

Initial Study and Preliminary Mitigated Negative Declaration

Menlo-Atherton High School Facilities Master Plan
555 Middlefield Road, Atherton, California

February 2, 2026

Prepared for

Sequoia Union High School District

1090 Mills Way, Redwood City, California 94063

Prepared by

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Initial Study and Mitigated Negative Declaration

California Environmental Quality Act (CEQA)

1.0 Project Information

Project Title:	Menlo-Atherton 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:	Menlo-Atherton High School 555 Middlefield Road, Atherton, California 94027
General Plan Designation:	Public Facilities and Schools

Project Overview

The proposed Facilities Master Plan (FMP) for Menlo-Atherton High School is intended to modernize existing campus facilities, improve overall functionality, and extend the useful life of aging infrastructure, without increasing student enrollment capacity. Key components include demolition of classroom buildings and construction of a new three-story, 30,000-square-foot classroom and student services building, along with associated site improvements, landscaping, and temporary swing space to support ongoing instruction during construction.

Additional proposed improvements include construction of a new approximately 8,500-square-foot weight room and physical education facility, as well as upgrades to stadium support facilities, including replacement of existing bleachers, construction of a new press box, and implementation of Americans with Disabilities Act (ADA) improvements. The proposed FMP also includes renovation of one existing classroom building and the current weight and training room.

Campus-wide improvements would incorporate sustainability and infrastructure upgrades, such as installation of photovoltaic panels, double-glazed windows, energy-efficient LED lighting, roofing upgrades, drainage improvements, and plumbing upgrades to existing restrooms. Future modernization efforts evaluated at a programmatic level include library renovations, modernization of science classrooms, installation of artificial turf on athletic fields, pedestrian safety enhancements, and development of new secure bicycle parking facilities.

Project Location

The project site is the 38-acre Menlo-Atherton High School campus located at 555 Middlefield Road, Atherton, California 94027, within San Mateo County (**Figure 1 – Project Location**). The

Project Information

campus is located at the northwest intersection of Middlefield Road and Ringwood Avenue in the Town of Atherton at the border with the City of Menlo Park.

The campus is located approximately 0.5 miles east of El Camino Real (State Route 82), approximately 1.5 miles west of U.S. Highway 101, and approximately 3 miles east of Interstate 280.

Surrounding Land Uses

The project site is primarily surrounded by a mix of residential, institutional, and office uses. Single-family homes are located to the north, east, and west of the campus. To the southeast, at the intersection of Middlefield Road and D Street, there are office buildings and associated surface parking lots. Directly south of the campus, at the southeast corner of Middlefield Road and Ravenswood Avenue, is the Christian Science Church.

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
- Town of Atherton 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, (CEQA); 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 Menlo-Atherton 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 Resources Code, Section 21000 et seq.).

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

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

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



Sertior, 2025

FIGURE 1

Project Location

Menlo-Atherton High School Facilities Master Plan

3.0 Project Description

3.1 Existing Conditions

The Menlo-Atherton High School, part of the Sequoia Union High School District (SUHSD or District), is a four-year public comprehensive secondary school. The Sequoia Union High School District consists of four comprehensive high schools and a continuation high school. The Menlo-Atherton High School serves the Town of Atherton and the cities of Menlo Park, Redwood City, East Palo Alto, and Portola Valley. Established in 1951, the school campus is approximately 38 acres and currently has approximately 126 regular and laboratory classrooms, 6 portable classrooms, a library, a performing arts center, athletic fields and courts, a pool, administrative offices, a performing arts center, and other academic and athletic-related facilities (**Figure 2 – Site Plan**). Building heights on campus range from one to two stories. Generally, classrooms and school administration buildings are located on the southern and western end of the campus and school athletic fields, including the football stadium and baseball fields, are located on the eastern and northern end of the campus. Tennis courts are located along Ringwood Avenue towards the southeast corner of the campus. The performing art center is located near the students’ drop-off and pick-up area within the southeast corner of the project site. The center includes a 492-seat theater used for school performances and community events.

Table 1, Menlo-Atherton High School Campus Existing Facilities, provides a detailed list of the campus buildings and their corresponding square footage. The location of these buildings is depicted on the campus map on **Figure 2**. As presented in Table 1, approximately 179,151 square feet of the campus’ total 286,561 square feet are dedicated to classroom space.

TABLE 1 – MENLO-ATHERTON HIGH SCHOOL CAMPUS - EXISTING FACILITIES

Building Name	Use	Size (Square feet)	Year of Construction
Administration Building	Administrative	5,230	Early 1950s; Renovated in 2000;
Teacher Resource Center or Staff Lounge	Administrative	2,680	2009
B-Wing North	5 Classrooms	3,900	1951-1955
B-Wing Central	4 Classrooms; College and Career Center;	7,050	1951-1955
B-Wing South	4 Classrooms	6,000	1951-1955
C-Wing North	6 Classrooms	7,460	1951-1955
C-Wing Central	7 Classrooms	6,000	1951-1955
D/E Wing North	14 Classrooms	13,960	Early to mid 1950s
D-Wing Central	8 Classrooms	6,000	1951-1955
D-Wing South	5 Classrooms	6,000	1951-1955
E-Wing Central	8 Classrooms	6,000	1951-1955
E-Wing South	8 Classrooms	6,450	1951-1955
F-Wing	12 Classrooms; Food Kiosk;	13,250	1993-1998

Building Name	Use	Size (Square feet)	Year of Construction
G-Wing	18 Classrooms; Staff Center;	47,431	2017
H Modulares	4 Classrooms	5,760	2014-2016
I-Wing	9 Classrooms; Ticket Booth;	9,890	2010-2012
P Modulares	6 Classroom;	5,760	2014-2016
Old Gymnasium/Locker Rooms	Classroom/Sports	36,000	1954
New Gymnasium	Classroom/Sports	17,000	2003
Food Service Building	Food Service	5,030	2017
Library	Library	10,470	1999
STEM Building	Classroom	17,400	2019
S-Wing Shops	Classroom	5,800	1951-1955
S-Wing Arts	Classroom	5,040	1951-1955
Performing Arts Center	Performing Arts	31,000	2009
TOTAL		286,561	

SOURCE: KITCHELL, 2025.

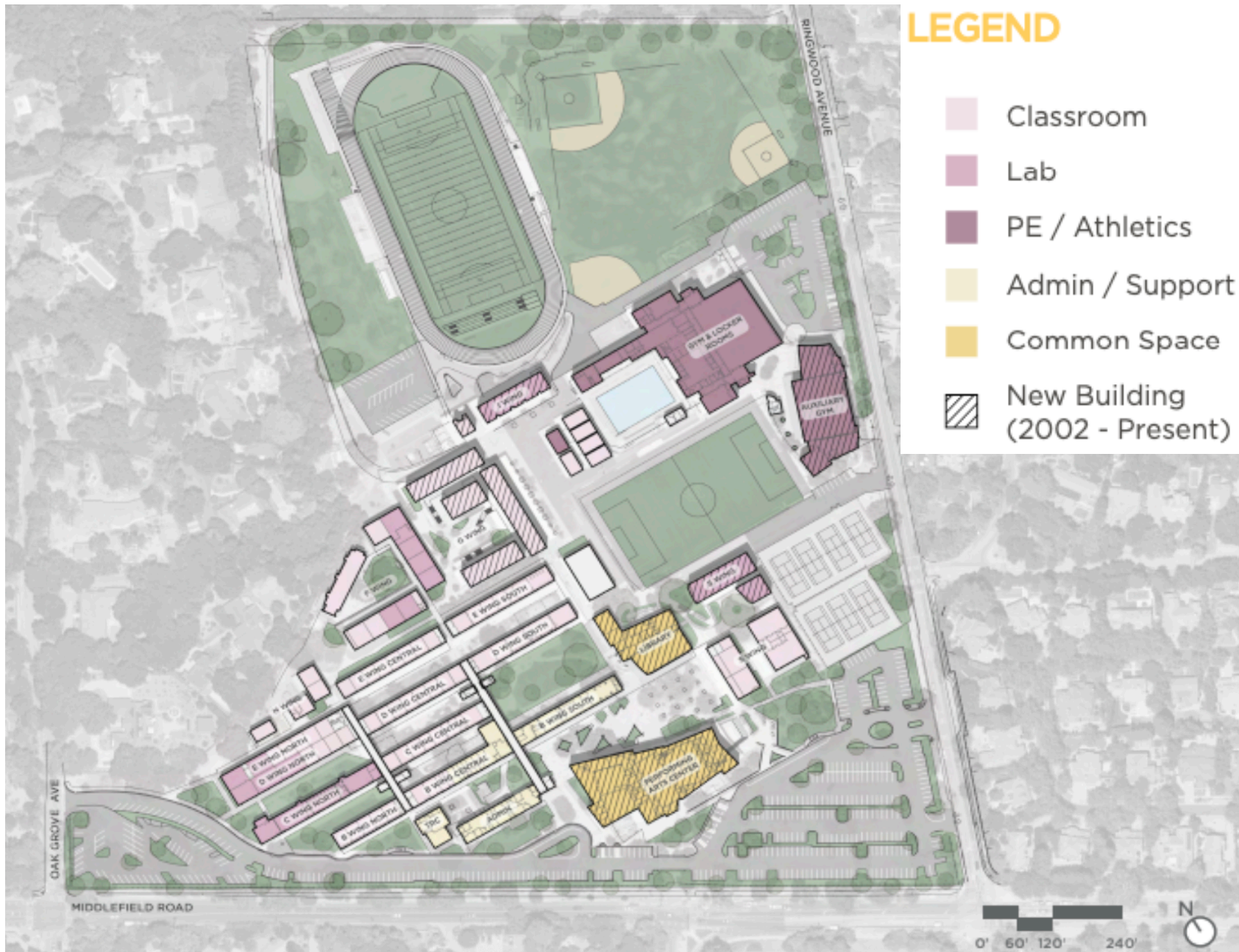
3.1.1 Access and Circulation

Vehicular access to the campus is provided via Ringwood Avenue and Oak Grove Avenue. The primary students’ drop-off and pick-up area is located on Ringwood Avenue near the southeastern edge of the campus, close to the intersection with Middlefield Road. A secondary drop-off and pick-up zone is also located along Ringwood Avenue, adjacent to the athletic facilities. An unpaved service road used primarily for maintenance vehicles runs along the northeastern perimeter of the campus and is accessible from Ringwood Avenue. Additionally, a paved service road runs along the northwestern boundary of the site, providing access to the football stadium.

Pedestrians and Bicycle Access. The campus includes multiple entry points for pedestrians and bicycles along Middlefield Road and Ringwood Avenue, which are distinct from vehicular access routes. An organized grid of internal pathways interlinks classroom buildings, administrative offices, and athletic facilities. These pathways converge around Pride Hall, which serves as the primary north-south axis of the campus.

Campus Vehicular Parking. Students with valid permits may park in two designated on-campus lots: the Senior Lot and the T-Lot, located adjacent to the Performing Arts Center and near the baseball field, respectively. A separate parking lot along the southern boundary of the campus, near Middlefield Road, is reserved exclusively for faculty and staff.

Bicycle Parking Facilities. The campus provides approximately 430 bicycle parking spaces, distributed across several secure locations, with 300 racks located near the tennis courts along Ringwood Avenue and 130 racks in the northwest corner of the staff parking lot at the intersection of Middlefield Road and Oak Grove Avenue. In addition, four bicycle cages are provided, including one cage in the staff parking along Oak Grove Avenue and four cages near the tennis courts.



Source: CAW Architects, 2023

FIGURE 2
Site Plan
Menlo-Atherton High School Facilities Master Plan

The school supports bicycle maintenance through the “Bike Shed,” a workshop established by a faculty member. This facility, located near the parking lot at Middlefield Road and Oak Grove Avenue, provides tools and services for bike repairs, promoting a bike-friendly campus culture.

3.1.2 Campus Landscape

In addition to the irrigated turf sports fields, the campus includes landscaped grassy lawns with picnic tables, and landscaped planter areas adjacent to concrete paths, along the sides of buildings, or within concrete courtyards between buildings. The planter areas are planted with various trees and shrubs, some of which are native trees such as coast live oak, valley oak, and coast redwood (Figure 2).

3.1.3 Campus Operations

As shown in Table 2 – Student Enrollment, Menlo-Atherton had an approximate enrollment of 2,158 students for the school year 2024-2025. The number of school staff for that same year was 160.

TABLE 2 - STUDENT ENROLLMENT

	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Menlo-Atherton High School	2,433	2,368	2,221	2,125	2,152	2,158
Sequoia Union High School District	9,052	9,055	8,743	8,599	8,553	8,516

SOURCES: California School Dashboard. <https://www.caschooldashboard.org/>. Accessed October 24, 2025.

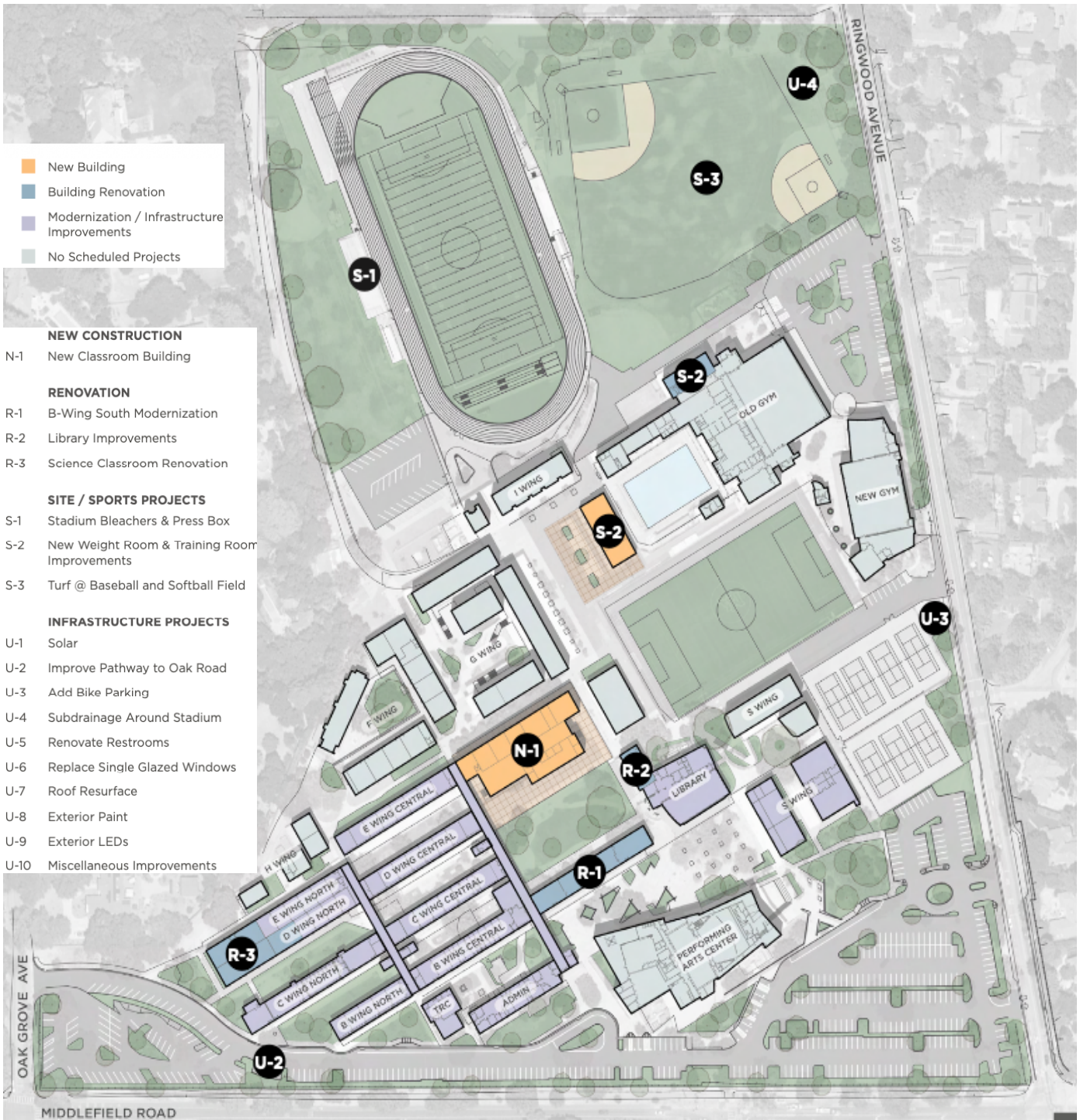
The school schedule is a modified block with three seven-period days of 50-minute periods and two block days with 85-minute periods. Most students are enrolled in six classes. The academic year typically begins in mid-August and concludes in the first week of June. Classes generally run from 8:30 a.m. to 3:45 p.m., with a later start time of 10:00 a.m. on Wednesdays.

3.2 Project Characteristics

3.2.1 Project Background

The proposed Facilities Master Plan (FMP) (proposed project) focuses on modernizing existing facilities, providing more flexible and adaptable learning spaces, and extending the functional lifespan of the campus infrastructure (Figure 3 – Proposed Facilities Master Plan).

The proposed FMP is not intended to expand the campus’s enrollment capacity. The proposed project would modernize, improve, or replace existing facilities and enhance functionality within the campus’s current operational footprint. The proposed FMP does not propose additional permanent classrooms or programmatic changes that would increase student enrollment.



Source: CAW Architects, 2023

FIGURE 3
Proposed Facilities Master Plan
Menlo-Atherton High School Facilities Master Plan

3.2.2 Proposed New Facilities

Redevelopment of E-Wing and D-Wing South Buildings

The proposed project involves the demolition of the existing one-story E-Wing South and D-Wing South buildings, along with associated canopy structures, and the construction of a new three-story building totaling approximately 30,000 square feet. The new facility would include 14 general education classrooms, two ceramics classrooms with an adjoining kiln room, and a student support services center. The proposed improvements would encompass approximately 47,000 gross square feet and include a terrace with integrated pathways below (Building N-1 on **Figure 3**).

Site improvements would include new landscaping, outdoor seating areas, and development of adjacent pathways to connect with existing pedestrian circulation routes on the north, west, and east sides of the new classroom building. The proposed project would also extend the existing student quad (Pride Hall) southward and address structural upgrades to the remaining portion of the hall following the demolition of the E-Wing South and D-Wing South buildings.

As part of the proposed project, a temporary swing space would be installed in the paved space located southwest of the stadium to accommodate classroom functions during the construction of the new building. The swing space would consist of modular structures. This temporary facility would ensure the continuity of academic operations and minimize disruption to students and staff during the construction period. The temporary swing space would be removed after the construction of the new classroom building is completed.

New Weight Room

The proposed project would include the construction of a new weight room and physical education classroom building on the turf area south of the baseball field (Building S-2 on **Figure 3**). The development of the new one-story, approximately 8,500-square-foot building, would include exterior landscape and would relocate the existing trash enclosure to the student parking lot south of the tennis court.

Stadium Bleacher and Press Box

The proposed project would improve the stadium support facilities by demolishing the existing concrete bleachers and the adjacent Americans with Disabilities (ADA)-compliant concrete platform, and installing aluminum bleachers and a press box. The new stadium facilities would have electrical power for air conditioning, fire alarm, and security systems.

Improvements associated with the new stadium support facilities would include new lighted pedestrian pathways, as well as audio and video streaming to the new press box. Additionally, the proposed project would improve nearby sanitary facilities by upgrading existing restrooms and installing new drinking water fountains (structure S-1 on **Figure 3**).

3.2.3 Proposed Renovations

B-Wing South Building

The proposed project would include the renovation of the 6,300-square-foot B-Wing South building by reconfiguring the interior space to create new student support services and flexible spaces. Renovation activities would include new pathways between the student quad and the outdoor space north of the Performing Arts Center. The quad space fronting the B-Wing South building would be improved to connect with existing pathways on the south and east sides (Building R-1 on **Figure 3**).

Existing Weight Room and Training Room

The proposed project would renovate the existing weight room and training room that is part of the old gymnasium, located south of the stadium (S-2 on **Figure 3**). The proposed renovation would be to the interior of the existing 2,600-square-foot weight room and training room to convert the space into a new training room and two team rooms.

3.2.4 Other Miscellaneous Improvements

The proposed project includes a variety of miscellaneous improvements and upgrades to the existing buildings and infrastructure.

- Installation of photovoltaic (solar) panels on selected building rooftops and new shade structures to offset increased cooling demands and support the District's long-term sustainability goals.
- Improvements to subsurface drainage infrastructure beneath the fire access road surrounding the stadium, with connections to the existing campus drainage system.
- Upgrades to plumbing systems and renovations to support the potential conversion of existing facilities to restrooms.
- Installation of double-glazed windows to improve thermal performance and reduce energy loss, enhancing the efficiency of the new HVAC system.
- Roofing upgrades to protect the long-term integrity of campus buildings.
- Exterior paint to restore and repair exterior building finishes, improve aesthetics, and prolong building life.
- Replacement of outdated exterior fluorescent lighting with energy-efficient LED fixtures, and installation of additional LED lighting as needed to enhance safety and visibility.

The following miscellaneous improvements are proposed for construction at a later date that is undetermined. Therefore, these improvements are evaluated in this document at a programmatic level. If additional information becomes available that warrants further environmental analysis, such analysis would be conducted in accordance with CEQA requirements.

- Interior renovations to the library to create flexible work "pods" with clear sightlines for supervision, and installation of large glazed operable partitions along the quad-facing façade to provide a welcoming and open connection to outdoor student spaces.

- Modernization of outdated science classrooms to align with current District educational standards and teaching methodologies.
- Replacement of natural grass with artificial turf at the baseball and softball fields to reduce maintenance and water use.
- Enhanced pedestrian safety through the creation of a clearly defined walkway connecting the campus core to Oak Grove Avenue, traversing the existing parking area.
- Development of a secure, fenced bicycle parking area to promote alternative modes of transportation (final location to be determined).

3.2.5 FMP Project Construction

Schedule

Project construction is anticipated to begin in the summer 2026 and last approximately 4 years until Summer 2030. The FMP construction schedule includes several sequential and overlapping projects. Construction of the stadium bleachers and press box is anticipated to begin in summer 2026 and conclude by fall 2026. Redevelopment of the E-Wing and D-Wing South buildings and the new weight room addition is scheduled to commence in summer 2027 and continue through summer 2029. In parallel, the construction of the new weight room and the renovation of the existing weight room and training room is scheduled from summer 2027 to fall 2028. The modernization of the B-Wing South building is planned to start in summer 2029 and be completed by summer 2030.

The construction schedule for the miscellaneous improvements is also planned to occur in phases over several years. Drainage upgrades beneath the stadium fire access road and the replacement of exterior lighting with energy-efficient LEDs are scheduled to begin in summer 2026. Installation of photovoltaic panels is anticipated between 2027 and 2029. Additional improvements, including roof upgrades, exterior painting, installation of double-glazed windows, and plumbing renovations to accommodate restrooms, are expected to be phased over multiple summers starting in 2027.

Construction Activities

Construction activities of new buildings would involve site preparation that would include demolition, grading, and staging of construction equipment and trailers, among other site preparation activities in the zoned areas planned for construction. Additionally, construction of new buildings would include the installation of new utilities, including water, sewer, and electrical services. It would also 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 building. Construction of the temporary swing spaces would require utility trenching between the existing building and the designated area southwest of the stadium.

Demolition of existing structures throughout the project site would generate approximately 13,000 cubic yards of debris. Project construction may require excavation of up to 1,000 cubic yards of soil or asphalt materials. The project would include placement of approximately 1,000 cubic yards of imported soil.

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 to the proposed renovation activities.

The proposed project would implement the District's Standard Construction Measures (SCM) for controlling construction noise (SCM-7) (**Section 3.2.6 – District Standard Construction Measures**). In addition, the proposed project would limit outdoor construction activities to the hours of 8:00 a.m. to 5:00 p.m. on weekdays. Indoor or renovation work may occur outside these hours, including on weekends. No outdoor construction is permitted on Saturdays, Sundays, or holidays.

Construction Access

Construction access to the project site would be via the access driveways at Ringwood Avenue, as shown on **Figure 4 – Construction Access**. No road or lane closures are anticipated during project construction.

Workforce and Truck Trips

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

Construction 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 3.2.6 – District Standard Construction Measures**), the proposed project will use construction equipment with low diesel particulate matter (DPM) emissions. All diesel-powered equipment over 50 horsepower operated on-site for more than two consecutive days or 20 total hours will meet U.S. EPA Tier 4 Interim standards.

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

Sustainable features

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

3.2.6 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 Title 13 CCR sections 2449, 2449.1, and 2449.2, which requires providing Certificate(s) of Reported Compliance for In-Use Off-Road Diesel-Fueled Fleets.
- Employing Verified Diesel Emission Control Strategies (VDECS), such as diesel particulate filters, and low emissions fuel.

SCM-2: BIOLOGICAL RESOURCES. Prior to the start of construction, all project sites and the immediately surrounding areas shall be screened to determine whether biological resources could be affected by project activities. A qualified biologist shall conduct a biological survey, as appropriate, to document existing site conditions and identify the presence or potential habitat for special-status species, migratory birds, and other sensitive biological resources.

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

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

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

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

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

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

- I. **Alert Sheet:** Prior to any soils disturbing activities, the District shall distribute the "CULTURAL RESOURCES ALERT Sheet" to each project contractor or vendor involved in project-related soils disturbing activities; ensure that each contractor circulates it to all field personnel; and provide the District with a signed affidavit from each contractor confirming distribution to all field personnel.
- II. **Archaeological Resources Screening:** Projects involving ground disturbance will initially be screened to identify whether there is demonstrable evidence of prior ground disturbance in the project site to the maximum vertical and horizontal extent of the current project's planned disturbance.

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

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

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

- **Work Suspension.** Should a potential archaeological resource be encountered during project soils disturbing activity, with or without an archaeological monitor

present, the project Head Foreman shall immediately suspend soils disturbing activities within 50 feet of the discovery, protect the find from further disturbance, and immediately notify the District Project Manager.

- **Assessment:** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (36-CFR 61), in consultation with the District, shall document the find, evaluate based on available information whether it qualifies as a significant historical resource under the CEQA criteria, and provide recommendations for additional treatment as warranted. The District will consult with the qualified archaeologist on these recommendations and may require implementation of additional measures, such as preparation and implementation of an Archaeological Monitoring Plan, a Subsurface Testing Plan, and/or an Archaeological Data Recovery Plan, and including associated research designs, descendant group consultation, other reporting, curation, and public interpretation of results.
- An **Archaeological Monitoring Plan (AMP)** shall be prepared and implemented within areas determined during preliminary investigation to be highly sensitive or upon a discovery during construction. The AMP shall include the following elements:
 - Historical context and research design for assessment of resource types likely to be encountered;
 - Project activities to be archaeologically monitored and schedule of monitoring of each type and location of project construction activity; and
 - Procedures for the documentation, significance and integrity assessment, interpretation and reporting of the types of resources likely to be treatment, encountered.
- **Monitoring Process.** The archaeological monitor will have the authority to halt construction activity at the location of a suspected resource for inspection, documentation, and assessment of the need for further measures, such as archaeological resources testing and recovery. The Archaeological Monitor shall record and collect soil samples, as warranted, for analysis. At the end of construction, whether or not significant archaeological resources are encountered, the archaeological consultant shall prepare a report of the findings of the monitoring.
- **Subsurface Testing Plans and Data Recovery.** In the event of a discovery during construction, if the District and archaeological consultant determine that the discovery is a significant resource that will be adversely affected an archaeological field investigation will be conducted to determine whether the discovered resource retains depositional integrity and whether it qualifies as a legally significant resource under CEQA criteria.
 - Subsurface Testing Plan. If an archaeological investigation is required in order to verify resource location and/ or assess the significance of the resource, the archaeological consultant shall prepare and implement an Subsurface Testing Plan (STP) that identifies:
 - Key research goals and associated data requirements,

- Survey and testing/ sampling methods,
- Laboratory and analytical methods, and
- Reporting structure
- **Treatment.** If, based on the STP results, the District finds that significant archaeological resources may be present, preservation in place is the preferred manner of mitigating impacts, as detailed in CEQA Guidelines 15126.6(b) (3)(a) and (b). If preservation in place is determined to be infeasible, the District at its discretion shall either:
 - Re-design the proposed project so as to reduce the adverse effect to a less-than-significant level through preservation in place or other feasible measures; and/or
 - Document and/or recover the resource for interpretive use, at the discretion of the District, and/or;
 - For archaeological resources that would require recovery, the District shall prepare an archaeological data recovery program, that will identify how the archaeological resource will be recovered and preserved.
- **Archaeological Resources Reports.** For projects in which a significant archaeological resource is encountered and treated during project implementation the archaeological consultant shall submit an Archaeological Resources Report to the District that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing, monitoring, and data recovery program. Once approved by the District, copies of the Archaeological Resources Report shall be submitted to the California Historic Resources Information System (CHRIS), one copy to each descendant group involved in the project (if applicable), and documentation to the District of transmittal of the above copies.
- **Human Remains, Associated or Unassociated Funerary Objects.** The District shall ensure that human remains and associated or unassociated funerary objects discovered during any soils disturbing activity are treated in compliance with applicable State and federal laws. In the event of the discovery of potential human remains, the construction contractor shall ensure that construction activity within 50 feet of the find is halted and the District PM and the County Coroner are notified immediately. If the Coroner determines that the remains are of Native American origin, he/she will notify the California State Native American Heritage Commission. Subsequent consultation on and treatment of the remains will be conducted consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(d), in consultation with the District.
- **Consultation with Descendant Communities.** Consistent with AB 52 requirements, if requested, the District shall provide opportunities for Native American descendant groups to provide input during project planning for projects that may affect potential Tribal Cultural Resources. In addition, on discovery during construction of an archaeological site associated with descendant Native Americans, the District shall contact an appropriate representative of the descendant group. The

District will consult with the representative regarding the appropriate treatment, management, and, if applicable, interpretation of the site and any recovered materials, and as needed, will provide the opportunity to monitor archaeological field investigations at the site.

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

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

If the assessment identifies the presence of hazardous materials, the District shall prepare and implement a Hazardous Materials Management Plan or equivalent remediation plan to ensure that such materials are properly treated, contained, or removed in accordance with all applicable local, State, and federal regulations, including those enforced by the California Department of Toxic Substances Control, Regional Water Quality Control Board, San Mateo County Environmental Health Services Division, and California Occupational Safety and Health Administration (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.

3.2.7 Project Operations

As described in **Section 3.2.1, Project Background**, the proposed FMP is focused on modernizing existing campus facilities and would not involve expanding the school's 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.



FIGURE 4
Construction Site Access
Menlo-Atherton High School Facilities Master Plan

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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).

<input type="checkbox"/> Aesthetics	<input type="checkbox"/> Agriculture and Forest Resources	<input checked="" type="checkbox"/> Air Quality
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Energy
<input checked="" type="checkbox"/> Geology / Soils	<input type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Hazards / Hazardous Materials
<input type="checkbox"/> Hydrology / Water Quality	<input type="checkbox"/> Land Use / Planning	<input type="checkbox"/> Mineral Resources
<input type="checkbox"/> Noise	<input type="checkbox"/> Population / Housing	<input type="checkbox"/> Public Services
<input type="checkbox"/> Utilities / Service Systems	<input checked="" type="checkbox"/> Tribal Cultural Resources	<input type="checkbox"/> Wildfire
<input checked="" type="checkbox"/> Mandatory Findings of Significance		

5.0 DETERMINATION

On the basis of this initial evaluation:

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

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

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

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

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

Signature: _____

Date

03/09/2026

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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. Such alterations could be positive or negative, depending on the characteristics of individual future developments and the subjective perception of observers. Scenic vistas are generally interpreted as long range views, while scenic corridors are considered public views as seen along a linear transportation route and scenic vistas are views of a specific scenic feature. There are no designated 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 the California Scenic Highways Program.¹ I-280 is located approximately 3.8 miles southwest of the project site and the project site is not visible from the highway.

¹ California Department of Transportation. California State Scenic Highway System Map. <https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>. Accessed August 25, 2025.

The circulation element of the Town of Atherton requires all streets in the Town of Atherton to be preserved as scenic routes.²

The proposed project is the implementation of a school Facilities Master Plan to improve the existing use of the project site for current and future needs primarily by replacing classroom buildings, renovating existing building, and improving sports facilities on an existing school site. The proposed project would include replacing the existing one-story E-Wing South and D-Wing South buildings with a new three-story building. Proposed new facilities and structures would also include a one-story weight room, replacement of the existing bleachers at the stadium, and construction of a press box. All proposed new buildings and improvements would be located within the interior of the campus, set back from the site boundaries, and therefore would not be visible from the outside. The proposed three-story building, which would replace the existing one-story E-Wing and D-Wing South buildings, would be located in the center of the campus. It would not be visible from outside the campus and would not obstruct any existing views. Construction equipment would also not be visible and all construction staging would be within the project site.

Due to existing development and the surrounding landscape, views are generally limited to one or two blocks in each direction when traveling on foot or in a vehicle around the site boundaries. Additionally, long-range views from the project site are obscured by trees and existing development. The proposed project would not obstruct views from public areas nor alter the visual character of the surrounding area. Therefore, it would have a **less-than-significant** impact on visual quality and scenic views.

- 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 the project site is I-280, located approximately 3.8 miles to the southwest. The project site is not visible from the officially designated state scenic highway. Therefore, the proposed project would not damage scenic resources within a state scenic highway. There would be **no impact**.

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

Light pollution in most of the project area is minimal, and is restricted primarily to street lighting along Middlefield Road, and to night-time illumination of commercial buildings. No new significant night lighting is proposed as part of the proposed project, except for light fixtures for pedestrian pathways to enhance safety and visibility. Exterior light would be energy-efficient LED 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**.

² Town of Atherton. 2018. Circulation Element of the General Plan.
https://www.ci.atherton.ca.us/DocumentCenter/View/6068/GP-Update-Circulation-Element_Final-PC-Packet.
Accessed August 27, 2025.

6.2 Agriculture and Forest Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>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.</p> <p>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.</p> <p>Would the project:</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.2.1 Environmental Setting

The project site is located at the border of the Town of Atherton and the City of Menlo Park and all proposed project improvements would occur within an existing developed area. The project site is identified on the Farmland Mapping and Monitoring Program as Urban and Built-up Land,³ defined as “Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other

³ 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 August 28, 2025.

Agriculture and Forest Resources

transportation 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 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 proposed project would not convert or cause the conversion of any farmland or forest land to a non-agricultural/non-forest use because the project site is within urban and built-up land surrounded by urban uses. Thus, 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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 (O₃), nitrogen dioxide (NO₂), respirable particulate matter with a diameter less than 10 microns (PM₁₀), sulfur dioxide (SO₂), and lead (Pb). In 1997, The U.S. Environmental Protection Agency (EPA) added fine particulate matter (PM_{2.5}) as a criteria pollutant. The air pollutants for which standards have been established are considered the most prevalent air pollutants known to be hazardous to human health. California ambient air quality standards (CAAQS) include the NAAQS pollutants and also hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles. These additional CAAQS pollutants tend to have unique sources and are not typically included in environmental air quality assessments. In addition, lead concentrations have decreased dramatically since it was removed from motor vehicle fuels. The Bay Area has attained the CO standard and monitoring data from the last 30 years show relatively low concentrations throughout the Bay Area. Therefore, CO is not an air quality issue for land use type projects such as the proposed project.

Air Pollutants of Concern

There are two categories of pollutants analyzed for 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 ($\text{PM}_{2.5}$). Elevated concentrations of PM_{10} and $\text{PM}_{2.5}$ 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 $\text{PM}_{2.5}$ exposure even at low concentrations, the Bay Area Air District (Air District)⁴ has developed health risk thresholds to address exposure to increased $\text{PM}_{2.5}$ concentrations caused by projects.

Toxic Air Contaminants (TACs)

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

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

⁴ Also known as the Bay Area Air Quality Management District (BAAQMD).

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

Sensitive Receptors

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

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

The Air District oversees compliance with State and Federal air quality regulations 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*.⁵ 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 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 Plan measures since the project would have emissions below the Air District thresholds. This impact would be ***less than significant***.

⁵ Bay Area Air District (Air District), 2017. Final 2017 Clean Air Plan.

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

The San Francisco Bay Area is considered a non-attainment area for ground-level O₃ and PM_{2.5} under both the NAAQS and the CAAQS. The area is also considered non-attainment for PM₁₀ 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 O₃, PM_{2.5} and PM₁₀, the Air District has established thresholds of significance for these air pollutants and their precursors. The O₃ precursor pollutant thresholds are for ROG and NO_x, while PM₁₀, and PM_{2.5} have specific thresholds. The thresholds apply to both construction period emissions and operational period emissions.

In addition to complying with the District's Standard construction Measures for air quality (SCM-1) (**Section 3.2.6, District Standard Construction Measures**), the proposed project has committed, where feasible, to using construction equipment that meets U.S. EPA Tier 4 Interim emission standards for particulate matter, or to using alternatively-fueled equipment, as described in **Section 3.2.5, FMP Project Construction**. This would apply to construction equipment larger than 50 horsepower used at the site for more than two continuous days or 20 hours total.

Construction Period Emissions

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

Land Uses. The air quality modeling focused on construction activities expected to generate the greatest emissions. Other activities, such as renovations or minor improvements, would produce substantially lower emissions and generally do not involve diesel-powered equipment. The significance of project-related air quality impacts is based on average daily emissions, and the activities included in the modeling are those that would result in the highest daily emissions. Key construction elements include new classroom building, weight room, new bleachers, a press box, and replacement of natural grass with artificial turf at the baseball and softball fields. These projects would occur in phases, as described in **Section 3.2.5, FMP Project Construction**. Separate CalEEMod runs were conducted for each phase. The land uses for each phase were entered into CalEEMod, as described in **Table 3 – Summary of Project Land Use Inputs**.

TABLE 3 - SUMMARY OF PROJECT LAND USE INPUTS

Project Land Uses ¹	Size	Units	Square Feet (sf)	Acreage
Fields Turf (2026) ³				
City Park	2.50	Acre	-	2.5
Bleachers and Press Box (2026)				
City Park	0.50	Acre	-	0.5
Classroom Building (2027)				
High School	28	1,000-sf	30,000 ²	1
Other Asphalt Surfaces	1	1,000-sf	-	
Weight Room Addition (2027)				
High School	4.5	1,000-sf	8,500 ²	0.5

Source: Illingworth and Rodkins, 2025

NOTES:

¹ "Projected Land Uses" are the land use type defined by CalEEMod.

² The analysis was based on a weight room size of 4,500 sf that was subsequently changed to 8,500 sf. Based on the CalEEMod inputs, emissions would not change substantially.

³ To account for emissions of the FMP improvement projects addressed at a programmatic level, this analysis conservatively assumed that replacement of the natural grass with artificial turf at the baseball and softball fields would occur in 2026.

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 date for the replacement of natural grass with artificial turf at the baseball and softball fields and construction of the bleachers and press box would be June 2026 and for the new classroom building and the new weight room would be June 2027.⁶ The CalEEMod defaults calculated that the improvements to the sports field turfs, bleachers, and press box would be built out over a period of approximately 5 months and the new classroom building and the new weight room would be built out over a period of approximately 6 months, for a non-consecutive total of 11 months or 240 construction workdays. The earliest full year of operation was assumed to be 2028.

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

⁶ To account for emissions of the FMP improvement projects addressed at a programmatic level, this analysis is conservatively assuming that replacement of natural grass with artificial turf at the baseball and softball fields would occur in 2026.

Summary of Computed Construction Period Emissions

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM10 and PM2.5. Sources of fugitive dust include disturbed soils at the construction site and trucks carrying uncovered loads of soil. Vehicles leaving the site could deposit mud on local streets, which could become an additional source of airborne dust once dried.

The Air District recommends that all projects implement a “basic” set of BMPs to manage fugitive dust, and considers impacts from dust (i.e., fugitive PM10 and PM2.5) to be less than significant if these BMPs are applied. Consistent with these recommendations, the proposed project would implement **Mitigation Measure AIR-1: Air District’s Best Management Practices**, which requires the use of basic BMPs to reduce fugitive dust.

TABLE 4 - CONSTRUCTION PERIOD EMISSIONS

Year	ROG	NOx	PM ₁₀ Exhaust	PM _{2.5} Exhaust
<i>Construction Emissions Total (Tons)</i>				
2026 (Sports Field Turfs ¹ + Bleachers and Press Box)	0.01	0.42	<0.01	<0.01
2027 (classroom building and the new weight room addition)	0.19	0.61	<0.01	<0.01
<i>Average Daily Construction Emissions (pounds/day)</i>				
2026 (113 construction workdays)	0.24	7.43	0.05	0.05
2027 (127 construction workdays)	3.04	9.58	0.07	0.07
<i>Air District Thresholds (pounds per day)</i>	54 lbs./day	54 lbs./day	82 lbs./day	54 lbs./day
Exceed Threshold?	No	No	No	No

Source: Illingworth and Rodkins, 2025

NOTE: ¹ To account for emissions of the FMP improvement projects addressed at a programmatic level, this analysis conservatively assumed that replacement of the natural grass with artificial turf at the baseball and softball fields would occur in 2026.

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 – Construction Period Emissions shows the average daily construction emissions of ROG, NOX, PM10 exhaust, and PM2.5 exhaust during project construction with **Mitigation Measure AIR-1** applied. As shown in **Table 4**, predicted average project construction emissions would not exceed the Air District’s significance thresholds. With implementation of the BMPs outlined in **Mitigation Measure AIR-1**, uncontrolled fugitive dust emissions from construction would remain below the Air District’s single-source threshold. Therefore, 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 toxic air contaminants or 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 long-term increase in traffic since it would not result in increased college capacity and associated increased enrollment.

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 related to projects' construction 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 on **Figure 5 – 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 measurements from the San Carlos Airport indicate that prevailing winds generally blow from the west-northwest to the east-southeast. The project's temporary construction health risk impacts would likely be greatest at one of the single-family residences that are east/south-

east of the construction sites. The temporary construction health risk impacts at the students on-campus would be less than off-site residences due to less intensive cancer risk exposure factors and not being on-campus during the summer when some construction activities would occur.

The CalEEMod model provided total uncontrolled annual PM₁₀ exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. Total uncontrolled DPM emissions were estimated to be 0.03 tons (69 pounds) and fugitive dust emissions (PM_{2.5}) were estimated to be 0.03 tons (67 pounds). As described in **Section 3.2.5, 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**, as discussed under criterion (a) above. 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 greatly decrease the health risk impacts from the project’s temporary construction activities on the nearby estimated maximally exposed individuals (MEIs) and sensitive receptors, both residential and school receptors.

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

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

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

Note: ROG = reactive organic gases, NO_x = nitrogen oxides, PM₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, PM_{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. VMT = vehicle miles traveled.

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

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

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

A review of the project area using the Air District's geographic information systems (GIS) screening maps identified the existing health risks from nearby roadway and stationary sources at the estimated MEIs. The local roadways and one existing stationary source of TACs were identified with the potential to affect the estimated MEIs. **Figure 5** shows the locations of the sources affecting the estimated MEIs within the influence area. Health risk impacts from these sources upon the estimated MEIs are reported in **Table 6 - Impacts from Combined Sources at Estimated MEIs**.

Nearby Local Roadways

The project site is located in a residential area with nearby local streets. Cancer risk, PM_{2.5} concentrations, and Health Index (HI) associated with traffic on the nearby roadways were estimated using the Air District screening values provided via GIS data files (i.e., raster files).⁷ The Air District raster files provide screening-level cancer risk, PM_{2.5} concentrations, and HI for roadways within the San Francisco Bay Area and were produced using AERMOD and 20x20-meter emissions grid. These raster data are based on region-wide emissions rather than just those that occur within 1,000 feet of the project. The Air District's analysis uses EMFAC2021 data for vehicle emissions and fleet mix for roadways and provides guidance for risk assessment assumptions.⁸ These estimates represent conservative risks reflective of 2022 conditions and are meant to provide a conservative estimate of future conditions, which do not reflect the increased proportion of zero emission motor vehicles that will result in lower future emissions.⁹ These screening values are considered higher than values that would be obtained with refined modeling methods. Screening-level cancer risk, PM_{2.5} concentration, and HI for the cumulative roadway impacts at the estimated MEIs are listed in **Table 6 - Impacts from Combined Sources at Estimated MEIs**.

Bay Area Air District Permitted Stationary Sources

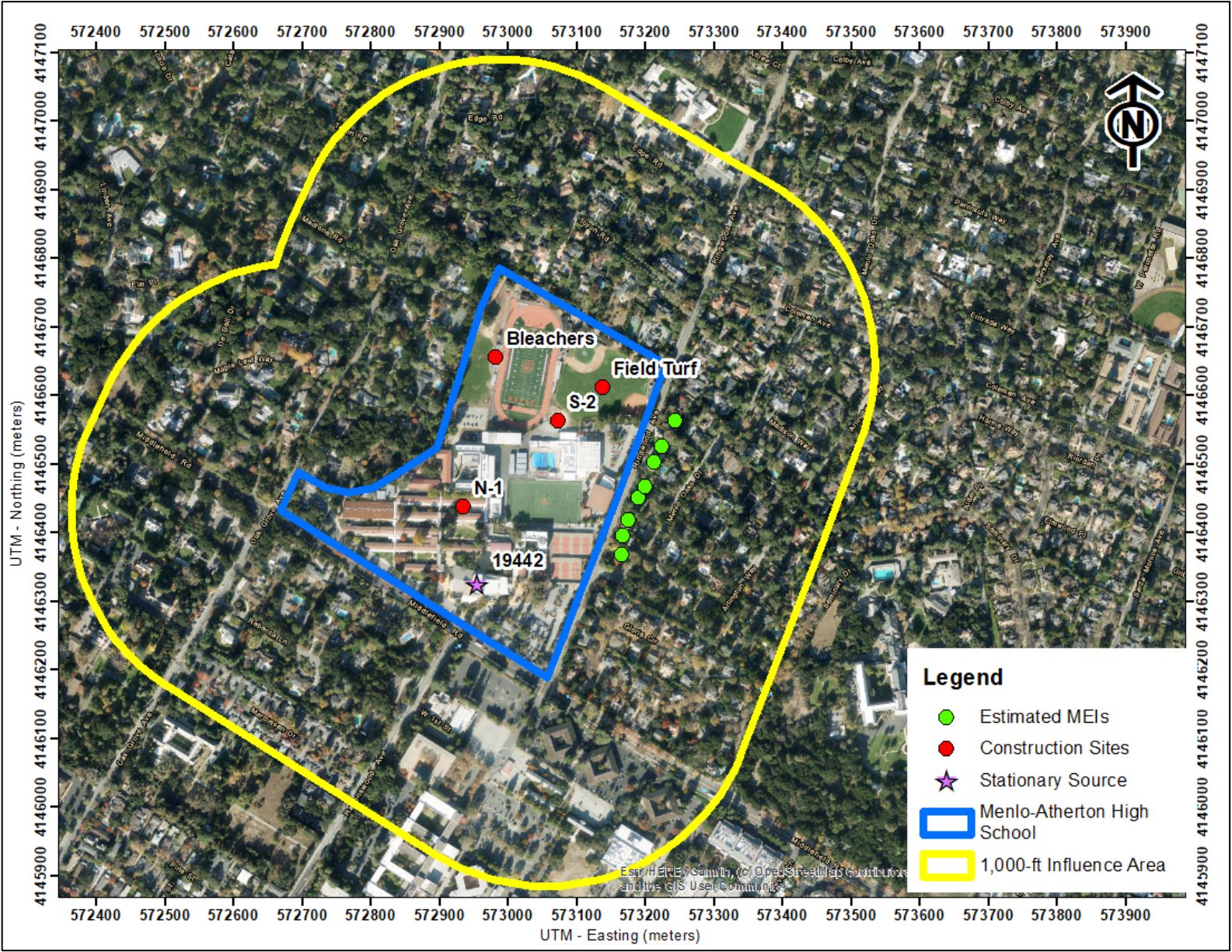
Permitted stationary sources of air pollution near the project site were identified using the Air District's Permitted Stationary Sources 2022 GIS website,¹⁰ which identifies the location of nearby stationary sources and their estimated risk and hazard impacts, including emissions and adjustments to account for OEHHA guidance. One source was identified using this tool; a diesel-powered generator. The Air District GIS website provided screening risks and hazards for the generator source. Health risk impacts from the stationary source upon the estimated MEIs are reported in **Table 6**.

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

⁸ Air District's CEQA Air Quality Guidance (Appendix E)

⁹ Bay Area Air District, 2022 CEQA Air Quality Guidelines Appendix E, Section 9, April 2023.

¹⁰ Bay Area Air District, <https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=845658c19eae4594b9f4b805fb9d89a3>



Source: Illingworth & Rodkin, 2026

FIGURE 5
 Location of Project's Maximum Exposed Individual Receptors
 Menlo-Atherton High School Facilities Master Plan

Summary of Cumulative Health Risk Impact at Project MEI

Both the project and cumulative health risk impacts at the sensitive receptors most affected by construction (i.e., the MEI) are presented in Table 6. As described in Section 3.2.5, 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.

For the reason presented above, the project’s temporary construction health risk impact on sensitive receptors 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. Odors from 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**.

TABLE 6 - IMPACTS FROM COMBINED SOURCES AT ESTIMATED MEIS

Source	Cancer Risk (per million)	Annual PM _{2.5} (µg/m ³)	Hazard Index
Project Impacts			
Project Construction	<10.0	<0.3	<1.0
BAAQMD Single-Source Threshold	>10.0	>0.3	>1.0
Exceed Threshold?	No	No	No
Cumulative Impacts			
Cumulative Roadways – Air District Screening GIS Data	9.05	0.23	0.04
Sequoia Union High School District (Facility ID # 19442, Generator)	3.15	-	-
Cumulative Total	<22.20	<0.53	<1.04
BAAQMD Cumulative Source Threshold	100	0.8	10.0
Exceed Threshold?	No	No	No

Source: Illingworth and Rodkins, 2025

6.4 Biological Resources

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.4.1 Environmental Setting

The analysis of biological resources presented below is based on a survey of the project site conducted on March 31, 2024 and a search of the most recent version of the California Department of Fish and Wildlife (CDFW) Natural Diversity Database (CNDDDB) and the California Native Plant Society’s (CNPS) *Inventory of Rare and Endangered Plants of California*.¹¹ The records search results are included in **Appendix B** of this Initial Study.

Existing Landcover Types, Vegeration Communities, and Habitat

The project site's landcover is entirely anthropogenic, consisting of concrete hardscape and landscaped areas. These landscaped areas include regularly maintained, irrigated turf sports fields, grassy lawns, and planter areas. The planter areas feature a variety of ornamental trees

¹¹ Monk and Associates. 2025. Biological Resources Analysis. Menlo-Atherton High School Facilities Master Plan Project. Atherton, California. July 7.

and shrubs. Native trees on the site include coast live oak (*Quercus agrifolia* var. *agrifolia*), valley oak (*Quercus lobata*), and coast redwood (*Sequoia sempervirens*). Ornamental trees include cherry plum (*Prunus cerasifera*), ginkgo (*Ginkgo biloba*), olive (*Olea europaea*), and camphor (*Cinnamomum camphora*). Shrubs like oleander (*Nerium oleander*), mirror bush (*Coprosma repens*), and Japanese camellia (*Camellia japonica*) are also present. Some less-managed areas along the northern and eastern boundaries contain weedy herbaceous species.

The developed habitats on site support common wildlife species adapted to human presence. Birds observed during the March 31, 2025, survey included the American Crow (*Corvus brachyrhynchos*), European Starling (*Sturnus vulgaris*), Bushtit (*Psaltriparus minimus*), Dark-eyed Junco (*Junco hyemalis*), and House Finch (*Haemorhous mexicanus*). Mammals such as the Western gray squirrel (*Sciurus griseus*) and Fox squirrel (*Sciurus niger*) were also observed.

Special-Status Species

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

- **Special-Status Plants:** One special-status plant species is known to occur in the project area, but its habitat is not present on the site, such as chaparral, coastal prairie, or marshes.
- **Special-Status Animals:** A total of 20 special-status animal species are known to occur in the region. The only species with a potential to occur at the project site is Crotch's bumblebee. The project site is not within designated critical habitat for the California red-legged frog, and no suitable aquatic or upland dispersal habitat exists on site. The site's fencing and busy roads are significant barriers to movement for this species.

Nesting Birds

Nesting birds of common species may utilize trees, shrubs, and buildings on the site for nesting. All migratory birds are protected under the federal Migratory Bird Treaty Act and California Fish and Game Code. While the presence of large trees on site could provide potential nesting habitat for urban-adapted raptors, the frequent ongoing disturbance within the project area substantially reduces the likelihood of nesting. However, large trees and shrubs do provide potential nesting habitat for passerine (perching) birds.

Sensitive and Regulated Plant Communities and Habitats

There are no sensitive or regulated plant communities, wetlands, or other waters of the U.S. or State on the project site.

- a) *Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service?*

Special-Status Plant Species. As described above, 20 special-status plant species have been documented in the broader project region. However, the majority of these species are restricted to specialized habitats such as chaparral, coastal prairie, vernal pools, and freshwater or coastal salt marshes, none of which are present within the project site. Given the fully developed and landscaped condition of the site, the potential for special-status plant species to occur is considered extremely low.

Special-Status Animal Species. A total of 20 special-status wildlife species have been documented within the project region. Given the highly developed condition of the project site, which functions as an active high school campus, the majority of these species are not expected to occur onsite. However, the site landscaping and ruderal vegetation, provide marginally suitable habitat for the Crotch's bumblebee (*Bombus crotchii*), a candidate for state listing as endangered or threatened (no federal status). Considering this is a mobile species and there are recent records of occurrence within 5 miles,¹² there is a potential for this species to be present on site. Potential project impact to Crotch's bumblebee from project construction would be significant. The proposed project would implement **Mitigation Measure BIO-1a**, identified below, which require a pre-construction survey to reduce potential impact on the crotch's bumblebee.

Nesting Birds. Due to the high level of disturbance on the project site and the surrounding high-density commercial/residential area, urban-adapted songbirds such as American crow, bushtit, and European starling could nest on the project site and raptors could nest in tall trees along the northern boundary of the project site and in the surrounding area. These songbirds and raptors (birds of prey) are protected by the Migratory Bird Treaty Act. Therefore, potential project impact on these species during construction would be significant. The proposed project would implement **Mitigation Measure BIO-1b**, detailed below, which require a pre-construction survey to reduce impact on nesting birds.

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

Mitigation Measure BIO-1a: Pre-Construction Surveys for Crotch's Bumblebee.

If construction will occur during the crotch's bumblebee flying season (March through August), a qualified biologist shall conduct preconstruction surveys for active bumblebee colony nesting sites in any previously undisturbed and/or natural/landscaped areas prior to the start of ground disturbing activities. At least three surveys must be conducted within 100 feet of any work areas in vegetated areas. The surveys shall occur when temperatures are above 60 degrees Fahrenheit (°F), on sunny days with wind speeds below 8 miles per hour, and at least 2 hours

¹² Bumble Bee Watch. Bumble Bee Sightings. <https://www.bumblebeewatch.org/maps>. Accessed on May 8, 2025.

after sunrise and 3 hours before sunset as these are the best conditions to detect bumblebees. Surveyors shall conduct transect surveys focusing on detection of foraging bumblebees and underground nests using visual aids such as binoculars.

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

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

To avoid impacts to nesting birds, a nesting bird survey should be conducted within 7 days of commencing construction work or tree removal if this work would commence between February 1st and August 31st. The nesting bird survey should include an examination of all buildings onsite and all trees onsite and within 200 feet of the entire project site (i.e., within a zone of influence of nesting birds), not just trees slated for removal. The zone of influence includes those areas outside the project site where birds could be disturbed by earth- moving vibrations and/or other construction-related noise. If birds are identified nesting on or within the zone of influence of the construction project, a qualified biologist should establish a temporary protective nest buffer around the nest(s). The nest buffer should be staked with orange construction fencing. The buffer must be of sufficient size to protect the nesting site from construction-related disturbance and should be established by a qualified ornithologist or 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 but that are not expected to occur on the project site. Upon completion of nesting bird surveys, if nesting birds are identified on or within a zone of influence of the project site, a qualified ornithologist/biologist that frequently works with nesting birds should prescribe adequate nesting buffers to protect the nesting birds from harm while the project is constructed. No construction or earth-moving activity should occur within any established nest protection buffer prior to September 1 unless it is determined by a qualified ornithologist/biologist that the young have fledged (that is, left the nest) and have attained sufficient flight skills to avoid project construction zones, or that the nesting cycle is otherwise completed. In the region of the project site, most species complete nesting by mid-July. This date can be significantly earlier or later, and would have to be determined by the qualified biologist. At the end of the nesting cycle, and fledging from the nest by its occupants, as determined by a qualified biologist, temporary nesting buffers may be removed, and construction may commence in established nesting buffers without further regard for the nest site.

- 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?*

There are no aquatic resources of any kind on the proposed project site. Site survey confirmed the absence of swales, scour, wetland hydrology indicators, or wetland-associated plant species. No swales with scour, or any other indicators of wetland hydrology were observed onsite during the March 31, 2025, site survey. Therefore, the proposed project would have **no impact** on state or federally protected wetlands.

- d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

The project site is an anthropogenic habitat surrounded by high-density urban residential development. The site contains no aquatic features, such as streams or rivers, that could function as wildlife movement corridors. In addition, the site is enclosed by highly restrictive fencing, which further limits wildlife movement. 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?*

The project site contains both native and ornamental trees. The biological resources analysis identifies several native species, including coast live oak (*Quercus agrifolia* var. *agrifolia*), valley oak (*Quercus lobata*), and coast redwood (*Sequoia sempervirens*) (**Appendix B**). The campus also features a variety of ornamental trees and shrubs such as cherry plum, ginkgo, and oleander, as well as weedy species in less-maintained areas. Most of the native trees are located along the northern boundary of the project site or adjacent to the baseball field near the northeast corner of the project site. Therefore, impacts to these trees are not expected with implementation of the proposed project. However, a few large coast redwood trees are located in planter areas adjacent to the existing D-Wing South and E-Wing South classroom buildings near the center of the project site. The proposed project would replace these buildings with a new classroom building. Construction activities in proximity to the trees could result in root injury, branch breakage, or tree removal.

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.

A few trees near the D-Wing South and E-Wing South buildings may qualify as heritage trees, and their removal or alteration would be considered a potentially significant impact. To reduce the project impact on the native trees within the campus, the project would implement **Mitigation Measure BIO-2, Tree Protection and Preservation Plan**. This measure requires

surveying trees near construction areas and preparing a Tree Protection and Preservation Plan outlining protective measures during construction. Any heritage trees removed would be replaced in accordance with the District's standards at a minimum one-to-one ratio. With implementation of **Mitigation Measure BIO-2**, impacts on native trees, including heritage trees, would be ***less than significant with mitigation incorporated***.

Mitigation Measure BIO-2. Tree Protection and Preservation Plan. Prior to the commencement of construction, the District shall retain a qualified biologist to conduct a comprehensive tree survey of the project site and prepare a Tree Protection and Preservation Plan. Native trees that meet the criteria for the District's heritage designation shall have appropriately sized Tree Protection Zones established to safeguard the trees and their critical root systems from construction-related impacts. In cases where native trees meeting protected or heritage tree criteria cannot be preserved, replacement shall be carried according at a one-to-one ration for protected trees and a minimum one-to-one ratio for heritage trees.

f) *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

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

6.5 Cultural Resources

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

The analysis in this section is based on the Cultural Resources Assessment Report prepared for the Menlo-Atherton High School.¹³

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 and intensified use of resources such as shellfish and acorns. Between 4,500 and 2,000 years ago, the spread of Utian peoples into the Bay Area and Central Coast replaced earlier Hokan groups, establishing the ancestral populations of the Miwok and Ohlone who occupied the region into the Historic Period.

Ethnography

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

¹³ Brunzell Historical, 2025. Technical Resources Assessment Report. Menlo-Atherton High School. June. Document available for review at the Sequoia Unified High School District at 1090 Mills Way, Redwood City, California 94063.

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

Historic Context

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

Spanish Period (1769–1821)

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

Mexican Period (1821–1848)

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

American Period (1848–Present)

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

San Mateo County

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

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

Atherton

The town of Atherton, originally part of Rancho de las Pulgas, was known as Fair Oaks in the 1860s and served as a summer retreat for wealthy landowners. It became a flag stop on the Southern Pacific Railroad and was officially incorporated as Atherton in 1923, named after landowner Faxon Dean Atherton. Large estates dominated the area until the 1920s–1930s, after which subdivisions and housing developments increased, doubling the population between 1950 and 1960. Schools were established in the 1950s, and by 2024, Atherton had a population of just over 7,000 residents.

Sequoia Union High School District

The 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. However, 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 the current Sequoia High School campus, a 35-acre estate, 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.

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).

Menlo-Atherton High School

The 38-acre Menlo-Atherton High School site, originally owned by the Donohoe family, was purchased by the SUHSD in 1949. Designed by Janssen and Daseking Architects in the finger-plan layout, the campus opened in 1951 with classroom wings, an administration building, music building, locker rooms, and a temporary multi-purpose facility. Expansion continued through the 1950s with additional classroom wings, Ayers Gym, and a pool, utilizing innovative pre-cast reinforced concrete bent construction. The architects emphasized daylight, ventilation, and functional circulation in their design, while landscape architect Arthur H. Cobblestick incorporated the property's mature oak trees into the site plan. Contractor Peter K. Sorensen, a prominent Redwood City builder, oversaw construction until his death in 1954. The school experienced racial tensions in the late 1960s as enrollment diversified, leading to the hiring of Black teachers to ease unrest. In 1986, Menlo-Atherton High School earned the California Distinguished School Award.

Beginning in the 1990s, Menlo-Atherton High School underwent significant modernization and expansion. New classroom wings (F Wing) were built between 1993 and 1998, followed by a new library in 1999 and a remodeled administration building in 2000. DES Architects of Redwood City designed these projects, along with the second gym completed in 2003. The original multi-purpose building and arcade were demolished in 2008, making way for a new Performing Arts Center designed by Hodgetts + Fung Design & Architecture in 2009. That same year, a new staff lounge was added at the west end of the administration wing. In 2017, LPA of Irvine designed and completed the two-story U-shaped G wing, and in 2019, the STEM Building, also by LPA, was constructed.

Campus Architecture

Menlo-Atherton High School has its main entrance along Middlefield Road and an internal road connecting parking areas at the south and west edges of campus. The layout is organized around long, one-story classroom wings arranged on an east-west grid on the west side of campus, with major shared facilities, including gyms, the pool, and athletic fields, to the east. Expansive open spaces between buildings, many landscaped with mature oaks, define the campus character and preserve elements of the site's natural setting.

The earliest classroom wings (1950–1951), designed in the Midcentury Modern “finger-plan” style, feature concrete masonry unit walls, low-pitched gable roofs, open-air corridors sheltered by canopies, and tall steel casement windows designed for daylighting and ventilation. Later

1950s buildings, such as D–E Wing and the shop building, introduced exposed concrete bents as structural and architectural elements. Together, these early facilities reflect cost-conscious but innovative postwar school design.

Over subsequent decades, the campus evolved with new facilities and architectural styles. The library (1999) and remodeled administration building (2000) introduced stucco-clad volumes with modest contemporary styling, while the Performing Arts Center (2009) added a striking postmodern landmark with a folded-plate roof and glazed entrance façade. The U-shaped G wing (2017) and STEM Building (2019) reflect 21st-century priorities, incorporating two-story forms, collaborative learning spaces, and colorful cladding.

Athletic facilities are concentrated at the northeast, anchored by Ayers Gym (1954), the new gym (2003), and surrounding sports fields. Portable classrooms and smaller support buildings fill in remaining needs for space. Throughout the campus, sheltered walkways connect classroom wings, while landscaped gathering areas reinforce the campus's open, park-like quality.

Archival Search

A records search conducted at the Northwest Information Center (NWIC) and through the Built Environment Resource Directory identified 122 prior cultural resource studies within one mile of the project site. Three of these studies assessed portions of the site. Forty-two cultural resources have been recorded within this one-mile radius, including one historic-period building, the Menlo-Atherton High School Music and Shop, located within the project site.

In addition to the record search, the project's historic architect conducted research using SUHSD construction and renovation drawings, the San Mateo County Historical Association, and online resources.

Site Surveys

An archaeological pedestrian survey of the project site was conducted on April 8, 2025, covering 100 percent of the area. Surface visibility was approximately 50 percent, and ground disturbances from construction, grading, and paving were extensive. No prehistoric or historic-period archaeological resources were identified, indicating a low potential for significant buried resources. The only previously recorded resource observed was the historic-period Menlo-Atherton High School Music and Shop.

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

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

Menlo-Atherton High School was evaluated for eligibility for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR) under all applicable criteria. The evaluation concluded that the campus does not meet the requirements for listing:

- Criterion A/1 (Event): The school is associated with mid-twentieth-century residential and educational growth in Menlo Park and Atherton. However, it is one of many postwar schools built during that period and does not have significance within this historical context.
- Criterion B/2 (Person): No individuals associated with the school have been shown to have made significant contributions to history.
- Criterion C/3 (Design/Architecture): The campus represents a typical Modernist postwar finger-plan school and was designed by local architects Janssen and Daseking. While competent, the design is not distinguished, many buildings have been altered or added over time, and the overall integrity of the campus has been substantially changed. It does not represent the work of a master nor possess high artistic value.
- Criterion D/4 (Information Potential): The buildings are examples of common construction methods and do not provide important information about historic construction materials or techniques.

Based on these findings, Menlo-Atherton High School is not eligible for listing on the NRHP or CRHR and is not considered a historical resource under CEQA. All project construction and staging would occur within the boundary of the project where no historical resources are present. Therefore, the project would have **no impact** on historical resources.

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

No archaeological resources, including prehistoric or historic-period materials, were identified during the records search or field survey of the project site. The site has experienced substantial prior disturbance, which reduces the likelihood of encountering intact archaeological deposits. Based on these findings, no further cultural resources investigations or monitoring are generally required.

However, ground-disturbing activities associated with the proposed project could potentially uncover previously unknown buried archaeological deposits. If construction or excavation exposes prehistoric or historic-period cultural materials, including artifacts, structural features, or human remains, this would be a potentially significant impact. Implementation of **Mitigation Measures CR-1a and CR-1b**, which would require providing an awareness training of all construction personnel and halting work in the event of unanticipated discovery of archaeological resources, would reduce this impact to a **less-than-significant** level.

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

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

Mitigation Measure CR-1b: Unanticipated Archaeological Resources

In the event that archaeological resources are encountered during ground-disturbing activities, work in the immediate area shall be halted and the contractor must notify the SUHSD, who shall 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 SUHSD, the archaeologist shall determine whether additional work, such as data recovery excavation, is warranted to mitigate any significant impacts to archaeological resources

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

No human remains were identified during the records search or field survey. However, the Sacred Lands File search with the Native American Heritage Commission (NAHC) returned positive results, indicating the potential presence of tribal cultural resources in the area.

Although the project site has been previously developed, it is still possible that buried human remains could exist and remain undiscovered. Ground-disturbing construction activities could inadvertently encounter such remains, which would constitute a significant impact. The project would be required to implement **Mitigation Measure CR-2: Avoid Impact to Human Remains**, which mandates halting construction or excavation in the vicinity of discovered human remains and notifying the County Coroner. **Mitigation Measure CR-2** also outlines procedures in compliance with applicable federal and state regulations in the event of an unexpected discovery. With implementation of **Mitigation Measure CR-2**, potential project impact on human remains would be reduced to a *less-than-significant with mitigation incorporated*.

Mitigation Measure CR-2: Avoid Impact to Human Remains

As described therein, if human remains are uncovered during future ground-disturbing activities, the SUHSD 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 SUHSD, an archaeologist, and the Most Likely Descendant designated by the Native American Heritage Commission will determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The Most Likely Descendant would have 48 hours to complete a site inspection and make recommendations after being granted access to the site. A range of possible treatments for the remains, including nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendants, or other culturally appropriate treatment may be discussed. The following is a list of site protection measures that shall be employed:

- Record the site with the NAHC and the appropriate Information Center
- Use an open-space or conservation zoning designation or easement

- Record a document with the county in which the property is located.

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

6.6 Energy

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

6.6.1 Environmental Setting

According to the California Energy Commission, statewide energy consumption in 2023 totaled approximately 276,213 gigawatt hours (GWh) of electricity¹⁴ and 11,655 million therms of natural gas.¹⁵ 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.¹⁶ 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.

¹⁴ 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.

¹⁵ California Energy Commission. 2025. Natural Gas Consumption. <https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/california-energy-consumption-dashboards-1>. Accessed August 28, 2025.

¹⁶ 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.

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. As required, all public school projects undergo plan review by the 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6.7.1 Existing Setting

The following information is based in part on two geotechnical reports prepared for the proposed new classroom building, the new bleachers, and the press box construction at the project site.¹⁷

¹⁷ Cornerstone Earth Group. 2024. Geotechnical Investigation and Geologic Hazards Evaluation. Menlo Atherton High School. Bleacher Replacement. November 14.
 Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. New Classroom Building Project. Menlo-Atherton High School. 555 Middlefield Road, Atherton, California. May.
 Documents available for review at the Sequoia Unified High School District at 1090 Mills Way, Redwood City, California 94063.

Geological Setting

Regional Geological Setting

The San Francisco Peninsula separating Pacific Ocean from the San Francisco Bay is dominated by the young Santa Cruz Mountains. Part of the much larger Coast Ranges geomorphic province of California, the raised mountain range consists of an assortment of deeply incised Cretaceous and Jurassic (70- to 200-million years old) bedrock of the Franciscan Complex.¹⁸

Local Geology

The Menlo-Atherton High School project site is located on a broad alluvial fan that lies between the range front and the San Francisco Bay. Geologic mapping of the site vicinity indicates that the site is underlain by Pleistocene-age older alluvium (map unit Qoa) comprised of weathered, unconsolidated to moderately consolidated gravel, sand, and silt.

Seismicity

The San Francisco Bay Area is recognized by geologists and seismologists as one of the most active seismic regions in the United States. The three major fault zones which pass through the Bay Area in a northwest direction have produced approximately a dozen earthquakes per century strong enough to cause structural damage. The faults causing these earthquakes are part of the San Andreas fault system, a major rift in the earth's crust that extends for at least 450 miles along the California Coast and which in this region includes the San Andreas, San Gregorio, Hayward and Calaveras faults.

The project site is located approximately 5.7 miles northeast of the San Andreas fault, 13.4 miles southwest of the Hayward fault, 15.4 miles northeast of the San Gregorio fault, and 18.5 miles southwest of the Calaveras fault.

Modeling of earthquake occurrence probabilities over the 30-year period from 2014 to 2043 has been conducted on both a statewide and regional basis. The findings indicate a 72 percent probability that one or more earthquakes of magnitude 6.7 or greater will occur in the San Francisco Bay region during this timeframe. The probability of one or more regional earthquakes of magnitude 6.0 or greater over the same period is estimated at 98 percent, while the occurrence of at least one regional earthquake of magnitude 5.0 or greater is considered nearly certain.¹⁹

Soils

Soil borings conducted west of the stadium indicate that subsurface conditions in the project area consist primarily of clay and sand deposits. Near the surface, soils are generally stiff clay

¹⁸ Cornerstone Earth Group. 2024. Geotechnical Investigation and Geologic Hazards Evaluation. Menlo Atherton High School. Bleacher Replacement. November 14.

¹⁹ Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. New Classroom Building Project. Menlo-Atherton High School. 555 Middlefield Road, Atherton, California. May.

with varying amounts of sand, underlain at greater depths by layers of sand, clayey sand, and sandy clay. Denser sand with silt and gravel occurs below approximately 23 feet.²⁰

Soil borings conducted near the proposed new classroom indicate that the project site is generally underlain by layers of sandy clay and silty clay, interspersed with silt, sand, and gravel mixtures. These soil conditions were observed to a depth of approximately 50 feet.²¹

Soils near the stadium and the new classroom were found to have moderate expansion potential.

- a) *Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
 - i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)*

The project site is not within an Alquist-Priolo Earthquake Fault Zone, and no active or potentially active faults are known to traverse the site. The site is approximately 0.6 miles west of the Quaternary San Jose Fault and 1.0 mile east of the Quaternary Stanford Fault. Neither of these faults is zoned by the California Geological Survey, and neither extends beneath the campus. Consequently, the likelihood of surface rupture at the project site is low. Given the distances to these faults and the absence of known active faults on or near the site, the 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 estimated 30-year probability for a magnitude 6.7 or greater earthquake to occur in the San Francisco region at approximately 72 percent considering the known active seismic sources. The new construction at the project site, including the bleachers, press box, and classroom building, would be designed and constructed in accordance with the recommendations provided in the project-specific geotechnical reports. These recommendations typically address structural foundations, site preparation, soil improvement measures (if required), and design parameters to reduce risks associated with seismic ground shaking. Implementation of these measures would ensure that the project incorporates appropriate engineering practices to withstand anticipated seismic forces.

In addition, the 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.

²⁰ Cornerstone Earth Group. 2024. Geotechnical Investigation and Geologic Hazards Evaluation. Menlo Atherton High School. Bleacher Replacement. November 14.

²¹ Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. New Classroom Building Project. Menlo-Atherton High School. 555 Middlefield Road, Atherton, California. May.

Through compliance with these requirements and adherence to geotechnical measures specific to each construction project or structural upgrade to buildings on campus, 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.²²

Subsurface conditions at the proposed new classroom building site consist of interlayered firm to very stiff sandy clay and silty clay, underlain by medium dense mixtures of silt, gravel, sand, and clay to a maximum explored depth of 50 feet. Soil borings indicate that the sandy clay and silty clay layers are not susceptible to liquefaction. The geotechnical analysis estimates that seismically induced liquefaction settlement at the site could be approximately 1.5 inches, with up to 0.75 inch of differential settlement over a horizontal distance of 50 feet. The potential for seismically induced dry soil settlement is considered negligible.

Based on these findings, the likelihood of significant structural damage to the proposed new classroom building from liquefaction-related settlement is low. While minor liquefaction-induced surface manifestations, such as limited settlement or surface cracking, could occur, the presence of a thick (approximately 20 feet) non-liquefiable soil layer overlying the potentially liquefiable deposits would provide stable support for the structure. Loss of foundation support is therefore not anticipated.

Liquefaction analysis of subsurface soils in the vicinity of the stadium indicates a potential for localized sand layers to liquefy during a significant seismic event. While the potential for liquefied sands to vent to the ground surface through overlying soils is considered low, the analysis estimates that liquefaction-induced settlement of approximately 0.5 inch or less could occur, with associated differential settlement of less than 0.5 inch. In addition, seismically induced dry sand shaking settlements on the order of 0.5 to 1 inch may occur, with differential settlements of up to 0.5 inch. The total differential settlement is therefore estimated to be approximately 0.75 inch over a horizontal distance of 30 feet.

The proposed project would implement the recommendations outlined in the geotechnical analysis specific to each construction project or structural upgrade to buildings on campus. These measures include designing foundations to accommodate the anticipated total and differential settlements and incorporating structural and geotechnical design parameters

²² Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. New Classroom Building Project. Menlo-Atherton High School. 555 Middlefield Road, Atherton, California. May.

appropriate to the site's subsurface conditions. Implementation of these recommendations would be ensured through compliance with the California Building Standards Code (Title 24, California Code of Regulations).

With adherence to the geotechnical recommendations and applicable regulatory requirements, the potential for liquefaction-related impacts would be reduced, and the proposed project would not expose people or structures to significant hazards associated with liquefaction. Therefore, this impact would be considered ***less than significant***.

iv. Landslides?

The project site is generally flat by nature. Published geologic maps show no landslides mapped at or immediately upslope of the site. The site is not within a designated zone of seismic landslide potential.²³ Therefore, project implementation would have ***no impact*** related to landslide hazards.

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

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

The project would involve earthmoving activities during the construction of the new buildings, installation of utilities, and improvements to the sports field turfs. 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, thereby increasing turbidity, degrading water quality, and resulting 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 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

²³ Cornerstone Earth Group. 2024. Geotechnical Investigation and Geologic Hazards Evaluation. Menlo Atherton High School. Bleacher Replacement. November 14.

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 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 discussed above, the project would result in no impact from landslides; and would result in a less than significant impact related to liquefaction. The project site is located approximately 4,000 feet northwest of the San Francisquito Creek Channel. However, because of the site's gentle topography, the likelihood that the site would be affected by lateral spreading is considered unlikely. As noted above, the proposed project would implement the recommendations outlined in the geotechnical analysis specific to each construction project or structural upgrade to buildings on campus. These measures include designing foundations to accommodate the anticipated total and differential settlements and incorporating structural and geotechnical design parameters appropriate to the site's subsurface conditions. Implementation of these recommendations would be ensured through compliance with the California Building Standards Code (Title 24, California Code of Regulations). 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.

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

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

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

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

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

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

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

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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.”²⁴

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.²⁵

- 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.

24 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.

25 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 extension of utilities and 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 **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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.9.1 Environmental Setting

The site was developed as a school in the early 1950s. A review of the California Department of Toxic Substances Control’s (DTSC) EnviroStor database indicates that chlordane, a pesticide, was detected in soils at the project site during the 2016 construction activities near the G-Wing. DTSC requested further soil testing and on March 10, 2017, the District submitted a soil evaluation and a health risk analysis addressing possible prior agricultural use at the campus, potential presence of naturally occurring asbestos in soil, and the presence of undocumented fill. The soil investigation determined that potential contaminants of concern are either absent or below health-based screening levels and concluded that the project site does not pose a significant risk to human health or the environment. The DTSC determined that no further remedial action is required.²⁶

²⁶ DTSC. 2025. https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60002423. Accessed: September 2, 2025.

The project site is identified on the State Water Resources Control Board's GeoTracker database as non-case information.²⁷ The information item for the site is a soil investigation, which provided the results of soil samples collected in August 2007 prior to the construction of the Performing Art Center. The soil analysis reported low concentrations of petroleum hydrocarbons below the Environmental Screening Levels (ESLs). No pesticides were detected, and metals were found at levels below typical background concentrations and/or their respective residential California Human Health Screening Levels (CHHSLs).²⁸ The GeoTracker database indicates that the review of the information item (soil investigation) was determined complete in August 22, 2007.

Older documentation on the GeoTracker database indicates that four underground storage tanks (1,000 to 1,750 gallons each) were removed from the project site in 1990. Soil sampling and monitoring showed only minimal contamination, and no significant release was identified. On December 30, 1993, the San Mateo County Department of Health Services determined that no further investigation or remediation was required. The case was officially closed on January 3, 1994.²⁹

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

The proposed project would involve construction of new buildings, renovation of existing buildings, and associated infrastructure and landscaping improvements. Construction activities of new buildings would involve site preparation that would include demolition, grading, and staging of construction equipment and trailers, among other site preparation activities in the zoned areas planned for construction. Additionally, construction of new buildings would include the installation of new utilities, including water, sewer, and electrical services. In addition, 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, including renovations to existing buildings, would require the use and transport of limited quantities of hazardous materials such as fuels and oils, solvents and cleaning solutions, paint and thinners, and other common construction materials. These materials could be released during transport, use, or disposal and could cause a hazard for the public. However, the District would require the contractor to implement best management practices, including hazardous materials management measures, which would reduce short-term construction impacts pertaining to the transport, use, and disposal of hazardous materials.

The contractor would be required to comply with Occupational Health and Safety Administration (OSHA) and California Division of Occupational Health and Safety (Cal/OSHA) health and

²⁷ Non-Case information Sites contain environmental data, location data, or potential source information that may be considered important to a given area.

²⁸ State Water Resources Control Board. Geotracker database. https://geotracker.waterboards.ca.gov/profile_report?global_id=T10000008380. Accessed: September 2, 2025.

²⁹ State Water Resources Control Board. Geotracker database. https://geotracker.waterboards.ca.gov/profile_report?global_id=T0608100325. Accessed: September 2, 2025.

safety requirements, all of which would be specified in the construction contracts. These regulations are effective in reducing potential risks to workers by requiring the contractor to adhere to safety standards and provide safety training to workers. In addition, hazardous materials must be transported to and from the project site in accordance with the Resource Conservation and Recovery Act and U.S. Department of Transportation regulations and disposed of in accordance with the Resource Conservation and Recovery Act at a licensed facility that is permitted to accept the waste. These regulations provide a framework for controlling hazardous waste from cradle to grave, ensuring the safe transport, use, and disposal of hazardous materials during construction. These regulations govern record-keeping of all aspects of the hazardous materials lifecycle, mitigating and cleaning up existing contamination and hazardous materials spills, describing requirements for emergency response, and ensuring that workers are trained to handle hazardous materials and respond appropriately to hazardous materials incidents. Because compliance with existing regulations is mandatory, construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. In addition, the proposed project would be required to comply with the District SCM-5 for hazardous materials, which requires the implementation of best management practices for preventing releases of hazardous materials used during construction, including proper storage, spill prevention, and immediate containment and cleanup. Any reportable spills or releases would be promptly reported to the appropriate regulatory agencies. As noted below in **Section 6.10 - Hydrology and Water Quality**, as part of the California State Water Resources Control Board General Construction Permit, the proposed project would be required to prepare and submit a construction site-specific SWPPP. The SWPPP would include a description of appropriate BMPs to minimize the discharge of pollutants from the project site.

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

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

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

The proposed project would include demolition of the existing E-Wing and D-Wing classroom buildings and bleachers. Based on the classroom buildings' date of construction (1951-1955), some of the building materials may pre-date the 1970s ban on the use of asbestos-containing materials (ACMs) and lead-based paint (LBP).

The DTSC considers asbestos hazardous and requires removal of ACMs prior to demolition or construction activities that could result in disturbance of these materials. For ACMs removal, the District would comply with local and state regulations as well as with the 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. 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 Air District is to be notified 10 days in advance of any proposed demolition or abatement work. The local office of Cal/OSHA must also be notified of asbestos abatement. Asbestos abatement contractors must follow state regulations contained in the CCR Title 8, Section 1529 and Sections 341.6 through 341.14, when their work involves 100 gross square feet or more of asbestos-containing materials. Pursuant to California law, the District would comply with the all the requirements described above.

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

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

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

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

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

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

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

Hazards and Hazardous Materials

- d) *Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

The project site is not listed as an active or open hazardous materials case on any state regulatory database. As noted above, a review of the DTSC EnviroStor database indicates that chlordane, a pesticide, was detected in soils at the project site during the 2016 construction activities near the G-Wing. DTSC requested further investigation, and on March 10, 2017, the District submitted a soil evaluation and human health risk analysis addressing potential contaminants, including prior agricultural use, naturally occurring asbestos, and undocumented fill. The investigation concluded that contaminants of concern were either absent or detected at concentrations below health-based screening levels. DTSC subsequently determined that the site does not pose a significant risk to human health or the environment and that no further remedial action is required.

The State Water Resources Control Board's GeoTracker database also identifies the project site under non-case information for a soil investigation conducted in August 2007, prior to construction of the Performing Arts Center. Soil samples reported low concentrations of petroleum hydrocarbons below ESLs, no detection of pesticides, and metals below typical background concentrations or residential CHHSLs. The information item was determined complete in August 2007.

In addition, the GeoTracker database notes that four underground storage tanks (USTs), ranging from 1,000 to 1,750 gallons, were removed from the site in 1990. Soil sampling and monitoring showed only minimal contamination and no significant release. On December 30, 1993, the San Mateo County Department of Health Services determined that no further investigation or remediation was required, and the case was closed on January 3, 1994.

Therefore, the project site is not listed on an active hazardous materials and this impact would be ***less than significant***.

- e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The project site is not located within an airport land use plan and is not within two miles of a public or public-use airport. The nearest airports to the project site are Palo Alto Airport, located approximately 3 miles east; San Carlos Airport, approximately 5 miles northwest; Moffett Federal Airfield, approximately 7 miles southeast; San Francisco International Airport, approximately 15 miles northwest; and Norman Y. Mineta San Jose International Airport, approximately 14 miles southeast. 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 proposed project would be fully contained within the project site, with no lane closures required on adjacent roadways. Access for emergency vehicles

would be maintained at all times throughout the construction period. On a long-term basis, the proposed 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?*

Atherton does not have any officially designated fire hazard zones, and the California Department of Forestry and Fire Protection (CAL FIRE) has no records of historical wildfires within the town. However, CAL FIRE classifies the land south of Alameda de Las Pulgas as a Wildland-Urban Interface (WUI) zone, which is an area where development is adjacent to or intermingled with vegetation that is susceptible to wildfire.³⁰ The WUI is approximately 2.5 miles southwest of the school. The project does not propose new structures within areas designated as high, very high, or extreme wildfire threat zones. The site is situated in an urbanized area with developed infrastructure, reducing the likelihood of direct exposure to wildfires. Project impact related to wildfire is discussed further in **Section 6.20 – Wildfire**. The proposed development would not significantly expose people or structures to the risk of loss due to wildland fires. The impact is considered **less than significant**.

³⁰ PlaceWorks. 2025. Peninsula Resilience Planning Project. Town of Atherton Vulnerability Assessment Summary. Prepared for the Town of Atherton. March.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.10.1 Environmental Setting

The Menlo-Atherton High School is at an approximate elevation of 50 feet above mean sea level and is generally flat.³¹ The Atherton Creek watershed covers approximately 8.9 square miles and has been extensively modified. It spans multiple jurisdictions, including Atherton, Redwood City, Menlo Park, Woodside, and unincorporated San Mateo County. From its headwaters west of Interstate 280, the creek flows in its natural alignment to Alameda de las Pulgas. Downstream of this point, however, the channel has been heavily altered, transitioning into a concrete-lined channel through El Camino Real, and then a mix of concrete channel and culvert as it continues toward San Francisco Bay. While several small tributaries join Atherton Creek upstream of

³¹ Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. New Classroom Building Project. Menlo-Atherton High School. 555 Middlefield Road, Atherton, California. May.

Alameda de las Pulgas, the downstream drainage system primarily consists of underground culverts and storm drains.³²

The nearest creek to the project site is San Francisquito Creek, located approximately 0.8 miles southeast of the project site. Atherton Creek is located approximately 0.9 miles northwest of the project site.³³

Groundwater

The historic high groundwater table in the site vicinity is reported to be 20 to 30 feet below the ground surface. Groundwater was encountered during geotechnical soil investigations near the proposed new classroom building at 26.5 feet below ground surface.³⁴ It was noted in the geotechnical analysis that fluctuations of localized perched groundwater and the regional groundwater level can occur due to such factors as variations in rainfall, temperature, runoff, pumping, and groundwater recharge.

There are nine groundwater basins with boundaries—either partial or whole—within San Mateo County. The San Mateo Plain Subbasin underlies the bayside of San Mateo County from approximately the City of San Mateo on the north, to approximately the County boundary at San Francisquito Creek on the south.³⁵

Stormwater

Stormwater runoff generated within the project area is collected by the local municipal storm drain system, which consists of curb inlets and underground pipelines. These pipelines convey runoff into the Atherton Channel, which together with the Bayfront Canal, serves as a primary stormwater conveyance system for Atherton, Menlo Park, Redwood City, Woodside, and surrounding unincorporated areas.³⁶

The Atherton Channel and Bayfront Canal Improvement Project, now managed by the San Mateo County Flood and Sea Level Rise Resiliency District (OneShoreline), has implemented upgrades to improve capacity and reduce flood risks. The OneShoreline directs excess flows through twin underground culverts into managed ponds at the Ravenswood Complex of the South Bay Salt Pond Restoration Project, where water is temporarily stored and treated through natural processes.³⁷ This regional system is designed to convey stormwater away, reduce

³² San Mateo Countywide Water Pollution Prevention Program. 2008. Unified Stream Assessment in Seven Watersheds in San Mateo County, California. August.

³³ California Museum. Guide to San Francisco Bay Creeks. Atherton Channel Watershed. <https://explore.museumca.org/creeks/1470-RescAtherton.html>. Accessed September 2, 2025.

³⁴ Cleary Consultants, Inc. 2025. Geotechnical and Geologic Hazards Investigation. New Classroom Building Project. Menlo-Atherton High School. 555 Middlefield Road, Atherton, California. May.

³⁵ San Mateo County Sustainability Department. Groundwater. <https://www.smcsustainability.org/water-protection/groundwater/#san-mateo-plain-subbasin>. Accessed September 2, 2025.

³⁶ San Mateo County Flood & Seal Level Resiliency District. 2025. <https://oneshoreline.org/projects/bayfront-atherton-flood-protection/> Accessed: September 5, 2025.

³⁷ San Mateo County Flood & Seal Level Resiliency District. 2025. <https://oneshoreline.org/projects/bayfront-atherton-flood-protection/> Accessed: September 5, 2025.

localized flooding, improve downstream water quality, and provide ecological benefits to adjacent wetland habitats.³⁸

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 be outside the 0.2 percent annual chance floodplain.³⁹

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

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

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

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

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

³⁸ San Mateo County Flood & Seal Level Resiliency District. 2025. <https://onshoreline.org/projects/bayfront-atherton-flood-protection/> Accessed: September 5, 2025.

³⁹ FEMA. 2023. National Flood Hazard Layer FIRMette. Town of Atherton. 060312. https://msc.fema.gov/arcgis/rest/directories/arcgisjobs/nfhl_print/mscprintb_gpserver/ja8724b54add34dd48bfa307370016d78/scratch/FIRMETTE_d8142178-a325-4c21-a70e-40d02bfab5cc.pdf. Accessed September 8, 2025.

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

Through adherence to these requirements and ongoing maintenance of stormwater treatment facilities, operation of the project would not result in violations of water quality standards or waste discharge requirements, nor would it substantially degrade surface or groundwater quality.

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

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

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

- c) *Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*
 - i. *Result in substantial on- or off-site erosion or siltation;*

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

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

Therefore, the proposed project impact related to erosion or siltation during construction and operation would be ***less than significant***.

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

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

As stated above, on-site treatment controls would be implemented to reduce stormwater flows and thus reduce the potential for any off-site flooding. In addition, the project design would include features that minimize surface water runoff (e.g., permeable pavers, drought tolerant landscaping, and efficient water irrigation). These features would help to mimic natural hydrologic conditions which can help reduce sheet flow and the velocity of stormwater and prevent soil erosion. 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 much of the new development would occur in areas already developed with buildings or paved surfaces.

Replacement of natural grass with synthetic turf at the baseball and softball fields would slightly increase the effective imperviousness of these areas compared to natural turf because of reduced infiltration capacity. However, synthetic turf systems are designed with engineered subsurface drainage that conveys stormwater to the existing campus drainage system. These drainage features would ensure that runoff volumes and rates from the turf fields would not exceed existing conditions.

In addition, stormwater from the turf fields would pass through integrated drainage layers that provide limited filtration of sediment and debris prior to discharge. With these design features and compliance with applicable post-construction stormwater management requirements, replacement of natural turf with synthetic turf would not result in substantial changes to on-site or off-site drainage patterns, nor would it increase the potential for erosion, siltation, or other water quality impacts. Therefore, project impact related to increased runoff from grading, construction, and turf replacement would be ***less than significant***.

- iv. *Impede or redirect flood flows?*

As noted above, the project site is not located within a designated flood hazard zone, as identified by the FEMA Flood Insurance Rate Maps. In addition, proposed buildings and site

improvements would not involve features that would impede or redirect existing flood flows. Therefore, **no impact** would occur under this criterion.

d) *Result 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 3 miles west of the San Francisco Bay shoreline tsunami zone and is also at approximately 50 feet above mean sea level. Therefore, the project is not at risk to release pollutants in the event of a seiche or tsunami since there is no nearby waterbody. The proposed project would have **no impact** related to flood hazard, tsunami, or seiche zones.

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

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

6.11 Land Use and Planning

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.11.1 Environmental Setting

The project site is located in the Town of Atherton in San Mateo County. The site is an existing high school campus originally constructed in the mid-20th century and has been subject to various additions and renovations over time. Surrounding land uses consist primarily of single-family residential neighborhoods to the north, east, and west, with portions of the campus bordering the City of Menlo Park to the south. The Menlo-Atherton High School property is designated as Public Facilities and Schools under the Town of Atherton's General Plan.

a) *Physically divide an established community?*

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

j. *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 Town of Atherton General Plan land use designation. Accordingly, the project would maintain consistency with existing land use and zoning designations.

Project consistency with applicable plans and policies adopted to avoid or mitigate environmental effects is addressed throughout this Initial Study. The analysis incorporates best management practices and mitigation measures that would reduce potentially significant impacts to less-than-significant levels. Therefore, the 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.12.1 Environmental Setting

Under the Surface Mining and Reclamation Act (SMARA), the State Mining and Geology Board (Board) may designate certain mineral deposits as being regionally significant to satisfy future needs. The Board’s decision to designate an area is based on a classification report prepared by the California Geological Survey and on input from agencies and the public. The State Office of Mine Reclamation’s list of mines regulated under the SMARA does not include any mines within the City.⁴⁰ The Town of Atherton does not designate any lands as having mineral use or mineral resources within or adjacent to the Town.⁴¹

a) and b) *Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or a locally important mineral resource recovery site delineated on a local general plan ?*

As noted above, there are no mines within the City of Atherton or its surrounding area listed on the SMARA-regulated mines. In addition, the Town of Atherton General Plan does not designate any lands within or adjacent to the town for mineral resource use. 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 proposed 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.

⁴⁰ California Department of Conservation. Division of Mine Reclamation. 2025. Mines Online: <https://maps.conservation.ca.gov/mol/index.html>. Accessed: September 9, 2025.

⁴¹ Town of Atherton. 2020. Town of Atherton General Plan 2019. January.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.13.1 Noise and Vibration Fundamentals

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

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

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

TABLE 7 - 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.

Source: Handbook of Acoustical Measurements and Noise Control, Harris, 1998.

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 8 - 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 9 – Reaction of People and Damage to Buildings from Continuous or Frequent Intermittent Vibration Levels**, displays the reactions of people and the effects on buildings that continuous vibration levels produce.

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

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

TABLE 9 - REACTION OF PEOPLE AND DAMAGE TO BUILDINGS FROM CONTINUOUS OR FREQUENT INTERMITTENT VIBRATION LEVELS

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

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

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

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

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

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

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

As discussed in **Section 3.2.5, FMP Project Construction**, the proposed project would be required to comply with the District's Standard Construction Measures for controlling construction noise (SCM-7), which requires complying with the local noise ordinance. In compliance with the Town of Atherton noise ordinance, the proposed project would limit outdoor construction activities to the hours of 8:00 a.m. to 5:00 p.m. on weekdays. Indoor or renovation work may occur outside these hours, including on weekends. No outdoor construction would occur on Saturdays, Sundays, or holidays. In addition, also in compliance with SCM-7, the proposed project construction would implement the following best management practices.

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

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

The Town of Atherton noise ordinance does not establish specific noise limits for construction occurring during allowed hours. To assess the noise levels resulting from the construction of the proposed project, the Federal Transit Administration's (FTA) noise thresholds are used in this analysis. The FTA limits daytime construction noise to 80 A-weighted decibels⁴² (dBA) Equivalent continuous sound level⁴³ (Leq) at residential areas, 85 dBA Leq at commercial and office areas, and 90 dBA Leq at industrial areas.

Typical hourly average noise levels from school construction projects are around 75 to 89 dBA Leq, measured at 50 feet from the site during peak construction times (e.g., earth-moving equipment, impact tools, etc.). 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's) Roadway Construction Noise Model (RCNM) was used to calculate the maximum instantaneous and hourly average noise levels generated by construction activities during each major construction 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").

Based on equipment usage factors at full power, **Tables 10 through 17** detail the anticipated construction noise levels for the four project areas. For the classroom building, the bleachers, press box, weight room, and sports field turfs, the paired tables provide noise data at a 50-foot radius and at specific receptor locations, respectively.

As shown in **Tables 11, 13, 15, and 17**, construction noise levels produced by the major improvements at Menlo-Atherton High School would remain at or below 75 dBA Leq at receptors near the various improvement sites. The predicted noise levels are a minimum of 5 dBA under the 80 dBA limit set by the FTA for residential receptors.

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

⁴² A noise measurement adjusted to reflect how the human ear perceives sound.

⁴³ The average sound level over a specified period.

TABLE 10 - CONSTRUCTION NOISE LEVELS AT 50 FEET (NEW CLASSROOM BUILDING)

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

Source: Illingworth & Rodkins, 2025.

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

^b Denotes the loudest piece of construction equipment per phase.

TABLE 11 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (NEW CLASSROOM BUILDING)

Phase	Hourly Average Noise Levels ^a , dBA L _{eq}				
	Source (50 ft)	Northwest Residential (290 ft ^b)	Northeast Residential (1,070 ft ^b)	East Residential (700 ft ^b)	Southwest Residential (530 ft ^b)
Demolition	86	71	59	63	65
Site Preparation	84	69	57	61	63
Grading / Excavation	85	70	58	62	64
Trenching / Foundation	82	67	55	59	61
Building – Exterior	82	67	55	59	61
Building – Interior/ Architectural Coating	74	59	47	51	53
Paving	85	70	58	62	64

Source: Illingworth & Rodkins, 2025.

NOTES: ^a These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.

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

TABLE 12 - CONSTRUCTION NOISE LEVELS AT 50 FEET (NEW WEIGHT ROOM & TRAINING ROOM IMPROVEMENTS)

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

Source: Illingworth & Rodkins, 2025.

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

^b Denotes the loudest piece of construction equipment per phase.

TABLE 13 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (NEW WEIGHT ROOM & TRAINING ROOM IMPROVEMENTS)

Phase	Hourly Average Noise Levels ^a , dBA L _{eq}				
	Source (50 ft)	Northwest Residential (505 ft ^b)	Northeast Residential (480 ft ^b)	East Residential (440 ft ^b)	Southwest Residential (1,130 ft ^b)
Demolition	86	66	66	67	59
Site Preparation	84	64	64	65	57
Grading / Excavation	85	65	65	66	58
Trenching / Foundation	82	62	62	63	55
Building – Exterior	82	62	62	63	55
Building – Interior/ Architectural Coating	74	54	54	55	47

Source: Illingworth & Rodkins, 2025.

NOTES: ^a These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.

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

TABLE 14 - CONSTRUCTION NOISE LEVELS AT 50 FEET (TURF AT BASEBALL AND SOFTBALL FIELD)

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

Source: Illingworth & Rodkins, 2025.

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

^b Denotes the loudest piece of construction equipment per phase.

TABLE 15 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (TURF AT BASEBALL AND SOFTBALL FIELD)

Phase	Hourly Average Noise Levels ^a , dBA L _{eq}				
	Source (50 ft)	Northwest Residential (680 ft ^b)	Northeast Residential (230 ft ^b)	East Residential (280 ft ^b)	Southwest Residential (1,370 ft ^b)
Site Preparation	85	62	72	70	56
Grading / Excavation	85	62	72	70	56
Trenching / Foundation	82	59	69	67	53

Source: Illingworth & Rodkins, 2025.

NOTES: ^a These noise levels represent the combined noise levels of all equipment operating simultaneously per phase.

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

TABLE 16 - CONSTRUCTION NOISE LEVELS AT 50 FEET (BLEACHERS AND PRESS BOX)

Phase	Construction Equipment (Quantity)	Maximum Instantaneous Noise Level (L _{max})	Average Noise Level (L _{eq})
Demolition	Concrete/Industrial Saw (1) ^a	90	85
	Rubber-Tired Dozer (1)	82	
	Tractor/Loader/Backhoe (2) ^a	84/79	
Site Preparation	Grader (1) ^a	85	84
	Tractor/Loader/Backhoe (1) ^a	84	
Grading / Excavation	Grader (1) ^a	85	84
	Rubber-Tired Dozer (1)	82	
	Tractor/Loader/Backhoe (1) ^a	84	
Trenching / Foundation	Tractor/Loader/Backhoe (1) ^a	84	82
	Excavator (1) ^a	81	
Building - Exterior	Crane (1)	81	81
	Forklift (2)	75	
	Tractor/Loader/Backhoe (2) ^{a, a}	84/79	

Source: Illingworth & Rodkins, 2025.

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

^b Denotes the loudest piece of construction equipment per phase.

TABLE 17 - CONSTRUCTION NOISE LEVELS AT RECEPTORS (BLEACHERS AND PRESS BOX)

Phase	Hourly Average Noise Levels ^a , dBA L _{eq}				
	Source (50 ft)	West Residential (170 ft ^b)	North Residential (400 ft ^b)	East Residential (830 ft ^b)	Southwest Residential (1,240 ft ^b)
Demolition	86	75	68	62	58
Site Preparation	84	73	66	60	56
Grading / Excavation	85	74	67	61	57
Trenching / Foundation	82	71	64	58	54
Building – Exterior	82	71	64	58	54

Source: Illingworth & Rodkins, 2025.

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

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

The FTA recommends vibration limits of 0.5 inch per second (in/sec) peak particle velocity (PPV) 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 follows⁴⁴:

Table 18 - 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 40 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 15, 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**.

⁴⁴ Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, September 2018.

TABLE 18 - 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
	in rock	0.017	4
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.

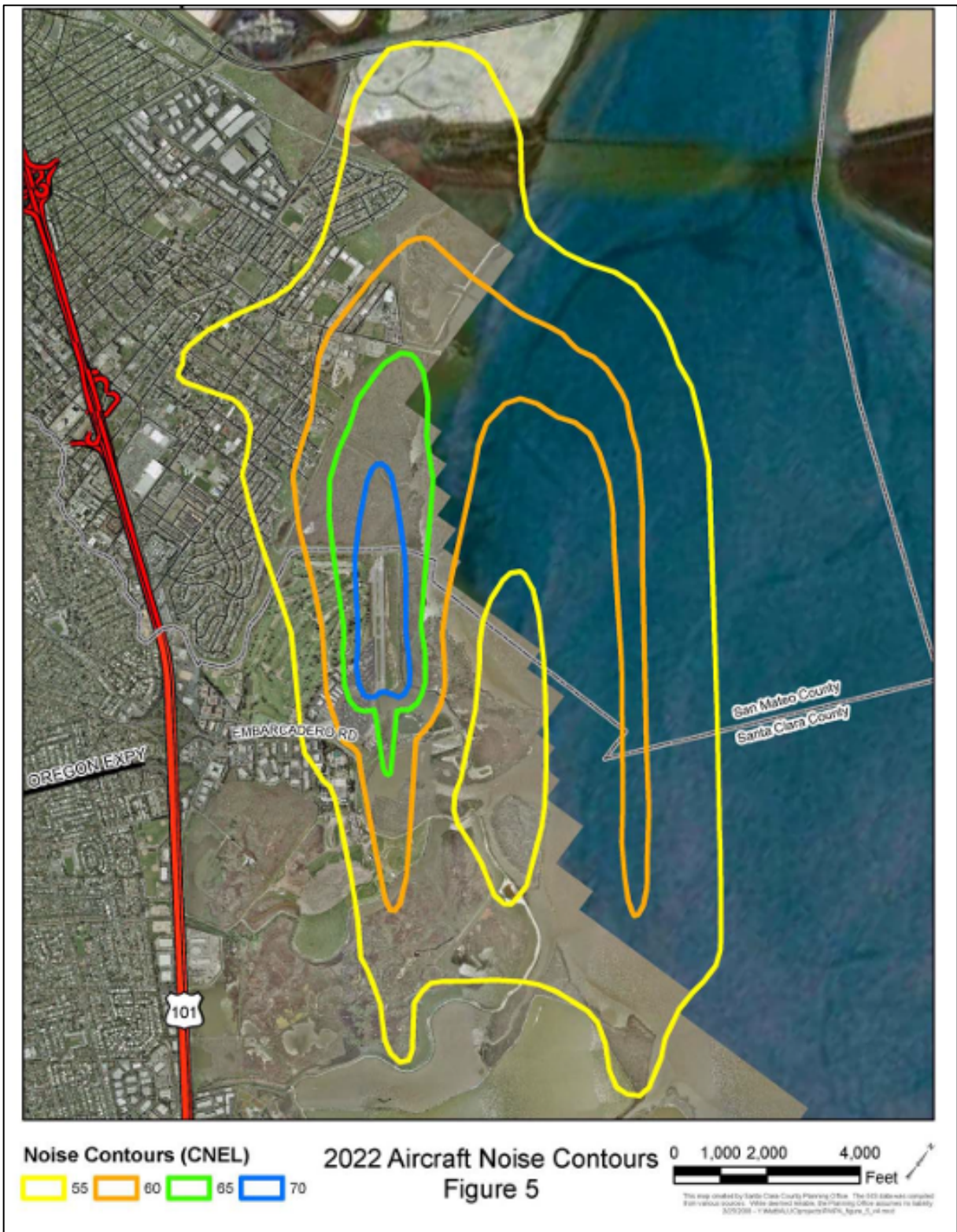
- c) *For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?*

The Palo Alto Airport is a general aviation field located northeast of US 101 and southwest of San Francisco Bay, approximately 3 miles east of Menlo-Atherton High School. **Figure 6- 2022 Forecasted Palo Alto Airport Noise Contour Map**, shows the noise contours at Palo Alto Airport as of 2022. Menlo-Atherton High School is not within two miles of the airport and is well outside the 55 dBA CNEL noise contour.

San Carlos Airport is a community airport situated northeast of US 101 and southwest of San Francisco Bay, approximately 5 miles northwest of Menlo-Atherton High School. **Figure 7- 2035 Noise Contours of the San Carlos Airport**, depicts the projected 2035 noise contour for the San Carlos Airport area.⁴⁵ Menlo-Atherton High School is located more than 5 miles from this airport and lies well outside the 60 dBA CNEL noise contour. According to an analysis of Exhibit E-2 of the ALUCP, aircraft operations are unlikely to produce noise levels exceeding 65 dBA CNEL at the site.

The project site is located outside of the 55 and 60 dB CNEL noise contours for both the Palo Alto Airport and San Carlos Airport. All other airports are located further away from the project site. The proposed project would have **no impact** related to people exposure to excessive noise levels in the vicinity of airports.

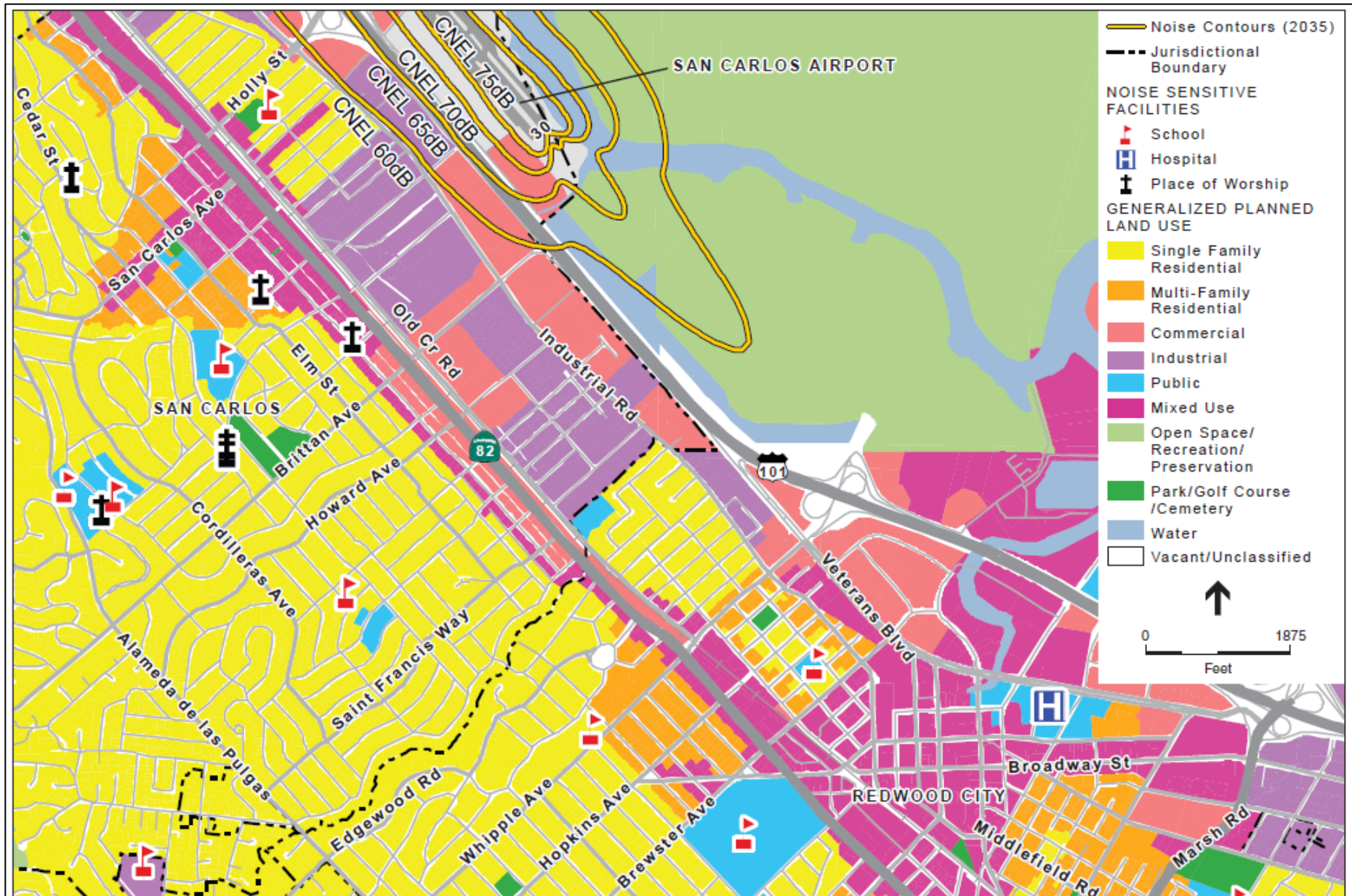
⁴⁵ City/County Association of Governments of San Mateo County. 2019. Comprehensive Land Use Compatibility Plan for the Environs of San Carlos Airport. Adopted October 2019.



Source: Illingworth & Rodkin, 2026

FIGURE 6

2022 Forecasted Palo Alto Airport Noise Contour Map
Menlo-Atherton High School Facilities Master Plan



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

FIGURE 7
 2035 Noise Contours of the San Carlos Airport
 Menlo-Atherton 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

6.14.1 Environmental Setting

The project site is located within the Town of Atherton in San Mateo County at the borders with the City of Menlo Park. In 2023, the Town of Atherton population was estimated at approximately 7,021 residents, with 2,266 households and an average household size of 2.81 persons.⁴⁶ During that same year, the City of Menlow had a total population of approximately 33,780 residents, with 11,624 households, and an average household size of 2.71.⁴⁷ At the county level, San Mateo County had an estimated population of 726,353 residents and 265,124 households, with an average household size of 2.69 persons.⁴⁸

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 proposed project would implement the proposed FMP improvements at the Menlo-Atherton High School. The project does not propose new housing or commercial businesses. In addition, it 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 proposed 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 proposed project would not induce population growth, or 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. 2023: ACS 5-Year Estimates Subject Tables. <https://data.census.gov/table/ACSST5Y2023.S1101?t=Housing&g=160XX00US0603092>. Accessed: September 8, 2025.

⁴⁷ U.S. Census Bureau. 2023: ACS 5-Year Estimates Subject Tables. <https://data.census.gov/table/ACSST5Y2023.S1101?q=Menlo+Park+city,+California&t=Families+and+Household+Characteristics>. Accessed November 24, 2025.

⁴⁸ U.S. Census Bureau. 2023. 2023: ACS 5-Year Estimates Subject Tables. <https://data.census.gov/table/ACSDP1Y2023.DP05?q=San+Mateo+County,+California>. Accessed: September 8, 2025.

6.15 Public Services

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

6.15.1 Environmental Setting

Fire Protection

The Menlo Park Fire Protection District provides fire suppression and emergency medical services to the Menlo Park, Atherton, East Palo Alto & Unincorporated San Mateo County. The District operates seven fire stations. The closest facility to the project site is Station 1, located approximately 0.4 mile to the southeast at 300 Middlefield Road.

Police Protection

Police protection services in the Town of Atherton are provided by the Atherton Police Department. The Department is responsible for ensuring public safety, including law enforcement, crime prevention, traffic enforcement, and community policing within the Town’s boundaries. The Department operates out of its headquarters at 83 Ashfield Road, located approximately 1 mile west of the project site.

Schools

Public education in the Town of Atherton is provided by several school districts depending on grade level and residential location. Elementary and middle school students (K–8) attend schools within the Menlo Park City School District, the Las Lomas Elementary School District, or the Redwood City School District. At the high school level (grades 9–12), all Atherton

students are served by the District, with Menlo-Atherton High School designated as the primary high school for the community.

Parks

Recreational opportunities in the vicinity of the project site include neighborhood parks, community parks, open space preserves, and trail systems. Together, these parks and facilities provide a diverse range of active and passive recreation opportunities for residents and students in the project vicinity. The closest public park is Seminary Oaks Park, located approximately 0.2 mile southeast of the campus. This neighborhood park features open turf areas, picnic tables, and a children’s play structure, making it a popular destination for families and nearby residents.

Approximately 0.5 mile south of the campus is the Arrillaga Family Recreation Center and the adjacent Burgess Park. The Arrillaga Family Recreation Center provides indoor facilities for fitness, cultural activities, and community events. Burgess Park is one of Menlo Park’s primary recreational hubs, offering sports fields, tennis courts, a swimming pool complex, playgrounds, and picnic areas, as well as connections to the city’s bicycle and pedestrian pathways. Located about 0.7 mile west of the campus, Holbrook-Palmer Park includes athletic fields, tennis courts, a playground, picnic areas, and expansive lawns, and also serves as the site of community events, recreational programs, and private gatherings.

- 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 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 nearby Station 1 and is within the Menlo Park Fire Protection District service area. 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 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 Atherton Police Department to provide adequate service.

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

Schools

The proposed project would involve redevelopment and improvements within the existing Menlo-Atherton 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 Menlo Park City School District, Las Lomas Elementary School District, Redwood City School District, or the Sequoia Union High School District. 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 Menlo-Atherton High School campus. While the project would enhance educational and athletic facilities for students, it would not increase student enrollment or otherwise expand campus capacity. As such, the project would not generate additional demand for neighborhood or community parks, open space preserves, or trail systems in the project vicinity.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.16.1 Environmental Setting

The San Mateo County Parks Department operates 24 parks and open spaces encompassing over 16,000 acres with almost 190 miles of trails, including regional and local trails.⁴⁹ These parks include a variety of natural settings—coastal, wooded, marine, bayside, etc.—and serve nearly 3 million visitors annually.⁵⁰ The City of Menlo Park maintains 17 parks listed on its official parks inventory.⁵¹

As noted above in the Public Services section, several parks are situated near the project site, including Seminary Oaks Park, approximately 0.2 miles southeast of the campus; the Arrillaga Family Recreation Center and the adjacent Burgess Park, about 0.5 miles south; and Holbrook-Palmer Park, located roughly 0.7 miles to the west.

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 of 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***.

⁴⁹ County of San Mateo. 2025. About the San Mateo County Park Department <https://www.smcgov.org/parks/about-san-mateo-county-parks-department>. Accessed September 12, 2025.

⁵⁰ County of San Mateo. 2025. San Mateo Parks Celebrates 100 Years <https://www.smcgov.org/parks-100>. Accessed: September 12, 2025.

⁵¹ City of Menlo Park. 2025. Parks. <https://menlopark.gov/Parks>. Accessed September 12, 2025.

- 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

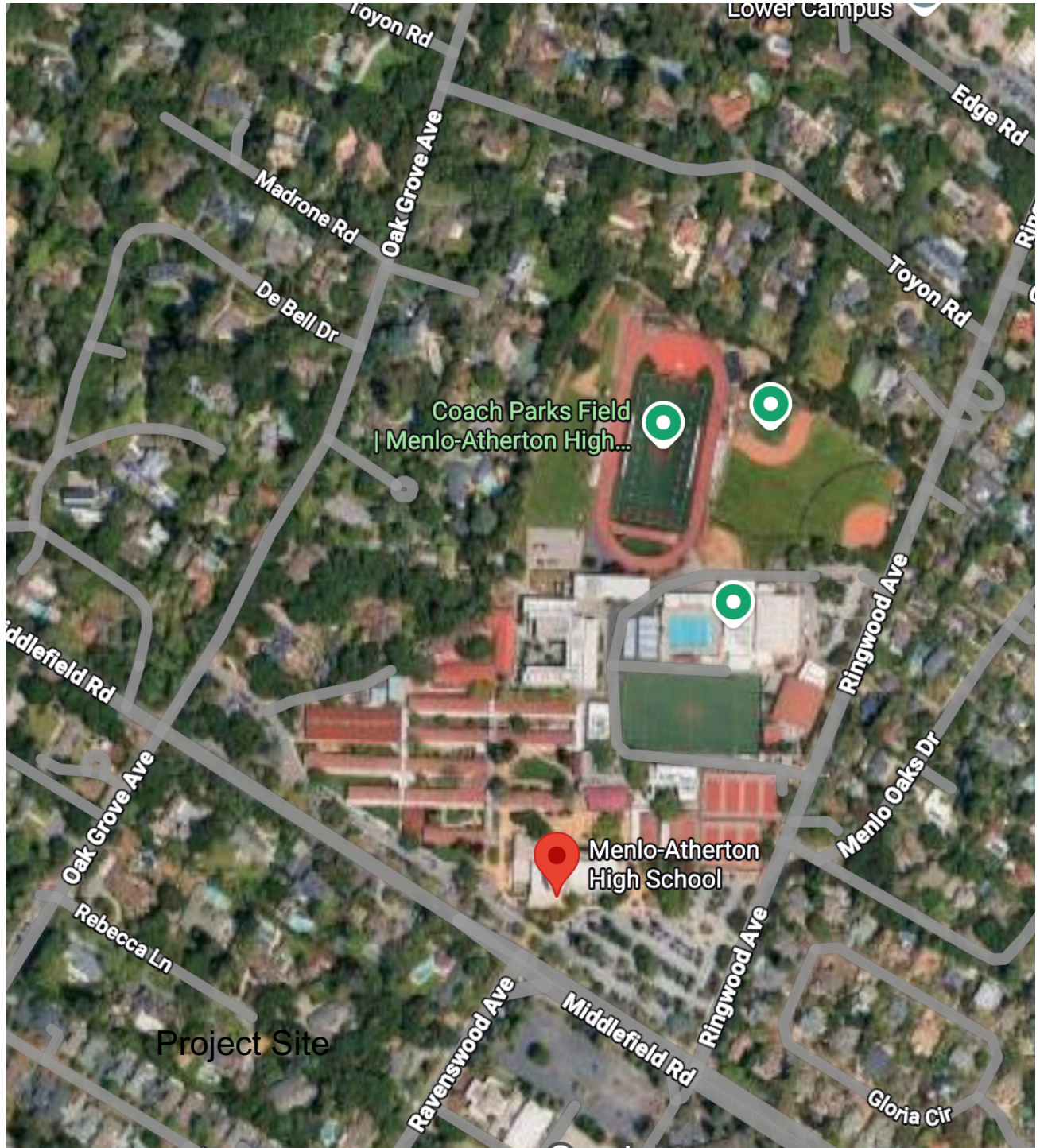
6.17.1 Environmental Setting

Existing Roadway Network

The project site is located on the block bounded by Middlefield Road to the south, Ringwood Avenue to the east, Toyon Road to the north, and Oak Grove Avenue to the west (**Figure 8**). The site is primarily surrounded by single-family homes. Nearby non-residential uses include office buildings with surface parking lots to the southeast at the intersection of Middlefield Road and D Street. There is also a Christian Science Church directly to the south, at the corner of Middlefield Road and Ravenswood Avenue. Highway 101 (US-101), and State Route 82 (SR-82 or El Camino Real) provide regional access to the project site. Middlefield Road, Ringwood Avenue, and Oak Grove Avenue are roadways providing direct access to and from the project site. Middlefield Road is a north-south minor arterial corridor that provides access through the town (**Figure 1**). Ringwood Avenue and Oak Grove Avenue are collectors that provide direct access to El Camino Real and US-101.

Existing Site Access

There is a faculty and staff parking lot along the southern boundary of the site near Middlefield Road, with access provided via a driveway on Oak Grove Avenue. There are also two student parking areas: the Senior Lot, located near the Performing Arts Center, and the T-Lot, located near the baseball field. Both serve students with valid permits and are accessed via driveways on Ringwood Avenue. Students' pick-up and drop-off primarily occur via the driveway on Ringwood Avenue leading to the Senior Lot. A secondary location is available at the driveway on Ringwood Avenue that provides access to the T-Lot. Additionally, school buses pick up and drop off students at a designated area near the front entrance of the Performing Arts Center and curbside along Ringwood Avenue adjacent to the T-Lot.



Source: Google, 2026

FIGURE 8
Nearby Roadway Network
Menlo-Atherton High School Facilities Master Plan

In addition to access from the major streets, there is also an unpaved service road that runs along the northeastern boundary of the site, primarily used by maintenance vehicles, and a paved service road along the northwestern boundary of the site, providing access to the football stadium.

Existing Bicycle and Pedestrian Facilities

Striped bicycle lanes (Class II bicycle facilities) are provided along Middlefield Road and Ringwood Road adjacent to the project site as well as along Oak Grove Avenue and Ravenswood Avenue south of the project site. The project site provides approximately 430 bicycle parking spaces, including a 300-stall rack near the tennis courts along Ringwood Avenue and a 130-stall rack in the northwest corner of the faculty and staff parking lot. Additionally, there are four bicycle cages provided, including one cage in the staff parking along Oak Grove Avenue and four cages near the tennis courts.

Sidewalks are provided on Middlefield Road and Ringwood Road adjacent to the project site and provide access to the nearest bus stops to the project site as described in the next subsection. Sidewalks are not provided on the segment of Oak Grove Avenue along the western boundary of the project site; However, this segment of Oak Grove Avenue north of Middlefield Road is only approximately 150 feet in length along the project site and is typical configuration for local access roadways in Atherton. Signalized crossings are provided along Middlefield Road at the intersections with Ringwood Avenue, Ravenswood Avenue, and Oak Grove Avenue.

There are multiple access points to the project site for bicyclists and pedestrians along Middlefield Road and Ringwood Avenue, separated from vehicular driveways. Within the project site, there are internal pedestrian pathways providing connections to classroom buildings, administrative offices, and athletic facilities.

Existing Transit Services

Existing transit services near the project site include buses operated by the San Mateo County Transit District (SamTrans) and commuter rail services provided by Caltrain. The closest bus stops to the project site are located on Ringwood Avenue near its intersection with Middlefield Road and on Middlefield Road near its intersection with Oak Grove Avenue. These stops primarily serve SamTrans Routes 296, 81, and 86, and are accessible via sidewalks along Ringwood Avenue and Middlefield Road, as well as signalized crosswalks at the intersections of Middlefield Road with Ringwood Avenue and Oak Grove Avenue. The closest Caltrain station, Menlo Park Station, is approximately two-thirds of a mile from the project site and accessible via Ravenswood Avenue.

Existing Emergency Access

Emergency vehicles can access the project site from the driveways on Ringwood Road and Oak Grove Avenue. Below is a list of emergency response centers (including fire stations, police departments, and emergency medical services) at proximity to the project site:

Fire stations closest to the project site include:

- Menlo Park Fire Protection District (Middlefield Road and Santa Margarita Avenue) located approximately 1.2 miles away and accessed via Middlefield Road, and
- Menlo Park Fire Protection District Station No. 6 (Oak Grove Avenue and Hoover Street) located approximately 1.2 miles away and accessed via Oak Grove Avenue.

Police stations closest to the project site include:

- Menlo Park Police Department (Ravenswood Avenue and Laurel Street) located approximately 0.8 miles away and accessed via Middlefield Road and Ravenswood Avenue, and
- Atherton Police Department (Fair Oak Lane and Dinkelspiel Station Lane) located approximately 2.3 miles away and accessed via Middlefield Road and Fair Oak Lane.

Emergency medical services closest to the project site include:

- Sutter Health Palo Alto Center Urgent Care (El Camino Real and Wells Avenue) located approximately 2.3 miles away and accessed via Middlefield Road, Ravenswood Avenue, and El Camino Real, and

Stanford Hospital Emergency Department (Quarry Road and Campus Drive) located approximately 3 miles away and accessed via Middlefield Road, Ravenswood Avenue, El Camino Real, and Quarry Road.

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

Project construction would not significantly obstruct transit, roadway, bicycle, or pedestrian facilities in the area, as all construction activities would occur onsite and not within the public right-of-way. Construction material staging would also be fully contained on-site within the designated boundary limits of each new building or near other proposed improvements. No lane narrowing and/or lane closures, sidewalk and pedestrian crosswalk closures, or bike lane closures are anticipated during project construction. The proposed project would have to comply with the District's SCM-8, which requires the implement traffic control measures designed to maintain safe and efficient circulation for vehicles and pedestrians on public streets affected by construction. Therefore, the proposed project would not disrupt circularion near the project site during construction or conflict with existing program, plan, ordinance, or policy related to the circulation system.

The planned construction truck route for the project includes access to the campus via the driveway on Ringwood Avenue, south of the Upper Turf Field. This driveway also provides direct access to the bike rack near the tennis courts. To minimize potential conflicts between truck traffic and bicyclists on-site, the project would incorporate clear signage and temporary barriers near the bike racks to separate truck traffic from bike access and schedule construction deliveries outside of the peak arrival and dismissal times.

Project operation would not disrupt any existing or planned facilities or services, or conflict with any program, plan, ordinance, or policy addressing the circulation system because the proposed FMP is not expected to result in an increase in student enrollment; instead, it focuses on modernizing or replacing existing campus facilities. Consequently, campus operation is

anticipated to continue in a manner consistent with current conditions once construction is complete. The project would not change travel to and from the school and therefore would not add a substantial volume of pedestrian or bicycle traffic along routes without adequate bicycle and pedestrian facilities such as crosswalks, sidewalks, and bike lanes. The project would not remove any facilities designed to protect pedestrians and bicyclists, nor would it interfere with the planned bicycle facility improvements along Middlefield Road outlined in the Town of Atherton Bicycle and Pedestrian Master Plan, or the intersection improvements at Middlefield Road and Ringwood Avenue identified in the Town of Atherton General Plan Circulation Element and the City of Menlo Park Transportation Master Plan.

Within the project site, the project includes improvements to existing pedestrian pathways on the south and east sides of the B-Wing South building, as well as the construction of new pathways connecting the new weight room to existing stadium entrances and providing access to the new stadium bleachers and press box.

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

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

During the largest construction activities, such as the replacement of the E-Wing and D-Wing South classroom buildings, the construction workforce is anticipated to average 50 workers per day, with a maximum of 75 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 make one round-trip commute per day and parks on campus near the staging area, an average of approximately 100 construction worker commute trips would occur daily, with a maximum of 150 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 125 per day on average, with a maximum of 200 trips on peak days during temporary construction of the project.

While the project construction would result in a temporary increase in vehicle trips due to workers commuting to and from the site, as well as the delivery and hauling of project materials, the number of construction-related vehicle trips is small compared to the daily trip generation from school operations. Based on the July 2015 *MAHS Campus Facilities Master Plan Final Program Environmental Impact Report (EIR)*, the campus is estimated to generate a total of 6,950 vehicle trips daily. The maximum number of construction-related trips during school year (200 trips) is only approximately three percent of the daily campus vehicle trip generation. The project would source its construction workforce locally, within the greater Bay Area, to minimize workers' commute distances and thereby reduce impacts associated with vehicle miles traveled (VMT). In addition, construction traffic is a temporary condition that only occurred during the project construction period and does not contribute to sustained increases in vehicle miles traveled over time. Although construction is expected to occur over four years, peak construction traffic would only occur during the construction of the new building, which is scheduled to last about two years. During the remaining construction period, traffic levels are not expected to be at their peak. Therefore, project construction would not cause a substantial increase in roadway travel and VMT. In addition, as noted above, the proposed project would

have to comply with the District's SCM-8, which requires the 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, and scheduling truck trips during non-peak hours.

Since the proposed FMP assumes no increase in student enrollment, project operation is not anticipated to generate new vehicle traffic or constitute an increase in roadway travel. Therefore, the project construction and operation would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). This impact would be ***less than significant***.

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

Construction activities would occur entirely on-site and therefore would not create hazardous conditions for bike lanes or sidewalks within the public right-of-way or affect transit services. All construction material staging would be fully contained within the designated boundary limits of each new building, while renovation materials would be stored in secure, fenced areas adjacent to their respective renovation sites. This would ensure that construction equipment and materials are kept clear of bicycle and pedestrian travel paths on campus, thereby preventing potential hazards. Signage, lighting, and flaggers could be used as needed to clearly delineate construction zones and prevent bicycles and pedestrians from approaching construction activities. Construction loading and worker parking would occur near the designated staging area, separate from student and staff parking, students' pick-up/drop-off zones, and other typical campus loading areas. They would also be scheduled to avoid peak arrival and dismissal times, as well as typical campus loading periods, in compliance with SCM-8, thereby reducing the risk of hazardous conditions caused by loading and parking conflicts.

Access to the project site would remain consistent with current conditions since the project would not remove or introduce new vehicle, pedestrian or bicycle access points nor create new geographic design features that would introduce hazards. In addition, the proposed FMP assumes no increase in student enrollment; consequently, project operations are not anticipated to generate new parking or loading demand that would result in potentially hazardous conditions.

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

d) *Result in inadequate emergency access?*

Emergency vehicles in the area typically use major streets when heading to and from an emergency and/or emergency facility. Major streets allow emergency vehicles to travel at higher speeds and permit other traffic to maneuver out of the path of the emergency vehicles. Non-emergency vehicles are required to yield to emergency vehicles, as stated by the California Vehicle Code.

All emergency response centers in proximity to the project site (including fire stations, police station, and emergency medical services) can access to and from the project site via the following major streets: Ringwood Avenue, Oak Grove Avenue, Middlefield Road, Ravenswood

Avenue, and El Camino Real. Since all construction activities occur on-site, the project would not physically block any roadways providing access to and from the project site discussed above or result in traffic congestion that could significantly compromise timely access of emergency vehicles within the project area.

Upon arriving at the site, emergency vehicles would have adequate direct entry and exit via driveways on Ringwood Avenue and Oaks Grove Avenue. While the driveway on Ringwood Avenue south of the Upper Turf Field and the driveway providing access to the T-Lot would be on the planned construction route, truck activities would not be expected to result in a significant increase in vehicular traffic at the driveway. Arrivals at the driveway would be coordinated to avoid simultaneous entry and exit, ensuring that access routes for emergency vehicles remain clear. Construction parking would take place at the designated staging area, separate from student and staff parking, students' pick-up/drop-off, and other typical campus loading activities, thereby avoiding inadequate access for emergency vehicles due to parking overflow.

Furthermore, the project would not include any design features that would impact emergency vehicle access along the designated emergency evacuation routes in the Circulation Element, which include Middlefield Road and Ringwood Avenue. Therefore, 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)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?*
- b) *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?*

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

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

A resource determined by the lead agency—in its discretion and supported by substantial evidence, to be significant—pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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

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

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

On July 16, 2025, the District sent AB 52 outreach letters to the tribes listed in the contact list provided by the Native American Heritage Commission (NAHC) on April 29, 2025. The letters sent described the project, provided maps of the project site, and invited the tribes to request consultation should they have any concerns. On August 8, 2025, the Kanyon konsulting LLC responded on behalf of the Indian Canyon Band of Costanoan Ohlone People to request formal tribal consultation. On August 13, 2025, Tamien Nation also responded to request formal tribal consultation under the provisions of CEQA (Public Resource Code Section 21080.3.1 subdivisions (b), (d), and (e) for the mitigation of potential project impacts to tribal cultural resources for a project within the Tribe ancestral land.

On September 9, 2025, the District provided Kanyon Konsulting, LLC and Tamien Nation with the Cultural Resources Assessment Report and the Geotechnical analyses prepared for the project site. The District also invited both tribes to a formal consultation meeting. At the time of the preparation of this document, the District had not received a response from Kanyon Konsulting, LLC.

On October 1, 2025, representatives from Tamien Nation met with the District and discussed the proposed FMP at the project site. The Tribe indicated during the meeting that they do not have any concerns at this time but wished to review the project details further. In response to their request, on October 6, 2025, the District emailed them a link to the proposed Facilities Master Plan and invited any follow-up questions or requests for further discussion. As no response was received, on November 6, 2025, the District emailed Tamien Nation noting the conclusion of the consultation and its obligation to consult under AB 52.

The District will continue to include the both Tribes on all public notifications that are part of the CEQA process and will proceed with the formal consultation when contacted by the Tribe. In addition, pursuant to Public Resources Code § 21080.3.1,(d), if the District is to make a decision with respect to approving the project, the District will provide a formal notification to the designated Tribes contact, 14 days before the decision date.

Tribal Cultural Resources

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

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

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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.19.1 Environmental Setting

Water Supply

Water services in the Town of Atherton are provided primarily by California Water Service (Cal Water), Bear Gulch District. The Town’s water utility system encompasses infrastructure and sources that support residential, commercial, and institutional customers in Atherton and some adjacent communities.⁵² Approximately 11% of Bear Gulch’s water supply comes from its own watershed. Cal Water owns a 1,200-acre watershed in the Woodside hills, which feeds surface runoff to Bear Gulch Reservoir and is treated at its Atherton treatment facility. The majority of the supply—roughly 85-95%—is imported from the San Francisco Public Utilities Commission (SFPUC) system.⁵³

Wastewater

The West Bay Sanitary District (WBSD) provides wastewater collection and conveyance services for the Town of Atherton (and neighboring areas, including Menlo Park and Portola

⁵² California Water Service. 2025. Bear Gulch. <https://www.calwater.com/district/bear-gulch>. Accessed: September 16, 2025.

⁵³ California Water Service. 2025. Bear Gulch <https://www.calwater.com/district/bear-gulch>. Accessed: September 16, 2025.

Valley).⁵⁴ The sewage collected in Atherton is treated at the Silicon Valley Clean Water (SVCW) treatment facility. This facility handles secondary treatment and discharges treated effluent to the San Francisco Bay. Raw wastewater is transported via trunk sewers, pump stations (notably, the Menlo Park Pump Station), and force mains to SVCW.

Solid Waste

Atherton's solid waste collection, recycling, and organic waste (yard trimmings, compostables) are provided by GreenWaste Recovery.⁵⁵ Atherton also enforces a Waste Reduction and Recycling Plan for construction and demolition projects. Permits require demonstration of waste diversion.⁵⁶ Waste from Atherton is sent to Ox Mountain Sanitary Landfill, located in Half Moon Bay, San Mateo County. The landfill takes care of various waste streams including typical household waste and accepts recyclables and yard waste drop-offs under specified conditions.⁵⁷ The Ox Mountain Sanitary Landfill is estimated to reach capacity in 2034.⁵⁸

Electricity and Natural Gas

Natural gas and electricity services in Atherton, California, are provided by multiple entities. Pacific Gas & Electric Company (PG&E) is the natural gas provider for Atherton and other communities in San Mateo County.⁵⁹ For electricity, Atherton residents are served by Peninsula Clean Energy (PCE), a non-profit joint powers agency and Community Choice Aggregation (CCA) program formed by San Mateo County and its 20 cities.⁶⁰ While PCE supplies the electricity, PG&E continues to own and maintain the power lines and delivers the power, sending a consolidated bill to customers.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?*

The proposed FMP project involves the modernization and redevelopment of existing campus facilities, including updated classroom and support spaces. Temporary water demand would occur during construction activities, after which water use would continue to support normal

⁵⁴ West Bay Sanitary District. 2025. Services. <https://www.westbaysanitary.org/services>. Accessed: September 16, 2025.

⁵⁵ Town of Atherton. 2025. Reduce Your Waste: GreenWaste Recovery <https://www.ci.atherton.ca.us/482/Reduce-Your-Waste-GreenWaste-Recovery>. Accessed September 16, 2025.

⁵⁶ Atherton Municipal Code. 2025. Chapter 15.52. Recycling and Diversion of Debris from Construction and Demolition. <https://atherton.municipal.codes/Code/15.52>. Accessed September 16, 2025.

⁵⁷ Recyclestuff.org. 2025. Ox Mountain Sanitary Landfill. <https://recyclestuff.org/company/ox-mountain-sanitary-landfill-94019>. Accessed September 16, 2025.

⁵⁸ County of San Mateo. 2018-2019 San Mateo County Civil Grand Jury. Planning for the County's Waste Management Challenge. https://sanmateo.courts.ca.gov/system/files/waste_management.pdf. Accessed September 16, 2025.

⁵⁹ Town of Atherton. Utilities. Electricity and Gas. <https://www.ci.atherton.ca.us/238/Electricity-Gas>. Accessed September 16, 2025.

⁶⁰ Town of Atherton. Clean Energy and Energy Efficiency. <https://www.ci.atherton.ca.us/479/Clean-Energy-Energy-Efficiency#:~:text=Visit%20the%20Bay%20Area%20Regional,Build%20all%20electric>. Accessed September 16, 2025.

⁶¹ Peninsula Clean Energy. The Difference between PCE and PG&E. <https://www.peninsulacleanenergy.com/> Accessed September 16, 2025.

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

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

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

c) *Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?*

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

d) *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Implementation of the proposed project would generate solid waste during both construction and operation. Construction activities would result in temporary solid waste generation associated with demolition, site preparation, and building activities. The proposed project would comply with the District's construction waste management and disposal regulations, which require preparation of a Waste Management Plan detailing procedures to achieve a minimum 65% salvage and recycling rate by weight or volume of the total waste generated. The project would also 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 District and state regulations would ensure that construction-related solid waste is properly managed and diverted to the maximum extent feasible.

Utilities and Service Systems

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 project would continue to participate in existing solid waste and recycling collection programs provided by the Town's franchised hauler—GreenWaste Recovery.

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 District regulations for handling construction solid waste and with CALGreen Part 11, Title 24 of the California Code of Regulations mandating diversion of at least 65 percent of nonhazardous construction and demolition waste from landfills. Project operation would include participation in the Town of Atherton recycling programs. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

6.20.1 Environmental Setting

Fire protection within the project area is provided by the Menlo Park Fire District, which serves the cities of Menlo Park, Atherton, East Palo Alto and portions of San Mateo County. All fire agencies in San Mateo County have signed the California Master Mutual Aid Agreement and participate in mutual aid operations as required for backup. The Menlo Park Fire District also has specific Mutual Aid agreements with the cities of Palo Alto and Redwood City.

Atherton does not have any officially designated fire hazard zones, and the California Department of Forestry and Fire Protection (CAL FIRE) has no records of historical wildfires within the town. However, CAL FIRE classifies the land south of Alameda de Las Pulgas as a Wildland-Urban Interface (WUI) zone, which is an area where development is adjacent to or intermingled with vegetation that is susceptible to wildfire.⁶² The WUI is approximately 2.5 miles southwest of the school.

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

The campus is within a developed area in the Town of Atherton, 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 WUI is located at approximately 2.5 miles southwest of the project site. The Menlo Park Fire District currently serves the project site and

⁶² PlaceWorks. 2025. Peninsula Resilience Planning Project. Town of Atherton Vulnerability Assessment Summary. Prepared for the Town of Atherton. March.

would continue to provide these services after the implementation of the FMP improvements. The proposed project would replace or renovate existing buildings. Construction or operation of the proposed project would not cause permanent alterations to vehicle circulation routes and patterns or impede public access or travel upon public rights-of-way. The proposed project would not be expected to impair the function of nearby emergency evacuation routes. The proposed project would be required to comply with standards of Chapter 7A of the California Building Code for the inclusion of fire-resistant ratings of buildings components, such as firestops, shaft enclosures, partitions, smoke barriers, floors, fire-resistive coatings, and sprayed fire-resistant materials, among other items. Design of the proposed buildings, including consistency with ingress and egress requirements and other applicable requirements, would be reviewed by the Menlo Park Fire District 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 Impact WD-1, above, the proposed project would be required to comply with standards of Chapter 7A of the California Building Code. The proposed project would also be subject to requirements in Section 13000 et seq. of the California Health and Safety Code, California Building Standards Code, and California State Fire Code, which include regulations concerning the following: building standards for fire protection, fire protection and notification systems such as extinguishers and smoke alarms, safety for firefighters and emergency responders during emergency operations, minimum standards for hazardous vegetation and fuel management, defensible space, and building construction, and minimum standards for emergency access and water supply for fire response. Compliance with these existing regulatory requirements would ensure that the proposed project would not exacerbate wildfire risks. This impact would be **less than significant**.

- c) *Require the installation of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

The proposed project involves the demolition, construction, and renovation of campus building within the project site. The proposed project would include connections to existing utility facilities including water, sanitary sewer, storm drainage, electricity, and telecommunication infrastructure. Utility connections would be within the campus and would not be within the public right of way. The project does not propose the installation or maintenance of any new roads, fuel breaks, emergency water sources, power lines, or other utilities that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Impacts would be ***less than significant***.

- d) *Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

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

6.21 Mandatory Findings of Significance

Environmental Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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, BIO-1b, 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 protect 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** would ensure that unanticipated archaeological resources and human remains 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**.

Mandatory Findings of Significance

- b) *Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

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

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

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

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

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

APPENDIX A

Air Quality - Emissions Analysis

APPENDIX B

Biological Resources Analysis