Initial Study/Preliminary Mitigated Negative Declaration

Sequoia High School Facilities Master Plan

1201 Brewster Avenue, Redwood City, California 94062

April 17, 2026

Prepared for

Sequoia Union High School District

1090 Mills Way, Redwood City, California 94063

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TABLE OF CONTENTS

APPENDICES

LIST OF TABLES

LIST OF FIGURES

INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

California Environmental Quality Act (CEQA)

1.0 Project Information

Project Title:	Sequoia 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:	Sequoia High School 1201 Brewster Avenue, Redwood City, CA 94062
General Plan Designation:	Public Facilities

Project Overview

The proposed Facilities Master Plan project at Sequoia High School includes construction of a new approximately 14,000-square-foot, two-story classroom building with eight classrooms near the athletic field, student support services, restrooms, outdoor seating, and related site improvements, as well as expansion of the existing arboretum to create an outdoor classroom. The project also proposes substantial renovations and modernization of existing campus facilities, including seismic retrofitting and interior and systems upgrades to the historic Main Building, improvements to the multi-use room to enhance indoor-outdoor connectivity, modernization of the boys' and girls' locker rooms, and replacement of stadium lighting. Additional upgrades include improvements to Carrington Hall, the student activity building, stadium support spaces, installation of photovoltaic panels, roof resurfacing, restroom renovations, exterior repainting, artificial turf and drainage improvements at athletic fields, and lighting upgrades. The project would not increase overall student enrollment capacity. Some improvements are evaluated at a programmatic level due to limited project-specific details.

Project Location

The project site is Sequoia High School campus, located at 1201 Brewster Avenue in Redwood City, California. Encompassing approximately 35 acres, the campus is situated northeast of El Camino Real, approximately 0.84 miles southwest from U.S. Highway 101 (US 101), and 1 mile west from Woodside Road (**Figure 1**).

The project site is bounded by El Camino Real on the northeast, James Avenue on the east, Elwood Street on the southwest, Brewster Avenue on the northwest, and Broadway on the north.

Surrounding Land Uses

Commercial land uses, such as restaurants and shopping centers, are located north and east along El Camino Real. The campus is bordered by residential uses on the northwest, southwest, and southeast sides, and by apartment complexes to the northeast. McKinley Institute of Technology is situated South of the project site near Cornerstone community church and Our Lady of Mount Camel Church. Saint Michael's Preschool and Infant care is located south of the campus.

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;
- Redwood City 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 Sequoia 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 June 2, 2026.

Sequoia Union High School District
480 James Ave.
Redwood City, CA 94062
Attn: Facilities Department
Comments may also be sent by e-mail to: construction@seq.org

FIGURE 1

Project Location

Sequoia High School Facilities Master Plan

Source: Google 2025

3.0 Project Description

3.1 Existing Conditions

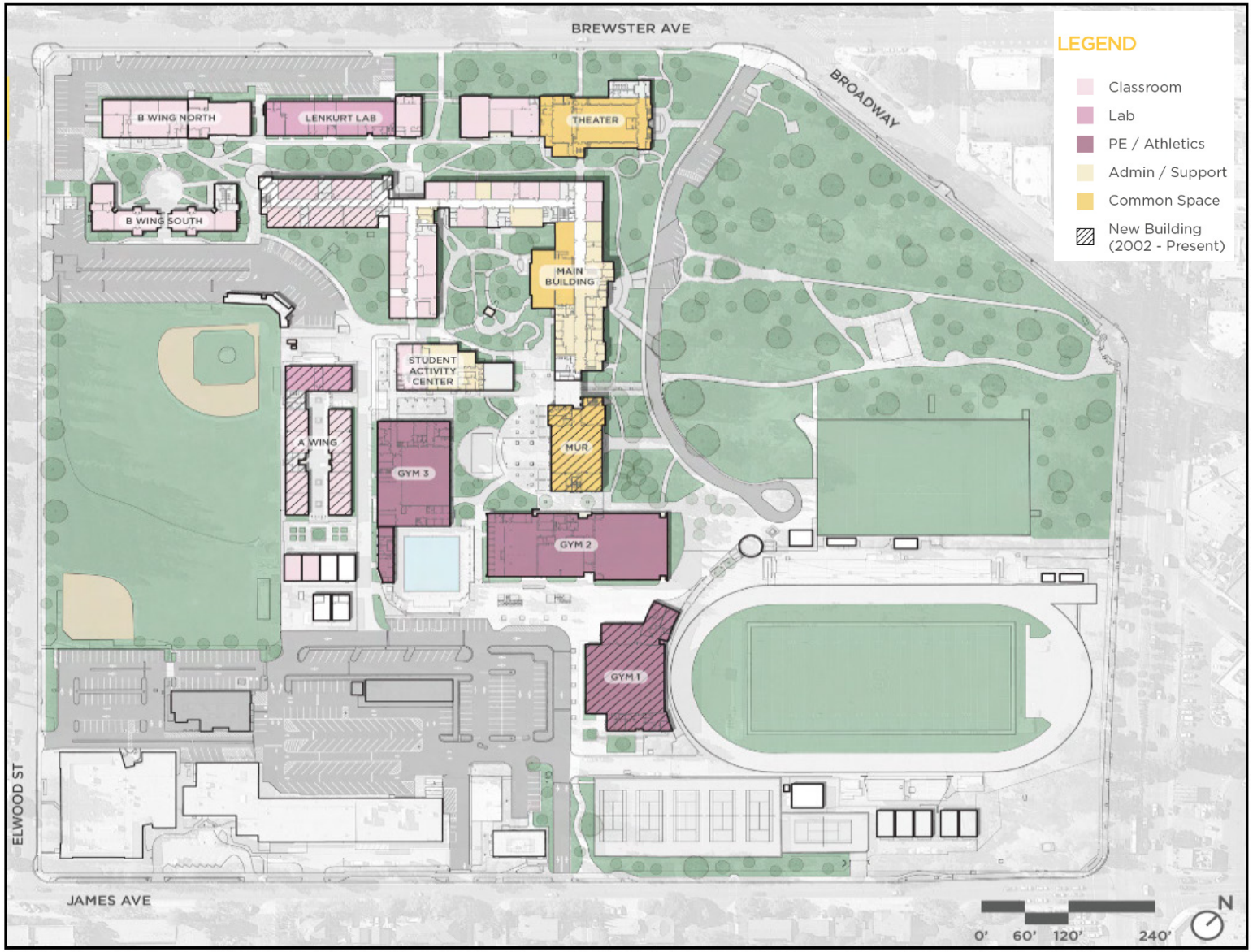
Founded in 1895, Sequoia High School is a four-year secondary public school with a student population of approximately 1,903 as of the 2023-2024 school year. With 155,540 square feet building space, the campus possesses approximately 109 classrooms which are located in wings A, B, the Main Building, and Carrington Hall (**Figure 2**). Sequoia High School's laboratories are distributed across the Lenkurt Laboratory Building and the A-Wing Building. The campus possesses six portable classrooms located south of the baseball field. Other facilities on campus include a theater, three gymnasiums, a student activity center, and a multi-use room. Buildings range from one- to two-story height. Sequoia High School also includes many athletic facilities such as a stadium, an aquatic center (pool), three gymnasiums, a baseball field, tennis courts, and a weight room. The north portion of the campus is occupied by an arboretum, including mature trees, pedestrian pathways, and seating areas. In addition to the arboretum, green space and landscape is present throughout the campus. **Table 1. Sequoia High School Campus Existing Facilities** provides a detailed list of the campus buildings, their corresponding square footage, and year of construction.

Classrooms are primarily situated in the northwest area of the campus, while the administration offices, student activity center, and multi-purpose room are in the center. Athletic facilities occupy the southwest and eastern sides of campus, with the baseball and softball fields in the southwest, multiple gymnasiums at the center, and the track and football field to the east. Greenspace (arboretum) is located on the north side of campus.

TABLE 1 – SEQUOIA HIGH SCHOOL CAMPUS EXISTING FACILITIES

Building Name	Use	Size (square feet)	Year of Construction
A-Wing	Classrooms / Laboratories	12,725	2008-2019
B-Wing North	Classrooms	11,498	1939-1949
B-Wing South	Classrooms	8,722	1991-2002
Lenkurt Lab	Laboratories	11,491	1958-1970
Carrington Hall	Theater / Classrooms	14,818	1923-1924
Main Building	Library / Administration/Classrooms	1st Floor: 60,460 2nd Floor: 42,905	1923-1924
Multi-Use Room	Multi-Purpose / Classrooms	21,456	1991-2002
Student Activity Center	Student Resource / Classrooms	13,156	1991-2002
Gymnasium 1	Athletic Facilities	17,878	2008-2009
Gymnasium 2	Athletic Facilities	23,978	1958-1970
Gymnasium 3	Athletic Facilities	12,989	1958-1970
Pool	Pool	13,356	1991-2002

SOURCE: Kitchell, 2025.



Source: CAW Architects, 2023

FIGURE 2
Site Plan
Sequoia High School Facilities Master Plan

3.1.1 Access and Circulation

The campus is located along the south side of El Camino Real in between the intersections with James Avenue from the southeast and Broadway from the northwest. Brewster Avenue intersects with Broadway along the west edge of the school. Elwood Street borders the campus to the southwest, while James Avenue runs along its southeastern boundary. The main campus entrance is from Elwood Street. Students drop-off and pick up is from James Avenue. Several other vehicular access points are located around the campus perimeter.

Pedestrian and Bicycle Access. Pedestrians and bicycle users can access the campus through multiple entry points located along the school's perimeter. Pedestrian walkways connect classroom buildings, and athletic facilities.

Campus Vehicular Parking. Parking is distributed within the southern portion of the campus, with a total of 347 parking spaces. Approximately, 247 parking spaces are designated for students, 100 for staff and visitors, and 17 spots are reserved for Americans with Disabilities Act (ADA)-compliant parking.

Bicycle Parking Facilities. Bicycle parking is available to students near the baseball field with four bicycle racks and two bicycle cages. Storage lockers for long board skateboards are located across the bike cages.

3.1.2 Campus Landscape

Trees are located throughout the campus, notably within the arboretum in the northern portion of campus near the stadium. In addition, a planted courtyard (the Tea Garden) is located between the administrative offices and the student activity center.

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. In 2024, approximately 1,862 students were enrolled at the school. Sequoia High School has a total of 205 staff members, including116 teachers as of 2024. School days include a seven period schedule, which start at 8:30 a.m. and end at 3:40 p.m.

TABLE 2 – STUDENT ENROLLMENT

	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Sequoia High School	2,041[1]	2,019[1]	1,945[1]	1,909[1]	1,903[1]	1,862[2]
Sequoia Union High School District	9,373	9,366	9,046	8,866	8,747	9,741

SOURCES: [1] Education Data Partnership. 2025. School Summary: Sequoia High School. https://www.ed-data.org/school/San-Mateo/Sequoia-Union-High/Sequoia-High. Accessed July 9, 2025.
[2] Sequoia High School. School Profile 2024-2025.
[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 Sequoia High School Facilities Master Plan (FMP) project (proposed project) would include the addition of a new classroom building, an outdoor classroom within the arboretum, retrofitting and modernization of the Main Building and the multi-use room, and miscellaneous improvements to other existing buildings and sports facilities. The proposed project is not intended to expand the campus's enrollment capacity.

3.2.1 Proposed New Facilities

This Initial Study addresses at the project level the construction of the new classroom building near the athletic field. The proposed construction of the outdoor classroom arboretum is addressed at a programmatic level. As more specific information become available, subsequent environmental review may be required to address project-specific impacts, pursuant to CEQA Guidelines sections 15168 and 15162.

Construction of the New Classroom Building

The proposed new classroom building (Facility N-1 in **Figure 3**) would be located near the athletic field. The addition of the approximate 14,000 square foot, two-story new classroom building would include eight general education classrooms, a student support services center, restrooms, and outdoor seating areas. Improvements associated with the new classroom building would be approximately 34,000 square feet and would include a reconfiguration of the fire lane and turnaround, and a new quad connecting the new classroom building with the multi-use room and existing football stadium entry (Figure 3). The architecture of the new building would reflect the historic nature of the campus.

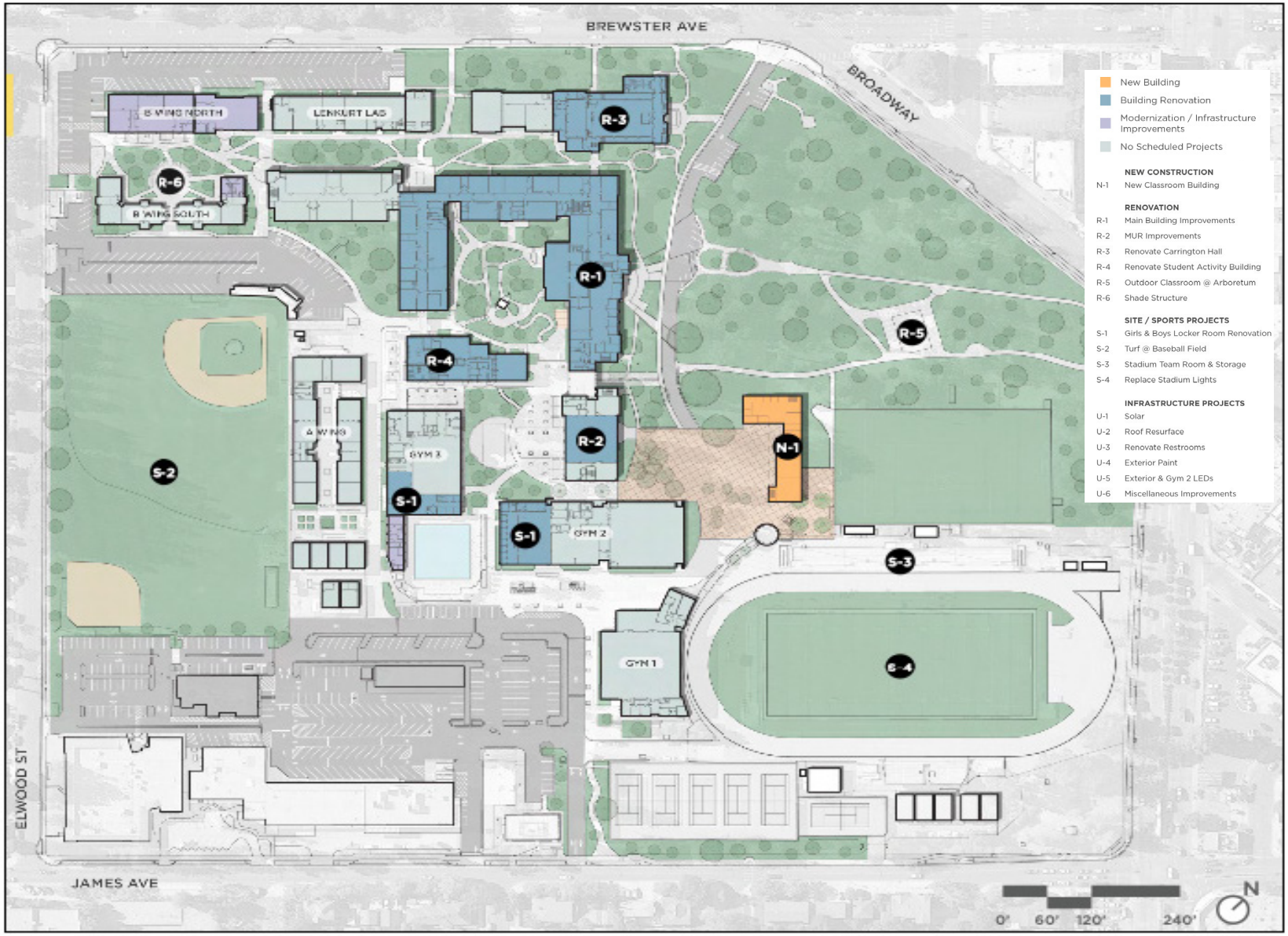
Outdoor Classroom Arboretum Addition

The proposed project would expand the existing concrete pad in the arboretum to create an outdoor classroom with shade, seating and power.

3.2.2 Proposed Renovations

The proposed renovations would include improvements to the Main Building and multi-use room, and renovation of Carrington Hall, the student activity building, a shade structure near B-Wing south (located at the western campus corner), the locker rooms, stadium team room and storage room, and stadium lights. Miscellaneous improvements would include photovoltaic panels, roof resurfacing, restroom renovations, exterior paint, and light emitting diode (LED)[1] lights for one of the gymnasiums.

[1] LED lights are electric lights that produce light through the movement of electrons in a semiconductor material. They are valued for their energy efficiency, long lifespan, and durability.



Source: CAW Architects, 2023

FIGURE 3

Proposed Facilities Master Plan

Sequoia High School Facilities Master Plan

This Initial Study addresses at the project level the proposed renovations of the Main Building, the multi-use room, the girls' and boys' locker rooms, and stadium lights. Other miscellaneous improvements, listed in Section 3.2.3 below are also addressed in this analysis. Other proposed renovations, such as the shade structure, student activity building, stadium team room, and storage room, are analyzed in this document at a programmatic level. As more specific information become available, subsequent environmental review may be required to address project-specific impacts, pursuant to CEQA Guidelines Sections 15168 and 15162.

Main Building Improvements

The proposed project would retrofit the approximately 102,000-square-foot two-story Main Building to reconfigure the existing administrative space, seismically retrofit the building's bell tower cupola, renovate the restroom, and upgrade the heating and ventilation system. In addition, roofing would be replaced with asphalt shingle roofs. Old windows would be replaced by customed colored dual pane, and corridors would be renovated by replacing the flooring and the lockers, as well as repainting and adding fixed seating areas. The proposed renovations would maintain the historic look of the building.

Multi-Use Room

The proposed improvements to the multi-use room would include replacing the existing windows and doors on both sides with larger, operable glazed partitions. These changes are designed to create a more seamless connection between the inner courtyard, located between the multi-use room and Gymnasium 3, and the new quad space to the northeast, allowing for improved student flow and greater indoor-outdoor flexibility (**Figure 3**).

Locker Room Renovations

The proposed project would renovate the approximately 5,800 square feet girls' locker room and 7,600 square feet boys' locker room. These renovations would include replacement and addition of new lockers, addition of a skylight to the girls' locker room, removal of a portion of the showers, and a modernization and upgrade of locker room finishes, such as ceiling, lighting, paint, flooring and restrooms.

Stadium Team Room and Storage Room Renovations

The storage, restroom and team rooms around the stadium would be replaced with new structures behind the home bleachers.

Student Activity Building Renovation

This project proposes to improve the finishes of the student activity building and reconfigure its spaces, as needed, to meet current educational requirements.

3.2.3 Other Miscellaneous Improvements

Additional miscellaneous improvements would include the following:

- Renovation of interior of Carrington Hall by updating the theater with new finishes, replacing fixed seats, improving lighting and updating stage rigging.
- Photovoltaic panels installed on a combination of roofs and shade structures
- Replacement of the stadium lights with LED fixtures mounted to new poles.
- Replacement the existing grass at the baseball and softball field with artificial turf and improve underground drainage systems.
- Renovation of existing restrooms.
- Resurfacing of building roofs.
- Application of new exterior paint.

3.2.4 FMP Project Construction

Schedule

Construction of the new classroom building is anticipated to begin in the winter of 2027 and be completed by end of 2028.

The proposed renovation projects are expected to start in mid-spring 2027 and last for approximately 24 to 30 months. Miscellaneous site improvements, such as roof resurfacing, solar panel installation, and exterior painting, would be phased over multiple summers, starting in 2026 through 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 the new building would include the installation of new utilities, including water, sewer, and electrical services. Areas around the construction site 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.

Construction Access

Access for construction of the new classroom building, as well as the renovation of the Main Building would be through the campus entrance on the intersection of Broadway and Brewster Avenue. No road or lane closures are anticipated during project construction.

Workforce and Truck Trips

The construction workforce during construction is anticipated to average approximately 48 daily workers, with a maximum of 57 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. Environmental Protection Agency (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.

Tree 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 Sections 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 FMP is focused on modernizing existing campus facilities and would not involve expanding the school's enrollment capacity. Accordingly, the project would not result in an increase in student enrollment, and upon completion of construction, campus operations would continue in a manner consistent with current conditions.

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.

Reviewed by: _____ Date: 04/21/2026

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 publicly accessible vantage points or the alteration of the overall scenic vista/corridor itself. Scenic vistas are generally interpreted as long range views, while scenic corridors are considered public views as seen along a linear transportation route.

The Sequoia High School campus is located within the Sequoia neighborhood of Redwood City. This neighborhood includes residential characterized by small scale traditional single-family homes. The streets are lined with mature trees that block the views of overhead power lines.[2] The Downtown neighborhood of Redwood is just east of the campus. This neighborhood is characterized by mostly two to three-story buildings with few four to ten stories. Several landmark buildings are located within the Downtown neighborhood, such as the Historic Courthouse and Fox Theater. In addition, the visual character of the Downtown neighborhood street grids that are oriented on an almost purely north-south, east-west grid.

There are no designated or eligible scenic corridors or vistas near the project site. The section of Interstate 280 (I-280) at the level of the City boundaries is considered a scenic highway per

[2] City of Redwood. 2010. Redwood City New General Plan. Draft EIR. https://www.redwoodcity.org/home/showpublisheddocument/5007/635782669602830000. Accessed December 11, 2025.

the California Scenic Highways Program.[3] I-280 is located approximately 3.3 miles southwest of the project site. Views of the site from I-280 are largely obstructed by existing topography.

Within Redwood City, El Camino Real retains a commercial character, but different segments have variations in their visual character. The central segment of the El Camino Real corridor at the level of the Sequoia High School campus is lined with relatively more dense commercial developments, narrow concrete sidewalks, and inconsistent street tree planting.

The Broadway corridor, near the project site, is comprised primarily of low commercial structures with linear street landscaping and mature trees lining the commercial roadway south of Downtown.

Scenic vistas within Redwood City are within the elevated hillside neighborhoods, located at approximately 2 mile southwest of the project site. Public views of scenic resources include the San Francisco Bay and its associated Baylands, sloughs, marshes, and the urbanized San Francisco Bay Peninsula.[4] These panoramic views encompass the project site.

The proposed project includes construction of a two-story classroom building near the athletic field and an outdoor classroom. Renovations are planned for the Main Building, multi-use room, locker rooms, stadium team room and storage room, and the student activity building. Additional improvements include interior upgrades; installation of photovoltaic panels; replacement of stadium lighting with LED fixtures; replacement of grass at the baseball and softball fields; restroom renovations; roof resurfacing; and exterior repainting. The proposed new classroom building and outdoor classroom would be located within the school boundaries. All proposed improvements would be located within the interior of the campus, set back from the site boundaries. Although the campus is visible from the hills to the southwest, 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. During construction, staging and construction activities would be fully onsite and would not be 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.

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 3.3 miles southwest of the project site. 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***.

[3] California Department of Transportation. California State Scenic Highway System Map. https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed November 25, 2025.
[4] City of Redwood. 2010. Redwood City New General Plan. Draft EIR. https://www.redwoodcity.org/home/showpublisheddocument/5007/635782669602830000. Accessed December 11, 2025.

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

No new significant night lighting is proposed as part of the project, except for the replacement of stadium lights with LED fixtures and installation of light fixtures along pedestrian pathways to enhance safety and visibility. The replacement of stadium lights with LED fixtures would reduce potential light and glare impacts because they provide more focused, directional illumination, minimize light spill and uplight, and are more energy-efficient than the existing fixtures. All new lighting would 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 project site is located in Redwood City and all proposed project improvements would occur within the Sequoia High School Campus boundaries. The project site is identified on the Farmland Mapping and Monitoring Program as Urban and Built-up Land,[5] defined as "Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This category of land is assigned to "residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation

[5] 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 December 10, 2025.

yards, cemeteries, airports, 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 San Francisco Bay Area (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)[6] 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 70 percent of the cancer risk from TACs (based on the Bay Area average).[7] 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

[6] Formerly known as the Bay Area Air Quality Management District (BAAQMD).
[7] CARB, *Summary: Diesel Particulate Matter Health Impacts*, Web: https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts#footnote1_7yob8j5. Accessed February 19, 2026.

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.[8]

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 $PM_{2.5}$.[9]

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 the residents in the single- and multi-family homes to the west, south, and east of the project site. There are also students at the Beresford Montessori, Sequoia Children's Center, and Acton Academy Silicon Valley to the north, North Star Academy and Our Lady of Mount Carmel School 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*.[10] 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 Plans show

[8] OEHHA, 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines, The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Office of Environmental Health Hazard Assessment. February.
[9] Bay Area Air District (Air District), 2022 CEQA Air Quality Guidelines, Appendix A, page 40, April 2023.
[10] Bay Area Air District (Air District), 2017. *Final 2017 Clean Air Plan.*

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 (see Impact below). This impact would be ***less than significant***.

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.

The project has committed, where feasible, to using construction equipment that meets U.S. EPA Tier 4 Interim emission standards for particulate matter or using alternatively-fueled equipment. 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 model construction inputs are included in **Appendix A.**

CalEEMod Inputs

Land Uses

The proposed project would be constructed in phases including construction of the new classroom building and the baseball field turf. Separate CalEEMod runs were conducted for each phase. Specific information (i.e., size, construction duration, etc.) about the expansion of the concrete pad for the outdoor arboretum classroom was not available at the time of this analysis, so a CalEEMod run was not created for this phase. The land uses for each phase were entered into CalEEMod, as described in **Table 3 – Summary of Project Land Use CalEEMod Input**.

TABLE 3 – SUMMARY OF PROJECT LAND USE CALEEMOD INPUT

Project Land Uses	Size	Units	Square Feet (sf)	Acreage
New Classroom Building (2027)				
High School	14	1,000-sf	14,000	1
Other Non-Asphalt Surfaces	34	1,000-sf	-	
Baseball Field Turf (2027)				
City Park	3.0	Acre	-	3.0

SOURCE: Illingworth & Rodkin, 2025.

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 activity 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 start dates for the new classroom building and the baseball field turf was estimated to be March 2027.[11] 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 new classroom building would be built out over a period of approximately 6 months, and the baseball field turf would be built out over a period of approximately 1 month, for a non-consecutive total of 6 months or 123 construction workdays.

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 soil imported and/or exported to the site, and the amount of concrete truck trips to and from the site. CalEEMod provides daily estimates of worker and vendor trips for each applicable phase. Daily haul trips for grading were developed by CalEEMod using the estimated soil import/export volumes. The amount of concrete 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 –**

[11] As a conservative assumption, the construction dates for these facilities have been estimated to occur simultaneously; however, the earliest start date of the baseball field turf is June 2027.

Construction Period Emissions, 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 shown in Table 4, predicted average daily project construction emissions, would not exceed the Air District significance thresholds.

The project construction period emissions from the new classroom building and the baseball field turf phases are well below significance threshold levels. As previously discussed, the outdoor arboretum classroom was not modeled and is not included in Table 4. However, the provided description indicates that the expansion would be minor and would generate a small amount of construction emissions. Therefore, even if emissions from construction of the outdoor arboretum classroom was included in Table 4, the total project construction period emissions would still be well below the Air District significance thresholds.

TABLE 4 – CONSTRUCTION PERIOD EMISSIONS

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Construction Emissions Total (Tons)				
2027 (new classroom building and the baseball field turf)	0.09	0.54	0.004	0.004
Average Daily Construction Emissions (pounds/day)				
2027 (123 construction workdays)	1.46	8.79	0.06	0.06
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 & Rodkin, 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 BMPs are implemented to reduce these emissions. Consistent with Air District-recommendations, the proposed project would implement Mitigation Measure AIR-1, which requires implementation of basic BMPs for reducing fugitive dust. With implementation of the 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 incorporated***.

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.

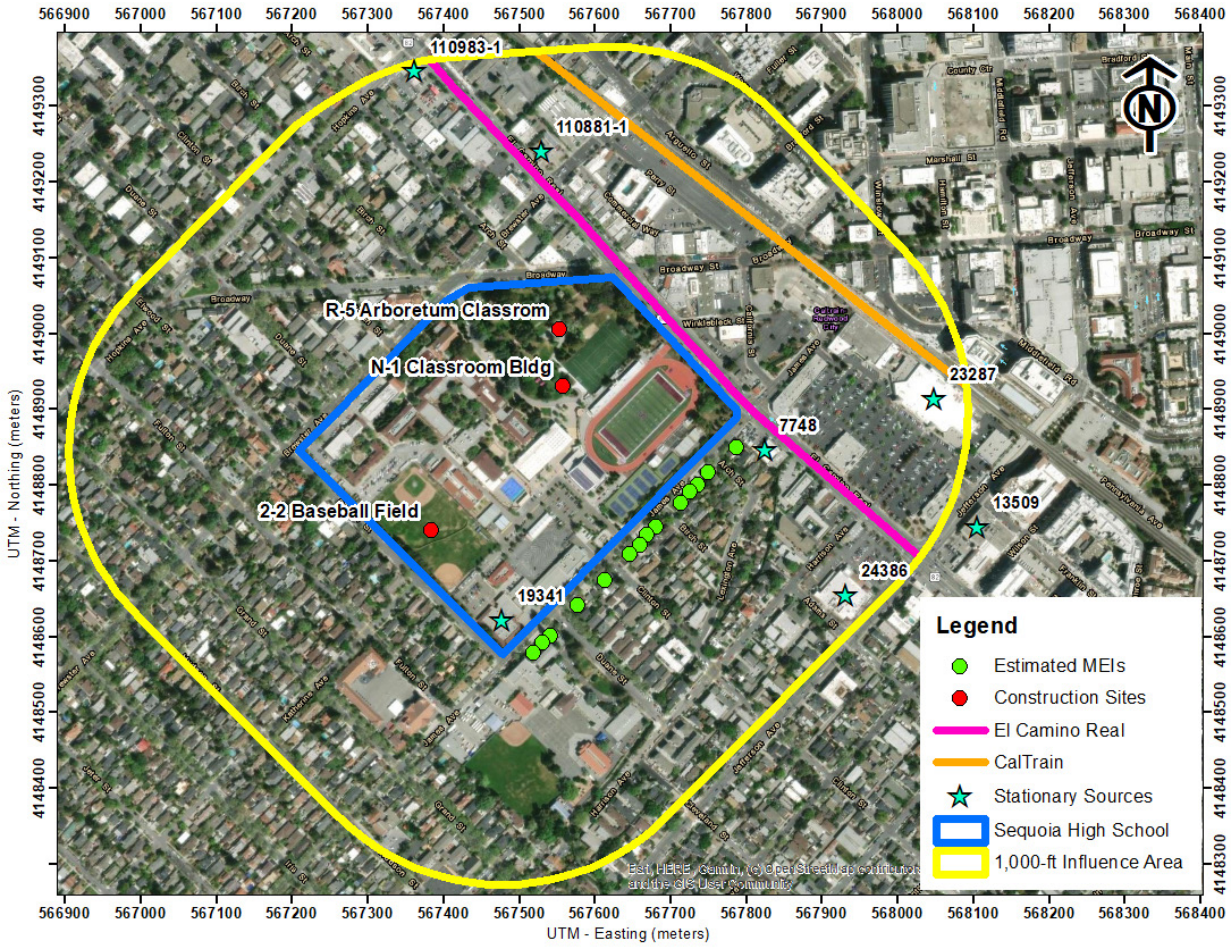
Project impact to existing sensitive receptors were addressed for temporary construction activities. There are also several sources of existing TACs and localized air pollutants in the vicinity of the project. The impact of existing sources of TACs was assessed in terms of the cumulative risk which includes 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 and school facilities near the site as shown in **Figure 4 – Location 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 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.

FIGURE 4 – LOCATIONS OF PROJECT MAXIMUM EXPOSED INDIVIDUAL RECEPTORS



The CalEEMod model provided total annual PM_{10} exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. Total DPM emissions were estimated to be less than 0.01 tons (8 pounds) and uncontrolled fugitive dust emissions ($PM_{2.5}$) were estimated to be 0.03 tons (57 pounds). As described in **Section 3.2.4, FMP Project Construction,** the District has committed, where feasible, to using construction equipment that meets U.S. EPA Tier 4 Interim emission standards for particulate matter or using alternatively-fueled equipment. This would apply to construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total. 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.

Although construction activities were not modeled for the expansion of the concrete pad for the outdoor arboretum classroom due to lack of phase information, construction of the outdoor arboretum classroom would also be subject to include Tier 4 Interim equipment and the Air District's basic BMPs, which would decrease construction health risk impacts.

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 – Impacts from Combined Sources at Estimated MEIs**.

TABLE 5 – 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
Air District Single-Source Threshold	*>10.0*	*>0.3*	*>1.0*
Exceed Threshold?	*No*	*No*	*No*
Cumulative Impacts			
Cumulative Roadways – Air District Screening GIS Data	<19.03	<0.47	<0.07
Cumulative Railways – Air District Screening GIS Data	<40.70	<0.03	<0.01
El Camino Martco (Facility ID #110983-1, Gas Dispensing Facility), MEIs at 2,100 feet.	0.02	-	<0.01
Kennedy Auto Body & Paint Shop (Facility ID #7748, Automotive Body, Paint, and Interior Repair and Maintenance), MEIs at 60 feet.	-	-	<0.01
Safeway Inc #305 (Facility ID #23287, Generator), MEIs at 680 feet	<0.01	-	-
Sequoia 110 High School District (Facility ID #19341, Generator), MEIs at 455 feet	<0.01	-	-
Speedway #5084 (Facility ID #110881-1, Gas Dispensing Facility), MEIs at 1,500 feet.	0.04	-	0.01
Whole Foods Market (Facility ID #24386, Generator), MEIs at 670 feet	<0.01	-	-
Cumulative Total	*<69.82*	*<0.80*	*<1.01*
Air District Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Exceed Threshold?	*No*	*No*	*No*

SOURCE: Illingworth & Rodkin, 2025.
Note: Maximally Exposed Individuals (MEIs)

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, railways, and stationary sources at the estimated MEIs. The local roadways, the nearby railways, and seven existing stationary sources of TACS were identified with the potential to affect the estimated MEIs. **Figure 4** 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 5.**

Local Roadways and Railways – Nearby Large Roadways and CalTrain/ Union Pacific Railroad (UPRR)

The project site is located in a mixed residential/commercial area near CalTrain/UPRR railways and arterial roadways including El Camino Real. Cancer risk, $PM_{2.5}$ concentrations, and hazard index (HI) associated with traffic and trains on the nearby roadways and railways were estimated using the Air District screening values provided via GIS data files (i.e., raster files).[12] The Air District raster files provide screening-level cancer risk, $PM_{2.5}$ concentrations, and HI for 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, 2021 train schedules and 2020 fuel consumption rates for rail activities. 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[13] or the planned electrification of Caltrain that began in the fall of 2024.[14] These screening values are conservative and 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.[15] Screening-level cancer risk, $PM_{2.5}$ concentration, and HI for the cumulative roadway and railway impacts at the estimated MEIs are listed in **Table 5**.

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 Source Screening Tool* on a GIS website.[16] The Air District GIS website identifies the location of nearby stationary sources and their estimated risk and hazard impacts and includes the 2023 emissions inventory data and adjustments to account for OEHHA guidance. Seven sources were identified using this tool; one "no data" source which was treated as a "generic case" for worst-case risk screening purposes, four generators, and two gasoline dispensing facilities (GDF).

The Air District GIS website provided the gas station throughput for the GDFs. The provided throughputs along with the distance between the receptors and the GDFs, as well as the

[12] Bay Area Air District, *Health Risk Screening and Modeling*, 2025. Web: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling
[13] Bay Area Air District, 2022 CEQA Air Quality Guidelines Appendix E, Section 9, April 2023.
[14] Caltrain Electrified Service Plan. URL: https://www.caltrain.com/projects/electrification/project-benefits/caltrain-electrified-service-plan
[15] Bay Area Air District, 2022 CEQA Air Quality Guidelines Appendix E, Sections 6 and 7, April 2023.
[16] Bay Area Air District, https://experience.arcgis.com/experience/89ba715c4dc7427f85e2d2fc5b8175ff/page/Stationary-Source-Screening-Tool

regions for the gas stations, were input into the CARB's *Gasoline Station Risk Screening Tool* to calculate the cancer risks and hazard indexes.

Typically, the Air District GIS website provides screening risks and hazard levels for the generators and no data/generic sources. For this assessment, the stationary source screening website showed that the remaining sources around the project site had risks and hazard levels of zero (0). However, each facility's total TAC emission inventories were available on the Air District's *Toxic Air Contaminant Special Reports and Emissions Inventories* website.[17] The emissions from each facility for the year 2023 (most recent data available on the tool) were entered into the Air District's *Health Risk Calculator with Distance Multipliers*.[18] to calculate the cancer risks and hazard indexes with distance adjustments. Health risk impacts from the stationary sources upon the estimated MEIs are reported in **Table 5**.

Summary of Cumulative Health Risk Impact at Estimated MEIs

Table 5 presents both the project and cumulative health risk impacts at the sensitive receptors most affected by construction (i.e., the estimated MEIs). As described in **Section 3.2.4, FMP Project Construction,** the District has committed where feasible to utilize construction equipment that meet U.S. EPA Tier 4 Interim emission standards for particulate matter, where construction equipment larger than 50 horsepower would be used at the site for more than two continuous days or 20 hours total. 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. Although the cumulative $PM_{2.5}$ concentration is at the threshold, it does not exceed it. As discussed above, the impact values in the table are screening levels, and if the project and existing TAC sources were to be modeled, the impacts levels would be less and well below the threshold levels. This impact would be ***less than significant with mitigation incorporated***.

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*.

[17] Bay Area Air District, *Toxic Air Contaminant Special Reports and Emissions Inventories (Year 2023)*, accessed October 30, 2025. Web: https://www.baaqmd.gov/en/about-air-quality/emission-inventory/toxic-air-contaminants
[18] Bay Area Air District, *Health Risk Screening and Modeling - Health Risk Calculator with Distance Multipliers*, accessed June 16, 2025. Web: https://www.baaqmd.gov/en/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools/health-risk-screening-and-modeling

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 review of relevant databases, literature, and field reconnaissance to document existing conditions and assess the potential for special-status species and regulated habitats on the project site.

The 2025 version of the California Department of Fish and Wildlife's (CDFW) California Natural Diversity Database (CNDDB) and the California Native Plant Society Inventory of Rare and Endangered Plants were reviewed to identify regional records of special-status species. Records were compiled and evaluated relative to the project site to determine potential occurrence and impact.

Field surveys conducted on July 3, 2025, documented habitats, plant communities, and wildlife, and assessed potential agency-regulated areas. Observed habitats were compared with the known requirements of special-status species to evaluate likelihood of occurrence and potential project impacts. Tree surveys on July 14 and 18, 2025, inventoried all trees near proposed construction or renovation areas.

A preliminary site assessment was also performed to identify potential waters of the U.S. or State. The results of these database reviews and field surveys form the basis for the biological resources analysis presented below.

Existing Landcover Types, Vegetation Communities, and Habitat

The project site is an active high school, predominantly covered by concrete hardscape. Vegetated areas are limited and consist of two plant communities: landscaped/anthropogenic vegetation throughout the campus and wetland vegetation along a portion of the roadside drainage ditch at the southeastern campus boundary along James Avenue.

Landscaped Communities

Vegetated areas on the project site consist primarily of anthropogenic or landscaped communities, including irrigated turf sports fields, grassy lawns, and planter areas adjacent to buildings and pathways. These areas contain a mix of native trees (e.g., coast live oak, valley oak, coast redwood) and ornamental species (e.g., blue jacaranda, olive, camphor, Japanese camellia, Nandina, boxwood). A large (approximately 6.3 acre) arboretum at the north end of the site contains both native trees, predominantly valley oak and coast redwood, and non-native trees such as blue gum eucalyptus, olive, and magnolia.

These anthropogenic and landscaped habitats support common, human-adapted wildlife, including American Crow, Black Phoebe, Common Raven, Bushtit, Dark-eyed Junco, and House Finch.

Wildlife Corridors

The project site is an active high school surrounded by heavily trafficked roads and high-density urban development. No wildlife corridors are present on or adjacent to the site. A roadside ditch along the southeastern boundary briefly connects to the City's storm drain system but does not function as a wildlife corridor due to its isolation and surrounding urbanization. There are no streams or other aquatic features that provide connectivity for wildlife.

Special-Status Species

As described above, 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.

- **Special-Status Plants:** No special-status plants have been recorded on or immediately adjacent to the project site. According to the California Native Plant Society Inventory and the CDFW CNDDB, 16 special-status plant species are known in the broader project area (**Appendix B**). Most of these species occur in specialized habitats, such as chaparral, coastal prairie/scrub, serpentine grasslands, vernal pools, and freshwater or coastal salt marshes, that are not present on the site. Given the site's fully developed and landscaped conditions, the occurrence of special-status plants is highly unlikely.

- **Special-Status Animals:** No special-status animals have been recorded on or immediately adjacent to the project site. However, 15 special-status animal species are known to occur in the surrounding area (**Appendix B**). Given the site's largely developed conditions as an

active high school, only the White-tailed Kite has potential to occur. Additionally, the recently proposed species Crotch's Bumble Bee is discussed in further detail below.

- The **White-tailed Kite** (*Elanus caeruleus*) The White-tailed Kite is a fully protected species under California law and the federal Migratory Bird Treaty Act. It typically forages in grasslands, marshes, or fields near dense trees or shrubs for nesting. The project site contains several large trees, particularly in the northern arboretum, that could serve as nesting habitat. Recent sightings in the region indicate the species may occur nearby.
- **Crotch's Bumble Bee** (*Bombus crotchii*) is a candidate species with no current state or federal listing. Crotch's Bumble Bee is a candidate for state endangered or threatened status. Historically widespread in southern California, its range has declined due to urbanization and agriculture. It nests underground and forages on a variety of open flowers from spring through fall. There are no records within three miles of the project site. However, recent sightings have been documented within 10 miles. Although the site is largely developed, landscaped and weedy areas provide marginal foraging habitat.

Nesting Birds

Although unlikely due to the high level of disturbance on the project site and surrounding urban development, trees throughout the site could provide nesting habitat for urban-adapted songbirds such as American Crow, Anna's Hummingbird, and Bushtit, as well as raptors including White-tailed Kite, Red-tailed Hawk, and Red-shouldered Hawk, particularly in the arboretum near the northern boundary and the east corner of the site. Buildings also provide nesting sites for songbirds such as Black Phoebe, House Sparrow, and House Finch, which nest under eaves, on lighting structures, or in cavities. These birds are protected under the Migratory Bird Treaty Act. While adult birds can usually avoid direct harm, eggs, nestlings, and young are vulnerable to construction disturbances, including noise and vibrations.

Sensitive and Regulated Plant Communities and Habitats

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 the U.S. Fish and Wildlife Service (USFWS).

Wetlands

There are no wetlands at the project site. A roadside ditch flows approximately 515 feet northeast along James Avenue, then angles north onto the project site, running about 80 feet through a landscaped area east of the football field. The ditch then enters a 48-inch corrugated metal pipe with a concrete headwall near the intersection of El Camino Real and James Avenue. The ditch is fed by nuisance water and stormwater runoff from Redwood City's storm drain system. Flows are conveyed offsite through the storm drain system to Redwood Creek and ultimately to San Francisco Bay.

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?

As described above, no special-status plants have been recorded on or immediately adjacent to the project site. Of the 15 special-status wildlife species that have been documented within the project region, only the White-tailed Kite and the recently added Crotch's Bumble Bee have a potential to occur.

Construction of the proposed project could potentially impact the nesting White-tailed Kite, a species protected by the California Endangered Species Act. Potential impacts to this species from the proposed project include disturbance to nesting birds and possibly death of adults and/or young. This potential project impact would be significant. The proposed project would implement **Mitigation Measure BIO-1a: Pre-Construction Surveys for Nesting Birds** to reduce this impact to a ***less-than-significant*** level.

Crotch's Bumble Bee is a candidate for state listing as endangered or threatened. It has no federal status. The project site is almost entirely developed and surrounded by high-density urban development. However, the landscaping and ruderal vegetation, particularly within the arboretum at the north end of the project site, provides floral resources for this species and any unimproved ground surface (i.e., not paved or hardscaped) provides nesting opportunities. The project site occurs within this species' current known range; there are recent records in the surrounding area on Bumble Bee Watch, and this is mobile species. 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-1b: Pre-Construction Surveys for Crotch's Bumble Bee** would reduce this impact to a ***less-than-significant*** level.

Nesting Birds. In addition to the White-tailed Kite discussed above, other birds and raptors could potentially nest at the project site, particularly in the arboretum near the northern boundary and the east corner of the site. These species include the American Crow, Anna's Hummingbird, and Bushtit, as well as raptors including the Red-tailed Hawk, and Red-shouldered Hawk. These species are protected under the Migratory Bird Treaty Act and their eggs and young are protected under California Fish and Game Code. Project-related activities could result in disturbance to nesting birds or, in some cases, injury or mortality to adults or young. This potential project impact on these birds species during construction would be significant. The proposed project would implement **Mitigation Measure BIO-1a**, detailed below, which require a pre-construction survey to reduce impact on nesting birds.

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

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

To avoid impacts to nesting birds, a nesting bird survey shall be conducted within 7 days prior to commencing construction work (new construction or renovations of building exteriors) or tree removal if this work would commence between February 1st and August 31st. The nesting bird survey shall include an examination of all buildings to be affected by exterior construction activities and all trees within 200 feet of any of the work areas (i.e., within a zone of influence of

nesting birds), not just trees slated for removal or buildings to be renovated or constructed.

If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist or a qualified ornithologist should establish a temporary protective nest buffer around the nest(s) to protect the nesting bird from harm while construction is ongoing. The nest buffer shall be staked with orange construction fencing. The buffer shall be of sufficient size to protect the nesting site from construction-related disturbance and shall be established by a qualified ornithologist or qualified biologist with extensive experience working with nesting birds near and on construction sites. Typically, adequate nesting buffers are 50 feet from the nest site or nest tree dripline for small birds and up to 300 feet for sensitive nesting birds that include several raptor species known from the region (e.g., White-tailed Kite).

No construction or earth-moving activity shall occur within any established nest protection buffer prior to September 1 unless it is determined by a qualified ornithologist/biologist that the nesting cycle is complete. The qualified biologist shall conduct follow-up surveys, as needed, to confirm nest status. The nesting cycle shall be considered complete when the young have fledged and are capable of flight, or when it is otherwise confirmed that the nest is no longer active. Upon verification that nesting has concluded, the temporary nest protection buffers shall be removed, and construction may resume within the previously restricted areas.

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

If work occurs during the flying season (March through August), a qualified entomologist shall conduct preconstruction surveys for active bumble bee colonies in all vegetated areas prior to the start of construction. Surveys shall be conducted when the species is most likely to be active: on sunny days with temperatures above 60 degrees Fahrenheit, wind speeds below 8 miles per hour, and between 2 hours after sunrise and 3 hours before sunset. The entomologist shall conduct transect surveys to detect foraging bumble bees and underground nests, using visual aids such as binoculars as needed.

If no Crotch's Bumble Bees or potential Crotch's Bumble Bees are detected or other CDFW candidate bumble bees, no further measures are required. If potential Crotch's Bumble Bees 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 and identify bumble bees. If protected bumble bee nests are found, a plan to protect bumble bee nests and individuals to ensure no take of Crotch's Bumble Bees or other protected bumble bees shall be developed by a qualified entomologist in consultation with the District. The District shall approve the plan prior to implementation.

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 have any wetland features. Therefore, the project would have ***no impact*** on state of 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?

There are no wildlife corridors at the project site, and the proposed project would not interfere with native wildlife movement. The project site is an anthropogenic habitat that is surrounded by high-density urban residential and commercial development and does not serve as a wildlife corridor. In addition, the project site has no aquatic features such as a stream or river that would serve as a wildlife movement corridor. The roadside ditch at the southeastern campus boundary along James Avenue would not serve as a wildlife corridor as it only briefly daylights to and from underground pipes associated with the City's storm drain system on each end along a heavily trafficked road (James Avenue) between the school and the high-density residential development to the east. For these reasons, the project site does not support native resident or migratory wildlife movement, established corridors, or nursery sites. Therefore, the proposed project would have ***no 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?

Based on a tree survey conducted at the project site on August 4, 2025, a total of 37 tree species were identified at the project site.[19] Of the 37 species, 30 are not native to California. Several trees have a large single trunk with a circumference of 38 inches or more when measured at any point between six inches and thirty-six inches above ground level. Most of these large trees are close to the proposed new classroom building and the proposed outdoor classroom in the arboretum; however, a handful of large trees are adjacent to existing buildings proposed for exterior renovations or proposed infrastructure or sports facility improvement areas.

The proposed project could result in the removal or damage to some of the trees located near the work areas, such as the new classroom building and outdoor classroom. The proposed project would be required to comply with the District's SCM-2: Biological Resources, which requires tree protection and replacements of trees to be removed. As noted under SCM-2, 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 damage of protected trees as defined under SCM-2 would be considered a potentially significant adverse impact. In compliance with the requirement of SCM-2, the proposed project would implement **Mitigation Measure BIO-2: Tree Protection Plan**, outlined below, to reduce the project impact on protected trees. **Mitigation Measure**

[19] Monks & Associates. 2025. Letter Report: Tree Inventory Report. August 4.

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 the commencement of construction, all native trees with a diameter at breast height (DBH) of 38 inches or greater and located within 50 feet of proposed work areas shall be evaluated for preservation.

For trees identified for preservation, a qualified arborist shall establish a Tree Protection Zone (TPZ) at a minimum extending to the dripline, or as otherwise recommended by the arborist to protect the critical root zone. Protective fencing shall be installed prior to any ground-disturbing activities and shall remain in place for the duration of construction. No grading, trenching, soil compaction, material storage, vehicle access, or other construction-related disturbance shall occur within the TPZ unless specifically approved and supervised by the arborist.

If any qualifying native tree (DBH ≥ 38 inches) within or within 50 feet of the work area cannot feasibly be preserved, it shall be replaced at a minimum 1:1 ratio with native tree species appropriate to the region. Replacement trees shall be of a size and type consistent with the District standards and shall be maintained for a minimum establishment period.

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. There are no Habitat Conservation Plans or Natural Community Conservation Plans in force in San Mateo County other than the San Bruno Mountain HCP which does not include the project site. Therefore, the project would not conflict with any such plans. ***No impact*** would occur.

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 Sequoia High School campus.[20]

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 approximately 50 tribelets and practiced hunting and gathering with careful land management. Their diet centered on acorns, supplemented by roots, berries, other vegetation, seafood, and game.

[20] Brunzell Historical. 2025. Cultural Resources Assessment Report. Sequoia High School. November.

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.

Redwood City

The Redwood City area was originally inhabited by the Muwekma Ohlone. Following California statehood in 1850, land claims associated with Rancho de las Pulgas were contested; attorney

Simon M. Mezes successfully defended the Arguello family's claim and, in compensation, received a portion of the rancho that later became downtown Redwood City. The City was incorporated in 1867 and has served as the San Mateo County seat since 1856.

During the early years of statehood, Redwood City developed a strong lumber industry supported by abundant redwood forests and an active shipping port. The completion of the San Francisco–San Jose passenger railroad in 1864 further stimulated growth, making the community an attractive residential location for affluent San Francisco businessmen. Although the lumber industry declined by 1900, the waterfront remained an important asset. The port played a strategic role during World War I and World War II as a U.S. Navy freight facility. Post-war suburban expansion led to significant population growth, increasing from approximately 25,500 residents after World War II to more than 55,000 by 1970. From the 1960s through 1985, the waterfront was also home to Marine World. With the rise of Silicon Valley in the 1980s and 1990s, the local economy shifted toward technology and software industries. As of 2023, Redwood City's population was approximately 81,000.

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 Union 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 Union 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.

Sequoia High School

The chronology that follows documents the development and use of the Sequoia High School Historic District, including alterations made since its listing on the National Register of Historic Places (NRHP) in 1995. It is based primarily on the NRHP nomination prepared by Kent Seavey in 1994 and supplemented by historic aerial photographs, maps, newspapers, and project plans and as-built drawings provided by the Sequoia Union High School District (SUHSD).

Established in 1895 as a preparatory school for Stanford University, Sequoia High School was the first secondary school between San Francisco and Santa Clara. The school opened with 53 students, Principal David A. Curry, and three instructors, holding classes in an existing building. In 1904, SUHSD constructed a new facility designed by architect Alfred I. Coffey. By 1920, the District acquired the present campus site—formerly a landscaped residential estate owned by William Dingee and later Albert and Georgia Pissis—in anticipation of constructing a larger replacement high school. Coffey, in partnership with Carl Werner, designed the new campus. Constructed in 1923 and 1924, the earliest extant buildings are the first Spanish Revival public structures in Redwood City and reflect the widespread popularity of Spanish-inspired architecture during that period. Principal A.C. Argo, who also served as Superintendent of SUHSD, oversaw construction and the transition to the new campus.

Campus Architecture

Architecture Program (1923–1923)

Werner is credited with shaping Sequoia High School's architectural character, while Coffey developed the programmatic layout, with administrators and faculty contributing to functional planning. Constructed at a cost of $500,000, the campus incorporated modern features for its time, including classroom telephones, loudspeakers, and an electric bell system. Designed in accordance with contemporary best practices in educational planning, the reinforced concrete buildings were arranged by function, with long wings and expansive windows oriented toward landscaped grounds. The design emphasized fire and earthquake resistance, accommodated

future expansion up to 2,000 students, and preserved mature trees to create a sense of permanence. Rather than fronting the street, the buildings were set back more than 700 feet from El Camino Real, oriented to highlight an existing grove and buffer traffic noise.

Dedicated in May 1924 with 345 students enrolled, the new campus initially comprised the Main Building (originally L-shaped), the Auditorium (Carrington Hall), and a gymnasium (no longer extant), linked by arcades. The library was housed in the Main Building overlooking the Tea Garden. A former carriage house was retained for mechanical arts, and additional estate-era structures remained on site. Athletic facilities included indoor and outdoor pools and sports fields generally in their present locations.

As the region's only secondary school, Sequoia High School quickly became a leading institution, ranking among California's top high schools between 1923 and 1945. Its reputation has been attributed to Principal A.C. Argo, a strong faculty, and ties to Stanford University. Argo promoted student stewardship of the landscaped campus, integrating gardening into practical education. The school also gained distinction through its journalism program and the long tenure of music director Otis M. Carrington, whose original operettas achieved national circulation.

Expansion began shortly after opening. Between 1927 and 1929, the girls gymnasium (Gymnasium 3), cafeteria/boiler room (now student activity center), music building addition, and a west wing to the Main Building were constructed, forming a U-shaped plan that enclosed the Tea Garden courtyard. Designed by Coffey and Werner, these additions were architecturally consistent with the original Spanish Revival scheme and connected by arcades. By 1929, the core campus plan was substantially complete, with primary buildings clustered around the arboretum and Tea Garden, and vocational facilities located more discreetly to the rear.

Pragmatic Expansion (1930–1960)

The machine shop was constructed in 1932 southwest of the mechanical arts building within the vocational area of campus. In 1935, a structural steel truss system was added to the Main Building to improve seismic performance. A new library, designed by San Francisco architects Blanchard and Maher, was added to the rear of the Main Building adjacent to the Tea Garden in 1939. In 1940, a wood shop funded in part by the Works Progress Administration expanded the vocational complex, and the El Camino Real gate—also designed by Blanchard and Maher—was completed in 1941 (rehabilitated in 1991). These additions were linked to the original buildings by arcades. Estate-era wooden structures retained in 1923 were relocated or removed by 1945.

Postwar development continued with construction of an auto shop (1948), the commercial arts wing designed by Blanchard and Maher (1949), and a related electrical and sheet metal shop building. Beginning in the 1940s, trees and landscaping at the southern end of campus were cleared to accommodate additional facilities, including home and garden classrooms, a district bus barn, and a greenhouse. A district office building was added near James Avenue in 1957, followed by related support facilities. Gymnasium 2 was constructed in 1958, and the Lenkurt Science Lab (LL Wing), partially funded by Lenkurt Electric Company, replaced the former carriage house to support electronics training. These late-1950s buildings reflected a Modernist architectural approach rather than the campus's original Spanish Colonial Revival style. In 1960, a new swimming pool replaced the 1928 pool, and the original gymnasium was demolished.

Stability and Repair (1961–1989)

A multi-purpose room was constructed circa 1961 near the site of the original gym; records regarding its design are not available. This building was later demolished and replaced. Significant modifications to historic buildings during this period included replacement of the girls gymnasium first-floor windows with aluminum sliding sash (1961) and enclosure of its second-story windows (1970). Main Building windows were likely replaced with aluminum sash around 1961, as photographs from the 1966 yearbook show updated windows. The cafeteria sustained minor alterations in 1961 following fire damage. No major projects occurred between 1962 and 1980. During the 1980s, seismic upgrades were implemented, clay tile roofs were replaced with composition shingles, and decorative urns on the tower corners were removed.

Modernization (1990–2025)

Between 1991 and 2002, the campus underwent significant construction and modernization. The swimming pool between the gymnasiums was paved over to create the main quad, with a new pool built southeast of the girls gymnasium. In 1994, the U-shaped B Wing South replaced the electrical and sheet metal shop. That same year, Sequoia High School alumni funded the campus nomination to the NRHP, and in 1995 it was formally listed as the Sequoia Union High School Historic District with broad support from preservation advocates, SUHSD leadership, local officials, and alumni.

From 1995 to 2001, the 1961 flat-roofed multi-purpose room was remodeled (or possibly replaced) to harmonize with the Main Building, featuring arched windows and pitched roofs. It was connected to the Main Building via a two-story hyphen with an open arcade on the first floor and an enclosed second floor. Subsequent improvements included the 2005 transformation of the 1949 commercial arts wing with a second-story addition and Spanish Revival-style façade; the 2007 ceramic studio, attached to Lenkurt Lab and designed to match the nearby orchestra room addition; classroom modernizations in 2008; a new gymnasium (Gymnasium 1) near the football field in 2009; the 2017 A Wing addition for classrooms; and portable classrooms (P Wings) erected in 2019.

Archival Search

A records search was conducted at the Northwest Information Center (NWIC) and the Built Environment Resource Directory (BERD) to identify known cultural resources within one mile of the project site. Data indicate that 105 cultural resource studies have been conducted in the area, documenting 80 resources, including seven prehistoric and 73 historic-period sites. The most significant resource is the project site itself, Sequoia High School, listed on the NRHP as a historic district. Contributing elements include the Main Building, auditorium, girls' gymnasium, cafeteria, machine shop, Brewster Avenue gate, and El Camino Real entrance, while the auto shop, boys gymnasium, Lenkurt Science Lab, and swimming pool are non-contributing.

In addition to CHRIS record search materials, including the 1994 NRHP nomination form, drawings and plans from Sequoia High School renovation projects were reviewed. Additional research was conducted using primary and secondary sources from the San Mateo County Historical Association and online resources, including historical newspapers and genealogical databases.

Cultural Resources

Site Surveys

Archaeological Survey

An archaeological pedestrian survey of the project site was conducted on April 8, 2025, covering the entire area. All soil exposures were systematically examined for evidence of cultural resources, and photographs were taken at multiple locations. Surface visibility averaged less than 10 percent, and extensive ground disturbances, resulting from building construction, landscaping, paving, and utility installation, were observed throughout the site. No archaeological resources were identified during the survey, and the high level of disturbance indicates a low potential for significant buried cultural resources.

Built Environment Survey

A built environment survey of the project site was conducted on July 2, 2025, to document current conditions of the Historic District. All visible elevations of campus buildings, including those identified in the 1994 NRHP nomination and post-1995 alterations, were inspected and photographed, along with landscaping, sports fields, tennis courts, the swimming pool, and the surrounding neighborhood. The survey aimed to assess the Historic District's integrity, identify its character-defining features, and provide information for evaluating potential impacts to historic resources.

Historical Resources Status

The project site was listed on the NRHP as the Sequoia Union High School Historic District in 1995 and is also included on the California Register of Historical Resources (CRHR), qualifying as a historical resource under CEQA. The following summarizes the nomination to clarify which campus buildings are part of the Historic District.

The 1994 NRHP nomination form defines the Sequoia Union High School Historic District as encompassing the full 35-acre campus, excluding the 5-acre area around the district offices at the southern corner. Contributors are features within the district that convey its historical significance from the period of significance, while non-contributors lack association with that period or do not retain sufficient integrity to convey their significance.

The Historic District contributors listed in 1995 include:

- **Main Building** – original 1923 structure with additions from 1928, 1939, and 1949/2005
- **Auditorium (Carrington Hall)** – 1923 original and 1928–1929 Music Building
- **Girls Gymnasium (Gymnasium 3)** – 1928–1929
- **Cafeteria (student activity center)** – 1928–1929
- **Machine Shop** – 1932, with 1940 Wood Shop Addition
- **Brewster Avenue Gate** – 1924
- **El Camino Real Entrance** – 1941

Buildings constructed outside the 1923–1945 period of significance (except the 1949 Main Building addition) are classified as non-contributors. The 1994 nomination provided only limited discussion of interiors; although the auditorium retains its original proscenium arch and possibly other decorative features, interiors were not considered character-defining.

Outdoor sports facilities—including the football field, track, tennis courts, and baseball field—were also addressed in the nomination. While the track and football field remain in their original locations, other courts and fields have been repeatedly altered over the decades. As a result, the nomination concluded that outdoor sports facilities are not contributors to the Historic District.

The Brewster Avenue Gate and El Camino Real entrance are listed as contributors in the NRHP nomination. Other landscape features, while not explicitly listed, are identified as character-defining, including the parklike setting with mature trees near buildings and the wooded northern corner of campus. The nomination highlights the "wooded appearance of the campus with its tree cover of mature native and introduced species" as a feature preserved from the property's prior use as a residential estate. The Tea Garden behind the Main Building, developed before the school's construction and visible from surrounding classrooms, is also recognized for its historical significance and enduring association with the school's traditions and alumni, despite changes over time.

NRHP and CRHR eligibility requires that a resource meet at least one significance criterion. The Sequoia Union High School Historic District was listed on the NRHP in 1995 under Criteria A, B, and C, and, as an NRHP-listed property, qualifies as a historical resource under CEQA. While 1994 nominations did not require detailed evaluations of each criterion, the NRHP nomination provides supporting arguments as follows:

- **Criterion A:** Recognized for educational distinction under A.C. Argo between 1923 and 1945.
- **Criterion B:** Associated with notable music educator Otis B. Carrington.
- **Criterion C:** Exemplifies Spanish Colonial Revival architecture in California schools, notable as the first public use of the style in Redwood City, influencing subsequent public buildings. Designed by prominent architects Alfred I. Coffey and Carl Werner, the campus features a decorative Main Building and auditorium, innovative reinforced concrete construction, rambling layouts for improved fire safety, and preserved mature trees and landscaping that contribute to a parklike campus setting.
- **Criterion D:** Not applied; the district was not nominated for archaeological significance.

Buildings constructed outside the 1923–1945 period (except the 1949 Main Building addition) are considered non-contributors.

Historical Significance of Individual Campus Buildings

District Noncontributor Buildings Constructed Before 1975

The Lenkurt Science Lab (LL Wing) and Gym 2, both constructed in 1958, fall outside the Historic District's period of significance and are non-contributors. They do not conform to the architectural character of the district and would not qualify as contributors if the district were reevaluated, despite being over 50 years old.

The Lenkurt Science Lab, funded by a local electronics company, played a pioneering role in high school technological education, influencing similar programs statewide and nationally. However, the building lacks integrity due to multiple façade alterations, added entrances and

ramps, and the 2007 ceramic studio addition, which is stylistically incompatible. As a result, it cannot convey its original significance.

Gymnasium 2, a utilitarian concrete masonry structure, has served as a sports facility since its construction. It lacks historical or architectural distinction and does not conform to the original campus design.

Neither building qualifies for individual historic listing, and is not a historical resource under CEQA.

Buildings Contributors to the Historic District

None of the Historic District contributors were evaluated for individual significance in the 1994 nomination, and none are individually listed on the NRHP. No subsequent studies have assessed individual eligibility, and formal evaluation or nomination of contributors is beyond the scope of this study.

Documentation of the existing campus indicates that the Main Building's original façade and the adjacent auditorium are the most architecturally significant elements. Spanish Revival features, including richly ornamented entrances, the campanile tower, and other character-defining details, are concentrated on these primary façades. These key buildings were sited as a cluster facing the parklike arboretum, along with the two Broadway gates, to emphasize the school's prominence. Late-1920s additions, while less elaborate, were integrated through connecting arcades and designed in massing and materials compatible with the original buildings, so as not to detract from their architectural distinction.

The second phase of campus construction introduced simpler buildings with minimal ornamentation. The vocational training area, although included in the Historic District, was not part of the Coffey and Werner architectural program. Initially composed of reused wood-frame buildings, it was located behind the main academic and administrative zone, out of view from campus entrances and the street. Later replacement buildings incorporated compatible materials such as stucco but were not always designed by the original architects and are less architecturally significant, with their importance deriving primarily from historical use rather than design.

The east wing of the Main Building and the original section of the auditorium would have individually qualified for NRHP listing under Criterion C due to their architectural significance. However, both have been expanded with additions that, while compatible, are less architecturally distinguished. The Main Building now consists of six connected wings constructed over 80 years, and the auditorium's original section comprises only roughly half of the current structure. The campus's oldest and most ornamented elements are thus embedded within buildings containing newer, less significant sections, and individual façades or wings cannot be listed separately. Accordingly, none of the buildings within the Historic District appear to be individually eligible for NRHP listing.

Campus' Zones of Historic Significance

The entire 35-acre campus falls within the Historic District, and none of its historic-era buildings are individually eligible for NRHP listing for the reasons discussed above. However, district contributors and character-defining features are concentrated in the northwest portion of the

campus. The Historic District can be divided into primary, secondary, and tertiary zones, as shown in the site plan in **Figure 5 – Zones of Historic Significance.**

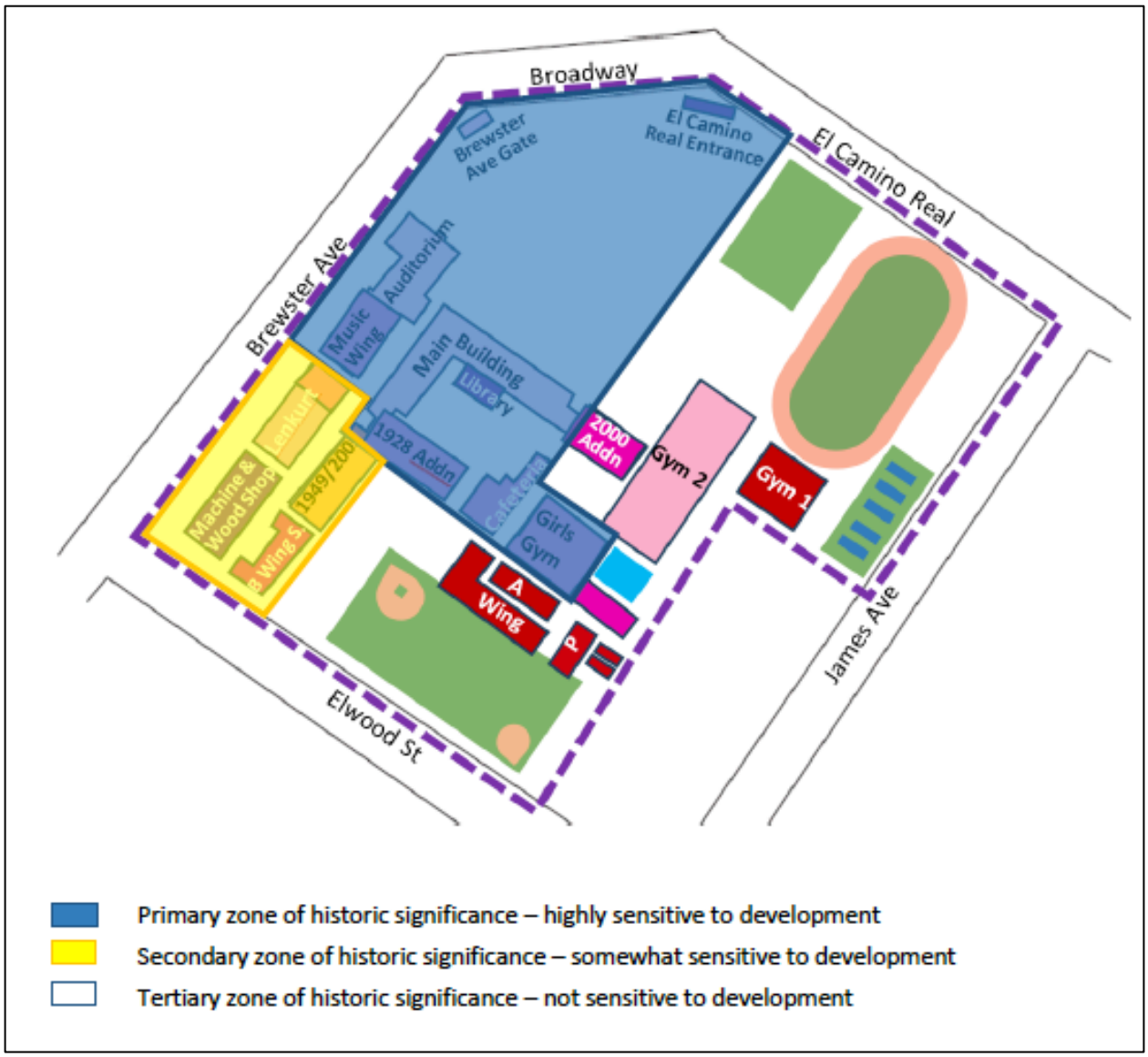


FIGURE 5
Zones of Historic Significance
Sequoia High School Facilities Master Plan

The primary zone (**Figure 5**) includes the most significant original buildings, all pre-1930 structures, and key landscape features documented in the 1994 nomination. This area contains the district's architectural focal points and character-defining landscapes. Exterior alterations within this zone, if necessary, they must conform to the Secretary of the Interior's Standards for Rehabilitation.

The secondary zone (**Figure 5**) corresponds to the former vocational training area and includes only two contributors: the Machine/Wood Shop and the 1949 Main Building addition. These

buildings lack the architectural distinction of the pre-1930 structures, and the zone contains no other significant façades or historic landscapes. Major alterations to the buildings should be avoided, but the historic setting is less sensitive, and changes to non-contributing buildings are unlikely to adversely affect the district.

The tertiary zone (**Figure 5**), comprising roughly half the campus, contains no contributors and is minimally sensitive. New construction, alterations, or sports facilities generally would not negatively impact the Historic District.

Integrity

Campus Alterations

As noted above, the property underwent multiple alterations between the end of the period of significance (1945) and the NRHP nomination (1994). It was formally listed on the NRHP in 1995, indicating that it retained historic integrity at that time. The following discussion focuses on changes made between 1995 and 2025.

Since the period of significance (1923–1945), many additions and alterations have occurred at Sequoia High School. When nominated in 1994, contributing buildings and character-defining landscapes retained integrity, and later construction was sited behind contributors or outside the primary zone, minimizing impacts to the historic setting. Late-1940s and 1950s buildings were Modernist and sited to avoid overshadowing pre-1930 structures.

Beginning in the 1990s, several additions and new buildings incorporated Spanish Revival elements to complement the Historic District, including B Wing South (1994), the multi-purpose room (c. 2000), the commercial arts wing remodel (2005), the ceramic studio (2007), and the A wing (2017). While generally compatible in materials, scale, and massing, some—particularly the multi-purpose room, B wing south, the commercial arts wing, and the ceramic studio—partially create a false sense of historical development by closely replicating historic features, with the commercial arts remodel representing the most significant loss of integrity.

Minor alterations to historic contributors, such as replacement of clay tile vents and light fixtures, have occurred but are limited in scope. More recent non-historic construction, including athletic facilities, portable classrooms, and a new gymnasium, is clearly distinguishable, sited in less sensitive areas, and does not negatively impact the Historic District.

Historic District Integrity

Historic integrity reflects a property's ability to convey its significance through physical characteristics from its period of significance. It is assessed through seven aspects: location, design, setting, materials, workmanship, feeling, and association.

The Sequoia Union High School Historic District retains integrity across all seven aspects.

- **Location** is preserved, as none of the seven contributing buildings or gates have been moved.
- **Design** remains largely intact, with pre-1930 buildings retaining Spanish Revival features, deep setbacks, long wings, and ornamental details. Alterations to the 1949 Main Building wing and Brewster Avenue Gate sconces have minimally affected overall integrity.

- **Setting** continues to reflect the historic campus plan, with key landscapes such as the Arboretum and Tea Garden preserved; new buildings are generally sited outside primary zones, minimizing impacts.
- **Materials** remain largely original, with minor losses in the 1949 wing, machine shop, and Brewster Gate.
- **Workmanship** is preserved in the Main Building and auditorium.
- **Feeling** reflects the campus's 1920s–1940s aesthetic.
- **Association** is maintained through continued educational use and connection to designers Coffey and Werner.

Despite some alterations, the district retains sufficient historic fabric to convey its Spanish Revival identity and 1920s-era character. As an NRHP-listed property with retained integrity, the Historic District qualifies as a historical resource under CEQA.

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

The proposed project at Sequoia High School includes construction of a new two-story classroom building near the athletic field with associated site improvements and a new quad; expansion of the arboretum concrete pad to create an outdoor classroom with seating, shade, and power; renovations to the Main Building, including administrative reconfiguration, bell tower seismic retrofit, roofing and window replacement, HVAC upgrades, restroom and corridor improvements; upgrades to the multi-purpose room with operable glazed partitions; interior renovations to the cafeteria (student activity building) and auditorium; and improvements to locker rooms, stadium team and storage rooms, as well as miscellaneous site improvements including photovoltaic panels, stadium light replacement, and conversion of athletic fields to artificial turf.

The Historic District is listed on the NRHP and CRHR and qualifies as a historical resource under CEQA. The district retains integrity in location, design, setting, materials, workmanship, feeling, and association. Primary historic contributors and character-defining features are concentrated in the northwest part of campus (primary zone), while secondary and tertiary zones contain fewer or non-contributing buildings and features.

<u>New Classroom Building and Associated Site Improvements</u>

The proposed new classroom building and associated site improvements would be located in the tertiary zone, away from primary historic contributors and character-defining landscapes. Construction would not physically alter or demolish historic buildings or key landscape features. Because no historic contributors would be altered and the design is intended to be compatible with the campus context, this project element is not expected to result in a significant impact to historic resources. Therefore, the impact from the new classroom building and associated site improvements would be ***less than significant***.

<u>Arboretum Outdoor Classroom</u>

The arboretum is a character-defining landscape feature within the primary zone of the Historic District. Expansion of the existing concrete pad could potentially alter or remove mature trees or other historic landscape elements, which could degrade the historic setting and character of the district. This would be a potentially significant impact to historic resources under CEQA. The

proposed project would implement **Mitigation Measure CR-1: Historic Resources Design Review and Compliance**, outlined below, which would require review of the proposed design by a qualified architectural historian or historical preservation professional who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61). With implementation of **Mitigation Measure CR-1**, construction of the outdoor arboretum classroom would be ***less than significant with mitigation***.

Renovations to Contributing Buildings

Proposed renovations to the Main Building, multi-purpose room, cafeteria, and auditorium include interior improvements, administrative reconfigurations, HVAC upgrades, and other functional upgrades. Interior alterations are generally not character-defining and are not expected to result in adverse effects. Exterior alterations, such as roofing and window replacement or minor façade changes, could alter character-defining features and therefore represent a potentially significant impact to historic resources. Implementation of **Mitigation Measure CR-1** would ensure all exterior alterations are reviewed for compliance with the Secretary of the Interior's Standards, reducing potential impacts to ***less-than-significant*** level.

Other Non-Contributing Facilities and Miscellaneous Improvements

Renovations or improvements to non-contributing facilities, including locker rooms, stadium team and storage rooms, installation of photovoltaic panels, replacement of stadium lights, and conversion of athletic fields to artificial turf, would be located outside the primary zone. These improvements would not alter historic contributors or character-defining features and therefore would result in a ***less-than-significant impact*** on historic resources.

Mitigation Measure CR-1: Historic Resources Design Review and Compliance

Prior to approval of final design plans and issuance of any building permits for the outdoor classroom (and any site work within the primary historic district zone), the District shall retain a qualified architectural historian or historical preservation professional who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) in architectural history or historic preservation. This professional shall implement the following:

1. **Arboretum Outdoor Classroom:**
    a. Review all plans, elevations, materials, and location to identify potential impacts to character-defining landscape features.
    b. Provide recommendations to avoid removal, alteration, or disturbance of historically significant landscape features, including plantings, pathways, hardscape, and view corridors.
    c. Confirm that any necessary modifications are minimized and reversible where possible.

2. **Exterior Renovations and Additions to Historic Buildings:**
    a. Review proposed alterations to the Main Building, multi-purpose room, cafeteria, and auditorium.
    b. Ensure all work complies with the Secretary of the Interior's Standards for Rehabilitation, including but not limited to: roofing replacement, window replacement, exterior finishes, and building additions.

c. Assess visual compatibility and differentiation to prevent creating a false sense of historical development.
d. Recommend materials, construction methods, and detailing that are historically appropriate and distinguishable from original fabric where required.

3. New Construction in the Tertiary Zone:

a. Review design, materials, massing, siting, and orientation of all new buildings.
b. Ensure compatibility with historic buildings in scale, proportion, and material palette.
c. Confirm preservation of historic spatial relationships, open spaces, and sightlines.

4. Documentation and Integration:

a. The historic preservation professional shall submit written recommendations to the project design team.
b. Recommendations shall be incorporated into construction documents prior to issuance of permits.
c. The project design team shall respond in writing to each recommendation, documenting how the recommendation is implemented or explaining why it is not feasible.

5. Construction Monitoring:

a. The historic preservation professional shall periodically monitor construction activities affecting historic resources to ensure compliance with recommendations.
b. Any deviations from approved measures shall be reported immediately to the project manager and corrected promptly.
c. A final compliance report, including photographs and documentation of measures implemented, shall be submitted to the lead agency prior to project closeout.

6. Enforcement and Verification:

a. No work affecting historic resources shall proceed until the lead agency verifies that recommendations have been incorporated into final construction plans.
b. Periodic site inspections shall be scheduled and documented to ensure continued adherence to preservation standards throughout construction.

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-2a: Worker's Environmental Awareness Program** and **Mitigation Measure CR-2b: 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-2a and CR-2b** would reduce this project impact to a **less-than-significant** level.

Mitigation Measure CR-2a: 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-2b: 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 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?

The Sacred Lands File search with the Native American Heritage Commission (NAHC) returned positive results. Therefore, although undiscovered, buried human remains could exist at the project site. Ground-disturbing construction activities could inadvertently encounter such remains, which would constitute a significant impact. The project would implement **Mitigation Measure CR-3: 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-3** also outlines procedures in compliance with applicable federal and state regulations in the event of an unexpected discovery. With implementation of **Mitigation Measure CR-3**, potential project impact on human remains would be reduced to a ***less-than-significant*** level.

Mitigation Measure CR-3: Avoid Impact to Human Remains

As described therein, if human remains are uncovered during future ground-disturbing activities, the District and contractors would be required to 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 would 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 District, an archaeologist, and the Most Likely Descendant designated by the Native American Heritage Commission would 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[21] and 11,655 million therms of natural gas.[22] 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.[23] 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 required, all public school projects undergo plan review by the Division of the State Architect

[21] 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.
[22] 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.
[23] 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.

(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 analysis presented below is based in part on a geotechnical report prepared for the proposed new classroom building at the project site.[24]

Geological Setting

Regional Geological Setting

The project site is located on an alluvial plain, approximately 1.4 miles southwest of the salt ponds of San Francisco Bay and 1.5 miles northeast of the lowermost foothills of the San Cruz Mountain Range.

[24] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.

Local Geology

Geological mapping of the site vicinity indicates that the site is underlain by Holocene-age medium-grained alluvium comprised of unconsolidated to moderately sorted fine sand, silt, and clayey silt. Subsurface investigation at the project site identified sandstone of the Franciscan Complex underlying the geologic units discussed above at a depth of 32 feet.[25]

Seismicity

The project site is located within the San Francisco Bay Area, a region recognized as one of the most seismically active areas in the United States. Three principal fault zones traverse the Bay Area in a northwest orientation and have historically generated approximately a dozen earthquakes per century of sufficient magnitude to cause structural damage. These faults are components of the San Andreas Fault system, a major tectonic boundary extending approximately 450 miles along the California coast. In the project vicinity, the system includes the San Andreas, San Gregorio, Hayward, and Calaveras faults.

The site is located approximately 4.0 miles northeast of the San Andreas Fault, 12.8 miles northeast of the San Gregorio Fault, 14.9 miles southwest of the Hayward Fault, and 21.0 miles southwest of the Calaveras Fault. It is also approximately 3.4 miles northwest of the northern termination of the potentially active Monta Vista–Shannon Fault, and within approximately 0.7 to 1.9 miles of the concealed/buried Quaternary-age Stanford, Palo Altos, and Pulgas faults.

Since the early 1800's, a number of major regional earthquakes have occurred along the Hayward, Calaveras, San Andreas and other fault zones in the vicinity of the San Francisco Bay Area and the surrounding region. Probabilistic seismic hazard models indicate 72 percent probability that one or more earthquakes of magnitude 6.7 or greater will occur in the San Francisco Bay region between 2014 and 2043. Additionally, the probability of one or more regional earthquakes of magnitude 6.0 or greater over the same time period is indicated to be 98 percent. Likewise, the occurrence of at least one regional earthquake of magnitude 5.0 or greater over this time period is evaluated as being a near certainty.

Soils

As discussed above, subsurface investigation of the Sequoia High School site found that soils at the project site are generally characterized by soft to hard sandy clay, silty clay, clayey silt, and gravelly sandy silt in the upper 32 feet underlain by very dense sandstone of the Franciscan Complex to the maximum depth explored, 49 feet. The upper soils encountered at the project site are of variable strength and consistency, and have a variably low to high expansion potential.

[25] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.

Geology and Soils

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 project site is not within a fault rupture hazard zone as mapped by the California Geological Survey (2024) or California Division of Mines and Geology (2024). Consequently, the likelihood of surface rupture at the project site is low. Therefore, 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. As noted above, the project site is located within several miles of multiple active and potentially active faults, including the San Andreas, San Gregorio, Hayward, Calaveras, Monta Vista–Shannon, Stanford, Palo Altos, and Pulgas faults. Probabilistic seismic hazard models indicate a 72 percent likelihood of one or more earthquakes of magnitude 6.7 or greater occurring in the San Francisco Bay region within a 30-year period, a 98 percent likelihood of at least one magnitude 6.0 or greater event, and a near certainty of a magnitude 5.0 or greater earthquake during the same timeframe.

The new construction at the project site would be designed and constructed in accordance with the recommendations provided in the project-specific geotechnical report. 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 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.[26]

As discussed earlier, our investigation found that the project site is generally underlain by soft to hard sandy clay, silty clay, clayey silt, and gravelly sandy silt in the upper 32 feet, underlain by very dense sandstone of the Franciscan Complex to the maximum depth explored, 49 feet. Further soil testing found that the sandy clay and silty clay layers encountered in the upper 27 feet of the soil borings were found to be not susceptible to liquefaction. Soils from depths of 27 feet to 32 feet were found to be potentially susceptible to liquefaction. The sandstone bedrock of the Franciscan Complex is considered to be non liquifiable.[27] Based on the soil analyses, the likelihood of new structure damage as a result of seismically-induced ground settlement is considered low.

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?

Due to the site's relatively gentle topography and the absence of nearby steep and unsupported ground surface, the potential for lateral spreading is considered low. The California Geological Survey does not identify the site as being within an earthquake-induced landslide hazard zone requiring further investigation, and given the site's generally level terrain, the potential for landsliding is considered unlikely. In addition, predicted seismically induced settlement at the project site is below levels typically associated with ground cracking.[28] 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.

[26] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.
[27] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.
[28] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.

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 classroom building, installation of utilities, and improvements to the sport fields. 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. 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.

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. The site is characterized by relatively gentle topography and does not contain any nearby steep or unsupported ground surfaces. 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 proposed new classroom building were found to have a variably low to high expansion potential. To address potential risks associated with expansive soils, all new construction would be designed in accordance with a project- and site-specific geotechnical investigation, subject to review and approval by the Division of the State Architect (DSA) for school facilities. The geotechnical report would provide recommendations for appropriate soil preparation and foundation design measures, which may include the use of stabilized and properly compacted engineered fill beneath the building footprint. Compliance with these recommendations would reduce potential impacts related to expansive soils to a ***less-than-significant*** level.

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 wastewater 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 classroom building is not expected to extend beyond a depth of approximately 10 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 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 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." [29]

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.[30]

- 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.

[29] 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.

[30] 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.

Greenhouse Gas Emissions

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

There are no listing of the project site on the California Department of Toxic Substances Control's (DTSC) EnviroStor database nor the State Water Resources Control Board's GeoTracker database.[31,32]

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 a new two-story classroom building and an outdoor classroom, renovation of existing buildings, and associated infrastructure and landscaping improvements. Construction activities of new buildings would involve site preparation that would include grading and staging of construction equipment and trailers, among other site preparation activities in the zoned areas planned for construction.

[31] DTSC. EnviroStor. https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=1090+mills+way%2C+redwood+City%2C+CA. Accessed December 10. 2025.
[32] State Water Resource Control Board. Geotracker. . https://geotracker.waterboards.ca.gov/profile_report?global_id=T0608100106 Accessed December 10, 2025

Additionally, construction of new buildings would include the installation of new utilities, including water, sewer, and electrical services. Construction of new buildings would include restoration activities, 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 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 SCM-5: Hazardous Materials, that include implementation of best management practices, including hazardous materials management measures, to reduce short-term construction impacts pertaining to the transport, use, and disposal of hazardous materials.

In addition, the District would require the contractor 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, closing facilities with hazardous waste in place, describing requirements for emergency response, and ensuring that workers are trained to handle hazardous materials and respond appropriately to hazardous 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, as noted below in **Section 6.7 – Geology and Soils**, the District would be required to submit a site-specific Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would include a description of appropriate BMPs to minimize the discharge of pollutants from the project site.

Operation. Once constructed, similar to current campus operations, the proposed project would likely result in the use of common types of hazardous materials, such as cleaning products, disinfectants, and solvents. These products are labeled to inform users of their potential risks and provide instruction regarding appropriate handling procedures. However, most of these materials are consumed through use, resulting in relatively little waste. Therefore, hazardous materials used during proposed project operation would not pose substantial public health or safety hazards resulting from routine use, transport, or disposal.

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 renovations would include the demolition of some building materials that 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 and as outlined in SCM-5: Hazardous Materials, 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.

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 involve the routine, intermittent use of 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.

As noted above, the proposed project would comply with applicable regulations to handle, transport, and dispose of potential hazardous materials. Compliance with these regulations

would ensure that the project does not result in hazardous emissions or the improper handling of acutely hazardous materials or wastes. Therefore, the project impact associated with hazardous materials 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?

As noted above, the project site is not listed as an active or open hazardous materials case on any state regulatory database. Therefore, the proposed project would have ***no impact*** associated with the creation of a significant hazard to the public on hazardous materials sites.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 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 nearest airport to the project site is San Carlos Airport, approximately 1.6 miles to the northwest. As discussed under Section 6.13, Noise and shown on **Figure 6**, the project site is located outside the influence area of this airport. San Francisco International Airport is located approximately 10 miles from the project site. 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 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. As discussed in **Section 6.17, Transportation,** on a long-term basis, the project would not alter circulation patterns or roadways near the project site. Therefore, the proposed project would have a ***less-than-significant*** 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 (FHSZ).[33] The nearest designated FHSZ to the project site is the area designated as moderate FHSZ within the Redwood City Foothill neighborhoods located approximately 1.8 miles to the southwest.[34] The site is situated in an urbanized area with developed infrastructure, reducing the likelihood of direct exposure to wildfires. Fire protection in the project area is provided by the Redwood City Fire Department.

[33] Cal Fire. 2025. Fire Hazard Severity Zone Viewer. https://experience.arcgis.com/experience/5065c998b4b0462f9ec3c6c226c610a9. Accessed October 10, 2025.
[34] Redwood City. 2026. Hazard Maps Collection. Current Cal Fire FHSZ (State Responsibility Area Effective April 2024 and 2025 Local Responsibility Area adopted by the Redwood City Commission on May 12, 2025. https://rwc.maps.arcgis.com/apps/instant/portfolio/index.html?appid=f7fea1092035469eafbbb2aa7c4a6f08. Accessed January 9, 2026.

The proposed project does not propose new structures within areas designated as high, very high, or extreme wildfire threat zones. Project impact related to wildfire is discussed further in **Section 6.20 – Wildfire**. The proposed development would not significantly expose people or structures to the risk of loss due to wildland fires. This impact is considered ***less than significant***.

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 Sequoia High School campus is located at an approximate elevation of 20 feet above mean sea level and is generally flat, with a gentle topographic gradient toward the northeast.[35] The project site is located within the Redwood Creek watershed, which flows for 37 miles and drains an area of approximately 11.8 square miles.[36] The Redwood Creek flows from its headwaters west of Interstate 280 (I-280). From approximately the intersection of Alameda de Las Pulgas

[35] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.
[36] San Mateo Countywide Water Pollution Prevention Program. Flows to Bay. https://flowstobay.org/data-resources/maps/watershed-map/. Accessed December 8, 2025.

and Woodside Road the creek flows through a concrete channel to El Camino Real and then through an underground culvert to San Francisco Bay.[37]

Groundwater

Based on the exploratory borings drilled near the proposed new classroom building, historical subsurface investigation, and groundwater well records indicates a historical high groundwater table of approximately 5.9 feet below the ground surface.[38]

Stormwater

The City of Redwood City's Public Works Services Department is responsible for operating and maintaining the stormwater drainage system. Stormwater in Redwood City is conveyed through a separate storm drainage system distinct from sanitary sewer, comprising storm drains, curb inlets, pipes, channels, and pump stations that collect runoff and discharge it to local creeks and ultimately to the San Francisco Bay. Runoff is not treated prior to discharge, so controls focus on reducing pollutants before entering the system.[39]

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.[40]

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. The proposed project would be required to comply with the District's standard construction measure, SCM-6: Hydrology and Water Quality, which requires all projects to implement site-specific erosion and sedimentation controls, to prevent the discharge of sediment and other pollutants to storm drains and surface waters.

Because the project would involve more than one acre of ground disturbance, it is subject to the 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.

In addition, the proposed project would comply with Redwood City Chapter 27A – Stormwater Treatment Measures and Maintenance Program of the Municipal Code.

[37] San Mateo Countywide Water Pollution Prevention Program. 2008. Unified Stream Assessment in Seven Watersheds in San Mateo County, California. August.
[38] Cleary Consultants, 2025. Geotechnical and Geologic Hazards Investigation New Classroom Building Project. Sequoia High School. May.
[39] Redwood City. Business Stormwater Inspection Program. https://www.redwoodcity.org/home/showpublisheddocument/23884/637647193463830000. Accessed December 13, 2025.
[40] FEMA. 2023.National Flood Hazard Layer FIRMette. 06081C0301F, effective on April 5, 2019.

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 District's SCM-6, Chapter 27A of Redwood City Municipal Code, and 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. Following project construction, the proposed FMP would increase the amount of impervious surface area associated with the new classroom building, outdoor classroom, and fire lane improvement, which could result in increased stormwater runoff and associated pollutant transport. However, the project would incorporate post-construction stormwater control measures, including installation of a bioretention/biofiltration basin near the northeast portion of the site adjacent to the proposed building. The basin would be designed to capture, detain, and treat runoff from new impervious surface prior to discharge to the municipal storm drain system, consistent with applicable Municipal Separate Storm Sewer System (MS4) permit requirements and City standards.

Implementation of post-construction stormwater control measures would reduce runoff rates and volumes and provide water quality treatment through filtration, infiltration, and biological uptake, thereby minimizing potential impacts related to erosion, flooding, and degradation of downstream water 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 new classroom building, outdoor classroom, and fire lane improvement. The project site is not located within a designated groundwater recharge area, and no groundwater extraction would occur as part of project operations. The two main sources of recharge in Redwood City are stream channel percolation and stormwater infiltration. There are no projects planned to assist in recharging the basin, as it's not heavily used, groundwater levels are shallow, and there is a lack of suitable locations for any type of recharge project currently.[41]

[41] California State Water Resources Control Board. San Mateo Plain Groundwater Subbasin (2.009.03). https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/groundwater/BasinLinks/San_Mateo_Plain_Basin.pdf. Accessed December 12, 2025.

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, the project would comply with the District's SCM-6 and Chapter 27A of Redwood City Municipal Code. In addition, 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 would incorporate site improvements and stormwater infrastructure upgrades, including the installation of biofiltration basin, 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 pavement, construction of a new classroom building, a new outdoor classroom, renovation of existing structures, and associated site improvements. These activities would result in a marginal increase in impervious surfaces compared to existing conditions.

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 and help reduce the velocity of stormwater. Therefore, this impact 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 substantially 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 the new development would include postconstruction stormwater control measures designed to regulate runoff volumes and flow rates such that peak discharge would not exceed existing conditions.

The proposed FMP improvements would not result in substantial changes to on-site or off-site drainage patterns, nor would they increase the potential for erosion, siltation, or other water quality impacts. Therefore, 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 new construction 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 0.8 miles southwest of the San Francisco Bay shoreline tsunami zone.[42] 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 as require by the District's SCM-6 and 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.

[42] California Department of Conservation. San Mateo County Tsunami Hazard Areas. https://conservation.ca.gov/cgs/tsunami/maps/san-mateo. Accessed December 15, 2025.

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 project site is located in Redwood City in San Mateo County. The site is an existing high school campus originally constructed in 1895 and has been subject to various additions and renovations over time. Surrounding land use include commercial uses, such as restaurants and shopping centers, north and east along El Camino Real, residential uses on the northwest, southwest, and southeast sides, and by apartment complexes to the northeast. McKinley Institute of Technology is situated South of the project site near Cornerstone community church and Our Lady of Mount Camel Church. Saint Michael's Preschool and Infant care is located south of the campus. The Redwood City General Plan designates the project site as Public Facilities.[43]

a) Physically divide an established community?

The 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 Redwood City 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

[43] Redwood City. Redwood City Community GIS. https://webgis.redwoodcity.org/community/. Accessed December 15, 2025.

impacts to less-than-significant levels. Therefore, the 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 Redwood City.[44]

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 Redwood City 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.

[44] California Department of Conservation. Division of Mine Reclamation. 2025. Mines Online: https://maps.conservation.ca.gov/mol/index.html. Accessed December 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 6 – 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 7 – Typical Noise Levels in the Environment**.

TABLE 6 – 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 7 – 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 (background)
	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 8 – 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.

TABLE 8 – 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.

The annoyance levels shown in **Table 8** 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.

The two primary concerns with construction-induced vibration are the potential to damage a 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 8** 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.

The City of Redwood City limits construction activities to 8:00 a.m. to 5:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturdays. No construction is permitted on Sundays or holidays. Construction noise levels over 110 dB are considered excessive, unreasonable, and unlawful. To maintain consistency with other analyses prepared for the school district, this study also applies the Federal Transit Administration’s (FTA) noise thresholds to conservatively evaluate construction noise levels. The FTA sets daytime construction noise limits at 80 dBA Leq for residential areas, 85 dBA Leq for commercial and office areas, and 90 dBA Leq for 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"). **Table 9 – Construction Noise Levels at 50 Feet** and **Table 10,**

Construction Noise Levels at Receptors, provide the expected construction noise levels for the new classroom building (N-1 in Figure 3), while **Table 11 – Construction Noise Levels at 50 Feet** and **Table 12 – Construction Noise Levels at Receptors** do the same for the turf at the baseball field (S-2 in Figure 3).

TABLE 9 – CONSTRUCTION NOISE LEVELS AT 50 FEET (N-1 NEW CLASSROOM 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)[a] Forklift (2) Tractor/Loader/Backhoe (2)[a]	81 75 84/79	81
Building – Interior / Architectural Coating	Air Compressor (1)[b]	78	74
Paving	Cement and Mortar Mixer (4)[a] Paver (1) Roller (1) Tractor/Loader/Backhoe (1)[a]	80 77 80 84	82

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

TABLE 10 – CONSTRUCTION NOISE LEVELS AT RECEPTORS (N-1 NEW CLASSROOM BUILDING)

Phase	Hourly Average Noise Levels[a], dBA L_{eq}				
	Source (50 ft)	North Commercial (500 ft[b])	Northeast Commercial/ Future Residential (570 ft[b])	Southeast Residential Northwest Church (670 ft[b])	Southwest Residential (1,050 ft[b])
Demolition	86	66	65	63	60
Site Preparation	84	64	63	61	58
Grading / Excavation	85	65	64	62	59
Trenching / Foundation	82	62	61	59	56
Building – Exterior	82	62	61	59	56
Building – Interior/ Architectural Coating	74	54	53	51	48
Paving	85	65	64	62	59

[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 11 – CONSTRUCTION NOISE LEVELS AT 50 FEET (S-2 TURF 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

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

TABLE 12 – CONSTRUCTION NOISE LEVELS AT RECEPTORS (S-2 TURF AT BASEBALL FIELD)

Phase	Hourly Average Noise Levels[a], dBA L_{eq}				
	Source (50 ft)	Northwest Residential (700 ft[b])	Northeast Commercial/ Future Residential (1,400 ft[b])	Southeast Residential (640 ft[b])	Southeast Residential (210 ft[b])
Site Preparation	85	62	56	63	73
Grading / Excavation	85	62	56	63	73
Trenching / Foundation	82	59	53	60	70

[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.

As shown in **Tables 10** and **12**, construction noise levels produced by the major improvements at Sequoia High School would remain 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. In addition, as discussed in **Section 3.2.4, 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. As required by SCM-7, the proposed project would implement the following best management practices.

- Construction activities shall be limited to the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturdays. No construction is allowed on Sundays or holidays.
- Control noise from construction workers' radios to the point where they are not audible at existing residences that border the project site.
- 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. 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.

- Select construction staging areas 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., a bad muffler) and 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.

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

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[45]:

Table 13 – 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.

Construction activities would occur no closer than 50 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***

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

TABLE 13 – VIBRATION LEVELS FOR CONSTRUCTION EQUIPMENT AND MINIMUM SETBACKS

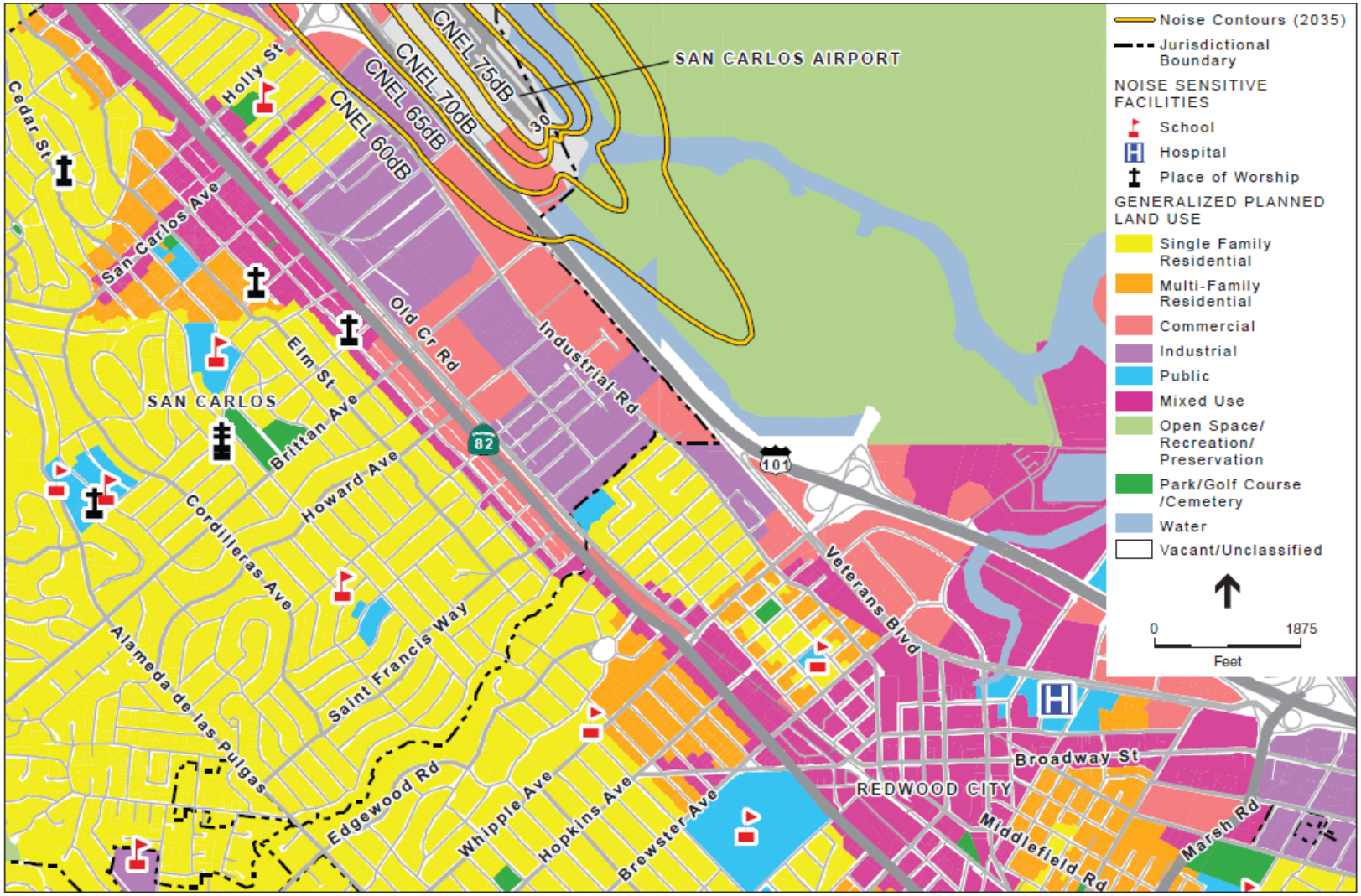
Equipment		PPV at 25 ft. (in/sec)	Minimum Setback to Meet the Thresholds	
			0.3 in/sec PPV, feet	0.5 in/sec PPV, feet
Clam shovel drop		0.202	20	14
Hydromill (slurry wall)	in soil	0.008	3	2
	in rock	0.017	4	3
Vibratory Roller		0.210	20	15
Hoe Ram		0.089	12	8
Large bulldozer		0.089	12	8
Caisson drilling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

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 1.6 miles northwest of the project site. The Comprehensive Airport Land Use Compatibility Plan (ALUCP) for the San Carlos Airport area depicts the projected 2023 noise contours. Sequoia 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**).

Sequoia High School is located more than 10 miles from the San Francisco International Airport and well outside the airport's 65 dBA CNEL noise contour. Thus, the project would have ***no impact*** as aircraft noise exposure would be considered compatible with the proposed educational uses.



San Carlos Airport ALUCP . 130753

SOURCES: Belmont, 1982; San Mateo County, 1986; Foster City, 1993; Menlo Park, 1994; San Carlos 2009; City of San Mateo, 2010; Redwood City, 2010; ESRI, 2014; ESA Airports, 2014

FIGURE 6

2035 Noise Contours of the San Carlos Airport

Sequoia 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 Redwood City in San Mateo County. In 2024, the City's population was estimated at approximately 82,982 residents, with 29,951 households and an average household size of 2.69 persons.[46] At the county level, San Mateo County had an estimated population of 742,893 residents and 264,419 households, with an average household size of 2.76 persons.[47]

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 Sequoia 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.

[46] U.S. Census Bureau. Quick Facts. Redwood City California https://www.census.gov/quickfacts/fact/table/redwoodcitycitycalifornia/PST045224. Accessed February 26, 2026.
[47] U.S. Census Bureau. Quick Facts. Redwood City California https://www.census.gov/quickfacts/fact/table/redwoodcitycitycalifornia/PST045224. Accessed February 26, 2026.

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

Redwood City Fire Department provides fire protection and emergency response services to the Cities of Redwood City and San Carlos, as well as portions of unincorporated San Mateo County. The department operates seven staffed fire stations with engines, truck, and battalion chief apparatus, supported by over 90 personnel. Fire units are cross-staffed with firefighter/paramedics capable of delivering advanced life support (ALS) and respond to medical emergencies as part of the countywide EMS system administered by San Mateo County Public Safety Communications. Redwood City's fire protection service meets rigorous performance standards and maintains an ISO Class 1 rating, reflecting superior fire protection capabilities. [48]

Police Protection

Police protection services for the City of Redwood City are provided by the City of Redwood City Police Department (RCPD). RCPD is organized into divisions including Patrol, Investigations, and Administrative Services, and delivers front-line law enforcement response, crime prevention, community policing, and specialized youth services such as the School Resource

[48] Redwood City. Fire Department. https://www.redwoodcity.org/departments/fire-department. Accessed December 15, 2025.

Officer (SRO) program. The Department also maintains collaborative juvenile services to support school safety, early intervention, and community well-being.[49]

Schools

The Redwood City School District (RCSD) is the public elementary school district that provides education from transitional kindergarten through eighth grade for students residing within most of Redwood City and portions of surrounding communities.[50] In addition, portions of Redwood City fall within the boundaries of the Belmont-Redwood Shores School District (BRSSD). BRSSD is a separate public K–8 school district providing elementary and middle school services to families in Belmont and Redwood Shores, with campuses such as Redwood Shores Elementary School and Sandpiper School located within Redwood City's community area.[51] Students who complete eighth grade within either RCSD or BRSSD generally enroll in SUHSD's high school programs for grades 9–12 based on their residence within SUHSD attendance boundaries.

Parks

Redwood City operates more than 30 parks and recreation sites distributed across residential and commercial areas of Redwood City, providing passive and active recreation opportunities such as playgrounds, picnic areas, sports fields, court sports, and open turf areas. Larger community parks include Red Morton Park, located approximately 0.9 miles south of the campus. This park is approximately 31.7 acres and includes which features ball fields, courts, picnic areas, and open lawn space. Smaller neighborhood parks and mini-parks located within about a mile of Sequoia High School include Dolphin Park**,** Hoover Park**,** Hawes Park**,** Jardin de Niños, and Linden Park.[52] Regional open spaces include Edgwood Park & Natural Preserve, located approximately 2.29 miles southwest of the campus, is comprised of approximately 476 acres of open space with over 10 miles of hiking trails.[53]

In addition, Sequoia High School itself provide on-site recreation space such as athletic fields and tracks.

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, 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

[49] Redwood City. Police Department. https://www.redwoodcity.org/departments/police-department/about-us. Accessed December 15, 2025.
[50] Redwood City School District. https://www.rcsdk8.net/. Accessed December 15, 2025.
[51] Belmont-Redwood Shores School District. https://www.brssd.org/. Accessed December 15, 2025.
[52] Redwood City Parks. Recreation & Community Services. Park Locations. https://www.redwoodcity.org/departments/parks-recreation-and-community-services/parks/park-locations. Accessed December 15, 2025.
[53] County of San Mateo. Edgwood Park & Natural Reserve. https://www.smcgov.org/parks/edgewood-park-natural-preserve. Accessed December 15, 2025.

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 already served by 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 RCPD 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 Sequoia 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 RCSD and 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 Sequoia 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 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

As discussed under **Section 6.15 – Public Services,** Redwood City operates more than 30 parks and recreation sites distributed across residential and commercial areas of Redwood City.

Neighborhood and community parks within the vicinity of Sequoia High School provide a range of recreational amenities, including playgrounds, picnic areas, sports fields, and passive open space that are accessible to residents within walking and short driving distance. City-maintained parks in Redwood City vary in size and function, ranging from small neighborhood and mini-parks serving local residential areas to larger multi-use community parks that accommodate organized athletics and community events. In addition, on-campus athletic fields and recreational facilities are present at Sequoia High School campus. Beyond the immediate urban area, regional open space preserves provide substantial passive recreational opportunities, including trail networks.

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

Regional access to the project site is provided by:

- Highway 101 (US 101) and State Route 84 (Woodside Road)
- State Route 82 (El Camino Real), which also connects to SR 84 and offers direct city access.

Local access is provided by:

- Brewster Avenue – A two-lane bicycle boulevard that runs from Main Street in the northeast to Upland Road in the southwest, providing connection to citywide roadways. Near the project site, striped Class II bicycle lanes and sidewalks are provided along both sides of the roadway. The posted speed limit is 25 mph.
- Broadway – A two-lane transit corridor that runs from Hopkins Avenue in the west to Fifth Avenue to the east, providing connections to Downtown Redwood City, the Caltrain Station, and emergency response centers in Redwood City. Near the project site, striped Class II bicycle lanes and sidewalks are provided along both sides of the roadway. The posted speed limit is 25 mph.
- James Avenue – A two-lane local street that runs from the Redwood City Caltrain Station in the northwest to Alameda de las Pulgas in the southwest, serving residential areas and the Caltrain Station. Near the project site, Class III bicycle routes and sidewalk are provided along both sides of the roadway, The posted speed limit is 25 mph.
- Elwood Street – A two-lane local street that runs from Whipple Avenue in the northwest to James Avenue in the southeast, serving adjacent residential uses. Near the project site,

Class III bicycle routes and sidewalk are provided along both sides of the roadway, The posted speed limit is 25 mph.

These routes support multimodal connectivity—vehicle, bicycle, and transit—critical for evaluating transportation impacts and emergency access.

Existing Vehicular Site Access

Student and staff parking is located along the southeast and southwest boundaries of the project site, accessed from Elwood Street and James Avenue. A staff-only lot is along the northwest boundary, accessed from Brewster Avenue. Limited staff and visitor spaces are available near the Main Building, accessed through the gateway at the Broadway and Brewster Avenue intersection.

Student pick-up and drop-off occur in the main lot located at the southern corner, accessed from James Avenue. School buses a designated area near Gym 1 and enter via James Avenue.

Existing Bicycle and Pedestrian Facilities

Striped Class II bicycle lanes are provided along Brewster Avenue and Broadway, while Class III bicycle routes are provided along Elwood Street and James Avenue near the project site. Student bicycle parking is provided near the baseball field, including four bicycle racks and two enclosed bicycle cages, each can accommodate approximately 40 bicycles. The bicycle parking area is accessible via a driveway on Elwood Street.

Sidewalks are provided along the entire project site boundary. Signalized pedestrian crossings are located along El Camino Real at the intersections with Broadway and James Avenue, providing access to transit stops along El Camino Real (as described in the Existing Transit Services section). Signalized crossings are also provided at the Brewster Avenue and Broadway intersection, facilitating access through the campus gateway adjacent to the intersection.

There are multiple pedestrian project site access points along El Camino Real and Brewster Avenue, separated from vehicular driveways. Internal pedestrian pathways connect classrooms, offices, and athletic facilities.

Existing Transit Services

The nearest bus stops to the project site are located on El Camino Real near its intersections with Brewster Avenue and James Avenue. San Mateo County Transit District (SamTrans) operates Routes ECR and 397 with stops on El Camino Real near Brewster Avenue and James Avenue. Thes stops are accessible via sidewalks and signalized crosswalks at both intersections. The Redwood City Caltrain Station is approximately 500 feet from the project site, accessible via Broadway and James Avenue.

Existing Emergency Access

Emergency vehicles can access the project site via driveways on Broadway, James Avenue, and Elwood Street. Nearby emergency response centers include:

- Fire stations:
  - Redwood City Fire Department – Station 9 (Marshall Street and Main Street) — approximately 0.6 miles away via Marshall Street and Broadway, and
  - Redwood City Fire Department – Station 10 (Jefferson Avenue and Myrtle Street) — approximately 0.8 miles away via Jefferson Avenue, Iris Street, and James Avenue.
- Police stations:
  - Redwood City Police Substation (Broadway and Hamilton Street) — approximately 0.4 miles away via Broadway, and
  - Portola Valley Police Department (Marshall Street and Winslow Street) — approximately 0.4 miles away via Broadway.
- Emergency medical services:
  - UCSF Health-GoHealth Urgent Care (Broadway and Jefferson Avenue) — approximately 0.6 miles away via Broadway, and
  - Kaiser Permanente Redwood City Medical Center (Veterans Boulevard and Walnut Street) — approximately 1 mile away via Marshall Street and Broadway.

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

The proposed project focuses on improving the campus operations and modernizing campus facilities and is not expected to increase student enrollment. As a result, campus operations would remain consistent with current conditions after construction. The proposed project would:

- Not alter travel patterns to and from the school
- Not significantly increase pedestrian, bicycle, or vehicle traffic, even along routes with limited infrastructure.
- Also not add a substantial volume of vehicular traffic to surrounding roadways.

Planned improvements under the Redwood City General Plan and Walk Bike Thrive Plan—such as the Brewster-Avenue road diet, new bike lanes along El Camino Real, Brewster Avenue, and James Avenue, traffic calming on Elwood Street, and enhanced crossings at the El Camino Real and James Avenue intersection—would remain unaffected.

Construction of new facilities, renovation of existing facilities, and other miscellaneous campus improvements will occur within the project site, not in the public right-of-way. Material staging will be fully contained on site, within a designated area on the green space adjacent to the new classroom building.

As a result:

- No lane narrowing or closures
- No sidewalk or crosswalk closures
- No bike lane closures

Because work is confined to the site, construction will not disrupt existing or planned facilities or services, nor conflict with any circulation-related program, plan, ordinance, or policy.

The project's operational and construction impacts on the existing and planned transportation system would be ***less than significant***.

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

Since the proposed project assumes no increase in student enrollment, project operation is not anticipated to generate new vehicle traffic or constitute an increase in roadway travel. Further the construction activity is temporary on the project site and persistent in the region, in other words this project supports the existing construction industry and does not increase construction activities. Therefore, the project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

For additional context the construction workforce is anticipated to average approximately 48 daily workers, with a maximum of 57 workers on any given day. The number of daily truck trips would range between 1 and 50, with peak activity occurring during the construction of new buildings. Assuming each worker makes one round-trip commute per day and parks on campus near the staging area, an average of approximately 96 construction worker commute trips would occur daily, with a maximum of 114 trips on any given day during temporary construction of the project. In addition, assuming an average of 25 truck trips per day, the estimated total number of construction-related trips would be approximately 121 per day on average, with a maximum of 164 trips on peak days during temporary construction of the project.

Project construction would temporarily increase vehicle trips from worker commutes and material deliveries. However, these trips would be minor compared to normal school traffic and construction workers would be sourced locally to support the local construction economy:

Based on an enrollment of approximately 1,852 students for the 2024–2025 school year and an Institute of Transportation Engineers (ITE) Trip Generation Manual (12th Edition) rate of 1.94 trips per student (approximately 3,612 daily vehicle trips), the projected peak construction activity of approximately 139 daily trips would represent less than four percent of typical daily school-related traffic volumes.

- Peak construction traffic would occur during the new building phase, which is expected to last less than one year within the overall four-year schedule. The remaining construction period would generate lower traffic levels.

Therefore, construction would not cause a substantial increase in roadway travel or vehicle miles traveled (VMT) and project's traffic construction 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 of new facilities, renovation of existing facilities, and other miscellaneous campus improvements will occur within the project site. Construction materials would be stored in secure, fenced areas near their respective sites. Measures such as signage, lighting, and flaggers would clearly delineate construction zones and keep bicycle and pedestrian paths safe.

Worker parking would be located near the staging area, separate from student and staff zones. Construction vehicles will use the existing campus gateway at the Broadway and Brewster intersection. Temporary traffic controls (e.ge. flaggers) and staggered scheduling would maintain two-way access and minimize congestion.

No new access points or geometric design changes would be introduced. No increase in student enrollment means no additional parking or loading demand. Therefore, construction and operational conditions would create hazardous conditions for people walking, bicycling, driving, or using transit. The impact would be ***less than significant***.

d) Result in inadequate emergency access?

Fire, police, and emergency medical services are within approximately 0.6 miles of the project site, and the typical response time is under five minutes. Direct access to the site is provided via El Camino Real, Broadway, Brewster Avenue, and James Avenue.

Construction activities, including new classroom building construction, renovation of existing facilities, and other miscellaneous campus improvements, would occur on site. Truck arrivals would be coordinated to prevent conflicts and keep Gateway at Broadway/Brewster clear. Therefore, the project would not physically block any streets providing access to and from the site, nor would it generate traffic congestion that could significantly compromise timely access. Further, construction parking would be confined to a designated area near the staging areas, separate from student and staff zones. Consequently, there would not be disruption to the designated city evacuation routes on El Camino Real and Broadway.

Emergency access would remain adequate during construction and operation. 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 October 2, 2025, the District sent AB 52 outreach letters to the tribes listed in the contact list provided by the NAHC on June 26, 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 October 6, 2025, the Muwekma Ohlone Tribe emailed the District to request a formal consultation. Also, on October 21, Indian Canyon Band of Costanoan Ohlone People Tribe wrote to the District requesting a formal consultation.

On November 14, 2025, the District extended an invitation to the tribe for a meeting on December 2, 2025, to initiate the formal consultation in compliance with AB52. Because the tribe representatives did not attend the meeting and requested another time, the District scheduled a second meeting with the tribe on January 13, 2026. During that meeting, the tribe representative expressed concern with the proposed project and requested further information related to the tribal cultural resources analysis and identified mitigation measures. On January 26, 2026, the District emailed the tribe with the requested information and asked for their feedback.

At the time of publishing this Initial Study, the tribe has not responded back with any feedback. 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. Based on the preliminary archeological review prepared for the project, the proposed project has the potential to adversely affect prehistoric resources, which includes tribal cultural resources. **Mitigation Measure CR-2: Avoid Impact to Human Remains**, described under **Section 6.5 – Cultural Resources**, includes provisions to address resources encountered during construction. In addition, to reduce potential impacts to tribal cultural resources, the District shall implement **Mitigation Measure M-TCR-1: Tribal Cultural Resources Archaeological Resource Preservation Plan and/or Interpretive Program** to ensure that if a potential tribal cultural resource were discovered during construction, it would either be preserved in place or if preservation is not feasible, archeological data recovery would be conducted and a public

interpretation plan would be implemented. Inclusion of these measures would require coordination between the District and with the affiliated Native American tribal representatives to preserve the information and value of the tribal cultural resource.

Implementation of **Mitigation Measure M-TCR-1** would require the appropriate involvement of concerned Native Americans in the treatment of tribal cultural resources discovered during construction and would ensure that any such resource would be preserved, or that the information it represents would be preserved and interpreted to the public. These steps would ensure that project excavation would not cause a substantial adverse change in the significance of tribal cultural resources that could be encountered during construction, and that the proposed project's impact would be ***less than significant with mitigation***.

Mitigation Measure M-TCR-1: Tribal Cultural Resources Archaeological Resource Preservation Plan and/or Interpretive Program

Preservation In Place. In the event of the discovery of an archaeological resource of Native American origin, the District and the tribal representative, shall consult to determine whether preservation in place would be feasible and effective. If it is determined that preservation-in-place of the tribal cultural resource (TCR) would be both feasible and effective, then the District's consultant shall prepare and implement an archeological resource preservation plan (ARPP).

Public Interpretation and Land Acknowledgement. If the District, in consultation with the affiliated Native American tribal representatives, determine that preservation-in-place of the tribal cultural resources is not a sufficient or feasible option, the District shall, in consultation with local Native American representative's, design and install public interpretation at the project site that shall address the tribal values represented by the resource and acknowledge that this project is built on traditional tribal land. Coordination for interpretive program and land acknowledgement shall take place with local Native American representatives. The interpretive program may include a combination of artwork, preferably by local Native American artists, educational panels or other informational displays, a plaque, or other interpretative elements. The District shall prepare an interpretation plan in consultation with affiliated local Native American representatives to guide the interpretive and acknowledgment program. The plan shall identify, as appropriate, proposed locations for the interpretation as outlined above, the proposed content and materials of the interpretation, the producers or artists of the displays or installation, and a long-term maintenance program. If Native American cultural resources are found during project construction, interpretation of these resources may be included in the interpretative program in consultation with the local Native American representatives.

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

In Redwood City, water service is provided by two retail agencies depending on the location. The primary provider is the City of Redwood City Water Division, which owns and operates its municipal water system. The City purchases the majority of its water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System.[54] A smaller portion of Redwood City, as well as adjacent unincorporated areas of San Mateo County, receives water from the Mid-Peninsula Water District (MPWD), which also sources its water entirely from the SFPUC and distributes it within its defined service area.[55] The Sequoia High School campus is within the service area of the City Water Division.

Wastewater

In Redwood City, California, wastewater collection, conveyance, and treatment services are provided through a combination of City-owned infrastructure and regional wastewater facilities. The City's Public Works Services Department owns and operates an extensive sanitary sewer collection system, consisting of approximately 190 miles of sewer pipelines and numerous

[54] Redwood City. Water. https://www.redwoodcity.org/residents/water. Accessed December 10, 2025.
[55] MPWD. https://www.midpeninsulawater.org/about. Accessed December 10, 2025.

sewer pump stations that collect wastewater from residential, commercial, and institutional customers, as well as from several adjacent San Mateo County Sewer Maintenance Districts under interagency agreements.[56] Redwood City conveys wastewater flows from its collection system to the regional treatment facility known as Silicon Valley Clean Water (SVCW), a Joint Powers Authority wastewater treatment plant located in Redwood Shores that serves the cities of Redwood City, San Carlos, Belmont, and the West Bay Sanitary District. The SVCW facility conveys, treats, and disposes of wastewater**,** discharging high-quality treated effluent to the San Francisco Bay in compliance with regulatory permits, with advanced biological treatment processes designed to remove solids and organic material.[57]

Solid Waste

In Redwood City, California, solid waste services are provided through a collaborative regional framework designed to manage garbage, recycling, compost, and disposal for both residential and commercial users. The City is a member of the South Bayside Waste Management Authority (SBWMA), also known as RethinkWaste, a joint powers authority composed of multiple San Mateo County jurisdictions, including Redwood City. SBWMA owns and oversees the Shoreway Environmental Center in the City of San Carlos, which functions as a regional hub for managing collected waste and recyclable materials from SBWMA member agencies.[58] Recology San Mateo County serves as the franchised waste hauler under contract with SBWMA and the City, providing curbside collection of solid waste, recyclables, and organic materials for Redwood City residents and businesses.[59] Collected materials are transported to the Shoreway Environmental Center, where they are processed, separated, and consolidated; recyclable and compostable materials are diverted for further processing, while non-recyclable solid waste is transferred for final disposal at permitted facilities, including the Ox Mountain Sanitary Landfill in Half Moon Bay and other appropriate recycling and organics facilities.[60]

Electricity and Natural Gas

Pacific Gas & Electric Company (PG&E) is the natural gas and electricity provider for Redwood City.[61]

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?*

Because the FMP improvements are not expected to increase overall student capacity, overall water demand is not anticipated to increase. Temporary water demand would occur during construction activities of the proposed project, after which water use would continue to support normal school operations. The project would connect to existing municipal water supply

[56] Redwood City. 2023. Sanitary Sewer Capacity Master Plan. Final Report. November.
[57] Silicon Valley Clean Water. https://svcw.org/about. Accessed December 10, 2025.
[58] South Bayside Waste Management Authority. 2024. 2025-2034 Long Range Plan. November 21.
[59] Redwood City. Solid Waste. https://www.redwoodcity.org/departments/public-works/solid-waste. Accessed December 10, 2025.
[60] South Bayside Waste Management Authority. About Shoreway. South Bayside Waste Management Authority. Accessed December 10, 2025.
[61] Redwood City. Energy. https://www.redwoodcity.org/departments/public-works/environmental-initiatives/energy-initiatives. Accessed December 10, 2025.

infrastructure. 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 proposed 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 proposed 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 not result in the need for new or expanded off-site wastewater treatment facilities and would continue to be served by the City's Public Works Services Department and the SVCW treatment facility. 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. The proposed project would comply with Redwood City's solid waste requirements by implementing an organics recycling program consistent with SB 1383, including providing properly labeled

collection bins for food and green waste, ensuring all waste streams are diverted to the City's curbside or commercial organics collection service, and coordinating with Recology and RethinkWaste for proper disposal and recycling of all collected materials.

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 Redwood City's solid waste requirements. 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***.

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**, Redwood City Fire Department provides fire protection and emergency response services to the Cities of Redwood City and San Carlos, as well as portions of unincorporated San Mateo County. The department operates seven staffed fire stations with engines, truck, and battalion chief apparatus, supported by over 90 personnel. The closest Redwood City Fire Department station to Sequoia High School at 1201 Brewster Avenue is Station 9, located at 755 Marshall Street.

In compliance with state regulations, Redwood City 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 nearest designated FHSZ to the project site is the area designated as moderate FHSZ within the Redwood City Foothill neighborhoods located approximately 1.8 miles to the southwest.[62]

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

The campus is within a developed area of Redwood City, 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

[62] Redwood City. 2026. Hazard Maps Collection. Current Cal Fire FHSZ (State Responsibility Area Effective April 2024 and 2025 Local Responsibility Area adopted by the Redwood City Commission on May 12, 2025. https://rwc.maps.arcgis.com/apps/instant/portfolio/index.html?appid=f7fea1092035469eafbbb2aa7c4a6f08. Accessed January 9, 2026.

located at approximately 1.8 miles southwest of the project site. 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 Redwood City Fire Department 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 buildings 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. This impact 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**, 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** and **CR-1b**, and **CR-2** and **Section 6.18 – Tribal Cultural Resources, Mitigation Measure TCR-1** 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 new classroom buildings and renovation of buildings within the Sequoia High School Campus. 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 Measure AIR-1: Air District's Best Management Practices**.