Sequoia Union High School District
Menlo Park Small High School Project

Final Environmental Impact Report

SCH# 2016022066

October 6, 2016

Sequoia Union High School District
480 James Avenue
Redwood City, CA 94062

NOTICE OF AVAILABILITY AND PUBLIC MEETING FINAL ENVIRONMENTAL IMPACT REPORT FOR THE MENLO PARK SMALL HIGH SCHOOL PROJECT

Date: October 6, 2016

To: California State Clearinghouse, CEQA Responsible and Trustee Agencies, federal agencies, San Mateo County Clerk, and interested individuals and organizations

Subject: **Final Environmental Impact Report (EIR) for the Menlo Park Small High School Project (SCH# 2016022066)**

Lead Agency: Sequoia Union High School District - 480 James Avenue, Redwood City, CA 94062

Applicant: Same as Lead Agency

Project Title: Menlo Park Small High School Project

Project Location and Description: The proposed Menlo Park Small High School Project would be located at 150 Jefferson Drive, in Menlo Park, in San Mateo County. This project location consists of a single, developed land parcel (Assessor's Parcel Number [APN] 055-243-030) which is approximately 2.1 acres in size and centered on 37°28'56" north latitude and 122°10'26" west longitude. The District is proposing to construct and operate a small, three-story high school facility with capacity to accommodate up to approximately 400 high school students and 35 faculty and staff. The proposed project would support high quality education and avoid overcrowding at District high schools, particularly in the southern part of the District. The District would open the new school in time for the 2018-2019 school year. The proposed project would involve the following components: removal of existing site facilities and construction of a new high school, operation of the new high school, and a potential partnership with the San Mateo County Community College District. On October 29, 2015, the District and the California Department of Toxic Substances Control (DTSC) Schools Division entered into an Environmental Oversight Agreement related to preparation of a Preliminary Environmental Assessment (PEA) report (DTSC Site Code 204273; Envirostor ID 60002163). The purpose of the PEA was to determine whether a release or potential release of hazardous substances that could pose a threat to human health (via ingestion, skin contact, or inhalation) or the environment could occur as a result of project construction and long-term operation. On June 13, 2016, the DTSC approved the PEA and found no further investigation or remediation of the site is required. Although the proposed school property has been subject to DTSC regulatory oversight, it is not a site listed pursuant to Government Code section 65962.5.

Final EIR Summary: The District prepared a Draft EIR to evaluate the potentially significant environmental impacts that may result from implementation of the proposed project. The Draft EIR was circulated for review from July 8, 2016 to August 22, 2016. The SUHSD received eight written comment letters on the contents of the Draft EIR, including letters from one state agency (the California Public Utilities Commission) and three local agencies (City of Menlo Park, Menlo Park Fire Protection District, and San Mateo County Department of Public Works).

The Final EIR includes revisions to the Draft EIR text, as well as written responses to all significant comments raised with respect to the environment. Text revisions and changes include:

- Additional information that provides more background and context for the EIR's setting descriptions and impact analysis.
- Revisions to Draft EIR Mitigation Measures TRA-1A, TRA-1B, TRA1-C, TRA-2B, TRA-2C. TRA-3A, TRA-3B, and TRA-3C. These revisions clarify and amplify the requirements in these measures that reduce and/or avoid potentially significant impacts that could occur with implementation of the Menlo Park Small High School Project.
- Addition of Mitigation Measures TRA-1D and TRA-1E to the EIR. These additions amplify the measures the District will implement to improve traffic circulation on local roads near the proposed Menlo Park Small High School.
- Text changes throughout the document that provide clarity to the analysis, make text corrections, or fix grammatical or typographic errors.

These revisions do not constitute considerably different changes in the project description, environmental setting, impact analysis findings, or the mitigation measures identified in the Draft EIR. Implementation of the Menlo Park Small High School Project would result in significant and unavoidable impacts to intersection level of service and roadway segments on both a project and cumulative level even with the implementation of feasible mitigation measures to reduce vehicle trips generated by school students and staff.

EIR Certification: The District's Board of Trustees is scheduled to consider approval of the Menlo Park Small High School Project and certification of the EIR at its regular meeting on the date and time below:

Wednesday, October 19, 2016 – 6:00 PM
Sequoia Union High School District
Birch Conference Room, Sanford Building
480 James Avenue, Redwood City, CA 94062

Document Availability: Hardcopies of the Final EIR are available for review at the following locations:

- SUHSD Main Office
  480 James Avenue
  Redwood City, CA 94062
- Menlo Park Public Library
  Main Library
  800 Alma Street
  Menlo Park, CA 94025
- Menlo Park Public Library
  Belle Haven Branch
  413 Ivy Drive
  Menlo Park, CA 94025

The Final EIR may also be reviewed or downloaded from the SUHSD's website:
http://www.seq.org/About-Us/Departments/Construction/index.html

Signature: Matthew S. Zito Date: October 6, 2016

Title: Chief Facilities Officer

Sequoia Union High School District
Menlo Park Small High School Project

Final Environmental Impact Report

SCH# 2016022066

October 6, 2016

Sequoia Union High School District
480 James Avenue
Redwood City, CA 94062

MENLO PARK SMALL HIGH SCHOOL PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT

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ACRONYMS, ABBREVIATIONS, AND SYMBOLS

Acronym / Symbol	Full Phrase or Description
ADT	Average Daily Traffic
BAAQMD	Bay Area Air Quality Management District
C/CAG	City / County Association of Governments (San Mateo County)
CA	California
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CCR	California Code of Regulations
CDE	California Department of Education
CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
CMP	Congestion Management Program
CPUC	California Public Utilities Commission
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
GHG	Greenhouse Gas(es)
HCM	Highway Capacity Manual
ITE	Institute of Transportation Engineers
LOS	Level of Service
MAHS	Menlo-Atherton High School
MERV	Minimum Efficiency Rating Value
MMRP	Mitigation Monitoring and Reporting Program
MPM	Menlo Park Travel Demand Model
NAHC	Native American Heritage Commission
NOA	Notice of Availability
NOC	Notice of Completion
NOP	Notice of Preparation
PEA	Preliminary Environmental Assessment
PRC	Public Resources Code
SCH	State Clearinghouse
SHS	Sequoia High School
SMCCCD	San Mateo County Community College District
SUHSD	Sequoia Union High School District
TDM	Travel Demand Management
TIA	Transportation Impact Analysis
TIF	Transportation Impact Fee
VTA	Santa Clara Valley Transportation Authority
%	Percent

CHAPTER 1 INTRODUCTION

This document is the Final Environmental Impact Report (Final EIR) for the Sequoia Union High School District's (SUHSD, or the District) Menlo Park Small High School Project. This new, state-of-the-art, small high school would be located on approximately 2.1 acres of land at 150 Jefferson Drive, east of the intersection of Chrysler Drive and Jefferson Drive, in the northern portion of the City of Menlo Park, in San Mateo County. In general, this SUHSD project would involve:

- SUHSD demolition of existing facilities at 150 Jefferson Drive;
- SUHSD construction and operation of a new, approximately 45,000 gross square-foot, three-story, small high school capable of serving 400 high school students and 35 faculty and staff; and
- A potential partnership with the San Mateo County Community College District (SMCCCD) to allow use of the SUHSD facilities for SMCCCD college instruction.

The SUHSD anticipates beginning site demolition in late 2016 and plans to open the new school in time for the 2018-2019 school year (i.e., by August 2018).

Per California Environmental Quality Act (CEQA) Guidelines section 15132, the Final EIR shall consist of:

- The Draft EIR or a revision of the draft
- Comments and recommendations on the Draft EIR either verbatim or in summary
- A list of persons, organizations, and public agencies commenting on the Draft EIR
- The responses of the Lead Agency to significant environmental points raised in the review and consultation process
- Any other information added by the Lead Agency

1.1 ENVIRONMENTAL REVIEW PROCESS

The SUHSD determined that the implementation of the proposed Menlo Park Small High School Project would have the potential to have a significant impact on the environment and that an EIR would be prepared pursuant to CEQA. Accordingly, the SUHSD issued a Notice of Preparation (NOP) for an EIR for the proposed project on February 19, 2016. The SUHSD distributed the NOP to state agencies via the State Clearinghouse and directly mailed the NOP to the California Department of Toxic Substances Control (DTSC), potential local responsible agencies such as the City of Menlo Park, certain federal agencies, and more than 200 other potentially interested agencies, organizations, and individuals, including tenants and property owners within 500 feet of the proposed school site (see Draft EIR Appendix A). The SUHSD also posted the NOP for review at the San Mateo County Clerk's Office, the SUHSD's offices in Redwood City, California, and the proposed project site (150 Jefferson Drive). The SUHSD provided a 35-day public review period for the NOP from February 19, 2016 to March 25, 2016. The SUHSD received written comments in response to the NOP from two state agencies and four local agencies and other interested members of the public. These comments were summarized in section 3.2 of the Draft EIR and presented in full in Appendix A of the Draft EIR. State and local agencies commenting on the NOP included the California Department of Transportation

(Caltrans), the California Native American Heritage Commission (NAHC), and the West Bay Sanitation District.

Preparation of the Draft EIR involved addressing comments on the NOP, reviewing project plans and documents, conducting additional research, and evaluating potentially significant adverse impacts pursuant to CEQA. The Draft EIR included an analysis of cumulative impacts and alternatives that could reasonably achieve most of the objectives for the project and avoid or substantially lessen the significant environmental impacts associated with the project.

The SUHSD issued a Notice of Completion (NOC) and Notice of Availability (NOA) for the Draft EIR for the proposed project on July 8, 2016. The SUHSD distributed the NOC, NOA, and the Draft EIR (on compact disc) to state agencies via the State Clearinghouse. The SUHSD directly mailed the NOA and the Draft EIR (on disc) to the DTSC, Caltrans, potential local responsible agencies such as the City of Menlo Park, and certain federal agencies; the NOA was directly mailed to more than 100 other potentially interested agencies, organizations, and individuals. The SUHSD also posted the NOA for review at the San Mateo County Clerk's Office, the SUHSD's main offices in Redwood City, and the proposed project site. Finally, the SUHSD provided hardcopies of the Draft EIR for review at the SUHSD's main offices in Redwood City and two City of Menlo Park Public Library branches (the Main Library and the Belle Haven Branch). The distribution list for the Draft EIR is included as new Appendix I to the EIR. The SUHSD provided a 45-day public review period for the Draft EIR from July 8, 2016 to August 22, 2016. The SUHSD received eight written comment letters pertaining the contents of the Draft EIR, including comments from one state agency (the California Public Utilities Commission, or CPUC), three local agencies (Menlo Park City Manager's Office, Menlo Park Fire Protection District, and San Mateo County Department of Public Works), and three other interested organizations and members of the public. Upon completion of the public review period, written responses to all significant comments raised with respect to the environment were prepared and incorporated into this Final EIR. Written responses to comments received from public agencies have been made available to those agencies at least 10 days before the SUHSD considers certification of the Final EIR. The comments received on the Draft EIR and their responses will be considered by the SUHSD's Board of Trustees when deciding whether or not to certify the Final EIR and approve the Menlo Park Small High School Project.

1.2 CHANGES TO THE DRAFT EIR

CEQA anticipates that the public review process will elicit information that can result in modification of the project design and refined impact analysis to reduce potential environmental effects of the project. As provided in CEQA Guidelines section 15088.5, when significant new information is added to the EIR after public noticing of the Draft EIR, the EIR must be recirculated to give the public a meaningful opportunity for review. Significant new information is defined as 1) a new significant environmental impact, 2) a substantial increase in the severity of an environmental impact requiring new mitigation, or 3) a feasible project alternative or mitigation measure considerably different from those previously analyzed that would clearly reduce environmental impacts. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

This Final EIR includes the following modifications to the Draft EIR:

- Additional information that provides more background and context for the EIR's setting and impact analysis.

- Revisions to Draft EIR Mitigation Measures TRA-1A, TRA-1B, TRA-1C, TRA-2B, TRA-2C, TRA 3A, TRA-3B, and TRA-3C. These revisions clarify and amplify the requirements in these measures that reduce and/or avoid potentially significant impacts that could occur with implementation of the Menlo Park Small High School Project.
- Addition of Mitigation Measures TRA-1D and TRA-1E to the EIR. These additions amplify the measures the District will implement to improve traffic circulation on local roads near the proposed Menlo Park Small High School.
- Text changes throughout the document to provide clarity to the analysis, make minor text corrections, or fix grammatical or typographic errors.

These revisions do not constitute considerably different changes in the project description, environmental setting, conclusions of the environmental analysis, or in the mitigation requirements incorporated into the project or otherwise provide significant new information that would require recirculation of the Draft EIR pursuant to CEQA Guidelines section 15088.5.

1.3 FINAL EIR ORGANIZATION

The Final EIR for the Menlo Park Small High School Project is as organized as follows:

- **Chapter 1, Introduction,** explains the contents of a Final EIR and the environmental review process for the Menlo Park Small High School Project.
- **Chapter 2, Additional Information,** describes and summarizes additional information related to the environmental analysis of the Menlo Park Small High School Project and the effect this information has on the discussions contained in the Draft EIR.
- **Chapter 3, Errata and Revisions,** includes the changes to the Draft EIR needed to address changes to the physical and regulatory setting, respond to comments, and clarify or amplify the information provided in the Draft EIR.
- **Chapter 4, Responses to Comments on the Draft EIR,** includes a summary of the written comments received on the Draft EIR and responses to significant environmental comments.
- **Chapter 5, Mitigation Monitoring and Reporting Program,** includes the District's program for monitoring and reporting on the implementation of mitigation measures incorporated into the Menlo Park Small High School Project EIR.
- **Appendix I, Draft EIR / Notice of Availability of a Draft EIR Distribution List,** includes a list of agencies, organizations, and members of the public that were sent the NOA for the Draft EIR and / or the Draft EIR.
- **Appendix J, Supplemental Traffic Analysis Memorandum (September 13, 2016),** includes additional traffic analyses that address comments received on the Draft EIR.
- **Appendix K, Greenhouse Gas Emissions Estimates,** includes an estimate of the proposed project's greenhouse gas emissions.

In accordance with section 15132 of the CEQA Guidelines, the Final EIR for the Menlo Park Small High School Project consists of this document and the July 8, 2016 Draft EIR, Volumes 1 and 2.

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CHAPTER 2 ADDITIONAL INFORMATION

This chapter presents additional information relevant to the environmental analysis of the Menlo Park Small High School Project. As discussed below, this new information clarifies and amplifies the information provided in the Draft EIR. None of the new information results in new significant environmental impacts or substantially increases the severity of the environmental impacts evaluated in the Draft EIR, and the new information does not involve feasible mitigation measures or project alternatives that the SUHSD is not electing to implement. As such, this new information is not considered significant pursuant to CEQA Guidelines section 15088.5 and does not require recirculation of the Draft EIR.

2.1 CHANGE IN SCHOOL START TIME

Draft EIR section 2.2.3 describes that the proposed Menlo Park Small High School would operate on a traditional schedule and have classes in session from about 8:15 or 8:30 AM to 3:30 or 3:45 PM; however, the SUHSD Board of Trustees has adopted a policy that prohibits the regular school day (i.e., first period) from starting before 8:30 AM. Accordingly, most SUHSD schools actually begin first period after 8:30 AM, including:

- Carlmont High School typically starts at 8:57 AM on Monday, Tuesday, Thursday, and Friday and 9:43 AM on Wednesday
- Menlo-Atherton High School typically starts at 8:45 AM on Monday, Tuesday, and Friday and 9:25 AM on Wednesday and Thursday
- Redwood High School typically starts at 8:45 AM every day
- Sequoia High School typically starts at 8:30 AM every day
- Woodside High School typically starts (for most students) at about 9:00 AM every day

In light of current policy, the SUHSD has changed the proposed start time for the Menlo Park Small High School Project to be no earlier than 8:30 AM. In addition, as shown in section 3.4 of this Final EIR, the SUHSD has clarified Mitigation Measure TRA-1A to indicate that a regular late start time (no later than 9:00 AM) or one or more late start days are possible options for achieving the travel mode split standard established by revised Mitigation Measure TRA-1A. While policy prohibits the regular school day from starting before 8:30 AM, the SUHSD notes that some students typically attend a "zero" period that begins before the start of the regular school day. The SUHSD anticipates that, should a zero period be offered at the proposed Menlo Park Small High School, the number of students participating in the program would be approximately 10 to 15% of the student population. Thus, if a zero period was offered at the school (which is not guaranteed), the net increase in the number of trips generated during the AM peak hour during an otherwise late start day would be approximately 20 vehicle trips[1], which is not considered substantial.

[1] Draft EIR Table 4-6 identifies the proposed school would have an AM peak hour trip generation rate of 0.88 trips per student and produce 354 AM peak hour trips at full enrollment levels (400 students). Multiplying full enrollment (400 students) by a 15 percent participation rate equals 60 students. Multiplying 60 students by the AM peak hour trip generation rate (0.88) equals 52.8 trips. After subtracting the number of trips generated by the existing land use (32; see Draft EIR Table 4-6), the net increase in trips during the AM peak hour would be 20.8.

2.2 ADDITIONAL BICYCLE AND VEHICLE PARKING

Draft EIR section 2.3.2 describes that the schematic design plans for the Menlo Park Small High School include 50 parking stalls lining the southern and western portions of the property (including two Americans with Disabilities Act accessible stalls), 20 racked bicycle parking spaces, and 3 bicycle lockers. Since publication of the Draft EIR in July 2016, the SUHSD has updated the project design to include additional on-site bicycle and vehicle parking as described below.

2.2.1 On-Site Bicycle Parking

The SUHSD has increased the number of on-site bicycle parking spaces from 20 to 60. Thirty bicycle parking spaces would be located on the northern side of the campus, within 200 feet of the school's main entrance, and 30 bicycle parking spaces would be located inside a gated area on the eastern side of the campus. For information purposes, 60 bicycle spaces equates to 15% of the proposed school's student population (400 students) and approximately 14% of the proposed school's student and staff population (435 students and staff). Thus, the proposed school would have the ability to accommodate much a higher bicycle travel mode split than that considered in the Traffic Impact Analysis prepared for the project, which conservatively estimated only five percent of students attending the Menlo Park Small High School would arrive via bike (equal to 20 students).

2.2.2 Potential Additional On-Site Vehicle Parking

The SUHSD has added on-site parking to the proposed school design by adding eight permanent parking spaces on the southeast corner of the school. These eight permanent parking spaces would replace approximately 875 square feet of grass / turf area, including a 400 square-foot bio-retention area. This loss of bio-retention area would not affect hydrology or water quality, as the proposed project would reduce impervious surfaces at the site eight percent below existing conditions. Thus, even with the loss of 875 square feet of grass / turf, the proposed project would still reduce impervious surfaces at the site by approximately seven percent.

In addition, the SUHSD has identified that up to nine short-term, temporary parking spaces could be provided in the school's loading and unloading lane. These temporary parking spaces would be for school visitors only, and only be available outside of school drop-off and pick-up times. Use of the loading and unloading lane for temporary parking would likely require the SUHSD to re-design the school's main entrance and perimeter road / fire lane to ensure the drive aisle provides sufficient width for fire and emergency access, and would thus require coordination with, and review by, the Menlo Park Fire Protection District (see Draft EIR section 2.3.2.1). Any potential redesign would not result in significant environmental impacts beyond that identified in the Draft EIR because the redesign is expected to consist of minor changes such as narrower sidewalks, or parking stall lengths, or landscaping strips.

These changes increase the total on-site parking from 50 to 58 permanent spaces for students and staff. As identified in Draft EIR Impact TRA-3, the project is estimated to need between 71 and 103 permanent parking spaces at full enrollment levels (435 students and staff). The additional permanent parking reduces the proposed project's estimated on-site parking deficiency from between 21 to 53 spaces to between 13 to 45 spaces. Identifying additional on-site parking was a requirement of Draft EIR Mitigation Measures TRA-3A. Thus, Draft EIR Mitigation Measure TRA-3A has been replaced with a requirement to control on-site parking with parking passes (see section 3.4 of this Final EIR).

2.3 ADDITIONAL TRAFFIC IMPACT ANALYSIS INFORMATION

Draft EIR section 4.3 explains that a Traffic Impact Analysis (TIA) was prepared for the project in accordance with the recommended methodologies set forth by the City of Menlo Park, the City/County Association of Governments of San Mateo County (C/CAG), and Caltrans. The Draft EIR summarizes information on the scope of the TIA (section 4.3.1), trip generation assumptions (section 4.3.2), trip distribution and assignment (section 4.3.3), and traffic scenarios evaluated (section 4.3.4). The Draft EIR explains that the TIA prepared for the project evaluated the addition of project trips to 11 intersections, 6 local roadway segments, 3 Congestion Management Program (CMP) roadway segments, and 1 freeway interchange (see Draft EIR section 4.3.1 and Draft EIR Tables 4-1 to 4-4).

Based on the comments received from the City of Menlo Park and San Mateo County during the 45-day public review period for the Menlo Park Small High School Project Draft EIR, the SUHSD is providing additional information on the TIA's trip generation and parking demand rates. The SUHSD has also updated the TIA methodology and provided supplemental analyses of certain roadway facilities. The updated methodology and supplemental analyses do not result in any new or more severe impacts than those identified in the Draft EIR. Rather, as summarized below and described in detail in Appendix J to this Final EIR, the updated analyses result in:

- Four less intersection impacts under near-term 2018 plus project conditions
- One less intersection impact under near-term 2021 plus project conditions
- Three less roadway segment impacts under near-term 2021 plus project conditions
- Two less roadway segment impacts under cumulative plus project conditions.

2.3.1 Trip and Parking Generation Counts

Draft EIR section 4.3.2 explains that the TIA prepared for the Menlo Park Small High School Project relied on trip generation counts conducted at Everest High School in Redwood City as the basis for the proposed school's trip generation rates. Similarly, the TIA and Draft EIR rely on parking generation rates based on information reported by Everest High School and East Palo Alto Academy (Draft EIR Impact TRA-3). The SUHSD selected these schools for trip and parking generation counts because they have similar characteristics to the proposed project, including similar enrollment capacity and attendance boundaries. The SUHSD is providing additional information on the location and suitability of these schools as a basis for evaluating the proposed project's potential trip and parking generation rates.

Everest High School

Everest High School is located at 455 5th Avenue in Redwood City. The school is generally surrounded by residential areas, although some commercial and industrial properties are located a few blocks to the east of the school. Everest High School is a college preparatory and charter high school available to all students in the SUHSD, with enrollment subject to a lottery system (similar to the proposed Menlo Park Small High School).

As explained in the Draft EIR (see footnote 10 on page 4-12), at the time the trip generation counts were conducted (April 2015), the school had an enrollment of 391 students (nearly equal to the proposed enrollment for the Menlo Park Small High School - 400 students). Data collected by the SUHSD at this time indicated that 47% and 76% of the students enrolled at Everest High School lived within a two and four mile radius of the school, respectively. Subsequent to the trip

counts, Everest High School provided information on the transportation mode split for its students and staff that indicated (SUHSD 2016):

- 214 out of 404 students and staff (approximately 53%) drive to school
- 95 out of 404 students and staff (approximately 24%) carpool to school
- 19 out of 404 students and staff (approximately 4.7%) bike to school
- 57 out of 404 students and staff (approximately 14%) skateboard or walk to school
- 19 out of 404 students and staff (approximately 4.7%) take public transportation to school

No students are bussed to Everest High School. Significant roadways and barriers within a two mile radius of the school include El Camino Real, Middlefield Road, and the Caltrain rail line. These high volume roadways and rail line are similar in nature to Marsh Road, Willow Road, and other features described in the Draft EIR, such as the Dumbarton Rail Corridor, that limit access to the proposed Menlo Park Small High School site (see Draft EIR sections 4.1.1, 4.1.2, and 4.1.3).

Everest High School has 72 on- and off-site vehicle parking spaces available to students and staff, 30 of which are reserved specifically for staff. The school has indicated that available on-street parking is used by students when necessary. The school also has bicycle racks with capacity for 40 bicycles.

East Palo Alto Academy

East Palo Academy is located at 1050 Myrtle Street in East Palo Alto. The school is surrounded by residential areas on the north and east, but large commercial areas on the south and west. Highway 101 (to the south) and University Avenue (to the east) are high volume roadways that limit non-vehicular access to the school site. At the time of the parking demand survey, the school had an enrollment of 317 students, with 30 staff. East Palo Alto Academy has also provided the SUHSD with information on the transportation mode split for its students and staff (SUHSD 2016). This information indicated:

- 50 students out of 347 students and staff (approximately 14%) are bussed to school
- 30 out of 347 students and staff (approximately 9%) drive to school
- 158 out of 347 students and staff (approximately 46%) carpool to school
- 10 out of 347 students and staff (approximately 3%) bike to school
- 98 out of 404 students and staff (approximately 28%) skateboard or walk to school
- 1 out of 347 students and staff (less than 1%) take public transportation to school

East Palo Alto Academy has 50 on-site parking spaces (open to both students and staff) and bicycle racks with capacity for 30 bicycles.

2.3.2 Updated Level of Service Analysis

The Draft EIR explains that the level of service (LOS) analysis contained in the TIA was completed using the VISTRO software and analysis model based on the Highway Capacity Manual 2000 methodology and information provided by the City of Menlo Park, which consisted of the preliminary intersection LOS calculations for the City's General Plan Circulation Update (dated January 2015).

During the 45-day public review period for the Draft EIR, the city commented that the SUHSD should conduct an updated level of service analysis that:

- Uses the latest Highway Capacity Manual (HCM) methodology
- Includes the existing second northbound right turn lane at the U.S. 101 Northbound Ramps and Marsh Road
- Includes the funded traffic signal at the intersection of Constitution Drive and Chrysler Drive

Accordingly, the SUHSD has updated the TIA LOS analysis to incorporate existing and funded intersection improvements and evaluate LOS operations using the HCM 2010 methodology. The results of the updated LOS analysis are summarized below and presented in full in Appendix J to this Final EIR (Hexagon 2016a).

Updated LOS Results

The updated LOS analysis does not substantially change the findings of the Draft EIR. The updated analysis did not identify any new or substantially more severe impacts than that identified in the Draft EIR. Rather, with the updated LOS analysis, the following adverse intersection impacts identified in the TIA and Draft EIR would no longer occur:

- U.S. 101 Northbound Ramps and Marsh Road (AM and PM peak hour): This intersection would no longer be impacted under the two near-term plus project scenarios (2018 and 2021) evaluated in the Draft EIR.
- U.S. 101 Southbound Ramps and Marsh Road (AM peak hour): This intersection would no longer be impacted under the near-term 2018 plus project scenario.
- Bayfront Expressway and Chrysler Drive (PM peak hour): This intersection would no longer be impacted under the near-term 2018 plus project scenario.
- Bayfront Expressway and Chilco Street (PM peak hour): This intersection would no longer be impacted under the near-term 2018 plus project scenario.

2.3.3 Updated Roadway Segment Analysis

The Draft EIR explains that the roadway segment analysis contained in the TIA used traffic counts from both the city's General Plan Circulation Update and the Commonwealth Corporate Center Project Draft EIR. During the 45-day public review period for the Menlo Park Small High School Project Draft EIR, the city commented traffic counts associated with the Commonwealth Corporate Center Project were outdated and requested the SUHSD update its roadway segment analysis with more recent traffic count data. The city also noted many of the the study roadway segments are proposed for reclassification to Mixed-Use Collectors under the General Plan Update.

Accordingly, the SUHSD has updated the TIA's roadway segment analysis by applying a growth factor to the Commonwealth Corporate Center Project data. The growth factor was derived by comparing average daily traffic (ADT) volumes from the Commonwealth Corporate Center Project Draft EIR to the ADT volumes from the City's General Plan Circulation Update. This growth factor was applied to the "old" counts to represent General Plan existing counts. In addition, the updated roadway segment analysis classifies all the study roadway segments as Mixed-Use Collectors. The results of the updated roadway segment analysis are summarized below and presented in full in Appendix J to this Final EIR.

Updated Roadway Segment Analysis Results

The updated roadway segment analysis does not substantially change the findings of the Draft EIR. The updated analysis did not identify any new or substantially more severe impacts than that identified in the Draft EIR. Rather, with the updated roadway segment analysis, the following adverse roadway segment impacts identified in the TIA and Draft EIR no longer occur:

- Jefferson Drive, south of Chrysler Drive: This roadway segment would no longer be impacted under the two near-term plus project (2018 and 2021) and cumulative plus project scenarios.
- Chrysler Drive, between Jefferson Drive and Constitution Drive: This roadway segment would no longer be impacted under the two near-term plus project scenarios.
- Independence Drive, north of Chrysler Drive: This roadway segment would no longer be impacted under the two near-term plus project and cumulative plus project scenarios.

2.3.4 Evaluation of Two Additional Intersections on Marsh Road

The Draft EIR evaluated the potential impacts from project-related traffic at 11 study intersections within the City of Menlo Park. The Draft EIR explains that the 11 intersections chosen for study were intersections in the immediate vicinity of the proposed Menlo Park Small High School site because the TIA prepared for the project conservatively assumed that all traffic associated with the proposed school would be new trips. This is considered a conservative assumption (i.e., likely to overestimate potential impacts) because the proposed project is not directly causing or contributing to enrollment growth. Rather, it would serve existing demand and alleviate projected increases in student enrollment occurring throughout the SUHSD. In other words, the proposed school would serve students that would attend a different SUHSD high school, such as Sequoia High School or Menlo-Atherton High School, if they did not attend the new Menlo Park Small High School. Given this, the majority of the trips generated by the proposed Menlo Park Small High School would be trips that are *diverted* from another destination (e.g., an SUHSD school, a parent work place, etc.) Accordingly, the TIA assumes these diverted trips would show up as new trips only at intersections off the normal direction of travel by a potential student, most likely the intersections in the immediate vicinity of the proposed school site. This approach avoids double counting trips on the roadway network.

During the 45-day public review period for the Menlo Park Small High School Project Draft EIR, San Mateo County requested the SUHSD update the TIA to evaluate potential impacts at the following intersections on Marsh Road because the TIA's trip distribution methodology assigned 25% of the proposed project's trips to Marsh Road:

- Marsh Road and Bay Road (City of Menlo Park intersection)
- Marsh Road and Middlefield Road (Town of Atherton intersection)

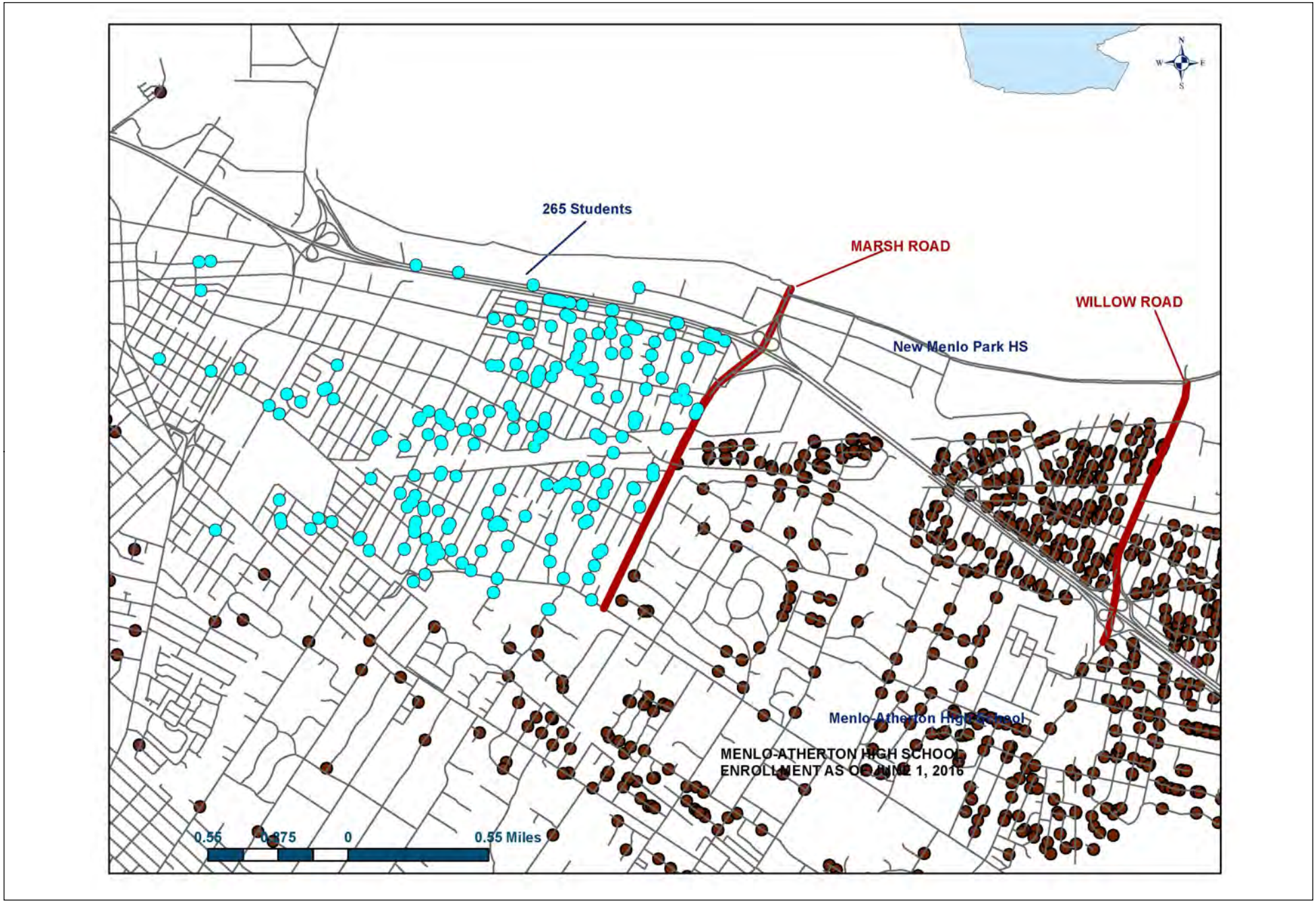
The SUHSD has updated the TIA to include an evaluation of LOS impacts at these two additional intersections. The results of the additional intersection analyses are summarized below and presented in full in Appendix J to this Final EIR.

Existing Student Trip Credit

The Marsh Road / Bay Road and Marsh Road / Middlefield Road intersections are located approximately 1.25 and 1.9 road miles from the proposed Menlo Park Small High School. In addition, Marsh Road is an arterial or collector roadway that connects major activity centers in Menlo Park, Atherton, and Redwood City. Since the two intersections are relatively far away

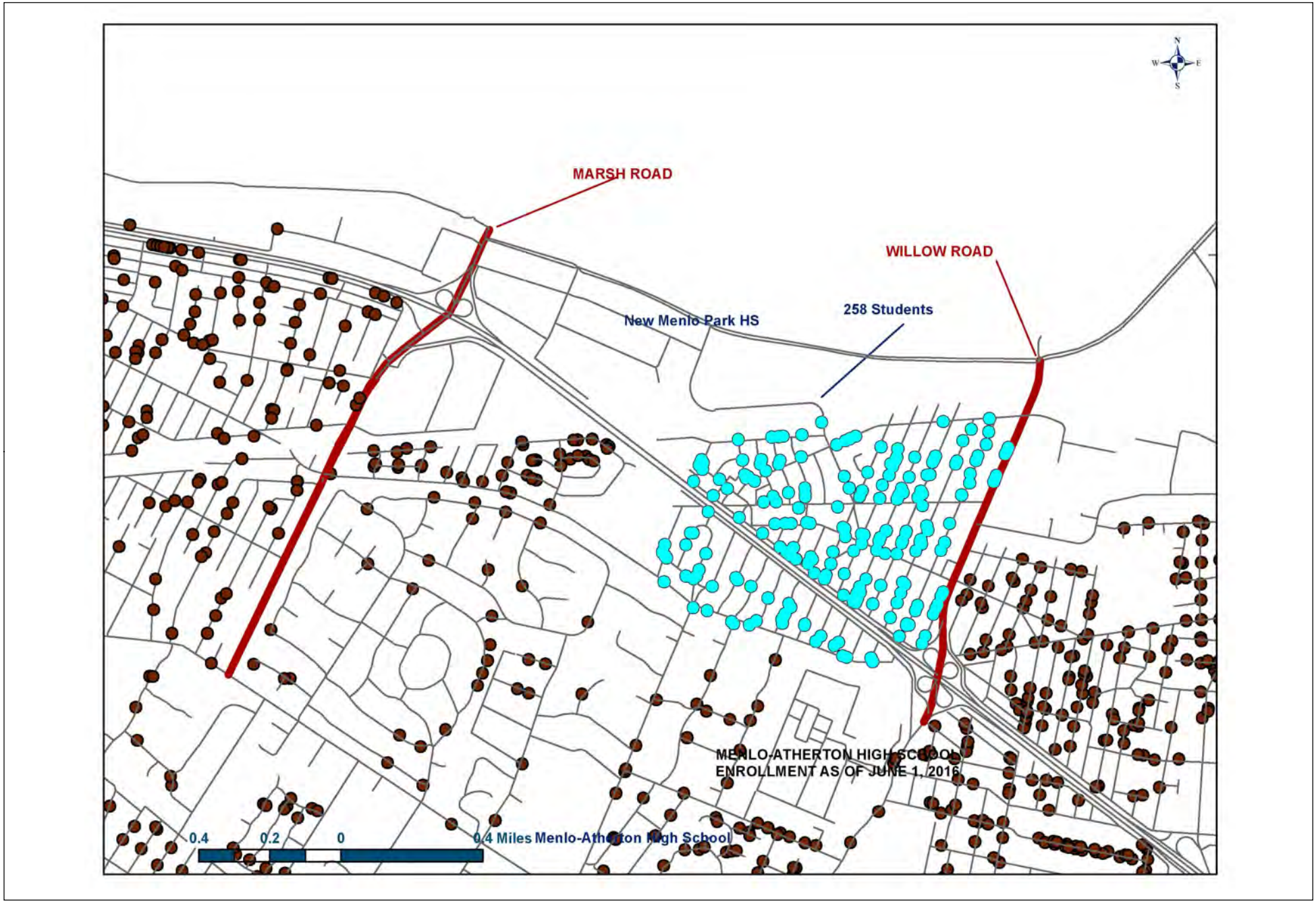
from the project site (all other study intersections are within 0.7 road miles of the proposed school), it is not appropriate to assume that all project-related trips that could pass through these intersections would be new trips. Such an assumption would result in double counting existing school trips already on the roadway network (and included in the existing traffic counts). Therefore, as part of the evaluation of these two additional intersections, 2016 student enrollment information from Menlo-Atherton High School (MAHS, located 555 Middlefield Road in Atherton) and Sequoia High School (SHS, located at 1201 Brewster Road in Redwood City) was examined to estimate how many of these school's existing students are currently driving through these intersections on their way to school. The enrollment information indicated the following:

- 265 students from the North Fair Oaks (unincorporated San Mateo County) and Friendly Acres (unincorporated San Mateo County and Redwood City) neighborhoods, which are areas generally located north of Marsh Road and east of Middlefield Road, currently attend MAHS (see Figure 2-1 in this Final EIR). The most likely travel route for these students from home to school is Marsh Road (west of U.S. 101) to Bay Road to Ringwood Avenue or Marsh Road (west of U.S. 101) to Middlefield Road. Thus, some students attending the Menlo Park Small High School from this area (particularly those that reside south of the Dumbarton Rail Corridor) would be diverted from these roadways onto Marsh Road (east of U.S. 101) and Independence Drive.
- 258 students from the Belle Haven neighborhood (in Menlo Park), which is generally located north of Willow Road, between the Dumbarton Rail Corridor and U.S. 101, currently attend MAHS (see Figure 2-2 in this Final EIR). The most likely route of travel for these students from home to school would involve travel on Willow Road to Middlefield Road or Willow Road to Bay Road to Ringwood Avenue. Thus, a student attending the Menlo Park Small High School from this area would be diverted from these roadways, most likely onto Chilco Street.
- 90 students from the Belle Haven neighborhood (in Menlo Park) as well as various neighborhoods in East Palo Alto currently attend SHS (see Figure 2-3 in this Final EIR). The most likely travel route for these students from home to school is Willow Road to Middlefield Road and into Redwood City, U.S. 101 to Marsh Road (west of U.S. 101) to Middlefield Road and into Redwood City, or U.S. 101 to Veterans Boulevard to Brewster Avenue and into Redwood City. Thus, a student attending the Menlo Park Small High School from these areas would be diverted from these roadways, most likely onto Bayshore Expressway or Chilco Street.



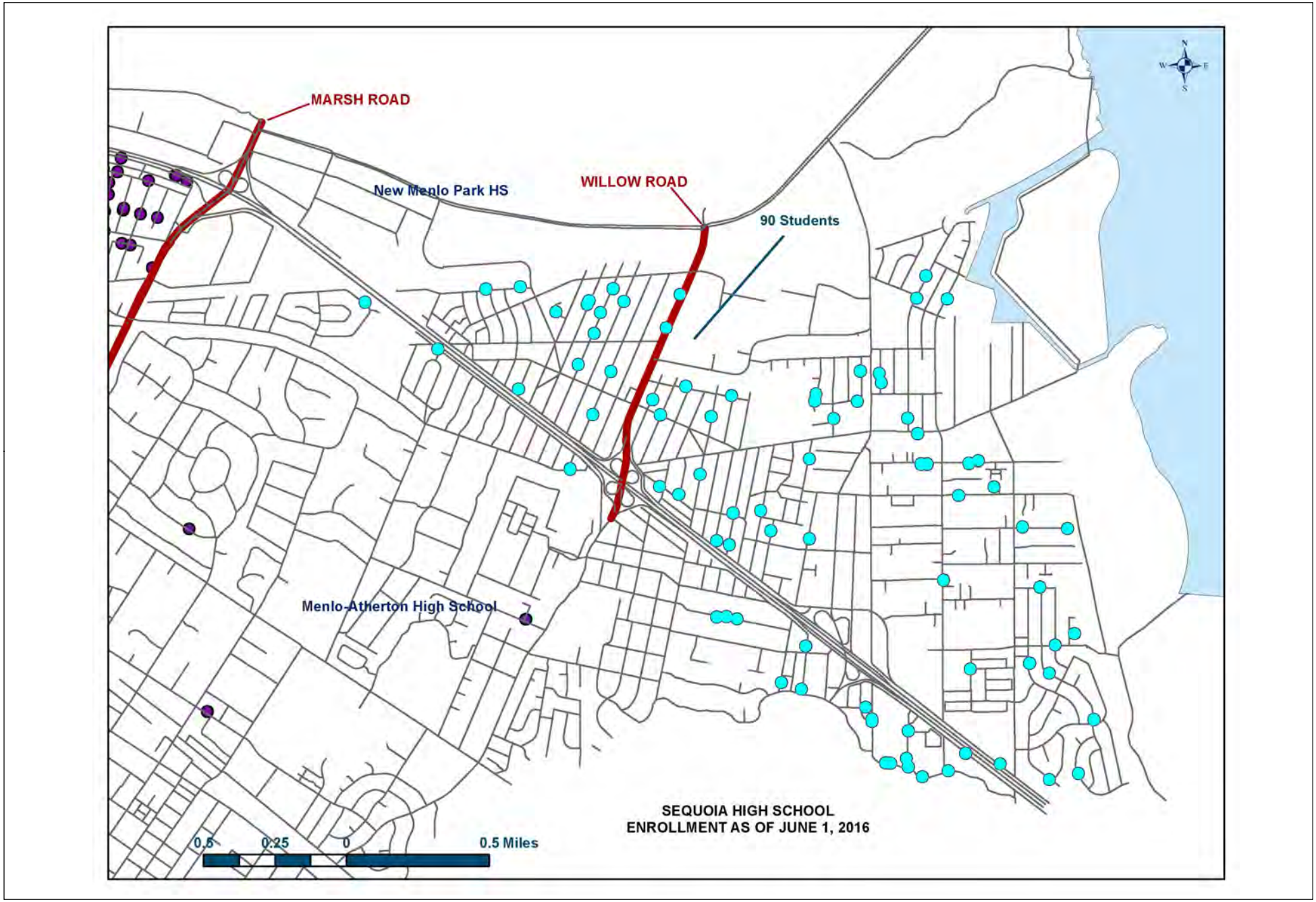
Source: SUHSD 2016; MIG|TRA 2016

Figure 2-1 MAHS Enrollment in North Fair Oaks / Friendly Acres



Source: SUHSD 2016; MIG|TRA 2016

Figure 2-2 MAHS Enrollment in Belle Haven



Source: SUHSD 2016; MIG|TRA 2016

Figure 2-3 SHS Enrollment in Belle Haven and East Palo Alto

Based on the above, the updated TIA assumes that 10% of the MAHS students that live in the North Fair Oaks and Friendly Acres neighborhoods would attend the Menlo Park Small High School. This represents approximately 27 students changing their path of travel to attend the proposed high school[2]. This trip credit (i.e., the diversion of existing vehicle trips) was applied only to the intersection of Marsh Road and Middlefield Road because most, if not all, existing student trips are likely to pass through this intersection. This is likely due to the fact that travel along Marsh Road to Middlefield Road to MAHS is slightly shorter (1.75 miles) than travel along Marsh Road to Bay Road to Ringwood Avenue to MAHS (2.0 miles), and also provides easier access to MAHS's main entrance on Oak Grove Avenue[3]. This credit was also only applied for AM peak hour inbound trip generation because these trips are originating from home, corresponding to the existing student information. Outbound trips and PM peak hour trips are less predictable and cannot be correlated to the existing student trip origin information since these trips usually have a second destination (AM outbound trips) or a different origin (PM peak hour trips).

A trip credit for MAHS students living in North Fair Oaks and Friendly Acres was not taken for the Marsh Road / Bay Road intersection (i.e., all project trips were assumed to be new trips at this intersection) because it was assumed these trips would pass through the Middlefield Road / Marsh Road intersection. Furthermore, a trip credit for SHS students living in the Belle Haven neighborhood and East Palo Alto was not taken in the updated TIA because it is uncertain whether students living in this area would use U.S. 101 or surface streets such as Middlefield Road. The SUHSD notes, however, that some trips originating in Belle Haven and East Palo Alto and ending at SHS are likely passing through the Marsh Road / Middlefield intersection.

Additional Intersection Analysis Results

The additional analysis of intersections on Marsh Road does not substantially change the findings of the Draft EIR. The updated analysis did not identify any new or substantially more severe impacts than that identified in the Draft EIR:

- With the addition of project traffic, both the Marsh Road / Bay Road and Marsh Road / Middlefield Road study intersections are projected to continue to operate at an acceptable LOS (LOS D or better – see Appendix J) during both peak hours under existing plus project conditions.
- With the addition of project traffic, the Marsh Road / Bay Road intersection would operate at acceptable LOS (LOS D or better – see Appendix J) during both peak hours under near term plus project conditions (2018 and 2021). The intersection of Marsh Road and Middlefield Road is projected to operate at unacceptable LOS F during both peak hours under near term plus project conditions (2018 and 2021); however, based on the

[2] The SUHSD notes the 10 percent value represents a reasonable estimate of the total students from this area that could attend the proposed Menlo Park Small High School. As noted in Section Trip and Parking Generation Counts2.3.1 of this Final EIR, approximately 47% of the students that attend Everest High School live within a two-mile radius of the school. The North Fair Oaks / Friendly Acres area occupies approximately 16.5 percent of the total land area, and approximately 29 percent of the total developable land area (not including San Francisco Bay), within a two mile radius of the proposed school. Thus, the North Fair Oaks / Friendly Acres area would be expected to contribute between 7.8 and 13.6 percent of the students that live within two miles of, and attend, the Menlo Park Small High School.

[3] Road distances are measured from the Marsh Road / Florence Road intersection, which is just east of the Dumbarton Rail Corridor.

applicable level of service impact criteria for the Town of Atherton, the addition of project traffic would not cause the intersection average control delay to increase by four seconds or more. Thus, the project would not result in a significant impact at this intersection under near term plus project conditions.

- With the addition of project traffic, the Marsh Road / Bay Road intersection would operate at acceptable LOS (LOS D or better) during both peak hours under cumulative plus project conditions. The intersection of Marsh Road and Middlefield Road is projected to operate at unacceptable LOS F during both peak hours under near term plus project conditions (2018 and 2021); however, based on the applicable level of service impact criteria for the Town of Atherton, the addition of project traffic would not cause the intersection average control delay to increase by four seconds or more. Thus, the project would not result in a significant impact at this intersection under cumulative plus project conditions.

2.4 CITY OF MENLO PARK CONNECTMENLO GENERAL PLAN UPDATE

The Draft EIR contained a very brief discussion of the City of Menlo Park's ConnectMenlo: General Plan Land Use and Circulation Elements and M-2 Area Zoning Update (General Plan Update; see Draft EIR section 1.1.3). This was because the city released the Draft EIR for the General Plan Update only five weeks before the SUHSD released the Menlo Park Small High School Project Draft EIR. The SUHSD is providing additional information on the General Plan Update that provides context for the setting of the proposed school, potential increases in student enrollment facing the SUHSD, and economic factors related to the city's General Plan Update.

2.4.1 2040 ConnectMenlo General Plan Update Buildout Projections

According to the General Plan Update Draft EIR, the city's proposed Land Use and Circulation Elements "would update the City's existing Land Use and Circulation Elements and are intended to guide development sustainability, mobility and connectivity in the city through the year 2040. These two elements are central components of the General Plan because they describe which land uses should be allowed in the city (City of Menlo Park 2016a, page 3-2)." The General Plan Update also proposes to change land use designations in the city's Bayfront Area. According to the General Plan Update Draft EIR (emphasis added), " . . . the Bayfront Area is the focus of future land use change and *all of the new development* potential proposed under [the General Plan] update would occur in this area (City of Menlo Park 2016a, page 3-5)".

This development potential is shown in Table 3-2, "Existing and Proposed 2040 Horizon Year Buildout Projections", of the General Plan Update Draft EIR. This table indicates the General Plan Update would result in an increase of 4.7 million square feet of non-residential office space, 850 hotel rooms, 5,430 residential units, 13,960 residents, and 20,150 employees – all within the Bayfront Area in which the SUHSD's proposed Menlo Park Small High School is located. Based on this, the city's General Plan Update Draft EIR, and related Fiscal Impact Analysis (see section 2.4.3 of this Final EIR), estimates the city's General Plan Update would result in between approximately 875 to 1,100 new students by 2040 that must be served by the SUHSD. Nearly all of these students (99%) would be associated with planned multi-family housing units within the city's Bayfront Area (City of Menlo Park 2016a, Table 4.12-12 and City of Menlo Park 2016b, page 70).

These students are not planned for by the SUHSD[4]; they would be in addition to near term increases in enrollment already identified by the SUHSD. Based on the buildout projections contained in the city's General Plan Update, Connect Menlo could add 36 and 46 students per year to the SUHSD if approved by the city. This equates to approximately 182 to 230 new residential units that must be served by the SUHSD between 2017 and 2040 – and this growth is just for the City of Menlo Park[5].

2.4.2 General Plan Travel Demand Model

The city's General Plan Update Draft EIR evaluates the potential traffic impacts of the General Plan Update buildout projections using a new Menlo Park City Travel Demand Model (MPM), which was developed specifically for the purposes of developing traffic forecasts for analysis of the General Plan Update.

The General Plan Update Draft EIR states, "The MPM is based on the latest C/CAG [City / County Association of Governments of San Mateo County] Model developed by the VTA [Santa Clara Valley Transportation Authority]. The most current version of the C/CAG Model, received on July 19, 2015, was still under development by VTA at that time. Three model years – namely, 2013, 2020, and 2040 – of the C/CAG model were obtained. The same land use data categories, modeling technical assumptions, time-of-day, and regional origin-destination travel patterns as in the current C/CAG Model were maintained in the MPM model to ensure consistency with the regional forecasts. The C/CAG model incorporates regional housing and jobs data and future-year forecasts for 2040 – derived from the VTA and MTC models – to ensure that the MPM takes into account the regional nature of travel patterns affecting Menlo Park. The MPM outputs were utilized to determine the net change in VMT and traffic volumes that would occur under each analysis scenario (City of Menlo Park 2016a, pg. 4.13-22)."

In regards to the General Plan Update MPM and C/CAG Model, as well as the General Plan Update Draft EIR's evaluation of traffic impacts, the SUHSD notes:

- 12 of the 13 intersections studied in the TIA prepared for the Menlo Park Small High School were evaluated in the General Plan Update Draft EIR (City of Menlo Park 2016a, Table 4.13-4) and are thus presumed to be part of the General Plan Update's MPM (the exception is the Constitution Drive / Independence Drive intersection).
- The city's General Plan Update specifically acknowledges the SUHSD is planning to construct the proposed Menlo Park Small High School Project[6].

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[4] The City's General Plan Update Draft EIR states, " SUHSD indicated that student projections do not take into account new students generated under the [General Plan Update]. The SUHSD indicated that the potential population increase under the [General Plan Update] would result in a need for new facilities to accommodate enrollment growth (City of Menlo Park 2016a, page 4.12-34)."

5 This estimate of residential units is based on the State of California's student generation rate of 0.2 students per residential unit, which is the rate used to evaluate environmental and economic impacts in the City's General Plan Update Draft EIR and Fiscal Impact Analysis.

6 The General Plan Update Draft EIR states, "In addition, a new high school is being proposed by the Sequoia Union High School District on Jefferson Drive within the Bayfront Area (City of Menlo Park 2016a, page 4.7-23) and "The SUHSD indicated that enrollment growth is steadily increasing and that there are current plans to build a small high school in Menlo Park to accommodate enrollment (City of Menlo Park 2016a, page 4.12-34).

- The C/CAG Model explicitly identifies a "home-based school: grade school, high school, and college trips" as one of six trip purposes used in the model for evaluating the impacts of land use and development on the transportation system (C/CAG 2011, 2013, 2015).

2.4.3 General Plan Update Fiscal Impact Analysis

On September 7, 2016 the City of Menlo Park released its ConnectMenlo Fiscal Impact Analysis (City of Menlo Park 2016b). This fiscal analysis presents findings regarding the potential fiscal impacts of the city's proposed General Plan Update. The Fiscal Impact Analysis evaluates the net increase in revenues and expenditures and resulting net fiscal impact of the General Plan Update for the city's General Fund, Menlo Park Fire Protection District, school districts that serve the project area, including the SUHSD, and other special districts serving the area.

As explained in the city's Fiscal Impact Analysis, ". . . there are two types of potential impacts that can arise from growth in households which in turn leads to an increase in student population. The first potential impact is related to the additional costs of instruction for new students, and how those costs will be covered. The second potential impact is if there is a need for additional facilities to accommodate more students . . . As student population has grown, it has created capacity constraints in the Ravenswood City and Sequoia Union School Districts. Both of these districts have embarked on planning efforts to meet future demand, and the Sequoia Union High School District has initiated a campus expansion project at the Menlo-Atherton campus, which serves Menlo Park. Current enrollment projects and associated expansion plans for these districts do not account for the growth that would be generated by the [General Plan Update] (City of Menlo Park 2016b, page 59)."

The City's ConnectMenlo Fiscal Impact Analysis concludes the General Plan Update would have a net negative fiscal impact for the SUHSD on the order of $4.1 to $5.5 million. This net negative fiscal impact is based on an average cost per student of $14,402 for fiscal year 2015/2016. In 2040, the increase in the cost of instruction associated with between 875 to 1,100 new students would be more than the increase in property tax revenues that would occur under the General Plan Update, creating the $4.1 to $5.5 million deficit identified in the city's Fiscal Impact Analysis, which equates to 3 to 4% of the SUHSD's 2015/2016 fiscal year budget. The net negative fiscal impact to the SUHSD identified in the city's Fiscal Impact Analysis does not include costs associated with acquisition and development land or the construction of facilities needed to accommodate additional students. Thus, the actual net negative fiscal impact to the SUHSD could be more than $4.1 to $5.5 million. For example, the SUHSD notes the costs to acquire the 2.1 acre parcel of land at 150 Jefferson Drive and design and construct the proposed Menlo Park Small High School (capable of accommodating 400 students) are currently approaching $35 million.

2.5 CITY OF MENLO PARK TRANSPORTATION IMPACT FEE PROGRAM

The Draft EIR includes a brief discussion of the City of Menlo Park's Transportation Impact Fee (TIF) Program (see Draft EIR page 4-25). The SUHSD is providing additional information on this program to provide context for the Draft EIR's discussion and evaluation of potential feasible traffic mitigation for the project.

2.5.1 City Municipal Code Chapter 13.26

The city's TIF Program is codified in Chapter 13.26 of the city's municipal code. As described in the city's General Plan Update Draft EIR: "The intent of the fee is to maintain adequate service levels as new development places a strain on existing roadway capacity. The TIFs ensure that

development pays a proportional fair share of the cost of transportation infrastructure deemed necessary and reasonably related to accommodating the impact of development in Menlo Park (City of Menlo Park 2016a, page 4.13-7)."

The TIF is applicable to new development in all land use categories identified in the city's zoning ordinance, any construction adding additional floor area to a lot with an existing building, new single-family and multifamily dwelling units, and changes of use from one land use category to a different land use category. The amount of the fee to be paid is set by the methodology in the TIF study as shown in Table 2-1.

Table 2-1 City of Menlo Park Transportation Impact Fee Schedule

Land Use	Unit	Fee Per Unit
Office	Square Feet	$4.63
Research and Development	Square Feet	$3.33
Manufacturing	Square Feet	$2.28
Warehousing	Square Feet	$1.00
Restaurant	Square Feet	$4.63
Retail	Square Feet	$4.63
Single Family	Units	$3,139.49
Multi Family	Units	$1,927.02
Hotel	Room	$1,833.73
Medical Office	Square Feet	$10.75
Other	PM Peak Hour Trips	$3,107.87

Source: City of Menlo Park 2016c

Per the city's municipal code, the city's transportation manager shall either: 1) Identify the appropriate land use category for any development not included in the list of TIF land uses, based on a similarity of use and peak hour trip characteristics of the use as indicated in the most recent version of the Institute of Transportation Engineers' Trip Generation Manual, or 2) calculate the fee based on the per trip fee in the TIF study, as modified from time to time.

The TIF is to be paid in full to the city of Menlo Park before a building permit is issued; however, the proposed project does not require a building permit from the city. Once collected, the city is required to deposit the fees in a special fund, the TIF fund, designated solely for transportation improvements. According to the City's General Plan Update Draft EIR, "TIF's may only be used for the building of new arterial streets, sidewalks, bicycle lanes, and other physical enhancements to the City's multi-modal transportation network. The adoption of the TIF ordinance does not require the City to construct all of the improvements in the plan. The mix of projects and the details related to each individual project can be modified and prioritized by the Council over time (City of Menlo Park 2016a, page 4.13-8)."

2.5.2 Relationship to ConnectMenlo General Plan Update

The city's General Plan Update Draft EIR identifies that the General Plan Update would result in significant and unavoidable impacts to roadway segments and increase peak hour delays at intersections from increased traffic. To mitigate this impact, the General Plan Update Draft EIR (Mitigation Measure TRANS-1B) requires the City to update its TIF program to guarantee

funding for roadway and infrastructure improvements and to prepare a "nexus" study that provides a basis for requiring development a fee pursuant to California Government Code section 66000 et. seq. and establishes the fee's reasonable relationship or nexus between the TIF improvement and the new development. The General Plan Update Draft EIR then provides several examples of improvement and facilities that would reduce impacts to acceptable levels of service standards and could be included in the TIF nexus study, including improvements to two intersections evaluated in the TIA prepared for the Menlo Park Small High School Project (Chilco Street / Constitution Drive and Chrysler Drive / Constitution Drive).

The General Plan Update Draft EIR concludes traffic associated with the General Plan Update would remain significant and unavoidable even with the TIF program mitigation because, while the city would secure a funding mechanism for future roadway and infrastructure improvements, it "cannot guarantee improvements at these intersections at this time. Additionally, several mitigation measures have potential secondary environmental impacts that will need to be addressed before construction could occur. This is in part because the nexus study has yet to be prepared and because some of the impacted intersections are under the jurisdiction of Caltrans or the City of East Palo Alto (City of Menlo Park 2016a, page 4.13-73).

2.5.3 Relationship to City of Menlo Park Capital Improvement Plan

The City of Menlo Park's 5-year Capital Improvement Plan (CIP) is the city's plan for short and long-range development, maintenance, improvement and acquisition of infrastructure assets to benefit the city's residents, businesses, property owners and visitors. The CIP provides a link between the city's planning documents and budget, as well as a means for planning, scheduling and implementing capital and comprehensive planning projects over the next 5 years. The city's TIF is one source of funding for CIP-identified projects.

The city's most recent CIP is the 2015-2020 5 Year CIP (City of Menlo Park 2016d). This most recent CIP identifies eight different project categories, including streets and sidewalk projects and traffic and transportation projects. The 2015-2020 CIP identifies two specific infrastructure projects that would benefit the roadway segments and intersections in the immediate vicinity of the proposed Menlo Park Small High School:

- *Chilco Street and Sidewalk Installation*: This project involves engineering design and construction of landscaping, sidewalks, and bicycle facility improvements along the portion of Chilco Street in the city's Belle Haven neighborhood. This project has received funding for design support only. Additional funding would be necessary for construction, which is not scheduled at this time.
- *Marsh Road and Bay Road Signal Modification*: This project will improve LOS and pedestrian safety at this intersection and upgrade non-standard traffic signal equipment. There is no funding allocated for this project in the CIP and the CIP does not identify a schedule for the completion this project.

The SUHSD notes that, in addition to infrastructure projects, the CIP identifies a number of planning and other transportation related projects throughout the city, such as adding bicycle lane and studying the use of city shuttle buses by school students, which could improve the efficiency of the city's transportation network.

2.6 GREENHOUSE GAS EMISSIONS ESTIMATES

Draft EIR section 3.3.4.3 explained that the proposed project would be less than the Bay Area Air Quality Management District's (BAAQMD) operational greenhouse gas (GHG) screening

size criteria for high school land uses and would therefore have a less than significant GHG impact. The SUHSD has quantified the proposed project's potential GHG emissions using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2) to further demonstrate the proposed project would have a less than significant GHG impact (see Appendix K). As a worst-case scenario, the model was set to estimate emissions in 2018 (the inaugural year), with the trip generation rates for 400 students extrapolated from the TIA (a 400-person school is not anticipated until 2021). Despite this worst-case scenario, the modeling showed that the proposed project would generate 572 metric tons of carbon dioxide equivalents ($MTCO_2e$) per year during operation, which is substantially below the 1,100 $MTCO_2e$ operational threshold established by the BAAQMD.

2.7 CHANGES TO MITIGATION MEASURES

In response to comments received on the Draft EIR, the District has clarified and amplified several mitigation measures related to trip reduction and parking. These revisions include:

- Mitigation Measures TRA-1A, TRA-1B, and TRA-1C have been revised to clarify and amplify the timing and type of trip reduction measures incorporated into the project.
- Mitigation Measures TRA-2B, and TRA-2C have been revised to clarify and amplify requirements related to reducing potential conflicts between pedestrians, bicyclists, and vehicles.
- Mitigation Measures TRA-3A, TRA-3B, and TRA-3C have been revised to clarify and amplify the parking limitations and control measures incorporated into the project.

In addition, the District has incorporated two additional mitigation measures into the project to reduce the project's potential traffic impacts:

- Mitigation Measure TRA-1D incorporates requirements to provide bus service for students attending the Menlo Park Small High School.
- Mitigation Measure TRA-1E incorporates requirements to consult and negotiate with the City of Menlo Park on a voluntary payment for the purposes of mitigating the proposed project's potential traffic impacts.

These changes to mitigation measures are shown in Chapter 3, Errata and Revisions.

2.8 REFERENCES

City / County Association of Governments of San Mateo County (C/CAG) 2011. *San Mateo County Congestion Management Program 2011.* San Mateo, CA. November 2011.

_____2013. *San Mateo County Congestion Management Program 2013.* San Mateo, CA. November 2013.

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City of Menlo Park 2016a. *ConnectMenlo: General Plan Land Use & Circulation Elements and M-2 Zoning Update Public Review Draft EIR*. Menlo Park, CA . June 1, 2016.

_____2016b. *ConnectMenlo Fiscal Impact Analysis.* Menlo Park, CA. September 7, 2016.

_____2016c. *Transportation Impact Fee City of Menlo Park.* Menlo Park, CA. n.d. <https://www.menlopark.org/DocumentCenter/Home/View/304>

_____2016d. *2015-2020 5-Year CIP*. Menlo Park, CA. n.d.

Hexagon Transportation Consultants (Hexagon) 2016. *Supplemental Traffic Analysis for the Proposed Menlo Park Small High School at 150 Jefferson Drive*. Gilroy, CA. September 13, 2016.

LPA, Inc. 2016. *Menlo Small High School Additional Bike Parking.* July 18, 2016.

Sequoia Union High School District (SUHSD) 2016. *Parking and Enrollment Response.* Redwood City, CA. April 2016.

CHAPTER 3 ERRATA AND REVISIONS

This chapter provides amended text and graphics for the Menlo Park Small High School Project Draft EIR. Text revisions are organized by Draft EIR chapter. Additions to the Draft EIR text are shown with underlining and text removed from the Draft EIR is shown with ~~strikethrough~~.

3.1 EIR SUMMARY

On page S-2, section S.2.2, the description of the proposed school's start time has been revised as follows:

> The proposed high school would operate on a traditional schedule. From approximately August or early September through June, classes would be in session from about ~~8:15 or~~ 8:30 AM or 8:45 AM to 3:30 or 3:45 PM. Approximately 35 ~~F~~faculty and staff would arrive prior to the start of classroom instruction, and some after school and evening programs (clubs, parent meetings, etc.) would also occur at the school. Thus, the SUHSD anticipates the site would typically be in use by school faculty, students, and staff from approximately 7 AM to 6 PM Monday through Friday.

On page S-4 to S-6, Mitigation Measures TRA-1A, TRA-1B, and TRA-1C have been revised as follows:

> *Mitigation Measure TRA-1A: Prepare and Implement a Travel Demand Management Program for Menlo Park Small High School Students, Faculty, and Staff*
>
> Prior to the start of the 2018-2019 school year,~~By the 2021-2022 school year~~, the Menlo Park Small High School shall prepare and implement a formal, written Travel Demand Management (TDM) Program for the Menlo Park Small High School.
>
> The TDM Program shall cover ~~that covers~~ school students, faculty, and staff, and shall set as its minimum performance standard a 35 percent mode split for combined student, faculty, and staff walking, bicycling, carpools, transit, and other non-single occupancy vehicle travel modes. The minimum performance standard for the school shall increase to 45 percent by the time the school reaches full enrollment in the 2021-2022 school year.
>
> As part of its program, the school shall designate a central TDM coordinator to oversee the TDM Program and monitor the program's effectiveness. ~~The school shall, at a minimum, evaluate the following TDM measures for inclusion in its written TDM Program:~~ The TDM Program shall be tailored to the school's students, faculty, and staff based on the results the travel mode survey required by Mitigation Measure TRA-1B, and shall consider and account for the starting point, travel distance, and transportation modes available to school's students, faculty, and staff (e.g., not all students may have a bicycle or live near a transit stop).
>
> As of October 2016, school demographics that would enable a tailored TDM Program are not available. Accordingly, the Menlo Park Small High School shall initiate its TDM Program with the following measures:
>
> - ~~On-site vehicle parking permits (either free or fee-based)~~
> - ~~Preferential and/or free/reduced cost parking for carpools~~
> - A pledge or commitment that shall be included in the school's student handbook and which shall promote and encourage students to seek safe, non-single occupancy vehicle travel school commute modes

- A commitment to provide student parking limits and controls in accordance with Mitigation Measures TRA-3A and TRA-3B
- A commitment to provide student bus transportation and evaluate the expansion of this service in accordance with Mitigation Measures TRA-1D
- Adequate, secure bicycle parking and a provision to add bicycle racks as demand increases
- Provide information (e.g., schedules, rates and fares) about Caltrain, SamTrans, and other relevant transit services (e.g., Marsh Road Shuttle) that could provide an alternative means of transportation to school
- Organized school-wide walk and bike to school day, week, etc.
- Promotions and activities to incentivize alternative modes of transportation (e.g., competitions to see which grade level avoids the most vehicle trips)
- Use of a web- or mobile-based application to connect students wishing to carpool
- ~~Use of incentives such as prizes and certificates for students who participate in walk / bike to school programs~~
- Notice / awareness of TDM measures in ~~the~~ school media materials (e.g., website, newsletter, etc.)
- Distribution to students and staff on at least an annual basis of information about other local and regional TDM programs such as, but not limited to, the City of Menlo Park shuttle services and the San Mateo County Transportation Demand Management Agency's Peninsula Traffic Congestion Relief Alliance Program.
- ~~Other measures deemed feasible and appropriate for the school, such as a late start time for the school~~

The effectiveness of the school's TDM Program shall be determined by using the annual travel mode survey required by Mitigation Measure TRA-1B. If this survey indicates the TDM performance standard is not being met, the Menlo Park Small High School shall identify, evaluate, and incorporate additional measures into its TDM Program. These measures may include, but are not limited to:

- Scheduled late start days (i.e., days on which classes commence later than the times identified in section 2.1 of the Final EIR dated October 6, 2016)
- A permanent late school start time (no later than 9:00 AM)
- A commitment to provide transit / shuttle service in accordance with Mitigation Measure TRA-1C
- Other measures deemed feasible by the school and which reduce single-occupancy vehicle trips such that the TDM Program performance standard is and continues to be met, as verified by the annual travel mode survey required by Mitigation Measure TRA-1B.

The TDM Program and its performance standard shall apply each year the school is in operation, and the school shall strive to continually improve the success of the program.

~~The TDM Program shall set as its goal a 30 percent mode split for combined student, faculty, and staff transit, pedestrian, bicycle, and carpool trips. The central TDM coordinator shall be responsible for surveying school students, faculty, and staff once each year (preferably in the first quarter) to ascertain the most current transportation mode split at the school and the effectiveness of the TDM Program (in accordance with Mitigation Measure TRA-1B).~~

Mitigation Measure TRA-1B: Conduct Menlo Park Small High School Travel Mode Survey to Tailor and Evaluate the Effectiveness of the School's TDM Program

Beginning with the school's inaugural freshman class, anticipated to start studies in the 2018-2019 school year~~2021-2022 school year~~, the Menlo Park Small High School shall contract with a qualified transportation planning firm to conduct a student, faculty, and staff travel survey. The survey shall be updated periodically as deemed necessary by the District's contracted transportation planning firm. School staff shall administer the ~~updated~~ survey once per year over a minimum two-day period. The survey shall focus on student, faculty, and staff travel modes, vehicle occupancies, ~~and~~ time of travel to school in the morning and from school in the afternoon, and/or other information recommended by the transportation planning firm. The survey results shall be tabulated to assess current trip generation by mode, time-of-day, ~~and~~ grade or faculty/staff level, and/or other information recommended by the transportation planning firm. The school shall use ~~and used~~the results of the annual survey to tailor the school's TDM program and ~~to ascertain the~~ evaluate its effectiveness ~~of the school's Travel Demand Management Program~~ in accordance with Mitigation Measure TRA-1A.

Mitigation Measure TRA-1C: Evaluate the feasibility of ~~SamTrans bus / shuttle~~Transit ~~s~~Service

The District shall evaluate the feasibility of establishing ~~a dedicated SamTrans bus route or shuttle~~ transit (bus or shuttle) service for the Menlo Park Small High School.

- By July 1, 2017~~December 31, 2019~~, the SUHSD shall re-initiate contact with SamTrans and the City of Menlo Park regarding dedicated bus or shuttle service for the Menlo Park Small High School. As part of this initial contact, the SUHSD shall engage SamTrans and the City to assess opportunities for a public-private partnership in which private shuttle buses are shared for school commute purposes.
- By January 31, 2018D~~ecember 31, 2020~~, the SUHSD shall, in coordination with the SamTrans and/or the City of Menlo Park, complete an evaluation of the technical, economic, and demographic factors that affect the feasibility of dedicated ~~SamTrans~~ bus or shuttle service for the Menlo Park Small High School. The evaluation may be completed by the SUHSD's Transportation Department or by an SUHSD-designated consultant with expertise in transit planning and operations. The SUHSD shall not be held responsible for delays outside of its control that affect the completion of this evaluation (e.g., the SUHSD has not received information from other agencies that is needed to complete the evaluation).
- If the SUHSD, in coordination with ~~and~~ SamTrans and/or the City of Menlo Park, determines that dedicated bus or shuttle service is feasible, the SUHSD shall initiate the service as soon as possible, ~~with the goal to provide service by~~ but no later than the start of the ~~2021-2022~~ 2019-2020 school year.
- If it is determined that such service is not feasible because there is insufficient or overly dispersed ridership such that service would be prohibitively expensive (as determined by the SUHSD, SamTrans, and/or the City of Menlo Park), disruptive to other transit lines or ridership, or logistically infeasible (e.g., too long of a commute time), the evaluation shall consider if, when, and how the obstacles that make such service infeasible could be addressed and should be re-evaluated (e.g.,

student enrollment is too low and needs to be higher, there is insufficient student density along potential bus routes, etc.). The SUHSD shall re-evaluate the feasibility of transit service at appropriate intervals, with intent to initiate service as soon as possible after it is determined such service is feasible.

- If it is determined that such service is feasible, the SUHSD shall coordinate with SamTrans and the City and evaluate the opportunity for providing reduced or subsidized transit fares as a means to promote and increase ridership.

On page S-6 of the Draft EIR, Mitigation Measures TRA-1D and TRA-1E have been added to the EIR:

Mitigation Measure TRA-1D: Provide School Bus Service to the Menlo Park Small High School

The District shall provide bus service to and from the Menlo Park Small High School as follows:

- School bus service shall be in place in time for the 2018-2019 school year and there shall be capacity to transport 25 students to and from school. The actual ridership level will depend on student demographics; however, the District shall make every effort to maximize student ridership.
- The school's TDM Program shall include an evaluation of whether there it is feasible and appropriate to expand bus service as school enrollment increases and changes. Factors that affect whether such expansion of service would be considered feasible would include student demographics, existing ridership levels, compliance with TDM performance standards, and costs associated with additional bus service.

Mitigation Measure TRA-1E: Consult with the City of Menlo Park on a Voluntary Payment to the City's Transportation Impact Fee (TIF) Program

Prior to the start of the 2018-2019 school year, the District shall consult with the City of Menlo Park to:

- Negotiate a reasonable and proportionate voluntary payment to the City's TIF Program. The voluntary payment shall consider and take into appropriate account the uncertainty associated with whether such a voluntary payment to the City or another agency to improve transportation-related infrastructure would substantially lessen the project's impacts and be implemented in a reasonable timeframe. The voluntary payment shall also consider the trip reduction benefits associated with Mitigation Measures TRA 1A, TRA-1B, TRA-1C, and TRA-1D. The SUHSD shall work with the City to identify the schedule for the voluntary payment of the project's TIF.
- As part of the negotiation, the SUHSD and the City shall consider whether it is preferable to substitute SUHSD staff time and participation in any City-sponsored transportation planning or travel demand management programs in-lieu of cash payment.

On pages S-6 to S-7 of the Draft EIR, Mitigation Measures TRA-2B, and TRA-2C have been revised as follows:

Mitigation Measure TRA-2B: Reduce Potential Off-Campus Student Loading and Unloading

The Menlo Park Small High School shall prepare and implement a formal, written policy outlining student loading and unloading procedures for the school. The policy shall:

- Describe the student loading and unloading areas at the school
- Contain a map depicting student loading and unloading areas
- ~~Explicitly describe that~~Prohibit off-campus student loading and unloading at adjacent businesses and on adjacent roadways ~~is admonished and discouraged by the school~~

The school shall distribute this policy to each incoming freshman and sophomore at the beginning of the school year (the policy ~~may~~shall be included in the Student Handbook), and shall also publish the policy in school newsletters and/or other materials at least once a year. As part of this policy, school staff shall, upon receipt of a complaint regarding off-campus student loading and unloading, ~~strive~~use appropriate efforts to identify and dissuade the individual responsible for the off-campus loading or unloading from repeating their activity.

Mitigation Measure TRA-2C: Participate in City of Menlo Park's Bayfront Transportation Management Association

The SUHSD shall coordinate with appropriate stakeholders (such as the City of Menlo Park, SamTrans, and local businesses) if and when the City of Menlo Park establishes its Bayfront Transportation Management Association (TMA) to assess and recommend changes to signage, pedestrian facilities, and other solutions that would address pedestrian and bicycle safety concerns, improve safe routes to schools, and improve traffic circulation in the Bayfront Area. The SUHSD shall update the school's Safe Routes to School Map as new traffic circulation patterns or infrastructure are recommended and implemented by the TMA.

On pages S-7 to S-8 of the Draft EIR, Mitigation Measures TRA-3A, TRA-3B, and TRA-3C have been revised as follows:

Mitigation Measure TRA-3A: ~~Maximize On-Site Parking~~Limit and Control On-Site Student Parking

The ~~SUHSD~~Menlo Park Small High School shall limit and control on-site student parking by requiring students to obtain a parking pass to park on-site. Parking passes may be free or fee-based. The number of passes available to students shall be based on the final design of the project, and shall be equal to the total number of permanent parking spaces on-site, less the number of faculty and staff assigned to the school. The number of passes may be increased if the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B indicates an excess of faculty and staff parking spaces. ~~maximize on-site parking at the Menlo Park Small High School site. This may be accomplished by designing the eastern perimeter of the site to accommodate daily parking for students/staff or short-term parking for visitors (outside of school drop-off and pick-up periods).~~

Mitigation Measure TRA-3B: ~~Identify~~Designate, Limit, and Control Off-Campus Parking ~~Areas~~

To reduce the potential indirect effects associated with students searching for off-campus parking, ~~T~~the Menlo Park Small High School shall, by December 1, 2020:

- Identify and designate off-campus parking areas for students. Such areas could be identified by ~~engage~~ engaging the city, local businesses, and other land uses in the Bayfront Area to identify underutilized or vacant parking areas that could be used by school staff and/or students during times when school is in session.
- The amount of off-campus student parking to be provided shall be sufficient to make up for the difference between student demand for parking and the number of on-site student parking spaces. The amount of off-campus student parking necessary for the school may be determined by the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B.
- Once sufficient off-campus parking areas have been identified, the school shall prepare and implement a formal, written off-campus parking policy identifying ~~outlining~~where and when students (and staff, if necessary) may ~~areas where staff and students can~~ find available off-campus parking. The policy shall ~~discourage~~prohibit parking in areas where the school has not reached an agreement~~s and/or understanding~~ with the appropriate entity owning or controlling the parking. ~~The school shall also publish the location of off-campus parking areas in school newsletters and/or other materials at least once a year.~~
- The Menlo Park Small High School shall limit and control parking on designated off-campus areas by requiring students to obtain a pass to park in designated off-campus parking areas. Parking passes may be free or fee-based.
- If sufficient off-campus parking areas cannot be identified, the Menlo Park Small High School shall incorporate additional measures into the school's TDM Program in accordance with Mitigation Measure TRA-1A until off-site parking demand matches the available off-site parking supply the school has obtained.

Mitigation Measure TRA-3C: Coordinate with the City on Parking Prohibitions

The Menlo Park Small High School shall coordinate with the City of Menlo Park on parking prohibitions on Jefferson Drive. The ~~goal~~purpose of this coordination shall be to evaluate whether it is feasible to permit temporary, short-term, school-related parking that can be used for visitors, parent-teacher conferences, etc. in a manner that is consistent with the city's goals.

3.2 PROJECT DESCRIPTION (DRAFT EIR CHAPTER 2)

On page 2-8 of the Draft EIR, the description of the proposed school operations in section 2.2.3 has been revised as follows:

> The proposed high school would operate on a traditional schedule. From approximately August or early September through June, classes would be in session from about ~~8:15 or~~ 8:30 or 8:45 AM to 3:30 or 3:45 PM.

On page 2-12 of the Draft EIR, in section 2.3.2, Circulation and Parking, the following text describing the schematic design of bicycle parking has been revised:

> The ~~schematic design plans~~proposed site layout calls for ~~show 50~~ 58 permanent parking stalls lining the southern and western portions of the property (including two Americans with Disabilities Act accessible stalls). The SUHSD may also provide nine short-term, temporary parking spaces in the on-site student loading and unloading lane, but this

would be subject to review by the Menlo Park Fire Protection District. The SUHSD would provide ~~a minimum of 20 racked bicycle parking spaces and 3 bicycle lockers.~~ 60 bicycle parking spaces – 30 spaces would be located on the northern side of the campus, within 200 feet of the main entrance, and 30 bicycle parking spaces would be located inside the gated area on the eastern side of the campus.

On page 2-12 of the Draft EIR, the text describing fire access in section 2.3.2.1 has been revised as follows:

> The SUHSD has met with the City of Menlo Park Fire Marshall and has designed the project to comply with the 2013 California Fire Code. The SUHSD has provided fire and emergency access to the interior and back site via a paved, 26-foot-wide drive aisle located around the perimeter of the site that includes a 44-foot radius turn and a ladder truck staging area to reach building areas more than 30 feet above the ground. The schematic design also calls for upgrading one fire hydrant on Jefferson Drive and the installation of two new fire hydrants on-site. The SUHSD would continue to coordinate with the ~~City of~~ Menlo Park Fire Protection District~~Department~~ on fire access and emergency response issues.

3.3 IMPACT ANALYSIS METHODOLOGY (DRAFT EIR CHAPTER 3)

On page 3-5 of the Draft EIR, the last sentence in section 3.3.3.3, Impact Discussion, has been revised as follows:

> For these reasons, potential geologic-, seismic-, and soils related impacts from implementation of the proposed project are not discussed further in this EIR.

3.4 TRANSPORTATION (DRAFT EIR CHAPTER 4)

On page 4-4 of the Draft EIR, the description of Bayfront Expressway (SR 84) has been revised as follows:

> Bayfront Expressway (SR 84) is a divided State Highway that connects the East Bay region with Menlo Park via the Dumbarton Bridge, and with Highway 1 and the community of San Gregorio via Woodside and La Honda. Near Menlo Park, Bayfront Expressway is a north-south oriented expressway with three lanes in each direction and has a posted speed limit that ranges from 45 to 50 mph. At its closest point, ~~U.S. 101~~Bayfront Expressway is approximately 475 feet ~~southwest~~northeast of the proposed school site . . .

On page 4-4 of the Draft EIR, the description of Constitution Drive has been revised as follows:

> Constitution Drive is an east-west, two-lane collector street that runs from Independence Drive to Chilco Drive and has a posted speed limit of 35 mph. It is a local roadway between Independence Drive and Chrysler Drive.

On page 4-8 of the Draft EIR, the discussion of parking under section 4.1.6 has been revised as follows:

> The SUHSD would provide ~~50~~58 permanent on-site parking spaces, including two Americans with Disabilities Act spaces. On-site parking would be provided along the ~~northern~~southern and western drive aisles via 90-degree parking stalls. The SUHSD would also coordinate with the Menlo Park Fire Protection District to allow short-term, temporary parking in the school's student loading and unloading lane (providing

temporary parking in this lane may require a slight redesign of the width of sidewalks, parking stalls, and/or the perimeter drive aisle to ensure sufficient space is provide for emergency fire access). There is currently approximately 2,400 linear feet of off-street parking provided on Jefferson Drive; however, off-site parking in the vicinity of the proposed Menlo Park Small High School is limited. In January 2016, the Menlo Park City Council approved a no parking zone along most of Constitution Drive and parts of Chrysler Drive. In addition, the City is considered adopting a no parking zone on Jefferson Drive as part of its General Plan update (City of Menlo Park 2016b).

On page 4-10 of the Draft EIR, the first sentence at the top of the page has been revised as follows:

The ~~2013~~ 2015 CMP, which was developed to be consistent with Metropolitan Transportation Commission's Transportation 2035 Plan, provides updated program information and performance monitoring results for the CMP roadway system

On pages 4-10 to 4-11 of the Draft EIR, the discussion of the scope of the TIA in section 4.3.1 and Table 4-1 have been revised as follows:

The scope of the TIA, i.e., the intersections and roadway facilities evaluated for potential traffic impacts, was prepared in consultation with the City of Menlo Park. In total, the TIA evaluated the potential traffic impacts from implementation of the Menlo Park Small High School Project on ~~11~~ 13 intersections, 6 roadway segments, 3 CMP roadway segments, and 1 freeway interchange. All of facilities evaluated are located within the City of Menlo Park or the Town of Atherton, but not necessarily under the jurisdiction of the City (e.g., freeway interchanges are subject to Caltrans jurisdiction). The study facilities are shown in Figure 4-1 and listed in Table 4-1 to Table 4-4.

Table 4-1 Intersections Evaluated in the Project TIA Report

Study Intersection	Primary Jurisdiction	Intersection Type
1. Bayfront Expressway and Marsh Road	Caltrans / C/CAG	Signalized
2. Constitution Drive and Independence Drive	Menlo Park	2-Way Stop
3. U.S. 101 NB Ramps and Marsh Road	Caltrans	Signalized
4. U.S. 101 SB Ramps and Marsh Road	Caltrans	Signalized
5. Bayfront Expressway and Chrysler Drive	Caltrans / C/CAG	Signalized
6. Constitution Drive and Chrysler Drive	Menlo Park	4-Way Stop
7. Jefferson Drive and Chrysler Drive	Menlo Park	1-Way Stop
8. Independence Drive and Chrysler Drive	Menlo Park	1-Way Stop
9. Constitution Drive and Jefferson Drive	Menlo Park	1-Way Stop
10. Bayfront Expressway and Chilco Street	Caltrans / C/CAG	Signalized
11. Constitution Drive and Chilco Street	Menlo Park	4-Way Stop
12. Bay Road and Marsh Road	Menlo Park	Signalized
13. Middlefield Road and Marsh Road	Town of Atherton	Signalized

Source: Hexagon 2016 and 2016a (see Appendix C, Figure 1 and Table 5 and Appendix J, Table S1-1)

On page 4-12 of the Draft EIR, section 4.3.1.1, Level of Service, has been revised as follows:

> Consistent with the City's Transportation Impact Analysis Guidelines, study intersections (including CMP and state facilities) were evaluated using the VISTRO software and analysis model. Additionally, for consistency with the methodology applied in the intersection analysis for the City's General Plan, the intersection analysis is based on the *Highway Capacity Manual* (HCM) ~~2000~~ 2010 methodology. The ~~HCM2000~~ HCM2010 operations method evaluates signalized intersection operations on the basis of average control delay time for all vehicles at the intersection. The ~~HCM2000~~ HCM2010 operations method for unsignalized intersections is applicable for both two-way and all-way stop-controlled intersections. For the analysis of stop-controlled intersections, the ~~HCM2000~~ HCM2010 methodology evaluates intersection operations on the basis of average control delay time for all vehicles on the stop-controlled approaches.

On page 4-12 of the Draft EIR, footnote nine has been revised as follows:

> ITE trip generation rates represent a national average and do not include site-specific data or regional characteristics.

On page 4-15 of the Draft EIR, the third paragraph under section 4.3.4.1 and Table 4-8 have been revised as follows:

> The TIA found that all but one of the study intersections operate at acceptable LOS under existing conditions as shown in Table 4-8.

Table 4-8 Existing Conditions – Intersection Level of Service

Study Intersection	Jurisdiction	Unacceptable LOS?(A)	
		AM	PM
1. Bayfront Expressway and Marsh Road(B)	C/CAG / State	**Yes**	**Yes**
2. Constitution Drive and Independence Drive	Menlo Park	No	No
3. U.S. 101 NB Ramps and Marsh Road	State	No	No
4. U.S. 101 SB Ramps and Marsh Road	State	No	No
5. Bayfront Expressway and Chrysler Drive	State	No	No
6. Constitution Drive and Chrysler Drive	Menlo Park	No	No
7. Jefferson Drive and Chrysler Drive	Menlo Park	No	No
8. Independence Drive and Chrysler Drive	Menlo Park	No	No
9. Constitution Drive and Jefferson Drive	Menlo Park	No	No
10. Bayfront Expressway and Chilco Street	State	No	No
11. Constitution Drive and Chilco Street	Menlo Park	No	No
12. Bay Road and Marsh Road	Menlo Park	No	No
13. Middlefield Road and Marsh Road	Atherton	No	No

Source: Hexagon 2016 and 2016a (see Appendix C, Table 6 and Appendix J, Table S1-1)

(A) Bold values indicate the intersection operates at an unacceptable LOS based on applicable LOS policy. Refer to section 4.4.1 for a description of the LOS thresholds at study intersections. The AM, and PM peak hour periods are from 7 AM to 9 AM, and 4 PM to 6 PM, respectively.

(B) CMP intersection.

On page 4-17 of the Draft EIR, the discussion of 2018 near term conditions and Table 4-10 have been revised as follows:

Near Term Conditions 2018

The TIA found ~~all 11~~ 12 of the 13 study intersections would operate at an unacceptable LOS during the AM and/or PM peak hour under near term 2018 conditions, as shown in Table 4-10.

Table 4-10 Near Term 2018 Conditions – Intersection Level of Service

Study Intersection	Jurisdiction	Unacceptable LOS?(A)	
		AM	PM
1. Bayfront Expressway and Marsh Road(B)	C/CAG / State	**Yes**	**Yes**
2. Constitution Drive and Independence Drive	Menlo Park	**Yes**	No
3. U.S. 101 NB Ramps and Marsh Road	State	**Yes**	**Yes**
4. U.S. 101 SB Ramps and Marsh Road	State	**Yes**	**Yes**
5. Bayfront Expressway and Chrysler Drive	State	**Yes**	**Yes**
6. Constitution Drive and Chrysler Drive	Menlo Park	**Yes**	**Yes**
7. Jefferson Drive and Chrysler Drive	Menlo Park	No	**Yes**
8. Independence Drive and Chrysler Drive	Menlo Park	No	**Yes**
9. Constitution Drive and Jefferson Drive	Menlo Park	No	**Yes**
10. Bayfront Expressway and Chilco Street	State	**Yes**	**Yes**
11. Constitution Drive and Chilco Street	Menlo Park	**Yes**	**Yes**
12. Bay Road and Marsh Road	Menlo Park	No	No
13. Middlefield Road and Marsh Road	Atherton	**Yes**	**Yes**

Source: Hexagon 2016 and 2016a (see Appendix C, Table 17 and Appendix J, Table S1-2)

(A) Bold values indicate the intersection operates at an unacceptable LOS based on applicable LOS policy. Refer to section 4.4.1 for a description of the LOS thresholds at study intersections. The AM, and PM peak hour periods are from 7 AM to 9 AM, and 4 PM to 6 PM, respectively.

(B) CMP intersection.

On pages 4-17 to 4-18 of the Draft EIR, the discussion of 2021 near term conditions and Tables 4-11 and 4-12 have been revised as follows:

Near Term Conditions 2021

Similar to the 2018 scenario, the TIA found ~~all 11~~ 12 of the 13 study intersections would operate at an unacceptable LOS during the AM and/or PM peak hour under near term 2021 conditions, as shown in Table 4-11.

Table 4-11 Near Term 2021 Conditions – Intersection Level of Service

Study Intersection	Jurisdiction	Unacceptable LOS?(A)	
		AM	PM
1. Bayfront Expressway and Marsh Road(B)	C/CAG / State	**Yes**	**Yes**
2. Constitution Drive and Independence Drive	Menlo Park	**Yes**	No
3. U.S. 101 NB Ramps and Marsh Road	State	**Yes**	**Yes**
4. U.S. 101 SB Ramps and Marsh Road	State	**Yes**	**Yes**

Table 4-11 Near Term 2021 Conditions – Intersection Level of Service			
Study Intersection	**Jurisdiction**	**Unacceptable LOS?(A)**	
		AM	**PM**
5. Bayfront Expressway and Chrysler Drive	State	**Yes**	**Yes**
6. Constitution Drive and Chrysler Drive	Menlo Park	**Yes**	**Yes**
7. Jefferson Drive and Chrysler Drive	Menlo Park	No	**Yes**
8. Independence Drive and Chrysler Drive	Menlo Park	No	**Yes**
9. Constitution Drive and Jefferson Drive	Menlo Park	No	**Yes**
10. Bayfront Expressway and Chilco Street	State	**Yes**	**Yes**
11. Constitution Drive and Chilco Street	Menlo Park	**Yes**	**Yes**
12. Bay Road and Marsh Road	Menlo Park	No	No
13. Middlefield Road and Marsh Road	Atherton	**Yes**	**Yes**
Source: Hexagon 2016 and 2016a (see Appendix C, Table 17 and Appendix J, Table S1-2)			
(C) (A) Bold values indicate the intersection operates at an unacceptable LOS based on applicable LOS policy. Refer to section 4.4.1 for a description of the LOS thresholds at study intersections. The AM, and PM peak hour periods are from 7 AM to 9 AM, and 4 PM to 6 PM, respectively.			
(D) (B) CMP intersection.			

For roadway segments, the TIA found four of the six study roadway segments would carry traffic volumes above their classified capacity under near term ~~2018~~ 2021 conditions, as shown in Table 4-12.

Table 4-12 Near Term ~~2018~~ 2021 Conditions – Roadway Segments (Average Daily Traffic)			
Roadway Segment	**Classification**	**Roadway Volume(A)**	
		Capacity	**2021**
1. Jefferson Drive, south of Chrysler Drive	Local	1,500	**~~2,330~~ 2,575**
2. Chrysler Drive, between Jefferson Drive and Constitution Drive	Local	1,500	**8,370**
3. Chrysler Drive, between Constitution Drive and Bayfront Expressway	Collector	10,000	**13,670**
4. Independence Drive, north of Chrysler Drive	Local	1,500	**~~5,740~~ 5,934**
5. Constitution Drive, between Jefferson Drive and Chilco Street	Collector	10,000	5,410
6. Chilco Street, between Constitution Drive and Bayfront Expressway	Collector	10,000	8,990
Source: Hexagon 2016 and 2016a (see Appendix C, Table 18 and Appendix J, Table S2)			
(A) Bold values indicated existing average daily traffic volume exceeds planned capacity.			

On page 4-20, the following information on thresholds of significance for intersections has been added to the Draft EIR:

Town of Atherton Intersection Level of Service Standard and Impact Criteria

The Town of Atherton does not have an adopted LOS standard or intersection impact criteria. For this reason, LOS standards and impact criteria utilized for other recent traffic

studies in the Town of Atherton were used to evaluate potential intersection impacts. A project is considered to have a potentially "significant" traffic impact if the addition of project traffic:

- Causes an intersection operating at LOS A through D to operate at an unacceptable level (LOS E or F); or
- If the intersection is operating at unacceptable LOS E or F and the addition of project traffic causes the intersection average control delay to increase by 4 seconds or more.

On pages 4-22 to 4-24 of the Draft EIR, the discussion under Impact TRA-1 and Tables 4-13 and 4-14 have been revised as follows:

Impact TRA-1: The Menlo Park Small High School Project would add peak hour and daily trips to the circulation and transportation system in the vicinity of the school site.

As shown in Table 4-5 and Table 4-6 the implementation of the Menlo Park Small High School Project would add up to 56 AM peak hour trips and 19 PM peak hour trips to the roadway system during its initial year of operation, when enrollment would be approximately 100 students (anticipated to be the 2018-2019 school year), and up to 322 AM peak hour trips and 174 PM peak hour trips to the roadway system at full enrollment (400 students during the 2021-22 school year). The TIA prepared for the project identifies that the addition of these trips would result in potentially significant impacts to ~~11~~12 of the 13 study intersections (from unacceptable LOS), four roadway segments (from increased traffic that exceeds roadway capacity), one route of regional significance (from an increase in roadway volume to capacity), and two freeway interchanges (from the addition of traffic to an on-ramp already operating at a substandard level) under existing plus project and near-term plus project conditions (2018 and 2021). These impacts are summarized in Table 4-13 to Table 4-16 below. The TIA prepared for the project identifies and recommends several traditional and alternative transportation infrastructure improvements to reduce the project's contribution to potentially significant transportation system impacts (see Appendix C, Table 25). These include:

- Installation of traffic signals at:
  - Constitution Drive and Chrysler Drive (study intersection 6)
  - Jefferson Drive and Chrysler Drive (study intersection 7)
  - Constitution Drive and Chilco Street (study intersection 11)
- Re-striping of existing traffic lanes at:
  - Bayfront Expressway and Marsh Road (study intersection 1)
  - Constitution Drive and Chrysler Drive (study intersection 6)
- Restricting left-turn movements at:
  - Constitution Drive and Independence Drive (study intersection 24)
- Widening roads and travel lanes to increase capacity on:
  - Bayfront Expressway and Marsh Road (study intersection 1)
  - U.S. 101 North/Southbound Ramps and Marsh Road (study intersections 3 and4)
  - Bayfront Expressway and Chrysler Drive (study intersection 5)
  - Constitution Drive and Chrysler Drive (study intersection 6)
  - Independence Drive and Chrysler Drive (study intersection 8)
  - Constitution Drive and Jefferson Drive (study intersection 9)

- Bayfront Expressway and Chilco Street (study intersection 10)
- Constitution Drive and Chilco Street (study intersection 11)
- U.S. 101 and Bayfront Expressway (regional route of significance)

- Providing an increased meter rate at U.S. 101 freeway ramps at Marsh Road
- Addition of Class III bicycle routes on Constitution Drive
- Extension / addition of pedestrian sidewalks on all or parts of:
  - Jefferson Drive, Chrysler Drive, Constitution Drive and Chilco Street
- Providing bus service to the proposed school

Table 4-13 Summary of Project Impacts – Unacceptable Intersection Level of Service

Scenario / Study Intersection[A]	Jurisdiction	Unacceptable LOS?[B]	
		AM	PM
Existing Plus Project Conditions			
1. Bayfront Expressway and Marsh Road	CMP / State	**Yes**~~(B)~~	**Yes**~~(B)~~
2. Constitution Drive and Independence Drive	Menlo Park	**Yes**	No
3. U.S. 101 NB Ramps and Marsh Road	State	No	**Yes**(B)
4. U.S. 101 SB Ramps and Marsh Road	State	**Yes**~~(B)~~	No
11. Constitution Drive and Chilco Street	Menlo Park	No	**Yes**~~(B)~~
Near-Term Plus Project Conditions (2018)			
1. Bayfront Expressway and Marsh Road	CMP / State	**Yes**~~(B)~~	Yes~~(B)~~
2. Constitution Drive and Independence Drive	Menlo Park	**Yes**~~(B)~~	No
3. U.S. 101 NB Ramps and Marsh Road	State	**Yes**~~(B)~~	**Yes**~~(B)~~
4. U.S. 101 SB Ramps and Marsh Road	State	**Yes**~~(B)~~	Yes~~(B)~~
5. Bayfront Expressway and Chrysler Drive	State	No	**Yes**~~(B)~~
6. Constitution Drive and Chrysler Drive	Menlo Park	**Yes**~~(B)~~	**Yes**~~(B)~~
7. Jefferson Drive and Chrysler Drive	Menlo Park	No	**Yes**~~(B)~~
10. Bayfront Expressway and Chilco Street	State	Yes~~(B)~~	**Yes**~~(B)~~
11. Constitution Drive and Chilco Street	Menlo Park	**Yes**~~(B)~~	**Yes**~~(B)~~
13. Middlefield Road and Marsh Road	Atherton	Yes~~(B)~~	Yes~~(B)~~
Near-Term Plus Project Conditions (2021)			
1. Bayfront Expressway and Marsh Road~~(B)~~	CMP / State	**Yes**~~(B)~~	**Yes**~~(B)~~
2. Constitution Drive and Independence Drive	Menlo Park	**Yes**~~(B)~~	No
3. U.S.-101 NB Ramps and Marsh Road	State	**Yes**~~(B)~~	**Yes**~~(B)~~
4. U.S.-101 SB Ramps and Marsh Road	State	**Yes**~~(B)~~	**Yes**~~(B)~~
5. Bayfront Expressway and Chrysler Drive	State	No	**Yes**~~(B)~~
6. Constitution Drive and Chrysler Drive	Menlo Park	**Yes**~~(B)~~	**Yes**~~(B)~~
7. Jefferson Drive and Chrysler Drive	Menlo Park	No	**Yes**~~(B)~~
8. Independence Drive and Chrysler Drive	Menlo Park	No	**Yes**~~(B)~~
9. Constitution Drive and Jefferson Drive	Menlo Park	No	**Yes**~~(B)~~
10. Bayfront Expressway and Chilco Street	State	Yes~~(B)~~	**Yes**~~(B)~~

Table 4-13 Summary of Project Impacts – Unacceptable Intersection Level of Service			
Scenario / Study Intersection(A)	**Jurisdiction**	**Unacceptable LOS?(B)**	
		AM	**PM**
11. Constitution Drive and Chilco Street	Menlo Park	**Yes~~(B)~~**	**Yes~~(B)~~**
13. Middlefield Road and Marsh Road	Atherton	Yes~~(B)~~	Yes~~(B)~~

Source: Hexagon 2016 and 2016a (see Appendix C, Tables 16, 22 and Table 23 and Appendix J, Tables S1-1 and S1-2)

(A) This table summarizes the project's contribution to unacceptable LOS impacts identified in the project TIA (Appendix C to this EIR). Intersections that are not potentially significantly impacted are not included in this table. For example, study intersections 5 to 10 are omitted from the Existing Plus Project summary because the TIA does not identify potentially significant impacts at these intersections from project implementation.

(B) A "No" indicates the intersection would operate at an acceptable LOS with and without project traffic. An unbolded "Yes" indicates the intersection would operate at an unacceptable LOS with and without project traffic, but the project would not contribute significantly to this condition. A bold "Yes" indicates the project contributes to a potentially significant impact because the addition of project-related traffic would cause an intersection to exceed the applicable intersection impact criteria listed in Section 4.4.1.1 (e.g., degrade an intersection from an acceptable to an unacceptable LOS or add traffic that exceeds other applicable standards, such as a volume to capacity threshold).

~~(C) This intersection would operate at an unacceptable LOS without the addition of project traffic to the peak hour time period.~~

Table 4-14 Summary of Project Impacts - Increased Traffic on Roadway Segments (ADT)			
Scenario / Study Roadway Segment	**Road Class**	**Road Volume**	
		No Project (A)	**Plus Project(B)**
Existing Plus Project Conditions			
1. Jefferson Drive, south of Chrysler Drive	Local	1,290	**1,678**
2. Chrysler Drive, between Jefferson Drive and Constitution Drive	Local	**3,300**	**3,650**
3. Chrysler Drive, between Constitution Drive and Bayfront Expressway	Collector	4,000	4,311
4. Independence Drive, north of Chrysler Drive	Local	1,020	1,059
5. Constitution Drive, between Jefferson Drive and Chilco Street	Collector	2,400	2,460
6. Chilco Street, between Constitution Drive and Bayfront Expressway	Collector	7,000	7,028
Near-Term Plus Project Conditions (2021)			
~~7.~~ 1. Jefferson Drive, south of Chrysler Drive	Local	**~~2,330~~ 2,575**	**~~2,718~~ 2,963**
~~8.~~ 2. Chrysler Drive, between Jefferson Drive and Constitution Drive	Local	**8,370**	**8,720**
~~9.~~ 3. Chrysler Drive, between Constitution Drive and Bayfront Expressway	Collector	**13,670**	**13,981**

Table 4-14 Summary of Project Impacts - Increased Traffic on Roadway Segments (ADT)			
Scenario / Study Roadway Segment	**Road Class**	**Road Volume**	
		No Project (A)	**Plus Project(B)**
~~10.~~4.Independence Drive, north of Chrysler Drive	Local	~~**5,740**~~ **5,934**	~~**5,779**~~ **5,973**
~~11.~~5.Constitution Drive, between Jefferson Drive and Chilco Street	Collector	5,410	5,470
~~12~~.6.Chilco Street, between Constitution Drive and Bayfront Expressway	Collector	8,990	9,018
Source: Hexagon 2016 and 2016a (see Appendix C, Table 13 and Table 26 and Appendix J, Table S2) (A) A bold value indicates the roadway volume exceeds the road class capacity listed in Table 4-9. (B) A bold value indicates the project would contribute to a potentially significant impact because the addition of project-related traffic would exceed road segment impact criteria listed in Section 4.4.1.2.			

On pages 4-25 to 4-26 of the Draft EIR, the discussion pertaining to the feasibility of mitigation measures has been revised as follows:

> As explained in the TIA, the recommended improvements would have varying degrees of feasibility and effectiveness (see Appendix C, Table 25). The TIA acknowledges some recommended improvements that could reduce potential impacts to a less than significant level are infeasible because they would require right-of-way acquisition, encroachment to private property, utility relocation, roadway widening, and/or improvements above and beyond what is expected of any single project. ~~But~~While, in general, the TIA considers infrastructure improvements that do not require roadway widening to be potentially feasible measures that could be undertaken by the City or other appropriate agency, such as installing traffic signals, re-striping or converting existing travel lanes, and adding bike lanes where none currently exist, the TIA acknowledges such measures would be subject to additional planning, investigation, and discretion that is outside the control of the SUHSD. Therefore, the TIA concludes that the impacts of project traffic on intersection LOS would remain significant and unavoidable. As explained in the TIA, nearly all of the infrastructure improvements recommended for the proposed project have been recommended for other projects in the immediate vicinity, such as the Facebook Campus project, the Menlo Gateway Project, and Commonwealth Corporate Center project. The exception is improvements to the Bayfront Expressway / Chrysler Drive intersection (add a third east bound left turn lane), the Independence Drive / Chrysler Drive intersection (re-striping to provide turn lanes), and the ~~intersection of~~ Constitution Drive / ~~and~~ Jefferson Drive intersection (add a separate northbound turn lane), which are specific to the proposed Menlo Park Small High School Project ~~(the TIA recommends a separate northbound turn lane onto Constitution Drive at this intersection)~~.
>
> The TIA notes that the District does not have the jurisdiction or authority to implement improvements for the local and state intersections and roadways potentially affected by traffic stemming from the proposed project. As such, the TIA recommends the District work with the appropriate jurisdictional entity (e.g., the City of Menlo Park) to implement these potentially feasible improvements and contribute a fair share of the cost of the improvement. The City's ~~Traffic~~Transportation Impact Fee Program is intended to help fund transportation improvements in the City. Fees are based on the amount of PM

peak hour vehicle trips generated by a particular land use and are collected prior to the issuance of a building permit, which the proposed project does not require. For example, an office land use is charged $4.63 per trip per square foot, whereas a single family residential land use is charged $3,139.49 per trip per unit. School land uses do not have a pre-defined fee and could be charged as much as $3,107.87 per PM peak hour trip. Based on the net increase in PM peak hour vehicle trips that could result from the project (19 to 174 trips, see Table 4-5 and 4-6~~**Error! Reference source not found.)**~~, potential fees for the project could range from approximately $59,000 to $541,000, although the City has discretion to lower fees for certain facilities and the improvements that reduce transportation impacts (City of Menlo Park 2016c).

The District, as CEQA Lead Agency, has reviewed this TIA recommendation and considered whether the District's voluntary negotiation of fees to offset potential traffic impacts constitutes a feasible mitigation measure for the proposed project. ~~and has determined that contributing a fair share of the cost for improvements for traffic signals, re-striping, reconfiguring, or re-converting exiting travel lanes, widening roads and travel lands, and developing alternative transportation infrastructure is inappropriate and infeasible for the following reasons:~~ In its review, the District considered the following factors:

- Whether a voluntary payment to improve transportation-related infrastructure would substantially lessen the project's potential traffic impacts. As shown in Tables 4-10, 4-11, and 4-12, many of the intersections and roadway segments evaluated in the TIA already operate at unacceptable LOS without the project. In its discussion of potential mitigation measures under near term 2018 and 2021 conditions, the TIA notes that, even if the recommended infrastructure improvements were feasible, they would not improve intersection operations to acceptable LOS levels at 5 of the 11 intersections impacted by project traffic (study intersections 1, 3, 6, 9 and 11).
- Whether a voluntary payment to improve transportation-related infrastructure would successfully and substantially lessen the project's traffic impacts in a reasonable period of time. The SUHSD notes there is considerable uncertainty regarding whether a voluntary payment would improve transportation-related infrastructure in a reasonable period of time, which, for the purposes of this EIR, the SUHSD considers to be the year 2024 (the cumulative plus project condition year evaluated by the TIA). While a voluntary payment to the City pursuant to its Transportation Impact Fee Program would, at some point in time, be used to fund an improvement, somewhere in the City, the SUHSD notes that the City's 2015-2020 5 Year Capital Improvement Plan does not identify any specific, fully funded projects that would improve LOS operations to acceptable conditions at intersection impacted by the proposed project. Furthermore, the City's ConnectMenlo General Plan Update Draft EIR has concluded that the City's Transportation Impact Fee Program would not mitigate potential traffic impacts associated with the General Plan Update because the City cannot guarantee improvements would occur.
- ~~Students would come to the Menlo Park Small High School from feeder and other SUHSD high schools throughout the SUHSD attendance boundary. The increase in student enrollment forecast to occur within the SUHSD is in large part due to increased enrollment in these feeder schools. Thus, to some extent, some or many of the vehicle trips that would be generated by the proposed project are not new vehicle trips, but rather existing trips that are shifted from one school and vicinity to another.~~

~~These trips may already be impacting the regional intersections and roadway segments evaluated in the TIA~~.

- ~~The residential land uses where the school-related vehicle trips originate may have already been subject to a developer or traffic impact fee program intended to address transportation impacts. For example, new residential units in Menlo Park would have already been subject to a fee of $3,139.49 per unit.~~
- ~~The District cannot act as the primary authority to guarantee the timely and successful implementation, effectiveness, and monitoring of any infrastructure improvement funded through a cost-sharing program.~~

For these reasons, there is considerable uncertainty regarding whether or not a voluntary payment to the City or another agency to improve transportation-related infrastructure would: substantially lessen the project's impacts and be proportional to the project's impacts. But while such uncertainty is important to consider and factor into the calculation of what is an appropriate voluntary payment, it does not necessarily mean such a payment is infeasible. Given the City's TIF Program, General Plan Update, and Capital Improvement Program it is reasonable to assume that a voluntary payment to the City would improvement transportation infrastructure at one or more facilities impacted by the project by or before 2024. ~~funding roadway improvements, even on a cost-sharing basis, is not considered to be an effective mitigation measure for potential impacts identified in the TIA. Rather,~~

The SUHSD notes that voluntary participation in the City's TIF Program would need to consider the following factors in determining the appropriate funding contribution for the project:

- The degree to which there is a reasonable relationship between the proposed project and a voluntary payment to improve transportation-related infrastructure. In considering this, the SUHSD notes the proposed project does not cause enrollment growth in the SUHSD; rather, regional development has led to enrollment growth that the SUHSD is and will continue to be obligated to accommodate. For example, the City's General Plan update proposes to add more than 5,000 residential units to the City, which would generate between approximately 875 and 1,100 new SUHSD students (as well as approximately 14,000 residents and 20,000 employees). These new residential projects would be subject to the City's Transportation Impact Fee Program, and the transportation model used by the C/CAG and Menlo Park in its evaluation of General Plan Update traffic impacts assigns vehicle trips to the roadway system for the purpose of a "home-based school" trip. Thus, in the future, the impacts of vehicle trips from students that reside in the City's Bayfront Area and choose to attend the proposed Menlo Park Small High School would have been evaluated, and mitigated, as a residential development under the City's General Plan Update.
- The degree in which a voluntary payment to improve transportation-related infrastructure is roughly proportional to the impacts of the proposed project. While the TIF Program is intended to ensure a project pays its fair share, the SUHSD notes infrastructure improvements, once implemented, are permanent, and there is some uncertainty regarding how to apportion costs for a permanent solution to the proposed project, given the following:
  - The proposed Menlo Park Small High School is anticipated to be in session from approximately 8:30 or 8:45 AM to 3:45 PM. The 3:45 PM end of school day is outside the traditional PM peak hour time period (4 PM to 6 PM). Even though

the SUHSD has conservatively assumed that all project traffic would occur during the PM peak hour period, this is unlikely to be the case, and would need to be accounted for in any calculation of the project's fair share payment for infrastructure projects.

- The proposed Menlo Park Small High School is anticipated to operate on a traditional schedule, and would therefore generate the most traffic on weekdays from approximately mid to late August to early June. The school would generate minimal traffic on weekends, and less traffic during the summer sessions. In addition, late starts, early-outs, and other routine school activities (after school programs) and operations (e.g., teacher in-service days) would lead to regular fluctuations in peak hour traffic generated by the school, which would need to be accounted for in any calculation of the project's fair share payment for infrastructure projects.

- The trip reduction benefits associated with Mitigation Measures TRA-1A, TRA-1B, TRA-1C, and TRA-1D. The SUHSD notes that it is commonly accepted that providing additional roadway capacity and infrastructure may induce vehicle demand on the transportation system leading to other secondary impacts (e.g., additional air emissions, noise, etc.). In addition, providing infrastructure does not directly address the root cause of the impact (a new vehicle trip). Thus, measures that provide for the direct control and reduction of vehicle trips, such as the Travel Demand Management Program required by Mitigation Measure TRA-1A below, may be more effective at improving intersection operations, particularly if a plan for limiting vehicle trips is implemented from the start of the project.

By paying the TIF, the City considers a project to have contributed its fair share to mitigating the project's impacts to the citywide transportation system; however, the City's ConnectMenlo General Plan Update Draft EIR has concluded that the TIF Program would not mitigate potential traffic impacts associated with the General Plan Update because the City cannot guarantee improvements would occur. Thus, there is no guarantee that payment of the TIF would improve all facilities impacted by the project to a less than significant level. ~~District considers attempts to directly control and reduce vehicle trips generated by the proposed project to be a more effective and feasible mitigation measure than traffic signals or other roadway improvements.~~ Accordingly, to reduce the ~~vehicle trips generated by~~ potential traffic impacts resulting from the proposed Menlo Park Small High School Project, the SUHSD shall implement Mitigation Measures TRA-1A, TRA-1B, ~~and~~ TRA-1C, TRA-1D, and TRA-1E below.

On pages 4-26 to 4-28 of the Draft EIR, Mitigation Measures TRA-1A, TRA-1B, and TRA-1C have been revised, and Mitigation Measures TRA-1D and TRA-1E have been added, as follows:

Mitigation Measure TRA-1A: Prepare and Implement a Travel Demand Management Program for Menlo Park Small High School Students, Faculty, and Staff

Prior to the start of the 2018-2019 school year, ~~By the 2021-2022 school year~~, the Menlo Park Small High school shall prepare and implement a formal, written Travel Demand Management (TDM) Program for the Menlo Park Small High School.

The TDM Program shall cover ~~that covers~~ school students, faculty, and staff, and shall set as its minimum performance standard a 35 percent mode split for combined student, faculty, and staff walking, bicycling, carpools, transit, and other non-single occupancy

vehicle travel modes. The minimum performance standard for the school shall increase to 45 percent by the time the school reaches full enrollment in the 2021-2022 school year.

As part of its program, the school shall designate a central TDM coordinator to oversee the TDM Program and monitor the program's effectiveness. ~~The school shall, at a minimum, evaluate the following TDM measures for inclusion in its written TDM Program:~~ The TDM Program shall be tailored to the school's students, faculty, and staff based on the results the travel mode survey required by Mitigation Measure TRA-1B, and shall consider and account for the starting point, travel distance, and transportation modes available to school's students, faculty, and staff (e.g., not all students may have a bicycle or live near a transit stop).

As of October 1, 2016 school demographics that would enable a tailored TDM Program are not available. Accordingly, the Menlo Park Small High School shall initiate its TDM Program with the following measures:

- ~~On-site vehicle parking permits (either free or fee-based)~~
- ~~Preferential and/or free/reduced cost parking for carpools~~
- A pledge or commitment that shall be included in the school's student handbook and which shall promote and encourage students to seek safe, non-single occupancy vehicle travel school commute modes
- A commitment to provide student parking limits and controls in accordance with Mitigation Measures TRA-3A and TRA-3B
- A commitment to provide student bus transportation and evaluate the expansion of this service in accordance with Mitigation Measure TRA-1D
- Adequate, secure bicycle parking and a provision to add bicycle racks as demand increases
- Provide information (e.g., schedules, rates and fares) about Caltrain, SamTrans, and other relevant transit services (e.g., Marsh Road Shuttle) that could provide an alternative means of transportation to school
- Organized school-wide walk and bike to school day, week, etc.
- Promotions and activities to incentivize alternative modes of transportation (e.g., competitions to see which grade level avoids the most vehicle trips)
- Use of a web- or mobile-based application to connect students wishing to carpool
- ~~Use of incentives such as prizes and certificates for students who participate in walk / bike to school programs~~
- Notice / awareness of TDM measures in ~~the~~ school media materials (e.g., website, newsletter, etc.)
- Distribution to students and staff on at least an annual basis of information about other local and regional TDM programs such as, but not limited to, the City of Menlo Park shuttle services and the San Mateo County Transportation Demand Management Agency's Peninsula Traffic Congestion Relief Alliance Program
- ~~Other measures deemed feasible and appropriate for the school, such as a late start time for the school~~

The effectiveness of the school's TDM Program shall be determined by using the annual travel mode survey required by Mitigation Measure TRA-1B. If this survey indicates the TDM performance standard is not being met, the Menlo Park Small High School shall

identify, evaluate, and incorporate additional measures into its TDM Program. These measures may include, but are not limited to:

- Schedule late start days (i.e., days on which classes commence later than the times identified in section 2.1 of the Final EIR dated October 6, 2016)
- A permanent late school start time (no later than 9:00)
- A commitment to provide transit / shuttle service in accordance with Mitigation Measure TRA-1C
- Other measures deemed feasible by the school and which reduce single-occupancy vehicle trips such that the TDM Program performance standard is and continues to be met, as verified by the annual travel mode survey required by Mitigation Measure TRA-1B.

The TDM Program and its performance standard shall apply each year the school is in operation, and the school shall strive to continually improve the success of the program.

~~The TDM Program shall set as its goal a 30 percent mode split for combined student, faculty, and staff transit, pedestrian, bicycle, and carpool trips. The central TDM coordinator shall be responsible for surveying school students, faculty, and staff once each year (preferably in the first quarter) to ascertain the most current transportation mode split at the school and the effectiveness of the TDM Program (in accordance with Mitigation Measure TRA-1B).~~

Mitigation Measure TRA-1B: Conduct Menlo Park Small High School Travel Mode Survey to Tailor and Evaluate the Effectiveness of the School's TDM Program

Beginning with the school's inaugural freshman class, anticipated to start studies in the 2018-2019 school year~~2021-2022 school year~~, the Menlo Park Small High School shall contract with a qualified transportation planning firm to conduct a student, faculty, and staff travel survey. The survey shall be updated periodically as deemed necessary by the District's contracted transportation planning firm. School staff shall administer the ~~updated~~ survey once per year over a minimum two-day period. The survey shall focus on student, faculty, and staff travel modes, vehicle occupancies, ~~and~~ time of travel to school in the morning and from school in the afternoon, and/or other information recommended by the qualified transportation planning firm. The survey results shall be tabulated to assess current trip generation by mode, time-of-day, ~~and~~ grade or faculty/staff level, and/or other information recommended by the transportation planning firm. The school shall use ~~and used~~the results of the annual survey to tailor the school's TDM program and ~~to ascertain the~~ evaluate its effectiveness ~~of the school's Travel Demand Management Program~~ in accordance with Mitigation Measure TRA-1A.

Mitigation Measure TRA-1C: Evaluate the feasibility of ~~SamTrans bus / shuttle~~Transit ~~s~~Service

The District shall evaluate the feasibility of establishing ~~a dedicated SamTrans bus route or shuttle~~ transit (bus or shuttle) service for the Menlo Park Small High School.

- By July 1, 2017~~December 31, 2019~~, the SUHSD shall re-initiate contact with SamTrans and the City of Menlo Park regarding dedicated bus or shuttle service for the Menlo Park Small High School. As part of this initial contact, the SUHSD shall engage the Sam Trans and the City to assess opportunities for a public

private partnership in which private shuttle buses are shared for school commute purposes.

- By January 31, 2018D~~ecember 31, 2020~~, the SUHSD shall, in coordination with the SamTrans and/or the City of Menlo Park, complete an evaluation of the technical, economic, and demographic factors that affect the feasibility of dedicated ~~SamTrans~~ bus or shuttle service for the Menlo Park Small High School. The evaluation may be completed by the SUHSD's Transportation Department or by an SUHSD-designated consultant with expertise in transit planning and operations. The SUHSD shall not be held responsible for delays outside of its control that affect the completion of this evaluation (e.g., the SUHSD has not received information from other agencies that is needed to complete the evaluation).
- If the SUHSD, in coordination with ~~and~~ SamTrans and/or the City of Menlo Park determines that dedicated bus or shuttle service is feasible, the SUHSD shall initiate the service as soon as possible, ~~with the goal to provide service by~~ but no later than the start of the ~~2021-2022~~ 2019-2020 school year.
- If it is determined that such service is not feasible because there is insufficient or overly dispersed ridership such that service would be prohibitively expensive (as determined by the SUHSD, Sam Trans, and/or the City of Menlo Park), disruptive to other transit lines or ridership, or logistically infeasible (e.g., too long of a commute time), the evaluation shall consider if, when, and how the obstacles that make such service infeasible could be addressed and should be re-evaluated (e.g., student enrollment is too low and needs to be higher, there is insufficient student density along potential bus routes, etc.). The SUHSD shall re-evaluate the feasibility of transit service at appropriate intervals, with intent to initiate service as soon as possible after it is determined such service is feasible.
- If it is determined that such service is feasible, the SUHSD shall coordinate with SamTrans and the City and evaluate the opportunity for providing reduced or subsidized transit fares as a means to promote and increase ridership.

Mitigation Measure TRA-1D: Provide Bus Service to the Menlo Park Small High School

The District shall provide bus service to and from the Menlo Park Small High School as follows:

- School bus service shall be in place in time for the 2018-2019 school year and there shall be capacity to transport 25 students to and from school. The actual ridership level will depend on student demographics; however, the District shall make every effort to maximize student ridership.
- The school's TDM Program shall include an evaluation of whether there it is feasible and appropriate to expand bus service as school enrollment increases and changes. Factors that affect whether such expansion of service would be considered feasible would include student demographics, existing ridership levels, compliance with TDM performance standards, and costs associated with additional bus service.

Mitigation Measure TRA-1E: Consult with the City of Menlo Park on an Voluntary Payment to the City's Transportation Impact Fee Program

Prior to the start of the 2018-2019 school year, the District shall consult with the City of Menlo Park to:

- Negotiate a reasonable and proportionate voluntary payment to the City's TIF Program. The voluntary payment shall consider and take into appropriate account the uncertainty associated with whether such a voluntary payment to the City or another agency to improve transportation-related infrastructure would substantially lessen the project's impacts and be implemented in a reasonable timeframe. The voluntary payment shall also consider the trip reduction benefits associated with Mitigation Measures TRA 1A, TRA-1B, TRA-1C, and TRA-1D. The SUHSD shall work with the City to identify the schedule for the voluntary payment of the project's TIF.
- As part of the negotiation, the SUHSD and the City shall consider whether it is preferable to substitute SUHSD staff time and participation in any City-sponsored transportation planning or travel demand management programs in-lieu of cash payment.

Mitigation Measures TRA-1A, TRA-1B, ~~and~~ TRA-1C, TRA-1D, and TRA-1E would require the SUHSD and/or the Menlo Park Small High School to take steps to avoid and/or reduce vehicle trips generated by school students, faculty, and staff, as well as negotiate an agreement with the city to contribute the proposed project's fair share contribution towards infrastructure improvements; however, the reduction in vehicle trips would not fully offset project trips, and a voluntary payment to improve transportation-related infrastructure is not guaranteed to improve all facilities impacted by project traffic~~some measures may yield no trip reductions if they are found not be feasible for the school~~. As such, these measures may not fully reduce the potentially significant impacts on the intersections, roadway segments, regional routes of significance, and freeway interchanges listed in Table 4-13, Table 4-14, and Table 4-15. Impact TRA-1, therefore, is considered a significant and unavoidable impact of the project.

On pages 4-29 to 4-30 of the Draft EIR, Mitigation Measures TRA-2B and TRA-2C have been revised as follows:

Mitigation Measure TRA-2B: Reduce Potential Off-Campus Student Loading and Unloading

The Menlo Park Small High School shall prepare and implement a formal, written policy outlining student loading and unloading procedures for the school. The policy shall:

- Describe the student loading and unloading areas at the school
- Contain a map depicting student loading and unloading areas
- ~~Explicitly describe that~~Prohibit off-campus student loading and unloading at adjacent businesses and on adjacent ~~roadways is admonished and discouraged by the school~~

The school shall distribute this policy to each incoming freshman and sophomore at the beginning of the school year (the policy ~~may~~shall be included in the Student Handbook), and shall also publish the policy in school newsletters and/or other materials at least once a year. As part of this policy, school staff shall, upon receipt of a complaint regarding off-

campus student loading and unloading, ~~strive~~ use appropriate efforts to identify and dissuade the individual responsible for the off-campus loading or unloading from repeating their activity.

Mitigation Measure TRA-2C: Participate in City of Menlo Park's Bayfront Transportation Management Association

The SUHSD shall coordinate with appropriate stakeholders (such as the City of Menlo Park, SamTrans, and local businesses) if and when the City of Menlo Park establishes its Bayfront Transportation Management Association (TMA) to assess and recommend changes to signage, pedestrian facilities, and other solutions that would address pedestrian and bicycle safety concerns, improve safe routes to schools, and improve traffic circulation in the Bayfront Area. The SUHSD shall update the school's Safe Routes to School Map as new traffic circulation patterns or infrastructure is recommended and implemented by the TMA.

On pages 4-30 to 4-31 of the Draft EIR, the discussion under Impact TRA-3 has been revised as follows:

Impact TRA-3: The Menlo Park Small High School could result in result in indirect environmental effects resulting from a parking shortage.

The proposed Menlo Park Small High School is located in the City's Bayfront Area, which currently consists primarily of general industrial lands (zoned M2 by the City). Although the City has adopted off-street parking requirements for M2 Districts, it does not have parking requirements specific to schools. For this reason, the TIA prepared for the project estimated parking demand for the proposed school based on information available from ITE as well as surveys of parking demand at two similarly-sized SUHSD schools – Everest High School and East Palo Alto High School.

The ITE parking generation rates for high school land uses are equal to 0.09 parking spaces per student. Based on the ITE rate, the proposed project would need to provide approximately 71 parking spaces (36 for students and 35 for staff/faculty members) at build-out. Parking availability at Everest High School and East Palo Alto High School is higher, equal to 0.16 and 0.17 parking spaces per student, and these schools report the existing parking supply is sufficient to serve students and staff[7]. Assuming a parking generation rate of 0.17 spaces per student, it is estimated that at full capacity, the Menlo Park Small High School could require up to 74 parking spaces (for both students and staff). If the rate were applied only to students, the project could require up to 103 parking spaces ~~students~~ (68 for students and 35 for staff).

As described in Section 4.1.6, the proposed site plan includes ~~50~~58 parking spaces oriented along the site's northern and western perimeter. Thus, the proposed school may not provide sufficient on-site parking for the proposed student enrollment and staff; the estimated deficiency could be between ~~21~~13 to ~~53~~45 spaces. In addition, although there is currently off-site parking available on Jefferson Drive, the City is considering prohibiting

[7] At the time of the survey, Everest High School had 381 students and 23 staff and a total of 72 on- and off-site parking spaces, while East Palo Alto High School had 317 students and 30 staff and a total of 50 parking spaces on site. Everest High School acknowledges that students take advantage of off-site parking that is available near the school.

parking on Jefferson Drive in the near future. If the City were to prohibit parking on Jefferson Drive, it would remove the closest on-street parking for overflow student vehicles and school visitors.

The District notes that a shortage of parking is not in and of itself a physical change to the environment that requires evaluation under CEQA; however, Impact TRA-3 evaluates the indirect effects that could result from a parking shortage at the proposed Menlo Park Small High School. The potential indirect environmental effects associated with this parking deficit could include air quality and noise emissions (from vehicles spending time searching for a parking spot), water quality effects (e.g., oil leaks from vehicles), and traffic impacts (vehicle passing through an intersection multiple times searching for a parking spot). Given the estimated range in parking deficit (between 13 and 45 spaces), these indirect effects are expected to be minimal, particularly for noise (there are currently no noise sensitive land uses near the proposed school site). Nonetheless, ~~T~~to reduce the potential indirect air quality, water quality, and traffic impact associated with the project's potential ~~for~~ parking deficit,~~s would lead to potentially significant indirect effects,~~ the SUHSD shall implement Mitigation Measures TRA-3A, TRA-3B, and TRA-3C below.

On page 4-31 of the Draft EIR, Mitigation Measure TRA-3A, TRA-3B, and TRA-3C have been revised, as follows:

Mitigation Measure TRA-3A: ~~Maximize On-Site Parking~~Limit and Control On-Site Student Parking

The ~~SUHSD~~Menlo Park Small High School shall limit and control on-site student parking by requiring students to obtain a parking pass to park on-site. Parking passes may be free or fee-based. The number of passes available to students shall be based on the final design of the project, and shall be equal to the total number of permanent parking spaces on-site, less the number of faculty and staff assigned to the school. The number of passes may be increased if the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B indicates an excess of faculty and staff parking spaces. ~~maximize on-site parking at the Menlo Park Small High School site. This may be accomplished by designing the eastern perimeter of the site to accommodate daily parking for students/staff or short-term parking for visitors (outside of school drop-off and pick-up periods).~~

Mitigation Measure TRA-3B: ~~Identify~~Designate, Limit, and Control Off-Campus Parking ~~Areas~~

To reduce the potential indirect effects associated with students searching for off-campus parking, ~~T~~the Menlo Park Small High School shall, by December 1, 2020:

- Identify and designate off-campus parking areas for students. Such areas could be identified by ~~engage~~ engaging the city, local businesses, and other land uses in the Bayfront Area to identify underutilized or vacant parking areas that could be used by school staff and/or students during times when school is in session.
- The amount of off-campus student parking to be provided shall be sufficient to make up for the difference between student demand for parking and the number of on-site student parking spaces. The amount of off-campus student parking

necessary for the school may also be determined by the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B.

- Once sufficient off-campus parking areas have been identified, the school shall prepare and implement a formal, written off-campus policy identifying ~~outlining~~where and when students (and staff, if necessary) may ~~areas where staff and students can~~ find available off-campus parking. The policy shall ~~discourage~~prohibit parking in areas where the school has not reached an agreement~~s and/or understanding~~ with the appropriate entity owning or controlling the parking. ~~The school shall also publish the location of off-campus parking areas in school newsletters and/or other materials at least once a year.~~
- The Menlo Park Small High School shall limit and control parking on designated off-campus areas by requiring students to obtain a pass to park in designated off-campus parking areas. Parking passes may be free or fee-based.
- If sufficient off-campus parking areas cannot be identified, the Menlo Park Small High School shall incorporate additional measures into the school's TDM Program in accordance with Mitigation Measure TRA-1A until off-site parking demand matches the available off-site parking supply the school has obtained.

Mitigation Measure TRA-3C: Coordinate with the City on Parking Prohibitions

The Menlo Park Small High School shall coordinate with the City of Menlo Park on parking prohibitions on Jefferson Drive. The ~~goal~~purpose of this coordination shall be to evaluate whether it is feasible to permit temporary, short-term, school-related parking that can be used for visitors, parent-teacher conferences, etc. in a manner that is consistent with the city's goals.

Mitigation Measures TRA-3A, TRA-3B, and TRA-3C would identify and provide sufficient on- and off-site parking that would avoid and/or minimize the potential indirect environmental effects associated with potential parking deficits at the Menlo Park Small High School. ~~by maximizing on-site parking opportunities, informing and directing students of available off-campus parking areas, and making short-term, on-street parking available for visitors, thereby reducing the time spent searching for parking.~~ In addition, Mitigation Measures TRA-1A, TRA-1B, ~~and~~ TRA-1C, TRA-1D, and TRA-1E would reduce vehicle trips generated by the school, which would also reduce potential indirect effects associated with potential parking deficits at the Menlo Park Small High School. Thus, with the implementation of these measures, Impact TRA-3 would be rendered a less than significant impact.

On page 4-32 of the Draft EIR, the following references have been added:

Hexagon 2016a. *Supplemental Traffic Analysis for the Proposed Menlo Park Small High School Project at 150 Jefferson Drive.* Gilroy, CA. September 13, 2016.

3.5 HAZARDS AND HAZARDOUS MATERIALS (DRAFT EIR CHAPTER 8)

On page 8-14, the first paragraph at the top of the page has been revised as follows:

In summary, the Pipeline Safety Hazard Assessment prepared for the project indicates there is a less than significant risk of a pipeline failure or other release impacting the proposed School Site and its students, faculty, and staff. Nonetheless, the Pipeline Safety

Hazard Assessment recommends the SUHSD plan for such scenarios. Accordingly, the SUHSD would ~~implement Mitigation Measure HAZ-2 below, which requires the proposed Menlo Park Small High School to appropriately~~ plan for and incorporate protocols that address pipeline-related emergencies into the school's emergency plans.

On page 8-15, the following reference has been added to the Draft EIR:

Cornerstone 2015. *Vicinity Risk Evaluation, 150 Jefferson Drive, Menlo Park, California.* Prepared by Cornerstone Earth Group for the SUHSD. Redwood City, CA. August 14, 2015.

Geologica 2013. *Report Phase I Environmental Site Assessment 150 Jefferson Drive, Menlo Park, Ca.* Prepared by Geologica, Inc. for Comerica Bank. San Jose, CA. July 31, 2013.

3.6 CUMULATIVE IMPACTS (DRAFT EIR CHAPTER 12)

On page 12-10, the second paragraph under section 12.2.16 has been revised as follows:

The TIA prepared for the Menlo Park Small High School Project also evaluated the increase in vehicle trips resulting from the Menlo Park Small High School Project under cumulative and cumulative plus project conditions (see Appendix C and Appendix J).

On page 12-10, Tables 12-2 and 12-3 have been revised as follows:

Table 12-2 Cumulative Plus Project Conditions – Intersection Level of Service

Study Intersection	Jurisdiction	Unacceptable LOS?(A)	
		AM	PM
1. Bayfront Expressway and Marsh Road	CMP / State	**Yes(A)**	**Yes(A)**
2. Constitution Drive and Independence Drive	Menlo Park	**Yes(A)**	No
3. U.S. 101 NB Ramps and Marsh Road	State	**Yes(A)**	**Yes(A)**
4. U.S. 101 SB Ramps and Marsh Road	State	**Yes(A)**	**Yes(A)**
5. Bayfront Expressway and Chrysler Drive	State	No	**Yes(A)**
6. Constitution Drive and Chrysler Drive	Menlo Park	**Yes(A)**	**Yes(A)**
7. Jefferson Drive and Chrysler Drive	Menlo Park	No	**Yes(A)**
8. Independence Drive and Chrysler Drive	Menlo Park	No	**Yes(A)**
9. Constitution Drive and Jefferson Drive	Menlo Park	No	**Yes(A)**
10. Bayfront Expressway and Chilco Street	State	**Yes(A)**	**Yes(A)**
11. Constitution Drive and Chilco Street	Menlo Park	**Yes(A)**	**Yes(A)**
12. Bay Road and Marsh Road	Menlo Park	No	No
13. Middlefield Road and Marsh Road	Atherton	Yes	Yes

Source: Hexagon 2016 and Hexagon 2016a (see Appendix C, Table 30 and Appendix J, Table S1-3)

(A) A "No" indicates the intersection would operate at an acceptable LOS with and without project traffic. A "Yes" indicates the intersection would operate at an unacceptable LOS with and without project traffic, but the project would not contribute significantly to this condition. A bold "Yes" indicates the project contributes to a potentially significant impact because the addition of project-related traffic would cause an intersection to exceed the applicable intersection impact criteria listed in Section 4.4.1.1 (e.g., degrade an intersection from an acceptable to an unacceptable LOS or add traffic that exceeds other applicable standards, such as a volume to capacity threshold).

Table 12-3 Cumulative Conditions – Roadway Segments (Average Daily Traffic)			
Roadway Segment	**Classification**	**Roadway Volume[(A)]**	
		No Project	**Plus Project**
1. Jefferson Drive, south of Chrysler Drive	Local	~~**2,540**~~ **2,785**	~~**2,928**~~ **3,173[(B)]**
2. Chrysler Drive, between Jefferson Drive and Constitution Drive	Local	**8,800**	**9,150[(B)]**
3. Chrysler Drive, between Constitution Drive and Bayfront Expressway	Collector	**14,840**	**15,151[(B)]**
4. Independence Drive, north of Chrysler Drive	Local	~~**5,900**~~ **6,094**	~~**5,939**~~ **6,133[(B)]**
5. Constitution Drive, between Jefferson Drive and Chilco Street	Collector	5,750	5,810
6. Chilco Street, between Constitution Drive and Bayfront Expressway	Collector	**10,140**	**10,168**
Source: Hexagon 2016 and Hexagon 2016a (see Appendix C, Table 32 and Appendix J, Table S2) (A) A bold value indicates the roadway volume exceeds the road class capacity listed in Table 4-9. (B) The project would contribute to a potentially significant impact because the addition of project-related traffic would exceed road segment impact criteria listed in Section 4.4.1.2.			

On page 12-12 of the Draft EIR, the discussion of the project's contribution to cumulative traffic impacts has been revised as follows:

> As described in Chapter 4, the District considers travel demand management and trip reduction measure to be appropriate and feasible for the Menlo Park Small High School Project. To reduce the potential increase in vehicle trips associated with implementation of the Menlo Park Small High School Project under cumulative plus project conditions, the District shall implement Mitigation Measures TRA-1A, TRA-1B, and TRA-1C described in Chapter 4. The District also considers school bus service (Mitigation Measure TRA-1D) and negotiation with the city on a voluntary payment to the city's TIF Program for the purposes of improving transportation-related infrastructure (Mitigation Measure TRA-1E) to be feasible mitigation measures. These measures would require the District and/or Menlo Park Small High School to take steps to avoid and/or reduce vehicle trips associated with the implementation of the project or improve existing transportation infrastructure that would be impacted by the project; however, the reduction in vehicle trips that would occur would not fully offset the increase in trips that could under the project, and some measures may yield no trip reductions after coordination with other agencies and entities. As such, these measures may not fully reduce the potentially significant impacts on the intersections, roadway segments, regional routes of significance, and freeway on-ramps listed in Table 12-2 to Table 12-5. Impact CML-1, therefore, is considered a significant and unavoidable impact.

3.7 ALTERNATIVES (DRAFT EIR CHAPTER 13)

On page 13-3 and 13-4, the discussion of the Redistricting Alternative in Draft EIR section 13.2.2 has been revised as follows:

In 2014, the District adopted new attendance boundaries for each of its four comprehensive high schools – Menlo-Atherton High School, Carlmont High School, Sequoia High School, and Woodside High School. These new boundaries took effect with the start of the 2015-2016 school year, and the growth in enrollment forecast to occur at these comprehensive high schools is based on these new attendance areas. The new attendance areas were designed to both accommodate and distribute the increase in student enrollment forecast to occur throughout the District, avoiding overcrowding at any one school, but also ensuring existing school facilities are not under-utilized. In addition, community feedback received by the SUHSD during the year-long redistricting process emphasized a strong desire to align middle school and high school attendance to foster community togetherness, which is considered a tenet of the SUHSD's approach to education, and a strong disinterest in de-coupling middle school and high school enrollment boundaries.

The closest high schools to the Menlo Park Small High School Project are Menlo-Atherton High School, Sequoia High School, and Woodside High School. The District anticipates that population growth within these schools' attendance areas would add approximately 58, 178, and 133 students, respectively, to these schools by 2021. The District has prepared master plans for these campuses to accommodate this increase in growth. Each of these schools are currently at or close to capacity and it is difficult to accommodate an additional 400 students on top of the already forecasted increase in enrollment expected to occur at these campuses. To do so would require building additional classroom, student support (e.g., food services, athletic fields), and administrative facilities at these campuses. The Menlo-Atherton High School and Sequoia High School campuses are space constrained and would require substantial redesign and construction of three story or higher buildings in and near residential. The EIR the SUHSD prepared for the Menlo-Atherton High School Facilities Master Plan considered three-story buildings, but found such construction would be incompatible with the scale of surrounding land uses and require greater setbacks (in accordance with Division of the State Architect requirements) which, in turn, necessitate the construction of building with less square footage. This renders these sites untenable for cost-efficient new construction of this type.

The District does not consider it likely that ~~viable to redistrict~~ school attendance boundaries could be adjusted again to equitably shift ~~additional~~ students from one enrollment area to ~~any other comprehensive high~~ school another while maintaining community togetherness, avoiding overcrowding, and avoiding the need for three-story or higher classroom buildings. Furthermore, at this time, the only school where the 400 students that would be served by the proposed small high school could even be potentially accommodated is Woodside High School, although development in Redwood City associated with the General Plan and a number of specific plans is anticipated to generate students, some of which could attend Woodside High School. Woodside High School is located at 199 Churchill Avenue in Woodside, just southwest of the intersection of Woodside Road (SR 84) and Alameda de las Pulgas. These are high volume roadways that would be impacted by vehicle trips. Thus, redistricting would merely serve to shift vehicle trips, and would not avoid or substantially lessen the proposed project's traffic impacts. It may also result in the construction of three-story or higher buildings in an low-density residential area, which could result in a potentially significant or significant and unavoidable aesthetic impact.

In addition, ~~T~~this alternative would not achieve ~~any~~ most of the specific objectives set for the Menlo Park Small High School Project. Redistricting does not support preparation and planning for future increases in enrollment (as explained above additional facilities would be required to accommodate student enrollment growth), and would not result in a new small high school in the southern part of the District that uses a career technical education / linked learning approach. ~~In addition, redistricting would likely increase air quality and traffic impacts if students that currently reside near the proposed Menlo Park Small High School were forced to travel farther to reach other school campus, and would therefore not avoid or substantially lessen the significant and unavoidable impacts of the proposed project.~~

Since redistricting would not avoid or substantially lessen the proposed project's significant and unavoidable traffic impacts, nor achieve most most of the objectives set for the proposed project, ~~For these reasons,~~ the District has rejected this alternative from further consideration.

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CHAPTER 4 RESPONSES TO DRAFT EIR COMMENTS

This chapter contains a summary of the written comments received on or related to the Draft EIR during the public review period from July 8, 2016 through August 22, 2016. This chapter also provides a written response by the District, as the CEQA Lead Agency for the project, to each comment raising a significant environmental issue submitted on the Draft EIR.

The SUHSD received eight comment letters during the Draft EIR review period pertaining to the contents of the Draft EIR, including one letter from a state agency (the CPUC) and three letters from local agencies (City of Menlo Park, Menlo Park Fire Protection District, and San Mateo County Department of Public Works), four letters from members of the public. In addition, the SUHSD received two letters from the SCH confirming state agency comments. Each commenter was assigned a letter (i.e., "A", "B", etc.) and each specific comment was assigned an alpha-numeric identification number, as summarized in Table 4-1.

Table 4-1 Summary of Public Comments on the Draft EIR

ID	Commenter *(Affiliation)*	Comments
A	Mr. Alex McIntyre (*City of Menlo Park)*	A1 – A14
B	Mr. Harold Schapelhouman *(Menlo Park Fire Protection District)*	B1 – B5
C	Raayan Mohtashemi (*San Mateo County Public Works Department)*	C1 – C24
D	Felix Ko *(California Public Utilities Commission)*	D1
E	Scott Morgan *(California State Clearinghouse)*	E1
F	Scott Morgan (*California State Clearinghouse)*	F1
G	Frank Petrilli *(Arent Fox – Legal Counsel representing David Bohannon)*	G1 – G27
H	Mr. Richard Schlenker *(Exponent Engineering)*	H1 – H5
I	Mark Moragne *(R&M Properties)*	I1 – I3
J	Patti Fry *(Interested Individual)*	J1 – J5

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CITY OF MENLO PARK

COMMENT LETTER "A"

August 22, 2016

Mr. Matthew Zito
Chief Facilities Officer Address
480 James Avenue
Redwood City CA 94062

RE: Menlo Park Small High School, Draft EIR Comments

Dear Mr. Zito:

A1

Please find attached the City of Menlo Park's comments on the Draft Environmental Impact Report (DEIR) for the Menlo Park Small High School Project (SCH# 2016022066).

The City appreciates the opportunity to comment on the proposed project. The attached comments reiterate our concerns with transportation and traffic, particularly regarding access to the proposed school, parking, and the proposed mitigation measures. Our comments are detailed in the attachment. Please contact Nikki Nagaya, Transportation Manager at 650.330.6770 with any questions.

The City looks forward to your responses on these concerns.

Sincerely,

Charles Taylor for
Alex D. McIntyre
City Manager

Comments:

A2

1. As described in the DEIR, pages 4-8 and 4-9 Section 14010 1 of California Code of Regulations, school districts are required to select a site that is located within the proposed attendance area to encourage student walking and avoid extensive bussing. However, the DEIR also describes (page 2-6, Section 2.1.2 Existing Access) that "[v]ehicular and pedestrian access to the proposed school site and vicinity is limited due to barriers such as the SR 84 to the north (Bayfront Expressway) and west (Marsh Road), the Dumbarton Rail Corridor to southeast, and U.S. 101 to the south/southwest." See also references to limited site access and parking in Section 2.3.2 Circulation and Parking (page 2-12), Impact TRA-2 (the project could cause or contribute to conflicts and/or dangerous interactions between pedestrians, bicyclists, and vehicles, page 4-28). The DEIR does not address how the proposed project is consistent with this CCR requirement and should be revised.

A3

2. Data provided in the DEIR and TIA including trip generation rates in Tables 4-5 and 4-6 and parking rates provided in TRA-3 discloses that other District schools have significantly higher vehicle trip rates and parking demand when compared to industry-standard rates for a public high school. The two surveyed schools, additionally, are located in predominantly residential neighborhoods, with significant numbers of homes within walking distance. The TIA (Appendix C, page 107) describes that 25-35% of students at Everest and East Palo Alto High Schools walk, bike or take public transportation to the schools. The proposed school, however, is located in an industrial area. While the DEIR discloses that the school site is only 0.2 miles from Suburban Park-Lorelei Manor-Flood Triangle and 0.4 miles from the Belle Haven neighborhood in Menlo Park, these distances are measured without context of the existing street network. Accounting for actual travel routes and patterns, the proposed school is actually 1.5 miles to Lorelei Manor, 2 miles to Flood Triangle, 2.4 miles to Suburban Park and 1.2 miles to Belle Haven. Additionally, walking routes to Suburban Park-Lorelei Manor-Flood Triangle neighborhoods especially would require crossing the US 101/Marsh Road interchange, Bayfront Expressway at least twice, and traveling along streets that do not yet have completed sidewalks. It is unlikely that local students may be close enough or find suitable routes to walk to the proposed school. The transportation analysis should revise the trip generation analysis to account for the anticipated higher rates of driving to the proposed school compared to Everest or East Palo Alto High Schools.

A4

3. The following comments are provided on TRA-1.
   a. TRA-1 discusses several infrastructure improvements needed to accommodate the proposed school, including new traffic signals, new lane striping and potential widening to accommodate new travel lanes. However, the EIR does not require the District to install, or even collaborate with the City to install, any such improvements to handle the additional traffic

A4 (Cont.)

anticipated for the school, and leaves the improvements unmitigated. Specific comments on proposed measures are provided in the following section.

b. The mitigation discussion dismisses payment of the City's transportation impact fee on the grounds that traffic is anticipated to occur in the non-peak hours. However, the premise of entire analysis includes school afternoon peak in evening peak to provide a "conservative analysis." The District should have conducted evening peak hour trip generation surveys (4pm – 6pm) to accurately quantify the impacts occurring in the evening peak hour and develop required mitigations for the proposed project, instead of making such conservative assumptions that even itself dismisses the applicability and results of the analysis.

c. City supports the Districts efforts to provide TDM program that could aid in reducing trips to the site. However, as trip generation counts at Everest show, vehicle trip rates are double to triple a standard public high school. This demonstrates the District has significant ground to cover to provide a successful TDM program. The mitigation measure should be revised to require a TDM plan upon the school opening, so that students, parents, and faculty members are provided these programs from the beginning. Waiting until the proposed school is fully occupied in 2020-2021 will create a situation where the school will then by trying to modify existing travel patterns and behavior – which is much more difficult than starting in a new environment.

d. The proposed TDM program is described to have a 30% trip reduction "goal". If the District is fully dismissing the applicability of and its responsibility to provide the necessary infrastructure requirements identified as necessary in the traffic analysis, the District should at least commit to a trip reduction requirement and invest required resources in the program accordingly to actually see a reduction in trips.

A5

4. The following comments are provided regarding specific intersection measures identified in Mitigation TRA-1. The City requests the DEIR be revised as follows:

a. Bayfront Expressway/Marsh Road – the District should contribute towards the improvements required. Even though the intersection is under Caltrans jurisdiction, the District should be required to pursue such improvements through the Caltrans review and approval process. The City is pursuing implementation of the noted third eastbound right-turn lane on Marsh Road, and the District should participate in such improvements either through a fair-share contribution based on anticipated traffic levels or through payment of the City's transportation impact fee (TIF) program, which includes this measure.

b. US 101 Northbound Ramps/Marsh Road – the intersection mitigation measure proposed (addition of a second northbound right-turn lane) was recently completed as a Facebook Campus project mitigation measure. As

A5 (Cont.)

described in 3.a.i above, the City requires mitigation measures outside of its jurisdiction to be pursued and constructed, with Caltrans approval.

c. Bayfront Expressway/Chrysler Drive – the intersection mitigation proposed is a third eastbound left-turn lane from Chrysler Drive to Bayfront Expressway, and the TIA (page 70) notes that the improvement is included in the City's TIF program. This is not correct; a second left-turn lane was included in the TIF program, but a third was not envisioned. This improvement should be considered the responsibility of the District to design, coordinate with City/Caltrans and construct prior to school occupancy.

d. Constitution Drive/Chrysler Drive – the intersection mitigation measure proposed is to signalize and add turn lanes at the intersection. The TIA (page 71) correctly notes that this improvement was required for the Menlo Gateway project. Since this improvement is required and fully funded by another project, it should have been assumed to be in place for the background conditions. It is therefore unclear from the traffic analysis if the proposed improvement would provide sufficient operations of the intersection, or if queue spillback to Bayfront Expressway on Chrysler Drive could result with addition of the proposed school – requiring further improvements. The analysis should be updated to conduct this evaluation and results disclosed accordingly.

e. Jefferson Drive/Chrysler Drive – the intersection mitigation measure proposed is to signalize the intersection. The TIA (page 72) correctly notes this improvement was identified as a mitigation measure from the Commonwealth Corporate Center project; however, it is not described that the Commonwealth project was required to contribute a fair-share contribution to this intersection improvement for future signalization. The District should be responsible for a similar fair-share contribution.

f. Independence Drive/Chrysler Drive – the intersection mitigation measure proposed is to restripe the approaches to provide turn lanes. The TIA (page 72) incorrectly identifies this improvement as being identified in the Commonwealth Corporate Center project; the mitigation required for the Commonwealth project was a fair-share contribution for future signalization. The District should be responsible for implementing the proposed mitigation, or for a similar fair-share contribution towards future City improvements.

g. Constitution Drive/Jefferson Drive – the District should be responsible to implement this measure prior to occupancy of the proposed school.

h. Bayfront Expressway/Chilco Street – the District should contribute towards the improvements required. Even though the intersection is under Caltrans jurisdiction, the District should be required to pursue such improvements through the Caltrans review and approval process. The City is pursuing implementation of the noted left-turn lane on Chilco Street, and the District should participate in such improvements either through a fair-share

A5 (Cont.)

contribution based on anticipated traffic levels or through payment of the City's transportation impact fee (TIF) program, which includes this measure.

i. Constitution Drive/Chilco Street – the intersection mitigation measure proposed includes installation of a traffic signal and restriping the approaches to provide turn lanes. This was a new measure, not identified in the Commonwealth, Menlo Gateway for Facebook Campus Project requirements. The District should be responsible for implementing the proposed mitigation.

A6

5. In TRA-3 on page 4-30, the Draft EIR identifies a deficiency in the number of parking spaces provided on-site, noting that based on surveys conducted at other campuses, the school is anticipated to need between 74 and 103 spaces, while providing only 50 on site leaving a deficit of 24 to 53 spaces. The parking shortage will be further exacerbated by the location of the site limiting the number of walking and biking trips (see comment 2 above), resulting in drop-off, pick-up activities and parking demand being even higher than disclosed. As described in the Draft EIR, the City is pursuing potential parking removal on Jefferson Drive and adjacent streets in the area to provide a multi-modal transportation network and consistent streetscape; therefore, on-street parking will not be available on to alleviate the identified parking shortage, or for temporary uses such as drop-off and pick-up or visitors. Further, the proposed mitigation measures are inadequate to assure the parking shortage will be mitigated prior to occupancy and for the life of the project. The Draft EIR should be revised to provide guaranteed, enforceable measures that will mitigate the identified impact.

A7

6. Page 4-4. Bayfront Expressway (SR 84) is located northeast of the proposed school site. The Draft EIR should be revised.
7. Page 4-4. Constitution Drive is a local roadway between Independence Drive and Chrysler Drive.
8. Page 4-4, 4-5. Roadway Network. The City's proposed General Plan Update, ConnectMenlo, has proposed a new street classification system. Streets in the vicinity of the project are proposed to be reclassified to "Mixed-use Collectors". The Draft EIR should acknowledge this context.

A8

9. Page 4-6. Marsh Road shuttle service is provided by the City of Menlo Park with funding from the San Mateo City/County Association of Governments, San Mateo County Transportation Authority and fees from local employers that utilize the service. The Draft EIR should be revised.
10. Page 4-6, 4-7. Existing and Planned Pedestrian Facilities. The description of existing pedestrian facilities describes sidewalks near the proposed school site as "intermittent". While the City is working to complete the sidewalk network in the vicinity of the project site as properties redevelop, gaps near the School are expected to remain, as shown in the City's recommended priority network (see the Sidewalk Master Plan, 2009: http://menlopark.org/DocumentCenter/Home/View/475). As an example, the

A8 (Cont.)

section of Chilco Street between Terminal Avenue and Constitution Drive is currently under construction to complete new bicycle facilities and a continuous walking pathway. Sidewalks on Jefferson Drive were recently completed on the south side of the street as part of the 151 Commonwealth Drive redevelopment. The Draft EIR should be revised.

A9

11. Page 4-10. City/County Association of Governments (C/CAG). Most current CMP is 2015, not 2013. The Draft EIR should be revised.

A10

12. Page 4-12. Methodology. The City's General Plan Environmental Impact Report used HCM 2010 Operations methodology. The Draft EIR should be revised.

A11

13. Page 4-13. Tables 4-5 and 4-6. Trip Generation. No trip generation information is presented for daily conditions. Only in the TIA (Appendix C) is it disclosed that no daily trip generation data was collected, but instead the morning and afternoon trip generation estimates were increased by 10% to account for all other trips. This assumption should be substantiated with data from Everest and East Palo Alto High School, and the Draft EIR should be revised.

A12

14. Trip Generation. While the DEIR and TIA acknowledge that some of the trips to the school may already be on the roadway network for other purposes (whether home-to-work trips, trips to another school, etc.), it does not acknowledge that some of the trips may also be new – where students are close enough to walk or bike to school today, but may no longer be in the case of a new specialty high school farther from their home. This discussion should also be included.

A13

15. Appendix C. TIA. Page 35, Figure 8: Project Trip Distribution. Approximately 20% of project trips shown to travel south on US 101. However, none of the proposed trips are assigned to Willow Road or through the Belle Haven neighborhood, which underestimates potential impacts on Willow and to neighborhood cut through traffic. The project trip assignment should be revised to incorporate these travel routes and impacts/mitigation measures identified accordingly.

A14

16. Appendix C. TIA. Table 13, page 40. Existing plus Project Roadway Segment Analysis Results. Footnote 1 indicates existing ADT counts were taken from the Commonwealth Corporate Center Project DEIR, February 2014. These counts were actually completed, however, in 2012. The City TIA guidelines require counts to be no older than 6 months (see http://menlopark.org/DocumentCenter/Home/View/302, page 7). These counts should be updated to reflect current conditions, given increased traffic in the region and local occupancy and building of new construction in the area around the proposed school.

4.1 RESPONSE TO COMMENTS FROM MENLO PARK CITY MANAGER'S OFFICE

The SUHSD received 14 comments from the Menlo Park City Manager. These comments were generally related to concerns with the proposed school's traffic, access, and parking, and the proposed mitigation measures described in the Draft EIR.

Comment A1: The city has provided detailed comments on the Draft EIR reiterating concerns with transportation and traffic and suggests the SUHSD contact Nikki Nagaya, Transportation Manager with any questions regarding the city's comments.

> *Response to Comment A1:* Comment noted. The SUHSD has responded to the city's transportation and traffic concerns in Response to Comments A2 to A14 below. The SUHSD also notes SUHSD staff have attempted to contact the city's Transportation Manager via phone and email on multiple occasions regarding the city's Transportation Impact Fee (TIF) Program; however, as of October 5, 2016, neither the Transportation Manager nor any other city representative had responded to staff inquiries regarding the city's comments on the Menlo Park Small High School Project EIR.

Comment A2: The city references Draft EIR text regarding the existing transportation setting for the project and states the Draft EIR should be revised to address how the proposed project is consistent with Title 5 of the California Code of Regulations (CCR), section 14010 n, pertaining to the encouragement of student walking and avoidance of excessive bussing.

> *Response to Comment A2:* Draft EIR section S.8 explains that the suitability of the proposed school site at 150 Jefferson Drive was a prominent and controversial issue during the EIR scoping process. Although the city did not submit comments on the NOP the SUHSD issued for the EIR in February 2016, public concerns regarding the suitability of the site for school use were generally related to the industrial nature of the site and its surroundings, perceived limited access to the school site, and the current prevailing minimal and/or intermittent nature of pedestrian and bicycle friendly infrastructure (sidewalks, crosswalks, etc.). The Draft EIR, therefore, fully discloses potential issues related to the existing setting of the project and, where necessary, incorporates mitigation measures to render these issues less than significant impacts of the project.
>
> Draft EIR section 4.2.1 explains that Title 5 of the CCR contains standards related to the construction of school facilities, including a provision that school sites be located, to the extent possible, within the proposed attendance area to encourage student walking and avoid extensive bussing. The proposed school would be open to all SUHSD students; however, the SUHSD anticipates the school would primarily serve students from the southern part of the District's jurisdictional boundaries because there are similar academic programs and curricula available at other schools in the northern part of the District (Draft EIR page 2-8). Given the industrial nature and intermittent pedestrian and bicycle facilities in the city's Bayfront Area, Draft EIR Impact TRA-1 identifies the project would add vehicle trips to the roadway system and Draft EIR Impact TRA-2 identifies that the proposed project could cause or contribute to conflicts and/or dangerous interactions between pedestrians, bicyclists, and vehicles. As shown in section 3.4 of this Final EIR, the SUHSD has incorporated feasible and effective mitigation measures to reduce the amount of trips generated by the project, improve transportation infrastructure, and identify safe routes to school. With the implementation of these measures, the proposed project would encourage walking and other modes of transportation in a manner consistent with Title 5 of the CCR. Furthermore, the District

notes that Draft EIR footnote 7 (Draft EIR page 4-8), indicates that the State Superintendent of Public Instruction may grant an exemption to school siting standards if site specific circumstances warrant. The SUHSD further notes it has not requested such an exemption because the California Department of Education has not indicated that one is necessary for the project.

Comment A3: The city suggests the SUHSD revise the trip and parking generation rates used in the Draft EIR and Traffic Impact Analysis (TIA) because they are not appropriate or representative of the proposed Menlo Park Small High School Project.

Response to Comment A3: As explained in section 4.3.2 of the Draft EIR, the project TIA and Draft EIR rely on trip generation rates based on trip counts at Everest High School in Redwood City. Similarly, the TIA and Draft EIR rely on parking generation rates based on information reported by Everest High School and East Palo Alto Academy. These schools were chosen by the SUHSD as the basis for the proposed project trip and parking generation rates because they have similar operating characteristics to the proposed Menlo Park Small High School (see section 2.3.1 of this Final EIR). While it is true the TIA prepared for the project notes the proposed Menlo Park Small High School *may* have non-vehicular mode splits that are lower than other schools, the SUHSD disagrees with the city that the use of trip generation and parking rates from Everest High School and East Palo Alto Academy is inappropriate for the following reasons:

- The city's comment notes that the trip generation rates used in the Draft EIR are, in fact, "significantly higher" than industry-standard rates for a public high school. Draft EIR Tables 4-5 and 4-6 explain that the AM and PM peak hour rates used in the Draft EIR and TIA are 2.04 and 1.76 times higher than trip generation rates set forth in the Institute of Transportation Engineers' (ITE) Trip Generation Manual, 9th Edition. The ITE Trip Generation Manual is a standard reference for identifying trip generation rates by land use and is commonly used in the development of traffic impact reports, including for projects recently evaluated by the city. For example, several recent EIRs approved by the city have relied upon ITE trip generation rates, including the Menlo Gateway Project EIR, the Facebook Campus Project EIR, the Commonwealth Corporate Center Project EIR, and the 1300 El Camino Real EIR. Thus, for the Draft EIR and TIA, the SUHSD has provided a conservative analysis and gathered the best available project-specific information, as opposed to relying on generic (and significantly lower) trip generation rates identified in the ITE Trip Generation Manual, which rates the city has accepted in considering other recent projects.
- The city contends that the use of trip generation rate from Everest High School is not appropriate because this school is located in predominantly residential neighborhoods with significant numbers of homes within walking distance (i.e., this school inherently generate less vehicle trips by nature of its location). As explained in section 2.3.1 of this Final EIR, while it is true that Everest High School is generally bordered by residential areas, the city's comment ignores the fact that Everest High School is a college preparatory and charter high school available to all students in the SUHSD, with enrollment subject to a lottery system. Significant roadways and barriers within a two-mile radius of Everest High School include El Camino Real, Middlefield Road, and the Caltrain rail line. These high volume roadways and rail line are similar in nature to Marsh Road,

Willow Road, and other features described in the Draft EIR, such as the Dumbarton Rail Corridor, that limit access to 150 Jefferson Drive (see Draft EIR sections 4.1.1, 4.1.2, and 4.1.3). Furthermore, the SUHSD notes the trip generation rates derived at Everest High School are higher than those at MAHS, a comprehensive high school located less than two miles from Everest High School (SUHSD 2015)[8]. This would indicate that the different operating characteristic associated with a small, open enrollment high school such as Everest High School are important factors that should be considered in the TIA, which the SUHSD has done. Thus, the mere presence of homes near Everest High School does not mean trip generation rates and travel modes are inappropriate to use as a basis for evaluating the proposed school's potential traffic impacts. The SUHSD, therefore, concludes that it is appropriate to use trip generation rates from Everest High School for purposes of evaluating the potential traffic impacts of the Menlo Park Small High School Project.

- The city contends that the use of parking generation rates from Everest High School and East Palo Academy are not appropriate because these schools are located in predominantly residential neighborhoods with significant numbers of homes within walking distance (i.e., these schools inherently generate less parking demand by nature of their location). As explained in section 2.3.1 of this Final EIR, Everest High School and East Palo Alto Academy are similar in enrollment type and size to the proposed Menlo Park Small High School, and contain similar high-volume roadways and other barriers that could affect non-vehicular modes of transportation. Thus, parking generation rates from these schools are appropriate for evaluating the proposed Menlo Park Small High School Project's parking demand. Accordingly, the Draft EIR provides a range of parking generation rates for high school land uses, from a low of 0.09 parking spaces per student (based on the ITE Trip Generation Manual), to a high of 0.17 spaces per student (based on East Palo Alto Academy). Again, the SUHSD has taken a conservative approach and gathered the best available project-specific information, rather than relying on generic (and lower) trip generation rates identified in the ITE Trip Generation Manual.
- The city notes the Draft EIR discloses that the proposed Menlo Park Small School Site is located 0.2 miles from the Suburban Park / Lorelei Manor / Flood Triangle neighborhood and 0.4 miles from the Belle Haven neighborhood, but fails to provide "context" for these distances. While it is true the actual travel distances from these neighborhoods would be farther when using the street network, the SUHSD did not expand upon this point because these distances are only discussed in section S.1 and 2.1 of the Draft EIR, where the proposed school location is being generally described. In context, these distances were not stated to represent travel distances for potential students. As the city's comment indicates, a

[8] The Menlo-Atherton High School Facilities Master Plan Program EIR included the results of a student survey at that indicated the AM and PM peak hour trip generation rates at Menlo-Atherton High School were equal to 0.67 and 0.35 trips per student, respectively (SUHSD 2015). The trip counts at Everest High School indicate the AM and PM peak hour trip generation rates at Everest High School were equal to 0.88 and 0.51 trips per student, respectively (see Draft EIR Table 4-5). Thus, trip generation rates at Everest High School are approximately 1.31 and 1.46 times higher than Menlo-Atherton High School.

significant number of homes in the Suburban Park / Lorelei Manor / Flood Triangle and Belle Haven neighborhoods are located between 1.2 and 2.4 road miles from the proposed school site. In addition, a significant number of homes in other portions of Menlo Park, Atherton, and Redwood City are within a two-mile radius of the proposed school site. This information is entirely consistent with the information collected by the SUHSD during the trip generation counts at Everest High School (see bullet above).

While the city suggests the SUHSD revise (i.e., increase) the trip and parking generation rates used in the TIA and Draft EIR, the city does not offer any specific information or suggest any alternative methodology for doing so, nor does the city suggest identify another school that would, in its view, offer a more appropriate basis for comparison. As explained above, the SUHSD has gathered the best, project-specific trip and parking generation rates available to the SUHSD for the purposes of evaluating the potential traffic and parking impacts of the project, and the TIA and Draft EIR do not need to be revised to reflect higher trip generation rates.

Comment A4: The city provides several comments related to the SUHSD's proposed mitigation for Draft EIR Impact TRA-1 (addition of peak hour and daily trips to the circulation system).

Response to Comment A4: As explained under Draft EIR Impact TRA-1, the proposed Menlo Park Small High School Project would add AM and PM peak hour trips to the roadway system. During the initial year of operation (2018-2019 school year), the TIA estimates the project would add 56 AM and 19 PM peak hour trips. At full enrollment (2021-2022 school year), the TIA estimates the project would add 322 AM peak hour trips and 174 PM peak hour trips. The TIA and Draft EIR identify that this amount of trips would impact 11 intersections (unacceptable level of service conditions), four roadway segments (increased roadway volumes), and two freeway interchanges (substandard operations) under existing plus project and near-term plus project conditions (see Draft EIR Tables 4-13 to 4-16). The SUHSD notes it has updated the TIA prepared for the project pursuant to city comment A5 and San Mateo County comment C13. The results of the updated TIA are summarized in section 2.3 of this Final EIR and presented in full in Appendix J to this Final EIR. The updated TIA did not identify any new or more severe impacts than that identified in the Draft EIR. Rather, the updated TIA found that several intersection and roadway impacts identified in the Draft EIR would be eliminated with the change in methodology and lane geometry requested by the city's comments.

The Draft EIR proposed Mitigation Measures TRA-1A to TRA-1C to reduce project trips and associated traffic impacts. The SUHSD notes it has revised these measures, as well as added Mitigation Measures TRA-1D and TRA-1E, to clarify and amplify the trip reduction requirements incorporated into the project (see section 3.4 of this Final EIR).

- The city states the Draft EIR does not require the SUHSD to install, or even collaborate with the city to install, road improvements necessary to handle anticipated school traffic. The city's comment is noted. The SUHSD directs the city to the discussion on pages 4-25 and 4-26 of the Draft EIR. The Draft EIR discloses that the TIA prepared for the project recommends the SUHSD work with the city to implement and contribute a fair share cost of the improvements and provides a range of fees associated with the city's TIF Program; however, the Draft EIR concluded this recommendation was infeasible for several reasons.

As shown in section 3.4 of this Final EIR, the SUHSD has revised the Draft EIR's discussion regarding the feasibility of a monetary contribution to the city's TIF Program. There are several reasons why there is considerable uncertainty regarding whether or not a voluntary payment to the city or another agency to improve transportation-related infrastructure would substantially lessen the project's impacts and be implemented in a reasonable timeframe. But while such uncertainty is important to consider and factor into the calculation of what is an appropriate voluntary payment, it does not necessarily mean such a payment is infeasible for the purposes of infrastructure improvements. Accordingly, the SUHSD has concluded that the negotiation of a voluntary payment to the city's TIF Program is a feasible mitigation measure. This requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

- The city states the Draft EIR dismisses payment of the city's TIF on the grounds that traffic is anticipated to occur in the non-peak hours. As previously noted, the SUHSD has concluded that the negotiation of a voluntary payment to the city's TIF Program is a feasible mitigation measure. This requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

- The city expresses its support for the SUHSD's efforts to provide a TDM Program, but suggests the program should be operational upon the school's opening and commit to a trip reduction requirement.

  The SUHSD appreciates the city's support for the proposed Menlo Park Small High School TDM Program. The SUHSD directs the city to section 3.4 of this Final EIR, which identifies revisions to Mitigation Measure TRA-1A that clarify and amplify TDM Program requirements. These include a requirement to prepare and implement the TDM Plan prior to the start of start of the school's opening (2018 – 2019 school year), and a requirement to achieve a 45 percent mode split for non-single occupancy vehicles within four years of the school's opening (2021-2022 school year).

Comment A5: The city requests the SUHSD revise the Draft EIR to reflect specific comments on intersection improvement measures identified in the Draft EIR.

Response to Comment A5: Many of the city's specific comments are related to a request for the SUHSD to coordinate with the city on TIA-recommended improvement measures via a fair share contribution to the identified improvement and/or through the payment to the city's TIF Program. As previously noted in Response to Comment A4, there is considerable uncertainty regarding whether or not a voluntary payment to the city or another agency to improve transportation-related infrastructure would substantially lessen the project's impacts and be implemented in a reasonable timeframe. The SUHSD, however, has concluded that the negotiation of a voluntary payment to the city's TIF Program is a feasible mitigation measure. This requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

The city notes the planned traffic signal at the intersection of Constitution Drive and Chrysler Drive is a fully funded improvement measure that should have been included in the TIA prepared for the project. The SUHSD notes staff and consultants contacted the city to verify the scope of the TIA and any fully funded or implemented improvement measures that should be included in the TIA prior to publication of the Draft EIR;

however, the city did not respond to this request for information. Nonetheless, the SUHSD has updated the TIA prepared for the project to include a traffic signal at the intersection of Constitution Drive and Chrysler Drive. The updated TIA indicates this intersection would continue to operate at an unacceptable LOS even with the traffic signal (see section 2.3.2 of this Final EIR).

Comment A6: The city states Draft EIR Impact TRA-3 underestimates the parking deficiency associated with the project. The city also states the SUHSD should revise the Draft EIR to provide guaranteed, enforceable mitigation measures to alleviate potential parking deficiencies.

Response to Comment A6: The SUHSD disagrees with the city that Draft EIR Impact TRA-3 underestimates the project's parking estimates. Draft EIR Impact TRA-3 provides a range of parking demand for the proposed project, from a low of 71 spaces (based on the ITE Trip Generation Manual) to a high of 103 (based on a survey of parking generation at East Palo Alto Academy). As explained in Response to Comment A2, the use of data from Everest High School and East Palo Alto represents the best information available to the SUHSD, and is nearly two times higher than the parking generation rate contained in the ITE trip generation manual. The SUHSD notes it has revised the mitigation measures related to on- and off-site parking. The SUHSD directs the city to section 3.4 of this Final EIR, which identifies revisions to Mitigation Measures TRA-3A and TRA-3B that clarify and amplify on- and off-site parking requirements. These revisions include a definite plan for the limitation and control of on- and off-site parking at the proposed Menlo Park Small High School, including the use of parking passes and prohibitions against parking in unauthorized off-site areas.

Comment A7: The city identifies several descriptive text errors in the Draft EIR's transportation setting section and notes that streets in the vicinity of the project are proposed (as part of the city's General Plan Update) for reclassification from local to mixed-use collectors.

Response to Comment A7: Comment noted. The SUHSD has revised the EIR per the city's comments (see section 3.4 of this Final EIR). The revisions do not substantially change the setting information provided in the EIR or the EIR's evaluation of potential environmental impacts from project implementation.

In regards to the city's General Plan Update and proposed roadway reclassification, while the EIR does provide summary information on the city's General Plan Update (see Draft EIR section 1.1.3), the TIA evaluated impacts to roadway segments based on the existing classification at the time the SUHSD released the NOP for the EIR. The city did not comment on the scope of the EIR during the public review period for the NOP. Nonetheless, the SUHSD has updated the TIA to provide an evaluation of potential roadway segment effects under the city's proposed reclassification (see section 2.3.3 of this Final EIR). The updated TIA indicates the project would result in three less roadway segment impacts under near-term plus project conditions and two less roadway segment impacts under cumulative conditions if the city were to proceed with the reclassification; however, the SUHSD notes that this analysis is provided for information purposes only. The project's potential impacts on roadway segments is based on their existing classification as identified in Draft EIR Tables 4-4 and 12-3.

Comment A8: The city states it is working to complete the sidewalk network in the vicinity of the proposed project but expects gaps to remain.

Response to Comment A6: Comment noted. The Draft EIR includes a description of existing and planned pedestrian facilities in section 4.1.3.1. As part of the Draft EIR development, the SUHSD reviewed pedestrian conditions as they existed at the time the NOP was issued, as well as information on planned sidewalks in the city's Sidewalk Master Plan. Accordingly, the Draft EIR describes that sidewalks are and will continue to be partially or completely missing on most of the roads that could be used to access the proposed school site, including Jefferson Drive (see Draft EIR Figure 4-2). This lack of pedestrian connectivity was adequately described and evaluated under Draft EIR Impact TRA-2. The SUHSD would implement Mitigation Measures TRA-2A, TRA-2B, and TRA-2C, as revised (see section 3.4 of this Final EIR) to promote and engage students on safe travel patterns and the need to use designated facilities where available. As part of this mitigation, the SUHSD would coordinate with the city to identify a Safe Route to School Map for distribution to students and parents, as well as participate in the city's Bayfront Transportation Management Association to assess and recommend changes to signage and pedestrian facilities that address safety and circulation concerns.

Comment A9: The city identifies that the most current version of the C/CAG CMP is the 2015 version, not the 2013 version referenced in the Draft EIR. Accordingly, the city requests the SUHSD revise the Draft EIR.

Response to Comment A9: Comment noted. The Draft EIR incorrectly identifies the most current version of the C/CAG CMP as the 2013 version. The SUHSD has confirmed the TIA prepared for the project was done so in accordance with the 2015 CMP and has revised the EIR to indicate this.

Comment A10: The city notes its General Plan EIR used the Highway Capacity Manual (HCM) 2010 operations methodology, not the 2000 methodology, and states the Draft EIR should be revised.

Response to Comment A10: The SUHSD notes the LOS analysis contained in the TIA was completed using the VISTRO software and analysis model based on the Highway Capacity Manual 2000 methodology, which was consistent with information provided by the City of Menlo Park to SUHSD staff (see section 2.3.2 of this Final EIR). This information consisted of the preliminary intersection LOS calculations for the city's General Plan Circulation Update (dated January 2015).

As described in section 2.3.2 of this Final EIR, the SUHSD has updated the TIA prepared for the project to use the HCM 2010 methodology, as well as revised lane geometry for two study intersections per city comment A5. The updated TIA indicates the project would result in less overall intersection impacts using the updated methodology. Accordingly, the SUHSD has revised the Draft EIR to reflect the results of the TIA's updated LOS evaluation (see section 3.4 of this Final EIR).

Comment A11: The city states the Draft EIR, Tables 4-5 and 4-6, do not present daily trip generation information, nor does the TIA substantiate its estimate of daily trip generation. Accordingly, the city states the SUHSD should revise the Draft EIR.

Response to Comment A11: The SUHSD notes that Draft EIR Tables 4-5 and 4-6 provide information on AM and PM peak hour trip generation only. The SUHSD directs the city to Draft EIR Table 4-14, which lists the average daily traffic volume on study roadway

segments with and without the project. Thus, the Draft EIR does present information on the daily traffic conditions. The city is correct that the TIA and Draft EIR estimate daily traffic volumes by adding the project's AM and PM peak trips together and then multiplying this sum by 10% (this equates to about an additional 50 daily vehicle trips). Given the school's size and lack of athletic facilities and programs, the SUHSD does not anticipate that daily traffic would be substantially higher than the total peak hour traffic generated by the project. Thus, the Draft EIR adequately analyzes daily traffic conditions and potential impacts and does not need to be revised.

Comment A12: The city states that the Draft EIR should acknowledge that some of the trips generated by the proposed project would be new trips.

Response to Comment A12: The city is incorrect when it states the Draft EIR does not acknowledge that some of the trips generated by the proposed project would be new trips. Rather, Draft EIR section 4.3.3 includes a discussion related to this issue, stating (emphasis added): "Assuming all school trips are new trips may result in double counting of existing trips already on the roadway network (and included in the existing traffic counts); however, there is insufficient information to ascertain precise travel patterns and routes. For this reason, the TIA conservatively assumed that all project traffic represents *new* trips at all study intersections (Draft EIR page 4-14)".

Comment A13: The city states the TIA prepared for the project should be revised to incorporate travel on Willow Road as well as travel through the city's Belle Haven neighborhood.

Response to Comment A13: The city is correct that the TIA prepared for the project did not assign a trip distribution percentage to Willow Road or the Belle Haven neighborhood. The TIA did not evaluate the potential for the project to impact Willow Road because this is a direct access route to MAHS from the Belle Haven neighborhood and City of East Palo Alto. As explained in section 2.3.4 of this Final EIR, the trip distribution assignment presumes that traffic associated with the new school are new trips on the roadway system. The Draft EIR and TIA explain this is a conservative assumption that is likely to overestimate traffic impacts attributable to the project because the new school is not responsible for enrollment growth within the District. Rather, the SUHSD is developing the new school to respond to increases in enrollment already occurring in the District. For example, as discussed in section 2.3.4 of this Final EIR, there are more than 600 students that live within a two- to four-mile radius of the proposed Menlo Park Small High School, but currently attend MAHS or SHS. The trips generated by these students when they travel from home to school and vice versa are part of the existing transportation setting and roadway counts used to evaluate the proposed project's potential traffic impacts. As indicated in section 2.3.1 of this Final EIR, data from Everest High School indicates approximately 76% of its students reside within a four mile radius of the school. Thus, it reasonable to presume that traffic that would be added to key access routes such as Middlefield Road and Willow Road would likely be a diverted trip that is already on the roadway system (and most likely already using the system to access MAHS). For this reason, the TIA does not need to be revised to evaluate travel on Willow Road.

Comment A14: The city states the TIA should be revised to reflect updated ADT counts for Jefferson Drive and Independence Drive.

Response to Comment A14: At the request of the city, the SUHSD has updated the ADT counts for Jefferson Drive and Independence Drive as part of the TIA's updated roadway segment analysis (see section 2.3.3 of this Final EIR and Response to Comment A7. The updated ADT counts do not result in any new or more severe impacts thanthat identified in the Draft EIR.

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COMMENT LETTER "B"

Menlo Park Fire Protection District

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August 22, 2016

Matthew Zito
Chief Facilities Officer
Sequoia Union High School District
480 James Avenue
Redwood City, CA
email – smallhighschool-eir@seq.org

Re: Comments on Menlo Park Small High School Draft EIR

Dear Mr. Zito:

We appreciate the opportunity to provide comments on the Environmental Impact Report (EIR) for the Menlo Park Small High School Project (Project) proposed by Sequoia Union High School District (SUHSD). As the fire and emergency services provider for the Project, it is critical that the potential safety issues presented by the Project be properly analyzed and mitigated.

The proposed Project will be located in an existing industrial zone. The presence of a High School in this type of setting creates significant safety concerns based upon an "incompatible use" model. Although the uses in this area are currently transitioning, there are still business uses that present public safety issues with few ways of controlling future occupancy and use. B1

The Fire District wants to make sure that it can properly address public safety issues related to the Project. The main concerns of the Fire District are: (1) hazards located adjacent to the School site; (2) traffic congestion in the area caused by the Project and the more dense and intense development proposed under the City's General Plan Update and M-2 Rezoning; and (3) potential flooding.

1. Hazards Adjacent to Project Site

There are a number of properties surrounding the Project site that have hazardous materials permits. Attached to this letter is a Map showing the properties with hazardous materials permits. As the EIR acknowledges, one of those businesses, Exponent, performs products to failure which presents a significant risk to the school's students and teachers. B2

For the other properties with hazardous material permits, the greatest risk to the Project population could be a fire, explosion, spill or chemical release into the air, with a potential need to shelter students and teachers in place, which would require controlling the students from leaving and addressing parent concerns who may potentially attempt to gain access to the site.

All of these scenarios could distract commanders and firefighters from addressing primary tactical issues as they would need to adjust their strategies to specifically address significant life safety issues.

The EIR states that the Project has addressed the risk by building a wall on the Exponent side of the Project site and providing air filtration in the building for any possible chemical releases. However, the risk remains. In addition, although the uses in this area are changing, there will continue to be increases in properties with hazardous materials permits in the future.

B2 Con't.

The school also will face risks from these future permits. There are historical zoning reasons why this type of proposal is troubling and potentially dangerous if located in this type of industrial setting, especially when it comes to children.

2. Traffic Congestion

The EIR identifies significant impacts on roadways which cannot be mitigated. These impacts are from the Project itself and overall cumulative development in the area. These impacts are similar to those identified in the City of Menlo Park General Plan EIR. The Fire District is concerned with the impacts of traffic congestion on the provision of fire services in the area. The increase traffic congestion will affect the ability of the Fire District to meet the time based performance standards adopted by the Fire District Board in Resolution 1818 dated September 15, 2015.

B3

The Fire District is particularly concerned with the significant traffic impacts on emergency access routes identified in the EIR. Increased congestion on emergency access routes will adversely affect response times for emergency vehicles placing life and property in danger. The Project will have impacts on Chilco Street on which Station 77 is located. SUHSD, in coordination with the City, should consider and consult with the Fire District on feasible mitigation measures to address the traffic impacts on emergency access routes. For example, changes in street design and potential new alternative emergency response routes are mitigation measures that SUHSD and the City should consider to address these significant impacts.

3. Impacts of Sea Level Rise and Flooding on Fire Services

Mitigation measure HYD-1 requires the District to raise the project site one foot above the existing base flood elevation, or to approximately 8.25 feet above mean sea level. This one foot raise would accommodate an approximate 12-inch rise in flood levels associated with sea level rise by mid-century (i.e., approximately 2050), which is anticipated to be the useful life of the project. The one foot raise may not protect the site against future floods should worst case scenario projections for sea level rise occur by mid-century (two feet); however, it does provide a reasonable level of protection for the project.

B4

Even if worst-case scenarios were to occur, increased flooding risks would be unlikely to result in injury or death due to the expected progression in sea level rise and the fact that students and staff are not likely to be at the site should a major flood event be predicted. Thus, raising the site one-foot above present day base flood elevations is considered to be effective mitigation for project against sea level rise until the end of its useful life, and Impact HYD-1 would be rendered a less than significant impact.

4. Conclusion

The Fire District is a strong supporter of the School District and its mission to educate children. However, the District does not support the placement of a High School in a zoned industrial neighborhood. Therefore, the Project impacts identified in this letter should be addressed.

B5

The Fire District appreciates SUHSD's consideration of these EIR comments on this important project. The Fire District, as a fellow public agency and a responsible agency under CEQA, looks forward to working with SUHSD to ensure that the Project's impacts on the Fire District and student and public safety are fully addressed and mitigated in the EIR.

Sincerely,

Harold Schapelhouman, Fire Chief

cc: Fire Board, Board of Sequoia Union High School District

Hazardous Materials Permit

Menlo Park Fire Protection District

4.2 RESPONSE TO COMMENTS FROM MENLO PARK FIRE PROTECTION DISTRICT

The SUHSD received five comments from Harold Schapelhouman, Chief, Menlo Park Fire Protection District. These comments were generally related to concerns with the proposed school's compatibility with surrounding uses, impacts on congestion and emergency response times, and the proposed mitigation measures described in the Draft EIR.

Comment B1: The Menlo Park Fire Protection District comments it is critical that potential safety issues be properly analyzed and mitigated. The Menlo Park Fire Protection District notes the proposed project will be located in an existing industrial zone that creates significant safety concerns due to an "incompatible" high school land use. The Menlo Park Fire Protection District also notes that the area is transitioning from industrial uses, but that there are still business that present public safety issues.

Response to Comment B1: The SUHSD concurs that potential safety issues, including the safety of SUHSD students and staff, is a critical element in the planning and operation of a new high school.

section 1.1.4 of the Draft EIR explains that Title 5 of the California Code of Regulations (CCR) requires the SUHSD to select a school site that provides safety and supports learning. The SUHSD continues to coordinate with the California Department of Education (CDE) to ensure the site meets all applicable standards set forth in Title 5 of the CCR as well as the California Education Code and CEQA. Accordingly, the Draft EIR adequately discloses and evaluates the site for air quality (see Draft EIR Chapter 5), geology and soils (See Draft EIR section 3.3.3), ground water (see Draft EIR Chapter 9), traffic (see Draft EIR Chapter 4), and other hazards (see Draft EIR Chapter 8) that may pose a risk to site and school safety.

In regards to the "incompatible" nature of the proposed high school land use, section S.8 of the Draft EIR identifies the suitability of a school in an industrial / commercial portion of the City of Menlo Park as an area of controversy; however, the SUHSD considers the proposed site suitable for school development for several reasons.

First, as described in section 3.3.5 of the Draft EIR, the SUHSD provided written notice of its proposed acquisition of 150 Jefferson Drive to the City of Menlo Park's Planning Commission on January 7, 2015. On January 26, 2015, the City's Planning Commission adopted Resolution No. 2015-01, determining the proposed project is consistent with the city's General Plan. One reason for this consistency finding was the fact that the city's General Plan "Limited Industry" designation allows for public and quasi-public uses. Another reason for this consistency finding was the fact that the M-2 zoning designation allows private schools as a conditional 'Special Use". In its review for consistency, the city found that it had permitted two other schools in industrial areas of the city without negatively affecting the M-2 district or nearby parcels: Mid-Peninsula High School at 1340 Willow Road and Casa de Bambini Preschool at 1215 O'Brien Avenue.

Second, several sections of the Draft EIR, including section 1.1.2, section 2.1.1, and section 3.3.5, describe the area surrounding 150 Jefferson Drive as part of the Bohannon Industrial Park, an area where nearly all parcels are zoned by the City of Menlo Park as General Industrial District (M-2) or Commercial Business Park (M-3). This part of the city, however, is transitioning from 1960's and 1970's industrial / warehouse land uses to newer, corporate campuses, and mixed-use biotechnology, commercial, and office, and

other land uses. As described in Draft EIR section 1.1.2, notable projects in the area include the Commonwealth Corporate Center Project, the Menlo Gateway Project, and the Facebook Campus Project. A specialized, technology-focused small high school will create a cohesive blend with the new technology-focused developments occurring in the area. Thus, although the exact nature of the future changes in occupancy of nearby land uses remains unclear, it is reasonable to expect that the changes envisioned in the city's Connect Menlo General Plan Update will, over time, result in changes in land use that reduces potential safety hazards both to and from use of the site as a small high school. For these reasons, the SUHSD considers the 150 Jefferson Drive suitable for use as a small high school.

Comment B2: The Menlo Park Fire Protection District provides information on the existing hazards and hazardous materials setting of the project and surrounding properties, including a map that shows properties near the proposed school site that have a hazardous materials permit. The Menlo Park Fire Protection District comments that Exponent Engineering (an adjacent business) poses a specific, significant risk to the proposed school's students and staff, and that the proposed design features incorporated into the project to address risks posed by the Exponent facility do not eliminate the risk posed by this facility. Finally, the Menlo Park Fire Protection District also comments that fires, explosions, spills, or chemical releases from other facilities may cause students and teachers to shelter in place, posing a distraction to primary tactical response issues, and that future projects may require additional hazardous materials permits.

Response to Comment B2: The SUHSD appreciates the Menlo Park Fire Protection District's information on facilities that have a hazardous materials permit. The SUHSD notes the Draft EIR adequately summarizes pertinent hazards and hazardous materials setting information for the proposed project (see Draft EIR section 8.1), including setting information on known contamination, historical and present land uses, site-specific contamination, and the presence of railroads, electric power lines, pipelines, storage tanks, and other potential hazards, including Exponent Engineering. As referenced in Draft EIR section 8.4, this setting information was obtained from site visits and reports the SUHSD commissioned for the proposed project, including:

- A 2013 and 2014 Phase 1 Environmental Site Assessment
- A 2014 Phase 2 Soil, Soil Vapor and Groundwater Quality Evaluation (see Draft EIR Appendix G2)
- A 2015 air quality health risk assessment (see Draft EIR Appendix D)
- A 2015 Pipeline Safety Hazard Assessment (see Draft EIR Appendix G4)
- A 2015 Vicinity Risk Evaluation
- A 2016 DTSC-reviewed and approved Preliminary Environmental Assessment Report (see Draft EIR Appendix G3)

The preparation of the Phase 1 and health risk assessment reports listed above involved consultation with and a review of available records from various agencies, including the City of Menlo Park, Menlo Park Fire Protection District, San Mateo County Department of Environmental Health, DTSC, and San Francisco Bay Regional Water Quality Control Board. Thus, the information provided by the Menlo Park Fire Protection District was already considered as part of the SUHSD's site acquisition and EIR processes, and this

information does not change the findings of the Draft EIR regarding potential hazards and hazardous materials impacts.

The SUHSD notes that the Draft EIR contains a specific description of the adjacent Exponent facilities at 149 Commonwealth Drive and 160 Jefferson Drive, both in the Draft EIR's project description (see Draft EIR section 2.1.1) and the Draft EIR's Hazards and Hazardous Materials setting (see Draft EIR section 8.1.7.1). The SUHSD has coordinated with Exponent on its concerns regarding the proposed Menlo Park Small High School Project since 2014. The SUHSD commissioned a specific records search and site visit of the Exponent facilities by a qualified engineering firm to obtain information regarding potential chemical use and operations at the facilities. This Vicinity Risk Evaluation concluded the facilities do not use significant quantities of hazardous materials. The evaluation also concluded that the small quantities of hazardous and flammable materials stored at the facilities (e.g., inert gases, lab chemicals, propane) would not be expected to significantly impact the proposed school provided they are properly stored, used, and disposed in accordance with their manufacturer's recommendations. Despite the low risk to future occupants of the school posed by this facility, the SUHSD has incorporated features into the proposed school's design that further reduce potential risks posed by Exponent and other facilities, including:

- The SUHSD has located outdoor use areas between the school building and Jefferson Drive, away from Exponent facilities
- The SUHSD has increased wall height at the shared property line with Exponent
- The SUHSD has incorporated a heating, ventilation, and air conditioning system with a minimum efficiency rating value (MERV) of 13, which is capable of filtering 90% of particles greater than one micron in size, instead of the standard MERV 8 filtraion, which is capable of filtering 85% of particles greater than three microns in size
- The SUHSD would incorporate potential risks from Exponent operations into the proposed school's emergency response plans.

Although it is not possible to completely eliminate risks posed by facilities that use, store, handle, or dispose of hazardous materials, the Draft EIR has adequately disclosed and evaluated the potential safety issues associated with Exponent facilities. While it is true the proposed school could be used to shelter in place in the event of an emergency, the SUHSD notes this would be true for any type of emergency, including an earthquake. The ability to safely shelter in place is intended to enable the Menlo Park Fire Protection District and other emergency responders to focus on primary tactical issues and not be "distracted" by the proposed school. Finally, the risks from future facilities and hazardous materials is speculative, as the SUHSD cannot address a future risk that is presently unknown. The SUHSD notes, however, that with the changes envisioned in the city's General Plan (e.g., approximately 5,300 new residential units in the Bayfront Area) it would be reasonable to expect that, over time, the area would include less industrial facilities that use and store hazardous materials (see also Response to Comment B1).

Comment B3: The Menlo Park Fire Protection District expresses concern that the Draft EIR identifies significant impacts on roadways that cannot be mitigated and that this congestion would affect the Menlo Park Fire Protection District's ability to meet time based performance standards adopted by the Fire District Board.

Response to Comment B3: The SUHSD has coordinated with the City of Menlo Park Police Department and Menlo Park Fire Protection District regarding emergency access throughout the project's development, as indicated by listing of the Fire Marshall and Commander Dave Bertini of the Menlo Park Police Department in section 15.2 of the Draft EIR (persons and organizations consulted). Fire department access is briefly discussed in section 2.3.2.1 and 11.1 of the Draft EIR. As indicated in these sections, the SUHSD has coordinated with the Menlo Park FPD to provide sufficient drive aisles, turning radii, and staging areas to support ladder truck operations.

As identified in Draft EIR Table 4-6, the proposed project would generate 322 net AM peak hour and 174 net PM peak hour trips). The Draft EIR identifies that the addition of project trips to the roadway system would result in significant and unavoidable impacts at most intersections and roadway segments studied in the TIA and Draft EIR (see Tables 4-13 to 4-16 as revised in this Final EIR); however, the Draft EIR concludes the project would not impair implementation or physically interfere with an emergency response plan. This is because Jefferson Drive is not a city-identified flood evacuation route, and SUHSD has coordinated with the Menlo Park Fire Protection District and incorporated changes into the project design to accommodate emergency access onto the site.

As part of the Draft EIR development process, in 2015 the SUHSD confirmed with the Menlo Park Police Department and Menlo Park Fire Protection District that the project would not affect response times such that new or altered facilities would be required (see Draft EIR page 11-3). As discussed in section 2.3.4 of this Final EIR, some project-related trips would be diverted trips that show up as a new trip only on the intersections in the immediate vicinity of the proposed school. Thus, the proposed project would not affect emergency access or response times at intersections and roadways more distance from the proposed school. The proposed project would also be unlikely to affect response times in the immediate vicinity of the proposed school because Menlo Park Fire Protection District Station 77 is located on Chilco Street. This roadway provides direct access to Constitution Drive, Jefferson Drive, and the school's immediate surroundings. As shown in Table 4-7, only seven percent of project-related trips (approximately 23 trips) were assigned to this roadway (compared to 25% for Marsh Road). These trips would be concentrated during the 15 minute period immediately before and after the start and end of the school day; however Chilco Road is an approximately 40-foot wide roadway that can accommodate temporary stoppage of vehicles while an emergency vehicle passes. In addition, the SUHSD has incorporated Mitigation Measures TRA-1A to TRA-1E into the project to achieve a 45% non-single occupancy vehicle travel mode split for school students, faculty, and staff, which would further reduce the project's less than significant contribution to any potential service delays.

The SUHSD notes that other publically available information indicates a need to expand Menlo Park FPD Station 77 on Chilco Street; for example, the city's General Plan Update Draft EIR indicates the fiscal year 2015-2016 Menlo Park Fire Protection District budget (adopted on June 16, 2015) identified the need to expand Station 77 even before the NOP was released for the proposed project (in February 2016). The CEQA threshold of significance for the provision of fire protection services is not the impact to response times themselves, but if a reduction of response times results in the need for new or altered facilities, the construction which would result in significant environmental impacts. Since the proposed project is not requiring the expansion of Station 77, and is not anticipated to affect or substantially alter response times, the impact is and remains

less than significant. The SUHSD has and will continue to work with the Menlo Park Fire Protection District to address concerns of access and safety.

Comment B4: The Menlo Park FPD expresses agreement that Mitigation Measure HYD-1, requiring the SUHSD to raise finished floor elevations at least one foot above base flood levels, would render risks from future inundation and flood levels associated with sea level rise a less than significant impact.

Response to Comment B4: Comment noted. The SUHSD appreciates the Menlo Park FPD's concurrence with this EIR finding.

Comment B5: The Menlo Park Fire Protection District expresses support for the SUHSD in general, but not the specific location of the Menlo Park Small High School, and looks forward to working with the SUHSD to ensure the proposed project's impacts on the Fire District and student and public safety are fully addressed and mitigated.

Response to Comment B4: Comment noted. The SUHSD appreciates the Menlo Park Fire Protection District's general support. As explained in Response to Comments B-1 to B-3, the Draft EIR adequately addresses the Menlo Park Fire Protection District's concerns regarding the suitability of the proposed school site and its potential impacts on adjacent land uses, fire protection services, and public safety. The Draft EIR states (pg. 2-12, as revised) "the SUHSD would continue to coordinate with the Menlo Park Fire Protection District on fire access and emergency response issues". The SUHSD looks forward to continued coordination on these matters; however, the SUHSD also notes that as indicated in Table 2-3 of the Draft EIR, the Division of the State Architect is primarily responsible for reviewing school plans and specifications for fire and life safety purposes.

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COMMENT LETTER "C"

Raayan Mohtashemi

08/04/16

San Mateo County

Summary

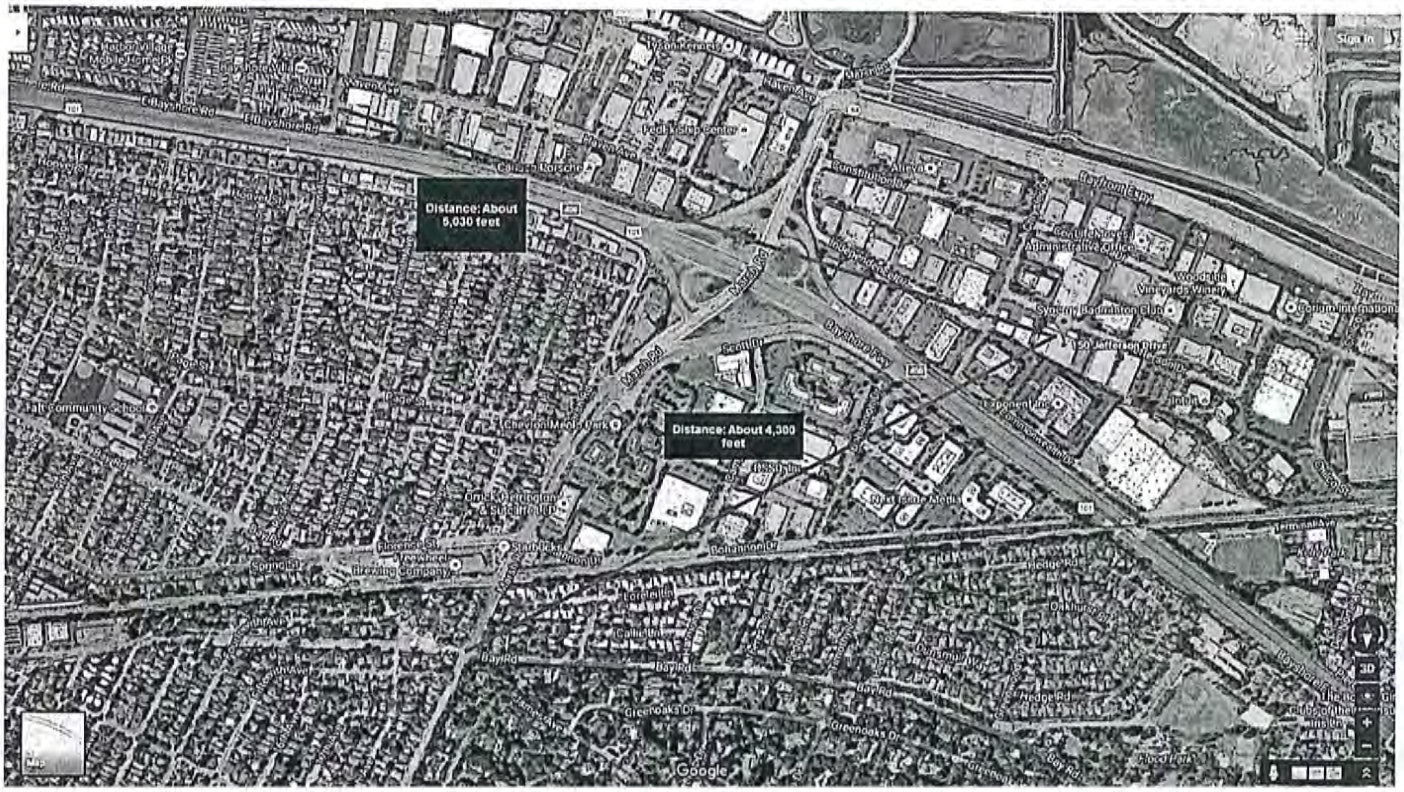
Menlo Park Small High School (MPSHS) Draft Environmental Impact Report

The Sequoia Union High School District (SUHSD) is planning to construct a small high school in the City of Menlo Park by the 2018-2019 school year. The school site is located at 150 Jefferson Drive. Approximately 100 students would attend the school in its first year, and 400 by the 2021-2022 school year. The school site is located in an industrial/office park setting. The Bayfront Expressway (CA Hwy 84) runs parallel to Jefferson Drive. The next closest major arterial to the school site is Marsh Road. Willow Road is the next closest major arterial that crosses US Hwy 101.

Contact with EIR Team: No contact was made with San Mateo County regarding this project (according to the EIR). C1

Area Studied

The traffic consultant did not study any intersections or roadway segments maintained by the county. The closest segment of county maintained road to the school site is the intersection of Marsh Road and Bay Road (the lower left side of the photo below), approximately 4,300 feet away. The county also maintains as sliver of road on Haven Avenue East of US Hwy 101 (the upper left side of the photo below). This portion is approximately 5,030 feet away from the school site. C2



School Population:

The school site's size limits the number of students to 400. The school site is projected to reach its maximum of 400 students by the 2021-2022 school year. In its first year of operation (2018), the school will consist of 100 students and 15 faculty/staff. By 2021 there will be 35 faculty/staff at the school. There is no potential for expansion beyond 400 students at the site.

Trip Generation, Distribution/Origin:

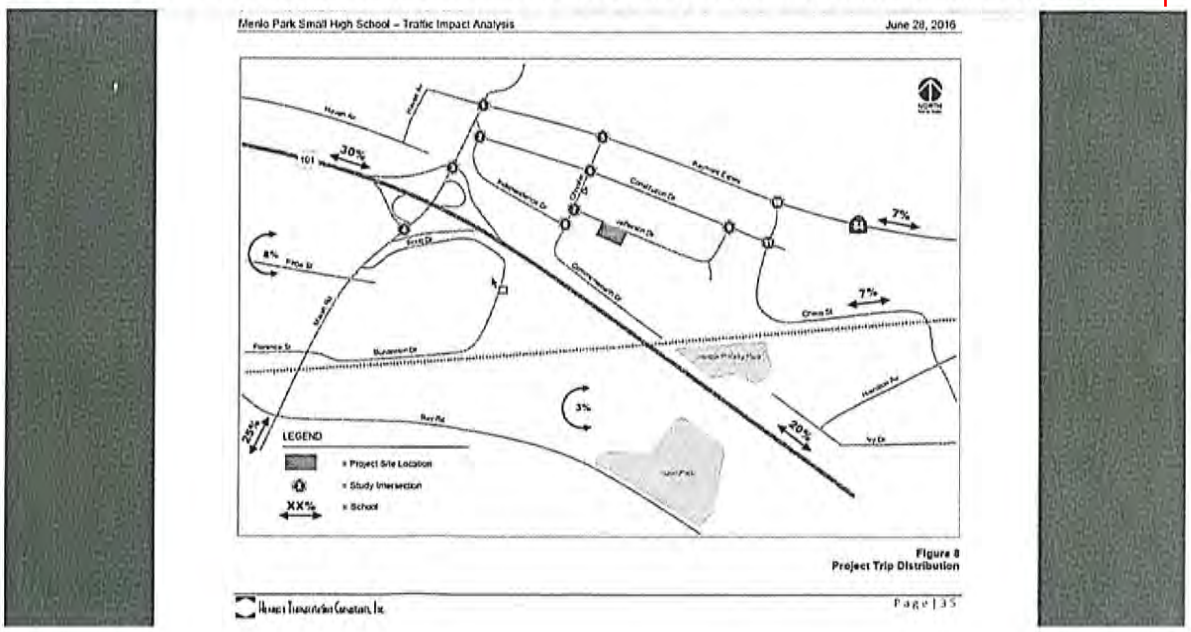
The school is designed to meet demand for the southern part of SUHSD (although anyone in the district may enroll). According to the EIR, enrollment is mainly expected from Redwood City, Menlo Park, and East Palo Alto. Therefore, the county's right of way (ROW) will be affected by trips to/from the school.

The consultant used nearby Everest High School to estimate the trips generated by the new school. Everest High School has the same potential population (400 students). Everest High School is located in a residential neighborhood, while the proposed high school will be located in a light industrial/office setting. Therefore, there may be discrepancies between the trips generated by Everest and the trips eventually generated by the proposed school. C3

The consultant estimates a trip distribution of about 8% to/from the North Fair Oaks (NFO) neighborhood. The trip distribution for Marsh Road is 25%. Based on an illustration provided by the consultant (see below), it seems that all of the 25% distribution from Marsh Road will travel in county ROW, and could originate from Middlefield Road.

Also, the trip generation estimates 3% distribution from the Suburban Park/Lorelei Manor/Flood Park Triangle area. The southern border of the neighborhood is Bay Road between Willow Road and Marsh Road. Therefore, the trips generated from this area may impact the intersection of Marsh Rd/Bay Rd, and therefore county-maintained segments of road.

Main effects: Traffic in NFO will be impacted. The main impact will be on Marsh Road. However, the consultant did not make it clear where on Marsh Road the traffic would originate.



Trip Generation Table (based on Everest High School Counts)

	In	Out	Total
AM	202	152	354
PM	91	115	206

Conservative Estimates:

The consultant assumed that every trip generated by the school is a new trip, and not a detoured trip. The consultant noted that the school is meant to serve existing demand in the SUHSD, and not increase demand. Therefore, most trips generated by the school would already exist, but create a higher burden on Marsh Road (since Marsh Road is one of the few arteries crossing 101 to the school.

However, even if the estimates are conservative and overestimated, any detoured trips would still affect county ROW by changing parents' routes as they drive to work/etc. (eg. Parents in NFO would start taking Marsh Road to work if they were dropping off their kids at the proposed high school instead of Sequoia High School to the North).

C4

Progressive Impact:

The school is planned to open in 2018 with 100 students. Every year, that number will grow to about 400 students by the 2021-2022 school year. Therefore, the traffic impact will be progressive in the four year period.

Athletic Facilities:

There are no athletic facilities on the school site. Therefore, the consultant mentions that students would use existing facilities at other school sites in the district. It seems that SUHSD has not yet entered into agreement for the school to use a specific facility. The consultant does

not mention considering the traffic impact that the daily travel to the athletic facilities would have on the road network.

C4 Cont.

Planned Traffic Improvements

There are at least three approved projects in the vicinity of the school site. The approved projects include plans for improving the roadway network/traffic congestion in the school area. It is unclear when these improvements will be implemented. It is also unclear how the planned improvements would benefit the intersections close to county ROW and the segments leading into county ROW.

C5

Traffic Analysis (see table below for more detailed impacts)

The project itself will have a significant impact on the following intersections and times:

Marsh Rd/US 101 SB off-ramp AM: Current LOS D downgraded to LOS E.

Marsh Rd/US 101 NB off-ramp PM: Current LOS D downgraded to LOS E.

Intersection	Marsh Rd/Bayfront		Marsh Rd/US 101 NB off-ramp		Marsh Rd/US 101 SB off-ramp	
Existing LOS	AM	F	C		D	
	PM	F	D		C	
Existing + Proj. Conditions (400 students)	AM	F	C		E	
	PM	F	E		C	
Near Term 2018 (w/o project conditions)	AM	F	F		F	
	PM	F	F		F	
Near Term 2021 (w/o project conditions)	AM	F	F		F	
	PM	F	F		F	
Near Term + Proj. Conditions (100 students 2018-2019)	AM	F	F		F	
	PM	F	F		F	
Near Term + Proj. Conditions (400 students 2021-2022)	AM	F	F		F	
	PM	F	F		F	
Notes	Marsh/84 is already at unacceptable LOS.		School will have significant impact on PM intersection, but intersection would have unacceptable LOS by 2018 w/o project conditions.		School will have significant impact on AM intersection, but intersection would have unacceptable LOS by 2018 w/o project conditions.	
Traffic improvements are planned for the area, but were not included in the traffic analysis						
Analysis assumed that all school trips are new trips on network, and not detoured trips						

Public Transit

A commuter shuttle bus connects the school site with the Menlo Park Caltrain Station. It runs to the school site in the morning and to the Caltrain station in the afternoon/evening. It is

C6

not likely that the shuttle will be used often, due to the local nature of the students' enrollment. However, if students take Caltrain from the northern part of SUHSD, they will have easy access to the school site via the shuttle.

Samtrans routes 270, 276, and 281 run nearest to the school site. However, none of the routes run in the immediate school area. Samtrans route 276 runs from Redwood City Caltrain, along Bay Rd, and ends on Marsh Road just west of US 101. Route 270 also begins at Redwood City Caltrain, runs along Bay Rd, passes over US 101 on Marsh Road, and then along Haven Avenue. The closest bus stop to the school site is on Haven Ave. The stop is a 14 minute walk from the school site. Route 281 runs near Chilco Street to Kelly Park. It never crosses the Dumbarton Railroad (so it is never on the same side as the school site). All three of these routes either do not run close enough to the school or frequently enough to be viable modes of transportation to the school site. For example, route 270 runs only once an hour in a loop. While route 281 runs every 15 minutes all day, it currently does not run close enough to the school site. The consultant mentions that the school will meet with Samtrans officials and discuss the possibility of a route serving the school site, depending on demand, etc.

C6 Cont.

The consultant also mentions a few other routes that serve local schools (such as Hillview School) and run close to Menlo-Atherton High School on Ringwood Avenue. However, there is no other mention of them besides their existence. The consultant does not mention any current plans to convert or modify any bus routes in the area, but it could occur in the future.

Bicycles/Pedestrians

The consultant summarizes the bicycle facilities in the project area, and mentions a few plans for future bicycle facilities near the school site. Some streets do not have sidewalks, and other streets have partial sidewalks in the project area. A pedestrian overpass crosses US 101 at the end of Ringwood Avenue east of Bay Road. It is possible that bicyclists or pedestrians will travel on Ringwood Avenue in county ROW to reach the overpass on their commute to school.

Parking

The school design accommodates 50 parking spots on the school site, including 2 disabled parking spots. The parking will most likely be sufficient for the first two years of daily operations, since there are only 15 faculty/staff for the 2018-2019 school year and freshman (who will be the only grade in the first year) are generally not old enough to drive. However, the parking demand will quickly grow unmanageable as the number of faculty/staff increases to 35, and the population grows to 400 students, approximately 200 of which will be old enough to drive.

C7

The current parking requirement for a high school is 0.25 spaces per student. The school will not be able to meet that threshold with its current design of 50 parking spots. The school

may redesign the east side of the property to add another row of parking, but most likely the school will still not meet the parking threshold with this addition.

The City of Menlo Park recently passed parking regulations on Jefferson Drive outside of the school. Students will not be able to park all day on Jefferson Drive. It is unlikely that students will attempt to park on streets in the county ROW, as the closest intersections are over a 20 minute walk from the school site, discouraging park-and-walk in the county ROW.

C7 Cont.

Proposed Mitigation Measures

The school will implement a Travel Demand Management (TDM) program by the 2021-2022 school year. It will be tasked with evaluating mitigation options to reduce parking and increase transit use, with a goal of 30% alternative transportation. It will also work on a "safe routes to school" map. It may be beneficial for the county to collaborate on the map if it seems that many students/parents are using county roads to get to the school.

C8

Questions:

How similar are Everest High School and the proposed small school? Is there any information on the geographic distribution of students? How many of them live within 2 miles of the site? Etc. C9

Are you sure that the school will not increase demand? Is SUHSD population increasing? C10

Will any of the traffic improvements planned by other projects help county ROW? If so, which traffic improvements? C11

Ringwood Ave in SMC ROW could also be used to get to Bay Rd, and therefore Marsh and Willow. Has the consultant studied the potential impact to Ringwood Ave from a pedestrian/bicycle and vehicular perspective? (There is a pedestrian bridge across 101 at the end of Ringwood Ave). C12

The consultant estimates 5% of students (20) will bike to school? How will student biking affect Marsh Road and Ringwood Ave/the pedestrian overpass? C13

The consultant mentions there are no athletic facilities at the school site. Will there be after-school athletic programs? If so, did the consultant take into account the daily traffic impact of traveling to these facilities? Would driving, walking, bicycling, bus, etc. be the main mode of transport to these facilities? Besides the Stanford Charter School on Myrtle Street, where would these facilities be? What percentage of students is likely to participate in athletic activities? C14

What percentage of students would live far enough away from the school to take Caltrain, and therefore the shuttle? C15

Could modification of bus routes serving/running on county roads occur in the future? What is the possibility of that? If so, would the schools the routes are currently serving receive less service or more service? C16

The current parking requirement for a high school is 0.25 spaces per student (according to ITE guidelines). How does the school plan to achieve this requirement? C17

Has the consultant studied the potential impact on Middlefield Road? Although outside of the project area, Middlefield Road is a major access point to Marsh Road, which has a 25% trip distribution. C18

Did the District contact other agencies besides the City of Menlo Park for the EIR? C19

The TDM program has a goal of 30% alternative transportation trips. Has this program been implemented in the SUHSD or a similar school site? Has a similar alternative transportation goal been met by a similar program in the district or a similar school site? When does the school hope to meet this goal? C20

The district has determined it will not cost-share traffic improvements with the City of Menlo Park. Rather, it will attempt to mitigate its traffic impact by directly controlling trips to/from school. How effective is direct mitigation vs. traffic improvements? C21

Due to the nature of the school and as described by the trip generation, cars will both enter and leave the school site during both AM and PM peak hours. Did the consultant model traffic flow to account for cars leaving the site in the AM peak hour? C22

What traffic simulation tool did the consultant use? Vissim or Synchro? Other? C23

The trip generation uses Everest High School for its estimates. However, Everest High School lies in a residential area, while the proposed school lies in a light industrial/office setting. In this case, wouldn't the trips per student rate be higher than that for Everest High School? C24

4.3 RESPONSE TO COMMENTS FROM SAN MATEO COUNTY

The SUHSD received 24 comments from Raayan Mohtashemi, San Mateo County Department of Public Works. These comments were generally related to concerns with the proposed school's traffic impacts.

Comment C1: The county states the SUHSD did not contact the county regarding the project.

> *Response to Comment C1:* The county's comment is not correct. The SUHSD directs the county to Draft EIR Appendix A, which contains pertinent EIR scoping documents, including a full list of the individuals and agencies that were provided the February 2016 NOP for the EIR. As noted on page 3 of the NOP distribution list, the SUHSD delivered the NOP to both the county's Planning and Building Department and C/CAG (delivery was confirmed at both agencies on February 23, 2016). The SUHSD did not receive comments on the NOP from either of these agencies. The SUHSD also directs the county to EIR Appendix I, included with this Final EIR, which contains the list of individuals and agencies the SUHSD provided a copy of the EIR's Notice of Availability and / or the EIR itself. As noted on page 3 of this distribution list, the SUHSD delivered the NOA and a compact disc containing the Draft EIR to the county's Planning and Building Department and C/CAG. Thus, the SUHSD has contacted the County regarding the proposed project.

Comment C2: The county states the TIA did not study any intersections or roadway segments maintained by the county, noting the nearest county facility is the intersection of Marsh and Bay Road approximately 4,330 feet from the school site (straight-line distance).

> *Response to Comment C2:* The county is correct the TIA did not evaluate impacts to county intersections or roadway segments. This is because county facilities and roadway segments are not anticipated to be impacted by new project trips, but rather diverted project trips that are or otherwise would be on the regional roadway system (see section 2.3.4 of this Final EIR). Nonetheless, based on the county's comments on the Draft EIR (see Response to Comment C13), the SUHSD has revised the TIA to include an evaluation of potential LOS impacts at the Marsh Road / Bay Avenue intersection and the Marsh Road / Middlefield Road intersection. As discussed in section 2.3.4 of this Final EIR, the updated TIA has found these two intersections would continue to operate at an acceptable LOS under existing plus project, near term plus project (both 2018 and 2021 conditions), and cumulative plus project scenarios.

Comment C3: The county summarizes Draft EIR information on the proposed Menlo Park Small High School's population, trip generation, and trip distribution characteristics.

> *Response to Comment C3:* Comment noted. The county's summary of the proposed school's population, trip generation, and trip distribution characteristics is generally accurate. The SUHSD notes that data from Everest High School is considered appropriate for use as a basis for evaluating the proposed project's traffic impacts for the reasons outlined in section 2.3.1 of this Final EIR and Response to Comment A3. The SUHSD also notes that it has updated the TIA to include an evaluation of LOS impacts at the Marsh Road / Bay Avenue intersection and the Marsh Road / Middlefield Road intersection. The updated TIA has found these two intersections would continue to operate at an acceptable LOS under existing plus project, near term plus project (both

2018 and 2021 conditions), and cumulative plus project scenarios (see section 2.3.4 of this Final EIR).

Comment C4: The county summarizes Draft EIR information on the proposed Menlo Park Small High School's trip generation, student enrollment, and student athletics characteristics.

Response to Comment C4: Comment noted. The county's summary of the proposed school's trip generation, student enrollment, and student athletics is generally accurate.

The county correctly notes that the project could add vehicle traffic to Marsh Road. The TIA anticipated most project-related trips added to Marsh Road would be diverted trips, and not new trips that would represent a potential traffic impact. Nonetheless, the SUHSD has updated the EIR's TIA to include an evaluation of LOS impacts at the Marsh Road / Bay Avenue intersection and the Marsh Road / Middlefield Road intersection. The updated TIA has found these two intersections would continue to operate at an acceptable LOS under existing plus project, near term plus project (both 2018 and 2021 conditions), and cumulative plus project scenarios (see section 2.3.4 of this Final EIR).

The county correctly notes the proposed school would open with 100 students in 2018 and increase to 400 students by the 2021-22 school years. The SUHSD notes the TIA prepared for the project adequately evaluates the potential impacts to the roadway system for both the 2018 and 2021 student enrollment levels.

Finally, the county correctly notes the SUHSD has not yet entered into an agreement to use off-site athletic facilities. The SUHSD does not anticipate the small high school would generate substantial vehicle trips as a result of student athletic programs. By way of example, Everest High School includes two fall programs (soccer and volleyball), two winter programs (basketball and soccer), and two spring programs (softball and baseball) which primarily use athletic facilities at other SUHSD schools. Since the TIA's PM peak hour trip generation rates are based on traffic counts at Everest High School, which includes after school athletics, the TIA's evaluation of PM peak hour traffic impacts includes any contribution due to travel to and from athletic facilities.

Comment C5: The county provides generic information on planned traffic improvements in the vicinity of the proposed Menlo Park Small High School.

Response to Comment C5: Comment noted. The county does not provide specific information on the approved projects or plans for improving the roadway network. The SUHSD notes the updated TIA includes lane geometry that reflects existing and planned infrastructure improvements that were not considered in the Draft EIR (see section 2.3.2 of this Final EIR).

Comment C6: The county summarizes Draft EIR information on public transit services and bicycle and pedestrian facilities in the vicinity of the proposed Menlo Park Small High School.

Response to Comment C6: Comment noted. The county's summary of public transit services and bicycle and pedestrian facilities in the vicinity of the proposed school is accurate and generally consistent with the information presented in Draft EIR section 4.1.2 and 4.1.3.

The county correctly notes the Marsh Road Shuttle operates between the Menlo Park Caltrain Station and the proposed school site and thus could be used by students enrolled in the Menlo Park Small High School, although the percentage of students who would

use this service is considered to be low based on information on transit ridership at Everest High School at East Palo Alto Academy (see section 2.3.1 of this Final EIR).

The county correctly notes that several SamTrans bus service lines (82, 88, 270, 276, and 281) run near the proposed school site but do not provide direct access to the site. The SUHSD notes Mitigation Measure TRA-1C, as revised (see section 3.4 of this Final EIR), requires the SUHSD to coordinate with SamTrans and the city on providing direct bus and/or shuttle service to the school site.

Comment C7: The county summarizes Draft EIR information on the proposed school's on-site parking availability, notes various parking rates and the City of Menlo Park's recent passage of parking prohibitions on Jefferson Drive, and comments that students are unlikely to park on county roads or within county rights-of-way.

Response to Comment C7: The county's summary of on-site parking availability (50 spaces) is accurate and consistent with the information presented in Draft EIR section 2.3.2 and Draft EIR Impact TRA-3. The SUHSD notes it has added eight additional permanent parking spaces to the school site bringing the total on-site parking to up to 58 spaces; the SUHSD also notes it will coordinate with the Menlo Park FPD to add nine short-term, temporary parking spaces at the school site if such temporary parking would not interfere with emergency fire access (see section 2.2.2 of this Final EIR).

The county states the current parking requirement for a high school is 0.25 spaces per student; however, the source of this requirement is not clear and the SUHSD is not subject to local zoning requirements pertaining to parking standards (see Draft EIR section 3.3.5)[9]. As discussed in Response to Comment A6, the Draft EIR presents information on a range of potential parking demand rates, and the Draft EIR adequately evaluates the indirect environmental effects associated with the project's potential parking shortages. The SUHSD notes it has revised Mitigation Measures TRA-3A, TRA-3B, and TRA-3C to clarify and provide for the clear, enforceable limitation and control of school-related parking.

The SUHSD agrees with the county that it is unlikely students will park on county streets or within county rights-of-way given the distance between the closest county road and the proposed school site (4,300 feet straight-line distance). The Draft EIR did not suggest students would potentially park on county roadways.

Comment C8: The county summarizes Draft EIR Mitigation Measures TRA-1A and TRA-2A and suggests the SUHSD coordinate with the City of Menlo Park on the development of the Safe Routes to School Map.

Response to Comment C8: Comment noted. The county's summary is accurate and generally consistent with the requirements presented in Draft EIR Mitigation Measures TRA-1A and TRA-2A. The SUHSD notes it has revised Mitigation Measure TRA-1A to require a minimum 35% mode split for non-single occupancy vehicle travel modes (increasing to 45% by the time the school reaches full enrollment). The SUHSD also

[9] Although this standard does not apply to the proposed project, it would result in a need for 100 spaces at the proposed school (400 students x 0.25 spaces per student = 100 parking spaces), which is within the range of potential parking demand presented in Draft EIR Impact TRA-3.

notes Mitigation Measure TRA-2A requires the SUHSD to coordinate with the city on the development of the Safe Routes to School Map, as suggested by the county.

Comment C9: The county questions how similar Everest High School is to the proposed project and whether there is any information on the geographic distribution of students.

Response to Comment C9: As explained in section 2.3.1 of this Final EIR and Response to Comment A3, Everest High School and East Palo Alto Academy have student enrollment and capacity characteristics that are similar to the proposed Menlo Park Small High School. These schools are also located in areas that have high volume roadways and other barrier similar to the features present in the vicinity of the proposed Menlo Park Small High School. These similarities provide a reasonable, factual basis for the SUHSD to use trip and parking demand generation data from these schools to evaluate the proposed Menlo Park Small High School's potential traffic and parking effects. The SUHSD has added information on the geographic distribution of students associated with Everest High School (see section 2.3.1 of this Final EIR); this information indicates 76% of the school's students reside within a four-mile radius. Information on the geographic distribution of the proposed school's students is not available at this time because enrollment for the school has not yet been initiated.

Comment C10: The county questions if the SUHSD is sure the proposed Menlo Park Small High School won't increase demand and whether the student population within the SUHSD is increasing.

Response to Comment C10: The SUHSD tracks students from elementary and middle school districts that feed into the SUHSD to predict future enrollment. Current enrollment at the elementary and middle school grades shows that the SUHSD will need to provide additional classrooms in order to prevent overcrowding at other existing SUHSD high schools. Although student enrollment forecasts may deviate, the SUHSD directs the county to Draft EIR section 1.1, which states "demographic forecasts completed in January 2016 indicate that student enrollment . . . is likely to increase by several hundred students or more." Furthermore, the SUHSD directs the county to Draft EIR section 2.5, which lists the objectives for the proposed project, two of which read:

- To support preparation and planning for expected future increase in student enrollment within the SUHSD;
- To establish a new small school site in the southern part of the SUHSD that helps alleviate potential overcrowding at Menlo-Atherton High School and Sequoia High School.

Student population, both in the SUHSD and the elementary and middle school districts that feed into the SUHSD, is increasing with or without the project (as explained in the Draft EIR's evaluation of the No Project Alternative; see Draft EIR section 13.3). The proposed project does not increase demand for school facilities. Rather, it is proposed to address projected increases in enrollment within the SUHSD. The SUHSD also directs the county to the discussion of potential student enrollment increases associated with the City of Menlo Park's General Plan Update (see section 2.4.1 of this Final EIR).

Comment C11: The county asks if any of the traffic improvements planned by other projects help the county's rights of way.

Response to Comment C11: Comment noted. The county does not provide any specific improvement or project that can be addressed in this response; however, the SUHSD notes that the TIA does indicate whether the infrastructure improvements recommended by the TIA were identified in previous environmental documents such as the Menlo Gateway Project EIR, the Commonwealth Corporate Center Project EIR, etc. (see Draft EIR Appendix C). In addition, the SUHSD has updated the TIA to incorporate one existing improvement (the addition of a third lane to Marsh Road) and one fully funded (but not yet implemented) improvement (installation of a traffic signal at the intersection of Constitution Drive and Chrysler Drive; see section 2.3.2 of this Final EIR). These improvements do not affect county roads or rights of way.

Comment C12: The county notes Ringwood Avenue could be used to get to Bay Road and Marsh Road and asks whether the SUHSD studied the potential for the project to impact Ringwood Avenue from a pedestrian / bicycle and vehicular perspective.

Response to Comment C12: Comment noted. The TIA prepared for the project did not evaluate the potential for the project to impact Ringwood Avenue because this is a direct access route to Menlo-Atherton High School and Laurel Elementary School. The likelihood of substantial project traffic being added to this roadway is very low, and any traffic that would be added to Ringwood Avenue would likely be a diverted trip that is already on the roadway system (and most likely already using Ringwood Avenue to access Menlo-Atherton High School).

The Draft EIR (page 4-7) notes the presence of the Ringwood Avenue overpass, which would be used by students walking and bicycling to the proposed Menlo Park Small High School. This overpass is south of the Ringwood Avenue and Bay Road intersection, which is a stop-controlled intersection with pedestrian crosswalks. The use of the overpass by students walking and bicycling to the proposed school is not anticipated to result in any new or more severe impacts than that identified in Draft EIR Impact TRA-2. The SUHSD notes Mitigation Measure TRA-2A requires the SUHSD to coordinate with the city to develop a Safe Route to School Map for the proposed Menlo Park Small High School Project that identifies facilities that promote safe travel to the school site.

Comment C13: The county notes the TIA presumes five percent of students (20 students) would bicycle to school and asks how this level of bicycle activity would affect Marsh Road and the Ringwood Avenue pedestrian overpass.

Response to Comment C13: The SUHSD does not anticipate that student bicycle traffic would affect any roadway facility. The proposed project does not present a barrier for bicyclists and pedestrians to safely cross roadways, or reduce or sever existing or planned bicycle and pedestrian circulation in the area. The SUHSD notes it has added additional bicycle parking to the school site (see section 2.2.1 of this Final EIR), such that up to 15% of students (60 students) could commute to the school via bicycle. These bicycle trips would be spread throughout the roadway system congregating on Jefferson Drive and other local roads in the vicinity of the proposed school. The Draft EIR adequately evaluates the potential for the project to cause or contribute to conflicts and/or dangerous interactions between pedestrians, bicyclists, and vehicles in Impact TRA-2.

Comment C14: The county asks if the proposed Menlo Park Small High School would have an after school athletic program and, if yes, was this activity accounted for in the TIA.

Response to Comment C14: The SUHSD directs the county to Draft EIR sections 2.2.3 and 3.3.8. The proposed school is unlikely to field one or more athletic teams until several years after the school has opened. At that time, the SUHSD anticipates the initial sports team could include a badminton team (which may practice at the Synergy Badminton Club one block from the proposed school), a soccer team (which could practice at another SUHSD high school or Flood Park, approximately two miles from the school site), or a basketball team (which could practice at East Palo Alto Academy). Since the school would lack on-site athletic facilities and would enroll students from throughout the SUHSD boundaries, the SUHSD does not expect overwhelming demand for school athletics. The SUHSD anticipates the amount of students participating in after school athletic programs in any given season would be no more than 10 to 15% of the student population. As discussed in section 2.3.1 of this Final EIR, the trip counts conducted at Everest High School, which form the basis for the proposed project's TIA, include trips associated with that school's athletic program. Thus, the TIA and Draft EIR do account of after school athletic program trips generated by the proposed small high school.

Comment C15: The county asks what percentage of students attending the proposed Menlo Park Small High Scholl would live far enough away to take Caltrain and, therefore, the Marsh Road Shuttle.

Response to Comment C15: The SUHSD notes the proposed school would have open enrollment subject to a lottery system. Since the SUHSD has not yet initiated the enrollment process, it is not known what percentage of students attending the proposed school would take Caltrain; however, the SUHSD notes that approximately 24% students that attend Everest High School live further than four miles away from the school (see section 2.3.1 of this Final EIR). Also, the SUHSD notes that while distance from the school may be one factor for taking Caltrain, proximity to a Caltrain station is also likely to be a factor for students deciding to take Caltrain.

Comment C16: The county asks if bus routes could be modified in the future and, if yes, whether this would affect service at other schools.

Response to Comment C16: The SUHSD directs the county to the discussion of SamTrans bus service on page 4-5 and 4-6 of the Draft EIR, which indicates the SUHSD met with SamTrans in April 2015 to discuss extending bus service to the proposed Menlo Park Small High School. Furthermore, Mitigation Measure TRA-1C requires the SUHSD to coordinate with SamTrans and the City of Menlo Park to evaluate the feasibility of establishing bus or shuttle service for the proposed school. The SUHSD does not anticipate the development or extension of any bus service to the proposed Menlo Park Small High School would reduce service to other area schools unless such service routes were demonstrated to be underutilized by area schools.

Comment C17: The county asks how the SUHSD will achieve a requirement of 0.25 spaces per student.

Response to Comment C17: Please see Response to Comment C7.

Comment C18: The county asks if the SUHSD has studied potential impacts to Middlefield Road.

Response to Comment C18: The TIA prepared for the project did not evaluate the potential for the project to impact Middlefield Road because this is a direct access route

to Menlo-Atherton High School (MAHS) and Encinal Elementary School. As explained in section 2.3.4 of this Final EIR, traffic that would be added to Middlefield Road would likely be a diverted trip that is already on the roadway system (and most likely already using Middlefield Road to access Encinal Middle School or MAHS). Nonetheless, the county correctly identifies that the TIA prepared for the project assigns 25% of the project trips to Marsh Road. Accordingly, the SUHSD has updated the TIA to include an evaluation of LOS impacts at the Marsh Road / Bay Avenue intersection and the Marsh Road / Middlefield Road intersection. The updated TIA has found these two intersections would continue to operate at an acceptable LOS under existing plus project, near term plus project (both 2018 and 2021 conditions), and cumulative plus project scenarios (see section 2.3.4 of this Final EIR).

Comment C19: The county asks if the SUHSD contacted other agencies besides the City of Menlo Park during the preparation of the Draft EIR.

Response to Comment C19: Yes, as indicated in section 1.1 of this Final EIR and Response to Comment C1, the SUHSD distributed both the NOP and the NOA for the EIR to state and local agencies, including the City of Menlo Park, City of East Palo Alto, City of Redwood City, Town of Atherton, San Mateo Couny, C/CAG, and Caltrans. The distribution lists for the NOP and NOA are provided in EIR Appendix A and I, respectively.

Comment C20: The county asks if the SUHSD has implemented a TDM Program with a goal of achieving a 30% mode split in alternative transportation at other SUHSD schools and what the timeframe is for achieving this goal.

Response to Comment C20: Yes. In 2015, the SUHSD prepared a Program EIR for its Menlo-Atherton High School Facilities Master Plan. This Program EIR contained a mitigation measure requiring the school to develop and implement a formal, written TDM Program designed to achieve a 45% travel mode split for walking, biking, transit, etc. (i.e., non-single occupancy vehicle travel modes). The TDM Program is entering its second year, and the qualified transportation planning firm selected to conduct to assist the school with the development of its TDM Program, multi-modal audit, etc. has confirmed the latest travel survey at MAHS indicates the school is exceeding the TDM Program standard (W-Trans 2016). Bicycle travel and increased bicycle storage at the school has been an important component of the MAHS TDM Program. The SUHSD notes the Menlo Park Small High School TDM Program required by revised Mitigation Measure TRA-1 requires the school to provide adequate bicycle parking and to increase bicycle storage capacity as demand increases (see section 3.4 of this Final EIR)

Comment C21: The county notes the SUHSD has determined it is not feasible to provide a fair share financial contribution to transportation infrastructure improvements and asks how effective direct mitigation versus traffic improvements are.

Response to Comment C21: Comment noted. As indicated in Response to Comment A4, the SUHSD has revised the Draft EIR's discussion regarding the feasibility of a fair share financial contribution and added Mitigation Measure TRA-1E to the EIR, which requires the SUHSD to negotiate with the city on a voluntary payment to the city's TIF Program.

Regarding the effectiveness of direct mitigation such as the TDM Program required by Mitigation Measure TRA-1A or the provision for transit or bus service required by Mitigation Measures TRA-1C and TRA-1D, respectively, the SUHSD notes these

measures will directly reduce vehicle trips and promote attitudinal changes toward transportation. These measures also do not have the potential to result in secondary environmental impacts from construction of new roadway facilities, or induce the use and demand for newly constructed facilities due to increased vehicle trips.

Comment C22: The County asks if the TIA considered outbound AM peak hour trips from the school.

Response to Comment C22: Yes, outbound AM peak hour trips were considered in the TIA prepared for the project. The SUHSD directs the county to Draft EIR Tables 4-5 and 4-6, which list inbound and outbound trip generation rates for the proposed project.

Comment C23: The County asks if Vistro, Synchro, or another traffic simulation tool was used in the TIA prepared for the project.

Response to Comment C23: The SUHSD directs the county to Draft EIR page 4-12, which states, "Consistent with the City's Transportation Impact Analysis Guidelines, study intersections (including CMP and state facilities) were evaluated using the VISTRO software and analysis model".

Comment C24: The County asks if the proposed Menlo Park Small High School would have higher trip generation rates than Everest High School.

Response to Comment C24: As indicated in Response to Comment A3, the use of trip generation data from Everest High School represents the best information available to the SUHSD. These trip generation rates are between 1.74 (AM peak hour) and 2.04 (PM peak hour) times higher than the ITE trip generation rates for high school land uses, and higher than the trip generation rate at nearby MAHS. Although Everest High School is located in a predominantly residential area, it is an open enrollment school with significant high volume roadways and other barriers within a two-mile radius that limit access to school site, similar to the proposed project. While the TIA does acknowledge the proposed Menlo Park Small High School *may* have higher trip generation rates than Everest High School, the substantial similarities between Everest High School and the proposed Menlo Park Small High School reduce the potential for this to occur. The county does not provide any specific information or suggestions for alternative schools to use as a basis for evaluating traffic impacts. As explained in Response to Comment A3, the SUHSD has gathered the best, project-specific trip generation rates available to the SUHSD for the purposes of evaluating the potential traffic impacts of the project, and the TIA and Draft EIR do not need to be revised to reflect higher, unsubstantiated trip generation rates.

STATE OF CALIFORNIA — Edmund G. Brown Jr., *Governor*

PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

COMMENT LETTER "D"

August 29, 2016

Matthew Zito
480 James Avenue
Redwood City, CA 94062

Re: Draft EIR
Sequoia Union High School District
SCH # 2016022066

Dear Mr. Zito,

As the state agency responsible for rail safety within California, the California Public Utilities Commission (CPUC or Commission) recommends that development projects proposed near rail corridors be planned with the safety of these corridors in mind. Working with CPUC staff early in project planning will help project proponents, agency staff, and other reviewers to identify potential project impacts and appropriate mitigation measures, and thereby improve the safety of motorists, pedestrians, railroad personnel, and railroad passengers.

The project is located near the Union Pacific Railroad Redwood Junction Industrial Lead. Please ensure the nearby crossings comply with applicable federal and state requirements. Applicable state requirements include:

- California Manual on Uniform Traffic Control Devices – Chapter 8 (http://www.dot.ca.gov/hq/traffops/engineering/mutcd/)
- CPUC General Order 26-D
- CPUC General Order 72-B
- CPUC General Order 75-D
- CPUC General Order 88-B
- CPUC General Order 118

D1

A link to the Commission's General Orders can be found here http://www.cpuc.ca.gov/crossings.

Thank you for your consideration of these comments. If you have any questions in this matter, please call me at (415) 703-3722 or email me at felix.ko@cpuc.ca.gov.

Sincerely,

Felix Ko, PE
Utilities Engineer
Rail Crossings and Engineering Branch
505 Van Ness Ave

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4.4 RESPONSE TO COMMENTS FROM THE CPUC

The SUHSD received one comment from Felix Ko, Utilities Engineer, California Public Utilities Commission. This comment was related to concerns with development projects near rail corridors.

Comment D1: The CPUC notes the proposed Menlo Park Small High School Project is located near the Union Pacific Railroad Junction Industrial Lead and requests the SUHSD ensure nearby crossings comply with applicable federal and state requirements.

Response to Comment D1: The Draft EIR accurately describes railroads and rail crossings in the vicinity of the project and potential hazards associated with them. The Union Pacific Railroad Redwood Junction Industrial Lead, which, in the vicinity of the proposed school project is more commonly referred to as the Dumbarton Rail Corridor, is described in various parts of the Draft EIR. For example, Draft EIR page 8-13 acknowledges the inactive Dumbarton Rail Corridor is located approximately 935 feet southwest of the proposed project at its closest point. In regards to this corridor, the Draft EIR states " . . .the San Mateo County Transportation Authority began preparation on an Environmental Impact Statement / EIR evaluating reactivation of the rail corridor for a commuter rail service... the project was put on indefinite hold due to a lack of funding (City of Menlo Park 2016). SamTrans is currently evaluating potential improvements to the rail corridor with the intent to identify improvement alternatives, funding, and phasing by April 2017, but has no defined plans at this point in time (SamTrans 2016). Accordingly, the likelihood of there being future train traffic along the segment of the Dumbarton Rail Corridor near the Menlo Park Small High School, and the nature of such service is speculative at this point in time." The Draft EIR also addresses existing and planned pedestrian facilities in the area around the project site. One of the areas discussed is Chilco Street, which crosses the Dumbarton Rail Corridor to the east of the project site. The Draft EIR (page 4-7) states "As shown in Figure 4-2, presently there are few classified bikeways near the proposed school site. The San Francisco Bay Trail (Class I bikeway) runs through Menlo Park along Bayfront Expressway (generally on the north side) between Haven Avenue and the Dumbarton Bridge, and a Class II bikeway is present along Chilco Street after leaving the Belle Haven Neighborhood and crossing the Dumbarton Rail Corridor (the City is currently upgrading this bikeway to a Class IV bikeway)."

In addition to the Dumbarton Rail Corridor, Draft EIR section 2.1.5 also discloses the presence of a 25-foot-wide railroad easement along the property's southern property line. As noted in the Draft EIR (page 2-7), "The District has coordinated with the railroad regarding the easement and is not proposing to place any structures within the easement."

Thus, the Draft EIR accurately describes the nearby rail corridors, crossings, and potential impacts associated with them. The proposed project would not impact any infrastructure, nor the function of, any railroad crossing. No further analysis is required.

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STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

COMMENT LETTER "E"

August 23, 2016

Matthew Zito
Sequoia Union High School District
480 James Avenue
Redwood City, CA 94062

Subject: Menlo Park Small High School Project
SCH#: 2016022066

Dear Matthew Zito:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on August 22, 2016, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

E1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2016022066
Project Title Menlo Park Small High School Project
Lead Agency Sequoia Union High School District

Type EIR Draft EIR

Description The SUHSD is proposing to construct and operate a small, three story high school facility with capacity to accommodate up to approximately 400 high school students and 35 faculty and staff. The proposed project would support high quality education and avoid overcrowding at SUHSD schools, particularly in the southern part of the district. The SUHSD would open the new school in time for the 2018-2019 school year. The proposed project would involve the following components: removal of existing site facilities (approximately 40,000 sf warehouse with associated parking and landscaping) and construction of a new high school, operation of the new high school, and a potential partnership with the San Mateo County Community College District. The proposed school would operate on a traditional schedule.

Lead Agency Contact

Name Matthew Zito
Agency Sequoia Union High School District
Phone 650-963-1411 ext 22357 **Fax**
email
Address 480 James Avenue
City Redwood City **State** CA **Zip** 94062

Project Location

County San Mateo
City Menlo Park
Region
Lat / Long 37° 28' 56" N / 122° 10' 26" W
Cross Streets 150 Jefferson Dr; Chrysler Dr, Constitution Dr, Commonwealth Dr
Parcel No. 055-243-030
Township 5S **Range** 3W **Section** 22 **Base**

Proximity to:

Highways 82; 84; 101; 109;114
Airports
Railways Dumbarton; Caltrain
Waterways SF Bay
Schools some
Land Use LU: Commercial Warehouse/ Z: General Industrial (M2) / GP: Limited Industry

Project Issues Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects; Aesthetic/Visual

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 3; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 07/08/2016 **Start of Review** 07/08/2016 **End of Review** 08/22/2016

4.5 RESPONSE TO COMMENTS FROM THE STATE CLEARINGHOUSE (08/23/16)

The SUHSD received one comment from Scott Morgan, Director, Office of Planning and Research, State Clearinghouse. This comment was related to the state agency review period for the Menlo Park Small High School Draft EIR.

Comment E1: The State Clearinghouse notes the agency submitted the Menlo Park Small High School Project Draft EIR to selected state agencies for review. The Draft EIR public review period closed on August 22, 2016, and no state agencies submitted comments by that date.

Response to Comment E1: Comment noted.

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STATE OF CALIFORNIA

GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

COMMENT LETTER "F"

August 30, 2016

Matthew Zito
Sequoia Union High School District
480 James Avenue
Redwood City, CA 94062

Subject: Menlo Park Small High School Project
SCH#: 2016022066

Dear Matthew Zito:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on August 22, 2016. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

F1

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2016022066) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

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4.6 RESPONSE TO COMMENTS FROM THE STATE CLEARINGHOUSE (08/30/16)

The SUHSD received another, subsequent comment from Scott Morgan, Director, Office of Planning and Research, State Clearinghouse. This comment was related to the state agency review period for the Menlo Park Small High School Draft EIR.

Comment F1: The State Clearinghouse notes it received comments from the California Public Utilities Commission (CPUC) on the Menlo Park Small High School Project Draft EIR after the end of the state review period, which closed on August 22, 2016. The State Clearinghouse notes CEQA does not require the SUHSD, as the CEQA Lead Agency, to respond to late comments, but does encourage the SUHSD to incorporate these additional comments into the SUHSD final environmental document.

> *Response to Comment F1:* Comment noted. The SUHSD has incorporated and responded to comments received from the CPUC after the close of the state review period (see section 4.4 of this Final EIR).

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COMMENT LETTER "G"

Arent Fox

Arent Fox LLP / Attorneys at Law
Los Angeles, CA / New York, NY / San Francisco, CA / Washington, DC
www.arentfox.com

VIA EMAIL: smallhighschool-eir@seq.org

Frank R. Petrilli
Associate
415.805.7970 DIRECT
415.757.5501 FAX
frank.petrilli@arentfox.com

August 22, 2016

Matthew Zito, Chief Facilities Officer
480 James Avenue
Redwood City, CA 94602

RE: Comments on Sequoia Union High School District Menlo Park Small High School EIR

Dear Mr. Zito,

On behalf of the Bohannon Development Company ("Bohannon"), we have reviewed the Draft Environmental Impact Report ("Draft EIR") for the proposed Sequoia Union High School District ("District") Menlo Park Small High School Project ("Project") and provide the following comments for your consideration.

At the outset, we want to emphasize that our client supports the development of a new, technology-focused magnet school in the Mid-Peninsula area, including in Menlo Park. The problem is the proposed location and the logistics of how a school operation would work on the site. The vicinity of the Project site is comprised of office and industrial uses. Simply put, we believe that the Project is poorly conceived, and would adversely impact adjacent businesses and create safety and other impacts for students. We foresee major operational issues due to the location and lack of adequate facilities, including parking, transit service, and pedestrian and bicycle facilities, all of which are extremely limited. And unfortunately, our review of the Draft EIR confirmed many of our initial concerns about how the Project would function upon occupancy. G1

We also understand the difficulty the District has experienced in finding suitable locations to meet its growing demands. That is why our client is more than willing to work cooperatively with the District to identify alternative locations and facilitate a more successful outcome. G2

With respect to the environmental review process, our review of the Draft EIR revealed significant problems regarding the adequacy of the Draft EIR's analysis under the California Environmental Quality Act ("CEQA"), including: (i) the improper rejection of feasible traffic mitigation measures and reliance on substitute mitigation measures that lack evidentiary support; (ii) a deficient analysis of the Project's parking impacts and reliance on ineffective mitigation measures that do not comport with CEQA; (iii) a deficient analysis of the Project's impacts related to safety conflicts between vehicles, pedestrians and bicyclists and associated mitigation G3

measures; (iv) a conclusory and inadequate analysis of the Project's potential greenhouse gas impacts; and (v) an inadequate analysis of the Project's potential hazards/hazardous materials impacts, including contradictions and omissions in the Draft EIR's analysis when compared to the underlying technical documentation.

As a consequence, the Draft EIR fails to fully and accurately inform decision-makers of the Project's potential environmental impacts, and fails to fulfill CEQA's basic objectives of promoting informed decision-making and identifying ways in which the Project's potential impacts could be meaningfully reduced. Pub. Res. Code § 21061. We therefore believe that the District must revise and recirculate the Draft EIR, which we hope will assist decision-makers in evaluating the merits of the Project at the proposed location.

G3 Cont.

1. Legal Standards

CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential significant environmental effects of a project. 14 Cal. Code Regs ("CEQA Guidelines)" § 15002(a)(1). Second, CEQA requires public agencies to avoid or reduce environmental impacts when "feasible" by requiring the analysis of alternatives and feasible mitigation measures. CEQA Guidelines § 15002(a)(2) and (3). The EIR, which is considered the "heart" of CEQA (*Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652), thus serves to provide agencies and the public with information about the environmental impacts of a proposed project and to "identify ways that environmental damage can be avoided or significantly reduced." *Id.* If an EIR identifies significant impacts, a lead agency may approve the project only if it finds that it has "eliminated or substantially lessened all significant effects on the environment where feasible" and that any unavoidable significant effects on the environment are "acceptable due to overriding concerns." Pub. Resources Code § 20181; CEQA Guidelines § 15092(b)(2)(A) and (B).

CEQA also requires the lead agency to adopt feasible mitigation measures that will substantially lessen or avoid the project's potentially significant environmental impacts (Pub. Resources Code §§ 21002, 21081(a)), and describe those mitigation measures in the EIR. (Pub. Resources Code, § 21100(b)(3); CEQA Guidelines, § 15126.4.) A lead agency may not rely on mitigation measures of uncertain efficacy. See *Kings Cty. Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 728 (invalidating an EIR on the grounds that the EIR failed to evaluate whether a mitigation agreement would be effective in times of water shortages). Furthermore, mitigation measures "must be fully enforceable through permit conditions, agreements, or other legally binding instruments." CEQA Guidelines § 15126.4(a)(2).

G4

Recirculation of an EIR prior to certification is required "when the new information added to an EIR discloses: (1) a new substantial environmental impact resulting from the project or from a new mitigation measure proposed to be implemented (cf. CEQA Guidelines, § 15162, subd. (a)(1), (3)(B)(1)); (2) a substantial increase in the severity of an environmental impact unless mitigation measures are adopted that reduce the impact to a level of insignificance (cf.

CEQA Guidelines, § 15162, subd. (a)(3)(B)(2)); (3) a feasible project alternative or mitigation measure that clearly would lessen the environmental impacts of the project, but which the project's proponents decline to adopt (cf. CEQA Guidelines, § 15162, subd. (a)(3)(B)(3), (4)); or (4) that the draft EIR was so fundamentally and basically inadequate and conclusory in nature that public comment on the draft was in effect meaningless." *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1130, citing *Mountain Lion Coalition v. Fish & Game Comm'n* (1989) 214 Cal.App.3d 1043. G4 Cont.

Here, the Draft EIR fails to analyze significant environmental impacts pertaining to the Project, and fails to fully consider lawful mitigation measures to address those impacts. A revised EIR must be prepared and recirculated to address these deficiencies.

2. The Draft EIR's Analysis of Traffic Impacts is Legally Inadequate and Improperly Rejects Standard Mitigation Measures for Traffic Impacts.

Chapter 4.4 of the Draft EIR discusses the potential traffic impacts from the Project. It concludes that the Project would create significant and unavoidable impacts on eleven different intersections, four roadway segments, one regional route of significance, and two freeway interchanges. See Draft EIR at pp. 4-22 thru 4-27.

As a result, the Transportation Impact Assessment ("TIA") prepared for the Project "identifies and recommends several traditional and alternative transportation infrastructure improvements to reduce the project's contribution to potentially significant transportation impacts." Draft EIR at p. 4-22. The Draft EIR summarizes these recommended mitigations, which include measures to install traffic signals, restripe traffic lanes, widening roads, adding bicycle lanes, and so forth. Although the TIA recognizes that some of the recommended mitigations are technically considered "infeasible" because they would require right-of-way acquisition or improvements that are "above and beyond" what is expected of any single project, the Draft EIR nonetheless acknowledges that "in general, *the TIA considers infrastructure improvements that do not require roadway widening to be potentially feasible measures that could be undertaken by the City or other appropriate agency* . . . [and] nearly all of the infrastructure improvements have been recommended for other projects in the immediate vicinity[.]" Draft EIR at p. 4-25 (emphasis added). The exception involves an intersection at Constitution Drive and Jefferson Drive, which requires mitigation to remedy impacts that are specifically caused by the Project (i.e., a separate northbound turn lane onto Constitution Drive). G5

Because the District does not have the jurisdiction to directly implement improvements for local and state intersections, the TIA expressly recommends working with the appropriate jurisdictional entity (e.g., the City of Menlo Park) to implement these feasible improvements and contribute the District's "fair share" of the cost of the improvements. "Fair share" contributions G6

are a recognized and standard method of mitigating traffic impacts.[1] As the court explained in *Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, at p. 1188:

> A single project's contribution to a cumulative impact is deemed less than significant if the project is required to implement or fund its "fair share" of a mitigation measure designed to alleviate the cumulative impact. (Guidelines, § 15130, subd. (a)(3).) Fee-based mitigation programs for cumulative traffic impacts—based on fair share-infrastructure contributions by individual projects—have been found to be adequate mitigation measures under CEQA. [citation omitted.]

G6 Cont.

But despite the clear recommendations in the TIA, established legal and local precedent, and common sense, the Draft EIR declares that the District "has determined that contributing a fair share of the cost of improvements for traffic signals, re-striping, reconfiguring, or re-converting exiting [*sic*] travel lanes, widening roads and travel lanes [*sic*], and developing alternative transportation infrastructure is inappropriate and infeasible[.]" Draft EIR at p. 4-26. The District advances four reasons why the recommended mitigation is "inappropriate and infeasible." None withstand close scrutiny.

G7

First, the District asserts that the school is expected to be in session from approximately 8:15 A.M. to 3:45 P.M., that the 3:45 end of school day is outside the traditional PM peak hour time period, and that it is "unlikely" that all project traffic would occur during the PM peak hour period even though that is what the TIA assumes. The District thus ignores its AM peak hour trips entirely – which occur in the middle of the AM peak period and trigger the need for mitigation - and speculates that most of its PM trips would occur within the 15-minute window "after the bell rings." No evidence is provided to support that claim.

G8

Second, the District claims that students would come from feeder and other schools within the District's attendance boundary, and thus "to some extent, some or many of the vehicle trips that would be generated by the proposed project are not new vehicle trips, but rather existing trips that are shifted from one school and vicinity to another." Draft EIR at p. 4-26. The Draft EIR then speculates that "these trips may already be impacting the regional intersections and roadway segments evaluated in the TIA." Id. This argument ignores the fact that the Project would shift trips into an area in Menlo Park where there is currently not a school, and that these

G9

[1] The Draft EIR also acknowledges that the City of Menlo Park has codified a Traffic Impact Fee (or "TIF") Program that is intended to help fund transportation improvements in the City. All projects in the City of Menlo Park are required to pay TIF fees to offset traffic impacts, and the payment of TIF fees is typically required on top of additional mitigations identified in an EIR. This is true of all of the EIR's referenced on page 4-25 of the Draft EIR, including the Facebook Campus project, the Menlo Gateway Project, and the Commonwealth Corporate Center Project. The Draft EIR is not entirely clear on whether the District is proposing to pay the City's TIF fees, but implies that this answer is "no."

trips are new trips to the area. And there is no data or evidence supporting the Draft EIR's speculation that these trips "may" be impacting the same regional intersections and roadway segments evaluated in the TIA. While that may be the case, no evidence in the record appears to support the claim. The District cannot rely on unsupported speculation as the basis to reject feasible, standard mitigation measures. The District has the raw data available to conduct an analysis of where its students would come from; if it desires to minimize its mitigation obligations under CEQA, it needs to "show its work" and provide substantial evidence supporting its conclusions. G9 Cont.

Third, the District speculates that "the residential land uses where the school-related vehicle trips originate may have already been subject to a developer or traffic impact fee program intended to address transportation impacts." Draft EIR at p. 4-26. Even if there were evidence that some of the District's students are living in newly constructed residential units that paid impact fees (and there is none), the payment of impact fees for new residential construction does not mitigate traffic impacts caused by the Project. Nor is any evidence provided regarding how many residential units have been approved in Menlo Park, or whether any students are known to live in those units. G10

Fourth, the District argues that it should not be subject to standard cost-sharing mitigation because it "cannot act as the primary authority to guarantee the timely and successful implementation, effectiveness, and monitoring of any infrastructure improvement funded through a cost-sharing program." Draft EIR at p. 4-26. Cost-sharing programs are routinely used to mitigate traffic impacts. See e.g., *City of Marina v. Bd. of Trustees of the California State Univ.* (2006) 39 Cal.4th 341, 367 ("CEQA does not, however, as we have explained, limit a public agency's obligation to mitigate or avoid significant environmental effects to effects occurring on the agency's own property. . . if the [lead agency] cannot adequately mitigate or avoid [the project's] off-campus environmental effects by performing acts on the campus, then to pay a third party . . . to perform the necessary acts off campus may well represent a feasible alternative."). This is precisely why the District's own transportation consultant recommended that the District "work with appropriate jurisdictional entity (e.g., the City of Menlo Park) to implement these potentially feasible improvements and contribute a fair share of the cost of the improvement." Draft EIR at p. 4-25. G11

Instead, the District proposes "soft" measures that, by the Draft EIR's own admission, "would not fully offset project trips" and "may yield no trip reductions if they are found not to be feasible by the school. " Id. at p. 4-26. These measures include: (i) TRA-1A: prepare and implement a Transportation Demand Management ("TDM") program for students, faculty and staff, but with no enforcement mechanism or performance standard apart from a "goal" of 30 percent mode split, (ii) TRA-2B: conduct a travel mode survey to ascertain the effectiveness of the TDM program, but again without any enforcement mechanism or performance standard, and (iii) TRA-IC: evaluate the feasibility of establishing a dedicated SamTrans bus route or shuttle service for the school. Each of these measures constitutes "deferred" mitigation, which is G12

expressly prohibited by CEQA. *See Communities for a Better Env't v. City of Richmond* (2010) 184 Cal. App. 4th 70, 92 (holding that "[a]n EIR is inadequate if "[t]he success or failure of mitigation efforts ... may largely depend upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR" [citations omitted]); *see also San Joaquin Raptor Rescue Ctr. v. Cty. of Merced* (2007) 149 Cal.App.4th 645, 670 (invalidating a mitigation measures that stated only a "generalized goal" without any "specific criteria or standard of performance" on the grounds that it "leaves the reader in the dark" about steps will be taken, or what "specific criteria or performance standard will be met"). These measures fail to satisfy CEQA's requirement that mitigations be definite, effective, and enforceable. G12 Cont.

In sum, the Draft EIR and TIA recommend effective, feasible mitigation cost-sharing measures to reduce the Project's traffic impacts to less than significant levels. The District's refusal to adopt these recommendations as "infeasible" is not supported by substantial evidence. And the proposed alternative mitigations do not constitute effective or lawful measures because they rely on future actions that have not yet been formulated or subject to analysis and review, and contain no enforcement mechanisms or performance standards. G13

CEQA, and its requirements for "substantial evidence," demand more. The District has a duty to revise the Draft EIR to incorporate feasible, effective mitigation measures that comply with CEQA.

3. The Draft EIR Fails to Adequately Mitigate Impacts Associated with Insufficient Parking.

The Draft EIR's analysis of parking impacts is similarly flawed. According to the TIA, the Project would require a minimum of 71 parking spaces (36 for students and 35 for staff/faculty) based on ITE trip generation rates. Because the TIA acknowledges that this number is misleading, it evaluates existing parking demand at East Palo Alto High School and Everest High School, and concludes that a parking generation rate of 0.17 spaces per student would apply; thus the Project "could require up to 74 parking spaces (for both students and staff). If the rate were applied only to students, the project could require up to 103 students [sic; read: spaces] (68 for students and 35 for staff)." [2] Although the cited language is conflicting, it appears that the G14

[2] East Palo Alto High School is located within a residential area and approximately 35% of its students walk, ride their bike, or take public transportation to school. As the Draft EIR makes clear, the Project site is located in an industrial area where bike, pedestrian and transit facilities are all lacking. The TIA recognizes as much, observing that "because the proposed school site is located within an industrial area, the percentage of students walking/biking/taking transit may be lower." TIA, at p. xxi. The Draft EIR also states that East Palo Alto High School and Everest High School "report that their existing parking supply was sufficient," but fails to explicitly acknowledge directly that neither is at capacity. Draft EIR at p. 4-30. Accordingly, the Draft

accurate parking demand is 103 parking spaces.[3] Parking for visitors, which would occur as part of the school's regular operations, appears to be ignored entirely. The supposition that decreased on-site parking supply at nearby high schools should be an indicator of demand is also false, as it ignores the likely circumstance that staff, students, and visitors are parking in nearby neighborhoods. The business park environment surrounding the proposed school will not provide an off-site parking supply. G14 Cont.

Because the Project only proposes 50 parking spaces, (i.e. less than half of what is required) the Draft EIR acknowledges that the Project "may not provide sufficient on-site parking for the proposed student enrollment and staff; the estimated deficiency could be between 21 to 53 spaces." Draft EIR at p. 4-30. It goes on to identify potential environmental impacts arising from this deficiency including air quality and noise emissions, water quality effects, and traffic impacts, concluding that these impacts are potentially significant. G15

As a consequence, the Draft EIR was required to analyze feasible mitigation measures that would reduce these impacts to less-than-significant levels. In this regard, the Draft EIR fails.

Mitigation Measure TRA-3A purports to require the District to "maximize on-site parking," and states that this "may be accomplished by designing the eastern perimeter of the site to accommodate daily parking for students/staff or short-term parking for visitors (outside of school drop off and pick-up periods)." No information or analysis is provided about whether the Project could include more than the 50 parking spaces proposed, nor is there any discussion of whether the proposed "design" solution would be feasible or effective. No detail is provided at all. G16

Mitigation Measure TRA-3B states that the Project "shall engage local businesses and other land uses to identify underutilized or vacant parking areas that could be used by school staff and/or students," and then "once areas have been identified, the school shall prepare and implement a formal, written off-campus policy outlining areas where staff and students can find available off-campus parking." Again, this is a classic case of deferred mitigation. The Draft EIR assumes, without support, that underutilized or vacant parking areas exist to fulfill the Project's parking demand. No performance standards are provided that would demonstrate the G17

EIR's assumption that a parking generation rate of 0.17 would be adequate to serve the Project also lacks evidentiary support.

[3] The TIA states that applying the 0.17 generation rate, "it is estimated that at full capacity (400 students and 35 staff/faculty), the proposed school project would need to provide approximately 74 parking spaces to serve its projected demand." TIA, at p. 106. Applying the 0.17 rate to 400 students yields a parking demand of 68 spaces, which in addition to 35 spaces for faculty/staff, would equate to a demand for 103 spaces.

effectiveness of the proposed measure. Whether this measure would mitigate the Project's parking impacts is entirely speculative and unsupported by substantial evidence. G17 Cont.

Mitigation Measure TRA-3C would require the District to "coordinate" with the City of Menlo Park on parking prohibitions on Jefferson Drive, with the "goal being to permit temporary, short-term, school-related parking that can be used for visitors, parent-teacher conferences, etc." The Draft EIR then assumes, without any evidentiary support, that the required "coordination" would be effective, and declares that the proposed mitigation "*would* [make] short-term, on-street parking available for visitors." Draft EIR at p. 4-31. That assumption is not supported by substantial evidence. Indeed, the Draft EIR acknowledges that the City of Menlo Park is considering prohibiting parking on Jefferson Drive in the near future. G18

"Formulation of mitigation measures should not be deferred until some future time." CEQA Guidelines § 15126.4(a)(1)(b). As the court held in *Communities for a Better Env't v. City of Richmond* (2010) 184 Cal.App.4th 70, 92 "[a]n EIR is inadequate if "[t]he success or failure of mitigation efforts ... may largely depend upon management plans that have not yet been formulated, and have not been subject to analysis and review within the EIR." *Id.* at 92 (citations omitted). "Numerous cases illustrate that reliance on tentative plans for future mitigation after completion of the CEQA process significantly undermines CEQA's goals of full disclosure and informed decision making; and consequently, these mitigation plans have been overturned on judicial review as constituting improper deferral of environmental assessment." *Id.* Here, the District's proposed mitigation measures similarly rely on the development and implementation of plans long after the CEQA process is complete. G19

The Draft EIR's conclusion that with implementation of these measures, parking-related impacts would be rendered less-than-significant is therefore unsupported. At a minimum, the Draft EIR needs to be recirculated to address feasible and effective mitigations, and then determine whether the impacts would remain significant and unavoidable. Because "mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments" (CEQA Guidelines § 15126.4(a)(2)), the revised EIR should also consider mitigation measures such as recording conditions, covenants and restrictions that tie school occupancy levels to the District's ability to demonstrate (through joint or shared parking agreements, for example), that it has the legal rights to adequately "self park." It is a standard practice that projects that do not meet the required parking demand be required, through a binding measure such as a conditional development or use permit, to mitigate that deficiency through programmatic changes or parking agreements with other nearby entities in perpetuity.

4. The Draft EIR's Discussion of Pedestrian/Bicycle/Vehicle Conflicts is Legally Deficient, Relying Upon Impermissible "Deferred Mitigation."

The Draft EIR's analysis of potentially dangerous conflicts between pedestrians, bicyclists and vehicles suffers from similar defects. G20

The Draft EIR recognizes that there are insufficient sidewalks in the vicinity of the site and no bicycle facilities. The TIA explains that the absence of these facilities "could discourage students from walking and/or biking to school, or could force them to walk along property frontages without sidewalks, undeveloped roadway shoulders, and/or within the street." TIA at p. xix. Because the potential conflicts related to safe student travel and site ingress/egress are considered potentially significant impacts, the Draft EIR is required to evaluate feasible and effective mitigations to reduce these impacts to less than significant levels. Like its treatment of parking mitigation measures, the Draft EIR's analysis of mitigation measures for safe student travel is inadequate. G20 Cont.

Mitigation Measure TRA-2A states that the District, "in coordination with the City of Menlo Park, shall prepare a safe Routes to Schools Map" to define the safest routes between adjacent residential areas and the Project site. The Draft EIR therefore assumes that safe routes exist, but this assumption is not supported by substantial evidence. Nor is there any evidence that providing a map and providing it to parents and students once a year will constitute effective mitigation. G21

Mitigation Measure TRA-2B relies upon the future preparation of a policy outlining student loading and unloading procedures for the school, but it is unclear how this future policy constitutes effective mitigation for safe student travel and pedestrian/bicycle/vehicle conflicts. Instead, the measure appears to address a separate problem identified in the Draft EIR related to "improper and/or illegal student loading and unloading at or near adjacent businesses and their associated parking lots," the potential for which is deemed to be "low." Draft EIR at p. 4-28. Not only is that conclusion erroneous because the Project's lack of sufficient parking means that future students are likely to engage in improper loading and unloading, but there is no evidence suggesting that the proposed mitigation would be effective in deterring this problematic behavior. G22

Finally, Mitigation Measure TRA-2C would require the District to coordinate with appropriate stakeholders "if and when" the City of Menlo Park establishes a Transportation Management Association ("TMA") for the area to "assess and recommend changes to signage, pedestrian facilities, and other solutions that address pedestrian and bicycle safety concerns." Draft EIR at p. 4-30. This measure similarly relies upon an uncertain future process, and further assumes that "recommending" changes to "signage, pedestrian facilities, and other solutions" constitutes effective mitigation. But, "recommendations" are not actions. And the City of Menlo Park has not yet initiated the process of creating a TMA. Effective mitigation measures may not rely upon future actions by separate governmental authorities and idle speculation about future efforts at "coordination." G23

The Draft EIR's discussion of potential conflicts between vehicles, bicyclists and pedestrians, as well as student loading and unloading, is not supported by substantial evidence, and the identified mitigation measures fall short of what CEQA requires. G24

5. The Draft EIR Improperly Determines that Impacts on Greenhouse Gas Emissions are Less than Significant.

CEQA requires that an EIR must not only identify a projects' potential impacts, but must also provide "information about how adverse the impacts will be." *Santiago County Water Dist. v. County of Orange* (1981) 118 Cal.App.3d 818, 831. The lead agency may deem a particular impact to be insignificant only if it produces rigorous analysis and concrete substantial evidence justifying the finding. K*ings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692

The Draft EIR's analysis of greenhouse gas emissions fails to meet this standard. The Draft EIR relies upon screening criteria developed by BAAQMD in 2011 that suggest high school project's less than 49,000 square feet would not have potentially significant GHG impacts. The Project calls for the construction of a 45,000 square foot facility, which is only slightly below the screening criteria threshold. In addition, BAAQMD's screening criteria only address emissions from "electrical generation, solid waste and water conveyance." **[cite]** The BAAQMD Guidelines go on to state that if a project "has other significant sources of GHG emissions not accounted for in the methodology described above, then the screening criteria should not be used." Page 3-1. Due to the need for faculty, students and visitors to drive to the site, the Project will generate additional greenhouse gas emissions from transportation. Yet the Draft EIR contains no analysis of vehicles miles traveled, daily trips caused by the Project, nor any analysis whatsoever of the additional emissions caused by students, visitors, and faculty driving to and from the site. Because the EIR fails to provide "rigorous analysis and concrete substantial evidence" justifying its finding that GHG impacts would be less than significant, additional analysis is required. A recirculated EIR should be prepared quantifying emissions from transportation, including an analysis of the Project's VMT. G25

6. The Draft EIR's analysis of Hazards and Hazardous Materials Impacts is Inconsistent with the Underlying Technical Documentation.

Lastly, the Draft EIR's analysis of hazards and hazardous materials impacts is also deficient. For example, Page 8-4 of the Draft EIR discusses volatile organic compounds (or "VOCs") and explains that "VOCs are carbon compounds such as chloroform and naphthalene that participate in atmospheric photochemical reactions and are commonly encountered at waste sites." The Draft EIR then states that "VOCs at the proposed school site were either not detected or detected at levels that did not exceed applicable screening criteria." Yet, page 5 of the Preliminary Environmental Assessment ("PEA") prepared for the Project discloses that "Chloroform was detected in 2 of 8 sub-slab soil vapor samples at concentrations of 5.5 µg/m3 (SV-1) and 18 µg/m3 (SV-5); its calculated screening level is 2.4 µg/m3." The PEA also discloses that "Benzene concentrations in the eight subsurface soil vapor samples ranged from 5 to 220 µg/m3 with two samples exceeding its calculated screening level of 97 µg/m3." The Draft EIR's statement that VOC's were either not detected or detected at levels that did not exceed applicable screening criteria is incorrect. The Draft EIR therefore needs to be recirculated. G26

7. Conclusion

As indicated at the outset, our primary concerns relate to whether the Project is feasible and would operate well given its location in the heart of what is currently an industrial and office district. Our review of the Draft EIR confirmed our suspicions, and we therefore encourage the District to (i) revise and recirulate the Draft EIR and consider mitigation measures that are feasible and consistent with CEQA's mandate, and (ii) re-consider the decision to continue forward with the Project at the proposed location. We do not believe it is a responsible use of public funds to pursue the development of a new school in an area that is not suitable or equipped for it. The risk is not worth it. G27

Although the District has unquestionably invested time and resources into the project, these sunk costs should not be factored into the District's consideration of whether to continue to pursue the Project at the proposed location. As indicated above, our client is also more than willing to collaborate with the District to identify alternative locations and work towards a more successful outcome.

Sincerely,

Frank R. Petrilli

cc: David D. Bohannon
Timothy A. Tosta

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4.7 RESPONSE TO COMMENTS FROM ARENT FOX

The SUHSD received 27 comments from Frank Petrilli, Associate, Arent Fox LLP, Attorneys at Law. These comments were submitted on behalf of its client, the Bohannon Development Corporation, and were generally related to the adequacy of the Draft EIR and its analysis of the proposed project's traffic, greenhouse gas, and hazards and hazardous materials impacts.

Comment G1: Arent Fox notes its client's support for the development of a new school in the mid-peninsula area, but cites the school's location as a problem because the project would adversely impact adjacent businesses and create safety and other impacts for students.

> *Response to Comment G1:* Comment noted. The SUHSD appreciates the expression of support for the development of a new school in the mid-peninsula area. The SUHSD notes that Draft EIR section S.8 identifies the suitability of a school in an industrial / commercial portion of the City of Menlo Park as an area of controversy; however, the SUHSD considers the proposed site suitable for school development for the reasons outlined in Response to Comment B1. The Draft EIR adequately discloses the presence and the nature of the site's surrounding businesses and other land uses and fully evaluates the potential adverse environmental impacts associated with the development of a school in this part of the city. This is explained in more detail in Response to Comments G2 to G27 below.

Comment G2: Arent Fox expresses its understanding of the difficulty the SUHSD faces in finding suitable locations to meet the SUHSD's increases in enrollment and states its client is willing to work cooperatively with the SUHSD to identify alternative school locations.

> *Response to Comment G2:* Comment noted. The SUHSD appreciates the expression of understanding for the challenges the SUHSD faces when siting a new school and looks forward to working cooperatively with project stakeholders to address and resolve potential issues associated with the project.
>
> The SUHSD also notes, that, in accordance with CEQA and the CEQA Guidelines, Draft EIR Chapter 13 described a range of reasonable alternatives to the proposed project, including the construction of a new, comprehensive high school campus and the construction of a small high school at a different site. The Draft EIR explains the SUHSD searched for areas where new high school facilities could be developed. The search found one potentially feasible area for a new, comprehensive high school (the Salt Works restoration area of Redwood City) and two economically viable properties potentially capable of supporting smaller high school facilities. As explained in Draft EIR section 13.2.1, the construction of a new, comprehensive high school campus was found infeasible for cost reasons; this alternative would also not avoid or substantially lessen the significant and unavoidable traffic impacts of the project. As explained in section 13.4, the SUHSD expended more than $12.5 million dollars to purchase two properties for school development purposes, and it is not feasible for the SUHSD to purchase additional land at this time. Thus, the only alternative site for a small high school is the property at 535 Old County Road, San Carlos, which the SUHSD acquired in 2015. As described in section 13.4 of the Draft EIR, development of this site would not avoid or substantially lessen the proposed project's impacts, and is likely to result in more severe aesthetic, hazards, and noise impacts than the Menlo Park Small High School Project. Thus, the Draft EIR concludes development of the proposed project is the environmentally superior alternative

Comment G3: Arent Fox generally states there are significant problems with the adequacy of the Draft EIR, including the improper rejection of feasible traffic mitigation measures, a deficient analysis of parking impacts and safety conflicts, and inadequate analysis of potential GHG and hazards and hazardous materials impacts. Arent Fox states the Draft EIR fails to fully and accurately inform decision makers of the project's potential environmental impacts and must be recirculated.

Response to Comment G3: Comment noted. The Draft EIR, as revised by this Final EIR, adequately discloses and evaluates the potential environmental effects of the proposed project and provides substantial evidence for the EIR's findings regarding the significance of potential project impacts and feasible mitigation measures. Consequently, the EIR fully and accurately informs the public and project decision makers on the project's environmental effects, complies with CEQA and the State CEQA Guidelines, and does not need to be circulated. See Response to Comments G4 to G27 for response to specific comments raised on the adequacy of the EIR.

Comment G4: Arent Fox provides general background information on the purposes of CEQA and recirculation of an EIR, notes the Draft EIR fails to analyze and consider significant environmental impacts and mitigation measures pertaining to the proposed project, and states the Draft EIR must be recirculated.

Response to Comment G4: The SUHSD notes Draft EIR sections 1.2, 1.3, and 1.4 provide information on the SUHSD's role as the CEQA Lead Agency for the project, the intended uses of the EIR, and EIR scoping information. The Draft EIR sufficiently analyzes and considers the proposed project's potentially significant environmental effects and feasible mitigation measure that could avoid or lessen those effects. Comment G4 does not raise any specific points regarding new significant impacts, substantially more severe environmental impacts, or feasible project alternatives or mitigation measures that the SUHSD has declined to implement. Thus, consistent with CEQA Guidelines section 15088(a), the Draft EIR does not need to be re-circulated. See Response to Comments G5 to G27 for responses to specific comments raised on the adequacy of the EIR and need for recirculation.

Comment G5: Arent Fox generally summarizes Draft EIR information on the proposed project's potential traffic impacts and the recommendations provided in the TIA to address potential traffic impacts contributed to or caused by the project.

Response to Comment G5: The summary of the Draft EIR's discussion of the project's potential traffic impacts and TIA recommendations is accurate; however, the SUHSD notes it has revised the TIA prepared for the project based on comments from the City of Menlo Park and San Mateo County (see sections 2.3, 4.2 and 4.3 of this Final EIR.

Comment G6: Arent Fox notes the TIA recommends the SUHSD work with the appropriate jurisdictional entity to implement feasible improvements and contribute the SUHSD's "fair share" of the cost of these improvements. Arent Fox notes "fair share" contributions are a recognized and standard method of mitigating traffic impacts, citing the California Supreme Court's 2005 decision in *Anderson First Coalition v. City of Anderson*.

Response to Comment G6: Arent Fox correctly identifies that the TIA recommends the SUHSD work with the appropriate jurisdictional entity to implement feasible improvements and contribute a fair share of the cost of traffic improvements identified in the TIA and other publically available documents. While the California Supreme Court,

in *Anderson First Coalition v. City of Anderson,* acknowledged that fee-based mitigation programs for cumulative traffic impacts have been found to be adequate mitigation measures, it has also stated that such fees, to be adequate, "must be part of a reasonable plan of actual mitigation that the relevant agency commits itself to implementing"[10]. Thus, the payment of fees to mitigation traffic impacts is not a de facto feasible mitigation measure for all projects. In addition to the need for mitigation fees to be part of a reasonable plan, CEQA and the state CEQA Guidelines define "feasible" as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors (Public Resources Code (PRC) section 15364)." In addition, CEQA requires that mitigation measures be roughly proportional to the impacts of the project (PRC section 15126.4(a)(4)(b)).

The SUHSD directs Arent Fox to section 3.4 of this Final EIR, which includes a revised discussion on the feasibility of fair share contributions to recommended traffic infrastructure improvements. In this revised discussion, the SUHSD amplifies the explanation of the factors that affect the feasibility of a fair share contribution towards infrastructure improvements, including whether a voluntary payment to improve transportation-related infrastructure would successfully and substantially lessen the project's traffic impacts in a reasonable period of time. As explained in the revised text, there is considerable uncertainty regarding whether or not a voluntary payment to the city or another agency to improve transportation-related infrastructure would meet these considerations. But while such uncertainty is important to consider and factor into the calculation of what is an appropriate voluntary payment, it does not necessarily mean such a payment is infeasible as defined by CEQA. Accordingly, the SUHSD has concluded that the negotiation of a voluntary payment to the city's TIF Program is a feasible mitigation measure. This requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

The SUHSD also notes the revised text provides a discussion of factors that need to be considered when determining the appropriate funding contribution for the project. These include: 1) the degree to which there is a reasonable relationship or nexus between the proposed project and a fair share contribution towards infrastructure projects that have been identified as part of the city's General Plan Update, which would add more than 5,000 residential units and 20,000 employees to the Bayfront Area; 2) the degree in which a voluntary payment for permanent infrastructure is proportionate to a project that will have PM peak hour, weekday/weekend, and seasonal fluctuations in traffic; and 3) the trip reduction benefits associated with Mitigation Measures TRA-1A, TRA-1B, TRA-1C, and TRA-1D.

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[10]The California Supreme Court, in *City of Marina v. Board of Trustees of the California State University (2006) 39 Cal 4th 341*, reinforces this point, stating, "To be clear, we do not hold that the duty of a public agency to mitigate or avoid significant environmental effects (Pub. Resources Code, § 21002.1, subd. 35b)), combined with the duty to ask the Legislature for money to do so (id., § 21106), will always give a public agency that is undertaking a project with environmental effects shared responsibility for mitigation measures another agency must implement. Some mitigation measures cannot be purchased, such as permits that another agency has the sole discretion to grant or refuse. Moreover, a state agency's power to mitigate its project's effects through voluntary mitigation payments is ultimately subject to legislative control; if the Legislature does not appropriate the money, the power does not exist.

Comment G7: Arent Fox states the four reasons provided in the Draft EIR for why the SUHSD has determined that contributing a fair share cost of infrastructure improvements are inappropriate and infeasible do not withstand scrutiny.

Response to Comment G7: The SUHSD notes that the four bullet points outlined on page 4-26 of the Draft EIR were intended to provide information related to whether or not infrastructure improvements would be effective at avoiding or substantially lessening the proposed project's traffic impacts. The SUHSD directs Arent Fox to section 3.4 of this EIR, which revises the EIR's discussion regarding the feasibility of contributing a fair share portion for infrastructure improvements, as well as Responses to Comments G-8 to G-11. As previously indicated in Response to Comment G6, the SUHSD has concluded that the negotiation of a voluntary payment to the city's TIF Program is a feasible mitigation measure, and this requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

Comment G8: Arent Fox purports the SUHSD "ignores" its AM peak hour trip impacts and comments the Draft EIR provides no evidence when it "speculates" that most of the school's PM trips would occur within the 15-minute window "after the bell rings".

Response to Comment G8: The SUHSD does not "ignore" its AM peak hour trip impact. The discussion under Draft EIR Impact TRA-1 clearly describes the amount of AM peak hour trips the project would produce and Tables 4-13 to 4-16 summarize both AM and PM peak hour impacts resulting from project trips. The first bullet point on page 4-26 of the Draft EIR 4-26 states the proposed school would "be in session from approximately 8:15 AM to 3:45 PM". Since the start of the school day would occur in the middle of the AM peak hour period (7 AM to 9 AM, as defined in the EIR on page 4-11), school trips would clearly impact AM peak hour LOS operations and, therefore, infrastructure improvements could clearly avoid or lessen these impacts. Thus, no further discussion of AM peak hour trips was provided in this bullet point for this reason. In addition, the SUHSD notes the Draft EIR explains the city's Transportation Impact Fee (TIF) Program is based on the level of PM peak hour trips a project produces, and not AM peak hour trips (Draft EIR page 4-25).

The first bullet point on page 4-26 of the Draft EIR then states (emphasis added), "The 3:45 PM end of school day is outside the traditional PM peak hour time period (4 PM to 6 PM). *Even though the SUHSD has conservatively assumed that all project traffic would occur during the PM peak hour period, this is unlikely to be the case*". The SUHSD notes the Draft EIR does not "speculate" that "most" PM peak hour trips would occur before the peak hour, as Arent Fox purports. Rather, the Draft EIR presumes the exact opposite, conservatively assuming all project traffic would occur during the PM peak hour period. This provides a conservative analysis of potential impacts stemming from the project; however, since the school day would end 15-minutes before the PM peak hour period begins, the Draft EIR does acknowledge that it is "unlikely" that all project traffic would occur during the PM peak hour period. The Draft EIR acknowledges this important point for two reasons: 1) As described on page 4-25 of the Draft EIR and section 2.5 of this Final EIR, the city's TIF, the payment of which would constitute a fair share contribution to infrastructure improvements, is based on PM peak hour trip rates; and 2) infrastructure is a permanent solution for school traffic which inherently ebbs and flows with enrollment patterns, session schedules, etc. (see section 3.4 of this Final EIR).

The SUHSD cannot quantify the amount of project trips that would occur "after the bell rings" but before the PM peak hour period begins for the proposed school because the student demographics, after-school programs, and daily operating patterns of the school are not yet established. But, it is reasonable to assume that some project traffic would leave the school site by 3:50 (five minutes after school ends) and pass through the intersections evaluated in the TIA before 4 PM. This is a reasonable assumption because: 1) Almost all intersections evaluated in the TIA are located within 1.25 road miles of the school site (the exception being Marsh Road and Middlefield Road, which is approximately 1.9 road miles from the school site); and 2) A passenger vehicle travelling at an average speed of 20 miles per hour (5 to 15 mph less than the speed limit on most roads in the vicinity of the proposed school) can traverse 3.3 miles in 10 minutes.

In addition, the traffic engineering firm that prepared the TIA for the project and conducted the trip counts at Everest High School, which formed the basis for the proposed project's trip generation characteristics, has confirmed that the trip counts conducted at Everest High School show a substantial difference in the amount of trips occurring in the first 15 minutes after the end of the school day, as compared to the time period 15 to 30 minutes after the school day, although it is noted Everest High School ends its normal school day at 3:15 PM (Hexagon 2016a).

Nonetheless, as previously indicated in Response to Comment G6, the SUHSD has concluded that the negotiation of a voluntary payment to the city's TIF Program is a feasible mitigation measure, and this requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

Comment G9: Arent Fox states the Draft EIR does not provide data or evidence to support the Draft EIR's assertion that the proposed project's trips may already be impacting the intersections and roadway segments evaluated in the TIA and notes the SUHSD has the raw data to conduct an analysis of where its students would come from.

Response to Comment G9: The SUHSD has deleted this text from the Draft EIR and revised the Draft EIR's discussion regarding the factors affecting the feasibility of traffic mitigation. The SUHSD directs Arent Fox to section 2.3.4 and 3.4 of this Final EIR, which provide additional information regarding SUHSD enrollment patterns and clarify and augment the Draft EIR's discussion of potential traffic impacts and mitigation measures, and notes the following:

- As a point of clarification, the SUHSD does not have the ability at this time to conduct a refined analysis of where, exactly, the proposed school's students would come from. This is because the proposed school would have an open enrollment and lottery system that the SUHSD has not initiated. The open enrollment and lottery system would potentially allow students from anywhere within the SUHSD's geographicl boundaries to attend the Menlo Park Small High School. Although the school would have an open enrollment system, the Draft EIR (page 2-10) does explain that the SUHSD anticipates the proposed school would primarily serve students from the southern part of the SUHSD (i.e., Redwood City, Menlo Park, and East Palo Alto). This is because similar academic programs and curricula are available at other schools in the north part of the District, which would be closer to students living in the northern part of the District (e.g., Belmont, San Carlos, Redwood Shores).

- The SUHSD has provided data that shows more than 600 students currently attend Menlo-Atherton High School (MAHS) and Sequoia High School (SHS), but live in neighborhoods where the most likely vehicular route of travel to these schools include Marsh Road, Bay Road, Middlefield Road, and/or Willow Road (see section 2.3.4 of this Final EIR). These vehicle trips are currently on the roadway system, would continue to be on the roadway system, and thus are part of the existing, near-term, and cumulative traffic conditions in which the proposed project is set. In 2018 and beyond, some of the students that live in these areas could choose to attend the Menlo Park Small High School ***instead*** of MAHS, SHS, or another school. As indicated in section 2.3.1 of this Final EIR, data from Everest High School indicates nearly 50% and 76% of the school's students live within a two-mile or four-mile radius of the school. This supports the Draft EIR's position that the proposed Menlo Park Small High School would not result in new trips on major arterial and other regional roadways.

Comment G10: Arent Fox states the Draft EIR does not provide data or evidence to support the Draft EIR's assertion that some of the students that could attend the Menlo Park Small High School would come from residential projects that have been subject to developer or traffic impact fees intended to address transportation impacts. Arent Fox states that even if this were true, the payment of fees by a new residential construction project does not mitigate traffic impacts caused by the proposed project.

Response to Comment G10: Comment noted. The SUHSD has deleted this text from the Draft EIR and revised the Draft EIR's discussion regarding the factors affecting the feasibility of traffic mitigation. The SUHSD directs Arent Fox to section 2.4 and 3.4 of this Final EIR, which provide additional information on the city's General Plan Update and clarify and augment the Draft EIR's discussion of potential traffic impacts and mitigation measures, and notes the following:

- The SUHSD does not have data that demonstrates its existing students come from residential developments that were subject to city's TIF Program. In fact, since the TIF Program was adopted by the city in 2009, and the city has not had substantial residential development since 2009, it is unlikely that existing SUHSD students come from residential developments that were subject to the city's TIF Program. But the city's General Plan Update does plan for an increase of approximately 5,300 housing units, 13,000 residents, and up to 1,100 new SUHSD students, and the General Plan Update EIR does require new development under the plan to contribute its fair share toward identified traffic impacts (City of Menlo Park 2016). Thus, in the future, a student residing in one of these new residential units that attend the Menlo Park Small High School would be coming from a development that has contributed to the city's TIF Program. As explained in the next bullet, it is even likely that the TIF paid by the developer was used to mitigate an intersection or roadway facility in the city's Bayfront Area in which the proposed project is located.
- As indicated in section 2.4.2 of this Final EIR, the traffic impacts identified in the city's General Plan Update EIR are based on the C/CAG model, which specifically identifies home-based school vehicle trips as one of six trip purpose categories contained in the mode. Thus, the distribution of trips in the General Plan Update has considered vehicle trips going from home to school, and these

trips form part of the impact evaluation contained in the city's General Plan Update Draft EIR.

Nonetheless, as previously indicated in Response to Comment G6, the SUHSD has revised the Draft EIR's discussion regarding the feasibility of contributing a fair share portion for infrastructure improvements and included a requirement to consult and negotiate with the city on a voluntary payment to the city's TIF Program. This requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

Comment G11: Arent Fox comments that the Draft EIR erroneously argues the SUHSD should not be subject to standard cost-sharing programs because it does not have the authority to undertake the infrastructure improvement. Arent Fox states cost-sharing programs are routinely used to mitigate traffic impacts, citing the California Supreme Court's decision in *City of Marina v. Board of Trustees of the California State University*, and notes that this is precisely why the SUHSD's transportation consultant recommended the SUHSD work with the appropriate jurisdictional entity and contribute a fair share of the cost of recommended infrastructure improvements.

Response to Comment G11: Comment noted. As a point of clarification, the Draft EIR does not state or argue the SUHSD should not be "subject" to a cost-sharing program. The fourth bullet on page 4-26 of the Draft EIR states (emphasis added), "The District cannot act as the ***primary*** authority to guarantee the timely and successful implementation, effectiveness, and monitoring of any infrastructure improvements funded through a cost sharing program." The Draft EIR then identifies that this lack of primary authority for infrastructure improvement is just one of the reasons why (emphasis added), "funding roadway improvements, even on a cost-sharing basis, is not considered to be an ***effective*** mitigation measure for potential impacts identified in the TIA (Draft EIR pg. 4-26). Thus, the Draft EIR only concluded fees are not an effective mitigation measure for the project. As previously indicated in Response to Comment G6, the SUHSD has revised the Draft EIR's discussion regarding the feasibility of contributing a fair share portion for infrastructure improvements and included a requirement to consult and negotiate with the city on a voluntary payment to the city's TIF Program. This requirement has been added to the EIR as Mitigation Measure TRA-1E (see section 3.4 of this Final EIR).

Comment G12: Arent Fox purports that Draft EIR Mitigation Measures TRA-1A, TRA-1B, and TRA-1C constitute deferred mitigation and do not satisfy CEQA's requirement that mitigation be definite, effective, and enforceable.

Response to Comment G12: Comment noted. Draft EIR Mitigation Measures TRA-1A, TRA-1B, and TRA-1C are not deferred mitigation because each of these measures contains specific actions that must be completed by specific times. Furthermore, as a point of clarification, CEQA does not require that mitigation be "definite", only that there be a reasonable plan for mitigation (Save Our Peninsula Committee v. Monterey Bd. of Supervisors, supra, 87 Cal.App.4th 99 2001). Nonetheless, the SUHSD directs Arent Fox to section 3.4 of this Final EIR, which contains revisions to Mitigation Measures TRA-1A, TRA-1B, and TRA-1C that clarify and amplify the timing, performance standards, and mitigation requirements the SUHSD has incorporated into the project. The SUHSD also notes it has incorporated additional mitigation measures into the project that require

the SUHSD to provide student bus service (Mitigation Measure TRA-1D) and negotiate a voluntary payment to the city's TIF Program (Mitigation Measure TRA-1E).

Finally, the SUHSD notes that all EIR mitigation measures would be enforced as part of the Mitigation Monitoring and Reporting Program (MMRP) CEQA requires the SUHSD adopt for the project, if the project is approved by the Board of Trustees. The proposed MMRP is included as Chapter 5 of this Final EIR.

Comment G13: Arent Fox states the Draft EIR's conclusion that contributing fair share costs to mitigate traffic impacts is infeasible is not supported by substantial evidence, Draft EIR Mitigation Measures TRA-1A, TRA-1B, and TRA-1C do not comply with CEQA, and the SUHSD must revise the Draft EIR..

Response to Comment G13: See Responses to Comments G6 to G12.

Comment G14: Arent Fox states the Draft EIR's analysis of parking impacts is flawed and summarizes Draft EIR information on the project's parking demand.

Response to Comment G14: Arent Fox's summary of the Draft EIR's parking analysis is generally accurate. The SUHSD notes the current parking deficit for the project is estimated to be between 13 and 45 spaces, and that parking for visitors could be provided via temporary on-site parking (see section 2.2.2 of this Final EIR). The SUHSD also notes revised Mitigation Measures TRA-3A and 3B require the SUHSD to limit and control both on- and off-site parking for the school. In addition, as explained in section 2.3.1 of this Final EIR, Everest High School has indicated off-site parking is available to meet additional demand on a regular basis; however East Palo Alto Academy has indicated that students, faculty, and staff generally do not use off-site parking regularly. The SUHSD directs Arent Fox to section 3.4 of this Final EIR, which includes a revised discussion and evaluation of the project's parking demand, potential parking deficits, indirect environmental effects associated with potential parking deficits, and mitigation measures pertaining to on- and off-site parking requirements.

Comment G15: Arent Fox states the Draft EIR has failed to analyze feasible mitigation measures pertaining to the project's parking deficit and the potential indirect environmental effect associated with this parking deficit.

Response to Comment G15: Comment noted. As a point of clarification, a shortage of parking is not in and of itself a physical change to the environment that requires evaluation under CEQA; however, Impact TRA-3 considers the indirect effects that could result from a parking shortage at the proposed Menlo Park Small High School. Arent Fox does not provide any specific comments on these indirect effects that require a response at this time.

Comment G16: Arent Fox comments there is no information in the Draft EIR to determine whether Draft EIR Mitigation Measure TRA-3A would be feasible or effective.

Response to Comment G16: Comment noted. Draft EIR Mitigation Measure TRA-3A required the SUHSD to maximize on-site parking at the proposed Menlo Park Small High School by designing the eastern perimeter of the site to accommodate additional daily and short-term parking. The SUHSD directs Arent Fox to section 2.2.2 of this Final EIR, which describes that the SUHSD has added eight permanent parking spaces to the site design, and would coordinate with the Menlo Park Fire Protection District to potentially add nine short-term, temporary parking spaces in the student loading / unloading lane. As

a result, the SUHSD has modified Mitigation Measure TRA-3A, as well as Mitigation Measures TRA-3B and TRA-3C (see section 3.4 of this Final EIR) to clarify and amplify the timing, performance standard, and mitigation requirements contained in Mitigation Measures TRA-3A, TRA-3B, and TRA-3C, which are designed to ensure that students, faculty, and staff do not spend substantial amounts of time searching for parking, thereby minimizing and/or avoiding the potential indirect effects associated with a shortage of parking.

Comment G17: Arent Fox purports that Mitigation Measure TRA-3B constitutes deferred mitigation and that there is no information in the Draft EIR to determine whether Draft EIR Mitigation Measure TRA-3B would be feasible or effective.

Response to Comment G17: Comment noted. As a point of clarification, the SUHSD notes it has not completed an exhaustive evaluation of potential off-site parking areas at this time because the proposed school would open with 100 freshman students and would not generate an appreciable demand for student parking until the 2020-2021 school year at the earliest (when the initial freshman class is in its junior year). Thus, the identification of available off-site parking areas at this point in time is considered premature given that approximately four years' time will pass between the preparation of the EIR and the actual need for off-site parking.

The SUHSD notes it has modified Mitigation Measure TRA-3A and clarified and amplified Mitigation Measure TRA-3B to provide for the quantification and enforceable control of on- and off-site parking (see section 3.4 of this Final EIR). These measures require the SUHSD to determine the amount of on- and off-site parking needed to meet student, staff, and faculty demand based on the final design of the project and the results of the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B. These measures also require the SUHSD to issue parking passes for on- and off-site parking availability. If sufficient off-site parking cannot be identified, the Menlo Park Small High School is required to expand its TDM Program and reduce student vehicle trips until demand matches available supply. Draft EIR Mitigation Measure TRA-3B, as revised, does not constitute deferred mitigation under CEQA because it provides clear timing, performance standards, and mitigation requirements that SUHSD has incorporated into the project for the purposes of reducing potential indirect effects associated with parking deficits.

Comment G18: Arent Fox comments that there is no information in the Draft EIR to determine whether Draft EIR Mitigation Measure TRA-3C would be feasible or effective at providing short-term on-street parking.

Response to Comment G18: Comment noted. As indicated in Response to Comment G15 to G17, the SUHSD has revised Mitigation Measures TRA-3A and TRA-3B to clarify and amplify the timing, performance standards, and mitigation requirements the SUHSD has incorporated into the project to address potential indirect effects associated with a potential parking deficit at the school (see section 3.4 of this Final EIR). These revised mitigation measures essentially require the SUHSD to obtain on- and off-site parking in an amount that matches demand, as determined by the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B. Mitigation Measure TRA-3C requires the SUHSD to coordinate with the city to provide temporary, on-street parking for school visitors, scheduled and unscheduled meetings, etc. As indicated in section 2.2.2 of this Final EIR, the SUHSD would coordinate with the Menlo Park Fire

Protection District to determine if nine short-term, temporary parking spaces could be provided specifically for visitor purposes in the school's student loading and unloading lane. Furthermore, any potential shortage of visitor parking, which would constitute a small percentage of the project's total parking demand, would clearly not result in indirect air quality or other effects that have the potential to be significant.

Comment G19: Arent Fox comments the Draft EIR's mitigation measures pertaining to parking rely on tentative, future plans and states the Draft EIR should be recirculated to address feasible and effective mitigation.

Response to Comment G19: As indicated in Response to Comment G15, a shortage of parking is not in and of itself a physical change to the environment that requires evaluation under CEQA; however, Impact TRA-3 considers the indirect effects that could result from a parking shortage at the proposed Menlo Park Small High School, including air quality, water quality, noise, and traffic (e.g., vehicles passing through an intersection multiple times while searching for parking). Arent Fox does not provide any specific comments on the indirect effects associated with a lack of parking, or any evidence that the EIR's mitigation measures would not reduce these effects to a less than significant level. The SUHSD directs Arent Fox to section 3.4 of this Final EIR, which includes a revised discussion and evaluation of the project's parking demand, potential parking deficits, indirect environmental effects associated with potential parking deficits, and mitigation measures pertaining to on- and off-site parking requirements. The SUHSD notes it has clarified and amplified the timing, performance standard, and mitigation requirements contained in Mitigation Measures TRA-3A, TRA-3B, and TRA-3C, which are designed to ensure that students, faculty, and staff do not spend substantial amounts of time searching for parking, thereby minimizing and/or avoiding the potential indirect effects associated with a shortage of parking.

Comment G20: Arent Fox summarizes Draft EIR information on potential conflicts between pedestrians, bicyclists, and vehicles and comments the Draft EIR's analysis of mitigation measures pertaining to this impact is inadequate.

Response to Comment G20: Arent Fox's summary of the Draft EIR's parking analysis is generally accurate; however, the comment does not raise any specific points on the adequacy of the EIR's evaluation of potential conflicts between pedestrians, bicyclists, and vehicles that need be responded to. The SUHSD notes, however, that the Draft EIR does adequately evaluate this potential impact. Draft EIR Impact TRA-2 explains the project would result in students walking, biking, and driving to school during AM and PM peak hours and that, regardless of the travel mode, "all trips would likely take the most direct route possible to Jefferson Drive and would converge on the proposed school site (Draft EIR page 4-28)." The Draft EIR notes that the existing roadway system generally lacks continuous pedestrian and bicycle facilities in the vicinity of the school, and explains why this condition could potentially lead to injuries, accidents, or near-misses. The Draft EIR notes such impacts are difficult to evaluate because the potential for this impact to occur "is contingent on specific intersection conditions and roadway volumes that would fluctuate daily and change over time, as well as the behaviors and attitudes of individual pedestrians, bicyclists, and motorists using the roadway system (Draft EIR page 4-28)." But the Draft EIR also explains that this impact is most likely to occur on roadways that have high traffic volumes or which lack dedicated pedestrian and bicycle facilities. The Draft EIR, therefore, concludes that it is reasonable to presume the

project could result in conflicts and other dangerous interactions between pedestrians, bicyclists, and vehicles unless the SUHSD proactively engages incoming students on the need to develop safe travel habits and use designated facilities. To this end, the SUHSD has incorporated Mitigation Measure TRA-2A into the project, which requires the SUHSD to proactively identify safe routes to school and engage students on the use of these routes. Thus, the Draft EIR's has adequately evaluated and mitigated the project's potential conflicts between pedestrians, bicyclists, and vehicles.

Comment G21: Arent Fox states the Draft EIR does not provide substantial evidence to support the effectiveness of Mitigation Measure TRA-2A.

Response to Comment G21: The Draft EIR does not "assume" that a safe route to school exists. Rather, the Draft EIR does provide substantial evidence indicating such routes do exist, including a description of existing pedestrian and bicycle facilities such as crosswalks, demarcated bike lanes, stop signs, signalized intersections, etc. (see Draft EIR section 4.1.3.1), which are also depicted on Draft EIR Figure 4-2.

In addition, the Draft EIR states (page 4-7), "The SUHSD notes the above information describes pedestrian facilities at the time the SUHSD issued the Notice of Preparation for this EIR (February 2016). As noted in section 4.1, the proposed Menlo Park Small High School Project is located in an area of the city that is transitioning from 1960's and 1970's industrial / warehouse land uses to newer, corporate campuses and mixed biotechnology and office land uses. The city anticipates this transition will increase the need for pedestrian and bicycle facilities in the city's Bayfront Area. Specifically, the city's Sidewalk Master Plan identifies many of the streets near the proposed Menlo Park Small High School site to have a medium or high priority for sidewalk improvements that increase walkability (City of Menlo Park 2009)." This reason is precisely why Mitigation Measure TRA-2A requires the SUHSD develop a Safe Routes to School Map in coordination with the city – so that existing and planned projects may be properly considered.

As indicated in Response to Comment G20, the Draft EIR notes potential conflicts between pedestrians, bicyclists, and vehicles are difficult to evaluate because they are contingent on factors that fluctuate by day and by pedestrian, bicyclist, and motorist. But, the Draft EIR does explains that this impact is most likely to occur on roadways that have high traffic volumes or which lack dedicated pedestrian and bicycle facilities. The Draft EIR, therefore, concludes that it is reasonable to presume the project could result in conflicts and other dangerous interactions between pedestrians, bicyclists, and vehicles unless the SUHSD proactively engages incoming students on the need to develop safe travel habits and use designated facilities. To this end, the SUHSD has incorporated Mitigation Measure TRA-2A into the project, which requires the SUHSD to proactively identify safe routes to school and engage students on the use of these routes. The Safe Routes to School Program is a nationally-recognized program that is designed to enable and encourage walking and bicycling to school. Mitigation Measure TRA-2A requires the school to provide identified safe routes to students as a means of proactively engaging students on safe travel patterns. This measure would, over time, promote the use of these routes by students and, therefore, be effective at reducing potential conflicts between pedestrians, bicyclists, and vehicles when traveling on roadways that have high traffic volumes or which lack dedicated pedestrian and bicycle facilities.

Comment G22: Arent Fox states the Draft EIR is not clear how Draft EIR Mitigation Measure TRA-2B would effectively minimize the potential for conflicts between pedestrians, bicyclists, and vehicles.

Response to Comment G22: As indicated in Response to Comment G20 and G21, the Draft EIR notes potential conflicts between pedestrians, bicyclists, and vehicles are difficult to evaluate because they are contingent on factors that fluctuate by day and by pedestrian, bicyclist, and motorist. But, the Draft EIR does explains that this impact is most likely to occur on roadways that have high traffic volumes or which lack dedicated pedestrian and bicycle facilities. In addition, the Draft EIR also identifies that streets adjacent to the proposed Menlo Park Small High School (e.g., Jefferson Drive, Constitution Drive, etc.), would experience a temporary and periodic surge in traffic flow during student drop-off and pick-up periods. As explained in the Draft EIR (page 4-28), this temporary traffic surge could result in vehicle queuing to enter or exit the campus and lead to improper and/or illegal student loading and unloading in the middle of the roadways (i.e., not at an intersection, crosswalk, or other designated pedestrian facility) or at or near adjacent businesses and their associated parking lots.

As a point of clarification, the SUHSD notes the temporary surge in traffic flow during student drop-off and pick-up periods is not considered a "separate" problem as Arent Fox purports. This traffic surge is directly related to Impact TRA-2 and is just one example of a potential conflict between pedestrians, bicyclists, and vehicles that the Draft EIR identifies.

The Draft EIR explains the potential for this specific potential conflict is considered low because the TIA prepared for the project concluded the site layout depicted in Figure 2-6 of the Draft EIR provides sufficient access, on-site circulation, and queueing capacity such that off-site vehicle queues would be minimized. Thus, the TIA's queueing analysis is the evidence supporting the Draft EIR's conclusion that the potential for off-site vehicle queueing that could lead to improper and/or illegal student loading and unloading is low. Mitigation Measure TRA-2B, as revised (see section 3.4 of this Final EIR) requires the SUHSD to formalize the proposed site circulation and drop-off / pick-up pattern, distribute this policy to school students so they are aware of the correct procedure, and prohibit (to the extent feasible by the school), off-campus loading and unloading at adjacent businesses. Thus, Mitigation Measure TRA-2B would be effective at minimizing the potential for off-site vehicle queueing that could lead to improper and/or illegal student loading and unloading to a less than significant level.

Comment G23: Arent Fox states that Draft EIR Mitigation Measure TRA-2C is not effective because it relies upon future actions by separate governmental authorities.

Response to Comment G23: Comment noted. The SUHSD has revised this mitigation measure to indicate the proposed Menlo Park Small High School shall participate in the city's Bayfront Transportation Management Association (if established) for the purposes of updating and planning for and providing the best possible safest routes to school (see section 3.4 of this Final EIR). The SUHSD notes that, as explained in the Draft EIR, the city's Bayfront Area is undergoing a transition from industrial and warehousing land uses to commercial, mixed use, and other land uses and that participation in the city's Bayfront Transportation Management Association would provide planning and consideration of student travel through Bayfront Area. The SUHSD notes that, as indicated in Response to Comment G21, Mitigation Measure TRA-2A, would, over time,

promote the use of safe travel routes by students and, therefore, be effective at reducing potential conflicts between pedestrians, bicyclists, and vehicles when traveling on roadways that have high traffic volumes or which lack dedicated pedestrian and bicycle facilities to a less than significant level. Mitigation Measure TRA-2C would serve to increase the effectiveness of Mitigation Measure TRA-2A, but is not necessary to support the Draft EIR's findings that Impact TRA-2 would be a less than significant project impact.

Comment G24: Arent Fox states the Draft EIR's evaluation of potential conflicts between vehicles, bicyclists, and pedestrians is not supported by substantial evidence and Draft EIR Mitigation Measures TRA-2A, TRA-2B, and TRA-2C fall short of what CEQA requires.

Response to Comment G24: Comment noted. As indicated in Response to Comments G20 to G23, the Draft EIR adequately discloses, evaluates and, where necessary, incorporates effective mitigation measures to reduce potential conflicts from pedestrians, bicyclists, and vehicles to a less than significant level.

Comment G25: Arent Fox states the Draft EIR improperly determines that impacts on GHG emissions are less than significant and should be recirculated with an updated GHG analysis.

Response to Comment G25: The Draft EIR's analysis of greenhouse gas emissions does not fail to provide rigorous analysis and concrete substantial evidence justifying its finding that GHG impacts would be less than significant as Arent Fox purports. The BAAQMD CEQA Guidelines clearly state (emphasis added): "The screening criteria developed for greenhouse gases were derived using the *default emission assumptions in URBEMIS* and using off-model GHG estimates for indirect emissions from electrical generation, solid waste and water conveyance" (BAAQMD 2011, page 3-1). The URBEMIS model uses the California Air Resources Board's EMFAC2007 model for on-road vehicle emissions and the OFFROAD2007 model for off-road vehicle emissions. URBEMIS models mobile, off road, and area sources emissions for both construction and operation of a project. In developing its screening thresholds, the BAAQMD took into account GHG emission estimates generated by URBEMIS and additional emissions generated by electrical generation, solid waste and water conveyance. All sources of emissions identified in the Menlo Park Small High School Project are accounted for in the methodology developed by the BAAQMD. The analysis, therefore, is consistent with the BAAQMD's guidance for screening values. Nonetheless, the SUHSD has quantified the project's potential GHG emissions using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2) to further demonstrate the proposed project would have a less than significant GHG impact (see Appendix K). As a worst-case scenario, the model was set to estimate emissions in 2018 (the inaugural year), with the trip generation rates for 400 students extrapolated from the TIA (a 400-person school is not anticipated until 2021). Despite this worst-case scenario, the modeling showed that the proposed project would generate 572 $MTCO_2e$ during operation, substantially below the 1,100 $MTCO_2e$ operational threshold established by the BAAQMD. Thus, the Draft EIR's analysis properly identifies that the potential GHG impacts resulting from the project would be less than significant. No further analysis is required, and the Draft EIR does not need to be recirculated.

Comment G26: Arent Fox states the Draft EIR's analysis of hazards and hazardous impacts is deficient and requires recirculation of the Draft EIR.

Response to Comment G26: The Draft EIR's analysis of hazards and hazardous materials impacts is not deficient. Arent Fox cites text from Draft EIR page 8-4 that states volatile organic compounds "at the proposed school site were either not detected or detected at levels that did not exceed applicable screening criteria." This text is presented under the Draft EIR's discussion of present site conditions and Preliminary Environmental Assessment (PEA) results. Arent Fox comments that the PEA itself states that chloroform was detected in two of eight sub-slab soil vapor samples. This comment is taken out of context. Page 5 of the PEA prepared for the project, which was included as Draft EIR Appendix G3, provides a discussion of general soil vapor quality. The discussion is based on sampling conducted in 2014 as part of a Phase 1 Environmental Site Assessment. The PEA text states, "Laboratory analysis of the eight sub-slab and eight subsurface soil vapor samples detected several VOCs; however, no chlorinated VOCs associated with the regional solvent plume (i.e., PCE/TCE and their breakdown products) were detected above their respective laboratory reporting limits. Following CalEPA and DTSC guidance, the detected VOCs were compared to calculated sub-slab and subsurface screening criterion that are 20 times (attenuation factor = 0.05) and 1,000 times (attenuation factor = 0.0001) the indoor air [residential screening level] . . . Chloroform was detected in 2 of 8 sub-slab soil vapor samples at concentrations of 5.5 $\mu g/m^3$ (SV-1) and 18 $\mu g/m^3$ (SV-5); its calculated screening level is 2.4 $\mu g/m^3$ . . . the source of the chloroform detected in subsurface vapor samples is not known but may be associated within indoor air contamination inside the building associated with existing tenant operations." The SUHSD notes this information is presented on Draft EIR page 8-5, which states, "The PEA estimated the total excess cancer risk from site soil gases to be 5 in one million, which exceeds DTSC screening criteria of 1 in one million; however, this risk calculation was driven by a single benzene concentration of 220 micrograms per cubic meter (μg/m3) detected in a soil vapor sample collected in November 2014. Subsequent sampling at the same general location and depth during this PEA investigation detected benzene at 13 $\mu g/m^3$. The total noncarcinogenic health hazard from site soil gas risks was estimated to be 0.5, which also does not exceed DTSC screening criteria of 1.0."

The SUHSD directs Arent Fox to the PEA's discussion of results (PEA page 12), and specifically the summary of soil vapor analytical data, which indicates benzene, toluene, and other VOCs were either not detected or detected at concentrations below screening criterion (PEA page 12 and 13). As noted on page 8-5 of the Draft EIR, "The PEA notes that benzene, a petroleum hydrocarbon vapor, naturally degrades in an aerobic environment and concludes that the site soil vapors do not pose a significant risk to human health or the environment. Accordingly, the PEA did not recommend remedial actions to eliminate, reduce, and/or mitigate risks posed by site soil gases. Nonetheless, the SUHSD would install an impermeable vapor barrier and ventilation system beneath the proposed buildings to provide the highest level of protection to future occupants against potential vapor and radon gas intrusion." Furthermore, the PEA has been evaluated and approved by the DTSC with the issuance of a "No Further Action" letter (Draft EIR page 8-11 and Appendix G3). Thus, the Draft EIR's hazards and hazardous materials analysis is consistent with the underlying technical information. This comment does not identify any new information that results in a new or more severe impact than identified in the Draft EIR. The Draft EIR does not need to be recirculated.

Comment G27: Arent Fox provides conclusive remarks related to the project suitability and need to revise and recirculate the Draft EIR.

Response to Comment G27: Comment noted. As indicated in Response to Comments G1 to G26, the Draft EIR's adequately discloses, evaluates and, where necessary, incorporates feasible, effective, and enforceable mitigation measures for the project's significant environmental impacts.

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Exponent

COMMENT LETTER "H"

Exponent
149 Commonwealth Drive
Menlo Park, CA 94025

telephone 650-326-9400
facsimile 650-326-8072
www.exponent.com

August 19, 2016

Mr. Matthew Zito
Chief Facilities Officer
480 James Avenue
Redwood City, CA 94062

Subject: Draft EIR

Dear Mr. Zito:

Per the request in your Notice of Draft Environmental Impact Report for the Menlo Park Small High School Project, Exponent respectfully submits the following comments for consideration by the Sequoia Union High School District.

Exponent continues to believe that 150 Jefferson Drive is not an appropriate place for a school based on the location being in an industrial area. We encourage the school district to engage in discussions with the cities in its district and real estate developers to identify a suitable location for the school. H1

Please refer to our letter addressed to you on March 25, 2016 for environmental information that the district should consider in determining if this industrial area is appropriate for a school. H2

If you choose to proceed with the development of the site, we request that you construct the facilities and implement operating procedures that will insure that the current businesses in the area are not adversely impacted and no increased liability is brought upon those businesses. Exponent has been operating for over 25 years in Menlo Park at 149 Commonwealth Drive and 160 Jefferson Drive. We have made substantial investments to accommodate our engineering and scientific testing at these locations and any changes forced upon our operations due to a school being located next door would have a detrimental impact on our business. H3

We want to reiterate that the use of this site as a high school and community college will create serious traffic and parking issues in and around Bohannon Business Park, negatively impacting neighboring businesses. Especially considering that there is no public transit supporting the area; the site plans do not accommodate student parking; and the traffic systems are not designed to accommodate the surges in traffic that will result from the school's schedule and volume. H4

The traffic impact analysis must include the impact from the community college's use of the site and should also consider the future traffic from the completion of all phases of the voter approved Menlo Park Gateway project; reoccupying of 180 Jefferson Drive (former Intuit campus); and occupying of the recently constructed buildings at 164 Jefferson Drive. H5

If you have any questions, feel free to contact me via telephone at (650) 688-7154 or via email at schlenker@exponent.com.

Regards,

Richard Schlenker

Richard Schlenker
Executive Vice President and Chief Financial Officer

4.8 RESPONSE TO COMMENTS FROM EXPONENT ENGINEERING

The SUHSD received five comments from Mr. Richard Schlenker, Executive Vice President and Chief Financial Officer at Exponent, a private business that shares the proposed school site's southern property line. These comments were generally related to the use and suitability of the site and surrounding area as a school and the potential traffic impacts of the project.

Comment H1: The commenter expresses belief that the proposed location is not appropriate for a school location due to its zoning as an industrial area and suggests the District should look at different sites for the proposed school

> *Response to Comment H1:* The SUHSD acknowledges Exponent's repeated concerns regarding whether it is appropriate to develop a small high school at 150 Jefferson Drive and appreciates Exponent's willingness to continue to coordinate and discuss these issues with SUHSD staff. Section S.8 of the Draft EIR identifies the suitability of a school in an industrial / commercial portion of the City of Menlo Park as an area of controversy; however, the SUHSD considers the proposed site suitable for school development for the reasons explained in Response to Comment B1. In addition, the SUHSD notes that, in accordance with CEQA and the CEQA Guidelines, Chapter 13 of the Draft EIR described a range of reasonable alternatives to the proposed project. Specifically, sections 13.2.1 and 13.4 evaluate the construction of a new, comprehensive high school campus and the construction of a small high school at a different site, respectively. As explained in these sections, the SUHSD searched for areas where new high school facilities could be developed. The search found one potentially feasible area for a new, comprehensive high school (the Salt Works restoration area of Redwood City) and two economically viable properties potentially capable of supporting smaller high school facilities. As explained in Draft EIR section 13.2.1, the construction of a new, comprehensive high school campus was found infeasible for cost reasons; this alternative would also not avoid or substantially lessen the significant and unavoidable traffic impacts of the project. As explained in section 13.4, the SUHSD expended more than $12.5 million dollars to purchase two properties for school development purposes, and it is not feasible for the SUHSD to acquire additional land at this time. Thus, the only alternative site for a small high school is the property at 535 Old County Road, San Carlos, which the SUHSD acquired in 2015. As described in section 13.4 of the Draft EIR, development of this site would not avoid or substantially lessen the proposed project's impacts, and is likely to result in more severe aesthetic, hazards, and noise impacts than the Menlo Park Small High School Project. Thus, the Draft EIR concludes development of the proposed project is the environmentally superior alternative.

Comment H2: The commenter references their letter of March 25, 2016 regarding environmental information the District should consider in determining if the existing industrial nature of the project area is appropriate for a school.

> *Response to Comment H2:* Comment noted. Section 3.2 of the Draft EIR identifies that the SUHSD received six written comment letters on the Notice of Preparation (NOP) the SUHSD issued in February 2016, including comments from Exponent, summarizes the nature of the comments, and explains which chapter of the Draft EIR addresses the comments. Exponent's letter of March 25, 2016 was included in full in Draft EIR, Volume 2, Appendix A.

Comment H3: The commenter requests that the SUHSD develop and operate the school with procedures intended to ensure that current businesses such as Exponent that have operated in the area for long periods of time are not adversely impacted by the school and have no increased liability brought upon them. The commenter also states forced changes to business operations necessary to accommodate a school would have a detrimental impact on the business community.

Response to Comment H3: The SUHSD has designed the proposed school such that nearby businesses would not be adversely impacted by the proposed school's development and operation. Section 2.1.1 of the Draft EIR describes several businesses in the immediate vicinity of 150 Jefferson Drive, including Exponent (Draft EIR page 2-4). Draft EIR section 8.1.7.1 describes the SUHSD conducted a records search and site visit of the Exponent facilities located at 149 Commonwealth Drive and 160 Jefferson Drive to better understand the risks posed by potential Exponent operations. The records search and site visit were conducted by qualified engineering staff from Cornerstone Earth Group, which prepared the Preliminary Environmental Assessment for the proposed school site. As explained under Impact HAZ-2 (Draft EIR page 8-14), the records search and site visit indicated the facilities would not pose a significant risk to the school. At the recommendation of Cornerstone Earth Group, the SUHSD has designed the proposed school such that most outdoor areas are located between a school building and Jefferson Drive, away from Exponent. In addition, the project design includes a positive pressure heating, ventilation, and air conditioning (HVAC) system that limits intrusion of ambient air into the school buildings, as well as use of filtration system capable of filtering 90% of particles greater than one micron in size.

In regards to liability, the SUHSD notes that legal liability is not in and of itself an environmental concern that requires addressing under CEQA. The SUHSD notes the Draft EIR adequately describes and evaluates potential safety risks posed by railroads, pipelines, and businesses and facilities that use and store hazardous materials; the Draft EIR concludes these risks are less than significant (see Response to Comment B2). The SUHSD also notes it has revised Mitigation Measures TRA-3A and TRA-3B to provide for the clear, enforceable control of on- and off-site student parking, which reduce the potential students to trespass into neighboring businesses for parking reasons (see section 3.4 of this Final EIR).

Comment H4: The commenter reiterates the project will create serious traffic and parking issues, especially considering the lack of public transit in the area, the site plan's insufficient on-parking, and temporary surges in traffic that existing roadways are not designed for.

Response to Comment H4: Comment noted. The SUHSD notes the Draft EIR adequately describes the project's transportations setting, including the lack of transit service to the proposed school site (Draft EIR section 4.1.2). As indicated in Response to Comments G14 to G19, the Draft EIR adequately discusses and evaluates the project's potential parking demand, deficit, and indirect environmental effects and incorporates feasible and effective mitigation measures to address these potential indirect effects. In addition, as indicated in Response to Comment G22, the SUHSD has adequately disclosed and evaluated the project's potential to generate temporary surges in traffic.

Comment H5: The commenter states that the traffic impact analysis must include the impact from community college's use of the site and should consider future traffic from all phases of the

Menlo Gateway project, reoccupying of 180 Jefferson Drive, and occupying of the recently constructed buildings at 164 Jefferson Drive.

Response to Comment H5: The Draft EIR notes the SUHSD may enter into a potential partnership with the San Mateo County Community College District (SMCCD) for use of the school site on limited weeknights and weekends. As explained in the TIA prepared for the project, if the SUHSD and SMCCCD decide to offer community college classes, this offering would consist of approximately four night classes that would begin after 7:00 PM. Thus, this traffic would not impact peak hour LOS operations or substantially affect roadway volumes.

The SUHSD directs Exponent Engineering to the Draft EIR's evaluation of cumulative (Year 2024) traffic impacts (Draft EIR section 12.2.16). Which includes traffic generated by approved development in the near term scenario (see Draft EIR Appendix C, Table 16), traffic that would be generated by developments currently pending approval (including the city's General Plan Update; see Draft EIR Appendix C, Table 29), as well as a growth rate of one percent per year to account for growth in regional traffic. Approved projects considered in both the near term and cumulative traffic scenarios includes the Menlo Gateway Project and projects at 162 and 164 Jefferson Drive. The reoccupation of 180 Jefferson Drive involves a sublease and therefore may not be resulting in a change conditions (since the building was formerly occupied); however, any project not specifically considered by the TIA's is considered to be evaluated as part of the regional growth factor applied to the cumulative impact scenario. Thus, the Draft EIR has adequately evaluated cumulative traffic conditions.

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SUHSD

Small High School EIR <smallhighschool-eir@seq.org>

150 Jefferson Draft EIR

1 message

COMMENT LETTER "I"

Mark Moragne <mmoragne@randmproperties.com> Mon, Aug 22, 2016 at 10:50 AM
To: smallhighschool-eir@seq.org

I'm the owner of 155 Jefferson Drive property and I support your plan for developing a Small High School at 150 Jefferson with one concern. Traffic - I am expecting that the Sequoia Union School district will develop a traffic mitigation plan so that adjacent property owners will not be negatively impacted by the school traffic. Strongly apposed to having lines of cars queuing up on Jefferson waiting for access onto the school site. I would also request that the School district not plan on using street parking to meet the school's parking needs. I1 I2 I3

Sincerely,

Mark Moragne
R&M Properties, LLC
650-444-5118

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4.9 RESPONSE TO COMMENTS FROM MARK MORAGNE (R&M PROPERTIES)

The SUHSD received three comments from Mr. Mark Moragne of R&M Properties, owner of the property at 155 Jefferson Drive. These comments were generally related to the project's potential traffic and parking impacts of the project.

Comment I1: The commenter expresses support for the project.

Response to Comment I1: Comment noted. The SUHSD appreciates the commenter's support for the project.

Comment I2: The commenter expresses concern regarding the project's traffic impacts and expects the SUHSD will develop mitigation so that adjacent property owners will not be negatively impacted by lines of cars queueing up on Jefferson Drive.

Response to Comment I2: The SUHSD directs the commenter to Response to Comments G20 to G24. As indicated in these responses, the Draft EIR adequately discloses, evaluates and, where necessary, incorporates effective mitigation measures to ensure adjacent property owners will not be significantly impacted by vehicles queueing on Jefferson Drive. Specifically, the Draft EIR explains the potential for adjacent businesses to be impacted by off-site vehicle queueing is low because the TIA prepared for the project concluded the site layout depicted in Figure 2-6 of the Draft EIR provides sufficient access, on-site circulation, and queueing capacity such that off-site vehicle queues would be minimized. Mitigation Measure TRA-2B, as revised (see section 3.4 of this Final EIR), requires the SUHSD to formalize the proposed site circulation and drop-off / pick-up pattern, distribute this policy to school students so they are aware of the correct procedure, and prohibit (to the extent feasible by the school), off-campus loading and unloading at adjacent businesses. Thus, Mitigation Measure TRA-2B would be effective at minimizing the potential for off-site vehicle queueing on Jefferson Drive to a less than significant level, thereby also substantially minimizing and/or avoiding the potential for improper and/or illegal student loading and unloading at adjacent businesses.

Comment I3: The commenter requests the SUHSD not plan on using street parking to meet the school's parking needs.

Response to Comment I3: Comment noted. As indicated in Response to Comment G15 to G17, the SUHSD has revised Mitigation Measures TRA-3A and TRA-3B to clarify and amplify the timing, performance standards, and mitigation requirements the SUHSD has incorporated into the project to address potential indirect effects associated with a potential parking deficit at the school (see section 3.4 of this Final EIR). These revised mitigation measures essentially require the SUHSD to obtain on- and off-site parking in an amount that matches demand, as determined by the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B. Mitigation Measure TRA-3C requires the SUHSD to coordinate with the city to provide temporary, on-street parking for school visitors, scheduled and unscheduled meetings, etc. As indicated in section 2.2.2 of this Final EIR, the SUHSD would coordinate with the Menlo Park Fire Protection District to add nine short-term, temporary parking spaces in the school's student loading and unloading lane, provided such temporary parking does not interfere with emergency fire access.

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COMMENT LETTER "J"

August 22, 2016

SUBJECT: **Draft EIR for New MENLO PARK SMALL HIGH SCHOOL**

Dear School District and City of Menlo Park:

I send the following feedback regarding the Draft EIR (DEIR) for the small high school proposed to be built at 150 Jefferson Drive in Menlo Park's M-2 area.

My primary concern is adequacy of the infrastructure to support the safety of the students, teachers and staff, and neighboring workers and residents. The EIR needs to do a better job to:

- Evaluate the likely impacts of approved and potential projects by using a current list
- Explore additional mitigation measures to minimize potential safety risks for bicyclists, pedestrians, and those who park far from the facility due to insufficient parking.
- Pursue additional alternatives to driving
- Evaluate alternatives to the Project

J1

More detail follows.

PROJECTS - The DEIR may have incorrectly estimated the impacts of the project and other approved/pending projects. Its listed of pending projects on Table 12-1 (volume 1 of DEIR) has a number of errors. For example:

- General Plan Update – characterizes this as only zoning changes in the Bayfront Area whereas the project also includes citywide buildout under the current General Plan
- 1300 El Camino Real – describes the prior grocery store project and Derry projects in addition to the current Greenheart project
- Facebook Expansion project – omits the proposed hotel in the nearby expansion project. Instead
- Stanford Campus expansion project in Redwood City (2.3 miles from the Project). Because the primary access points from highway 101 to this 1.5 million SF project are from Marsh and Woodside Road exits, its traffic is likely to affect the Project area

J2

An updated list, with associated impacts of those developments, should be addressed by the EIR. The existing conditions and expected impacts of approved, pending, and nearby projects should be consistent with those of other recently issued DEIR's (e.g., Greenheart 1300 El Camino Real, Facebook Expansion, General Plan Update) and reflect the Commonwealth Corporate Center's also.

SAFETY - As stated a significant and unavoidable Traffic Impacts "*TRA-2: The Menlo Park Small High School Project could cause or contribute to conflicts and/or dangerous interactions between pedestrians, bicyclists, and vehicles.*"... because the project is in "an area that lacks full pedestrian and bicycle connectivity to the broader region." Additionally, the Project is significantly under-parked. Suggested additional mitigation measures would be to work with the City of Menlo Park:

- To update its bicycle and sidewalk Master Plans to ensure that there are adequate pedestrian and bicycle facilities in the area. Specifically, these should include bicycle paths that would connect the Project site to the west side of highway 101, utilizing the Ringwood overcrossing. This is particularly important until improvements are made to the Marsh and Willow overcrossings of the highway.

J3

- To update its TIF project list and funding to ensure that pedestrian and bicycle facility improvements are adequately funded and complete in an expedited timeframe to support the new school.
- To expand city shuttles to support schoolkids reaching the facility by shuttle rather than private vehicles
- To require nearby companies to share their shuttles with the school district

J3 Cont.

Alternative – An Additional Alternative to pursue may be to approach a major property owner to swap development rights. Since the Project would add significant impacts to other enterprises in the M-2 area, a major property owner might be willing to swap development rights on this school district site for a site with fewer impacts to their nearby properties and to the school.

For example, the Bohannon organization owns a large amount of land on the west side of highway 101 where there might be fewer cumulative impacts, and fewer safety risks inherent to a location near highly-travelled roadways such as Marsh, Bayfront Expressway. Ideally, they could be persuaded to provide additional land for future district growth, too. Such a swap might require rezoning, which possibility could be incorporated into the General Plan Update process.

J4

For the record – The DEIRS for the Greenheart 1300 El Camino Real, Facebook Expansion, and General Plan Update all need explicitly to take into consideration of the proposed high school and its impacts. None of these DEIRS listed this project. It was known; otherwise the rezoning of this site as public facility would not have been included in the draft zoning ordinance update process. This project's DEIR shows additional Significant and Unavoidable impacts that must be taken into account in the other EIR reviews.

J5

Thank you for your consideration,

Patti Fry
Menlo Park resident and former Planning Commissioner

4.10 RESPONSE TO COMMENTS FROM PATTI FRY (INTERESTED INDIVIDUAL)

The SUHSD received five comments from Patti Fry, an interested individual. These comments were generally related to approved and pending projects used in the cumulative impact analysis, safety, and alternatives.

Comment J1: Ms. Fry summarily expresses a concern with the adequacy of existing infrastructure to support the safety of the school and neighboring workers and residents, as well as the adequacy of the EIR.

> *Response to Comment J1:* Comment noted. As explained in Response to Comments J2 to J4, the Draft EIR has adequately evaluated potential cumulative traffic impacts, included additional mitigation measures to minimize potential safety conflicts, and considered a range of reasonable alternatives to the project.

Comment J2: Ms. Fry comments the Draft EIR may have incorrectly evaluated cumulative impacts based on the list of pending projects contained in Draft EIR in Table 12-1.

> *Response to Comment J2:* The Draft EIR's evaluation of cumulative (Year 2024) traffic impacts (Draft EIR section 12.2.16) includes traffic generated by approved development in the near term scenario (see Draft EIR Appendix C, Table 16), traffic that would be generated by developments currently pending approval, as well as a growth rate of one percent per year to account for regional traffic increases. Approved development projects considered in both the near term and cumulative traffic scenarios considered as part of the TIA include the Commonwealth Corporate Center Project. Pending development projects considered as part of the Traffic Impact Analysis' (TIA) cumulative traffic scenarios include the city's General Plan Update, the 1300 El Camino Real Project (consisting of residential and office space development), and the Facebook Expansion Project. The Stanford in Redwood City Campus project is located in Redwood City; the SUHSD provided Redwood City with both the Notice of Preparation (NOP) and Notice of Availability (NOA) for the project and did not receive any comments from the City of Redwood City on the NOP or NOA. Nonetheless, this project would be accounted for as part of the regional growth factor applied to the cumulative impact scenario. Thus, the cumulative traffic analyses has appropriately evaluated traffic impacts. This comment does not otherwise substantially change the other cumulative impact analyses provided in the Draft EIR.

Comment J3: Ms. Fry suggests a number of additional mitigation measures that address safety for pedestrians, bicyclists, and vehicles, the lack of pedestrian and bicycle facilities in the area, and the lack of on-site parking.

> *Response to Comment J3*: Comment noted. As a point of clarification, the Draft EIR considers Impact TRA-2 to be a potentially significant impact. The implementation of Mitigation Measures TRA-2A, TRA-2B, and TRA-2C, as revised (see section 3.4 of this Final EIR), would reduce this impact to a less than significant level.
>
> - The SUHSD notes it cannot require the city to update its Comprehensive Bicycle Development Plan or its Sidewalk Master Plan; however, Mitigation Measure TRA-2A does require the SUHSD to coordinate with the city on the development of a Safe Routes to School map for the proposed school that would promote safe travel patterns by students. In addition, Mitigation Measure TRA-2C requires the SUHSD to join the Bayside Transportation Management Association if and when

this stakeholder group is developed to provide planning and consideration of student travel through Bayfront Area.

- The SUHSD notes it cannot require the city to update its Transportation Impact Fee (TIF) project list. It is up to the city's Transportation Division to update their TIF project list. The SUHSD notes, however, that it has added Mitigation Measure TRA-1E to the EIR, which requires the SUHSD to negotiate with the city on a voluntary payment to the city's TIF Program for the purposes of improving transportation infrastructure (see section 3.4 of this Final EIR).
- The SUHSD notes it has revised Mitigation Measure TRA-1C to include coordination with the city on the shuttle service, including potential private shuttle services, to the Menlo Park Small High School (see section 3.4 of this Final EIR).

Comment J4: Ms. Fry suggests the project evaluate an additional alternative that involves a land swap between developers to locate the project at a more appropriate site.

Response to Comment J4: As indicated in Response to Comment H1, Chapter 13 of the Draft EIR described a range of reasonable alternatives to the proposed project. Specifically, sections 13.2.1 and 13.4 evaluate the construction of a new, comprehensive high school campus and the construction of a small high school at a different site, respectively. As explained in these sections, the SUHSD searched for areas where new high school facilities could be developed. The search found one potentially feasible area for a new, comprehensive high school (the Salt Works restoration area of Redwood City) and two economically viable properties potentially capable of supporting smaller high school facilities. As explained in Draft EIR section 13.2.1, the construction of a new, comprehensive high school campus was found infeasible for cost reasons; this alternative would also not avoid or substantially lessen the significant and unavoidable traffic impacts of the project. As explained in section 13.4, the SUHSD expended more than $12.5 million dollars to purchase two properties for school development purposes, and it is not feasible for the SUHSD to acquire additional land at this time. Thus, the only alternative site for a small high school is the property at 535 Old County Road, San Carlos, which the SUHSD acquired in 2015. As described in section 13.4 of the Draft EIR, development of this site would not avoid or substantially lessen the proposed project's impacts, and is likely to result in more severe aesthetic, hazards, and noise impacts than the Menlo Park Small High School Project. Thus, the Draft EIR concludes development of the proposed project is the environmentally superior alternative.

Comment J5: Ms. Fry states other city environmental documents need to take into consideration the proposed Menlo Park Small High School Project.

Response to Comment J5: Comment noted. The scope of any environmental document the city is acting as CEQA lead agency on is outside the scope of the SUHSD's CEQA review of the proposed Menlo Park Small High School Project.

4.11 REFERENCES

The following references were used to prepare the responses to comments presented in sections 4.1 to 4.10 of this Final EIR:

Bay Area Air Quality Management District (BAAQMD) 2011. *California Environmental Quality Act Air Quality Guidelines.* San Francisco, CA. May 2011.

Hexagon Transportation Consultants (Hexagon) 2016a. *Everest High School AM and PM Peak Hour Volume Count Worksheet*. Gilroy, CA. September 21, 2016.

Sequoia Union High School District (SUHSD) 2015. *Menlo-Atherton High School Facilities Master Plan Final Program Environmental Impact Report*. Redwood City, CA. July 2016.

W-Trans 2016. Phone communication between Mark Spencer, W-Trans, and Chris Dugan, MIG. September 23, 2016.

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CHAPTER 5 MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation, Monitoring and Reporting Program (MMRP) has been prepared pursuant to the CEQA Guidelines, which state:

> "When adopting a mitigated negative declaration, the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects" (§15074(d)) and;
>
> "The Lead Agency may choose whether its program will monitor mitigation, report on mitigation, or both. "Reporting" generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. "Monitoring" is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both." (§15097 (c))

Table 5-1 beginning on the next page list the impacts, mitigation measures, and timing of the mitigation measure (when the measure will be implemented) related to the Menlo Park Small High School Project. All of the mitigation measures listed here will be implemented by the District, or by their appointees.

According to CEQA Guidelines section 15126.4 (a) (2), "Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design." Therefore, all mitigation measures as listed in this MMRP will be adopted by the District Board of Trustees when the project is approved.

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Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
AIR QUALITY				
Impact AIR-1: Implementation of the Menlo Park Small High School Project would generate criteria air pollutant emissions.	**Mitigation Measure AIR-1: Reduce Fugitive Dust Emissions** To reduce potential fugitive dust that may be generated by the Menlo Park Small High School Project during building demolition, site preparation, and building construction activities, the District shall implement the following BAAQMD basic construction measures: • Water all exposed surfaces (e.g., staging areas, soil piles, graded areas, and unpaved access roads) two times per day during construction and adequately wet demolition surfaces to limit visible dust emissions. • Cover all haul trucks transporting soil, sand, or other loose materials off the project site. • Use wet power vacuum street sweepers at least once per day to remove all visible mud or dirt track-out onto adjacent public roads (dry power sweeping is prohibited) during construction of the propose project. • Vehicle speeds on unpaved roads/areas shall not exceed 15 miles per hour. • Complete all areas to be paved as soon as possible and lay building pads as soon as possible after grading unless seeding or soil binders are used.	**Implementation:** The District shall incorporate this air quality mitigation measure into all appropriate bid, contract, and engineering and site plan (e.g. building, grading, improvement plans) documents. **Timing:** Prior to any ground-disturbing activities, unless otherwise specified.	**Monitoring:** The District shall review all appropriate bid, contract, and engineering and site (building, grading, improvement plans) documents for inclusion of dust control measures.	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	• Minimize idling time of diesel powered construction equipment to five minutes and post signs reminding workers of this idling restriction at access points and equipment staging areas during construction of the proposed project. • Maintain and properly tune all construction equipment in accordance with manufacturer's specifications and have a CARB-certified visible emissions evaluator check equipment prior to use at the site. • Post a publicly visible sign with the name and telephone number of the construction contractor and SUHSD staff person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The publicly visible sign shall also include the contact phone number for the Bay Area Air Quality Management District to ensure compliance with applicable regulations.			
BIOLOGICAL RESOURCES				
Impact BIO-1: Implementation of the proposed project could result in impacts to nesting birds, and roosting bats	**Mitigation Measure BIO-1A: Avoid and Minimize Impacts to Nesting Birds** The District shall initiate project construction outside of the bird nesting season (defined as the time between September 1st and January 31st). If it is not feasible to start construction outside the	**Implementation:** The District shall incorporate these biology mitigation measures into all appropriate bid, contract, and	**Monitoring:** The District shall review all appropriate bid, contract, and engineering and site (building, grading, improvement plans)	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	bird nesting season (i.e., construction would start between February 1st and August 31st), a qualified biologist shall perform a pre-construction survey to identify active bird nests on or near the site. The pre-construction survey shall take place no more than 7 days prior to the start of construction, and if more than 7 days pass with no construction activities, another pre-construction survey shall be required. The survey shall include all trees and shrubs on the site, all buildings or other structures to be demolished, and all trees and shrubs within a 250-foot radius of the site. If an active, native bird nest is found during the survey, the biologist, shall, in consultation with the CDFW, designate a construction-free buffer zone (typically 500 feet for raptors and 250 feet for other birds, but these distances can usually be reduced in urban areas) around the nest to remain in place until the young have fledged. **Mitigation Measure BIO-1B: Avoid and Minimize Impacts to Roosting Bats** A qualified biologist shall visually inspect trees or structures to be removed for bat roosts within 7 days prior to their removal. The biologist will look for signs of bats including sightings of live or dead bats, bat calls or squeaking, the smell of bats, bat droppings, grease stains or urine stains around openings in trees or structures, or flies around such openings. Trees with multiple hollows, crevices, forked	engineering and site plan (e.g. building, grading, improvement plans) documents. **Timing:** Prior to the start of construction activities, as specified in the mitigation measure.	documents for inclusion of biological measures.	

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	branches, woodpecker holes or loose and flaking bark have the highest chance of occupation and shall be inspected the most carefully. If signs of bats are detected, CDFW shall be contacted about how to proceed. Echo-location surveys may be needed to verify the presence of bats, or an exclusion zone around the occupied tree or structure may be recommended until bats leave the roost. Due to restrictions of the California Health Department, direct contact by workers with any bat is not allowed. The qualified bat biologist will be contacted immediately if a bat roost is discovered during project construction. **Mitigation Measure BIO-1C: Tree Replacement** The District shall replace all trees with a DBH of 15.0 inches or greater that are removed during project construction at a 1:1 ratio. The trees do not need to be replaced in-kind, but should provide similar habitat values as the tree being replaced in terms of structure, food sources, etc. Locally native species such as native oaks (Quercus spp.) shall be used as replacement trees when possible, and invasive species such as eucalyptus (Eucalyptus spp.) shall be avoided. All replacement trees used shall be healthy and sourced from a reputable nursery, and guaranteed to be pathogen free. Replacement trees shall be monitored for a minimum of three years, and dead or unhealthy replacement trees shall be			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	removed and replaced with healthy new trees. If all replacement trees are healthy after three years of monitoring, monitoring may cease.			
CULTURAL RESOURCES				
Impact CUL-1: Project construction could disturb unrecorded historical, archaeological, paleontological, and tribal cultural resources and/or unrecorded human remains.	**Mitigation Measure CUL-1A: Minimize and Avoid Impacts to Unrecorded Cultural and Historic Resources, Tribal Cultural Resources, and Human Remains** In the event that unrecorded cultural or historical resources, or tribal cultural resources are accidentally discovered during project construction, the SUHSD shall: • Treat any potential cultural, historical, tribal and paleontological material as a resource to be protected until determined otherwise by a qualified archaeologist or paleontologist. • Ensure that no potential resource is removed or damaged by project personnel. • Stop all earth-disturbing work (e.g., excavation, piling, foundation removal, etc.) within 50 feet of the discovered material, avoid altering the material and its context in any way, and immediately (within 24 hours) have the resource evaluated by a qualified archaeologist or paleontologist before continuing work within 50 feet of the location of the	**Implementation:** The District shall incorporate these cultural resource mitigation measure into all appropriate bid, contract, and engineering and site plan (e.g. building, grading, improvement plans) documents. **Timing:** Prior to any construction activities and during construction as specified in the mitigation measure.	**Monitoring:** The District shall review all appropriate bid, contract, and engineering and site (building, grading, improvement plans) documents for inclusion of cultural resource measures.	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	discovered resource • In the event the find is determined to be a historical or unique archaeological resource, a qualified archaeologist shall develop measures, in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines, which avoid or substantially lessen potentially significant impacts on cultural or tribal cultural resources, with a preference for preservation in place. The SUHSD shall consult with the project archaeologist before continuing work within 50 feet of the location of the discovered resource. If unrecorded human remains are accidently discovered during construction activities, the measures specified in Section 15064.5(e)(1) of the CEQA Guidelines shall be followed: • There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Mateo County coroner is contacted to determine that no investigation of the death is required. If the coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall identify the person or persons it believes to be			

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98; or, if the NAHC cannot identify the most likely descendants (MLD), the MLD fails to make a recommendation, or the property owner rejects the MLD's recommendations, the property owner can rebury the remains and associated burial goods with appropriate dignity in an area not subject to ground disturbance. **Mitigation Measure CUL-1B: Minimize and Avoid Impacts to Paleontological Resources** If paleontological resources are encountered, the SUHSD shall avoid altering the resource. All piling activities will cease immediately and, additionally, no work shall be carried out within the stratigraphic context that the resource was discovered in until a qualified paleontologist has evaluated, recorded, and determined appropriate treatment of the resource consistent with protocols of the Society for Vertebrate Paleontology and in			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	consultation with the County. **Mitigation Measure CUL-1C: Minimize and Avoid Impacts to all Archaeological, Cultural, Historical, and Paleontological Resources from Piling Activities** A qualified archaeologist shall monitor not less the 5% of the total number of augercast piles during the excavation process. The monitoring will consist of a representative sample across the entire area affected by piling. The archaeologist will divide the site into areas, and by coordinating with the piling crew and site engineer, will ensure that the first piles from each area are monitored. Additional monitoring of piling activities is at the discretion of the site archaeologist, but will not exceed 10% of the total number of piles if no archaeological, cultural, historical or paleontological resources are discovered during the piling operations			
HAZARDS AND HAZARDOUS MATERIALS				
Impact HAZ-1: Construction and operation of the Menlo Park Small High School could result in the release or potential release of hazardous materials that pose a risk to human health and/or the environment.	**Mitigation Measure HAZ-1A: Minimize and Avoid Impacts from Unanticipated Hazardous Materials** In accordance with the California Department of Toxic Substances Control's (DTSC) "No Further Action" letter issued for the Menlo Park Small High School Project Preliminary Environmental Assessment, and Education Code 17213.2(e), in the event unanticipated contamination or hazardous materials are	**Implementation:** The District shall incorporate these hazards and hazardous materials mitigation measures into all appropriate bid, contract, and engineering and site plan (e.g. building, grading,	**Monitoring:** The District shall review all appropriate bid, contract, and engineering and site (building, grading, improvement plans) documents for inclusion of hazards/hazardous materials measures.	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	discovered during project construction (e.g., gasoline odors, or oily soil or water), the SUHSD shall: • Stop all work immediately, contact the DTSC and, in coordination with the DTSC, take appropriate investigative and/or remedial action to adequately characterize the contamination and ensure the release or potential release of hazardous materials would not pose a significant threat to human health and/or the environment. • Construction may proceed if, after coordinating with the DTSC, it is determined activities would not affect the release or potential release of a hazardous material. **Mitigation Measure HAZ-1B: Minimize and Avoid Impacts from Lead Paint and Asbestos-Containing Building Materials** Prior to the start of any building demolition activity, the SUHSD shall: • Hire a qualified inspector(s) to survey the building for potential lead paint and asbestos containing materials. o If lead or asbestos are found, the SUHSD shall remove the materials from the building to the extent feasible and in accordance with all applicable regulations, such as Bay Area Air Quality Management District (BAAQMD) Regulation 11, Rule 2, Asbestos	improvement plans) documents. **Timing:** Prior to any construction activities and during construction as specified in the mitigation measure.		

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	Demolition, Renovation, and Manufacturing. o If it is not feasible to remove or strip materials out of the building (e.g, asbestos containing concrete), the District shall ensure emissions of lead and /or asbestos are captured and prevented from being released into the outside air by sufficiently wetting the material, providing HEPA exhaust, ventilation, collection of emissions, or other equivalent method. o Ensure lead and asbestos containing materials are properly disposed of and transported to an appropriate waste disposal facility • Submit a written plan or notification of intent to demolish the structures at 150 Jefferson Drive to the BAAQMD at least 10 working days prior to the start of demolition activities, in accordance with BAAQMD Regulation 11, Rule 2. **Mitigation Measure HAZ-1C: Minimize and Avoid Impacts from Equipment Leaks and Spills** The District shall minimize and avoid potential leaks and spills from heavy construction equipment used during demolition, site preparation, and building construction activities by:			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	• Designating vehicle and equipment storage, staging, and clean-up locations. • Designating equipment fueling locations and ensuring appropriate spill containment measures and spill response equipment is on-site. • Inspecting equipment for leaks prior to and at the conclusion of daily construction activities. If leaks are observed, the leaking equipment shall be repaired immediately. All contaminated water, sludge, spill residue, or other hazardous compounds discovered during inspections shall be contained and disposed of, as necessary, at lawfully permitted or authorized disposal sites.			
HYDROLOGY AND WATER QUALITY				
Impact HYD-1: The proposed project is at risk of future inundation from sea level rise.	**Mitigation Measure HYD-1: Raise Final Building Locations above Base Flood Elevations** To reduce potential flooding impacts and inundation from sea level rise, the District shall raise the lowest finish floor elevation of all buildings at least one foot above the existing base flood elevation.	**Implementation:** The District shall incorporate this hydrology and water quality mitigation measures into all appropriate bid, contract, and engineering and site plan (e.g. building, grading, improvement plans) documents.	**Monitoring:** The District shall review all appropriate bid, contract, and engineering and site (building, grading, improvement plans) documents for inclusion of hydrology/water quality measures.	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
		Timing: Prior to any ground-disturbing activities, unless otherwise specified.		
PUBLIC SERVICES AND UTILITIES				
Impact PSU-1: The Menlo Park Small High School Project would increase wastewater generation at the site and could result in new or expanded wastewater facilities.	**Mitigation Measure PSU-1A: The District shall incorporate water saving devices on all new water using fixtures.** The District shall incorporate water saving features or devices in all new water using fixtures installed at the Menlo Park Small High School. This can include, but is not limited to the use of high efficiency faucet aerators, shower heads, toilets and urinals; automatic faucets; or air cooled or water saving ice machines. **Mitigation Measure PSU-1B: Minimize and Avoid Impacts to the West Bay Sanitation District Sewer System.** The District shall coordinate with the West Bay Sanitary District to determine when and what, if any, sanitary sewer system improvements can be implemented to minimize flows to the sewer system to the maximum extent feasible and /or avoid upgrades to existing sanitary sewer facilities at the Menlo Park Small High School site and/or on Jefferson Drive. Options to reduce sanitary sewer flows from the school may include: • Implementing water-saving features as required by Mitigation Measure PSU-			

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	1A • Constructing underground holding tanks to hold sewer flows during the day and pump it off-site at night when flow rates are lower • Rerouting or diverting portions of sewer flows to other sewer facilities not currently impacted by inadequate capacity • Other measures determined by the West Bay Sanitary District to minimize and avoid upgrades to sanitary sewer facilities serving the Menlo Park Small High School Project			
TRANSPORTATION				
Impact TRA-1: The Menlo Park Small High School Project would add peak hour and daily trips to the circulation and transportation system in the vicinity of the school site.	**Mitigation Measure TRA-1A: Prepare and Implement a Travel Demand Management Program for Menlo Park Small High School Students, Faculty, and Staff** Prior to the start of the 2018-2019 school year, the Menlo Park Small High school shall prepare and implement a formal, written Travel Demand Management (TDM) Program for the Menlo Park Small High School. The TDM Program shall cover school students, faculty, and staff, and shall set as its minimum performance standard a 35 percent mode split for combined student, faculty, and staff walking, bicycling, carpools, transit, and other non-single occupancy vehicle travel modes. The	**Implementation:** The District shall incorporate these traffic mitigation measures into appropriate school policy manuals and administrative procedures. **Timing:** The District shall develop the formal, written TDM Program by August 1, 2018; the District shall implement other measures as specified in the	**Monitoring:** The District shall review all appropriate bid, contract, and school policy manuals, administrative procedures, and operating protocols for inclusion of traffic reduction measures (if necessary).	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	minimum performance standard for the school shall increase to 45 percent by the time the school reaches full enrollment in the 2021-2022 school year. As part of its program, the school shall designate a central TDM coordinator to oversee the TDM Program and monitor the program's effectiveness. The TDM Program shall be tailored to the school's students, faculty, and staff based on the results the travel mode survey required by Mitigation Measure TRA-1B, and shall consider and account for the starting point, travel distance, and transportation modes available to school's students, faculty, and staff (e.g., not all students may have a bicycle or live near a transit stop). As of October 2016 school demographics that would enable a tailored TDM Program are not available. Accordingly, the Menlo Park Small High School shall initiate its TDM Program with the following measures: • A pledge or commitment that shall be included in the school's student handbook and which shall promote and encourage students to seek safe, non-single occupancy vehicle travel school commute modes • A commitment to provide student parking limits and controls in accordance with Mitigation Measures TRA-3A and TRA-3B	measure.		

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	• A commitment to provide student bus transportation and evaluate the expansion of this service in accordance with Mitigation Measure TRA-1D • Adequate, secure bicycle parking and a provision to add bicycle racks as demand increases • Provide information (e.g., schedules, rates and fares) about Caltrain, SamTrans, and other relevant transit services (e.g., Marsh Road Shuttle) that could provide an alternative means of transportation to school • Organized school-wide walk and bike to school day, week, etc. • Promotions and activities to incentivize alternative modes of transportation (e.g., competitions to see which grade level avoids the most vehicle trips) • Use of a web- or mobile-based application to connect students wishing to carpool • Notice / awareness of TDM measures in the school media materials (e.g., website, newsletter, etc.) • Distribution to students and staff on at least an annual basis of information about other local and regional TDM programs such as, but not limited to, the City of Menlo Park shuttle services and the San Mateo County Transportation Demand Management Agency's Peninsula Traffic Congestion			

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	Relief Alliance Program. The effectiveness of the school's TDM Program shall be determined by using the annual travel mode survey required by Mitigation Measure TRA-1B. If this survey indicates the TDM performance standard is not being met, the Menlo Park Small High School shall identify, evaluate, and incorporate additional measures into its TDM Program. These measures may include, but are not limited to: • Schedule late start days (i.e., days on which classes commence later than the times identified in section 2.1 of the Final EIR dated October 6, 2016) • A permanent late school start time (no later than 9:00) • A commitment to provide transit / shuttle service in accordance with Mitigation Measure TRA-1C • Other measures deemed feasible by the school and which reduce single-occupancy vehicle trips such that the TDM Program performance standard is and continues to be met, as verified by the annual travel mode survey required by Mitigation Measure TRA-1B. The TDM Program and its performance standard shall apply each year the school is in operation, and the school shall strive to continually improve the success of the program.			

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	Mitigation Measure TRA-1B: Conduct Menlo Park Small High School Travel Mode Survey to Tailor and Evaluate the Effectiveness of the School's TDM Program Beginning with the school's inaugural freshman class, anticipated to start studies in the 2018-2019 school year, the Menlo Park Small High School shall contract with a qualified transportation planning firm to conduct a student, faculty, and staff travel survey. The survey shall be updated periodically as deemed necessary by the District's contracted transportation planning firm. School staff shall administer the survey once per year over a minimum two-day period. The survey shall focus on student, faculty, and staff travel modes, vehicle occupancies, time of travel to school in the morning and from school in the afternoon, and/or other information recommended by the qualified transportation planning firm. The survey results shall be tabulated to assess current trip generation by mode, time-of-day,-grade or faculty/staff level, and/or other information recommended by the transportation planning firm. The school shall use the results of the annual survey to tailor the school's TDM program and evaluate its effectiveness in accordance with Mitigation Measure TRA-1A.			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	Mitigation Measure TRA-1C: Evaluate the feasibility of Transit Service The District shall evaluate the feasibility of establishing transit (bus or shuttle) service for the Menlo Park Small High School. • By July 1, 2017, the SUHSD shall re-initiate contact with SamTrans and the City of Menlo Park regarding dedicated bus or shuttle service for the Menlo Park Small High School. As part of this initial contact, the SUHSD shall engage the SamTrans and the City to assess opportunities for a public private partnership in which private shuttle buses are shared for school commute purposes. • By January 31, 2018, the SUHSD shall, in coordination with the SamTrans and/or the City of Menlo Park, complete an evaluation of the technical, economic, and demographic factors that affect the feasibility of dedicated bus or shuttle service for the Menlo Park Small High School. The evaluation may be completed by the SUHSD's Transportation Department or by an SUHSD-designated consultant with expertise in transit planning and operations. The SUHSD shall not be held responsible for delays outside of its control that affect the completion of this evaluation (e.g., the SUHSD has not received information from other agencies that			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	is needed to complete the evaluation). • If the SUHSD, in coordination with SamTrans and/or the City of Menlo Park, determines that dedicated bus or shuttle service is feasible, the SUHSD shall initiate the service as soon as possible, but no later than the start of the 2019-2020 school year. • If it is determined that such service is not feasible because there is insufficient or overly dispersed ridership such that service would be prohibitively expensive (as determined by the SUHSD, SamTrans, and/or the City of Menlo Park), disruptive to other transit lines or ridership, or logistically infeasible (e.g., too long of a commute time), the evaluation shall consider if, when, and how the obstacles that make such service infeasible could be addressed and should be re-evaluated (e.g., student enrollment is too low and needs to be higher, there is insufficient student density along potential bus routes, etc.). The SUHSD shall re-evaluate the feasibility of transit service at appropriate intervals, with intent to initiate service as soon as possible after it is determined such service is feasible. • If it is determined that such service is feasible, the SUHSD shall coordinate with SamTrans and the City and			

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	evaluate the opportunity for providing reduced or subsidized transit fares as a means to promote and increase ridership. **Mitigation Measure TRA-1D: Provide Bus Service to the Menlo Park Small High School** The District shall provide bus service to and from the Menlo Park Small High School as follows: • School bus service shall be in place in time for the 2018-2019 school year and there shall be capacity to transport 25 students to and from school. The actual ridership level will depend on student demographics; however, the District shall make every effort to maximize student ridership. • The school's TDM Program shall include an evaluation of whether there it is feasible and appropriate to expand bus service as school enrollment increases and changes. Factors that affect whether such expansion of service would be considered feasible would include student demographics, existing ridership levels, compliance with TDM performance standards, and costs associated with additional bus service.			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	Mitigation Measure TRA-1E: Consult with the City of Menlo Park on an Voluntary Payment to the City's Transportation Impact Fee (TIF) Program Prior to the start of the 2018-2019 school year, the District shall consult with the City of Menlo Park to: • Negotiate a reasonable and proportionate voluntary payment to the City's TIF Program. The voluntary payment shall consider and take into appropriate account the uncertainty associated with whether or not a voluntary payment to the City or another agency to improve transportation-related infrastructure would substantially lessen the project's impacts and be implemented in a reasonable timeframe. The voluntary payment shall also consider the trip reduction benefits associated with Mitigation Measures TRA 1A, TRA-1B, TRA-1C, and TRA-1D. The SUHSD shall work with the city to identify the schedule for the voluntary payment of the project's TIF. • As part of the negotiation, the SUHSD and the City shall consider whether it is preferable to substitute SUHSD staff time and participation in any City-sponsored transportation planning or travel demand management programs in-lieu of cash payment.			

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
Impact TRA-2: The Menlo Park Small High School Project could cause or contribute to conflicts and/or dangerous interactions between pedestrians, bicyclists, and vehicles.	**Mitigation Measure TRA-2A: Safe Routes to School** The Menlo Park Small High School, in coordination with the City of Menlo Park, shall prepare a Safe Routes to School Map that identifies facilities such as traffic lights, crosswalks, and demarcated bikeways that promote safe routes to school. The Menlo Park Small High School shall provide this map to parents and students via school newsletter or other materials (e.g., Back-to-School Night presentation) at least once a year and shall maintain an electronic copy of the map on the school's website at all times. The school shall also provide the map the City of Menlo Park Transportation Division. **Mitigation Measure TRA-2B: Reduce Potential Off-Campus Student Loading and Unloading** The Menlo Park Small High School shall prepare and implement a formal, written policy outlining student loading and unloading procedures for the school. The policy shall: • Describe the student loading and unloading areas at the school • Contain a map depicting student loading and unloading areas • Prohibit off-campus student loading and unloading at adjacent businesses and on adjacent The school shall distribute this policy to	**Implementation:** The District shall incorporate these traffic mitigation measures into appropriate school policy manuals and administrative procedures. **Timing:** The District shall develop the formal, written policy by August 1, 2018; the District shall implement other measures as specified in the measure.	**Monitoring:** The District shall review all appropriate bid, contract, and school policy manuals, administrative procedures, and operating protocols for inclusion of the safe routes map and loading / unloading policies.	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	each incoming freshman and sophomore at the beginning of the school year (the policy shall be included in the Student Handbook), and shall also publish the policy in school newsletters and/or other materials at least once a year. As part of this policy, school staff shall, upon receipt of a complaint regarding off-campus student loading and unloading, use appropriate efforts to identify and dissuade the individual responsible for the off-campus loading or unloading from repeating their activity. **Mitigation Measure TRA-2C: Participate in City of Menlo Park's Bayfront Transportation Management Association** The SUHSD shall coordinate with appropriate stakeholders (such as the City of Menlo Park, SamTrans, and local businesses) if and when the City of Menlo Park establishes its Bayfront Transportation Management Association (TMA) to assess and recommend changes to signage, pedestrian facilities, and other solutions that would address pedestrian and bicycle safety concerns, improve safe routes to schools, and improve traffic circulation in the Bayfront Area. The SUHSD shall update the school's Safe Routes to School Map as new traffic circulation patterns or infrastructure is recommended and implemented by the TMA.			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
Impact TRA-3: The Menlo Park Small High School could result in result in indirect environmental effects resulting from a parking shortage.	**Mitigation Measure TRA-3A: Limit and Control On-Site Student Parking** The Menlo Park Small High School shall limit and control on-site student parking by requiring students to obtain a parking pass to park on-site. Parking passes may be free or fee-based. The number of passes available to students shall be based on the final design of the project, and shall be equal to the total number of permanent parking spaces on-site, less the number of faculty and staff at the school. The number of passes may be increased if the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B indicates an excess of faculty and staff parking. **Mitigation Measure TRA-3B: Designate, Limit, and Control Off-Campus Parking** To reduce the potential indirect effects associated with students searching for off-campus parking, the Menlo Park Small High School shall, by December 1, 2020: • Identify and designate off-campus parking areas for students. Such areas could be identified by engaging the city, local businesses, and other land uses in the Bayfront Area to identify underutilized or vacant parking areas that could be used by school staff and/or students during times when school is in session. • The amount of off-campus student	**Implementation:** The District shall incorporate these parking mitigation measures into appropriate school policy manuals and administrative procedures. **Timing:** As specified in the migitaion measure.	**Monitoring:** The District shall review all appropriate school policy manuals, administrative procedures, and operating protocols for inclusion of parking mitigation measures.	**Initials: _____** **Date: _____**

Table 5-1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
	parking to be provided shall be sufficient to make up for the difference between student demand for parking and the number of on-site student parking spaces. The amount of off-campus student parking necessary for the school may also be determined by the annual travel mode survey conducted in accordance with Mitigation Measure TRA-1B. • Once sufficient off-campus parking areas have been identified, the school shall prepare and implement a formal, written off-campus policy identifying where and when students (and staff, if necessary) may find available off-campus parking. The policy shall prohibit parking in areas where the school has not reached an agreement with the appropriate entity owning or controlling the parking. • The Menlo Park Small High School shall limit and control parking on designated off-campus areas by requiring students to obtain a pass to park in designated off-campus parking areas. Parking passes may be free or fee-based. • If sufficient off-campus parking areas cannot be identified, the Menlo Park Small High School shall incorporate additional measures into the school's TDM Program in accordance with Mitigation Measure TRA-1A until			

Table 5-1 Mitigation Monitoring and Reporting Program				
Impact	**Mitigation Measure**	**Implementation and Timing**	**Monitoring Responsibility**	**Verified Implementation**
	off-site parking demand matches the available off-site parking supply the school has obtained. **Mitigation Measure TRA-3C: Coordinate with the City on Parking Prohibitions** The Menlo Park Small High School shall coordinate with the City of Menlo Park on parking prohibitions on Jefferson Drive. The purpose of this coordination shall be to evaluate whether it is feasible to permit temporary, short-term, school-related parking that can be used for visitors, parent-teacher conferences, etc. in a manner that is consistent with the city's goals.			

APPENDIX I

Draft EIR / Notice of Availability of a Draft EIR Distribution List

SEQUOIA UNION HIGH SCHOOL DISTRICT
NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE MENLO PARK SMALL HIGH SCHOOL PROJECT

DISTRIBUTION LIST - JULY 2016

The following agencies and interested parties receive a copy of the Notice of Availability of a Draft Environmental Impact Report for the Sequoia Union High School District's Menlo Park Small High School project.

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The SUHSD sent copies to the following state agencies: • Department of Toxic Substances Control Sacramento Field Office 8800 Cal Center Drive Sacramento, CA 95826 Attn: Mellan Songco • California Department of Transportation District 4, P.O. BOX 23660, MS-10D Attn: Sandra Finegan Oakland, CA 94623-0660	Notice of Availability CD w/ Draft EIR

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Sequoia Union High School District
Menlo Park Small High School Project
Final Environmental Impact Report

APPENDIX J

Supplemental Traffic Analysis Memo (September 13, 2016) Prepared by Hexagon Transportation Consultants

HEXAGON TRANSPORTATION CONSULTANTS, INC.

Memorandum

Date: September 13, 2016

To: Matthew Zito, Sequoia Union High School District

Christopher Dugan, MIG|TRA Environmental Sciences

From: Gicela Del Rio, T.E. and Huy Tran, T.E.

Subject: Supplemental Traffic Analysis for the Proposed Menlo Park Small High School Project at 150 Jefferson Drive

Introduction

Hexagon Transportation Consultants, Inc. has completed a traffic impact analysis for the proposed Menlo Park Small High School project located at 150 Jefferson Drive in the City of Menlo Park, California.

The new school, as proposed, would serve up to 400 students in the grades 9 through 12 with 35 faculty/staff members, and would consist of an approximately 40,000 square-foot three-story building. The first year (2018-2019 school year), the school is anticipated to serve a maximum of 100 freshman students, increasing its size by 100 new freshman students each year thereafter until the maximum student enrollment of 400 students (2021-2022 school year) is reached. The proposed school is part of the Sequoia Union High School District (SUHSD) and is intended to alleviate increases in the District's existing and projected student enrollment. Although the proposed school would be open to all SUHSD students, the District anticipates the school would primarily serve students from the southern part of the SUHSD (Redwood City, Menlo Park, and East Palo Alto).

A traffic study for the proposed project was completed (dated June 2016) and incorporated into the project's Draft Environmental Impact Report (DEIR). Based on the comments received on the DEIR by various public agencies, it was determined that the following update and supplemental analyses should be performed:

1. Include the analysis of two additional intersections:
   - Bay Road and Marsh Road
   - Middlefield Road and Marsh Road
2. Update level of service analysis to include the following:
   - Existing/funded improvements at two intersections:
     - US 101 NB Ramps and Marsh Road
     - Constitution Drive and Chrysler Drive
   - Update the intersection level of service analysis to utilize the latest *Highway Capacity Manual* methodology (HCM2010).
3. Evaluate two of the study roadway segments (segments along Jefferson Drive and Independence Drive) using recent traffic count data

The results of the updated/supplemental analyses are described below.

Evaluation of Two Additional Intersections

As mentioned above, the proposed school is intended to alleviate increases in the SUHSD's existing and projected student enrollment, serving students that would otherwise attend other SUHSD high schools. The new school would not result in enrollment growth in the SUHSD; it would serve an existing demand that without the proposed school, would attend one of the existing schools. Therefore, it can be assumed that providing a new high school would result in some shorter diverted existing student trips. These existing student trips would represent new trips at intersections in the vicinity of the project site only. For this reason, only intersections providing direct access to the project area were selected for evaluation in the June 2016 traffic study. At intersections farther away from the project site, the proposed project trips would most likely represent diverted trips.

Comments from the County of San Mateo on the DEIR requested the analysis of two additional intersections:

- Bay Road and Marsh Road – City of Menlo Park intersection
- Middlefield Road and Marsh Road – Town of Atherton intersection

Since the above two intersection are relatively far away from the project site, assuming the project trips at these locations are new trips may result in double counting existing school trips already on the roadway network (and included in the existing traffic counts). Therefore, as part of the evaluation of these two additional intersections, student information from the two nearby SUHSD high schools was obtained in an effort to estimate how many of these existing students are currently driving through these intersections on their way to school.

Existing Student Information

The information provided by the SUHSD shows that 265 students from the area north of Marsh Road and east of Middlefield Road currently attend Menlo-Atherton High School (MAHS, located in the northeast corner of the Middlefield Road/Ringwood Avenue intersection) while 258 students from the Belle Haven area (north of Willow Road and roughly east of US 101) also attend MAHS.

Students from the Belle Haven area currently attending MAHS most likely would be diverted from Willow Road and Ringwood Avenue to Chilco Street to access the proposed new school. Therefore, these trips would not affect the two additional study intersections along Marsh Road. On the contrary, the majority of the students from the area north of Marsh Road must travel through the intersection of Middlefield Road and Marsh Road (and some through the intersection of Bay Road/Marsh Road) in order to access MAHS.

Ninety students from the Belle Haven and East Palo Alto areas currently attend Sequoia High School (SHS, located northwest of the proposed project site), and potentially could attend the proposed Small High School. However, due to the relatively long distance between these areas and SHS, without additional information, it cannot be determined with certainty how many of those students currently access SHS via US 101 versus the adjacent roadways. While accessing the proposed project site, these trips would most likely utilize Chilco Street and Bayfront Expressway, without having to travel on Marsh Road. Therefore, it was assumed that existing students from the Belle Haven and East Palo Alto areas would not affect the two additional study intersections on Marsh Road.

The existing student trip origin information (student home addresses) is shown graphically on Figures S1-S3 below.

Trip Credit Associated with Existing Students

For the analysis of the two additional intersections, it was assumed that ten percent (10%) of the MAHS students from the area north of Marsh Road would attend the proposed high school once it opens. This represents approximately 27 MAHS students changing their path of travel to attend the proposed new high school. Since it is not possible to determine without additional information the number of students from this area that currently use the Bay Road/Marsh Road intersection to access MAHS, no reduction was taken at this intersection to account for the existing diverted trips (all project trips were assumed to be new trips at the Bay Road/Marsh Road intersection). However, since most, if not all, of the existing student trips from this area would utilize the intersection of Middlefield Road/Marsh Road to access MAHS, credit for these students was taken at this location.

Figure S1
Existing Menlo-Atherton High School Students from Belle Haven Area

Source: Sequoia Union High School District

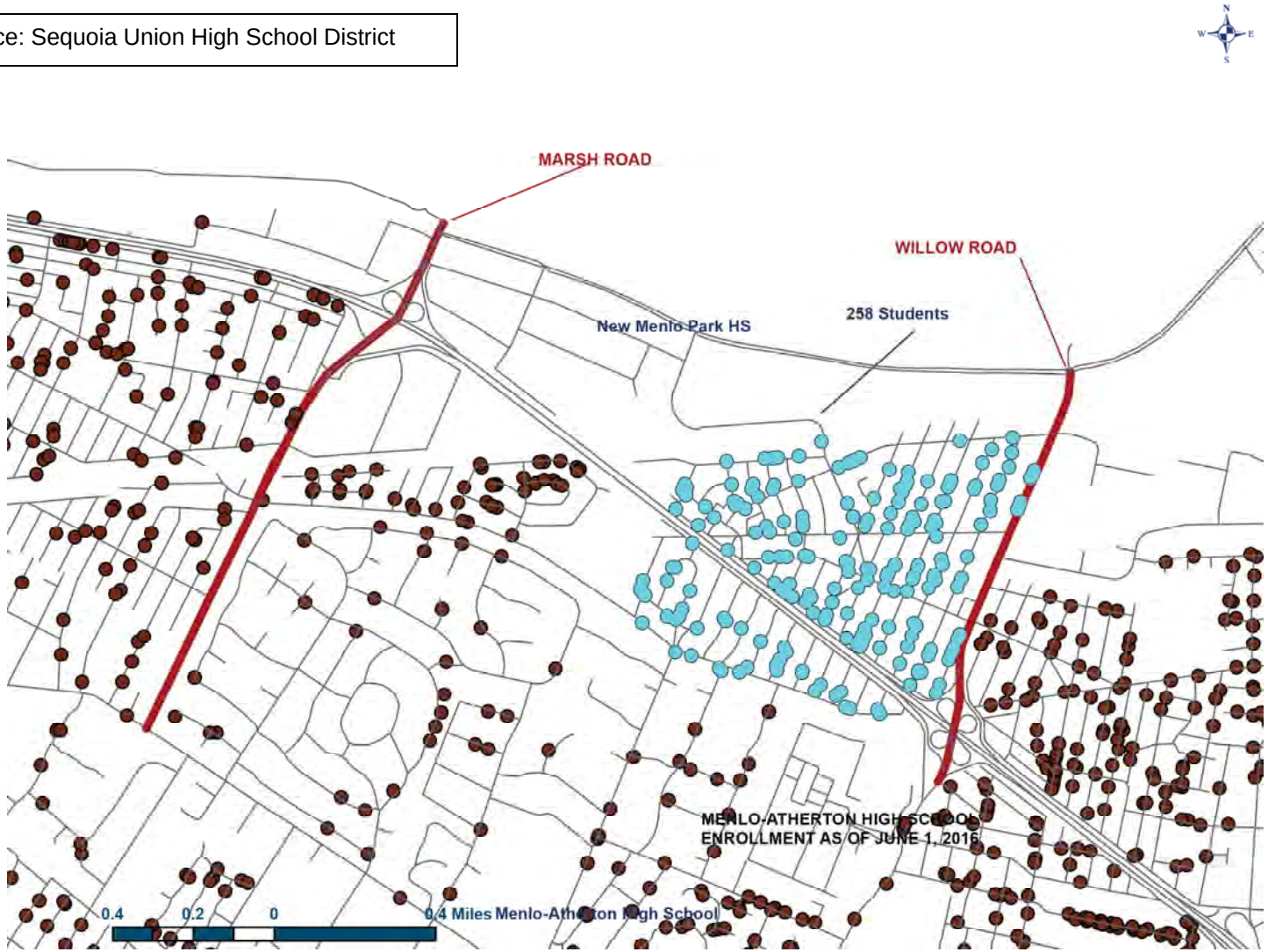


Figure S2
Existing Menlo-Atherton High School Students from Area North Of Marsh Road

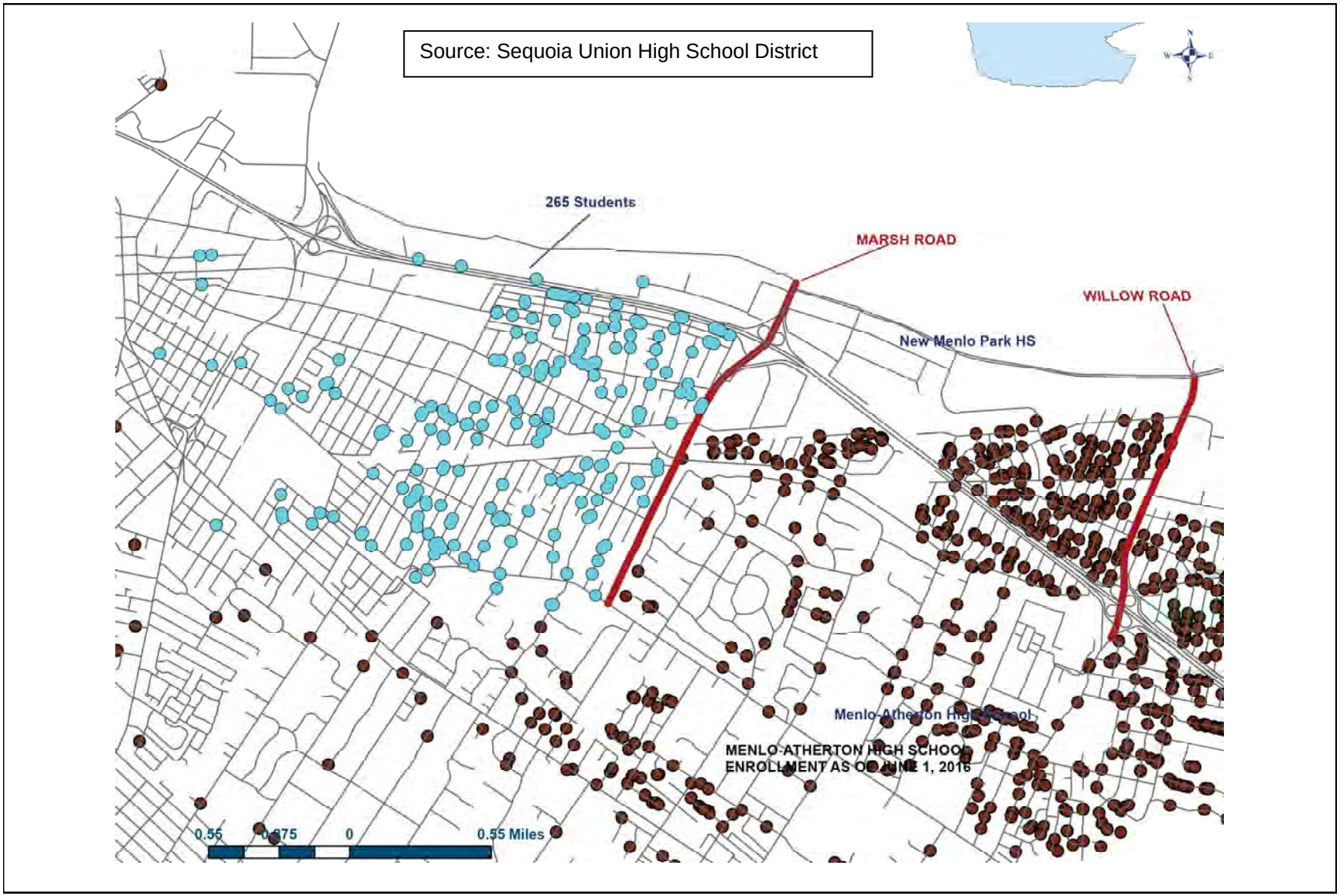
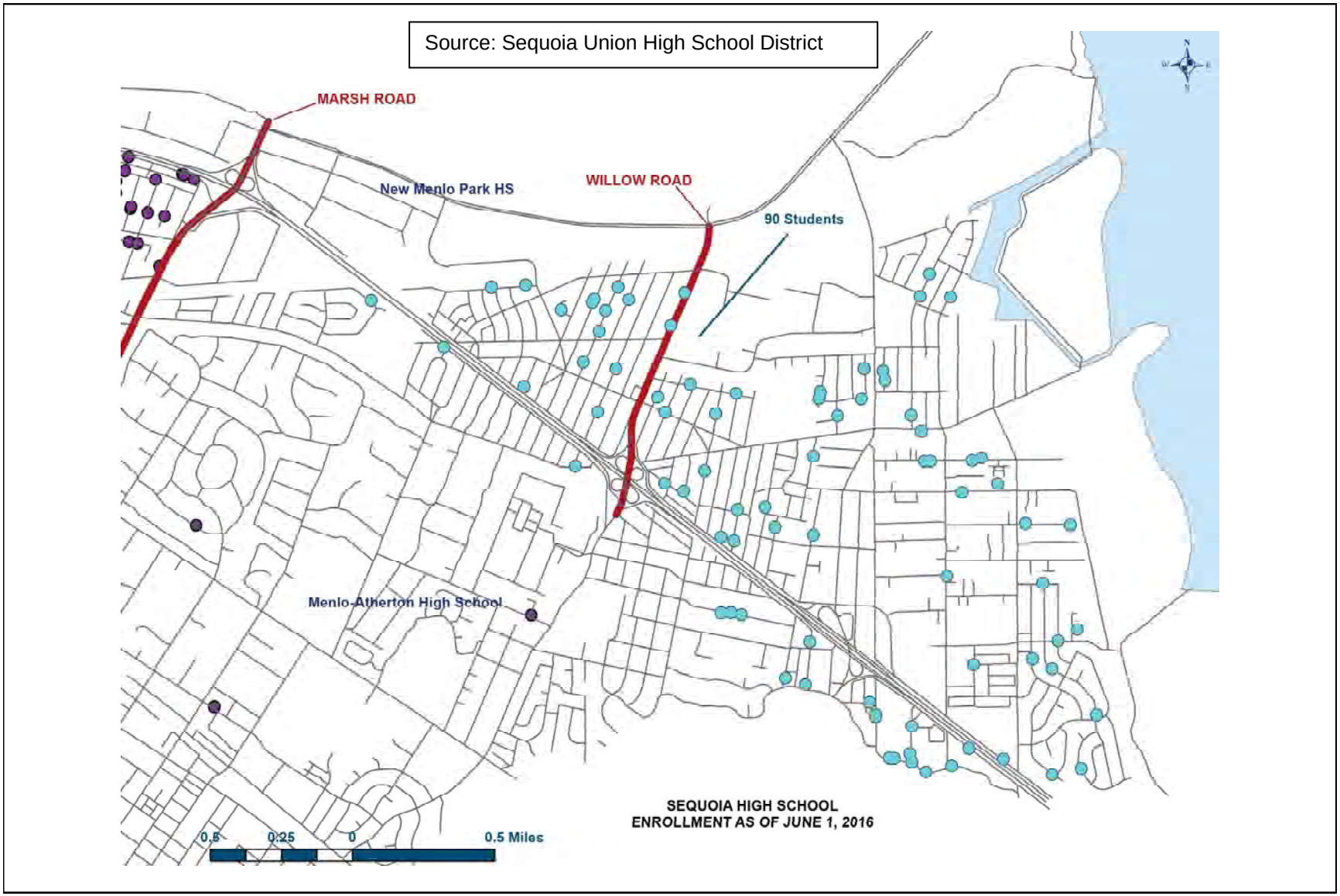


Figure S3
Existing Sequoia High School Students from Belle Haven and East Palo Alto Areas



The trip credit at the intersection of Middlefield Road and Marsh Road was estimated by applying the school trip generation rates to the assumed 27 existing MAHS students who would attend the new school. However, the diverted trip reduction was only taken for the AM peak-hour inbound trip generation since these trips are originating from home, corresponding to the existing student information. Outbound trips and PM peak-hour trips are less predictable and cannot be correlated to the existing student trip origin information since those trips usually have a second destination (AM outbound trips) or a different origin (PM peak-hour trips).

Analysis Results of Two Additional Intersections

Traffic counts for the analysis of the two additional intersections were obtained from the recently completed Menlo Park General Plan Update traffic study (Appendix K: Transportation Data, June 2016). The two additional intersections were analyzed utilizing the level of service methodology for signalized intersections in the HCM2010. The level of service methodology and standards are briefly summarized in the following sections, and described in more detail in the traffic impact analysis report for the project.

City of Menlo Park Intersection Level of Service Standard and Impact Criteria

The intersection of Bay Road/Marsh Road is located within the City of Menlo Park jurisdiction. According to the Transportation and Circulation section of the City of Menlo Park General Plan DEIR (dated June 1, 2016), the intersection of Bay Road and Marsh Road has a level of service standard of LOS D or better. City of Menlo Park level of service impact criteria for LOS D intersections is described below.

LOS D Intersections

Intersections operating at acceptable levels: a project is considered to have a potentially "significant" traffic impact if the addition of project traffic causes an intersection operating at LOS A through D to operate at an unacceptable level (LOS E or F) or have an increase of 23 seconds or greater in average vehicle delay, whichever comes first.

Intersections operating at unacceptable levels: a project is considered to have a potentially "significant" traffic impact if the addition of project traffic causes an increase of more than 0.8 seconds of average delay to vehicles on all critical movements for intersections operating at a near term LOS E or F.

Town of Atherton Intersection Level of Service Standard and Impact Criteria

The intersection of Middlefield Road/Marsh Road is located within the Town of Atherton jurisdiction. The Town of Atherton does not have an adopted level of service standard or intersection impact criteria. For this reason, level of service standards and impact criteria utilized for other recent traffic studies in the Town of Atherton were utilized for the analysis of this project. Therefore, the level of service standard for the intersection of Middlefield Road/Marsh Road is LOS D and its level of service impact criteria is described below.

Town of Atherton Intersections

A project is considered to have a potentially "significant" traffic impact if the addition of project traffic:

- causes an intersection operating at LOS A through D to operate at an unacceptable level (LOS E or F) or
- if the intersection is operating at unacceptable LOS E or F and the addition of project traffic causes the intersection average control delay to increase by 4 seconds or more.

Level of Service Results

The results of the supplemental intersection level of service analysis are summarized in Tables S1 and described below.

Existing Conditions

The supplemental intersection level of service analysis indicates that both additional study intersections currently operate at acceptable levels of service (LOS D or better) during both peak hours.

Existing Plus Project Conditions

With the addition of the project traffic associated with a 400-student school, both additional study intersections are projected to continue to operate at acceptable levels of service (LOS D or better) during both peak hours under existing plus project conditions.

Near-Term 2018 and 2021 Conditions

The supplemental intersection level of service analysis indicates that the study intersection of Bay Road and Marsh Road is projected to operate at acceptable LOS C during both peak hours under both 2018 and 2021 near-term traffic conditions. The intersection of Middlefield Road and Marsh Road is projected to operate at unacceptable LOS F during both peak hours under both near-term traffic conditions.

Near-Term 2018 and 2021 Plus Project Conditions

With the addition of the project traffic to the study intersections, the intersection of Bay Road and Marsh Road is projected to continue to operate at acceptable levels of service (LOS D or better) during both peak hours under both near-term 2018 and 2021 with project conditions. Therefore, the proposed project would not have a negative impact at this location.

The intersection of Middlefield Road and Marsh Road is projected to operate at unacceptable LOS F during both peak hours under both near-term 2018 and 2021 with project conditions. However, based on the applicable level of service impact criteria, the proposed project would not have a negative impact at this location under neither near-term plus project conditions scenarios.

Cumulative Plus Project Conditions

Under cumulative plus project conditions, the level of service analysis shows that the intersection of Bay Road and Marsh Road is projected to continue to operate at acceptable levels of service (LOS D or better) during both peak hours. Therefore, the proposed project would not have a negative cumulative impact at this location.

The intersection of Middlefield Road and Marsh Road is projected to operate at unacceptable LOS F during both peak hours under cumulative with project conditions. However, based on the applicable level of service impact criteria, the proposed project would not have a negative cumulative impact at this location under cumulative plus project conditions.

Updated Intersection Level of Service Analysis

The level of service analysis conducted for the June 2016 traffic study was completed based on the HCM2000 methodology and information provided by the City of Menlo Park at the initiation of the traffic analysis (preliminary intersection level of service calculations for the General Plan Circulation Update, dated January 2015 from TJKM Transportation Consultants, that included new traffic count information, intersection settings, and level of service methodology). Post review of the DEIR, the City of Menlo Park commented that the methodology should be updated to the HCM2010 methodology. Additionally, the City requested that a recently completed intersection improvement and a funded approved project mitigation be included in the updated analysis. The updated intersection lane geometry includes the following:

- US 101 NB Ramps and Marsh Road – add a second northbound right-turn lane (improvement already in place)
- Constitution Drive and Chrysler Drive – include signalization of the intersection in addition to separate southbound left-turn lane (from Constitution Drive to eastbound Chrysler Drive) and shared eastbound left-through and right-through lanes on Chrysler Drive (funded improvement).

As part of the level of service update process, the intersection settings were compared to the final intersection level of service calculations completed for the General Plan Update traffic study (June 2016) for consistency between the two analyses. Intersection traffic signal parameters for some of the study intersections were

different between the information that was originally available at the initiation of the traffic study (2015) and information contained in the General Plan Update document. Therefore, the level of service calculations also were updated for consistency with the General Plan Update.

Updated Level of Service Results

The updated level of service results are summarized in Tables S1. The results show that, with the updated level of service analysis, the following intersections reported in the project's June 2016 traffic study report to have a negative project impact, would no longer be impacted by the proposed project:

3. US 101 NB Ramps and Marsh Road – (AM and PM peak hour impact) this intersection would no longer be impacted under the near-term 2018 and near-term 2021 with project conditions scenarios.

4. US 101 SB Ramps and Marsh Road – (AM peak hour impact) this intersection would no longer be impacted under the near-term 2018 plus project conditions scenario.

5. Bayfront Expressway and Chrysler Drive – (PM peak hour impact) this intersection would no longer be impacted under the near-term 2018 plus project conditions scenario.

10. Bayfront Expressway and Chilco Street – (PM peak hour impact) this intersection would no longer be impacted under the near-term 2018 plus project conditions scenario.

Updated Roadway Segment Analysis

The June 2016 traffic study included the analysis of six roadway segments in the immediate vicinity of the project site. Traffic counts, were available, were obtained from the available traffic information from the General Plan Update traffic study. Counts at two study roadway segments not included in the General Plan Update were obtained from the *Commonwealth Corporate Center Project* DEIR. The segments are:

1. Jefferson Drive, south of Chrysler Drive
4. Independence Drive, north of Chrysler Drive

These two segment counts were determined to be outdated and City staff has requested that the roadway segment analysis be updated with recent counts.

For consistency with the roadway counts obtained from the General Plan Update, a growth factor was derived by comparing ADT volumes from the *Commonwealth Corporate Center Project* DEIR to ADT volumes from the General Plan Circulation Element. This growth factor was applied to the "old" counts to represent General Plan existing counts.

In addition, the recently completed General Plan Update classifies all the study roadway segments as Mixed-Use Collectors. This new roadway classification also was incorporated into the updated roadway segment analysis.

The updated roadway segment analysis is presented in Table S2 below. The following roadway segments identified as potential roadway impacts in the project's traffic study report would no longer meet the potential impact criteria as the result of the updated roadway classification:

1. Jefferson Drive, south of Chrysler Drive – no impact under both near-term plus project and cumulative plus project conditions

2. Chrysler Drive, between Jefferson Drive and Constitution Drive – no impact under near-term plus project conditions

4. Independence Drive, north of Chrysler Drive – no impact under both near-term plus project and cumulative plus project conditions

Table S1-1
Updated Intersection Level of Service Summary – Existing and Existing Plus Project

Study Number	Intersection	Existing Intersection Control	Jurisdiction	LOS Standard	Peak Hour	Existing Delay [1]	Existing LOS [2]	Existing plus Project (400 students) Delay [1]	Existing plus Project (400 students) LOS [2]
1	Bayfront Expressway and Marsh Road	Signal	State (with local approaches)/ CMP	D	AM	**200.6** [3]	**F**	**230.1** [3]	**F**
	SB Critical Delay					***87.2***	***F***	***87.2***	***F***
	WB Critical Delay					***76.8***	***E***	***76.8***	***E***
					PM	**856.8** [3]	**F**	**868.7** [3]	**F**
	SB Critical Delay					***115.2*** [3]	***F***	***115.2*** [3]	***F***
	WB Critical Delay					***96.9***	***F***	***96.9***	***F***
2	Constitution Drive and Independence Drive	2-Way Stop	Menlo Park	C	AM	22.3	C	**25.4**	**D**
					PM	10.6	B	11.0	B
3	US-101 NB Ramps and Marsh Road	Signal	State	D	AM	13.0	B	13.3	B
					PM	15.0	B	16.1	B
4	US-101 SB Ramps and Marsh Road	Signal	State	D	AM	19.6	B	22.1	C
					PM	18.7	B	19.1	B
5	Bayfront Expressway and Chrysler Drive	Signal	State (with local approaches)	D	AM	8.0	A	9.9	A
					PM	10.3	B	11.5	B
6	Constitution Drive and Chrysler Drive	4-Way Stop	Menlo Park	C	AM	8.8	A	10.9	B
					PM	14.4	B	18.8	C
7	Jefferson Drive and Chrysler Drive	1-Way Stop	Menlo Park	C	AM	9.8	A	10.2	B
					PM	9.9	A	10.7	B
8	Independence Drive and Chrysler Drive	1-Way Stop	Menlo Park	C	AM	9.4	A	10.1	B
					PM	9.6	A	9.7	A
9	Constitution Drive and Jefferson Drive	1-Way Stop	Menlo Park	C	AM	9.2	A	9.9	A
					PM	13.6	B	14.3	B
10	Bayfront Expressway and Chilco Street	Signal	State (with local approaches)	D	AM	30.9	C	21.9	C
					PM	11.8	B	12.0	B
11	Constitution Drive and Chilco Street	4-Way Stop	Menlo Park	C	AM	11.6	B	12.2	B
					PM	23.6	C	**25.0**	**D**
12	Bay Road and Marsh Road	Signal	Menlo Park	D	AM	18.9	B	19.6	B
					PM	23.1	C	23.6	C
13	Middlefield Road and Marsh Road	Signal	Atherton	D	AM	45.0	D	41.8	D
					PM	45.7	D	46.5	D

Notes:
[1] Delay = average seconds of delay per vehicle for all vehicles at signalized and 4-way stop-controlled intersections, and average worst approach delay for vehicles at 2-way/1-way stop-controlled intersections.
[2] LOS = level of service for the entire intersection at signalized and 4-way stop-controlled intersections, and for the worst approach at 2-way/1-way stop-controlled intersections.
[3] The HCM methodology for intersection analysis does not accurately calculate actual intersection operating conditions once the calculated intersection delay exceeds 100+ seconds. Once an intersection is calculated to operate with delays exceeding 100 seconds, any additional traffic to the intersection will increase the intersection delay exponentially, resulting in unrealistic excessive delays that most likely would never be experienced at an actual intersection. However, for the purpose of quantifying the projected increase in delay due to the proposed project, all calculated delays are reported, including those exceeding 100 seconds.
Entries denoted in **bold** indicate conditions that exceed the City's (and/or Caltrans for the applicable intersections) current level of service standard.

Table S1-2
Updated Intersection Level of Service Summary – Near-Term and Near-Term Plus Project

Study Number	Intersection	Jurisdiction	LOS Standard	Peak Hour	Near Term 2018 (No Project) Delay [1]	Near Term 2018 (No Project) LOS [2]	Near Term 2018 With Project (100 students) Delay [1]	Near Term 2018 With Project (100 students) LOS [2]	Near Term 2018 With Project (100 students) Change in Delay [3]	Near Term 2021 (No Project) Delay [1]	Near Term 2021 (No Project) LOS [2]	Near Term 2021 With Project (400 students) Delay [1]	Near Term 2021 With Project (400 students) LOS [2]	Near Term 2021 With Project (400 students) Change in Delay [3]	With Mitigations Delay [1]	With Mitigations LOS [2]
1	Bayfront Expressway and Marsh Road	State (with local approaches)/ CMP	D	AM	**316.3** [4]	**F**	**322.1** [4]	**F**	**5.8**	**333.0** [4]	**F**	**364.8** [4]	**F**	**31.8**	**271.4** [4]	**F**
	SB Critical Delay				***234.4*** [4]	***F***	***234.4*** [4]	***F***	***0.0***	***244.2*** [4]	***F***	***244.2*** [4]	***F***	***0.0***		
	WB Critical Delay				***76.8***	***E***	***76.8***	***E***	***0.0***	***76.7***	***E***	***76.7***	***E***	***0.0***		
				PM	**343.0** [4]	**F**	**344.9** [4]	**F**	**1.9**	**358.1** [4]	**F**	**375.7** [4]	**F**	**17.6**	**268.8** [4]	**F**
	SB Critical Delay				***135.0*** [4]	***F***	***135.0*** [4]	***F***	***0.0***	***144.0*** [4]	***F***	***144.0*** [4]	***F***	***0.0***		
	WB Critical Delay				***96.8***	***F***	***96.8***	***F***	***0.0***	***96.8***	***F***	***96.8***	***F***	***0.0***		
2	Constitution Drive and Independence Drive	Menlo Park	C	AM	**2293.5** [4]	**F**	**2664.1** [4]	**F**	**370.6**	**3057.3** [4]	**F**	**10000.0** [4]	**F**	**6942.8**	10.4	B
				PM	15.3	C	15.4	C	0.1	15.4	C	16.2	C	0.8		
3	US-101 NB Ramps and Marsh Road	State	D	AM	18.6	B	19.2	B	0.6	20.2	C	26.7	C	6.5		
				PM	36.2	D	36.8	D	0.6	43.8	D	48.5	D	4.7		
4	US-101 SB Ramps and Marsh Road	State	D	AM	45.6	D	47.2	D	1.6	52.7	D	**62.4**	**E**	**9.7**	**No Feasible**	
				PM	**62.4**	**E**	**63.0**	**E**	**0.6**	**69.4**	**E**	**74.9**	**E**	**5.5**	**Mitigation**	
5	Bayfront Expressway and Chrysler Drive	State (with local approaches)	D	AM	13.6	B	14.5	B	0.9	16.5	B	29.9	C	13.4		
				PM	**105.9** [4]	**F**	**106.0** [4]	**F**	**0.1**	**114.9** [4]	**F**	**116.9** [4]	**F**	**2.0**	**73.6**	**E**
	EB Critical Delay				*49.8*	*D*	*50.8*	*D*	*1.0*	*51.7*	*D*	***65.3***	***F***	***13.6***		
6	Constitution Drive and Chrysler Drive	Menlo Park	C	AM	**72.8**	**E**	**86.6**	**F**	**13.8**	**77.6**	**E**	**202.4** [4]	**F**	**124.8**	**36.2**	**D**
				PM	**202.0** [4]	**F**	**208.7** [4]	**F**	**6.7**	**215.9** [4]	**F**	**260.6** [4]	**F**	**44.7**	**125.9** [4]	**F**
7	Jefferson Drive and Chrysler Drive	Menlo Park	C	AM	12.1	B	11.8	B	-0.3	12.1	B	13.8	B	1.6		
				PM	**31.3**	**D**	**33.2**	**D**	**1.9**	**32.7**	**D**	**65.3**	**F**	**32.6**	13.7	B
8	Independence Drive and Chrysler Drive	Menlo Park	C	AM	14.4	B	14.7	B	0.2	14.6	B	16.1	C	1.5		
				PM	**29.1**	**D**	**29.4**	**D**	**0.3**	**29.7**	**D**	**32.1**	**D**	**2.4**	21.9	C
9	Constitution Drive and Jefferson Drive	Menlo Park	C	AM	20.0	C	20.5	C	0.5	20.1	C	22.9	C	2.9		
				PM	**47.6**	**E**	**48.1**	**E**	**0.6**	**53.5**	**F**	**63.0**	**F**	**9.5**	**51.1**	**F**
10	Bayfront Expressway and Chilco Street	State (with local approaches)	D	AM	34.1	C	34.5	C	0.4	40.7	D	44.4	D	3.7		
				PM	**79.5**	**E**	**79.6**	**E**	**0.1**	**88.1**	**F**	**90.0**	**F**	**1.9**	30.8	C
	EB Critical Delay				***77.6***	***F***	***78.1***	***F***	***0.5***	***80.6***	***F***	***85.3***	***F***	***4.7***		
11	Constitution Drive and Chilco Street	Menlo Park	C	AM	**136.5** [4]	**F**	**140.1** [4]	**F**	**3.6**	**144.5** [4]	**F**	**156.6** [4]	**F**	**12.1**	**37.9**	**D**
				PM	**281.7** [4]	**F**	**282.7** [4]	**F**	**1.0**	**299.7** [4]	**F**	**309.6** [4]	**F**	**9.9**	**47.2**	**D**
12	Bay Road and Marsh Road	Menlo Park	D	AM	30.1	C	30.5	C	0.4	33.3	C	37.4	D	4.1		
				PM	23.5	C	23.6	C	0.1	24.4	C	25.0	C	0.6		
13	Middlefield Road and Marsh Road	Atherton	D	AM	**150.0** [4]	**F**	**149.8** [4]	**F**	**-0.2**	**159.8** [4]	**F**	**162.6** [4]	**F**	**2.8**		
				PM	**87.6**	**F**	**87.1**	**F**	**-0.5**	**85.8**	**F**	**87.4**	**F**	**1.6**		

Notes:

[1] Delay = average seconds of delay per vehicle for all vehicles at signalized and 4-way stop-controlled intersections, and average worst approach delay for vehicles at 2-way/1-way stop-controlled intersections.

[2] LOS = level of service for the entire intersection at signalized and 4-way stop-controlled intersections, and for the worst approach at 2-way/1-way stop-controlled intersections.

[3] Level of service impact thresholds include a change in the average intersection delay of 23 seconds or more at intersections operating at acceptable levels and a change in all critical movements of 0.8 seconds or more at City of Menlo Park intersections or a change of 0.8 seconds or more on the local approaches' most critical movement at State-controlled intersections operating at substandard levels. Level of service impact threshold for State intersections operating at unacceptable levels of service (LOS D, E, or F) is the increase of 4 or more seconds to the average intersection delay.

[4] The HCM methodology for intersection analysis does not accurately calculate actual intersection operating conditions once the calculated intersection delay exceeds 100+ seconds. Once an intersection is calculated to operate with delays exceeding 100 seconds, any additional traffic to the intersection will increase the intersection delay exponentially, resulting in unrealistic excessive delays that most likely would never be experienced at an actual intersection. However, for the purpose of quantifying the projected increase in delay due to the proposed project, all calculated delays are reported, including those exceeding 100 seconds.

Entries denoted in **bold** indicate conditions that exceed the City's (and/or Caltrans for the applicable intersections) current level of service standard.

- Denotes significant impact based on City of Menlo Park criteria.
- Denotes significant impact based on Caltrans criteria.

Table S1-3
Updated Intersection Level of Service Summary – Cumulative and Cumulative Plus Project

Study Number	Intersection	Jurisdiction	LOS Standard	Peak Hour	Cumulative (No Project) Delay [1]	Cumulative (No Project) LOS [2]	Cumulative with Project (400 students) Delay [1]	Cumulative with Project (400 students) LOS [2]	Change in Delay [3]	With Mitigations Delay [1]	With Mitigations LOS [2]
1	Bayfront Expressway and Marsh Road	State (with local approaches)/ CMP	D	AM	**394.3** [4]	**F**	**426.7** [4]	**F**	**32.4**	**320.8** [4]	**F**
	SB Critical Delay				***252.7*** [4]	***F***	***252.5*** [4]	***F***	***-0.2***		
	WB Critical Delay				***76.6***	***E***	***76.6***	***E***	***0.0***		
				PM	**402.2** [4]	**F**	**420.1** [4]	**F**	**17.9**	**309.5** [4]	**F**
	SB Critical Delay				***151.9*** [4]	***F***	***151.9*** [4]	***F***	***0.0***		
	WB Critical Delay				***96.7***	***F***	***96.7***	***F***	***0.0***		
2	Constitution Drive and Independence Drive	Menlo Park	C	AM	***4266.2*** [4]	***F***	**10000.0** [4]	**F**	**5733.8**	10.5	B
				PM	15.6	C	16.4	C	0.8		
3	US-101 NB Ramps and Marsh Road	State	D	AM	32.5	C	41.3	D	8.8	**No Feasible Mitigation**	
				PM	54.4	D	**59.2**	**E**	**4.8**		
4	US-101 SB Ramps and Marsh Road	State	D	AM	**69.6**	**E**	**79.5**	**E**	**9.9**	**No Feasible Mitigation**	
				PM	**87.4**	**F**	**92.9**	**F**	**5.5**		
5	Bayfront Expressway and Chrysler Drive	State (with local approaches)	D	AM	18.4	B	30.9	C	12.5		
				PM	**125.2** [4]	**F**	**127.1** [4]	**F**	**1.9**	**84.0**	**F**
	EB Critical Delay				*53.7*	*D*	***67.7***	***F***	***14.0***		
6	Constitution Drive and Chrysler Drive	Menlo Park	C	AM	**84.5**	**F**	**217.3** [4]	**F**	**132.8**	**36.9**	**D**
				PM	**230.8** [4]	**F**	**267.3** [4]	**F**	**36.5**	**131.3** [4]	**F**
7	Jefferson Drive and Chrysler Drive	Menlo Park	C	AM	12.4	B	14.1	B	1.7		
				PM	**34.2**	**D**	**69.5**	**F**	**35.4**	14.3	B
8	Independence Drive and Chrysler Drive	Menlo Park	C	AM	14.7	B	16.3	C	1.6		
				PM	**30.8**	**D**	**33.6**	**D**	**2.8**	22.6	C
9	Constitution Drive and Jefferson Drive	Menlo Park	C	AM	20.2	C	23.0	C	2.9		
				PM	**58.0**	**F**	**69.8**	**F**	**11.8**	**56.1**	**F**
10	Bayfront Expressway and Chilco Street	State (with local approaches)	D	AM	**171.7** [4]	**F**	**176.4** [4]	**F**	**4.7**	**131.4** [4]	**F**
	EB Critical Delay				*41.2*	*D*	*41.0*	*D*	*-0.3*		
				PM	**162.7** [4]	**F**	**165.6** [4]	**F**	**2.9**	**109.4** [4]	**F**
	EB Critical Delay				***404.1*** [4]	***F***	***412.5*** [4]	***F***	***8.4***		
11	Constitution Drive and Chilco Street	Menlo Park	C	AM	**514.8** [4]	**F**	**537.5** [4]	**F**	**22.7**	**181.5** [4]	**F**
				PM	**785.4** [4]	**F**	**789.6** [4]	**F**	**4.2**	**181.9** [4]	**F**
12	Bay Road and Marsh Road	Menlo Park	D	AM	48.5	D	54.6	D	6.1		
				PM	27.5	C	28.1	C	0.6		
13	Middlefield Road and Marsh Road	Atherton	D	AM	**241.2** [4]	**F**	**245.0** [4]	**F**	**3.8**		
				PM	**125.3** [4]	**F**	**127.7** [4]	**F**	**2.4**		

Notes:

[1] Delay = average seconds of delay per vehicle for all vehicles at signalized and 4-way stop-controlled intersections, and average worst approach delay for vehicles at 2-way/1-way stop-controlled intersections.

[2] LOS = level of service for the entire intersection at signalized and 4-way stop-controlled intersections, and for the worst approach at 2-way/1-way stop-controlled intersections.

[3] Level of service impact thresholds include a change in the average intersection delay of 23 seconds or more at intersections operating at acceptable levels and a change in all critical movements of 0.8 seconds or more at City of Menlo Park intersections or a change of 0.8 seconds or more on the local approaches' most critical movement at State-controlled intersections operating at substandard levels. Level of service impact threshold for State intersections operating at unacceptable levels of service (LOS D, E, or F) is the increase of 4 or more seconds to the average intersection delay.

[4] The HCM methodology for intersection analysis does not accurately calculate actual intersection operating conditions once the calculated intersection delay exceeds 100+ seconds. Once an intersection is calculated to operate with delays exceeding 100 seconds, any additional traffic to the intersection will increase the intersection delay exponentially, resulting in unrealistic excessive delays that most likely would never be experienced at an actual intersection. However, for the purpose of quantifying the projected increase in delay due to the proposed project, all calculated delays are reported, including those exceeding 100 seconds.

Entries denoted in **bold** indicate conditions that exceed the City's (and/or Caltrans for the applicable intersections) current level of service standard.

- Denotes significant impact based on City of Menlo Park criteria.

- Denotes significant impact based on Caltrans criteria.

Table S2
Updated Roadway Segment Analysis Results

	Roadway Segment	Classification	Capacity	Project Trips	Near Term ADT	Near Term Plus Project			Cumulative ADT	Cumulative Plus Project		
						Near Term Plus Project	% Change from Near-Term	Potentially Significant Impact[2]		Cumulative Plus Project	% Change from Cumulative	Potentially Significant Impact[2]
1	Jefferson Drive, south of Chrysler Drive [1]	Mixed-Use Collector	10,000	388	2,575	2,963	15.1%	No	2,785	3,173	13.9%	No
2	Chrysler Drive, between Jefferson Drive and Constitution Drive	Mixed-Use Collector	10,000	350	8,370	8,720	4.2%	No	8,800	9,150	4.0%	**Yes**
3	Chrysler Drive, between Constitution Drive and Bayfront Expressway	Mixed-Use Collector	10,000	**311**	**13,670**	**13,981**	**2.3%**	**Yes**	**14,840**	**15,151**	**2.1%**	**Yes**
4	Independence Drive, north of Chrysler Drive [1]	Mixed-Use Collector	10,000	39	5,934	5,973	0.7%	No	6,094	6,133	0.6%	No
5	Constitution Drive, between Jefferson Drive and Chilco Street	Mixed-Use Collector	10,000	60	5,410	5,470	1.1%	No	5,750	5,810	1.0%	No
6	Chilco Street, between Constitution Drive and Bayfront Expressway	Mixed-Use Collector	10,000	28	8,990	9,018	0.3%	No	**10,140**	**10,168**	0.3%	No

Notes:
Roadway classification as identified in the City of Menlo Park General Plan Circulation Element, October 2015 Draft.
Roadway capacities were obtained from the City of Menlo Park Transporation Impact Analysis Guidelines document.
ADT = Average Daily Traffic
Existing ADT information obtained from the *Circulation Existing Conditions* report (City of Menlo Park General Plan), January 2015, with the exception of segments #1 and #4.
[1] Existing ADT for segments #1 and #4 obtained from the *Commonwealth Corporate Center Project* Draft Environmental Impact Report, February 2014. These volumes were factored to represent General Plan existing conditions by applying a growth factor derived by comparing ADT volumes from the Commonwealth report to ADT volumes from the General Plan Circulation Element.
[2] The City of Menlo Park identifies the following roadway segment capacity thresholds as potential impact criteria:
Collector Street - Potential impact if ADT is >9,000 vehicles and project adds >50 trips, or ADT is >5,000 and project increases ADT by 12.5%, or ADT is <5,000 and project increases ADT by 25%.
Bold indicates ADT values that exceed the acceptable capacity.

Conclusion

The updated analysis resulted in

- four less intersection impact under near-term 2018 plus project conditions,
- one less intersection impact under near-term 2021 plus project conditions,
- three less roadway segment impacts under near-term plus project conditions, and
- two less roadway impacts under cumulative plus project conditions.

This concludes the supplemental analyses for the proposed Menlo Park Small High School project. Please feel free to contact us with any questions.

APPENDIX K

Greenhouse Gas Emissions Estimate

Menlo Park Small High School - Response to Comments Operational Run

San Mateo County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
High School	45.00	1000sqft	0.53	45,000.00	0
Parking Lot	47.91	1000sqft	1.10	47,910.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	70
Climate Zone	5			**Operational Year**	2018
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	641.35	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - PTG - Acreage changed based on the impervious area of the roof.

Vehicle Trips - PTG - Trips altered to match trips generated by a 400 person school (496 trips during peak hour then added an additional 20% to account for off peak-hour trips). Weekend trips estimated to be 10% of what a weekday would be.

Construction Off-road Equipment Mitigation -

Table Name	Column Name	Default Value	New Value
tblArchitecturalCoating	EF_Nonresidential_Exterior	150.00	250.00
tblArchitecturalCoating	EF_Nonresidential_Interior	100.00	250.00
tblArchitecturalCoating	EF_Residential_Exterior	150.00	250.00
tblArchitecturalCoating	EF_Residential_Interior	100.00	250.00
tblLandUse	LotAcreage	1.03	0.53
tblProjectCharacteristics	OperationalYear	2014	2018
tblVehicleTrips	ST_TR	4.37	1.32
tblVehicleTrips	SU_TR	1.79	1.32
tblVehicleTrips	WD_TR	12.89	13.23

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2017	0.9075	2.4694	2.1814	3.3600e-003	0.0628	0.1488	0.2116	0.0208	0.1427	0.1634	0.0000	282.3214	282.3214	0.0496	0.0000	283.3625
Total	**0.9075**	**2.4694**	**2.1814**	**3.3600e-003**	**0.0628**	**0.1488**	**0.2116**	**0.0208**	**0.1427**	**0.1634**	**0.0000**	**282.3214**	**282.3214**	**0.0496**	**0.0000**	**283.3625**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2017	0.9075	2.4694	2.1814	3.3600e-003	0.0542	0.1488	0.2030	0.0164	0.1427	0.1590	0.0000	282.3211	282.3211	0.0496	0.0000	283.3622
Total	**0.9075**	**2.4694**	**2.1814**	**3.3600e-003**	**0.0542**	**0.1488**	**0.2030**	**0.0164**	**0.1427**	**0.1590**	**0.0000**	**282.3211**	**282.3211**	**0.0496**	**0.0000**	**283.3622**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**13.69**	**0.00**	**4.06**	**21.20**	**0.00**	**2.70**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3872	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6600e-003	1.6600e-003	0.0000	0.0000	1.7600e-003
Energy	4.1900e-003	0.0381	0.0320	2.3000e-004		2.8900e-003	2.8900e-003		2.8900e-003	2.8900e-003	0.0000	118.7511	118.7511	4.2900e-003	1.4800e-003	119.3009
Mobile	0.2264	0.4635	2.3894	5.6500e-003	0.4277	6.5200e-003	0.4342	0.1147	6.0100e-003	0.1207	0.0000	417.5755	417.5755	0.0174	0.0000	417.9398
Waste						0.0000	0.0000		0.0000	0.0000	11.8750	0.0000	11.8750	0.7018	0.0000	26.6126
Water						0.0000	0.0000		0.0000	0.0000	0.4740	6.2642	6.7383	0.0490	1.2100e-003	8.1412
Total	**0.6178**	**0.5016**	**2.4222**	**5.8800e-003**	**0.4277**	**9.4100e-003**	**0.4371**	**0.1147**	**8.9000e-003**	**0.1236**	**12.3490**	**542.5924**	**554.9414**	**0.7724**	**2.6900e-003**	**571.9962**

2.2 Overall Operational

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.3872	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6600e-003	1.6600e-003	0.0000	0.0000	1.7600e-003
Energy	4.1900e-003	0.0381	0.0320	2.3000e-004		2.8900e-003	2.8900e-003		2.8900e-003	2.8900e-003	0.0000	118.7511	118.7511	4.2900e-003	1.4800e-003	119.3009
Mobile	0.2264	0.4635	2.3894	5.6500e-003	0.4277	6.5200e-003	0.4342	0.1147	6.0100e-003	0.1207	0.0000	417.5755	417.5755	0.0174	0.0000	417.9398
Waste						0.0000	0.0000		0.0000	0.0000	11.8750	0.0000	11.8750	0.7018	0.0000	26.6126
Water						0.0000	0.0000		0.0000	0.0000	0.4740	6.2642	6.7383	0.0490	1.2100e-003	8.1405
Total	**0.6178**	**0.5016**	**2.4222**	**5.8800e-003**	**0.4277**	**9.4100e-003**	**0.4371**	**0.1147**	**8.9000e-003**	**0.1236**	**12.3490**	**542.5924**	**554.9414**	**0.7724**	**2.6900e-003**	**571.9955**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Demolition	Demolition	1/1/2017	1/27/2017	5	20	
2	Site Preparation	Site Preparation	1/28/2017	1/31/2017	5	2	
3	Grading	Grading	2/1/2017	2/6/2017	5	4	
4	Building Construction	Building Construction	2/7/2017	11/13/2017	5	200	
5	Paving	Paving	11/14/2017	11/27/2017	5	10	
6	Architectural Coating	Architectural Coating	11/28/2017	12/11/2017	5	10	

Acres of Grading (Site Preparation Phase): 1

Acres of Grading (Grading Phase): 1.5

Acres of Paving: 0

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 69,656; Non-Residential Outdoor: 23,219 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	1	6.00	9	0.56
Demolition	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Cranes	1	6.00	226	0.29
Building Construction	Forklifts	1	6.00	89	0.20
Site Preparation	Graders	1	8.00	174	0.41
Paving	Pavers	1	6.00	125	0.42
Paving	Rollers	1	7.00	80	0.38
Demolition	Rubber Tired Dozers	1	8.00	255	0.40
Grading	Rubber Tired Dozers	1	6.00	255	0.40
Building Construction	Tractors/Loaders/Backhoes	1	6.00	97	0.37
Demolition	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Grading	Graders	1	6.00	174	0.41
Paving	Paving Equipment	1	8.00	130	0.36
Site Preparation	Rubber Tired Dozers	1	7.00	255	0.40
Building Construction	Welders	3	8.00	46	0.45

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Demolition	5	13.00	0.00	0.00	12.40	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Site Preparation	3	8.00	0.00	0.00	12.40	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Grading	3	8.00	0.00	0.00	12.40	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	7	39.00	15.00	0.00	12.40	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	5	13.00	0.00	0.00	12.40	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	8.00	0.00	0.00	12.40	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Water Exposed Area

Clean Paved Roads

3.2 Demolition - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0272	0.2659	0.2087	2.4000e-004		0.0161	0.0161		0.0150	0.0150	0.0000	22.2938	22.2938	5.6600e-003	0.0000	22.4126
Total	**0.0272**	**0.2659**	**0.2087**	**2.4000e-004**		**0.0161**	**0.0161**		**0.0150**	**0.0150**	**0.0000**	**22.2938**	**22.2938**	**5.6600e-003**	**0.0000**	**22.4126**

3.2 Demolition - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.1000e-004	6.5000e-004	6.1400e-003	1.0000e-005	1.1700e-003	1.0000e-005	1.1800e-003	3.1000e-004	1.0000e-005	3.2000e-004	0.0000	1.0204	1.0204	5.0000e-005	0.0000	1.0215
Total	**4.1000e-004**	**6.5000e-004**	**6.1400e-003**	**1.0000e-005**	**1.1700e-003**	**1.0000e-005**	**1.1800e-003**	**3.1000e-004**	**1.0000e-005**	**3.2000e-004**	**0.0000**	**1.0204**	**1.0204**	**5.0000e-005**	**0.0000**	**1.0215**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0272	0.2659	0.2087	2.4000e-004		0.0161	0.0161		0.0150	0.0150	0.0000	22.2938	22.2938	5.6600e-003	0.0000	22.4125
Total	**0.0272**	**0.2659**	**0.2087**	**2.4000e-004**		**0.0161**	**0.0161**		**0.0150**	**0.0150**	**0.0000**	**22.2938**	**22.2938**	**5.6600e-003**	**0.0000**	**22.4125**

3.2 Demolition - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	4.1000e-004	6.5000e-004	6.1400e-003	1.0000e-005	1.1700e-003	1.0000e-005	1.1800e-003	3.1000e-004	1.0000e-005	3.2000e-004	0.0000	1.0204	1.0204	5.0000e-005	0.0000	1.0215
Total	**4.1000e-004**	**6.5000e-004**	**6.1400e-003**	**1.0000e-005**	**1.1700e-003**	**1.0000e-005**	**1.1800e-003**	**3.1000e-004**	**1.0000e-005**	**3.2000e-004**	**0.0000**	**1.0204**	**1.0204**	**5.0000e-005**	**0.0000**	**1.0215**

3.3 Site Preparation - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					5.8000e-003	0.0000	5.8000e-003	2.9500e-003	0.0000	2.9500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.3100e-003	0.0242	0.0159	2.0000e-005		1.3100e-003	1.3100e-003		1.2000e-003	1.2000e-003	0.0000	1.5895	1.5895	4.9000e-004	0.0000	1.5997
Total	**2.3100e-003**	**0.0242**	**0.0159**	**2.0000e-005**	**5.8000e-003**	**1.3100e-003**	**7.1100e-003**	**2.9500e-003**	**1.2000e-003**	**4.1500e-003**	**0.0000**	**1.5895**	**1.5895**	**4.9000e-004**	**0.0000**	**1.5997**

3.3 Site Preparation - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	4.0000e-005	3.8000e-004	0.0000	7.0000e-005	0.0000	7.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0628	0.0628	0.0000	0.0000	0.0629
Total	**3.0000e-005**	**4.0000e-005**	**3.8000e-004**	**0.0000**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0628**	**0.0628**	**0.0000**	**0.0000**	**0.0629**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					2.6100e-003	0.0000	2.6100e-003	1.3300e-003	0.0000	1.3300e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.3100e-003	0.0242	0.0159	2.0000e-005		1.3100e-003	1.3100e-003		1.2000e-003	1.2000e-003	0.0000	1.5895	1.5895	4.9000e-004	0.0000	1.5997
Total	**2.3100e-003**	**0.0242**	**0.0159**	**2.0000e-005**	**2.6100e-003**	**1.3100e-003**	**3.9200e-003**	**1.3300e-003**	**1.2000e-003**	**2.5300e-003**	**0.0000**	**1.5895**	**1.5895**	**4.9000e-004**	**0.0000**	**1.5997**

3.3 Site Preparation - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	3.0000e-005	4.0000e-005	3.8000e-004	0.0000	7.0000e-005	0.0000	7.0000e-005	2.0000e-005	0.0000	2.0000e-005	0.0000	0.0628	0.0628	0.0000	0.0000	0.0629
Total	**3.0000e-005**	**4.0000e-005**	**3.8000e-004**	**0.0000**	**7.0000e-005**	**0.0000**	**7.0000e-005**	**2.0000e-005**	**0.0000**	**2.0000e-005**	**0.0000**	**0.0628**	**0.0628**	**0.0000**	**0.0000**	**0.0629**

3.4 Grading - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					9.8300e-003	0.0000	9.8300e-003	5.0500e-003	0.0000	5.0500e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.7700e-003	0.0396	0.0264	3.0000e-005		2.1300e-003	2.1300e-003		1.9600e-003	1.9600e-003	0.0000	2.6112	2.6112	8.0000e-004	0.0000	2.6280
Total	**3.7700e-003**	**0.0396**	**0.0264**	**3.0000e-005**	**9.8300e-003**	**2.1300e-003**	**0.0120**	**5.0500e-003**	**1.9600e-003**	**7.0100e-003**	**0.0000**	**2.6112**	**2.6112**	**8.0000e-004**	**0.0000**	**2.6280**

3.4 Grading - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	8.0000e-005	7.6000e-004	0.0000	1.4000e-004	0.0000	1.5000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1256	0.1256	1.0000e-005	0.0000	0.1257
Total	**5.0000e-005**	**8.0000e-005**	**7.6000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**1.5000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1256**	**0.1256**	**1.0000e-005**	**0.0000**	**0.1257**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					4.4200e-003	0.0000	4.4200e-003	2.2700e-003	0.0000	2.2700e-003	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	3.7700e-003	0.0396	0.0264	3.0000e-005		2.1300e-003	2.1300e-003		1.9600e-003	1.9600e-003	0.0000	2.6112	2.6112	8.0000e-004	0.0000	2.6280
Total	**3.7700e-003**	**0.0396**	**0.0264**	**3.0000e-005**	**4.4200e-003**	**2.1300e-003**	**6.5500e-003**	**2.2700e-003**	**1.9600e-003**	**4.2300e-003**	**0.0000**	**2.6112**	**2.6112**	**8.0000e-004**	**0.0000**	**2.6280**

3.4 Grading - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.0000e-005	8.0000e-005	7.6000e-004	0.0000	1.4000e-004	0.0000	1.5000e-004	4.0000e-005	0.0000	4.0000e-005	0.0000	0.1256	0.1256	1.0000e-005	0.0000	0.1257
Total	**5.0000e-005**	**8.0000e-005**	**7.6000e-004**	**0.0000**	**1.4000e-004**	**0.0000**	**1.5000e-004**	**4.0000e-005**	**0.0000**	**4.0000e-005**	**0.0000**	**0.1256**	**0.1256**	**1.0000e-005**	**0.0000**	**0.1257**

3.5 Building Construction - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2955	1.9109	1.4311	2.2000e-003		0.1226	0.1226		0.1182	0.1182	0.0000	184.5473	184.5473	0.0387	0.0000	185.3605
Total	**0.2955**	**1.9109**	**1.4311**	**2.2000e-003**		**0.1226**	**0.1226**		**0.1182**	**0.1182**	**0.0000**	**184.5473**	**184.5473**	**0.0387**	**0.0000**	**185.3605**

3.5 Building Construction - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0184	0.1367	0.2484	3.5000e-004	9.5800e-003	1.8800e-003	0.0115	2.7500e-003	1.7300e-003	4.4800e-003	0.0000	31.2466	31.2466	2.4000e-004	0.0000	31.2517
Worker	0.0124	0.0195	0.1841	4.1000e-004	0.0353	2.7000e-004	0.0355	9.3800e-003	2.5000e-004	9.6300e-003	0.0000	30.6106	30.6106	1.5900e-003	0.0000	30.6440
Total	**0.0308**	**0.1562**	**0.4326**	**7.6000e-004**	**0.0448**	**2.1500e-003**	**0.0470**	**0.0121**	**1.9800e-003**	**0.0141**	**0.0000**	**61.8572**	**61.8572**	**1.8300e-003**	**0.0000**	**61.8957**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2955	1.9109	1.4311	2.2000e-003		0.1226	0.1226		0.1182	0.1182	0.0000	184.5471	184.5471	0.0387	0.0000	185.3603
Total	**0.2955**	**1.9109**	**1.4311**	**2.2000e-003**		**0.1226**	**0.1226**		**0.1182**	**0.1182**	**0.0000**	**184.5471**	**184.5471**	**0.0387**	**0.0000**	**185.3603**

3.5 Building Construction - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0184	0.1367	0.2484	3.5000e-004	9.5800e-003	1.8800e-003	0.0115	2.7500e-003	1.7300e-003	4.4800e-003	0.0000	31.2466	31.2466	2.4000e-004	0.0000	31.2517
Worker	0.0124	0.0195	0.1841	4.1000e-004	0.0353	2.7000e-004	0.0355	9.3800e-003	2.5000e-004	9.6300e-003	0.0000	30.6106	30.6106	1.5900e-003	0.0000	30.6440
Total	**0.0308**	**0.1562**	**0.4326**	**7.6000e-004**	**0.0448**	**2.1500e-003**	**0.0470**	**0.0121**	**1.9800e-003**	**0.0141**	**0.0000**	**61.8572**	**61.8572**	**1.8300e-003**	**0.0000**	**61.8957**

3.6 Paving - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.9300e-003	0.0605	0.0452	7.0000e-005		3.6700e-003	3.6700e-003		3.3800e-003	3.3800e-003	0.0000	6.1129	6.1129	1.8400e-003	0.0000	6.1515
Paving	1.4400e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**7.3700e-003**	**0.0605**	**0.0452**	**7.0000e-005**		**3.6700e-003**	**3.6700e-003**		**3.3800e-003**	**3.3800e-003**	**0.0000**	**6.1129**	**6.1129**	**1.8400e-003**	**0.0000**	**6.1515**

3.6 Paving - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	3.3000e-004	3.0700e-003	1.0000e-005	5.9000e-004	0.0000	5.9000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.5102	0.5102	3.0000e-005	0.0000	0.5107
Total	**2.1000e-004**	**3.3000e-004**	**3.0700e-003**	**1.0000e-005**	**5.9000e-004**	**0.0000**	**5.9000e-004**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**0.5102**	**0.5102**	**3.0000e-005**	**0.0000**	**0.5107**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	5.9300e-003	0.0605	0.0452	7.0000e-005		3.6700e-003	3.6700e-003		3.3800e-003	3.3800e-003	0.0000	6.1129	6.1129	1.8400e-003	0.0000	6.1515
Paving	1.4400e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**7.3700e-003**	**0.0605**	**0.0452**	**7.0000e-005**		**3.6700e-003**	**3.6700e-003**		**3.3800e-003**	**3.3800e-003**	**0.0000**	**6.1129**	**6.1129**	**1.8400e-003**	**0.0000**	**6.1515**

3.6 Paving - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.1000e-004	3.3000e-004	3.0700e-003	1.0000e-005	5.9000e-004	0.0000	5.9000e-004	1.6000e-004	0.0000	1.6000e-004	0.0000	0.5102	0.5102	3.0000e-005	0.0000	0.5107
Total	**2.1000e-004**	**3.3000e-004**	**3.0700e-003**	**1.0000e-005**	**5.9000e-004**	**0.0000**	**5.9000e-004**	**1.6000e-004**	**0.0000**	**1.6000e-004**	**0.0000**	**0.5102**	**0.5102**	**3.0000e-005**	**0.0000**	**0.5107**

3.7 Architectural Coating - 2017

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5381					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6600e-003	0.0109	9.3400e-003	1.0000e-005		8.7000e-004	8.7000e-004		8.7000e-004	8.7000e-004	0.0000	1.2766	1.2766	1.3000e-004	0.0000	1.2795
Total	**0.5398**	**0.0109**	**9.3400e-003**	**1.0000e-005**		**8.7000e-004**	**8.7000e-004**		**8.7000e-004**	**8.7000e-004**	**0.0000**	**1.2766**	**1.2766**	**1.3000e-004**	**0.0000**	**1.2795**

3.7 Architectural Coating - 2017

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.3000e-004	2.0000e-004	1.8900e-003	0.0000	3.6000e-004	0.0000	3.6000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3140	0.3140	2.0000e-005	0.0000	0.3143
Total	**1.3000e-004**	**2.0000e-004**	**1.8900e-003**	**0.0000**	**3.6000e-004**	**0.0000**	**3.6000e-004**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**0.3140**	**0.3140**	**2.0000e-005**	**0.0000**	**0.3143**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.5381					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6600e-003	0.0109	9.3400e-003	1.0000e-005		8.7000e-004	8.7000e-004		8.7000e-004	8.7000e-004	0.0000	1.2766	1.2766	1.3000e-004	0.0000	1.2795
Total	**0.5398**	**0.0109**	**9.3400e-003**	**1.0000e-005**		**8.7000e-004**	**8.7000e-004**		**8.7000e-004**	**8.7000e-004**	**0.0000**	**1.2766**	**1.2766**	**1.3000e-004**	**0.0000**	**1.2795**

3.7 Architectural Coating - 2017

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.3000e-004	2.0000e-004	1.8900e-003	0.0000	3.6000e-004	0.0000	3.6000e-004	1.0000e-004	0.0000	1.0000e-004	0.0000	0.3140	0.3140	2.0000e-005	0.0000	0.3143
Total	**1.3000e-004**	**2.0000e-004**	**1.8900e-003**	**0.0000**	**3.6000e-004**	**0.0000**	**3.6000e-004**	**1.0000e-004**	**0.0000**	**1.0000e-004**	**0.0000**	**0.3140**	**0.3140**	**2.0000e-005**	**0.0000**	**0.3143**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.2264	0.4635	2.3894	5.6500e-003	0.4277	6.5200e-003	0.4342	0.1147	6.0100e-003	0.1207	0.0000	417.5755	417.5755	0.0174	0.0000	417.9398
Unmitigated	0.2264	0.4635	2.3894	5.6500e-003	0.4277	6.5200e-003	0.4342	0.1147	6.0100e-003	0.1207	0.0000	417.5755	417.5755	0.0174	0.0000	417.9398

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
High School	595.20	59.52	59.52	1,157,616	1,157,616
Parking Lot	0.00	0.00	0.00		
Total	595.20	59.52	59.52	1,157,616	1,157,616

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
High School	9.50	7.30	7.30	77.80	17.20	5.00	75	19	6
Parking Lot	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0

LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
0.579415	0.062669	0.176431	0.113724	0.029579	0.004153	0.015740	0.004138	0.002638	0.003681	0.006622	0.000227	0.000983

5.0 Energy Detail

4.4 Fleet Mix

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	77.3274	77.3274	3.5000e-003	7.2000e-004	77.6251
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	77.3274	77.3274	3.5000e-003	7.2000e-004	77.6251
NaturalGas Mitigated	4.1900e-003	0.0381	0.0320	2.3000e-004		2.8900e-003	2.8900e-003		2.8900e-003	2.8900e-003	0.0000	41.4237	41.4237	7.9000e-004	7.6000e-004	41.6758
NaturalGas Unmitigated	4.1900e-003	0.0381	0.0320	2.3000e-004		2.8900e-003	2.8900e-003		2.8900e-003	2.8900e-003	0.0000	41.4237	41.4237	7.9000e-004	7.6000e-004	41.6758

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High School	776250	4.1900e-003	0.0381	0.0320	2.3000e-004		2.8900e-003	2.8900e-003		2.8900e-003	2.8900e-003	0.0000	41.4237	41.4237	7.9000e-004	7.6000e-004	41.6758
Total		**4.1900e-003**	**0.0381**	**0.0320**	**2.3000e-004**		**2.8900e-003**	**2.8900e-003**		**2.8900e-003**	**2.8900e-003**	**0.0000**	**41.4237**	**41.4237**	**7.9000e-004**	**7.6000e-004**	**41.6758**

5.2 Energy by Land Use - NaturalGas

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Parking Lot	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
High School	776250	4.1900e-003	0.0381	0.0320	2.3000e-004		2.8900e-003	2.8900e-003		2.8900e-003	2.8900e-003	0.0000	41.4237	41.4237	7.9000e-004	7.6000e-004	41.6758
Total		**4.1900e-003**	**0.0381**	**0.0320**	**2.3000e-004**		**2.8900e-003**	**2.8900e-003**		**2.8900e-003**	**2.8900e-003**	**0.0000**	**41.4237**	**41.4237**	**7.9000e-004**	**7.6000e-004**	**41.6758**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
High School	223650	65.0624	2.9400e-003	6.1000e-004	65.3128
Parking Lot	42160.8	12.2651	5.5000e-004	1.1000e-004	12.3123
Total		**77.3274**	**3.4900e-003**	**7.2000e-004**	**77.6251**

5.3 Energy by Land Use - Electricity

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
High School	223650	65.0624	2.9400e-003	6.1000e-004	65.3128
Parking Lot	42160.8	12.2651	5.5000e-004	1.1000e-004	12.3123
Total		**77.3274**	**3.4900e-003**	**7.2000e-004**	**77.6251**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.3872	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6600e-003	1.6600e-003	0.0000	0.0000	1.7600e-003
Unmitigated	0.3872	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6600e-003	1.6600e-003	0.0000	0.0000	1.7600e-003

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0242					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.3629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.0000e-005	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6600e-003	1.6600e-003	0.0000	0.0000	1.7600e-003
Total	**0.3872**	**1.0000e-005**	**8.7000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.6600e-003**	**1.6600e-003**	**0.0000**	**0.0000**	**1.7600e-003**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0242					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.3629					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	8.0000e-005	1.0000e-005	8.7000e-004	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	1.6600e-003	1.6600e-003	0.0000	0.0000	1.7600e-003
Total	**0.3872**	**1.0000e-005**	**8.7000e-004**	**0.0000**		**0.0000**	**0.0000**		**0.0000**	**0.0000**	**0.0000**	**1.6600e-003**	**1.6600e-003**	**0.0000**	**0.0000**	**1.7600e-003**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	6.7383	0.0490	1.2100e-003	8.1405
Unmitigated	6.7383	0.0490	1.2100e-003	8.1412

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
High School	1.49421 / 3.84225	6.7383	0.0490	1.2100e-003	8.1412
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**6.7383**	**0.0490**	**1.2100e-003**	**8.1412**

7.2 Water by Land Use

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
High School	1.49421 / 3.84225	6.7383	0.0490	1.2100e-003	8.1405
Parking Lot	0 / 0	0.0000	0.0000	0.0000	0.0000
Total		**6.7383**	**0.0490**	**1.2100e-003**	**8.1405**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	11.8750	0.7018	0.0000	26.6126
Unmitigated	11.8750	0.7018	0.0000	26.6126

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
High School	58.5	11.8750	0.7018	0.0000	26.6126
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		**11.8750**	**0.7018**	**0.0000**	**26.6126**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
High School	58.5	11.8750	0.7018	0.0000	26.6126
Parking Lot	0	0.0000	0.0000	0.0000	0.0000
Total		**11.8750**	**0.7018**	**0.0000**	**26.6126**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Vegetation