulative roadway impacts at the estimated MEIs are listed in **Table 6** - **Impacts from Combined Sources at Estimated MEIs**.

Bay Area Air District Permitted Stationary Sources

Permitted stationary sources of air pollution near the project site were identified using the Air District's Permitted Stationary Sources 2023 GIS website,[10] which identifies the location of nearby stationary sources and their estimated risk and hazard impacts, including emissions and adjustments to account for OEHHA guidance. There were no identified sources found within the project's 1,000-foot influence area using this tool.

Summary of Cumulative Health Risk Impact at Project MEI

Table 6 - Impacts from Combined Sources at Estimated MEIs reports both the project and cumulative health risk impacts at the sensitive receptors most affected by construction (i.e., the MEI). As described in **Section 3.2.4, FMP Project Construction,** the proposed project would be required to comply with the District's SCM-1. Therefore, all diesel-powered equipment over 50 horsepower operated on-site for more than two consecutive days or 20 total hours will meet U.S. EPA Tier 4 Interim standards. The proposed project would be also required to implement **Mitigation Measure AIR-1**. With the use of U.S.EPA Tier 4 Interim equipment and implementation of **Mitigation Measure AIR-1** to control dust, the project construction risk and hazard levels would not exceed their respective Air District single-source significance thresholds. The project also would not exceed any Air District cumulative-source thresholds. This impact would be ***less than significant with mitigation***.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors. However, they would be localized and are not likely to adversely affect people off-site by resulting in confirmed odor complaints. The project would not include any sources of significant odors that would cause complaints from surrounding uses. This impact would be ***less than significant***.

[8] Air District's CEQA Air Quality Guidance (Appendix E).
[9] Bay Area Air District, 2022 CEQA Air Quality Guidelines Appendix E, Section 9, April 2023.
[10] Bay Area Air District, https://experience.arcgis.com/experience/89ba715c4dc7427f85e2d2fc5b8175ff/page/Stationary-Source-Screening-Tool

TABLE 6 - IMPACTS FROM COMBINED SOURCES AT ESTIMATED MEIS

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts			
Project Construction	<10.0	<0.3	<1.0
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold?	*No*	*No*	*No*
Cumulative Impacts			
Cumulative Roadways – Air District Screening GIS Data	1.68	0.07	0.01
Cumulative Total	<11.68	<0.37	<1.01
BAAQMD Cumulative Source Threshold	***100***	***0.8***	***10.0***
Exceed Threshold?	***No***	***No***	***No***

SOURCE: Illingworth & Rodkins, 2025

6.4 Biological Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
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?	☐	☐	☐	☒

6.4.1 Environmental Setting

The analysis of biological resources presented below is based on a survey of the project site conducted on March 31, 2025 and a search of the most recent version of the California Department of Fish and Wildlife (CDFW) Natural Diversity Database (CNDDB) and the California Native Plant Society's (CNPS) *Inventory of Rare and Endangered Plants of California*. The records search results are included in **Appendix B** of this Initial Study.

Existing Landcover Types, Vegetation Communities, and Habitat

The majority of the project site consists of developed areas, including concrete hardscape and landscaped grounds associated with the existing high school. Unlandscaped portions are mainly limited to the margins of the irrigated baseball field on the east, west, and south sides. These areas are dominated by disturbed (ruderal) herbaceous vegetation with scattered woody plants, reflecting prior grading and site modification, including the formation of a raised pad and stockpile area along the southern boundary.

Landscaped areas include irrigated turf fields, lawns, and planters with a mix of ornamental and native trees, shrubs, and grasses. Less maintained areas support non-native grasses and forbs typical of disturbed urban environments.

Wildlife observed or expected on the site includes common bird and reptile species adapted to human activity, with occasional use by woodland species from adjacent areas.

Along the site's edges, particularly near the baseball field, ruderal vegetation transitions into a disturbed oak woodland community. This woodland represents an ecotone between the developed school grounds and the more intact native woodland on surrounding slopes. It features a mixed canopy of native and non-native trees, with an understory of both native and introduced shrubs and herbs. A 1-foot wide concrete V-ditch associated with the original storm drain system runs just west, east, and south of the baseball field through this community, situated between approximately 5 and 30 feet above the field level. The V-shaped ditch was installed by the District to manage runoff from the slope within the school boundaries and prevent water from reaching the field. The ditch runs parallel to the third base line, with water flowing from east to west. As runoff enters the exposed ditch, it is collected and directed into a transfer pipe, which conveys the water beneath the concrete walkway. The pipe discharges into a swale, which channels the water directly to a storm drain inlet.

Overall, vegetation and wildlife within the project boundary are characteristic of highly disturbed, human-influenced environments, with limited native habitat remaining except along the woodland margins.

Wildlife Corridors

Wildlife corridors are linear or regional habitat linkages that connect fragmented natural areas, allowing animals to travel, migrate, and maintain genetic exchange across developed landscapes (Beier and Loe 1992). These corridors enable wildlife to move in response to environmental changes or disturbances and to recolonize areas where populations have been lost. Regional corridors support broad-scale movement and dispersal, while local corridors provide access to essential resources such as food, water, and cover.

The site is a fully operational high school, established in 1952. There are no wildlife corridors on the project site.

Special-Status Species

The potential for special-status species at the project site was analyzed through a review of the CDFW, CNDDB, and a site visit. Special-status species are legally protected or recognized as vulnerable to habitat loss. No special-status plant or animal species have been mapped on or adjacent to the project site in more than 50 years. Due to the site's fully developed nature, most special-status species known to the region are not expected to occur because suitable habitat is lacking.

- **Special-Status Plants:** A total of 23 special-status plant species are known to occur in the project area. These plant occur in specialized habitats such as woodland, chaparral, coastal scrub, grassland, coastal prairie, forest or marshes and swamps, but its habitat is not present on the site, such as chaparral, coastal prairie, or marshes. Only the oak woodland

surrounding the baseball field on the east, west and south sides, where a v-ditch was historically constructed to manage stormwater, provides habitat for special-status plants at the project site. While this area was initially heavily disturbed when the baseball field and stormwater infrastructure were constructed as part of the high school and is highly invaded by blue gum and French broom, the surrounding hillslopes are still characterized as oak woodland habitat with a ruderal grassland understory.

- **Special-Status Animals:** A total of 17 special-status animal species are known to occur in the region. Due to the nearly fully developed conditions of the project site as an actively operating high-school, only three species, Crotch's bumblebee, pallid bat and San Francisco dusky-footed woodrat, have any potential to occur.

  - **Crotch's bumble bee** (*Bombus crotchii*) is a candidate species with no current state or federal listing. Historically widespread in southern California, its range has contracted due to agricultural intensification and urbanization. In California, it inhabits open grassland and scrub habitats, foraging on a variety of short-corolla flowers and nesting primarily in underground burrows. Queens fly from late February to late October, and workers and males from late March to September. Overwintering sites are generally in soft soil or leaf litter.
    The closest CNDDB record is from 1909, approximately 8.2 miles southeast of the project site, with a more recent 2025 sighting at Jasper Ridge Biological Preserve, about 7.4 miles to the south-southeast. While no rodent burrows were observed during site surveys, landscaping and unlandscaped areas provide foraging habitat, and woody debris offers potential nesting sites.

  - The **pallid bat** (*Antrozous pallidus*) is a California species of special concern. While this designation does not confer legal protection, it likely meets CEQA's definition of a "rare" species (14 CCR §15380).
    This bat is common at low elevations throughout most of California, favoring open, dry habitats with rocky areas for roosting. Day roosts occur in caves, crevices, mines, hollow trees, and occasionally buildings, while night roosts can be in more open structures. It is a social species, roosting in groups of 20 or more, and is sensitive to human disturbance.
    The only occurrence of this species near the project site (approximately 0.2 miles) dates back from 1952. The project site is largely an active, high-traffic high school in a dense urban area, reducing its suitability; however, marginally suitable woodland habitat exists around the eastern baseball field, providing a suitable habitat for this species.

  - The San Francisco dusky-**footed woodrat** (*Neotoma fuscipes annectens*) is a California Species of Special Concern with no federal protection status. It inhabits forested, wooded, and riparian habitats throughout California and is commonly associated with dense vegetation such as poison oak, willow, and oak woodlands. Nests are typically built from sticks either on the ground or in vegetation and may persist for decades.
    In San Mateo County, two known occurrences of this subspecies have been documented within three miles of the project site, both west of Highway 280—the nearest record from 2001 located approximately two miles west near Upper Crystal Springs Reservoir. Although Highway 280 likely limits dispersal between these known

populations and the project site, the woodland habitat adjacent to the baseball field provides suitable conditions for the species.

Nesting Birds

Birds such as the Red-tailed Hawk, Cooper's Hawk (*A. cooperii*), and Red-shouldered Hawks are all known from the area and could nest on the project site. Common song birds (passerine birds) could also nest on the project site. All of these birds are protected under the Migratory Bird Treaty Act (50 CFR 10.13) and their eggs and young are protected under California Fish and Game Code Sections 3503, 3503.5.

Sensitive and Regulated Plant Communities and Habitats

There is no riparian habitat or sensitive natural community on the project site that has been identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

Wetlands

The project site does not have any wetlands on or located within the zone influence of the project site

The concrete v-ditch located west, east, and south of the baseball field, was constructed to capture runoff from the slope within the school boundary, and direct flows northward into the storm drain system. The surrounding slopes generate minimal runoff.

Under federal jurisdiction, the U.S. Environmental Protection Agency (EPA) and the U.S. Army Corps of Engineers define Waters of the United States as those having a continuous surface connection to other regulated waters. The V-ditch was installed to manage overflow from the slope and therefore it does not convey off-site flow and lacks a contiguous surface connection to jurisdictional waters.

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 the U.S. Fish and Wildlife Service?

Special-Status Plant Species. As described above, 23 special-status plant species have been documented in the broader project region. The project site provides marginally suitable habitat for special-status plant species. Only the oak woodland surrounding the baseball field on the east, west and south sides provides habitat for special-status plants at the project site. These species could include: Franciscan onion, San Mateo woolly sunflower, Crystal Springs lessingia, small-flowered monolopia, white rayed pentachaeta, chaparral ragwort, bent-flowered fiddleneck, San Francisco campion, San Mateo thorn-mint, Hillsborough chocolate lily, fragrant fritillary, Marin dwarf flax, Western bewildering bushmallow, San Francisco owl's clover, San Francisco collinsia and Western leatherwood. Activities associated with the proposed FMP at the project site could result in the loss of these species, which would be considered a significant impact. Implementation of **Mitigation Measure BIO-1a, Special-Status Plants**, which requires surveys for special-status plans prior to any construction activity within the oak woodland near the baseball field, would reduce project impact on special-status plants to a ***less-than-significant*** level.

Special-Status Animal Species. A total of 17 special-status wildlife species have been documented within the project region. However, as noted above, only three species, pallid bat, San Francisco dusky-footed woodrat, and crotch's bumble bee have a potential to occur.

Pallid bat. Although the pallid bat can roost on buildings and occasionally in large tree hollows, it is highly sensitive to human disturbance. Because most of the project site is an active, heavily trafficked high school surrounded by high-density urban development on three sides, suitable habitat is likely limited to the trees around the baseball field in the southeast portion of the site. These trees, located in a less-disturbed area, may provide roosting and maternity habitat for the pallid bat. Potential project-related impact on this species would be significant. The proposed project would implement **Mitigation Measure BIO-1b, Pre-Construction Survey for Pallid Bat** to reduce this impact to a ***less-than-significant*** level.

San Francisco dusky-footed woodrat. The oak woodland surrounding the baseball field at the southeast edge of the project site provides suitable habitat for the San Francisco dusky-footed woodrat (Neotoma fuscipes annectens), a California species of special concern. This woodrat typically remains within dense cover and forages locally. The proposed project construction activities within the existing baseball field and adjacent ruderal areas within the chain-link fence are unlikely to affect this species. However, project activities at the oak woodland beyond the fence would affect the San Francisco dusky-footed woodract, which would be considered a significant impact. The proposed project would implement **Mitigation Measure BIO-1c, Pre-Construction Survey for the San Francisco Dusky-Footed Woodrat** to reduce this impact to a ***less-than-significant*** level.

Crotch's bumble bee. While most of the project site is developed and surrounded on three sides by high-density urban areas, landscaping and ruderal vegetation in undeveloped portions of the site, such as around the baseball field at the southeast edge, provide marginally suitable foraging habitat for the crotch's bumble bee, and wood piles in this area offer potential nesting habitat. The project site lies within the species' current known range, and there are recent records within 10 miles. Therefore, this species could be present at the project site. The proposed project activities during construction may affect this species, which would be a potentially significant impact. Implementation of **Mitigation Measure BIO-1d, Pre-Construction Surveys for Crotch's Bumble Bee** would reduce this impact to a ***less-than-significant*** level.

With implementation of **Mitigation Measures BIO-1b**, through **BIO-1d**, the proposed project's impact on special-status animal species would be **less than significant**.

Nesting Birds. Red-tailed Hawks, Cooper's Hawks (Accipiter cooperii), and Red-shouldered Hawks have been documented in the project area and could potentially nest on the site. Common passerine birds may also nest within the site boundaries. The large diameter oak, redwood trees and eucalyptus trees (as well as some of the larger ornamental trees) on the project site provide potential nesting habitat for urban-adapted raptor species known from this area such as Red-tailed Hawk, Cooper's Hawk, and Red-shouldered Hawk. However, the high level of disturbance in the project area and the more isolated distribution of these trees, excepting the area around the baseball field, discourages raptors from nesting on the project site. Nonetheless, these trees as well as some of the large shrubs, on the campus proper, as

well as those trees within the oak woodland around the baseball field, provide nesting habitat for passerine (perching) bird species.

The buildings onsite also provide nesting habitat for urban-adapted songbirds such as Black Phoebe (*Sayornis nigricans*), House Sparrow (*Passer domesticus*), and House Finch that nest under the buildings' eaves, on lighting structures, and in cavities on building exteriors. All of these bird species are protected under the Migratory Bird Treaty Act (50 CFR 10.13), and their eggs and young are protected under California Fish and Game Code Sections 3503 and 3503.5. Project-related activities could result in disturbance to nesting birds or, in some cases, injury or mortality to adults or young. Potential project impact on these birds species during construction would be significant. The proposed project would implement **Mitigation Measure BIO-1e**, detailed below, which require a pre-construction survey to reduce impact on nesting birds.

With the implementation of **Mitigation Measures BIO-1a** and **BIO-1e**, the project potential impact on special-status plant and animal species and nesting birds would be ***less than significant***.

Mitigation Measure BIO-1a: Special-Status Plants

1. **Preconstruction Plant Surveys**
   Prior to any grading or construction within the oak woodland surrounding the baseball field on the east, west, and south sides, special-status plant surveys shall be conducted during the species' peak blooming periods to maximize detectability. To ensure coverage of all federally listed (protected under the Federal Endangered Species Act), state-listed (protected under the California Endangered Species Act), and/or the California Native Plant Society (CNPS) (*Inventory of Rare and Endangered Plants of California* Rank 1B or 2 species)[11] with potential to occur on the project site, surveys shall be conducted in March, May, and August before commencing work in the oak woodland. All surveys shall comply with the most current guidelines published by the California Department of Fish and Wildlife (CDFW), the U.S. Fish and Wildlife Service (USFWS) , and the California Native Plant Society (CNPS). Construction activities in the oak woodland shall not begin until surveys are completed and any required mitigation measures are implemented. For any special-status plant species identified onsite during the surveys, a CNDDB form will be completed and submitted to CDFW.

2. **Federally or State Listed Plant Species**
   If federally or state-listed plant species are identified during surveys, all individuals or populations shall be avoided to the maximum extent feasible. If avoidance is not practicable while meeting the project's objectives, mitigation measures shall be developed in consultation with the appropriate regulatory agencies based on the species' protection status: CDFW for State-listed plants and USFWS for federally listed plants. All agency-approved mitigation prescriptions shall be incorporated in the construction contracts.

[11] Rank 1B species are rare, threatened, or endangered in California and elsewhere; Rank 2 species are plants presumed extirpated, rare, threatened, or endangered in California but more common elsewhere.

- Federally Listed Plants: If any federally listed plant species occur within the project footprint, the District shall prioritize avoidance. If avoidance is not feasible, the District shall notify the USFWS within five days of the finding, and the agency's permitting requirements shall be incorporated into the project construction contracts. As required, an "incidental take" permit from the USFWS may be necessary for any proposed impacts. Prior to construction, the District shall obtain either the permit or a written confirmation from the USFWS indicating that avoidance and/or protection measures are sufficient and that an incidental take permit is not required.

- State-Listed Plants: If any State-listed plant species are present within the project footprint, protection measures shall be developed in consultation with CDFW. The District shall obtain an Incidental Take Permit (ITP) from CDFW prior to beginning work within the affected area. Any conditions specified in the ITP shall become enforceable project conditions implemented and monitored by the District.

- CNPS Rank 1B and 2 Plant Species: If any CNPS Rank 1B and 2 plant species are present, a qualified biologist will collect seeds, propagules, topsoil, or other plant material for transplantation. Half of the collected material will be stored long-term at a botanical garden or museum (e.g., Rancho Santa Ana Botanic Garden), and the other half will be planted on a protected area onsite or at an offsite mitigation site. The area will be fenced to protect the plants. The District shall conduct annual monitoring of the transplanted population for a period of five years. The District shall submit annual monitoring reports documenting the success or failure of the transplanting effort to CDFW by December 31 of each monitoring year. If the initial transplanting or seeding effort fails, seeds and topsoil from long-term storage may be re-sown at an alternate suitable location (onsite or offsite) approved by CDFW. The District shall monitor this additional effort for three years.

Mitigation Measure BIO-1b: Pre-Construction Surveys for Pallid Bat

To avoid impacts to roosting pallid bats or other special-status bats, tree removal around the baseball field should be conducted during seasonal periods when bats are not dependent on roosts: between August 31 and October 15, when bats are volant and feeding independently, or between March 1 and April 1, prior to maternity colony formation and after hibernation. A qualified biologist, with at least two years of experience surveying for bats, shall conduct preconstruction surveys within 14 days prior to tree removal around to the baseball field. If evidence of bat roosts is observed, the biologist shall develop a removal and exclusion plan in consultation with CDFW.

If tree removal must occur outside of these seasonal windows (October 16–February 28/29 or April 2–August 30), a qualified biologist shall conduct preconstruction surveys within 14 days of work initiation. If roosts are identified, the biologist shall determine whether young are present. Maternity roosts shall be avoided by establishing a non-disturbance buffer until young are independent, with buffer size determined by the biologist. For non-maternity roosts, the biologist shall develop a removal and exclusion plan in coordination with CDFW.

Mitigation Measure BIO-1c: Pre-Construction Survey for the San Francisco Dusky-Footed Woodrat

Prior to the start of grading or construction within the oak woodland areas of the project site, a qualified biologist shall survey oak woodland surrounding the baseball field within 50 feet of proposed disturbance zones for San Francisco dusky-footed woodrat nests (large stick nests) no more than 30 days before site grubbing, grading, tree removal. Since woodrats occupy their nests year-round, surveys may be conducted at any time of year. Identified nests shall be flagged in the field and mapped on project plans.

If nests are found, they shall be avoided wherever feasible. If avoidance is not possible, nests shall be manually deconstructed only when helpless young are absent, typically during the non-breeding season (October through January). If young are likely present during pre-construction surveys, a non-disturbance buffer shall be established by the qualified biologist, considering nest location, proposed impacts, and site topography. This buffer, typically 20–50 feet, shall remain in place until the young are independent and able to leave the nest, after which the nest may be safely deconstructed.

Mitigation Measure BIO-1d: Pre-Construction Surveys for Crotch's Bumble Bee

If construction will occur during the crotch's bumblebee flying season (March through August), a qualified biologist shall conduct preconstruction surveys for active bumblebee colony nesting sites in any previously undisturbed and/or natural/landscaped areas prior to the start of ground disturbing activities. At least three surveys (during March and April) must be conducted within 100 feet of any work areas in vegetated areas. The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F), on sunny days with wind speeds below 8 miles per hour, and at least 2 hours after sunrise and 3 hours before sunset as these are the best conditions to detect bumblebees. Surveyors shall conduct transect surveys focusing on detection of foraging bumblebees and underground nests using visual aids such as binoculars.

If no Crotch's bumblebees or potential Crotch's bumblebees are detected or other CDFW candidate bumble bees, no further mitigation is required. If potential Crotch's bumblebees or other CDFW candidate bumble bees are seen but cannot be identified, the District shall obtain authorization from CDFW to use nonlethal netting methods to capture bumblebees to identify them to species. If protected bumblebee nests are found, a plan to protect bumblebee nests and individuals to ensure no take of Crotch's bumblebee or other protected bumblebees will be developed by a qualified biologist in consultation with the School District.

Mitigation Measure BIO-1e: Pre-Construction Surveys for Nesting Birds.

To avoid impacts to nesting birds, a qualified biologist shall conduct a preconstruction nesting survey within seven days prior to the start of construction or tree removal occurring between February 1 and August 31. The survey shall include all trees, landscaping, ruderal vegetation, and buildings on the project site and within 200 feet of the work areas, encompassing the zone of influence where birds could be disturbed by construction noise or earth-moving activities.

If active nests are identified within the project site or zone of influence, the biologist shall establish a temporary protective buffer around each nest. Buffers shall be marked with orange construction fencing and sized to prevent disturbance, with typical distances of 50 feet for small

birds and up to 300 feet for sensitive raptors or other species of concern. The final buffer size shall be determined by the qualified biologist based on the species and site conditions.

No construction or earth-moving activities shall occur within the buffer until September 1, unless a qualified biologist determines that the young have fledged and are capable of avoiding construction hazards, or that the nesting cycle is otherwise complete. In this region, most species complete nesting by mid-July, though timing may vary by species. Once nesting is complete and young have fledged, temporary buffers may be removed, and construction may proceed within previously protected areas.

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 the U.S. Fish and Wildlife Service?

There is no riparian habitat or sensitive natural community at the project site that has been identified in local or regional plans, policies, regulations, or by the CDFW or USFWS. Therefore, the proposed project would have ***no impact*** on any riparian habitat or other sensitive natural community.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The project site does not contain any wetland features, nor are any wetlands located within the project's area of influence. As previously noted, the V-ditch located near the baseball field was installed by the District to manage runoff from the upslope area within the school boundaries and to prevent water from entering the field. The ditch runs parallel to the third base line, with runoff flowing from east to west. Surface runoff was historically collected in the exposed ditch and conveyed to a transfer pipe, which carried water beneath the concrete walkway and discharged into a swale that directed flow to a storm drain inlet.

The V-ditch is broken and discontinuous at several locations and appears to be nonfunctional. In addition, the upslope storm drain system shows no evidence of active flow. Accordingly, none of these features meet the criteria for jurisdictional waters.

The proposed project would disturb more than 10,000 square feet of land, resulting in increased and/or replacement of impervious surfaces and the potential for stormwater runoff to carry pollutants into the City's storm drain system, which ultimately discharges to downstream receiving waters. The District would comply with the State Water Resources Control Board's Municipal Regional Permit (MRP), which requires incorporating reduction in surface water drainage pollution runoff and establishing stormwater control measures that include Low Impact Development (LID) techniques, such as infiltration, bio-retention, and flow control, to minimize pollutant discharge and eliminate non-stormwater flows. All new buildings and site improvements as part of the proposed FMP, such as the improvements near the baseball field, would be designed and constructed following these standards.

Therefore, the proposed project would have ***no impact*** on state or federally protected wetlands.

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?

The project site does not support native resident or migratory wildlife movement, established corridors, or nursery sites. Although undeveloped land south of the site may function as a local wildlife corridor, this area would remain unaffected apart from temporary, localized disturbance near the baseball field improvements. Because no expansion beyond the current campus boundaries is proposed, impacts to wildlife movement are not anticipated. Therefore, the proposed project would have *a less-than-significant impact* on the movement of native resident or migratory wildlife species, wildlife corridors, or wildlife nursery sites.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The trees inventoried at the project site in areas where the proposed FMP improvements would occur are summarized in the **Table 7 – Potential Impacted Trees**, below.

TABLE 7 - POTENTIAL IMPACTED TREES

Project Area	Potentially Impacted Protected Trees	Notes
Existing Administrative Building (N-3)	1 red maple, 2 coast redwoods, 1 camphor, 2 coast live oaks, 2 ash	May be affected by new admin/student support building construction
West End of Football Field (S-2)	4 coast redwoods, 1 coast live oak	May be impacted by new stadium entrance and field house
Existing T-Wing Building (N-1)	2 coast redwoods	May be impacted by new 3-story classroom and enlarged quad
South Side of Football Field (S-1)	7 coast live oaks	May be impacted by new bleachers, shade structures, and snack shack relocation
Baseball Field (S-3)	17 Aleppo pines, 4 coast live oaks, 1 Colorado spruce, 1 blue gum, plus additional blue gums and coast live oaks along east, west, and south sides	Extent of impact to be determined pending final design footprint and tree survey

SOURCE: M&A, 2025

The District defines heritage trees as native trees with a diameter at breast height (DBH) greater than 15.2 inches. Native species, including Coast Live Oak, Valley Oak, Redwood, Madrone, Bay Laurel, and Buckeye, are classified as protected trees if they have either a single main stem of 10 inches or greater DBH, or up to three largest secondary stems that together total 10 inches or more DBH. The removal or alteration of protected trees as defined above would be considered a potentially significant adverse impact. The proposed project would implement **Mitigation Measure BIO-2, Tree Protection Plan**, outlined below, to reduce the project impact on protected trees. **Mitigation Measure BIO-2** would require surveying the trees near the proposed construction areas and preparing a Tree Protection Plan before beginning construction. With implementation of **Mitigation Measure BIO-2**, the project impact on native trees and protected trees, would be ***less than significant***.

Mitigation Measure BIO-2. Tree Protection Plan

Prior to project commencement, a qualified arborist shall conduct a tree survey at the project site and prepare an Arborist Report. Any native trees large enough to qualify as a protected tree shall have appropriate tree protection measures if disturbance is proposed within the dripline of any of these trees to prevent impacts. Trees of sufficient diameter to be considered a protected tree that cannot be preserved shall be replaced with a native or locally acclimated tree of minimum 15 gallons, as part of a landscape plan, screening, or bulk reduction condition.

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?

The project site is not located within an area covered by an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, the project would not conflict with any such plans. There be no ***impact***.

6.5 Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

The analysis is this section is based on the Cultural Resources Assessment Report prepared for the Carlmont High School.[12]

6.5.1 Environmental Setting

Prehistoric Context

Human settlement in North America began approximately 9,000–11,500 years ago, with adaptations in subsistence and settlement patterns linked to environmental changes at the onset of the current interglacial period. In California, cultural development is commonly described through the Paleo-Indian, Archaic, and Pacific periods. The transition from Paleo-Indian to Archaic is marked by technological refinements, reduced reliance on megafauna, and increasing regional specialization in tools and subsistence. The Archaic period (spanning about 8,000 years) is further characterized by the development of ritual traditions and extensive trade networks for materials such as obsidian and shell. The Pacific period reflects continued environmental adaptation, with settlement dispersal into riverine and bayshore areas, intensified use of resources such as shellfish and acorns, and cultural shifts associated with the Berkeley Pattern. Between 4,500 and 2,000 years ago, the spread of Utian peoples into the Bay Area and Central Coast replaced earlier Hokan groups, establishing the ancestral populations of the Miwok and Ohlone who occupied the region into the Historic Period.

Ethnography

The project area lies within the traditional territory of the Ramaytush Ohlone, one of several autonomous groups within the broader Ohlone (Costanoan) linguistic designation. Ohlone territory extended from the San Francisco Bay south to the Sur River and east to the Diablo Range. The Ohlone lived in relatively sedentary communities organized into numerous tribelets

[12] Brunzell Historical. 2025. Cultural Resources Assessment Report. Carlmont High School. July.

and practiced hunting and gathering with careful land management. Their diet centered on acorns, supplemented by roots, berries, other vegetation, seafood, and game.

Historic Context

The historic era in California is typically divided into three periods: the Spanish Mission Period (1769–1821), the Mexican Rancho Period (1821–1848), and the American Period (1848 to the present).

Spanish Period (1769–1821)

The Spanish Period (1769–1821) is marked by exploration of the region, the founding of Mission San Francisco de Asís and Mission Santa Clara de Asís, and the introduction of livestock, agriculture, and European architectural and construction practices. Although political control shifted in 1821, Spanish influence persisted through the continued operation of the mission system.

Mexican Period (1821–1848)

In 1821, Mexico gained independence from Spain, leading to the decline of the missions. The 1833 Secularization Act stripped missions of their lands and released their neophytes. In 1835, Governor José Castro granted the 35,000-acre Rancho de las Pulgas to Maria Soledad Ortega de Argüellos, encompassing areas that would later become San Mateo, Belmont, San Carlos, Redwood City, Atherton, and Menlo Park.

American Period (1848–Present)

The American Period (1848–present) began with the Treaty of Guadalupe Hidalgo, and in 1850, California was admitted to the United States, driven largely by the population boom from the 1849 Gold Rush.

San Mateo County

The first known inhabitants of San Mateo County were the Ramaytush Ohlone, who lived throughout the San Francisco Peninsula. San Mateo County was established in 1856, separating from San Francisco County, and the City of San Mateo was formally incorporated in 1894 following the development of the area by Charles Polhemus along the San Francisco–San Jose Railroad (1863). The railroad facilitated rapid agricultural growth, with artichokes and Brussels sprouts as key crops. During Prohibition, the county's rural coast was used for bootlegging, and by the 1920s, San Mateo County had gained recognition for golf and polo, attracting San Francisco families. That decade also saw the construction of the first bridge connecting the county to Hayward.

Following World War II, San Mateo County experienced rapid population growth, increasing from about 110,000 residents in 1940 to roughly 560,000 by 1970, and approximately 720,000 by 2025. Housing development expanded significantly, while public transportation improvements lagged due to the rise of automobile use. The county focused on upgrading major transportation routes, including Bayshore Highway and the San Mateo–Hayward Bridge, establishing San Mateo County as a key regional corridor.

City of Belmont

The City of Belmont, located in San Mateo County, was originally part of Rancho de las Pulgas, a Mexican land grant awarded to José Darío Argüello. After California achieved statehood in 1850, the Belmont area was initially included within San Francisco County until the formation of San Mateo County in 1856. Belmont briefly served as the county seat before administrative functions were relocated to Redwood City.

In the mid-19th century, English steamship captain Owen O'Neill operated a ferry service transporting passengers and freight between Belmont and San Francisco via local marshes and creeks. During this period, many San Francisco residents built weekend cabins in the area. The arrival of the San Francisco–San Jose Railroad in the early 1860s and the establishment of a Southern Pacific Railroad depot in 1867 (which remained in operation until 1952) further stimulated local growth.

Belmont was officially incorporated as a city in 1926. Its name derives from the Italian phrase *belle monte*, meaning "beautiful mountain." With the rise of the automobile, Skyline Boulevard was completed in 1919, linking Belmont to the emerging state highway system, followed by construction of the Bayshore Highway in 1927.

Sequoia Union High School District

The Sequoia Union High School District (SUHSD), established in 1895, serves southern San Mateo County, including Atherton, Belmont, East Palo Alto, Ladera, San Carlos, Menlo Park, Portola Valley, Redwood City, and Woodside. Sequoia High School, founded the same year in Redwood City, opened with 53 students and three instructors, aiming to prepare students for Stanford University. Early school buildings were primarily wood-frame, often converted from houses or commercial structures, but by the early 20th century, educational reforms and the Progressive Education Movement promoted child-centered design, fire-resistant materials, and improved ventilation and natural lighting. Open-air classrooms, low-spread layouts, and large windows became common, while schools also functioned as community centers, incorporating auditoriums, libraries, and outdoor spaces. Architectural styles in California often drew on Spanish and Mediterranean revival influences.

By the 1920s, SUHSD outgrew its downtown Redwood City campus and acquired a 35-acre estate for a new campus, which opened in 1924 with 345 students. The new campus, designed by architects Coffey and Werner, featured Spanish-inspired architecture typical of the era, while state-mandated earthquake safety standards influenced school design, favoring one- and two-story layouts with separated classroom wings. The high school movement expanded rapidly on the West Coast, providing education and assimilation programs for a growing immigrant population. Following World War II, San Mateo County experienced explosive population growth, leading to a severe school shortage. SUHSD responded by planning new high schools, including Menlo-Atherton High School and Carlmont High School, with voters approving a $2.15 million bond in 1949 to fund these new facilities and improvements to the existing Sequoia High School campus.

Clyde L. Ogden served as SUHSD Superintendent from 1948 to 1955, overseeing a period of rapid population growth and school expansion in San Mateo County. Menlo-Atherton High School opened in 1951, followed by Carlmont High School in 1953, Woodside High School in

1958, and Ravenswood High School in 1958, with additional expansions at existing campuses to accommodate student populations of roughly 2,500 each. School construction in the 1950s was largely funded by local bonds and state funds, and reflected the Modernist architectural trends of the era, including modular, finger-plan layouts with long, narrow classroom wings and open corridors. By the mid-to-late 1950s, cluster-plan layouts began to replace or supplement finger-plan designs, grouping classrooms around central buildings to improve material efficiency and use of space, though often requiring artificial lighting.

During the 1950s and 1960s, U.S. schools faced segregation and unequal funding, prompting California to create the State Commission on School Districts in 1954 and the U.S. Supreme Court to rule in *Brown v. Board of Education* that segregation was unconstitutional. In 1964, San Mateo County required school districts to unify within high school boundaries to address racial and socioeconomic disparities, and SUHSD formally acted to desegregate in 1971. Despite these efforts, enrollment imbalances persisted, particularly at Ravenswood High School, which was closed in 1976 with students bused to other campuses. San Carlos High School opened in 1960 and closed in 1980 due to declining enrollment, while Redwood High School opened as a continuation school. By 2025, SUHSD comprises four comprehensive high schools (Sequoia, Woodside, Carlmont, Menlo-Atherton), a charter school, a continuation high school, and a middle college, serving roughly 9,700 students, alongside additional charter and educational programs focused on science, technology, engineering, and mathematics (STEM). The district continues to prioritize diversity and inclusion under Superintendent Crystal Leach.

Carlmont High School

The site for Carlmont High School in Belmont was originally part of the Mezes Ranch and was purchased in 1944 by the Sequoia Union High School District from Isabel Bourdette, widow of early Belmont resident John W. Bourdette. Construction was delayed during World War II and did not begin until 1951, following the approval of a bond in 1949. Architect Frank Wynkoop was selected to design the school after agreeing to a lower commission than competitors. His plan followed the “finger-plan” model popular in postwar school design, featuring parallel classroom wings connected by covered corridors, clerestories for daylight, and brise soleil louvers for heat control.

Construction was plagued by delays caused by inflation, strikes, and flooding, with costs rising from $1.5 million to over $3 million by completion. Despite the setbacks, the campus opened in April 1953 with 1,481 students and was named “Carlmont,” combining “San Carlos” and “Belmont.” Reuben “Thor” Krogh served as the first principal, followed by Albert Terremere and later Ivan Griffin and William Craig.

During the 1950s, additional facilities were added, including a gymnasium, pool, and music building by Wynkoop, and shop buildings by local contractor Wilfred May. Landscape architect Allan Himes Reid oversaw site planning and drainage for the steep terrain. By the early 1960s, Carlmont High School facilities expanded further, including a small theater constructed in 1964.

The 1970s brought social change and tension as the district’s voluntary transfer program introduced racial integration, resulting in conflicts but ultimately leading to a more diverse student body. Budget cuts also hit during this decade, and Carlmont narrowly avoided closure in 1980. A remodel of the library followed in 1976.

Significant modernization occurred between 1994 and 1999, when new two-story classroom buildings replaced the original quad, a new entry plaza was constructed, and covered walkways and rooflines were altered. From 2003 onward, architectural firms such as DES Architects, Spencer Associates, Sally Swanson Architects, and West Miles Architects designed major remodels and additions, including the new auditorium, library, aquatic center, gym, and classroom wings.

Today, Carlmont High School remains a cornerstone of the Belmont–San Carlos community, blending its midcentury design roots with modern educational facilities and serving over 2,300 students.

Campus Architecture

The 42-acre Carlmont High School campus occupies a hillside setting within a residential neighborhood southwest of downtown Belmont and west of downtown San Carlos. The northern half of the campus, adjacent to Alameda de las Pulgas, is relatively flat and contains the school's athletic fields, sports facilities, and parking areas. Most academic and administrative buildings are located on the steeply sloped southern portion of the site. The long, linear classroom wings extend to the south and southwest, arranged along a northwest–southeast axis that generally parallels Alameda de las Pulgas.

To the east of the classroom wings are the gymnasium, locker rooms, and cafeteria, with the shop buildings and baseball field located beyond them to the southeast. The Performing Arts Center and attached music building are situated at the western edge of the campus. Open landscaped areas featuring lawns and shrubs are interspersed between the buildings, contributing to the campus's spacious character. The original classroom wings, constructed in the early 1950s, reflect characteristic Midcentury Modern school design. Numerous additions and alterations have been made since that time, most of which fall outside the historic period of significance.

Archival Search

A records search conducted at the Northwest Information Center (NWIC) and through the Built Environment Resource Directory identified 20 prior cultural resource studies within one mile of the project site. Nine cultural resources have been recorded within this radius that included six prehistoric and three historic period resources.

In addition to the record search, a review was conducted of Built Environment Resource Directory (BERD) which includes California State Historic Preservation Officer (SHPO) Determinations of eligibility, and the listings under the National Register Historic Places (NRHP) and the California Register of Historic Resources (CRHR).

Site Surveys

An archaeological pedestrian survey of the project site was conducted on April 8, 2025, covering 100 percent of the area. Surface visibility was approximately 50 percent, and ground disturbances from construction, grading, and paving were extensive. No archaeological cultural resources of any kind (including prehistoric or historic-period archaeological sites or isolates)

were identified during the field survey. The high level of surface disturbance indicated a low potential for significant buried archaeological resources.

In addition, a survey of the built environment was conducted on April 8, 2025 to inspect the campus buildings and document the existing setting.

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Carlmont High School was evaluated for eligibility for listing on the NRHP and the CRHR under all applicable criteria. The evaluation concluded that the campus does not meet the requirements for listing:

- Criterion A/1 (Event): Carlmont High School is not associated with events that have made a significant contribution to broad patterns of history. While the school reflects the development of the Belmont and San Carlos communities during the mid-twentieth century and the postwar residential expansion, it was one of many schools built during this period of regional growth. Research indicates that the property does not possess significance within this or any other historic context.

- Criterion B/2 (Person): Carlmont High School is not associated with the lives of individuals significant in history. Research has not identified any staff members who achieved notable professional accomplishments while at the school, nor any individuals connected to the campus who had a lasting impact on local history. Additionally, schools generally have limited potential for direct association with historically significant persons.

- Criterion C/3 (Design/Architecture): Carlmont High School is not eligible for listing based on design, architecture, or engineering. While the campus was designed by Frank Wynkoop, a prominent architect known for innovative daylighting in schools, Carlmont was constructed a decade after his pioneering work and did not introduce new design techniques or receive professional recognition. The campus exhibits a decentralized circulation, lacks a visible primary entrance, and has limited relationship to the street, making it less approachable than Wynkoop's earlier schools.

  Substantial additions and alterations since the original 1951–1954 construction have further compromised the integrity of the campus. Only about half of the buildings retain the original finger-plan layout and architectural character, while post-1990 buildings are incompatible in massing, materials, and style, obscuring key architectural features. For these reasons, Carlmont High School is not considered a significant example of Wynkoop's work or of postwar Modernist school architecture and is not eligible for listing on the NRHP or CRHR.

- Criterion D/4 (Information Potential): In rare cases, buildings can provide important information about historic construction materials or technologies, qualifying them under Criterion D/4/d. Carlmont High School, however, represents well-documented and widely understood construction types and does not appear to offer unique or significant information in this regard.

Based on these findings, Carlmont High School is not eligible for listing on the NRHP or CRHR and is not considered a historical resource under CEQA. All project construction and staging

would occur within the boundary of the project site where no historical resources are present. Therefore, the proposed project would have no impact on historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

No archaeological resources, including prehistoric or historic-period materials, were identified during the records search or field survey of the project site. The site has experienced substantial prior disturbance, which reduces the likelihood of encountering intact archaeological deposits. However, ground-disturbing activities associated with the proposed project could potentially uncover previously unknown buried deposits. If construction or excavation exposes prehistoric or historic-period cultural materials, including artifacts, or structural features, this would be a potentially significant impact. Implementation of **Mitigation Measures CR-1a - Worker's Environmental Awareness Program and CR-1b - Unanticipated Archaeological Resources**, which would require providing an awareness training of all construction personnel and halting work in the event of unanticipated discovery of archaeological resources. Implementation of **Mitigation Measures CR-1a and CR-1b** would reduce this project impact to a **less-than-significant** level.

Mitigation Measure CR-1a: **Worker's Environmental Awareness Program**

The Sequoia Union High School District shall retain an archaeologist who meets or exceeds the Secretary of Interior's Professional Qualification Standards for archaeology to conduct a Worker's Environmental Awareness Program (WEAP) training for all construction personnel on archaeological sensitivity prior to the commencement of any ground-disturbing activities. The WEAP training shall include a description of the types of cultural material that may be encountered, cultural sensitivity issues, the regulatory environment, and the proper protocol for treatment of the materials in the event of a find.

Mitigation Measure CR-1b: Unanticipated Archaeological Resources

In the event that archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall be halted and the contractor must notify the Sequoia Union High School District, who will retain an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology, to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, under the direction of the Sequoia Union High School District, the archaeologist shall determine whether additional work, such as data recovery excavation, is warranted to mitigate any significant impacts to archaeological resources

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

No human remains were identified during the records search or field survey. In addition, the Sacred Lands File search with the Native American Heritage Commission (NAHC) returned negative results. However, it is still possible that buried human remains could exist at the project site and remain undiscovered. Ground-disturbing construction activities could inadvertently encounter such remains, which would constitute a significant impact. The project would implement Mitigation Measure CR-2: Avoid Impact to Human Remains, which requires halting

construction or excavation in the vicinity of discovered human remains and notifying the County Coroner. **Mitigation Measure CR-2** also outlines procedures in compliance with applicable federal and state regulations in the event of an unexpected discovery. With implementation of **Mitigation Measure CR-2**, potential project impact on human remains would be reduced to a ***less-than-significant*** level.

Mitigation Measure CR-2: Avoid Impact to Human Remains

As described therein, if human remains are uncovered during future ground-disturbing activities, the Sequoia Union High School District will halt potentially damaging excavation in the area of the burial and notify the County Coroner and a professional archaeologist, to determine the nature of the remains. The coroner will be required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands. If the coroner determines that the remains are those of a Native American, they must contact the NAHC by phone within 24 hours of making that determination. Following the coroner's findings, the Sequoia Union High School District, an archaeologist, and the Most Likely Descendant designated by the Native American Heritage Commission will determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The Most Likely Descendant would have 48 hours to complete a site inspection and make recommendations after being granted access to the site. A range of possible treatments for the remains, including nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendants, or other culturally appropriate treatment may be discussed. The following is a list of site protection measures that shall be employed:

- Record the site with the NAHC and the appropriate Information Center
- Use an open-space or conservation zoning designation or easement
- Record a document with the county in which the property is located.

If the NAHC is unable to identify a Most Likely Descendant or the Most Likely Descendant fails to make a recommendation within 48 hours after being granted access to the site, the Native American human remains and associated grave goods shall be reburied with appropriate dignity at the project site in a location not subject to further subsurface disturbance.

6.6 Energy

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

6.6.1 Environmental Setting

According to the California Energy Commission, statewide energy consumption in 2023 totaled approximately 276,213 gigawatt hours (GWh) of electricity[13] and 11,655 million therms of natural gas.[14] During the same year, San Mateo County represented approximately 1.5 percent of California total electricity use and 1.8 percent of natural gas consumption. Total electricity use in San Mateo County, during 2023, was 4,050 GWh, including 2,433 GWh of consumption for non-residential land uses.[15] Natural gas consumption countywide was 210.9 million therms in 2023, including 92.21 million therms from non-residential uses.

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Nonrenewable energy would be consumed during project construction. Energy use would occur primarily through (1) indirect energy associated with the production of construction materials (e.g., the energy required to manufacture concrete), (2) direct fuel use by construction equipment and vehicles, and (3) gasoline and diesel consumption from worker commutes and vendor trips. This energy demand during construction would be temporary. All construction equipment and heavy-duty trucks would be required to comply with applicable regulations, including Title 13, Article 4.9, Chapter 9, Section 2449 of the California Code of Regulations, which restricts idling to five minutes or less, thereby reducing unnecessary fuel consumption. Contractors would also be incentivized to minimize fuel, water, and energy use as a cost-saving measure. The project does not involve unusual features that would require the use of equipment less energy-efficient than that typically used at similar construction sites.

In the long term, the proposed project would not increase the number of students or employees at the site and, therefore, would not result in higher overall energy demand under the FMP. As

[13] California Energy Commission. 2025. Electricity Consumption. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-0. Accessed August 28, 2025.
[14] California Energy Commission. 2025. Natural Gas Consumption. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1. Accessed August 28, 2025.
[15] California Energy Commission. 2025. Natural Gas Consumption. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1. Accessed August 28, 2025.

required, all public school projects undergo plan review by the Division of the State Architect (DSA) and must demonstrate compliance with energy efficiency standards established by both the DSA and the California Energy Commission (CEC). In addition, the project would incorporate photovoltaic (solar) panels on select building rooftops and new shade structures, both to offset increased cooling needs and to advance the District's sustainability objectives. Accordingly, the project would not lead to wasteful, inefficient, or unnecessary energy consumption during either construction or operation, nor would it conflict with applicable plans or policies related to renewable energy or energy efficiency. Therefore, the project would have a ***less-than-significant*** impact on energy resources.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

State plans for renewable energy and energy efficiency include California's Renewables Portfolio Standard Program (as revised by Senate Bill 100) and the California Energy Efficiency Strategic Plan. The California Renewables Portfolio Standard (RPS) Program requires utilities to procure an increasing percentage of electricity from renewable sources, reaching 60 percent by 2030 and 100 percent zero-carbon electricity by 2045. While the RPS does not directly mandate actions for schools, the electricity supplied to schools by investor-owned utilities or community choice aggregators is subject to these requirements. Consequently, the proposed project would indirectly use electricity that contributes to California's renewable energy targets. In addition, the project includes the installation of photovoltaic (solar) panels on selected rooftops, which would further reduce reliance on conventional energy sources and support the District's sustainability goals.

The California Energy Efficiency Strategic Plan (CEESP) provides a statewide framework to promote cost-effective energy efficiency and reduce greenhouse gas emissions in buildings, including public schools. The proposed project would comply with applicable energy efficiency requirements under Title 24, Part 6 of the California Energy Code, consistent with the CEESP's goals. By incorporating these energy-efficient and renewable energy features, the project supports the state's energy conservation objectives, minimizes operational energy demand, and aligns with long-term sustainability goals

As described above, construction activities under the project would use construction equipment and vehicles that would comply with federal and state standards for fuel efficiency. In addition, as described above under criterion a), the proposed project activities would not result in an inefficient or wasteful consumption of energy resources. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency and there would be ***no impact.***

6.7 Geology and Soils

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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 California Geological Survey Special Publication 42.)	☐	☐	☒	☐
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv. Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1- B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

6.7.1 Existing Setting

The following information is based in part on geotechnical reports prepared for the proposed new classroom building and the baseball field at the project site.[16]

[16] Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. Baseball Field Improvement Project. Carlmont High School. September.
Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. South Campus Increment 2 – Three-Story Classroom Building Project. Carlmont High School. March.

Geological Setting

Regional Geological Setting

The Carlmont High School campus is located in the lowermost easterly foothills of the Santa Cruz Mountains. The project site is primarily underlain by Jurassic- and Cretaceous-age Franciscan Complex rocks, including sandstone, conglomerate, and greenstone, with lower elevations overlain by older alluvium. The northern and western portions of the site are covered by Holocene artificial fill, while the remainder is underlain by Holocene slope wash, ravine fill, and colluvium, consisting of unconsolidated to moderately consolidated sand, silt, clay, and rock fragments. Exploratory borings encountered Franciscan sandstone beneath these surficial deposits.

Local Geology

At the Carlmont High School site, the northern and western portions are underlain by Holocene-age artificial fill, consisting of poorly to well-consolidated gravel, sand, silt, and rock fragments. The remainder of the site is covered by Holocene slope wash, ravine fill, and colluvium, composed of unconsolidated to moderately consolidated sand, silt, clay, and rock fragments deposited by slow downslope movement of weathered rock and soil. Beneath these surficial deposits, exploratory borings encountered sandstone of the Franciscan Complex.

Seismicity

The Carlmont High School campus is located in one of the most seismically active regions of the United States. Multiple major faults are nearby, including the San Andreas, Hayward, Calaveras, San Gregorio, Monta Vista-Shannon, and Serra faults, as well as several concealed Quaternary faults. Historic earthquakes in the region have ranged from magnitude 5.0 to over 8.0, including the 1906 San Francisco and 1989 Loma Prieta events. Probabilistic seismic hazard models indicate a high likelihood of moderate to major earthquakes in the Bay Area over the next several decades. Consequently, structures and improvements at the campus are expected to experience strong ground shaking during their lifetime.

Soils

Subsurface investigation of the Carlmont High School site found that the north and west portions are underlain by 7.5 to 12 feet of undocumented fill soils, including medium-dense to dense clay-gravel-sand and silt-gravel-sand mixtures, clayey sand, silty sand, and stiff to very stiff sandy clay, overlying stiff to hard sandy clay, sandy silt, and silty clay to depths of 12 to 21.5 feet, with very dense Franciscan Complex sandstone beneath. The east and south portions of the project site are generally underlain by one to three feet of medium-dense silty sand and clayey sand, overlying very dense Franciscan sandstone to the maximum explored depth of 9 feet.

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 California Geological Survey Special Publication 42.)

The project site is not within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults are known to traverse the site. The site is approximately 2.4 miles northeast of the San Andreas Fault and 4.9 miles northwest of the Monte Vista-Shannon Fault. Neither of these faults extends beneath the campus. Consequently, the likelihood of surface rupture at the project site is low. Given the distances to these faults and the absence of known active faults on or near the site, the proposed project would not result in adverse effects related to an active or known fault. This impact would be ***less than significant.***

ii. Strong seismic ground shaking?

Occurrence of moderate to severe earthquake within the project area could result in strong ground shaking at the project site. The Working Group on California Earthquake Probabilities estimates the 30-year probability for a magnitude 6.7 or greater earthquake to occur in the San Francisco region at approximately 72 percent considering the known active seismic sources. New buildings at the project site would be designed and constructed in accordance with the recommendations provided in the project-specific geotechnical reports. These recommendations typically address structural foundations, site preparation, soil improvement measures (if required), and design parameters to reduce risks associated with seismic ground shaking. Implementation of these measures would ensure that the project incorporates appropriate engineering practices to withstand anticipated seismic forces.

In addition, the proposed project would be required to comply with the most recent version of the California Building Standards Code (Title 24, California Code of Regulations), which incorporates seismic design criteria consistent with the latest engineering standards for the Bay Area's seismic setting. DSA review and approval would further ensure that construction plans adhere to both the geotechnical report recommendations and applicable state and local seismic safety regulations.

Through compliance with these requirements and adherence to site-specific geotechnical measures, the potential risk of injury, structural damage, or loss due to strong ground shaking would be reduced to levels considered *less than significant*.

iii. Seismic-related ground failure, including liquefaction?

Soil liquefaction is a process in which saturated soils temporarily lose strength and stiffness as a result of increased pore water pressure generated during seismic shaking or other cyclic loading. This loss of strength can cause the soil to behave like a liquid, reducing its ability to support structures. Loose, saturated, fine-grained sands and non-plastic silts are generally the most susceptible to liquefaction, although certain gravels, silts with low plasticity, and clays may also be vulnerable under specific conditions.

The project site is not located within a potential liquefaction hazard zone as mapped by the California Geological Survey. Subsurface exploration identified medium-dense to dense soils

underlain by very dense Franciscan Complex sandstone. Laboratory testing and analysis of site soils indicate that the limited fine-grained layers present do not meet the criteria for liquefaction susceptibility. Site-specific modeling confirmed that theoretical seismically induced liquefaction and dry soil settlement are negligible. Therefore, the potential for liquefaction or related ground settlement at the project site is considered low. In addition, the proposed FMP would comply with the California Building Code, Title 24, Part 2, Section 1803, which requires all new construction and ground-disturbing improvements to incorporate the design and construction recommendations identified in the project-specific geotechnical investigation into project plans and implement them during construction. Therefore, this impact would be considered *less than significant*.

iv. Landslides?

According to the California Geological Survey, the sloped areas surrounding the baseball field terrace are located within zones of required investigation for potential earthquake-induced landslides. Regional mapping and the California Geological Survey's Earthquake Zones of Required Investigation indicates that the project site lies within an area of moderate landslide susceptibility along its perimeters. However, more detailed mapping shows no documented landslides within or adjacent to the site, and the California Landslide Inventory Map similarly identifies no existing or historical landslides in the vicinity. Review of historical and recent aerial imagery, along with site reconnaissance, revealed no visible evidence of past or active landsliding on or near the project site. [17] In compliance with the California Building Code, Title 24, Part 2, Section 1803, all new construction and ground-disturbing improvements would incorporate the design and construction recommendations identified in the project-specific geotechnical investigation into project plans and implement them during construction. Therefore, project implementation would have ***a less-than-significant*** related to landslide hazards.

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

Soil erosion is the process by which soil particles are detached and transported by wind or water. The rate and extent of erosion depend on factors such as soil type, structure, topography, vegetation cover, and human disturbance. Fine-grained soils, such as silts, are generally more prone to erosion, while coarser soils, such as sands, are less vulnerable. Erosion is most likely to occur on exposed or disturbed slopes, particularly where grading or cut-and-fill activities have reduced natural stabilization provided by vegetation.

The project would involve earthmoving activities during the construction of the new buildings, installation of utilities, and improvements to the baseball field.The potential exists for stormwater runoff and erosion to occur during construction activities, which would expose soils to erosive forces and could transport sediment into local drainages, such as the v-ditch located near the baseball field. This would degrade water quality and result in siltation to local waterways. Intense rainfall and associated stormwater runoff could result in short periods of sheet erosion within areas of exposed or stockpiled soils. If uncontrolled, these soil materials could cause sedimentation of downstream surface water bodies.

[17] Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. Baseball Field Improvement Project. Carlmont High School. September.

The California State Water Resources Control Board regulates stormwater discharges from construction sites. Projects that disturb one or more acres of soil are required to obtain coverage under the National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Construction Stormwater General Permit, Order 2022-0057-DWQ). Because the project would disturb more than 1 acre of land, the project would require coverage under the Construction Stormwater General Permit. To comply with the Construction Stormwater General Permit, the District would require the contractor to prepare a stormwater pollution prevention plan (SWPPP) and implement erosion and sedimentation best management practices to reduce construction-related erosion at the project site. These best management practices may include measures such as use of straw wattles to filter stormwater runoff, sandbags for sediment control and diverting water, silt fencing to retain soil, and covering stockpiles to control erosion and sedimentation during construction and prevent discharge of soils into stormwater runoff. These measures would minimize erosion and transport of sediment to off-site drainages.

Because the project would comply with the Construction Stormwater General Permit and would implement best management practices to prevent construction-related erosion and sediment transport, the project's impact related to substantial soil erosion would be ***less than significant***.

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?

As described above, the potential project impacts related to landslide and liquefaction would not be significant. Soil conditions at the project site near the baseball field were reported to be relatively dense with no shallow groundwater. Therefore, the potential for lateral spreading at the project site is unlikely. As noted above, the proposed project would comply with the California Building Code, Title 24, Part 2, Section 1803, requiring implementing recommendations identified in the project-specific geotechnical investigation into project plans for all new construction and ground-disturbing improvements. Therefore, potential project impact related to unstable geologic unit or soil is ***less than significant***.

d) Be located on expansive soil, as defined in Table 18-1- B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?

Expansive soils are characterized by their tendency to undergo volume changes with fluctuations in moisture content. When moisture increases, clay minerals within the soil absorb water and swell; when moisture decreases, the soils shrink. These expansion and contraction cycles can cause movement of the ground surface, which may in turn result in cracking, settlement, or heaving of foundations, pavements, and other structures built on such soils.

Soils near the baseball field were found to have low to moderate expansion potential. To avoid risks associated with expansive soils, all proposed new construction would be based on a project- and site-specific geotechnical report which is required to be reviewed by DSA for approval of school facilities. The report recommendations would address any soil and or foundation design or construction requirements. Therefore, the impact is considered ***less than significant***.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

The project would connect to the existing sewer system; There would be no use of septic tanks or alternative onsite wastewater disposal systems; therefore, the project would have ***no impact*** related to septic tanks or alternative waste water disposal systems.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources are the fossilized remains, traces, or imprints of prehistoric plants and animals preserved in geologic strata. These resources are considered nonrenewable scientific resources that provide valuable information about the history of life on Earth, ancient ecosystems, and long-term evolutionary processes. Paleontological resources can include fossilized bones, shells, leaf impressions, wood, microfossils, and invertebrate and vertebrate remains.

In California, paleontological resources are generally associated with sedimentary rock formations and unconsolidated deposits of Quaternary age and older. Within the San Francisco Bay Area, fossil-bearing formations include marine and non-marine sedimentary units that have yielded scientifically significant invertebrate, vertebrate, and plant fossils.

Ground disturbance associated with project construction would be largely confined to previously disturbed areas. Excavation for the new buildings is not expected to extend beyond a depth of approximately six feet, and pile foundations would not be required. Therefore, the likelihood of encountering paleontological resources during construction is considered low. Nevertheless, if such resources were unexpectedly discovered, they could be inadvertently damaged or destroyed, which would constitute a potentially significant impact. To address this, Mitigation Measure GEO-1 requires the implementation of discovery procedures in the event that paleontological resources are encountered. A qualified paleontologist would be retained to evaluate the find and recommend appropriate measures specific to the resource to ensure its protection. Therefore, project impact on paleontological resources would be ***less than significant with mitigation***.

Mitigation Measure GEO-1: Implement Appropriate Measures in Case of Inadvertent Discovery of Paleontological Resources

Prior to the start of ground-disturbing activities, the Sequoia Union High School District shall retain a qualified paleontologist, as defined by the Society of Vertebrate Paleontology (SVP), to provide training for construction personnel engaged in earthmoving activities. The training shall include information on the potential to encounter fossils, the types of fossils that may be identified during construction, and the appropriate procedures to follow if paleontological resources are discovered.

If paleontological resources are encountered during construction, work in the immediate area shall be halted, and the contractor shall notify the Sequoia Union High School District immediately. No further ground disturbance shall occur in the vicinity of the discovery until the resource has been evaluated by the qualified paleontologist. In coordination with the District, the paleontologist shall prepare and implement a recovery plan consistent with SVP standards to ensure the appropriate recovery, treatment, and curation of the resource. The

District shall review the recovery plan, determine which recommendations are feasible, and ensure that all required measures are implemented before construction resumes in the affected area.

6.8 Greenhouse Gas Emissions

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

6.8.1 Environmental Setting

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and will continue to contribute to global climate change and its associated environmental impacts. For this reason, the analysis of the proposed project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions and this section does not include an individual project-specific impact statement.

According to the Air District, construction represents a very small portion of a project's lifetime GHG emissions." The Air District's GHG "thresholds for land use project are designed to address operational GHG emissions which represent the vast majority of project GHG emissions." [18]

The Air District thresholds include a performance-based threshold; if a project meets all of the following criteria, the project would result in a less than significant GHG impact.[19]

- Project does not include natural gas and would not result in wasteful, inefficient, or unnecessary energy use;
- Project would result in vehicle miles traveled (VMT) per capita that is 15 percent below the regional average and meet the CALGreen Tier 2 off-street electric vehicle requirement.

18 Bay Area Air Quality Management District, CEQA Thresholds and Guidelines Update. Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: September 25, 2025.

19 A project need only demonstrate compliance with one of the thresholds (consistency with a GHG reduction strategy or performance criteria) to find that the project's GHG emissions are less than significant.

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Project operations would rely fully on electricity for energy supply and would not require natural gas. The proposed project would have access to existing utilities and transportation infrastructure, eliminating the need for any utility extension, transportation infrastructure, or energy use associated with such extensions to meet the project's demands. In addition, the proposed FMP assumes no increase in student enrollment, therefore project operation is not anticipated to generate new vehicle traffic or constitute an increase in VMT, as discussed in **Section 6.17 – Transportation**. Therefore, the proposed project would be consistent with the Air District's recommended design features and transportation performance standards. GHG emissions attributable to the proposed project would not result in a cumulatively considerable contribution to the significant cumulative impact of climate change and this impact would be ***less than significant***.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

In California, energy consumption in buildings is regulated by California Code of Regulations, Title 24. Title 24 includes standards that regulate energy consumption for the heating, cooling, ventilation, and lighting of residential and nonresidential buildings. The proposed project would be required to comply with the latest standards of Title 24 and the CALGreen Code. Therefore, this impact would be ***less than significant***.

6.9 Hazards and Hazardous Materials

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 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?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

6.9.1 Environmental Setting

The site was developed as a school in the early 1950s. A review of the California Department of Toxic Substances Control's (DTSC) EnviroStor database indicates the status of the project site as inactive (Inactive-Withdrawn.)[20] The DTSC status dates back from 2010 when the District was planning to construct a music building. As part of this project, the District prepared a Phase I Environmental Site Assessment (ESA) on February 5, 2009. The Phase I ESA concluded that no hazardous materials have been reported in the site vicinity. However, the project site, which have been used historically for agricultural purposes, was found to have the potential presence of residual pesticide concentrations in the soil.

[20] DTSC. 2025. https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60001056. Accessed: October 5, 2025.

The project site is identified on the State Water Resources Control Board's GeoTracker database as Complete-Case Closed.[21] The case was closed on January 28, 2000, following completion of site investigation and remedial activities associated with the removal of one 6,000-gallon and one 1,750-gallon underground fuel storage tank in December 1989. The closure letter, issued by the San Mateo County Public Health and Environmental Protection Division, indicated that no further action related to the underground fuel release was required.[22]

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction. The proposed project would include construction of new buildings, renovation of existing buildings, and associated infrastructure and landscaping improvements. Construction activities of new buildings would involve site preparation that would include demolition, grading, and staging of construction equipment and trailers, among other site preparation activities in the zoned areas planned for construction. Additionally, construction of new buildings would include the installation of new utilities, including water, sewer, and electrical services. Other construction activities would include landscape and pathways, stormwater management control, and the installation of lighting. Proposed renovations would be mostly to the interior of existing buildings. Renovation materials and equipment would be stored on campus in fenced locations in proximity of the proposed renovation activities.

Construction activities, including renovations to existing buildings, would require the use and transport of limited quantities of hazardous materials such as fuels and oils, solvents and cleaning solutions, paint and thinners, and other common construction materials. These materials could be released during transport, use, or disposal and could cause a hazard for the public. However, the District would require the contractor to implement best management practices, including hazardous materials management measures, which would reduce short-term construction impacts pertaining to the transport, use, and disposal of hazardous materials.

The contractor would be required to comply with Occupational Health and Safety Administration (OSHA) and California Division of Occupational Health and Safety (Cal/OSHA) health and safety requirements, all of which would be specified in the construction contracts. These regulations are effective in reducing potential risks to workers by requiring the contractor to adhere to safety standards and provide safety training to workers. In addition, hazardous materials must be transported to and from the project site in accordance with the Resource Conservation and Recovery Act and U.S. Department of Transportation regulations and disposed of in accordance with the Resource Conservation and Recovery Act at a licensed facility that is permitted to accept the waste. These regulations provide a framework for controlling hazardous waste from cradle to grave, ensuring the safe transport, use, and disposal of hazardous materials during construction. These regulations govern record-keeping of all aspects of the hazardous materials lifecycle, mitigating and cleaning up existing contamination and hazardous materials spills, describing requirements for emergency response, and ensuring that workers are trained to handle hazardous materials and respond appropriately to hazardous

[21] State Water Resource Control Board. Geotracker. https://geotracker.waterboards.ca.gov/profile_report?global_id=T0608100106. Accessed October 11, 2025.
[22] San Mateo County Public Health and Environmental Protection Division. 2000. Letter from Brian J. Zarnora, Environmental Health and Public Health Director. January 28.

materials incidents. Because compliance with existing regulations is mandatory, construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, the proposed project would be required to comply with the District SCM-5 for hazardous materials, which requires the implementation of best management practices for preventing releases of hazardous materials used during construction, including proper storage, spill prevention, and immediate containment and cleanup. Any reportable spills or releases would be promptly reported to the appropriate regulatory agencies. As noted below in **Section 6.10 - Hydrology and Water Quality**, as part of the California State Water Resources Control Board General Construction Permit, the proposed project would be required to prepare and submit a construction site-specific SWPPP. The SWPPP would include a description of appropriate BMPs to minimize the discharge of pollutants from the project site.

Once constructed, the proposed project would continue to use the same types of common hazardous materials currently used on campus, such as cleaning products, disinfectants, and solvents. These products are widely used in school settings, are properly labeled with handling instructions, and are managed in accordance with standard District procedures. Their use would be similar to existing conditions and would not substantially increase the quantities handled onsite. Because these materials are typically consumed during normal use and generate minimal waste, their routine use, transport, and disposal would not pose new or increased hazards to the public or the environment.

Therefore, construction and operation of the proposed project would result in a ***less-than-significant*** impact related to the use, transport, or disposal of hazardous materials.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?

The proposed project would include demolition of existing buildings and structures at the project site, such as the classroom T-Wing building. Based on the classroom building's date of construction (1951-1955), some of the building materials may pre-date the 1970s ban on the use of asbestos-containing materials (ACMs) and lead-based paint (LBP).

The California Department of Toxic Substance Control (DTSC) considers asbestos hazardous and requires removal of ACMs prior to demolition or construction activities that could result in disturbance of these materials. ACMs must be removed in accordance with local and state regulations as well as air district, CAL/OSHA, and California Department of Health Services requirements. The California legislature vests the local air district, in this case the Air District, with the authority to regulate airborne pollutants, including ACMs, through both inspection and law enforcement. The air district is to be notified 10 days in advance of any proposed demolition or abatement work. Any disturbance of ACMs at the project site would be subject to the requirements of the air district Regulation 11, Rule 2, Hazardous Materials—Asbestos Demolition, Renovation, and Manufacturing. The local office of Cal/OSHA must also be notified of asbestos abatement. Asbestos abatement contractors must follow state regulations contained in the CCR Title 8, Section 1529 and Sections 341.6 through 341.14, when their work involves 100 gross square feet or more of asbestos-containing materials. Pursuant to California law, the District would comply with the requirements described above.

Additionally, demolition activities could result in LBP disturbance and must therefore comply with the Cal/OSHA lead in construction standard (CCR Title 8, Section 1532.1). This standard requires development and implementation of a lead compliance plan when materials containing lead are disturbed during construction. The plan must describe activities that could emit lead, methods that would be used to comply with the standard, safe work practices, and a plan to protect workers from exposure to lead during construction. Cal/OSHA would require 24-hour notification if more than 100 square feet of lead-containing material would be disturbed.

Based on mandatory compliance with existing regulatory requirements, the proposed project would not result in a significant hazard to the public or environment from asbestos or lead-based paint.

In addition, the proposed project would comply with the District SCM-5 for hazardous materials, which requires conducting appropriate environmental assessments, preparing and implementing a Hazardous Materials Management Plan when contaminants are identified, and ensuring that all hazardous materials are properly handled, treated, contained, or removed in accordance with applicable regulatory standards.

For the reasons discussed above, the proposed project would result in a ***less-than-significant*** impact with respect to the hazards associated with the accidental release of hazardous materials into the environment.

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

The project site is an existing high school and would continue to operate as such following project completion. As described under items (a) and (b), project construction would involve the temporary use of fuels, paints, solvents, and adhesives. During operation, the project would continue to intermittently use household cleaners, adhesives, and solvents for cleaning and maintenance. The transport, storage, and use of these materials are regulated under existing federal, state, and local requirements.

Construction of the proposed project would be in compliance with applicable state and local regulations, which would ensure that the project does not result in hazardous emissions or the improper handling of acutely hazardous materials or wastes. Therefore, this impact would be ***less than significant***.

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?

The project site is not listed as an active or open hazardous materials case on any state regulatory database. As noted above the DTSC EnviroStor database indicates the status of the project site as inactive (Inactive-Withdrawn.) The project site is identified on the State Water Resources Control Board's GeoTracker database as Complete-Case Closed. Therefore, the project site is not listed on an active hazardous materials and this impact would be ***less than significant***.

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?

The project site is not located within an airport land use plan and is not within two miles of a public or public-use airport. The nearest airport to the project site is San Carlos Airport, approximately 1.9 miles to the east-northeast. San Francisco International Airport is located approximately 8 miles to the northwest. All other Bay Area airports are located further from the project site. Because the project site is not within the influence area of an airport and is not subject to an airport land use plan, the proposed project would not expose people residing or working in the project area to safety hazards or excessive noise related to airport operations. Therefore, *no impact* would occur.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

All construction activities for the project would be fully contained within the project site, with no lane closures required on adjacent roadways. Access for emergency vehicles would be maintained at all times throughout the construction period. On a long-term basis, the project would not alter circulation patterns or roadways near the project site. Therefore, the proposed project would have ***no impact*** on emergency access and plans.

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

California Department of Forestry and Fire Prevention (CAL FIRE) identifies the site within a Local Responsibility Area with no Fire Hazard Severity Zone.[23] Fire protection at the project site is provided by the San Mateo Consolidated Fire Department that serves the communities of Belmont, Foster City, and San Mateo. The proposed project does not propose new structures within areas designated as high, very high, or extreme wildfire threat zones. The site is situated in an urbanized area with developed infrastructure, reducing the likelihood of direct exposure to wildfires. Project impact related to wildfire is discussed further in **Section 6.20 – Wildfire**. Therefore, the proposed development would not significantly expose people or structures to the risk of loss due to wildland fires. The impact is considered ***less than significant***.

[23] Cal Fire. 2025. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9. Accessed: October 10, 2025.

6.10 Hydrology and Water Quality

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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:				
i. Result in substantial on- or off-site erosion or siltation;	☐	☐	☒	☐
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?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

6.10.1 Environmental Setting

The Carlmont High School is at an approximate elevation of 270 feet above mean sea level and is generally flat.[24] The project site is located within the Belmont Creek watershed, which drains an area of approximately three square miles encompassing portions of the cities of Belmont, San Carlos, and unincorporated San Mateo County. The watershed flows generally from the western foothills of the Santa Cruz Mountains eastward toward the San Francisco Bay, and includes a network of creeks, drainages, and surface water features that support local hydrologic and ecological functions.[25]

[24] Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. Baseball Field Improvement Project. Carlmont High School. 1400 Alameda de las Pulgas, Belmont, California. September.
[25] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.

Belmont Creek, the primary drainage feature within the watershed, originates in the hills above Hallmark Drive on the eastern face of Pulgas Ridge. The creek flows east through Water Dog Lake, a small man-made reservoir that regulates flows from the upper watershed. Downstream of Water Dog Lake, Belmont Creek continues eastward, generally parallel to Ralston Avenue, before exiting the city near Harbor Boulevard. The creek then forms the boundary between the Harbor Industrial Area and the City of San Carlos, reenters Belmont east of Highway 101, and ultimately discharges to the San Francisco Bay through O'Neill Slough and Belmont Slough.

The project site lies on the southern portion of the watershed, where several small tributaries and storm drain channels convey runoff from the residential hillsides and developed areas along Alameda de las Pulgas and Carlmont Drive toward Belmont Creek. These tributaries are primarily culverted or channelized in this portion of the watershed. Local drainage is managed by the City of Belmont's stormwater system, which connects to regional conveyances discharging to Belmont Creek.

Downstream, O'Neill Slough connects to Belmont Slough and ultimately to San Francisco Bay, where freshwater inflows mix with tidal saltwater to create brackish estuarine conditions. These interconnected systems play an important role in flood management, stormwater conveyance, and habitat support in the lower watershed.

Groundwater

Groundwater was not encountered in the exploratory borings drilled near the baseball field to a maximum depth of 23 feet. However, groundwater was observed at approximately 3 feet below the ground surface in borings near the T-Wing. The shallowest groundwater encountered in the vicinity of the S-Wing was approximately 12.5 feet below the ground surface.[26]

Stormwater

Belmont's storm drainage system includes 28 miles of pipes and two pump stations. Four main drainage areas, Belmont Creek, Laurel Creek, O'Neil Slough, and Island Park Belmont Creek, collect about 80 percent of the city's storm runoff, with Belmont Creek handling roughly 60 percent.

Stormwater runoff generated within the project area is collected by the local municipal storm drain systems of the City of San Carlos and the City of Belmont. The drainage systems consist of curb inlets and underground pipelines. Storm drains within the City of Belmont are separate from the sanitary sewer system; therefore, water conveyed to these drains is not treated before being discharged into local creeks, lagoons, and ultimately the ocean. Belmont's stormwater program encompasses the maintenance and operation of storm drain infrastructure, implementation of stormwater pollution prevention measures, compliance with the National Pollutant Discharge Elimination System (NPDES) permit, and street sweeping activities.[27]

[26] Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation South Campus Increment-2-Three-Story Classroom Building Project. Carlmont High School. 1400 Alameda de las Pulgas, Belmont, California. March.
[27] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.

Flooding

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) categorize and rank areas that are susceptible to flooding. The project site is located in FEMA Flood Zone X, areas determined to have minimal flood hazard.[28]

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Construction. The proposed project could result in short-term water quality impacts during construction due to the potential for accidental releases of fuels or fluids from equipment, as well as increased sedimentation or erosion from grading activities. Because the proposed project would involve more than one acre of ground disturbance, as required in the District's SCM-6 for hydrology and water quality, it is subject to the California State Water Resources Control Board Construction General Permit, which requires preparation of a SWPPP. The SWPPP establishes stormwater management practices and serves as the framework for implementing construction BMPs to minimize potential impacts.

The SWPPP would include an erosion control plan to address erosion and sediment controls, tracking controls, non-stormwater management measures (e.g., dewatering, paving and grinding operations, illicit discharges), and source controls such as waste management and spill prevention.

Compliance with the Construction General Permit—including implementation of the SWPPP and associated BMPs—would reduce stormwater runoff volumes, flow rates, and pollutant loads generated by the project. As a result, the project would not violate water quality standards, discharge requirements, or otherwise substantially degrade surface or groundwater quality.

Operation. Runoff from any new impervious areas has the potential to carry pollutants including oils, grease, heavy metals, trash, and other urban contaminants into the storm drain system. To address these potential impacts, the project would be required to comply with post-construction stormwater quality requirements, including preparation and implementation of a Stormwater Control Plan (SCP) consistent with the Regional Quality Control Board Municipal Regional Stormwater Permit.

The SCP would incorporate site design features, source control measures, and stormwater treatment facilities such as bioretention areas, infiltration systems, or vegetated swales to capture and treat stormwater prior to discharge. These measures are designed to reduce runoff volumes, improve water quality, and maintain compliance with applicable water quality standards.

Through adherence to these requirements and ongoing maintenance of stormwater treatment facilities, operation of the project would not result in violations of water quality standards or

[28] FEMA. 2023.National Flood Hazard Layer FIRMette. City of Belmont. 06081C0168F, effective on 7/16/2015. https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/j88e27f9778684b138ff095d65f944fb3/scratch/FIRMETTE_504d9463-e9fa-4839-bac8-aeec2324d84e.pdf. Accessed October 11, 2025.

waste discharge requirements, nor would it substantially degrade surface or groundwater quality.

Therefore, water quality impacts during project construction or operation would be ***less than significant***.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Implementation of the proposed project would result in a marginal increase in impervious surface area compared to existing conditions. This increase would primarily result from the replacement of existing structures and the addition of relatively small new buildings. Given the limited scale of these changes, the project would not substantially alter infiltration of runoff into underlying soils or adversely affect groundwater recharge. The project site is not located within a designated groundwater recharge area, and no groundwater extraction would occur as part of project operations. Accordingly, the project would not require new or additional groundwater supplies and would not conflict with existing groundwater management programs. Impacts related to groundwater recharge and supply would therefore be ***less than significant***.

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:

i. Result in substantial on- or off-site erosion or siltation;

Construction, grading, excavation, and other ground-disturbing activities could temporarily exposure bare soils, which could result in soil erosion. However, as described above, construction activities would be subject to the requirements of the Statewide Construction General Permit. Compliance with this permit requires preparation and implementation of a project-specific SWPPP, including BMPs to minimize erosion, control sediment, and prevent polluted stormwater discharges. Implementation of these measures would reduce potential construction-related water quality impacts to a ***less-than-significant*** level.

On the long term, this incremental increase in impervious surfaces would not be expected to cause on-site erosion or siltation following construction. The project incorporates site improvements and stormwater infrastructure upgrades, including subsurface drainage improvements and landscaped open spaces, which would reduce volumes and rates of stormwater runoff and remove stormwater pollutants before discharge. These measures would also reduce the potential for off-site erosion or siltation impacts to local receiving waters. This impact would be ***less than significant***.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

The proposed project would include demolition of existing facilities, construction of new buildings, renovation of existing structures, and associated site improvements. These activities would result in a marginal increase in impervious surfaces compared to existing conditions. In addition, much of the new construction would occur in areas that are already developed with buildings or paved surfaces, and therefore the increase in overall impervious area would be minimal.

As stated above, on-site treatment controls would be implemented to reduce stormwater flows and thus reduce the potential for any off-site flooding. In addition, the project design would include features that minimize surface water runoff (e.g., permeable pavers, drought tolerant landscaping, and efficient water irrigation). These features would help to mimic natural hydrologic conditions which can help reduce sheet flow and the velocity of stormwater and prevent soil erosion. Impacts would be ***less than significant***.

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

Implementation of the proposed project is not anticipated to alter existing drainage patterns on the campus. Grading and site preparation would be limited to the footprints of the proposed facilities and improvements, and construction would not modify the overall function of the campus drainage system. Although these improvements would result in a slight net increase in impervious surface area across the campus, the increase would be marginal because much of the new development would occur in areas already developed with buildings or paved surfaces.

Improvements to the baseball field would not increase the impervious surface. Therefore, runoff volumes and rates from the improved field would not exceed existing conditions.

In addition, stormwater from the baseball field would be in compliance with applicable post-construction stormwater management requirements. As discussed under Section **6.4 – Biological Resources**, the District would comply with the State Water Resources Control Board's MRP, which requires incorporating reduction in surface water drainage pollution runoff and establishing stormwater control measures that include LID techniques, such as infiltration, bio-retention, and flow control, to minimize pollutant discharge and eliminate non-stormwater flows. Therefore, the proposed FMP improvements would not result in changes to on-site or off-site drainage patterns, nor would they increase the potential for erosion, siltation, or other water quality impacts. The project impact related to drainage and water quality would be ***less than significant***.

iv. Impede or redirect flood flows?

As noted above, the project site is not located within a designated flood hazard zone, as identified by the FEMA Flood Insurance Rate Maps. In addition, proposed buildings and site improvements would not involve features that would impede or redirect existing flood flows. Accordingly, the project would not impede or redirect flood flows, and ***no impact*** would occur under this criterion.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Seismically-induced ocean waves are caused by displacement of the sea floor by a submarine earthquake and are called tsunamis. Seiches are waves produced in a confined body of water such as a lake or reservoir by earthquake ground shaking or landsliding. Seiches are possible at reservoir, lake or pond sites. There are no large bodies of water near the project site. The project site is approximately 2.7 miles southwest of the San Francisco Bay shoreline tsunami zone and is also at least approximately 185 feet above mean sea level. Therefore, the project is not at risk to release pollutants in the event of a seiche or tsunami since there is no nearby

waterbody. The proposed project would have ***no impact*** related to flood hazard, tsunami, or seiche zones.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As discussed above, during construction, the project would implement BMPs identified in the SWPPP. In addition, the proposed project would not impede sustainable groundwater management as the project would not utilize groundwater or interfere with groundwater recharge. Therefore, construction and operation of the proposed project would have ***no impact*** on the implementation of a water quality control plan or sustainable groundwater management plan.

6.11 Land Use and Planning

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

6.11.1 Environmental Setting

The major portion of the project site is located in the City of Belmont and the southeastern portion is located within the limits of the City of San Carlos in San Mateo County. The site is an existing high school campus originally constructed in the mid-20th century and has been subject to various additions and renovations over time. Surrounding land uses include multi-family buildings to the northwest and single-home residences to the north and northeast. Tierra Linda Middle School and Crossing Community Church are located to the northeast across Alameda de Las Pulgas. Wonder Years Preschool is located to the east, along Cranfield Avenue. The surrounding area to the west and south includes multiple apartment complexes, additional single-family homes, and open space. The Carlmont High School is designated as Public/Community Facilities under the City of Belmont's General Plan.

a) Physically divide an established community?

The proposed project would not physically divide an established community. All the proposed FMP improvements would occur within the campus and would not change existing roadways, sidewalks, circulation patterns, land uses, or any conditions outside the project site. Therefore, the project would not physically divide an established community. ***No impact*** would occur

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The District maintains jurisdiction over land use planning and development at the project site. All project improvements and construction activities would occur within the project site. The proposed project would not alter existing land uses and would not modify the City of Belmont General Plan land use designation. Accordingly, the project would maintain consistency with existing land use and zoning designations.

Project consistency with applicable plans and policies adopted to avoid or mitigate environmental effects is addressed throughout this Initial Study. The analysis incorporates best management practices and mitigation measures that would reduce potentially significant impacts to less-than-significant levels. Therefore, the proposed project would not result in significant environmental impacts due to conflicts with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating environmental effects. This impact would be ***less than significant***.

6.12 Mineral Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

6.12.1 Environmental Setting

Under the Surface Mining and Reclamation Act (SMARA), the State Mining and Geology Board (Board) may designate certain mineral deposits as being regionally significant to satisfy future needs. The Board's decision to designate an area is based on a classification report prepared by the California Geological Survey and on input from agencies and the public. The State Office of Mine Reclamation's list of mines regulated under the SMARA does not include any mines within the City.[29]

a) and b) 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, or a locally important mineral resource recovery site delineated on a local general plan ?

As noted above, there are no mines within the City of Belmont or its surrounding area listed on the SMARA-regulated mines. Therefore, no significant mineral resources have been identified within the project area, nor are there any active or planned mineral extraction operations in the vicinity.

Because the proposed project is located on an existing developed high school campus and does not overlap with any mineral resource zones or mineral extraction operations, implementation of the project would not result in the loss of availability of a known mineral resource or a locally important mineral resource recovery site. Therefore, the proposed project would have ***no impact*** on mineral resources.

[29] California Department of Conservation. Division of Mine Reclamation. 2025. Mines Online: https://maps.conservation.ca.gov/mol/index.html. Accessed: October 11, 2025.

6.13 Noise

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located 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?	☐	☐	☐	☒

6.13.1 Noise and Vibration Fundamentals

Noise may be defined as unwanted sound. Noise is usually objectionable because it is disturbing or annoying. The objectionable nature of sound could be caused by its pitch or its loudness. Pitch is the height or depth of a tone or sound, depending on the relative rapidity (frequency) of the vibrations by which it is produced. Higher-pitched signals sound louder to humans than sounds with a lower pitch. Loudness is the intensity of sound waves combined with the ear's reception characteristics. Intensity may be compared with the height of an ocean wave in that it is a measure of the amplitude of the sound wave.

In addition to pitch and loudness, several noise measurement scales are used to describe noise at a particular location. A decibel (dB) is a unit of measurement that indicates the relative amplitude of a sound. The zero on the decibel scale corresponds to the lowest sound level that the healthy, unimpaired human ear can detect. Sound levels in decibels are calculated logarithmically. An increase of 10 decibels represents a tenfold increase in acoustic energy, while 20 decibels is 100 times more intense, 30 decibels is 1,000 times more intense, etc. There is a relationship between the subjective noisiness or loudness of a sound and its intensity. Each 10 decibel increase in sound level is perceived as approximately a doubling of loudness over a fairly wide range of intensities. Technical terms are defined in **Table 7 - Definition of Acoustical Terms Used in this Report**.

There are several methods of characterizing sound. The most common in California is the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Representative outdoor and indoor noise levels in units of dBA are shown in **Table 8 - Typical Noise Levels in the Environment**.

TABLE 8 - DEFINITION OF ACOUSTICAL TERMS USED IN THIS REPORT

Term	Definition
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20 micro Pascals.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micro Pascals (or 20 micro Newtons per square meter), where 1 Pascal is the pressure resulting from a force of 1 Newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio of the sound pressure to a reference sound pressure (e.g., 20 micro Pascals). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency, Hz	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing ranges from 20 Hz to 20,000 Hz. Infrasonic sounds are below 20 Hz, and Ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level, dBA	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high frequency components of sound, mimicking the frequency response of the human ear and correlating well with subjective reactions to noise.
Equivalent Noise Level, Leq	The average A-weighted noise level during the measurement period.
Lmax, Lmin	The maximum and minimum A-weighted noise level during the measurement period.
L01, L10, L50, L90	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day/Night Noise Level, Ldn or DNL	The average A-weighted noise level during a 24-hour day, obtained after addition of 10 decibels to levels measured in the night between 10:00 pm and 7:00 am.
Community Noise Equivalent Level, CNEL	The average A-weighted noise level during a 24-hour day, obtained after the addition of 5 decibels in the evening from 7:00 pm to 10:00 pm and after the addition of 10 decibels to sound levels measured in the night between 10:00 pm and 7:00 am.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise that intrudes over the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, and time of occurrence, and tonal or informational content, as well as the prevailing ambient noise level.

Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be utilized. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events. This energy-equivalent sound/noise descriptor is called Leq. The most common averaging period is hourly, but Leq can describe any series of noise events of arbitrary duration.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about ±1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source. Close to the noise source, the models are accurate to within about plus or minus 1 to 2 dBA.

TABLE 9 - TYPICAL NOISE LEVELS IN THE ENVIRONMENT

Common Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock band
Jet fly-over at 1,000 feet		
	100	
Gas lawn mower at 3 feet	**95**	
	90	
Diesel truck at 50 feet at 50 mph		Food blender at 3 feet
	80	Garbage disposal at 3 feet
Noisy urban area, daytime		
Gas lawn mower, 100 feet	**70**	Vacuum cleaner at 10 feet
Commercial area		Normal speech at 3 feet
Heavy traffic at 300 feet	**60**	
		Large business office
Quiet urban daytime	**50**	Dishwasher in next room
Quiet urban nighttime	**40**	Theater, large conference room
Quiet suburban nighttime		
	30	Library
Quiet rural nighttime		Bedroom at night, concert hall
	20	
		Broadcast/recording studio
	10	
	0	

SOURCE: Technical Noise Supplement (TeNS), California Department of Transportation, September 2013.

Since sensitivity to noise increases during the evening and at night -- because excessive noise interferes with sleep -- 24-hour descriptors have been developed that incorporate artificial noise penalties applied to quiet-time noise events. The Community Noise Equivalent Level (CNEL) is a measure of cumulative noise exposure in a community, with a 5 dB penalty applied to evening (7:00 pm - 10:00 pm) noise levels and a 10 dB penalty applied to nocturnal (10:00 pm - 7:00 am) noise levels. The Day/Night Average Sound Level (DNL or Ldn) is essentially the same as CNEL, except that the evening time period is omitted and all occurrences during this three-hour period are grouped into the daytime period.

Fundamentals of Groundborne Vibration

Ground vibration consists of rapidly fluctuating motions or waves with an average motion of zero. Several different methods are typically used to quantify vibration amplitude. One method is the Peak Particle Velocity (PPV). The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. In this report, a PPV descriptor with units of mm/sec or in/sec is used to evaluate construction-generated vibration for building damage and human complaints. **Table 9 – Reaction of People and Damage to Buildings from Continuous or Frequent Intermittent Vibration Levels**, displays the reactions of people and the effects on buildings that continuous vibration levels produce.

The annoyance levels shown in **Table 9** should be interpreted with care, as vibration may be found annoying at much lower levels than those shown, depending on the level of activity or the individual's sensitivity. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibrations, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage.

Construction activities can cause vibration that varies in intensity depending on several factors. Pile driving and vibratory compaction equipment typically generate the highest construction-related groundborne vibration levels. Because of the impulsive nature of such activities, the PPV descriptor has been routinely used to measure and assess groundborne vibration, and almost exclusively to assess the potential of vibration to induce structural damage and the degree of annoyance to humans.

TABLE 10 - REACTION OF PEOPLE AND DAMAGE TO BUILDINGS FROM CONTINUOUS OR FREQUENT INTERMITTENT VIBRATION LEVELS

Velocity Level, PPV (in/sec)	Human Reaction	Effect on Buildings
0.01	Barely perceptible	No effect
0.04	Distinctly perceptible	Vibration unlikely to cause damage of any type to any structure
0.08	Distinctly perceptible to strongly perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected
0.1	Strongly perceptible	Threshold at which there is a risk of damage to fragile buildings with no risk of damage to most buildings
0.25	Strongly perceptible to severe	Threshold at which there is a risk of damage to historic and some old buildings.
0.3	Strongly perceptible to severe	Threshold at which there is a risk of damage to older residential structures
0.5	Severe - Vibrations considered unpleasant	Threshold at which there is a risk of damage to new residential and modern commercial/industrial structures

SOURCE:Transportation and Construction Vibration Guidance Manual, California Department of Transportation, April 2020.

structure and the potential to interfere with the enjoyment of life are evaluated against different vibration limits. Studies have shown that the threshold of perception for average persons is in the range of 0.008 to 0.012 in/sec PPV. Human perception of vibration varies among individuals and depends on the physical setting and the type of vibration. Persons exposed to elevated ambient vibration levels, such as those in an urban environment, may tolerate higher vibration levels.

Structural damage can be classified as cosmetic, such as minor cracking of building elements, or as threatening the integrity of the building. Safe vibration limits for assessing the potential for structural damage vary among researchers, and there is no general consensus on how much vibration may pose a threat to the structure. Construction-induced vibration that can be detrimental to the building is very rare and has been observed only in instances where the structure is in a high state of disrepair, and the construction activity occurs immediately adjacent to it.

The annoyance levels shown in Table 3 should be interpreted with care, as vibration may be found annoying at lower levels than those shown, depending on the level of activity or the individual's sensitivity. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibrations, such as a slight rattling of windows, doors, or stacked dishes. The rattling sound can give rise to exaggerated vibration complaints, even though there is very little risk of actual structural damage.

a) *Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or in other applicable local, state, or federal standards?*

Construction noise impacts depend on the noise generated by various equipment, the timing and duration of noise-producing activities, and the distance between construction sites and noise-sensitive areas. Construction noise impacts mainly occur when activities take place during noise-sensitive times of day (e.g., early morning, evening, or nighttime hours), when construction is near noise-sensitive land uses, or when construction lasts for extended periods.

As discussed in **Section 3.2.5, FMP Project Construction**, the proposed project would be required to comply with the District's Standard Construction Measures for controlling construction noise (SCM-7), which requires complying with the local noise ordinance. In compliance with the noise ordinances of the Cities of Belmont and San Carlos, the proposed project would limit outdoor construction activities to the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday, and 10:00 a.m. to 5:00 p.m. on Saturdays. No construction would occur on Sundays or holidays. In addition, also in compliance with SCM-7, the proposed project construction would implement the following best management practices.

- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Prohibit unnecessary idling of internal combustion engines.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.
- Locate construction staging areas at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be

implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

To calculate the noise levels resulting from the construction of the proposed project, the Federal Transit Administration's (FTA) noise thresholds are used in this analysis. The FTA limits daytime construction noise to 80 A-weighted decibels[30] (dBA) Equivalent continuous sound level[31] (Leq) at residential areas, 85 dBA Leq at commercial and office areas, and 90 dBA Leq at industrial areas.

Construction activities would require the use of typical construction equipment. This would include drill rigs, cranes, excavators, loaders, graders, compactors, concrete pumps, concrete trucks, dump trucks, delivery trucks, forklifts, scissor lifts, bobcats, and medium- and light-duty trucks. Typical hourly-average noise levels from school construction projects are around 75 to 89 dBA Leq, measured at a distance of 50 feet from the site during peak construction (e.g., when earth-moving equipment and impact tools are in use). Noise levels decrease by about 6 dBA for each doubling of the distance from the source to the receptor. Shielding by buildings or terrain often results in lower noise levels at distant receptors. Noise levels also drop when construction activities are moved indoors, as less heavy equipment is usually required.

The Federal Highway Administration's (FHWA) Roadway Construction Noise Model (RCNM) was used to calculate the maximum instantaneous and hourly-average noise levels generated by construction activities during each major phase. It assumes the two loudest pieces of equipment operate simultaneously, as recommended by the FTA for construction noise assessments. This model includes representative sound levels for common types of construction equipment and estimates of their usage factors, developed from extensive data collected during the construction of the Central Artery/Tunnel Project in Boston, Massachusetts (CA/T Project or "Big Dig"). The usage factors represent the percentage of time the equipment operates at full power. **Tables 8** and **9** provide the expected construction noise levels for N-1, the new T Wing building, while **Tables 10** and **11** do the same for N-2, the new terrace building. **Tables 12** and **13** summarize the noise levels for N-3, the new Admin/Student Support Building. **Tables 14** and **15** present the expected construction noise levels from S-1, Bleacher Expansion, New Press Box, and Main Street Improvements. **Tables 16** and **17** provide the noise levels for the S-2, New Campus Stadium Entrance and Field House, while **Tables 18** and **19** do the same for S-3, the New Auxiliary Field at the Baseball Field.[32]

As shown in **Tables 9, 11, 13, 15, 17,** and **19**, construction noise levels produced by the major improvements at Carlmont High School would remain at or below 80 dBA Leq at receptors near the various improvement sites. The predicted noise levels do not exceed the 80 dBA limit set by the FTA for residential receptors.

[30] A noise measurement adjusted to reflect how the human ear perceives sound.
[31] The average sound level over a specified period.
[32] Estimated construction noise levels of the Administration building, stadium expanded bleachers, and stadium entrance and field house were calculated to support the programmatic analysis. These calculations would be revised once more project details become available.

Since the proposed FMP construction activities would last about six months at each major construction site, occur within permitted hours, and most construction would not be close to receptors, any temporary noise increases resulting from project construction would have a ***less-than-significant*** impact.

TABLE 11 - CONSTRUCTION NOISE LEVELS AT 50 FEET (T-WING BUILDING)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L_{max})	Average Noise Level (L_{eq})
Demolition	Concrete/Industrial Saw (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)[a]	90 82 84/79	85
Site Preparation	Grader (1)[a] Tractor/Loader/Backhoe (1)[a]	85 84	84
Grading / Excavation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1)[a]	85 82 84	84
Trenching / Foundation	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	84 81	82
Building - Exterior	Crane (1) Forklift (2) Generator Set (2)[a, a]	81 75 81	81
Building – Interior / Architectural Coating	Air Compressor (1)[a]	78	74
Paving	Cement and Mortar Mixer (4)[a] Paver (1) Roller (1) Tractor/Loader/Backhoe (1)[a]	80 77 80 84	82

SOURCE: Illingworth & Rodkins, 2025.
NOTES: [a] Denotes the loudest pieces of construction equipment per phase.

TABLE 12 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (T-WING BUILDING)

Phase	Hourly Average Noise Levels[a], dBA L_{eq}			
	Source (50 ft)	North Residential (170 ft[b])	East Residential (340 ft[b])	Southeast Residential (900 ft[b])
Demolition	86	75	69	61
Site Preparation	84	73	67	59
Grading / Excavation	85	74	68	60
Trenching / Foundation	82	71	65	57
Building – Exterior	82	71	65	57
Building – Interior/ Architectural Coating	74	63	57	49
Paving	85	74	68	60

SOURCE: Illingworth & Rodkins, 2025.
NOTES:
[a] These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.
[b] The distances shown in the table were conservatively measured from the center of the construction area to the receiving property lines.

TABLE 13 - CONSTRUCTION NOISE LEVELS AT 50 FEET (TERRACE BUILDING)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L_{max})	Average Noise Level (L_{eq})
Demolition	Concrete/Industrial Saw (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)[a]	90 82 84/79	85
Site Preparation	Grader (1)[a] Tractor/Loader/Backhoe (1)[a]	85 84	84
Grading / Excavation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1)[a]	85 82 84	84
Trenching / Foundation	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	84 81	82
Building - Exterior	Crane (1) Forklift (2) Generator Set (2)[a, a]	81 75 81	81
Building – Interior / Architectural Coating	Air Compressor (1)[b]	78	74

SOURCE: Illingworth & Rodkins, 2025.
NOTES:
[a] Denotes the loudest pieces of construction equipment per phase.
[b] Denotes the loudest piece of construction equipment per phase.

TABLE 14 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (TERRACE BUILDING)

Phase	Hourly Average Noise Levels[a], dBA L_{eq}			
	Source (50 ft)	Northeast Residential (800 ft[b])	East Residential (100 ft[b])	Southeast Residential (1,150 ft[b])
Demolition	86	62	80	59
Site Preparation	84	60	78	57
Grading / Excavation	85	61	79	58
Trenching / Foundation	82	58	76	55
Building – Exterior	82	58	76	55
Building – Interior/ Architectural Coating	74	50	68	47

SOURCE: Illingworth & Rodkins, 2025.
NOTES:
[a] These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.
[b] The distances shown in the table were conservatively measured from the center of the construction area to the receiving property lines.

TABLE 15 - CONSTRUCTION NOISE LEVELS AT 50 FEET (ADMINISTRATION/STUDENT SUPPORT BUILDING)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L_{max})	Average Noise Level (L_{eq})
Demolition	Concrete/Industrial Saw (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)[a]	90 82 84/79	85
Site Preparation	Grader (1)[a] Tractor/Loader/Backhoe (1)[a]	85 84	84
Grading / Excavation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1)[a]	85 82 84	84
Trenching / Foundation	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	84 81	82
Building - Exterior	Crane (1) Forklift (2) Generator Set (2)[a, a]	81 75 81	81
Building – Interior / Architectural Coating	Air Compressor (1)[a]	78	74

SOURCE: Illingworth & Rodkins, 2025.
NOTES: Estimated construction noise levels of the administration building were calculated to support the programmatic analysis.
[a] Denotes the loudest pieces of construction equipment per phase.

TABLE 16 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (ADMINISTRATION/STUDENT SUPPORT BUILDING)

	Hourly Average Noise Levels[a], dBA L_{eq}				
Phase	Source (50 ft)	Northwest Residential (550 ft[b])	North Residential (690 ft[b])	East Residential (730 ft[b])	Southeast Residential (1,750 ft[b])
Demolition	86	65	63	63	55
Site Preparation	84	63	61	61	53
Grading / Excavation	85	64	62	62	54
Trenching / Foundation	82	61	59	59	51
Building – Exterior	82	61	59	59	51
Building – Interior/ Architectural Coating	74	53	51	51	43

SOURCE: Illingworth & Rodkins, 2025.
NOTES: Estimated construction noise levels of the administration building were calculated to support the programmatic analysis.
[a] These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.
[b] The distances shown in the table were conservatively measured from the center of the construction area to the receiving property lines.

TABLE 17 - CONSTRUCTION NOISE LEVELS AT 50 FEET (S-1 BLEACHER EXPANSION, NEW PRESS BOX)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L_{max})	Average Noise Level (L_{eq})
Demolition	Concrete/Industrial Saw (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)[a]	90 82 84/79	85
Site Preparation	Grader (1)[a] Tractor/Loader/Backhoe (1)[a]	85 84	84
Grading / Excavation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1)[a]	85 82 84	84
Trenching / Foundation	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	84 81	82
Building - Exterior	Crane (1) Forklift (2) Tractor/Loader/Backhoe (2)[a, a]	81 75 84/79	81
Paving	Cement and Mortar Mixer (4)[a] Paver (1) Roller (1) Tractor/Loader/Backhoe (1)[a]	80 77 80 84	82

SOURCE: Illingworth & Rodkins, 2025.

NOTES: Estimated construction noise levels of the stadium expanded bleachers were calculated to support the programmatic analysis.

[a] Denotes the loudest pieces of construction equipment per phase.

[b] Denotes the loudest piece of construction equipment per phase.

TABLE 18 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (S-1 BLEACHER EXPANSION, NEW PRESS BOX,)

	Hourly Average Noise Levels[a], dBA L_{eq}				
Phase	Source (50 ft)	Northwest Residential (750 ft[b])	North Residential (540 ft[b])	East Residential (530 ft[b])	Southeast Residential (1,600 ft[b])
Demolition	86	62	65	65	56
Site Preparation	84	60	63	63	54
Grading / Excavation	85	61	64	64	55
Trenching / Foundation	82	58	61	61	52
Building – Exterior	82	58	61	61	52
Paving	85	61	64	64	55

SOURCE: Illingworth & Rodkins, 2025.

NOTES: Estimated construction noise levels of the stadium expanded bleachers were calculated to support the programmatic analysis.

[a] These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.

[b] The distances shown in the table were conservatively measured from the center of the construction area to the receiving property lines.

TABLE 19 - CONSTRUCTION NOISE LEVELS AT 50 FEET (S-2 STADIUM ENTRANCE & FIELD HOUSE)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L_{max})	Average Noise Level (L_{eq})
Demolition	Concrete/Industrial Saw (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)[a]	90 82 84/79	85
Site Preparation	Grader (1)[a] Tractor/Loader/Backhoe (1)[a]	85 84	84
Grading / Excavation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1)[a]	85 82 84	84
Trenching / Foundation	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	84 81	82
Building - Exterior	Crane (1) Forklift (2) Generator Set (2)[a, a]	81 75 81	81
Building – Interior / Architectural Coating	Air Compressor (1)[a]	78	74

NOTES: Estimated construction noise levels of the stadium entrance and field house were calculated to support the programmatic analysis.
[a] Denotes the loudest pieces of construction equipment per phase.

TABLE 20 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (S-2 STADIUM ENTRANCE & FIELD HOUSE)

Phase	Hourly Average Noise Levels[a], dBA L_{eq}				
	Source (50 ft)	Northwest Residential (430 ft[b])	North Residential (450 ft[b])	East Residential (880 ft[b])	Southeast Residential (1,950 ft[b])
Demolition	86	67	67	61	54
Site Preparation	84	65	65	59	52
Grading / Excavation	85	66	66	60	53
Trenching / Foundation	82	63	63	57	50
Building – Exterior	82	63	63	57	50
Building – Interior/ Architectural Coating	74	55	55	49	42

NOTES: Estimated construction noise levels of the stadium entrance and field house were calculated to support the programmatic analysis.
[a] These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.
[b] The distances shown in the table were conservatively measured from the center of the construction area to the receiving property lines.

TABLE 21 - CONSTRUCTION NOISE LEVELS AT 50 FEET (S-3 NEW AUXILIARY FIELD AT BASEBALL FIELD)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L_{max})	Average Noise Level (L_{eq})
Site Preparation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (1)[a]	85 82 84	84
Grading / Excavation	Grader (1)[a] Rubber-Tired Dozer (1) Tractor/Loader/Backhoe (2)[a]	85 82 84/79	84
Trenching / Foundation	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	84 81	82

NOTES:
[a] Denotes the loudest pieces of construction equipment per phase.

TABLE 22 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (S-3 NEW AUXILIARY FIELD AT BASEBALL FIELD)

Phase	Hourly Average Noise Levels[a], dBA L_{eq}				
	Source (50 ft)	North Residential (400 ft[b])	Northeast Residential (340 ft[b])	East Residential (400 ft[b])	Southeast Residential (470 ft[b])
Site Preparation	85	67	68	67	66
Grading / Excavation	85	67	68	67	66
Trenching / Foundation	82	64	65	64	63

NOTES:
[a] These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.
[b] The distances shown in the table were conservatively measured from the center of the construction area to the receiving property lines.

b) Generation of excessive groundborne vibration or groundborne noise levels?

The FTA recommends vibration limits of 0.5 in/sec PPV (*peak particle velocity of the construction equipment adjusted for distance in inches per second*) to avoid damage to reinforced-concrete, steel, or timber buildings (e.g., new residential and modern commercial/industrial buildings without plaster), and 0.3 in/sec PPV to prevent damage to engineered concrete and masonry buildings (e.g., older residential structures without plaster).

Construction vibration levels are highest near the source and then attenuate with increasing distance. Vibration levels at various distances can be calculated as follows[33]:

Table 20 - Vibration Levels for Construction Equipment and Minimum Setbacks, summarizes the typical vibration levels expected from construction equipment at a distance of 25 feet and the minimum setback distances to be maintained to avoid cosmetic damage to nearby buildings.

TABLE 23 - VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT AND MINIMUM SETBACKS

Equipment		PPV at 25 ft. (in/sec)	Minimum Setback to Meet the Thresholds	
			0.3 in/sec PPV, feet	0.5 in/sec PPV, feet
Clam shovel drop		0.202	20	14
Hydromill (slurry wall)	in soil	0.008	3	2
	in rock	0.017	4	3
Vibratory Roller		0.210	20	15
Hoe Ram		0.089	12	8
Large bulldozer		0.089	12	8
Caisson drilling		0.089	12	8
Loaded trucks		0.076	11	8
Jackhammer		0.035	6	5
Small bulldozer		0.003	2	1

SOURCE: Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, September 2018, as modified by Illingworth & Rodkin, Inc., September 2025.

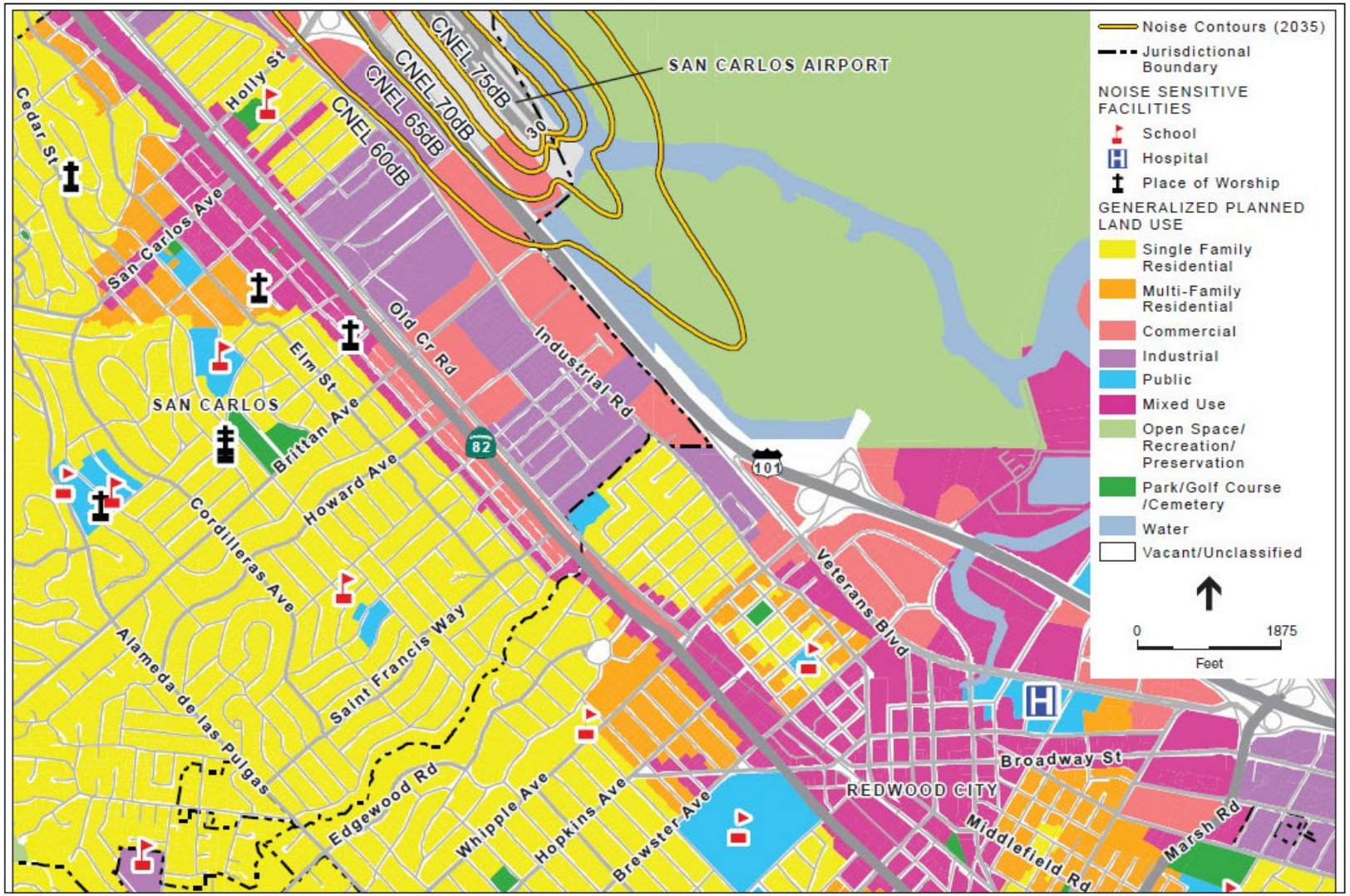
[33] Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, September 2018.

Construction activities would occur no closer than 95 feet from the nearest off-site building, well beyond the minimum safe distance of 20 feet. Based on a review of the setback distances listed in Table 13, the locations of project work areas, and buildings near the site, vibration levels from project construction would be less than 0.3 in/sec PPV and unlikely to cause any damage to the existing buildings. This impact would be ***less than significant***.

c) *For a project located 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?*

San Carlos Airport is a community airport situated approximately 1.9 miles east-northeast of the site. The Comprehensive Airport Land Use Compatibility Plan (ALUCP) for the San Carlos Airport area depicts the projected 2023 noise contours. Carlmont High School is located well outside the airport's 60 dBA CNEL noise contour, and it can be inferred from the contours that aircraft noise is not substantial at the site. According to an analysis of the ALUCP, aircraft operations are unlikely to produce noise levels exceeding 65 dBA CNEL at the site (**Figure 6, 2035 Noise Contours of the San Carlos Airport**).

Carlmont High School is located more than 8 miles from the San Francisco International Airport and well outside the airport's 65 dBA CNEL noise contour. All other Bay Area airports are located further from the project site. Thus, the project would have ***no impact*** as aircraft noise exposure would be considered compatible with the proposed educational uses.



Source: City/County Association of Governments of San Mateo County, 2019

FIGURE 6

2035 Noise Contours of the San Carlos Airport

Carlmont High School Facilities Master Plan

6.14 Population and Housing

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

6.14.1 Environmental Setting

The project site is located within the City of Belmont in San Mateo County. In 2023, the City's population was estimated at approximately 27,099 residents, with 10,528 households and an average household size of 2.57 persons.[34] At the county level, San Mateo County had an estimated population of 726,353 residents and 265,124 households, with an average household size of 2.69 persons.[35]

a) and b) Induce substantial unplanned population growth in an area, either directly or indirectly or displace substantial number of existing people or housing necessitating the construction or replacement of housing elsewhere?

The project would implement the proposed FMP improvements at the Carlmont High School. The project does not propose new housing or commercial businesses. The project does not propose to construct additional school facilities that would induce unplanned job or population growth, or result in the creation of new homes either directly or indirectly. At full buildout, the FMP would improve the conditions of the campus but would not increase student capacity compared to existing conditions. All improvement would be on campus within the project site. Therefore, the project would not remove any existing housing or people that would require the construction of additional housing to compensate for the loss of housing. ***No impact*** would occur.

[34] U.S. Census Bureau. 2023: ACS 5-Year Estimates Subject Tables. https://data.census.gov/table?q=city%20of%20belmont%20california. Accessed: October 17, 2025.
[35] U.S. Census Bureau. 2023. 2023: ACS 5-Year Estimates Subject Tables. https://data.census.gov/table?q=city%20of%20belmont%20california. Accessed: October 17, 2025.

6.15 Public Services

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools	☐	☐	☐	☒
Parks?	☐	☐	☒	☐

6.15.1 Environmental Setting

Fire Protection

The Belmont Fire Protection District (BFPD) provides fire suppression and emergency medical services to the project site. The BFPD operates two fire stations (Station 14 and Station 15), a Fire Administration office, and a temporary location for two vehicles at 15 Karen Road. The closest facility to the project site is Station 15, located approximately 0.8 mile to the northwest of the project site at 2701 Cipriani Boulevard. The station has three firefighters per 24-hour shift that includes at least one firefighter/paramedic and one fire captain.[36]

The Belmont Fire Protection District (BFPD) serves as one of the designated Paramedic First Response Service Providers within the San Mateo County Pre-Hospital Emergency Medical Services Group. Consequently, all BFPD fire engines are staffed and equipped to provide 24/7 advanced life support (ALS). The district adheres to a countywide response time standard of 6 minutes and 59 seconds for medical emergencies.[37]

[36] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.
[37] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.

The San Carlos/Redwood City Fire Department provides fire and emergency response services to the cities of San Carlos and Redwood City, the unincorporated portion of the Harbor Industrial Area and unincorporated portions within San Carlos. The San Carlos and Redwood City Fire Department is responsible for fire response, advanced life support (ALS) and paramedic response and hazardous material response for San Carlos. In addition, the Fire Department is also responsible for other services such as plan checks, fire prevention and fire hydrant testing. The transportation component of ALS services is contracted out to American Medical Response (AMR) through the County of San Mateo.[38]

Police Protection

Police protection services in the project area are provided by the Belmont Police Department. The Department's service divisions include the Youth Services/School Resources division. The Department is located in the City Hall at one Twin Pines Lanes, approximately 0.9 mile northeast of the project site. The City of San Carlos contracts police services with the San Mateo County Sheriff's Office. The project site is located within 2-mile driving distance from the Sheriff's Office service station.[39]

Schools

The Belmont-Redwood Shores School District (BRSSD) provides public education for students from kindergarten through eighth grade to residents of Belmont and the neighboring community of Redwood Shores, which is part of Redwood City. The BRSSD includes 4 elementary and 3 middle schools. The San Carlos School District also serves grades from transitional kindergarden through eighth grade and includes 4 elementary schools, 2 upper elementary schools, 2 middle schools, and a K-8 charter schools. Public education for ninth through twelfth grades for residents of the Cities of Belmont and San Carlos is provided by the SUHSD, which serves residents of southern San Mateo County. SUHSD's Carlmont High School, located in Belmont, serves both Belmont residents and students from surrounding communities.

Parks

Recreational opportunities in the vicinity of the project site include neighborhood parks, community parks, undeveloped park areas, school parks, and open space and trail areas for a total of approximately 405 acres.[40] McDougal Park is located approximately 0.2 mile northeast of the campus. The park is used for active recreation and athletic use.[41] The closest neighborhood/mini park to the campus is Hasting Tot Lot, located approximately 0.3 mile to the southwest. School parks within the project area include Central School, Fox School, Nesbit School, and Ralston Middle School.

a) *Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of*

[38] City of San Carlos. San Carlos General Plan.
[39] City of San Carlos. San Carlos General Plan.
[40] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.
[41] City of Belmont. 2025. McDougal Park. https://www.belmont.gov/Home/Components/FacilityDirectory/FacilityDirectory/50/35. Accessed October 12, 2025.

which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services: fire protection, police protection, schools, parks, other public facilities.

Fire Service

The proposed project would involve demolition, new construction, and renovation of existing facilities at the project site. While construction activities could result in a temporary increase in demand for fire protection and emergency response services due to the presence of workers and construction equipment, these activities would be temporary and would not require new or expanded fire protection facilities.

During operation, the proposed improvements would not increase the student capacity and therefore would not result in increased student enrollment or staff beyond existing conditions. Therefore, the project would not result in a substantial increase in service population or demand for fire protection services beyond existing conditions. The project site is within the service area of the BFPD and the San Carlos/Redwood City Fire Department. In addition, the project would comply with applicable building codes, fire codes, and District requirements including fire hydrant placement, fire flow standards, and access for emergency vehicles.

Accordingly, the proposed project would not require the construction of new or expanded fire protection facilities, the provision of which could result in significant environmental impacts. Therefore, project impact related to fire protection services would be *less than significant*.

Police Protection

The proposed project would occur entirely within the existing high school campus boundaries and would not involve changes in land use, circulation patterns, or off-site facilities that could increase calls for service. Implementation of the proposed FMP improvements would not increase the student population or otherwise expand school operations in a manner that would generate a significant increase in demand for police services.

While minor increases in police service demand may occur during the temporary construction period due to the presence of contractors and equipment on-site, these activities would be short-term and would not require new or expanded police facilities. During operation, the project would not result in population growth or the introduction of new uses that would significantly affect the ability of the Belmont Police Department to provide adequate service.

Therefore, the proposed project would not result in the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts. Impacts to police protection services would be *less than significant*.

Schools

The proposed project would involve redevelopment and improvements within the existing Carlmont High School campus. While the project would modernize and replace existing facilities, it would not expand the school's enrollment capacity or otherwise increase student population. As such, the project would not generate new demand for elementary, middle, or high school services within the BRSSD. Because the improvements would serve the existing student

body, the project would not require the construction of new school facilities or the expansion of existing ones beyond what is currently planned. Therefore, the project would result in ***no impact*** on school services.

Parks

The proposed project would redevelop and improve facilities within the existing Carlmont High School campus. While the project would modernize educational and athletic facilities for students, it would not increase student enrollment or otherwise expand campus capacity. Accordingly, the project would not result in additional demand for neighborhood or community parks, open space preserves, or trail systems in the surrounding area.

During construction, certain athletic facilities—such as the baseball field and other outdoor sports areas—would be temporarily unavailable for use. To maintain access to recreational and athletic opportunities, students would utilize nearby school parks and athletic fields available through existing joint-use agreements between the City and the School District. Upon completion of construction, all improved on-campus athletic facilities would be restored to full use.

Therefore, the project would not result in the physical deterioration of existing recreational facilities, nor would it necessitate the construction or expansion of recreational facilities in the surrounding community. Impacts on parks and recreational resources would be ***less than significant***.

6.16 Recreation

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

6.16.1 Environmental Setting

The San Mateo County Parks Department operates 24 parks and open spaces encompassing over 16,000 acres with almost 190 miles of trails, including regional and local trails.[42] These parks include a variety of natural settings—coastal, wooded, marine, bayside, etc.—and serve nearly 3 million visitors annually.[43]

The City of Belmont provides a variety of parks and recreation facilities to serve its residents. Parks are defined as land owned, leased, or otherwise made available to the City for public recreational use. In addition to City-owned facilities, several school district athletic fields are jointly planned and operated under shared-use agreements, allowing community access during non-school hours.[44]

The City's parks and recreation system is classified as follows:

- **Mini Park:** A small park, typically between 0.25 and 2 acres, located within residential neighborhoods. Mini parks provide play areas for young children and passive spaces for nearby residents within approximately a ¼-mile radius.
- **Neighborhood Park:** A medium-sized park, generally 2 to 10 acres in size, designed to provide basic recreational amenities for residents within about a 1-mile radius.
- **Community Park:** A large park, typically 20 to 50 acres, offering both active and passive recreational opportunities that serve the entire city or a major portion of it.

[42] County of San Mateo. 2025. About the San Mateo County Park Department https://www.smcgov.org/parks/about-san-mateo-county-parks-department. Accessed September 12, 2025.
[43] County of San Mateo. 2025. San Mateo Parks Celebrates 100 Years. https://www.smcgov.org/parks. Accessed: September 12, 2025.
[44] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.

- **School Park:** Athletic fields and recreational facilities located on school sites that are made available for community use through joint-use agreements between the City and the School District.
- **Special Facility:** A unique recreational or cultural facility—such as a community center, athletic complex, or aquatic center—designed to meet specific recreational needs for all or part of the City's population.

Within the City of Belmont there are 14 developed parks, two undeveloped parks, 11 athletic fields, and more than 160,000 square feet of public buildings. These parks and recreation facilities include both improved parks and open space parcels that have been donated to the City in recent years but have not yet been developed for public use.

Parks in Belmont are generally classified by service area and function. Mini parks typically serve neighborhoods within a one-quarter-mile radius, neighborhood parks serve residents within about a 1-mile radius, and community parks provide recreational amenities that serve the entire city. In addition to these facilities, the City maintains a joint-use agreement with the Belmont–Redwood Shores Elementary School District for the athletic fields at Fox, Ralston, Nesbit, and Central Schools. Under this agreement, the City maintains the fields and schedules their use during non-school hours. The joint-use agreement is periodically renewed.

Undeveloped open space areas within Belmont are also available to the public for passive recreation such as walking, hiking, and nature observation. The Parks and Recreation Department offers a wide range of recreation programs for residents of all ages, including preschool and youth camps, exercise and enrichment programs for adults (such as yoga and softball), and senior programs such as language groups, knitting, and Tai Chi. Many of these programs are hosted at the Twin Pines Senior and Community Center, the Barrett Community Center, and the Belmont Sports Complex.

Future recreation priorities include identifying community recreation needs and evaluating which programs should be continued, expanded, or modified to best meet the interests of Belmont residents.

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

As discussed under **Section 6.14, Population and Housing**, the proposed project would not result in population growth as it would not increase the school capacity or alter the school's existing student population. While construction activities may temporarily limit public access to the school's athletic fields, these impacts would be short-term and would not substantially affect the use of nearby neighborhood or regional parks. Therefore, the project would not increase demand on existing parks or recreational facilities to a degree that would cause physical deterioration or accelerated wear. This impact would be ***less than significant***.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

The proposed project would renovate and modernize existing school facilities, including recreational amenities such as playground equipment, blacktop resurfacing and painting, and

turf improvements. While the renovation or replacement of these existing recreational facilities could potentially affect the environment, implementation of the mitigation measures presented in this Initial Study would reduce any potential environmental impacts to a less-than-significant level. Therefore, the project would not result in adverse physical effects on the environment due to the construction of improvements at the school site. This impact would be ***less than significant***.

6.17 Transportation

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

6.17.1 Environmental Setting

Existing Roadway Network

The project site is located on Alameda de las Pulgas, between Cranfield Avenue and El Verano Way. Alameda de las Pulgas functions as a minor arterial roadway that provides north–south connectivity between the City of Belmont and the City of San Carlos. Through the project frontage, the roadway includes two travel lanes (one in each direction), striped Class II bicycle lanes, and a posted speed limit of 30 miles per hour. In addition, thirty-one angled parking spaces are provided along the school frontage on the south side. El Verano Way is a north–south, two-lane residential street that provides direct access to the school's western driveway. It includes on-street parking and has a posted speed limit of 25 miles per hour. Cranfield Avenue, a north–south cul-de-sac at the school's eastern boundary, has limited on-street parking and no posted speed limit. Chula Vista Drive, located between El Verano Way and Cranfield Avenue, is a north–south, two-lane local residential street that provides direct access to the school's largest parking lot; it also has no posted speed limit.

Three intersections directly serve the school: Alameda de las Pulgas/El Verano Way, Alameda de las Pulgas/Chula Vista Drive, and Alameda de las Pulgas/Cranfield Avenue/East Driveway. The El Verano Way intersection is all-way stop controlled, with a dedicated eastbound right-turn lane. The Chula Vista Drive intersection is also all-way stop controlled, with left-turn lanes on the eastbound and westbound approaches of Alameda de las Pulgas, and single-lane approaches from Chula Vista Drive and the central driveway. The Cranfield Avenue/East Driveway intersection is side-street stop controlled, with stop control on both Cranfield Avenue and the East Driveway. Cranfield Avenue and the East Driveway run parallel, separated by approximately 20 feet. The westbound approach on Alameda de las Pulgas includes a dedicated left-turn lane to access both Cranfield Avenue and the East Driveway.

Existing Site Access

Carlmont High School has three primary vehicular access points along Alameda de las Pulgas. The West Driveway, opposite El Verano Way, provides access to off-street visitor and staff parking areas, with spaces arranged perpendicular to the drive aisle. This entrance is also used for student drop-off and provides direct access to the administrative and arts buildings. The Center Driveway, opposite Chula Vista Drive, provides access to the senior student parking lot, which contains both perpendicular and diagonal parking spaces. The East Driveway, adjacent to Cranfield Avenue, serves junior student parking to the east of the driveway and additional staff parking to the south, both in off-street lots.

In addition, a paved service driveway, Highland Road, runs along the southern edge of campus and connects the East and West driveways. This one-way, westbound route provides limited internal circulation for staff, school buses, and large trucks, while student parking areas remain separated and require re-entry from Alameda de las Pulgas. The campus maintains a posted speed limit of 5 miles per hour.

Existing Bicycle and Pedestrian Facilities

The surrounding sidewalk network is generally continuous, with ADA-compliant curb ramps at marked crosswalks. However, the north side of Alameda de las Pulgas, opposite the school, does not have sidewalks between Chula Vista Drive and Cranfield Avenue.

At nearby intersections, high-visibility crosswalks are provided on all approaches at Alameda de las Pulgas/El Verano Way, and on the north and west approaches at Alameda de las Pulgas/Chula Vista Drive. The sidewalk continues across the driveway on the south side of Chula Vista Drive, but there is no marked crosswalk on the east approach. At the Alameda de las Pulgas/Cranfield Avenue/East Driveway intersection, the only available crosswalk is provided on the south approach across the East Driveway and Cranfield Avenue.

Within the campus, pedestrians circulate via indoor hallways and outdoor walkways, with marked crossings provided where drive aisles intersect pedestrian routes. Bicyclists enter campus via the East Driveway and may park in a secure bicycle cage north of the swimming pool. Bicycles do not circulate within the campus interior.

Existing Transit Services

Carlmont High School is served by three SamTrans bus routes: 60, 61, and 295. Routes 60 and 61 are school-oriented, each providing three morning and three afternoon runs on weekdays. Route 60 operates between Ralston Middle School and Redwood Shores via the Belmont Caltrain Station, while Route 61 runs from Ralston Middle School through Belmont and San Carlos, serving Carlmont High School, Tierra Linda School, and Heather School before terminating at the San Carlos Caltrain Station. Route 295 provides daily service between the Hillsdale Shopping Center and the Redwood City Transit Center, operating with approximately one-hour headways on both weekdays and weekends. Service begins at 6:20 AM eastbound toward Hillsdale and 7:16 AM westbound toward Redwood City.

Bus boarding for Carlmont occurs on Alameda de las Pulgas at El Verano Way. Eastbound passengers are dropped off adjacent to the school with direct campus access, while westbound passengers must cross both El Verano Way and Alameda de las Pulgas to reach the school.

In addition to SamTrans, Carlmont High School is served by district-operated buses that provide dedicated student transportation to and from East Palo Alto. These routes run on regular school days as well as early release days, with morning arrivals around 8:00 AM (later on late-start Wednesdays) and afternoon departures between 3:45 and 3:55 PM. This service supplements public transit by providing direct access for students from neighborhoods, not otherwise covered by SamTrans.

Existing Emergency Access

Emergency vehicles can access the project site from the driveways on Alameda de las Pulgas. Below is a list of emergency response centers (including fire stations, police departments, and emergency medical services) in proximity to the project site:

- Fire stations:
    - San Mateo Consolidated Fire Station 15 — approximately 1 mile away
    - San Mateo Consolidated Fire Station 14 — approximately 1.7 miles away
- Police:
    - Belmont Police Department (6th Avenue and Emmett Avenue) — approximately 1.5 miles away
- Emergency medical services:
    - San Mateo Medical Centre (West 39th Avenue and Edison Street) — approximately 2.3 miles away accessed via Alameda de las Pulgas or Ralston Avenue & El Camino Real
    - Carbon Health Urgent & Primary Care San Mateo (North El Camino Real and 31st Avenue) — approximately 2.8 miles away accessed via Alameda de las Pulgas or Ralston Avenue & El Camino Real
    - Sutter Health San Carlos Center Urgent Care — approximately 2.5 miles away accessed primarily via Ralston Avenue or San Carlos Avenue.

a) *Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?*

All project construction, including new building work and interior renovations, would occur entirely within the project site and would not obstruct or interfere with existing transit, bicycle, or pedestrian facilities in the surrounding area. Construction material staging and storage would be fully contained within designated, fenced locations on campus near each activity area. Access for construction of the T-Wing building, Terrace Building, and baseball field renovation would be provided via the campus entrance at Alameda de las Pulgas and San Carlos Avenue. Other accessways may be used for remaining construction activities, particularly for the new Administration/Student Support Building.

To minimize potential impacts on bicycle access to on-site parking via the San Carlos driveway, the project would provide clear signage, install temporary barriers separating truck traffic from

bike routes, and schedule construction deliveries outside of peak arrival and dismissal times. The proposed project would comply with the District's SCM-8, which requires traffic control measures designed to maintain safe and efficient circulation for vehicles and pedestrians on public streets affected by construction. Therefore, construction would not disrupt circulation near the project site or conflict with existing programs, plans, ordinances, or policies related to the circulation system.

Project operation would not disrupt existing or planned circulation facilities or services, nor would it conflict with applicable circulation-related programs, plans, ordinances, or policies. The proposed FMP focuses on modernizing and adapting existing campus facilities rather than expanding capacity. Because the project would not increase student enrollment, it would not substantially increase pedestrian or bicycle traffic on off-site routes. The project would not remove any facilities designed to protect pedestrians and bicyclists or interfere with planned improvements identified in the City of Belmont General Plan Circulation Element, the City of Belmont Bicycle and Pedestrian Master Plan, or the Alameda de las Pulgas/San Carlos Avenue Corridor Study. These studies propose long-term multimodal improvements in the project vicinity, including new roundabouts, upgraded pedestrian crossings, and bicycle lane enhancements to improve traffic flow and safety. All improvements are within the public right-of-way and would not be affected by the project, which is contained within the campus boundary.

Within the project site, the FMP includes improvements to pedestrian pathways and circulation, such as the creation of a new quad connecting campus buildings, direct pedestrian connections to the Terrace Building, an accessible regraded stadium entry plaza, and accessibility upgrades at the tennis courts, enhancing access to modernized facilities.

The proposed reconstruction of the T-Wing building would require temporary swing space in the parking lot west of the practice gym. Temporary portable classrooms would be installed to accommodate classroom functions during construction, resulting in the temporary loss of approximately 46 student parking spaces, including two accessible spaces, for the two-year construction period. Students would continue to use other parking spaces on campus or on surrounding public streets. If temporary parking demand exceeds supply, the Sequoia Union High School District could implement short-term measures, such as on-campus reallocation or shared-use agreements, while maintaining compliance with ADA and City of Belmont parking requirements.

According to CEQA Guidelines and established case law, small temporary reductions in parking supply are not considered significant environmental impacts. Parking shortages are a social inconvenience, not an environmental impact, unless they result in substantial secondary environmental effects, such as air quality impacts. Given available transit service, walking and bicycling options, and other parking demand management measures, this temporary reduction would not substantially change travel patterns or result in secondary environmental effects.

Therefore, the project would not conflict with any program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and would result in a ***less-than-significant*** impact.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

The construction workforce is anticipated to average 50 daily workers, with a maximum of 75 on peak days. Daily truck trips are estimated to range from 1 to 50, with peak activity during new building construction. Assuming each worker makes one round-trip commute per day and parks on campus, approximately 100 daily construction worker trips would occur on average, with a maximum of 150. With an average of 25 truck trips per day, total construction-related trips would average approximately 125 per day, with a maximum of 200 on peak days.

While construction would temporarily increase vehicle trips, the number is small relative to daily school-generated trips. Based on ITE trip generation rates for Carlmont High School's enrollment and staffing, the campus generates approximately 4,578 daily vehicle trips under existing conditions. At peak construction (200 trips), construction traffic would represent only about 4% of daily campus trips.

The project would comply with SCM-8 traffic control measures, including flaggers, construction signage, and scheduling truck trips during non-peak hours. The construction workforce would be sourced locally within the greater Bay Area, minimizing commute distances and vehicle miles traveled (VMT). Construction traffic is temporary, limited to the approximately two-year major construction period (2027–2029), and would not substantially increase roadway travel or VMT.

Since the FMP assumes no increase in student enrollment, project operation would not generate new vehicle trips or increase roadway travel.

Therefore, the project would not conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). This impact would be ***less than significant***.

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

Construction activities, including demolition, grading, equipment staging, and utility installation, would occur entirely within the project site and would not create hazardous conditions for off-site bike lanes, sidewalks, or transit facilities. Construction material staging would be contained within fenced onsite locations near respective activity areas, keeping equipment and materials clear of campus pedestrian and bicycle paths.

Construction loading and parking would occur at designated staging areas, separate from student and staff parking, pick-up/drop-off zones, and campus loading functions. No lane or roadway closures are anticipated. Loading would be scheduled to avoid peak arrival and dismissal times, consistent with SCM-8, further reducing potential hazards.

The project would not introduce new vehicle, pedestrian, or bicycle access points or create geometric design features that could pose hazards. Because student enrollment would not increase, operational parking or loading demand would not create hazardous conditions.

Therefore, the project would not substantially increase hazards for people walking, bicycling, driving, or riding transit due to a proposed geometric design, and would result in a in a ***less than significant*** impact.

d) Result in inadequate emergency access?

No road or lane closures are anticipated during construction. All construction activities would be contained on-site, ensuring emergency vehicle access remains unobstructed. Three driveways provide access to the campus from Alameda de las Pulgas, all of which are expected to remain open. Primary construction access for the T-Wing, Terrace Building, and baseball field renovation would be via the Alameda de las Pulgas/San Carlos Avenue entrance, with additional access points used as needed for other construction activities.

Construction-related traffic is not expected to generate congestion that would impede emergency response. Deliveries would be coordinated to prevent simultaneous entry and exit, maintaining clear emergency routes. Construction parking would occur in designated staging areas separate from campus circulation zones.

The project would not modify driveway configurations or add new access points. With no increase in student enrollment, operational parking or loading demand would not impede emergency circulation. Emergency vehicles would continue to have direct access to the campus, and nearby emergency routes (e.g., Ralston Avenue, Chula Vista Drive) would remain unaffected.

Therefore, the project would not result in inadequate emergency access, and the impact would be ***less than significant***.

6.18 Tribal Cultural Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Has a California Native American Tribe requested consultation in accordance with Public Resources Code Section 21080.3.1(b)?				
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources 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:				
a) 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)?	☐	☒	☐	☐
b) 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 the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?		☒	☐	☐

a) 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)?

b) 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 the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Assembly Bill (AB) 52 provides for consultation with California Native American tribes during the CEQA environmental review process and equates significant impacts to "tribal cultural resources" with significant environmental impacts. Public Resource Code (PRC) Section 21074 states that "tribal cultural resources" are:

- Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe and are one of the following:
- Included or determined to be eligible for inclusion in the California Register of Historical Resources.
- Included in a local register of historical resources as defined in subdivision (k) of PRC Section 5020.1.

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 PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

A “historical resource” (PRC Section 21084.1), a “unique archaeological resource” (PRC Section 21083.2(g)), or a “nonunique archaeological resource” (PRC Section 21083.2 (h)), may also be a tribal cultural resource if it is included or determined to be eligible for inclusion in the California Register.

AB 52 also establishes a formal consultation process for California tribes regarding cultural resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to “begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project.” Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency. Following notification of a project, tribes have 30 days to request consultation with the lead agency.

The purpose of consultation is to inform the lead agency in its identification and determination of the significance of tribal cultural resources. If a project is determined to result in a significant impact on an identified tribal cultural resource, the consultation process must occur and conclude prior to adoption of a Negative Declaration or Mitigated Negative Declaration, or certification of an Environmental Impact Report (PRC Sections 21080.3.1, 21080.3.2, 21082.3).

On July 16, 2025, the District sent AB 52 outreach letters to the tribes listed in the contact list provided by the Native American Heritage Commission (NAHC) on April 29, 2025. The letters sent described the project, provided maps of the project site, and invited the tribes to request consultation should they have any concerns. On July 17, 2025, the Costanoan Rumsen Carmel Tribal to request further discussion. On July 25, 2025, the Muwekma Ohlone Tribe also responded to request further discussion.

On September 11, 2025, the District extended an invitation to both tribes to initiate the formal consultation in compliance with AB52. At the time of publishing this Initial Study, none of the tribes has responded back. The District would remain committed to ensuring that tribal representatives are included in all communications and are informed on the availability of project’s environmental documents and opportunities for input should the tribes wish to engage in consultation at a later stage.

A tribal cultural resource is adversely affected when a project impacts its significance. The proposed project would have to comply with SCM-3, which requires contacting the descendent of the representative native group upon discovery during construction of an archaeological site associated with descendant Native Americans. As required by SCM-3, the District will consult with the representative regarding the appropriate treatment, management, and, if applicable, interpretation of the site and any recovered materials, and as needed, will provide the opportunity to monitor archaeological field investigations at the site.

As discussed in **Section 6.5, Cultural Resources, Mitigation Measure CR-1b: Unanticipated Archaeological Resources** and **Mitigation Measure CR-2: Avoid Impact to Human Remains**, include provisions to address resources encountered during construction. Therefore, project impact on tribal cultural resources would be ***less than significant with mitigation.***

6.19 Utilities and Service Systems

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider that 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

6.19.1 Environmental Setting

Water Supply

Water service within the project area is provided by the Mid-Peninsula Water District (MPWD), which serves the City of Belmont, portions of the City of San Carlos, Redwood City, and parts of unincorporated San Mateo County, including the Harbor Industrial Area (HIA).

MPWD purchases all of its water from the San Francisco Public Utilities Commission (SFPUC). A major portion of SFPUC water supply originates from the Sierra Nevada mountains via the Hetch Hetchy Regional System, while the remainder is supplied by the SFPUC from its local watersheds and facilities located in Alameda and San Mateo Counties.[45] Water demand in Belmont is influenced by local development, including new housing and employment growth, which is expected to increase overall water use. However, conservation measures and updated plumbing and building codes are projected to gradually offset these increases.[46]

[45] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.
[46] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.

Wastewater

The wastewater system in Belmont city limits includes about 85 miles of gravity sewer pipelines, mostly 6-inch vitrified clay pipe, along with 11 pump stations and roughly five miles of force mains. Most of the city's wastewater is conveyed to the Silicon Valley Clean Water (SVCW) treatment plant, which discharges treated effluent into the San Francisco Bay. A few small residential areas at the city's borders direct wastewater outside Belmont.[47]

According to the City of Belmont 2010 Sanitary Sewer System Capacity Analysis, some pipeline segments do not meet hydraulic design standards, though they can still convey wastewater without spills. With ongoing and planned improvements, the system is expected to handle average and peak dry weather flows through 2030. However, wet weather inflow may exceed capacity, requiring additional measures. Both the City and SVCW have active Capital Improvement Programs, including flow equalization projects, to address future wet weather flows.[48]

Solid Waste

The City of Belmont and the County of San Mateo are both members of the South Bay Waste Management Authority (SBWMA), also known as Rethink Waste.[49] Recology provides residential and commercial waste collection, recycling, composting, and hazardous waste pickup. Collected materials are processed at the Shoreway Environmental Center. Approximately 92 percent of the solid waste in the City of Belmont is sent to Ox Mountain Sanitary Landfill, located in Half Moon Bay, San Mateo County. The landfill takes care of various waste streams including typical household waste and accepts recyclables and yard waste drop-offs under specified conditions.[50] The Ox Mountain Sanitary Landfill is estimated to reach capacity in 2034.[51]

Electricity and Natural Gas

Pacific Gas & Electric Company (PG&E) is the natural gas and electricity provider for the City of Belmont.[52]

[47] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.
[48] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.
[49] City of Belmont. 2017. Draft Environmental Impact Report. General Plan, Phase I Zoning, Belmont Village Specific Plan, and Climate Action Plan. June 30.
[50] Recyclestuff.org. 2025. Ox Mountain Sanitary Landfill. https://recyclestuff.org/company/ox-mountain-sanitary-landfill-94019. Accessed September 16, 2025.
[51] County of San Mateo. 2018-2019 San Mateo County Civil Grand Jury. Planning for the County's Waste Management Challenge. https://sanmateo.courts.ca.gov/system/files/waste_management.pdf. Accessed September 16, 2025.
[52] City of Belmont. Utilities and other Agencies. https://www.belmont.gov/i-want-to/find/utilities-other-agencies. Accessed October 12, 2025.

a) Require or result in the relocation or construction of construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?

The proposed FMP project involves the modernization and redevelopment of existing campus facilities, including updated classroom and support spaces. Temporary water demand would occur during construction activities, after which water use would continue to support normal school operations. The project would connect to existing municipal water supply infrastructure. Because the FMP improvements are not expected to increase overall student capacity, overall water demand is not anticipated to increase. In addition, in compliance with CalGreen, the project would incorporate water conservation measures—such as drought-tolerant landscaping, efficient irrigation systems, and water-saving fixtures— which would reduce water use. The project would continue to rely on existing wastewater, stormwater drainage, electric power, natural gas, and telecommunication systems serving the campus, with no new or expanded off-site utility infrastructure required. Therefore, implementation of the FMP would result in a ***less-than-significant*** impact on the provision of utility services.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project would not change the overall student capacity on campus. As noted above, temporary increases in water demand would occur during construction activities. Following completion, operational water demand is anticipated to be equal to or less than existing conditions due to the incorporation of water conservation measures consistent with applicable regulations, including drought-tolerant landscaping, efficient irrigation systems, and water-saving fixtures. Therefore, sufficient water supplies are expected to be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. This impact would be ***less than significant***.

c) Result in a determination by the wastewater treatment provider that 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?

The proposed project would not increase student enrollment capacity on campus and, therefore, would not result in an increase in long-term wastewater generation associated with school operations. While new restrooms and plumbing fixtures would be constructed as part of the project, these fixtures would be high-efficiency models that comply with CALGreen and other applicable water conservation standards, thereby reducing wastewater flows compared to older fixtures. As a result, overall wastewater generation is anticipated to remain the same as or less than existing conditions. The project would continue to be served by the WBSD, and would not result in the need for new or expanded off-site wastewater treatment facilities. Therefore, impacts related to wastewater treatment capacity would be less than significant.

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?

Implementation of the proposed project would generate solid waste during both construction and operation. Construction activities would result in temporary solid waste generation associated with demolition, site preparation, and building activities. The project would comply

with CALGreen Part 11, Title 24 of the California Code of Regulations mandating diversion of at least 65 percent of nonhazardous construction and demolition waste from landfills. Compliance with both local and state regulations would ensure that construction-related solid waste is properly managed and diverted to the maximum extent feasible.

During operation, the project would not increase student enrollment capacity and, therefore, would not substantially increase the amount of solid waste generated on campus. As required by the City of Belmont, the project would continue to comply with Assembly Bill 1826, which require preparing and implementing an organics recycling program.

Accordingly, the proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, nor would it impair the attainment of solid waste reduction goals. This impact would be ***less than significant.***

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

As noted under Criterion d) above, the proposed project would comply with the Town of Atherton Municipal Code (Chapter 15.52) and with CALGreen Part 11, Title 24 of the California Code of Regulations mandating diversion of at least 65 percent of nonhazardous construction and demolition waste from landfills. The project is not anticipated to substantially increase amounts of solid waste compared to existing conditions as the project would not increase the campus capacity. The proposed project would comply with applicable Federal and State solid waste management and reduction statutes and regulations. This impact would be ***less than significant***.

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6.20 Wildfire

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Is the project located in or near state responsibility areas or lands classified as high fire hazard severity zones? If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Require the installation 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐

6.20.1 Environmental Setting

As described in **Section 6.15, Public Services**, the BFPD provides fire suppression and emergency medical services to the City of Belmont. The closest BFPD facility to the project site is Station 15, located approximately 0.8 mile to the northwest of the project site at 2701 Cipriani Boulevard. The BFPD services include Fire prevention and suppression, emergency medical services, wild land response, hazardous materials response.

In compliance with state regulations, Belmont has adopted Fire Hazard Severity Zone (FHSZ) maps, which classify areas based on wildfire risk. The project site is not within a zoned FHSZ. The moderate FHSZ is located approximately 0.2 miles to the west and southwest. Properties in Very High FHSZs are subject to stringent defensible space and home hardening requirements, including a mandatory 100-foot defensible space clearance around structures.

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

The campus is within a developed area in the City of Belmont, in a Local Responsibility Area. As noted above, the site is not within a designated fire hazard zone and does not fall within an area of state firefighting responsibility. The nearest fire hazard zone is classified “moderate” and is located at approximately 0.2 miles west and southwest of the project site. The proposed project would replace or renovate existing buildings. Construction or operation of the proposed project would not cause permanent alterations to vehicle circulation routes and patterns or impede public access or travel upon public rights-of-way. The proposed project would not be expected to impair the function of nearby emergency evacuation routes. The proposed project would be required to comply with standards of Chapter 7A of the California Building Code for the inclusion

of fire-resistant ratings of buildings components, such as firestops, shaft enclosures, partitions, smoke barriers, floors, fire-resistive coatings, and sprayed fire-resistant materials, among other items. Design of the proposed buildings, including consistency with ingress and egress requirements and other applicable requirements, would be reviewed by the BFPD and would comply with their requirements. Therefore, potential project impact on an adopted emergency response plan or emergency evacuation plan would be ***less than significant***.

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?

Construction of the proposed project would involve the use of some flammable materials such as gasoline, diesel fuel, hydraulic oils, paints, solvents, or other wastes. During construction, there would be ignition sources, including equipment that could create spark, be a source of heat, or leak flammable materials on the project site. The proposed project would be required to comply with California Occupational Safety and Health Administration (Cal/OSHA) Title 8, Section 1933, construction equipment must be equipped with at least one portable fire extinguisher that should be located no less than 25 feet, nor more than 75 feet, from any equipment using flammable liquids. The proposed project would also be required to comply with California Fire Code, Section 5705.3.7.5.3, which mandates that spill control and secondary containment be provided in accordance with Section 5703.4 when the capacity of an individual container exceeds 55 gallons. Compliance with these regulations would reduce the potential exacerbation of wildfire risks related to construction activities.

Project operation would be consistent with the allowable zoning for the project site. As noted under above, the proposed project would be required to comply with standards of Chapter 7A of the California Building Code. The proposed project would also be subject to requirements in Section 13000 et seq. of the California Health and Safety Code, California Building Standards Code, and California State Fire Code, which include regulations concerning the following: building standards for fire protection, fire protection and notification systems such as extinguishers and smoke alarms, safety for firefighters and emergency responders during emergency operations, minimum standards for hazardous vegetation and fuel management, defensible space, and building construction, and minimum standards for emergency access and water supply for fire response. Compliance with these existing regulatory requirements would ensure that the proposed project would not exacerbate wildfire risks. This impact would be ***less than significant***.

c) Require the installation 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?

The proposed project involves the demolition, construction, and renovation of campus building within the project site. The proposed project would include connections to existing utility facilities including water, sanitary sewer, storm drainage, electricity, and telecommunication infrastructure. Utility connections would be within the campus and would not be within the public right of way. The project does not propose the installation or maintenance of any new 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. Impacts would be ***less than significant***.

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?

Project construction would require the preparation of a SWPPP, as discussed in **Section 6.10 - Hydrology and Water Quality**. The SWPPP would include BMPs and erosion control measures to be used during construction to manage runoff flows. Additionally, as discussed in **Section 6.10 - Hydrology and Water Quality**, the proposed project would include stormwater management features on site that would manage all project runoff. Furthermore, the project site is not located within a flood zone or within an area identified as having potential for landslides. Therefore, the proposed project would not have the potential to expose people or structures to downslope or downstream flooding or landslides. This impact would be ***less than significant***.

6.21 Mandatory Findings of Significance

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially 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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to substantially 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?

As noted in **Section 6.4 - Biological Resources**, impacts to special status plants and wildlife could be potentially significant and therefore **Mitigation Measures BIO-1a, through BIO-1e, and BIO-2** would be required to reduce potential impacts to migratory nesting birds, special-status bat, and bumble bee species. Required mitigation measures would also protected trees remaining at the project site and ensure the replacement of trees to be removed. Incorporation of these mitigation measures would reduce impacts on biological resources to a ***less-than-significant*** level.

As noted under **Section 6.5 - Cultural Resources**, **Mitigation Measures CR-1a**, **CR-1b**, and **CR-2** would ensure that unanticipated archaeological resources, human remains, and Tribal Cultural Resources encountered during construction activities would be properly protected and project impact on archaeological resources would be ***less than significant***.

As noted under **Section 6.7 - Geology and Soils**, **Mitigation Measure GEO-1** would ensure that unanticipated paleontological resources encountered during construction activities would be properly protected. These measures would reduce the proposed project's potentially significant impact on paleontological resources to a ***less-than-significant*** level.

For these reasons, the proposed project's potential impact on degrading the quality of the environment would be ***less than significant with mitigation incorporated***.

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.)

As defined in Section 15065(a)(3) of the CEQA Guidelines, "cumulatively considerable" refers to a situation in which the incremental effects of an individual project are significant when considered together with the effects of past, current, and probable future projects.

The proposed project would not result in environmental effects that are individually limited but cumulatively considerable, because it does not generate long-term or growth-inducing impacts. The project involves the replacement and renovation of buildings within the Carlmont High School Campus, with new classrooms and improvements intended to serve the existing student population. The functions provided by the new buildings are already accommodated on the site, and no new land uses or expansions beyond the campus are proposed.

School facilities are inherently tied to the existing housing supply in the district, and improvements occur within already developed school sites. For these reasons, the project's cumulative environmental impacts are considered less than significant.

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

Effects to human beings are generally associated with air quality, noise, traffic safety, geology/soils, and hazards and hazardous materials. As described in **Section 6.3 Air Quality**, the proposed project would result in a significant impact related to air pollutants and health risk. These impacts would be less than significant with implementation of **Mitigation Measures AIR-1: Air District's Best Management Practices**.