CEQA FINDINGS

Facts, Findings, and Statement of Overriding Considerations Related to San Rafael City Schools' San Rafael High School Master Facilities Long-Range Plan and Stadium Project Environmental Impact Report in Compliance with the California Environmental Quality Act (CEQA)

(SCH # 2016082017)

Proposed Adoption: March 27, 2017

TABLE OF CONTENTS

San Rafael City Schools

FACTS, FINDINGS, AND STATEMENT OF OVERRIDING CONSIDERATIONS
REGARDING ENVIRONMENTAL IMPACTS FROM THE
SAN RAFAEL HIGH SCHOOL MASTER FACILITIES LONG-RANGE PLAN
AND STADIUM PROJECT
City of San Rafael, County of San Mateo
(SCH # 2016082017)

A. INTRODUCTION.

The San Rafael City Schools Board of Trustees ("Board"), in certifying the Final Environmental Impact Report for the San Rafael High School Master Facilities Long-Range Plan and Stadium Project ("Project"), makes the Findings described below and adopts the Statement of Overriding Considerations presented at the end of the Findings. These Findings are based on the entire record before this Board, including: the August 5, 2016, Notice of Preparation ("NOP"), the December 2016 Draft Environmental Impact Report and Appendices ("Draft EIR"), and the March 2017 Final Environmental Impact Report and Appendices ("Final EIR"). These documents are collectively referred to herein as the "EIR", and are incorporated herein by reference. The EIR was prepared by the San Rafael City Schools ("District") acting as lead agency under the California Environmental Quality Act ("CEQA") to address the potential environmental effects of the Project and associated actions.

B. PROJECT SUMMARY.

The District proposes building demolitions, renovations, and new construction for the 29.8-acre San Rafael High School ("SRHS") campus that would result in the addition of 48,222 gross square feet (gsf) of building square footage on the campus. About 84,015 gsf in 12 buildings (including bleachers and concession stands) would be removed and 132,237 gsf in 10 new buildings would be added to the site. Additionally, three buildings would be modernized. At completion, about 327,892 gross square feet of building area would be provided on the campus in buildings that would be one, two, or three stories in height. Madrone High Continuation School would continue to operate at the SRHS campus, but would be relocated to proposed Building 1. Total on-campus enrollment would increase by about 200 students. No new staff or faculty increases are projected.

The EIR addresses the proposed overall program improvements of the SRHS Master Facilities Long-Range Plan at a programmatic level of detail in accordance with CEQA Guidelines section 15168 because specific details and designs for many of the proposed improvements have not yet been completed. However, the EIR addresses one of the Long-Range Plan elements—the Stadium Project—at a project level of detail in accordance with CEQA Guidelines section 15161.

B.1. Project Objectives and Benefits.

The SRHS campus is the oldest campus in the District, with the original buildings built in 1939. This campus has seen several modernizations and expansions over the years, with buildings dating from 1957, 1958, 1964, and 1965. The most recent modernization program in 2004 included renovations for music and physical education and minor upgrades to the science wing. The SRHS campus is severely overcrowded in its current condition, with the recent addition of portable buildings and projected enrollment increases of nearly 200

students. Many of the older buildings are in good shape in terms of infrastructure, but others are in severe disrepair and need to be upgraded or replaced. The campus is complicated by the shared use of the site with Madrone High Continuation School. New buildings would allow the campus to provide expanded programs and modernized facilities for the students, and provide permanent classrooms for those students currently housed in temporary buildings.

As with many District schools, to accommodate additional capacity, expansion must occur vertically to maintain important outdoor space. For this reason, three buildings (Science, CTE, and Kitchen Cafeteria/Madrone) with infrastructure and operational issues are proposed for replacement, many with two-story buildings that incorporate additional classrooms. The administration area, currently housed in the theater building, is inefficient, undersized, and difficult to find and is therefore proposed to be moved to a new building. Finally, a stadium upgrade is included, to improve the overall usage of this facility.

Madrone High Continuation School currently shares the campus with SRHS, although it is fully contained within its own building. The building was modernized in 2004 and is in relatively good shape; however, administrative functions are separated and present a security issue. In addition, there is no dedicated outdoor space for Madrone students, which poses operational difficulties and complex coordination with SRHS. A replacement of the current building (Building 1) is incorporated into the SRHS Master Facilities Long-Range Plan to house Madrone students.

The objectives specific to the work include the following:

1. Provide functional instructional and administrative space to meet program requirements;
2. Provide upgrades to the existing SRHS campus to serve the population in this area;
3. Improve campus facilities to accommodate a total campus population of approximately 1,325 students at completion of the SRHS Master Facilities Long-Range Plan program improvements;
4. Modernize classrooms, laboratories, and libraries to meet contemporary standards of education to ensure all students are well prepared for success in the 21st century;
5. Implement modern computer technology for the campus;
6. Replace outmoded teaching equipment;
7. Create new space for administration staff that is closer to school entrance;
8. Upgrade buildings for fire safety, energy conservation, seismic safety, ADA compliance, and campus security;
9. Provide an upgraded sports stadium, track and field to improve SRHS's physical education and athletic program for its students and other students in the District that utilize the stadium and field;
10. Address increasing enrollment while providing students and faculty with a learning environment that reflects the District's strategic plan for the future;
11. Meet the intent of the Master Facilities Plan that was approved by the District's Board on July 27, 2015, and phase projects under the SRHS Master Facilities Long-Range Plan;
12. Improve disabled access;

13. Implement "green building" practices in all capital improvement projects;
14. Provide permanent classrooms for students currently located in temporary buildings; and
15. For the Stadium Project, provide an enhanced learning environment for both physical education and after-school sports activities.

B.2. Project Description.

The proposed building demolitions, renovations, and new construction for the 29.8-acre SRHS campus would result in the addition of 48,222 gsf of building square footage on the campus. About 84,015 gsf in 12 buildings (including bleachers and concession stands) would be removed and 132,237 gsf in 10 new buildings would be added to the site. Additionally, three buildings would be modernized. At completion, about 327,892 gsf of building area would be provided on the campus in buildings that would be one, two, or three stories in height. The overall project would result in a net gain of 15 new parking spaces.

Master Facilities Long-Range Plan

Specific details and designs for many of the proposed improvements of the SRHS Master Facilities Long-Range Plan have not yet been completed. Therefore, the EIR addresses them at a programmatic level of detail in accordance with CEQA Guidelines section 15168.

New Construction

Proposed new construction at the SRHS campus under the SRHS Master Facilities Long-Range Plan includes Building No. 1 (Science, to also house Madrone High Continuation School on first floor), Building No. 2 (Administration/Kitchen/Student Commons/ Classrooms), Building No. 3 (Career and Technical Education [CTE]/Art), Building No. 4 (Classrooms/Ceramics/Theater), Building No. 7 (Wrestling/Dance/Classrooms), and Building No. 8 (Restroom/Changing Rooms).

In addition, the Master Facilities Long-Range Plan program improvements would include overall site improvements such as new landscaping, new pathways (with improvements for compliance with ADA), minor changes to site layout, reconfiguration of parking lots, new utility lines and improvements (water, wastewater, gas, electricity, telecommunications, and storm drainage), new bicycle parking facilities, and new lighting. The main areas proposed for landscape improvements would likely be the central campus quad. These areas would be leveled and landscaping would be added to enhance the area for gathering and outdoor learning. Additionally, bio-swales and other rainwater retention areas would be developed that would increase the amount of planting on the campus, generally near parking lots and driveways.

Renovations

Building A (Administration/Theater/Classrooms), Building D (Classroom/ Library), and Building K (Head Start) would be modernized without any demolition. No change in footprint would occur for these buildings, and changes would be internal.

Demolition

The main buildings proposed for demolition under the Master Facilities Long-Range Plan program improvements include Building F (Science), Building I (Madrone/Cafeteria),

Building L (Photography/Ceramics), Building M (Auto Tech/Wood Shop), Building O (Academy), Building P1 (Gymnasium, partial), Building R (Art), and Building W (Daycare Shed).

Use

Madrone High Continuation School would continue to operate at the SRHS campus, but would be relocated to proposed Building 1. At completion, total on-campus enrollment would increase by about 200 students to a total enrollment of about 1,325 students. No new staff or faculty increases are projected.

Stadium Project

The EIR addresses one of the Long-Range Plan elements—the Stadium Project—at a project level of detail in accordance with CEQA Guidelines section 15161. The proposed Stadium Project (also referred to as Miller Field) is located in a central portion of the SRHS campus, south of the existing gymnasium, and east of the Library and Classrooms building.

New Construction

Proposed new construction at the SRHS Campus under the Stadium Project includes the following new buildings: proposed Building 5 (Concessions), Building 6 (Restrooms/ Changing Rooms), Building 9 (Visitor & Home Bleachers), Building 10 (Restrooms), Stadium ticket booth and press box, Christmas tree sales lot concession, ASB concession building, and various storage buildings. Additionally, a proposed new parking lot for up to 39 cars and team bus parking at the south end of the field (just north of 3rd Street) with a new driveway at this location.

The proposed Stadium Project would also include overall site improvements, such as new landscaping, fencing, storage, site furnishings, new pathways, storm drain improvements, and new utilities, including a new 2-inch water line, new 4-inch wastewater lines to serve the restrooms, concessions, and changing rooms, new storm drain, and new data lines. Additionally, eight new bicycle racks would be installed, accommodating 16 bicycles.

New Construction/Renovations

New synthetic turf would replace the existing grass turf that now exists, thus extending the seasonal use of the field. The exact brand of material to be used has not been selected, however no "crumb rubber" materials would be present in the synthetic turf. Likewise, a new nine-lane 400-meter all-weather track in a broken-back layout would replace the existing eight-lane track/nine-lane straight-away.

Other proposed improvements would include replacement of utilities (such as new electrical connections to replace existing electrical lines), replacement of existing lighting with energy-efficient lighting (stadium lighting and other security lighting), a new plaza, and new furnishings, including a new scoreboard to replace the existing scoreboard and a new public address system to replace the existing system to direct sound to the bleachers and the field.

Demolition

The following buildings are proposed for demolition as part of the proposed Stadium Project: Building V (Bleachers), Building X (Press Box), Building Y (Concession Stand), and Building

Z (Ticket Booth). The existing track and field, fences, site furnishings, stadium lighting, and storage containers would also be demolished to allow for their replacement.

Use

The number of annual Stadium events is expected to increase by 84 events with the new Stadium Project, however the 84 new events at the stadium would not be all new to the SRHS campus. One new sport use of the proposed Stadium Project in the winter season would be the SRHS women's lacrosse team. Primarily due to this new lacrosse usage, the total number of participants using the proposed Stadium is expected to increase by about 48 participants per day of use for practice, and by about 96 participants per day of use for games, during the (approximately) February to May season. It is expected that the number of spectators at the proposed Stadium would increase by about 12 spectators per day of use for practice, and by about 100 spectators per day of use for games. The other new events at the proposed Stadium would be: (1) the women's and men's soccer league finals, which would occur once each year for one Saturday; (2) four new track and field events and league and North Coast Section Redwood Empire meets once every three years; and (3) the women's and men's lacrosse league finals, which would occur every three years for one or two days. Community use is expected to continue in the same manner with the proposed stadium improvements.

B.3. Site Location and Surrounding Land Uses.

The project site, the 29.8-acre SRHS campus, is located in central Marin County in the incorporated City of San Rafael, California. Historically, SRHS has been at this location since 1924. Madrone High Continuation School has been located on the campus since 1986. The campus is set within the overall developed portion of San Rafael east of U.S. Highway 101, and is surrounded by a mixture of residential and commercial development. Specifically, single-family residential development within San Rafael is immediately east of the campus, and a mixture of single-family and multi-family residential development is located immediately north of the campus. To the west, the San Rafael City Schools Maintenance Facility (38 Union Street) abuts the campus. The immediate environs to the west of the campus also include the City of San Rafael's Fire Station No. 52, Whole Foods Market, senior housing, and a Salvation Army thrift store. Mission Street abuts the campus to the north, Embarcadero Way abuts the campus to the southeast, and Third Street abuts the campus to the south. A variety of commercial development is located to the south of the campus across Third Street, including the Montecito Plaza shopping center, 3rd Street Plaza offices and retail, and a boat yard. San Rafael Creek is located south of the campus, on the south side of 3rd Street

Of the total campus acreage, about 15.87 acres are developed for the athletic outdoor area, while the remaining 13.93 acres are used for campus buildings and landscaped areas. No natural features such as creeks or other waterways are located on the SRHS campus. Most of the SRHS campus, including all currently developed areas, is relatively level, with an elevation of approximately 10 feet above mean sea level (msl). However, relatively steep slopes are present near the eastern boundary of the campus, with elevations reaching 74 feet above msl near the intersection of Mission Avenue and Embarcadero Way. Mission Avenue and Embarcadero Way slope down from east to west from this high point. Slopes are present near the northeastern site boundary from the SRHS tennis courts to Embarcadero Way, and near the southeastern site boundary from Mission Avenue to the southeast corner of the stadium.

The main access to the 29.8-acre campus is provided via 3rd Street and Mission Avenue. Other roads abutting the campus include Belle Avenue, Park Street, and Embarcadero Way. Major highway access to the project site is available from State Highway 101, about ¼ mile west of the campus. Mission Avenue and 2nd Street are main exit points from this highway for drivers coming from the north and south.

C. ENVIRONMENTAL REVIEW & PUBLIC PARTICIPATION.

The District conducted an extensive environmental review for the Project that included a preliminary review, a Draft EIR, a Final EIR, appendices, referenced reports and documents, along with public review and comment periods. The implementation of the EIR scoping and review process is described in the Draft EIR and Final EIR. The following is a summary of the District's environmental review for this Project:

- *The Notice of Preparation, stating that an EIR would be prepared, was circulated for public review from August 5, 2016, to September 6, 2016.*

- *The Draft EIR was distributed for a 45-day State Clearinghouse review and comment period and public review and comment period on December 15, 2016, and ending on January 30, 2017.*

- *The District prepared a Final EIR, which included the District's responses to comments received during the review and comment period. These responses were made available in a manner prescribed by CEQA and the CEQA Guidelines and per agreement with the reviewing public agencies.*

A scoping meeting was also held on September 13, 2016, which included a brief overview of the EIR process and allowed time for public comment.

C.1. Custodian and Location of the Record.

Findings:

The documents and other materials which constitute the record of proceedings for the District Board of Trustees' findings and approval of this Project are located at the San Rafael City Schools District Office, 310 Nova Albion Way, San Rafael, CA 94903. The District is the custodian of all documents in the record.

C.2. Independent Judgment.

A decision was made to retain Amy Skewes-Cox, AICP, to prepare the documents. The EIR was prepared under the supervision and direction of Dr. Dan Zaich, Director of Strategic Initiatives, San Rafael City Schools.

Findings:

Based on a review of the entire record, the Board finds that the EIR reflect the independent judgment of the Board and the District. The District has exercised independent judgment in accordance with CEQA Section 21082.1(c)(3) in retaining its own environmental consultant, directing the consultant in preparing the EIR, and reviewing, analyzing, and revising material prepared by the consultant.

D. ENVIRONMENTAL IMPACTS.

The EIR, written testimony, these facts and findings, statement of overriding considerations, and other information in the administrative record serve as the basis for the District's environmental determination. The detailed analyses of potential environmental impacts and proposed mitigation measures for the Project are presented in Chapter 4 of the Draft EIR. Written comments and the District's responses are provided in Chapter 2 of the Final EIR.

Presented below are the environmental findings made on behalf of this Board after its review of the documents referenced above, as well as the written comments and responses thereto on the Project presented to the Board prior to the Board meeting of March 27, 2017. Factual discussion in this document summarizes the information contained in the Draft and Final EIR and the administrative record upon which this Board bases its decision to approve the Project.

The Draft EIR evaluated fifteen (15) major environmental categories that had potential significant adverse impacts. Both project specific and cumulative impacts were evaluated and some of the categories contained several sub-issues, which are summarized below. Of these fifteen (15) major environmental categories, the Board concurs with the conclusions in the EIR that the impacts in fourteen (14) of these categories are or can be mitigated below a significant impact threshold. With respect to the traffic category, the Board concurs with the conclusions in the EIR that certain traffic impacts are or can be mitigated below a significant impact threshold as well. For the remaining areas of traffic impacts that cannot be mitigated below a level that is less than significant, overriding considerations exist which make these impacts acceptable.

D.1. Findings on Insignificant Impacts.

<u>The EIR found the following impacts to be less than significant for the Master Facilities Long Range Plan:</u>

- *Operation of the Master Facilities Long-Range Plan would not conflict with or obstruct implementation of the 2010 Clean Air Plan (CAP).*
- *Operation of the Master Facilities Long-Range Plan would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; or result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.*
- *Operation of the Master Facilities Long-Range Plan would not expose sensitive to substantial pollutant concentrations.*
- *The Master Facilities Long-Range Plan would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*
- *The Master Facilities Long-Range Plan would generally conform with local policies and ordinances protecting biological resources, and no major conflicts are anticipated.*
- *The Master Facilities Long-Range Plan would not expose people or structures to substantial adverse effects involving rupture of a known earthquake fault.*
- *The Master Facilities Long-Range Plan would not expose people or structures to substantial adverse effects involving landslides.*

- *The Master Facilities Long-Range Plan would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.*
- *The Master Facilities Long-Range Plan would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*
- *Development in accordance with the Master Facilities Long-Range Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*
- *Development in accordance with the Master Facilities Long-Range Plan would not create a significant hazard to the public or the environment as a result of being located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.*
- *Development in accordance with the Master Facilities Long-Range Plan would not violate any water quality standards or waste discharge requirements or otherwise degrade water quality.*
- *Development in accordance with the Master Facilities Long-Range Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.*
- *Development in accordance with the Master Facilities Long-Range Plan would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*
- *Development in accordance with the Master Facilities Long-Range Plan would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.*
- *Development in accordance with the Master Facilities Long-Range Plan would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; or inundation by seiche, tsunami, or mudflow.*
- *Development in accordance with the Master Facilities Long-Range Plan would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plans, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.*
- *The Master Facilities Long-Range Plan would not result in any noise impacts from airports or private airstrips.*
- *Development in accordance with the Master Facilities Long-Range Plan would increase the demand for fire protection services, but not to the extent that new or physically altered fire stations would be needed.*
- *Development in accordance with the Master Facilities Long-Range Plan would increase the demand for police services, but not to the extent that new or physically altered police stations would be needed.*

- *Development associated with the Master Facilities Long-Range Plan would not conflict with the Transportation Authority of Marin's Congestion Management Plan (CMP), including but not limited to level of service standards and travel demand measures, or other standards established by the Transportation Authority of Marin for designated roads or highways.*
- *Implementation of the Master Facilities Long-Range Plan would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks.*
- *The Master Facilities Long-Range Plan does not propose any features that would result in inadequate emergency access.*
- *The Master Facilities Long-Range Plan would not conflict with any adopted policies, plans, or programs regarding public transit facilities, and would not otherwise decrease the performance or safety of these facilities.*
- *Development in accordance with the Master Facilities Long-Range Plan would not require or result in the construction of new water facilities or expansion of existing facilities that would have significant environmental effects.*
- *Water supplies would be sufficient to serve Master Facilities Long-Range Plan development, and new or expanded water entitlements would not be necessary.*
- *Development in accordance with the Master Facilities Long-Range Plan would not require or result in the construction of new wastewater facilities or expansion of existing facilities that would have significant environmental effects.*
- *Development in accordance with the Master Facilities Long-Range Plan would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in a determination by the wastewater treatment provider that serves the project site that it has inadequate capacity to serve the Long-Range Plan's projected demand in addition to the provider's existing commitments.*
- *The landfill serving the campus would have sufficient capacity to accommodate the solid waste disposal needs of Master Facilities Long-Range Plan development.*
- *Master Facilities Long-Range Plan development would comply with federal, state, and local statutes and regulations related to solid waste.*
- *Development in accordance with the Master Facilities Long-Range Plan would not result in a substantial increase in overall per capita energy consumption or in the wasteful, inefficient, or unnecessary consumption of energy.*
- *Development in accordance with the Master Facilities Long-Range Plan would not require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity.*
- *Development in accordance with the Master Facilities Long-Range Plan would not conflict with applicable energy efficiency policies or standards.*
- *Development in accordance with the Master Facilities Long-Range Plan would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or such that new or altered facilities would be needed.*

<u>The EIR found the following impacts to be less than significant for the Stadium Project:</u>

- *The new Stadium Project would not have the potential to substantially degrade the existing visual character or quality of the site and its surroundings.*

- *Operation of the Stadium Project would not conflict with or obstruct implementation of the 2010 Clean Air Plan (CAP).*
- *Construction and operation of the Stadium Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation; or result in a cumulatively considerable net increase of any criteria pollutant (including ozone precursors) for which the project region is non-attainment under an applicable federal or state ambient air quality standard.*
- *Operation of the Stadium Project would not expose sensitive to substantial pollutant concentrations.*
- *The Stadium Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.*
- *The Stadium Project would generally conform with local policies and ordinances protecting biological resources, and no major conflicts are anticipated.*
- *The Stadium Project would not cause a substantial adverse change in the significance of a built-environment historical resource as defined in CEQA Guidelines Section 15064.5.*
- *The Stadium Project would not expose people or structures to substantial adverse effects involving rupture of a known earthquake fault.*
- *The Stadium Project would not expose people or structures to substantial adverse effects involving landslides.*
- *The Stadium Project would not expose people or structures to substantial adverse effects involving expansive and corrosive soils.*
- *The Stadium Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.*
- *The Stadium Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.*
- *The Stadium Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.*
- *The Stadium Project would not be located on a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and, as a result, would not create a significant hazard to the public or the environment.*
- *The Stadium Project would not violate any water quality standards or waste discharge requirements or otherwise degrade water quality.*
- *The Stadium Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.*
- *The Stadium Project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, or create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.*

- *The Stadium Project would not place within a 100-year flood hazard area structures which would impede or redirect flood flows.*
- *The Stadium Project would not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding of as a result of the failure of a levee or dam; or inundation by seiche, tsunami, or mudflow.*
- *The Stadium Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to, the General Plan, specific plans, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.*
- *The proposed Stadium Project would not result in any noise impacts from airports or private airstrips.*
- *The proposed Stadium Project would not result in any permanent noise increases.*
- *The Stadium Project would increase the demand for fire protection services, but not to the extent that new or physically altered fire stations would be needed.*
- *The Stadium Project would increase the demand for police services, but not to the extent that new or physically altered police stations would be needed.*
- *Provision of the Stadium Project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation, including mass transit and nonmotorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit.*
- *Development of the Stadium Project would not conflict with the Transportation Authority of Marin's Congestion Management Program, including but not limited to level of service standards and travel demand measures, or other standards established by the Transportation Authority of Marin for designated roads or highways.*
- *Implementation of the Stadium Project would not result in a change in air traffic patterns, including either an increase in traffic or a change in location that results in substantial safety risks.*
- *None of the features of the Stadium Project would result in inadequate emergency access.*
- *The Stadium Project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, and would not otherwise decrease the performance or safety of these facilities.*
- *The Stadium Project would not require or result in the construction of new water facilities or expansion of existing facilities that would have significant environmental effects.*
- *Water supplies would be sufficient to serve The Stadium Project development, and new or expanded water entitlements would not be necessary.*
- *The Stadium Project would not require or result in the construction of new wastewater facilities or expansion of existing facilities that would have significant environmental effects.*
- *The Stadium Project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in a determination by the*

wastewater treatment provider that serves the project site that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.

- *The landfill serving the campus would have sufficient capacity to accommodate the solid waste disposal needs of the Stadium Project.*
- *The Stadium Project would comply with federal, state, and local statutes and regulations related to solid waste.*
- *The Stadium Project would not result in a substantial increase in overall per capita energy consumption or in the wasteful, inefficient, or unnecessary consumption of energy.*
- *The Stadium Project would not require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity.*
- *The Stadium Project would not conflict with applicable energy efficiency policies or standards.*
- *The Stadium Project would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or such that new or altered facilities would be needed.*

<u>The EIR found the following significance criteria would not apply to the Master Facilities Long Range Plan or the Stadium Project proposed under the Long-Range Plan, and therefore excluded the following criteria from further discussion in the EIR:</u>

- *Have a Substantial Adverse Effect on Any Riparian Habitat or Other Sensitive Natural Community Types*: Riparian habitats and sensitive natural community types are absent from the project site.

- *Have a Substantial Adverse Effect on Regulated Waters:* Regulated waters are absent from the project site.

- *Conflict with Habitat Conservation Plans:* No such plans encompassing the site or vicinity have been adopted.

- *Result in Substantial Soil Erosion or the Loss of Topsoil.* Potential soil erosion impacts of the Master Facilities Long-Range Plan, including the Stadium Project, would be related to stormwater runoff entraining soils exposed during construction, and are analyzed in Section 4.8, Hydrology and Water Quality, of the EIR.

- *Have Soils Incapable of Adequately Supporting the Use of Septic Tanks or Alternative Wastewater Disposal Systems in Areas Where Sewers are not Available for the Disposal of Wastewater.* As the SRHS campus is served by the San Rafael Sanitation District and no septic tanks or alternative wastewater disposal systems are proposed, the Master Facilities Long-Range Plan, including the Stadium Project, would have no impacts associated with septic tanks or alternative wastewater disposal systems, and this significance criterion is not discussed further in this impact analysis.

- *Emit Hazardous Emissions or Handle Hazardous or Acutely Hazardous Materials, Substances or Waste within ¼ Mile of an Existing or Proposed School.* Public Resources Code Section 21151.4 requires consultation with the local school district if

a proposed project would be reasonably anticipated to emit hazardous air emissions or handle extremely hazardous substances within ¼ mile of a school. The Master Facilities Long-Range Plan does not include any components that would result in significant hazardous emissions or handle significant quantities hazardous or acutely hazardous materials, substances, or waste, and therefore this impact would be less than significant.

- *Impair Implementation of, or Physically Interfere With, an Adopted Emergency Response Plan or Emergency Evacuation Plan.* The Master Facilities Long-Range Plan includes development within the existing SRHS campus, and no components would restrict external vehicular or pedestrian traffic. Vehicular access within the SRHS campus would be improved through the addition of a new driveway access point on 3rd Street. Therefore, there would be no potential impairment or interference with emergency response or evacuation plans.

- *Result in an Aviation Safety Hazard Related to a Public Airport, Private Use Airport, or Private Airstrip.* San Rafael Airport is located approximately 3 miles to the north of the SRHS campus and a private heliport is located approximately 2 miles to the southeast. The SRHS campus is not located within an airport use plan, or near a public airport, public use airport, or private airstrip, and thus would not result in a safety hazard for people residing or working in the project area.

- *Expose People or Structures to Wildland Fire Hazards.* The SRHS campus is not located in a wildland hazard area.

- *Substantially Deplete Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such that There Would Be a Net Deficit in Aquifer Volume or a Lowering of the Local Groundwater Table Level.* No significant groundwater resources are located at the project site. None of the Master Facilities Long-Range Plan development would use groundwater or significantly interfere with groundwater discharge.

- *Place Housing within a 100-Year Flood Hazard Area as Mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or Other Flood Hazard Delineation Map.* No housing is proposed by the Master Facilities Long-Range Plan.

- *Physically divide an established community.* The SRHS campus is an existing campus set within a residential and commercial area of the City of San Rafael. The proposed changes to the campus would not result in the physical division of an established community. The campus would remain a high school campus and facilities would be upgraded and replaced.

- *Conflict with any applicable habitat conservation plan or natural community conservation plan.* No habitat conservation plan or natural community conservation plan applies to the SRHS campus. Impacts on biological resources are addressed in Section 4.3, Biological Resources, of the EIR.

Findings:

The EIR's discussion and analysis is incorporated herein. Based on the whole record, the Board hereby finds that the foregoing impacts are less than significant. (LTS)

D.2. Findings Regarding Impacts Analyzed in the EIR and Determined to be Mitigated to Less than Significant.

This section includes findings for Project impacts which are potentially significant, but can be mitigated to a less than significant level with the implementation of mitigation measures. This Board finds that all potentially significant impacts of this project listed below can and will be mitigated, reduced or avoided by implementation of mitigation measures. Specific findings of this Board for each category of such impacts are set forth below in this section.

CEQA Section 21081 states that no public agency shall approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant effects unless the public agency makes one or more of the following findings:

a. *Changes or alterations have been required in or will be incorporated into the project, which will mitigate or avoid the significant environmental effects thereof as identified in the completed environmental impact report.*

b. *Such changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such agency or can and should be adopted by such other agency*

c. *Specific economic, social, legal, technological or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report.*

This Board hereby finds, pursuant to CEQA Section 21081, that the following potential environmental impacts can and will be mitigated to below a level of significance, based upon the implementation of the mitigation measures recommended in the EIR. The EIR's discussion and analysis is incorporated herein and in each and every finding below.

Each proposed mitigation measure discussed in this section of the findings is assigned a title correlating it with the environmental category used in the Mitigation Monitoring and Reporting Program included in Chapter 4 of the Final EIR.

The following abbreviations are used throughout these Findings: LTS – less than significant; PS – potentially significant; and SU – significant and unavoidable.

<u>Impact AESTHETICS-1</u>: Development in accordance with the Master Facilities Long-Range Plan could substantially degrade the existing visual character or quality of the site and its surroundings if new buildings do not respect the overall design of the campus and surrounding residences, or include adequate landscaping. (PS)

<u>Mitigation Measures</u>:
<u>AESTHETICS-1a</u>: New buildings shall be designed to be both contemporary in appearance and compatible with the materiality, features, size, scale, and proportion, and massing of the existing historic building (Building A) on campus. The new work shall be differentiated from the old and shall not create a false sense of historical development.

<u>AESTHETICS-1b</u>: Building heights shall be less than 36 feet to be within the limits established by the City of San Rafael for the Public/Quasi-Public zoning district and to respect the scale of nearby residences.

AESTHETICS-1c: New buildings shall be designed in a color scheme that is compatible with the neutral and earth-tone colors of existing buildings, with accent colors used for specific detailing.

AESTHETICS-1d: The District shall establish Project Site Design Committees for the new buildings on the campus prior to development of schematic designs for new buildings (except for the Stadium Project, which has already undergone schematic design), and shall ensure that at least one public hearing is held for each project prior to development of construction drawings. The Project Site Design Committees shall include at least two representatives of the neighborhood.

AESTHETICS-1e: Large expanses of flat wall area along Mission Avenue shall be avoided in new buildings (especially Building 4, which has a long east/west axis), and windows and architectural detailing shall be added to provide a more aesthetically pleasing view of buildings as seen from Mission Avenue.

AESTHETICS-1f: A landscape plan shall be developed for the entire campus prior to construction of any new campus buildings in the campus core. This plan shall be reviewed by the District Board of Trustees at one public hearing that shall allow comments from the public. Suggestions from this hearing shall be considered prior to developing the final landscape plans that shall be developed prior to any construction within the campus core. The new landscape plan shall include groundcover and shrubbery at the north end of the site adjacent to Mission Avenue, where a narrow setback would exist between new buildings and the sidewalk area. New evergreen tree plantings shall occur along Mission Avenue to screen campus buildings from view, and to screen parking areas from view. Additional tree plantings with evergreen trees shall be included for the main existing parking area adjoining 3rd Street as well as for the new parking lot for 39 cars at the south end of the Stadium Project site. A minimum of five evergreen trees that are at least 24 feet at maturity shall be planted on the south side of this new parking area. All trees shall be planted from 24-inch boxes and shall be monitored for the first 3 years so that any lost trees can be replaced.

The combination of the above measures would reduce this impact to a less-than-significant level. (LTS)

Facts: The relevant facts are set forth in Chapter 4.1 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential aesthetic impacts on visual character or quality of the site and its surroundings have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce this impact on aesthetics to less than significant. (LTS)*

Impact AESTHETICS-2: Development in accordance with the Master Facilities Long-Range Plan could result in increased light and glare for the surrounding residential neighborhood due to lighting of facilities and outdoor areas. (PS)

Mitigation Measure:

AESTHETICS-2: All new lighting shall be shielded to reduce off-site light and glare. Pedestrian pathway lighting shall be of a uniform style and quality of illumination that aids in navigation without over-lighting the surroundings. Signage lighting shall be minimized to provide context for pedestrians and drivers. Parking lot lighting shall be shielded and cast downward to minimize "light spillage" to off-site locations and shall be placed on timers so that minimal lighting occurs after 11:00 PM. To the extent practicable, area lighting and security lighting shall be controlled by the use of timed switches and/or motion detector activation to reduce energy consumption and excess lighting. (LTS)

Facts: The relevant facts are set forth in Chapter 4.1 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential aesthetic impacts associated with increased lighting and glare that could be visible to nearby residences have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact and glare the increased lighting for security and functionality purposes may have to less-than-significant levels. (LTS)*

Impact AESTHETICS-3: Lighting for the Stadium Project could result in increased light and glare for the surrounding residential neighborhood. (PS)

Mitigation Measure:

AESTHETICS-3: The District shall install outdoor lighting that is light-emitting diode (LED) but that is no greater than 3,000 Kelvin and that minimizes the "blue-rich" lighting as a means of reducing glare in the community and protecting public health. All outdoor lighting shall be shielded and directed downwards to minimize "light spillage" to off-site locations. Lighting shall be on timers so that no lighting of the Stadium Project fields occurs after 11:00 PM. Pedestrian and security lighting shall be strategically placed in the Stadium Project vicinity so that excessive lighting does not occur and shall also be shielded and directed downward. When possible, motion activated lighting shall be used to minimize overall lighting of the Stadium Project area. (LTS)

Facts: The relevant facts are set forth in Chapter 4.1 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential aesthetic impacts associated with increased lighting and glare*

that could be visible to nearby residences have been adopted as stated in the approval resolution.

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact and glare impact to less-than-significant levels. (LTS)*

<u>Impact AIR-1</u>: Construction for the Master Facilities Long-Range Plan could violate an air quality standard or contribute substantially to an existing or projected air quality violation; or result in a cumulatively considerable net increase of a criteria pollutant (including ozone precursors) for which the project region is non-attainment under an applicable federal or state ambient air quality standard. (PS)

<u>Mitigation Measures</u>

<u>AIR-1a</u>: During project construction, the contractor shall implement a dust control program that includes the following measures:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- A publicly visible sign shall be posted with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Bay Area Air Quality Management District (BAAQMD) phone number shall also be visible to ensure compliance with applicable regulations.

The foregoing requirements shall be included in the appropriate contract documents with the contractor.

<u>AIR-1b</u>: Prior to construction of an individual project under the Master Facilities Long-Range Plan, a project-level analysis of criteria pollutant emissions during construction shall be prepared in accordance with BAAQMD CEQA Air Quality Guidance. If emissions exceed the BAAQMD's project-level thresholds of significance, then exhaust-control measures shall be identified to reduce emissions below the thresholds of significance. Acceptable exhaust-control measures for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, oxidation catalysts, diesel particulate filters, and/or other options as such become available. The contractor shall submit a Certification Statement to the San Rafael City Schools stating that the contractor agrees to comply fully with the identified exhaust-control measures (if any) and acknowledges that a significant violation of these measures shall constitute a material breach of contract. The

foregoing requirement shall be included in the appropriate contract documents with the contractor. (LTS)

Facts: The relevant facts are set forth in Chapter 4.2 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impacts on air quality during construction associated with a net increase of criteria pollutants have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact the construction period has on air quality to less-than-significant levels. (LTS)*

Impact AIR-2: Construction of the Master Facilities Long-Range Plan could expose sensitive receptors to substantial pollutant concentrations. (PS)

Mitigation Measure:

AIR-2: Prior to construction of an individual project under the Master Facilities Long-Range Plan, a project-level health risk analysis of DPM and $PM_{2.5}$ emissions during construction shall be prepared in accordance with BAAQMD and OEHHA guidance. If the health risks and hazards from DPM and $PM_{2.5}$ emissions exceed the BAAQMD's project-level thresholds of significance, then exhaust-control measures shall be identified to reduce emissions below the thresholds of significance. Acceptable exhaust-control measures for reducing DPM and $PM_{2.5}$ emissions include the use of late model engines, diesel particulate filters, and/or other options as such become available. The contractor shall submit a Certification Statement to the San Rafael City Schools stating that the contractor agrees to comply fully with the identified exhaust-control measures (if any) and acknowledges that a significant violation of these measure shall constitute a material breach of contract. The foregoing requirement shall be included in the appropriate contract documents with the contractor. (LTS)

Facts: The relevant facts are set forth in Chapter 4.2 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impacts on sensitive receptors associated with substantial pollutant concentration exposure during construction have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact the construction period has on air quality and sensitive receptors to less-than-significant levels. (LTS)*

Impact AIR-3: Construction of the Stadium Project could expose sensitive receptors to substantial pollutant concentrations. (PS)

Mitigation Measure:

AIR-3: During Stadium Project construction, the contractor shall use off-road equipment that meets the California Air Resources Board's Tier 2 (or higher) certification requirements. The contractor shall submit a Certification Statement to the San Rafael City Schools stating that the contractor agrees to comply fully with the Tier 2 (or higher) engine requirements described above and acknowledges that a significant violation of the measure shall constitute a material breach of contract. The foregoing requirements shall be included in the appropriate contract documents with the contractor. (LTS)

Facts: The relevant facts are set forth in Chapter 4.2 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impacts on sensitive receptors associated with substantial pollutant concentration exposure during construction have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact the construction period has on air quality and sensitive receptors to less-than-significant levels. (LTS)*

Impact BIO-1: Development under the Master Facilities Long-Range Plan may result in adverse impacts on nesting birds, if present on the site. (PS)

Mitigation Measure:

BIO-1: Adequate measures shall be taken to avoid inadvertent take of raptor nests and other nesting birds protected under the Migratory Bird Treaty Act when in active use. This shall be accomplished by taking the following steps:

- If construction is proposed during the nesting season (February through August), a focused survey for nesting raptors and other migratory birds shall be conducted by a qualified biologist within 14 days prior to the onset of vegetation removal or construction, in order to identify any active nests on the project site and in the vicinity of proposed construction.
- If no active nests are identified during the survey period, or if development is initiated during the non-breeding season (September through February), construction may proceed with no restrictions.
- If bird nests are found, an adequate setback shall be established around the nest location and construction activities restricted within this no-disturbance zone until the qualified biologist has confirmed that any young birds have fledged and are able to function outside the nest location. Required setback distances for the no-disturbance zone shall be based on input received from the California Department of Fish and Wildlife (CDFW), and may vary depending on species and sensitivity to

disturbance. As necessary, the no-disturbance zone shall be fenced with temporary orange construction fencing if construction is to be initiated on the remainder of the development site.

A report of findings shall be prepared by the qualified biologist and submitted to the District for review and approval prior to initiation of construction within the no-disturbance zone during the nesting season (February through August). The report either shall confirm absence of any active nests or shall confirm that any young within a designated no-disturbance zone have fledged and construction can proceed. (LTS)

Facts: The relevant facts are set forth in Chapter 4.3 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impacts the development under the Master Facilities Long Range Plan may have on bird nests have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact on bird nests associated with the Project to less-than-significant levels. (LTS)*

Impact BIO-2: Implementation of the Stadium Project could result in adverse impacts on nesting birds, if present in existing trees and other vegetation in the vicinity. (PS)

Mitigation Measure:

BIO-2: Implement Mitigation Measure BIO-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.3 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impacts the Stadium Project may have on bird nests have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the impact on bird nests associated with the Project to less-than-significant levels. (LTS)*

Impact CULT-1: The Master Facilities Long-Range Plan could cause a substantial adverse change in the significance of archaeological deposits that qualify as historical resources, as defined in CEQA Guidelines Section 15064.5. Archaeological deposits could be unearthed or otherwise displaced during project ground disturbance below fill and the Holocene Bay Mud underlying the project site. (PS)

Mitigation Measure:

CULT-1: Should an archaeological deposit be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the California Register of Historical Resources), the District shall be responsible for funding and implementing appropriate mitigation measures. Mitigation measures may include recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate curation facility and used for public interpretive displays, as appropriate and in coordination with a local Native American tribal representative.

The District shall inform its contractor(s) of the sensitivity of the project area for archaeological deposits and shall verify that the following directive has been included in the appropriate contract documents:

> "The subsurface of the construction site may be sensitive for Native American archaeological deposits and associated human remains. If archaeological deposits are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any archaeological materials. Archaeological deposits can include shellfish remains; bones; flakes of, and tools made from, obsidian, chert, and basalt; and mortars and pestles. Contractor acknowledges and understands that excavation or removal of archaeological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5." (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impact the Master Facilities Long-Range Plan could have on archaeological deposits that qualify as historical resources have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the potential impact on archaeological deposits that qualify as historical resources to less-than-significant levels.(LTS)*

<u>Impact CULT-2</u>: The Master Facilities Long-Range Plan could cause a substantial adverse change in the significance of an archaeological resource, as defined in CEQA Guidelines Section 15064.5. Archaeological resources could be unearthed or otherwise displaced during project ground disturbance below fill and the Holocene Bay Mud underlying the project site. (PS)

<u>Mitigation Measure CULT-2</u>: Implement Mitigation Measure CULT-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential that ground disturbing activities could affect archaeological resources have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the potential impact of ground disturbing activities that may affect archaeological resources to less-than-significant levels. (LTS)*

<u>Impact CULT-3</u>: The Master Facilities Long-Range Plan could directly or indirectly destroy a unique paleontological resource or site by unearthing or otherwise displacing fossils that may occur below Holocene landforms underlying the project site. (PS)

<u>CULT-3</u>: Should paleontological resources be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. For purposes of this mitigation, a "qualified paleontologist" shall be an individual with the following qualifications: 1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; 2) at least two years of professional experience related to paleontology; 3) proficiency in recognizing fossils in the field and determining their significance; 4) expertise in local geology, stratigraphy, and biostratigraphy; and 5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the District for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be appropriate.

The District shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract documents:

"The subsurface of the construction site may be sensitive for fossils. If fossils are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, and bison. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5." (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts on unique paleontological resources or sites associated with the Project's ground-disturbing activities have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures would reduce the impact to less-than-significant levels. (LTS)*

Impact CULT-4: Ground-disturbing activities associated with the Master Facilities Long-Range Plan have the potential to unearth Native American human remains. (PS)

Mitigation Measure:

CULT-4: Any human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5 and Mitigation Measure CULT-1.

In addition, if human remains are identified during construction and cannot be preserved in place, the District shall fund 1) the removal of human remains from the project site by a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology, 2) the scientific analysis and documentation of the remains by a qualified archaeologist, and 3) the reburial of the remains, as appropriate. Excavation, analysis, and reburial of Native American human remains shall be done in consultation with the Native American Most Likely Descendent, as identified by the California Native American Heritage Commission. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with the Project's ground-disturbing activities have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures would reduce the impact to less-than-significant levels. (LTS)*

Impact CULT-5: The Master Facilities Long-Range Plan includes the construction of projects (Buildings 1, 2, 3, and 4) that do not yet have finalized designs and would be located near or adjacent to the original San Rafael High School building (Building A), a historical resource. Therefore, the proposed development would have the potential to cause a substantial adverse change in the significance of a historical resource. (PS)

Mitigation Measure:

CULT-5: Proposed Buildings 1, 2, 3, and 4, which are in the immediate vicinity of the historical resource (Building A), shall require review by an architectural historian or historic architect who meets the Secretary of the Interior's Qualification Standards and is retained by the District for the purpose of verifying compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Typically, if a project follows the Standards, impacts on a historical resource shall be considered mitigated to a less-than-significant level. Therefore, designs for proposed Buildings 1, 2, 3, and 4 shall comply with the Standards, in order to ensure that the construction would not indirectly alter the historical resource's (Building A's) physical characteristics, such as setting, that convey its historical significance such that it is no longer eligible for listing in the California Register of Historical Resources. In compliance with the applicable Standard (Standard 9), the new work shall be differentiated from the old and shall be compatible with massing, size, scale, and architectural features of the historical resource. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts on a historical resource have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures would reduce the impact to less-than-significant levels. (LTS)*

Impact CULT-6: The Master Facilities Long-Range Plan includes the modernization of the original San Rafael High School building (Building A), a historical resource. The changes would be primarily on the interior and there would be no change in the footprint. The design is not yet finalized and the proposed modernization

would have the potential to cause a substantial adverse change in the significance of a historical resource. (PS)

Mitigation Measure:

CULT-6: The proposed modernization of the historical resource (Building A), shall require review by an architectural historian or historic architect who meets the Secretary of the Interior's Qualification Standards and is retained by the District for the purpose of verifying compliance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (the Standards). Typically, if a project follows the Standards, impacts on a historical resource shall be considered mitigated to a less-than-significant level. Therefore, designs for the modernization of Building A shall comply with the Standards, in order to ensure that the construction would not directly alter the historical resource's (Building A's) physical characteristics, such as setting, that convey its historical significance such that it is no longer eligible for listing in the California Register of Historical Resources. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts on a historical resource have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures would reduce the impact to less-than-significant levels. (LTS)*

Impact CULT-7: The Stadium Project could cause a substantial adverse change in the significance of archaeological deposits that qualify as historical resources, as defined in CEQA Guidelines Section 15064.5. Archaeological deposits could be unearthed or otherwise displaced during project ground disturbance below fill and the Holocene Bay Mud underlying the project site. (PS)

Mitigation Measure:

CULT-7: Implement Mitigation Measure CULT-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impact the Stadium Project could have on archaeological deposits that qualify as historical resources have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the potential impact on archaeological deposits that qualify as historical resources to less-than-significant levels.(LTS)*

Impact CULT-8: The Stadium Project could cause a substantial adverse change in the significance of an archaeological resource, as defined in CEQA Guidelines Section 15064.5. Archaeological resources could be unearthed or otherwise displaced during project ground disturbance below fill and the Holocene Bay Mud underlying the project site. (PS)

Mitigation Measure:

CULT-8: Implement Mitigation Measure CULT-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the potential impact the Stadium Project could have on archaeological resources have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above measures would reduce the potential impact on archaeological resources to less-than-significant levels.(LTS)*

Impact CULT-9: The Stadium Project could directly or indirectly destroy a unique paleontological resource or site by unearthing or otherwise displacing fossils that may occur below Holocene landforms underlying the project site. (PS)

Mitigation Measure:

CULT-9: Implement Mitigation Measure CULT-3. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts on unique paleontological resources or sites associated with the Project's ground-disturbing activities have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures would reduce the impact to less-than-significant levels. (LTS)*

Impact CULT-10: Ground-disturbing activities associated with the Stadium Project have the potential to unearth Native American human remains. (PS)

Mitigation Measure:

CULT-10: Implement Mitigation Measure CULT-4. (LTS)

Facts: The relevant facts are set forth in Chapter 4.4 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with the Project's ground-disturbing activities have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures would reduce the impact to less-than-significant levels. (LTS)*

Impact GEO-1: During its design life, development under the Master Facilities Long-Range Plan would likely be subject to strong groundshaking from a seismic event, creating the potential for a significant risk to structures and human lives. (PS)

Mitigation Measure:

GEO-1: The San Rafael City Schools Board of Trustees shall demonstrate that school building design and construction comply with applicable requirements of the Field Act, including design, oversight, and inspection provisions. This shall include incorporation of public school seismic design standards established by the Division of the State Architect (DSA), review of plans by DSA, and inspections throughout construction by independent qualified inspectors. Prior to occupancy of new development under the Master Facilities Long-Range Plan, San Rafael City Schools must receive a certification of compliance from DSA that oversight and inspection of construction was completed in accordance with Field Act and other DSA requirements in accordance with DSA Procedure 13-02. (LTS)

Facts: The relevant facts are set forth in Chapter 4.5 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate damage to structures and risk to human life associated with seismic groundshaking at the site have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of damage to structures and risk to human life associated with seismic groundshaking at the site to a less-than-significant level. (LTS)*

Impact GEO-2: The Master Facilities Long-Range Plan would have the potential to expose people or structures to substantial adverse effects involving seismic-related ground failure, including liquefaction. (PS)

Mitigation Measure:

GEO-2: For each project under the Master Facilities Long-Range Plan, the District shall ensure compliance with Mitigation Measure GEO 1. (LTS)

Impact GEO-3: Expansive, potentially unstable, and corrosive soils at the project site could result in structural damage to project improvements, creating the potential for a significant risk to structures and human lives. (PS)

Mitigation Measure

GEO-3: For each project under the Master Facilities Long-Range Plan, the District shall ensure compliance with Mitigation Measure GEO-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.5of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate the exposure of people or structures to risks from expansive, potentially unstable, and corrosive soils at the project site have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of exposure of people or structures to risks from expansive, potentially unstable, and corrosive soils to a less-than-significant level. (LTS)*

Impact GEO-4: During its design life, the Stadium Project would likely be subject to strong groundshaking from a seismic event, creating the potential for a significant risk to structures and human lives. (PS)

Mitigation Measure:

GEO-4: Implement Mitigation Measure GEO-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.5 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate damage to structures and risk to human life associated with seismic groundshaking at the site have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of damage to structures and risk to human life associated with seismic groundshaking at the site to a less-than-significant level. (LTS)*

Impact GEO-5: The Stadium Project would have the potential to expose people or structures to substantial adverse effects involving seismic-related ground failure, including liquefaction. (PS)

Mitigation Measure:

GEO-5: Implement Mitigation Measure GEO-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.5 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate damage to structures and risk to human life associated with seismic related ground failure, including liquefaction, at the site have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of damage to structures and risk to human life associated with seismic related ground failure, including liquefaction at the site to a less-than-significant level. (LTS)*

Impact GEO-6: Potentially unstable soils at the Stadium Project site could result in structural damage to project improvements, creating the potential for a significant risk to structures and human lives. (PS)

Mitigation Measure:

GEO-6: Implement Mitigation Measure GEO-1. (LTS)

Facts: The relevant facts are set forth in Chapter 4.5 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate damage to structures and risk to human life associated with potentially unstable soils at the site have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of damage to structures and risk to human life associated with potentially unstable soils at the site to a less-than-significant level. (LTS)*

Impact HAZARDS-1: Development of the Master Facilities Long-Range Plan could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, as demolition of existing structures could expose students and other members of the general public to hazardous materials related to building materials. (PS)

Mitigation Measure:

HAZARDS-1: The San Rafael City Schools shall comply with provisions of the Department of Toxic Substances Control (DTSC) School Property Evaluation and Cleanup Program for development under the Master Facilities Long-Range Plan. This compliance shall include evaluation of potential hazards related to building materials in accordance with DTSC's Preliminary Endangerment Assessment Guidance Manual (Guidance Manual) and DTSC's Interim Guidance for Evaluation of School Sites With Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers (Interim Guidance). This compliance shall include an assessment of the potential for lighting fixtures and caulking in buildings constructed

prior to 1977 to contain polychlorinated biphenyls (PCBs), and the abatement of any materials containing PCBs above risk-based thresholds in the Guidance Manual. This compliance shall also include soil sampling in accordance with methodology in the Interim Guidance. Any contaminants identified above concentrations in the Data Interpretation and Assessment section of the Interim Guidance shall require remedial action under DTSC oversight. (LTS)

Facts: The relevant facts are set forth in Chapter 4.7 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with upset and accident conditions and demolition of existing structures on the public or environment have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of impact to a less-than-significant level. (LTS)*

Impact HAZARDS-2: Development of the Stadium Project could create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions, as demolition of existing structures has the potential to expose students and other members of the general public to hazardous materials related to building materials. (PS)

Mitigation Measure:

HAZARDS-2: Implement Mitigation Measure HAZARDS-1 (LTS)

Facts: The relevant facts are set forth in Chapter 4.7 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with upset and accident conditions and demolition of existing structures on the public or environment have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of impact to a less-than-significant level. (LTS)*

Impact NOISE-1: Development under the Master Facilities Long-Range Plan could expose persons to or generate a permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (PS)

Mitigation Measure

NOISE-1: San Rafael City Schools shall use mechanical equipment selection and acoustical shielding to ensure that noise levels from the installation/modification of heating, ventilation, and air conditioning (HVAC) systems do not exceed 45 dBA Leq

inside of the nearest on-campus buildings, and do not exceed 60 dBA Lmax/50 dBA Leq during the daytime and 50 dBA Lmax/45 dBA Leq during the nighttime at the nearest residential receptors. Controls that would typically be incorporated to attain this outcome include locating equipment indoors or in less noise-sensitive areas, when feasible; selecting quiet equipment; and providing sound attenuators on fans, sound attenuator packages for cooling towers and emergency generators, acoustical screen walls, and equipment enclosures. (LTS)

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with exposure to or generation of a permanent increase in ambient noise levels in excess of established standards have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of impact to a less-than-significant level. (LTS)*

Impact NOISE-2: Development under the Master Facilities Long-Range Plan could generate periodic increases in ambient noise levels in the project vicinity and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (PS)

Mitigation Measure

NOISE-2: San Rafael City Schools shall consult a qualified acoustical engineer in the design and selection of the new public address (PA) system for the Stadium Project. The qualified acoustical engineer shall confirm that sound is directed toward the field in a manner that reduces noise levels generated by the use of the PA system at approximately 50 feet outside the fence line of the school to below 80 dBA L_{max} to the maximum extent practicable (but in no case shall the new PA system increase noise levels relative to the existing system). (LTS)

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with periodic noise increases have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of impact to a less-than-significant level. (LTS)*

Impact NOISE-3: Construction of the facilities proposed under the Master Facilities Long-Range Plan could generate temporary increases in ambient noise levels in the project vicinity and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (PS)

Mitigation Measures

NOISE-3a: To the maximum extent practicable, San Rafael City Schools shall schedule construction activities during periods when classes are not in session, such as summer, school breaks, and after class dismissal. San Rafael City Schools shall not allow the use of heavy construction equipment during established testing periods (e.g., finals week).

NOISE-3b: For each project under the Master Facilities Long-Range Plan, a Construction Noise Management Plan shall be prepared by a qualified acoustical consultant and included in all contractor specifications. The Construction Noise Management Plan shall contain a set of site-specific noise attenuation measures to further reduce construction noise impacts at the nearby on-campus buildings and off-site residential receptors. If appropriate based on the circumstances, multiple projects can be addressed under one Construction Noise Management Plan. The site-specific noise attenuation measures shall be designed to reduce noise levels at the nearest on-campus and off-site receptors to below 70 dBA Leq, as practical. The nearest on-campus receptors may be located adjacent to construction and demolition locations. If it is not feasible to reduce noise at the nearest on-campus receptors to below 70 dBA Leq due to their proximity to the nearest construction and demolition locations, the school shall relocate students to classrooms with interior noise levels below 45 dBA Leq. At a minimum, the following measures shall be included in the Construction Noise Management Plan:

- Construct or use temporary noise barriers, as needed, to shield on-campus construction and demolition noise from noise-sensitive areas to the extent feasible. To be most effective, the barrier should be placed as close as possible to the noise source or the sensitive receptor. Examples of barriers include portable acoustically lined enclosure/housing for specific equipment (e.g., jackhammer and pneumatic-air tools, which generate the loudest noise), temporary noise barriers (e.g., solid plywood fences or portable panel systems, minimum 8 feet in height), and/or acoustical blankets, as feasible.
- To the extent feasible, establish construction staging areas at locations that would create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Ensure that construction equipment and trucks use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures and acoustically-attenuating shields or shrouds) wherever feasible.
- Use "quiet" models of air compressors and other stationary noise sources where technology exists.
- Prohibit all unnecessary idling of internal combustion engines and equip all internal combustion engine-driven equipment with an operating muffler or baffling system that are in good condition and appropriate for the equipment.
- Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from noise-sensitive land uses. Muffle the stationary equipment, and enclose within temporary sheds or surround by insulation barriers, if feasible.

NOISE-3c: San Rafael City Schools shall develop a set of procedures for responding to and tracking complaints received pertaining to construction noise, and shall implement the procedures during construction of projects implemented under the Master Facilities Long-Range Plan. Contractor specifications shall include these procedures. At a minimum, the procedures shall include:

a) Designation of a construction complaint and enforcement manager for the project;

b) Protocols specific to receiving, responding to, and tracking received complaints; and

c) Maintenance of a complaint log that records received complaints and how complaints were addressed.

The contact information of the construction complaint and enforcement manager shall be posted in conspicuous locations at the construction site.

NOISE-3d: Residences located within 250 feet of a project implemented under the Master Facilities Long-Range Plan shall be provided with written notice of construction activity within at least 10 days before work begins, except in the case of an emergency. The notice shall state the date of planned construction activity in proximity to that residence and the range of hours during which maximum noise levels are anticipated. The notice shall also include the contact information of the construction complaint and enforcement manager identified in Mitigation Measure NOISE 3c.

The combination of the above measures would reduce this impact to a less-than-significant level. (LTS)

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with temporary noise increases have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the possibilities of impact to a less-than-significant level. (LTS)*

Impact NOISE-4: Development under the Master Facilities Long-Range Plan could expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. (PS)

Mitigation Measure

NOISE-4: Mitigation Measures NOISE-3a through NOISE-3d shall be implemented. *(LTS)*

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with ground vibration and noise have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the impact to a less-than-significant level. (LTS)*

***Impact NOISE-5*: Development of the proposed Stadium Project could generate periodic increases in ambient noise levels in the project vicinity above levels existing without the project and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (PS)**

Mitigation Measure

NOISE-5: Mitigation Measure NOISE-2 shall be implemented. (LTS)

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with periodic noise increases have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the impact to a less-than-significant level. (LTS)*

Impact NOISE-6: Construction of the proposed Stadium Project could generate a temporary increase in ambient noise levels in the project vicinity above levels existing without the project and in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. (PS)

Mitigation Measure

NOISE-6: Mitigation Measure NOISE-3a through NOISE-3d shall be implemented. (LTS)

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with temporary noise increases have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the impact to a less-than-significant level. (LTS)*

Impact NOISE-7: Development of the proposed Stadium Project could expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. (PS)

Mitigation Measure

NOISE-7: Mitigation Measure NOISE-3a through NOISE-3d shall be implemented. (LTS)

Facts: The relevant facts are set forth in Chapter 4.10 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with ground borne vibration or ground borne noise levels have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the impact to a less-than-significant level. (LTS)*

Impact TRANS-1: Assuming student travel mode shares and vehicle trip distribution patterns remain consistent with those under existing conditions, implementation of the Master Facilities Long-Range Plan would increase single-occupancy vehicular travel as well as overall vehicular traffic levels along key access roadways, including Mission Avenue and 3rd Street. The addition of these Long-Range Plan-related vehicular trips would degrade traffic flows along these key access roadways. Maintaining the existing student travel mode shares and the resulting increase in single-occupancy vehicular travel would conflict with the city-wide policies and programs established to manage congestion and improve mobility as documented in the San Rafael General Plan. These Long-Range Plan-related conditions would particularly conflict with Program C-11e (Reduction of Single Occupant Vehicles) and Program C-13a (School Transportation). (PS)

Mitigation Measures

TRANS-1a: San Rafael City Schools shall develop a Transportation Demand Management (TDM) program for San Rafael High School that focuses on reducing vehicle trips and improving traffic flow by implementing a series of measures including, but not limited to, the following:

- Updating and enforcing elements of the school's transportation measures in the School Handbook, such as requiring on-site parking permits; instructing parents and students on expected travel routes to use, drop-off/pick-up locations, and appropriate driver behaviors; and providing bus stop and bus route information.
- Working with the San Rafael High School Athletic Department to ensure that sports-related drop-offs and pick-ups are directed to use the school parking lots accessible via 3rd Street.
- Providing wayfinding signage and informational material (e.g., flyers, emails, etc.) to visitors prior to major sports and/or special events that would direct traffic to the 3rd Street driveways.

- Considering promotion of carpool trips, and designating specific on-site parking spaces for carpool use only.
- Enrolling and actively participating in Marin County's Safe Routes to School program to take advantage of resources focused on reducing single-student occupant vehicle trips and to promote walking, bicycling, use of public transit, and carpooling.
- Providing personnel (trained using the American Automobile Associate School Safety Patrol curriculum) to monitor and facilitate drop-off and pick-up activities along Mission Avenue.
- Conducting periodic monitoring of traffic, including single-student occupant vehicles and carpools, pedestrian and bicycle trips, and school trips made by public transit to gauge success and promote appropriate measures to reduce vehicle trips.

TRANS-1b: To the extent feasible, San Rafael City Schools shall work with the City of San Rafael to update the listed address of San Rafael High School such that the school's main access point is identified with a 3rd Street address rather than its current designated 185 Mission Avenue address. The implementation of this mitigation measure would encourage some traffic, including sports events traffic and freight traffic, away from neighborhood streets north of the SRHS campus and onto 3rd Street.

Successful implementation of a TDM program that retains current traffic levels, or reduces traffic levels, with the addition of up to 200 additional students would reduce Impact TRANS 1 to a less-than-significant level. (LTS)

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential impacts associated with potential conflicts with policies for congestion management and improved mobility have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the potential impact to a less-than-significant level. (LTS)*

Impact TRANS-6: The construction of components of the Master Facilities Long-Range Plan would add construction-related vehicle trips to City of San Rafael and other jurisdictional roadways, creating temporary traffic hazards. These conditions would conflict with San Rafael General Plan Program C-4a (Street Pattern and Traffic Flow). (PS)

Mitigation Measure

TRANS-6: Development under the Master Facilities Long-Range Plan shall abide by the City of San Rafael's provisions regarding transportation and parking management during demolition and construction activities. In addition, San Rafael City Schools shall develop a demolition/construction traffic management plan defining hours of operation, specified truck routes, and construction parking provisions. The District shall ensure that any parking losses associated with construction vehicles does not

affect parking availability on campus. To the greatest extent possible, the District shall direct all construction truck traffic to travel to and from the campus via 3rd Street. Implementation of this measure would reduce Impact TRANS-6 to a less-than-significant level. *(LTS)*

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential construction traffic impacts have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the potential impact of construction traffic impacts to a less-than-significant level. (LTS)*

Impact TRANS-7: The construction of components of the Stadium Project would add construction-related vehicle trips to City of San Rafael and other jurisdictional roadways, creating temporary traffic hazards. These conditions would conflict with San Rafael General Plan Program C-4a (Street Pattern and Traffic Flow). (PS)

Mitigation Measure

TRANS-7: The Stadium Project shall abide by the City of San Rafael's provisions regarding transportation and parking management during demolition and construction activities. In addition, San Rafael City Schools shall develop a demolition/construction traffic management plan defining hours of operation, specified truck routes, and construction parking provisions. Implementation of this measure would reduce Impact TRANS-7 to a less-than-significant level. (LTS)

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate potential construction traffic impacts have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce the potential impact of construction traffic impacts to a less-than-significant level. (LTS)*

Impact REC-1: The Master Facilities Long-Range Plan would include recreational facilities that might have an adverse physical effect on the environment. (PS)

Mitigation Measure REC-1: San Rafael City Schools shall comply with all mitigation measures identified in this EIR. Compliance with these measures would ensure that the impact of recreational facilities included in the Master Facilities Long-Range Plan would be reduced to a less-than-significant level. (LTS)

Facts: The relevant facts are set forth in Chapter 4.15 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate impacts associated with recreational facilities included in the project that might have an adverse effect on the environment have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce impacts associated with recreational facilities to a less-than-significant level. (LTS)*

Impact REC-2: The Stadium Project would consist of recreational facilities that might have an adverse physical effect on the environment. (PS)

Mitigation Measure

REC-2: San Rafael City Schools shall comply with all mitigation measures for the Stadium Project that are identified in this EIR. Compliance with these measures would ensure that the impact of Stadium Project would be reduced to a less-than-significant level. (LTS)

Facts: The relevant facts are set forth in Chapter 4.15 of the EIR.

Findings:

1) *The mitigation measures recommended in the EIR to mitigate impacts associated with recreational facilities included in the project that might have an adverse effect on the environment have been adopted as stated in the approval resolution.*

2) *Based on the whole record, the Board finds that implementation of the above mitigation measures in the project would reduce impacts associated with recreational facilities to a less-than-significant level. (LTS)*

D.3. Impacts Analyzed in the Draft EIR and Determined to be Significant and Unavoidable.

The following traffic impacts were determined to be significant and unavoidable:

Impact TRANS-2: The addition of project-generated vehicular traffic onto local roadways would increase traffic congestion, particularly on Mission Avenue due to increased drop-off and pick-up activities. This would deteriorate traffic flow along Mission Avenue, which lacks adequate loading and unloading zones. This would also present a safety hazard as it would increase potential conflicts between vehicular traffic and pedestrian and bicycle traffic. These impacts would conflict with the San Rafael General Plan Program C-4a (Street Pattern and Traffic Flow). (PS)

Mitigation Measures

TRANS-2a: San Rafael City Schools shall, as feasible, work with the City of San Rafael to extend westward the existing passenger loading zone by up to

300 feet, for a new passenger loading zone spanning the length of the south side of Mission Avenue between Alice Street and Park Street.

The extension of the loading zone would be accomplished either by painting the adjacent roadway curb white or moving the roadway's curb and sidewalk south, if feasible. Accompanying signage would also be installed that would designate the area as a passenger loading zone. The loading zone extension would result in the loss of about 12 vehicular parking spaces. However, the zone would enhance roadway safety by increasing the designated area of drop-off, allowing vehicles to pull over for drop-off and pick-up activities and avoid hindering traffic flow along Mission Avenue.

TRANS-2b: The District shall consider the implementation of a remote drop-off and pick-up program. The program would designate off-site passenger loading location to divert school-related vehicle trips to locations within a one-quarter-mile radius of the site. This would reduce traffic congestion along neighborhood streets adjacent to the school site, and promote student health by allowing students to walk the distance between the off-site location and the school campus. The mitigation measure would support San Rafael General Plan Program C-4a (Street Pattern and Traffic Flow) and Program C-13a (School Transportation).

The roadway curb and potential remote drop-off and pick-up locations fall under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would be subject to approval by the City's Public Works Department. Implementation of this measure would reduce Impact TRANS-2 to a less-than-significant level, but because the mitigation measure requires coordination with the City of San Rafael, its implementation cannot be assured. The impact is therefore considered significant and unavoidable. (SU)

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

(1) To mitigate impacts associated with increased traffic and safety hazards on Mission Avenue, the EIR recommends that, as feasible, San Rafael City Schools shall work with the City of San Rafael to extend westward the existing passenger loading zone by up to 300 feet, for a new passenger loading zone spanning the length of the south side of Mission Avenue between Alice Street and Park Street. This mitigation measure has been adopted as stated in the approval resolution.

(2) To mitigate impacts associated with increased traffic and safety hazards on Mission Avenue, The District shall consider the implementation of a remote drop-off and pick-up program, and, since this would be subject to approval by the City's Public Works Department, the District shall coordinate this mitigation measure with the City of San Rafael. This mitigation measure has been adopted as stated in the approval resolution.

(3) The EIR's discussion and analysis is incorporated herein. Based on the whole record, the Board finds that:

a. *The roadway curb falls under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would be subject to approval by the City's Public Works Department. Coordination with the City would be required. Furthermore, a funding source for the recommended improvements is unknown. Therefore, implementation of the recommended changes cannot be assured.*

b. *The potential remote drop-off and pick-up locations fall under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would be subject to approval by the City's Public Works Department. Coordination with the City would be required. Furthermore, a remote location has yet to be identified, and the District would need to work with the city and neighborhood. Therefore, implementation of the recommended changes cannot be assured.*

c. *For these reasons, the project's impact on traffic described above cannot be mitigated to a less than significant level. (SU)*

(4) This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

Rationale:

The EIR's discussion and analysis is incorporated herein.

Removing all traffic from the Mission Avenue corridor would not be feasible and would result in significantly more traffic on 3rd Street. The recommended loading zone extension would result in the loss of about 12 vehicular parking spaces. However, the zone would enhance roadway safety by increasing the designated area of drop-off, allowing vehicles to pull over for drop-off and pick-up activities and avoid hindering traffic flow along Mission Avenue.

The roadway curb and potential remote drop-off and pick-up locations fall under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would be subject to approval by the City's Public Works Department. Coordination with the City would be required. The District will work with the City, but the District is unable to assure implementation of the recommended changes.

Furthermore, a funding source for the recommended improvements to the roadway curb is unknown. The availability of funds to cover the recommendations of Mitigation Measure TRANS-2a cannot be determined at this time, and CEQA does not require that this funding availability be addressed. The reason that the impact was identified as significant and unavoidable is because certain recommended measures require the involvement of the City of San Rafael and/or are subject to funding availability, which is unknown, and the District therefore does not have control over these measures. Without available funding, implementation of Mitigation Measure TRANS-2a would be infeasible.

As for the potential remote drop-off and pick-up locations, if feasible, the program would redirect school-generated traffic to an off-site location that would allow students to walk the remainder of the way, thereby decreasing traffic congestion within the immediate vicinity of the SRHS campus. Currently, no site has been

identified for remote pick-ups and drop-offs. However, the District would meet with the City within 3 to 6 months of certification of the EIR to discuss, as feasible, this and other proposed mitigation measures.

Mitigation Measure TRANS-2 is not a stand-alone mitigation measure. The District would work with the City, as feasible, to implement TRANS-2 with Mitigation Measures TRANS-1 through TRANS-7, as feasible, which would reduce the overall traffic volumes along Mission Avenue.

Impact TRANS-3: The addition of project-generated vehicular traffic would increase average vehicular delay by more than 5 seconds at two intersections— Union Street/Mission Avenue, and San Rafael High School Driveway (West)/3rd Street—under near-term (year 2020) plus Master Facilities Long-Range Plan conditions, and at two intersections— Union Street/Mission Avenue and San Rafael High School Driveway (West)/3rd Street—under cumulative (year 2040) plus Master Facilities Long-Range Plan conditions. The additional average vehicular delay under near-term (year 2020) plus Master Facilities Long-Range Plan conditions would degrade intersection operating conditions from level of service (LOS) D to LOS F at one intersection. The additional average vehicular delay and degradation of level of service operations would represent a significant impact as defined by City of San Rafael significance thresholds. (PS)

Mitigation Measures

TRANS-3a: As feasible, San Rafael City Schools shall work with the City of San Rafael to implement the reconfiguration of the Union Street/Mission Avenue intersection to provide two lanes in the westbound direction (a left-turn lane, and a shared through and right-turn lane) and two lanes in the northbound direction (a shared through and left-turn lane, and a right-turn lane). The additional lanes could be introduced by restriping the existing roadway to provide the additional lane markings within the existing right-of-way.

The intersection reconfiguration would require use of the roadway's existing width to accommodate the additional lanes. This would be achieved by removing up to 160 feet of parking along both sides of westbound Mission Avenue, causing the loss of approximately eight parking spaces on both sides of the street, including the passenger loading zone on the south side of Mission Avenue. However, as detailed in the parking study (provided in Appendix F-7 of this EIR), the adjacent streets are operating at under 70 percent occupancy levels and could accommodate the parking demand from the displaced parking spaces.

If feasible, and to the extent that California Department of Education (CDE)-mandated school site size requirements (CDE Guide to School Site Analysis and Development 2000 Report) would not be violated, an alternative roadway reconfiguration could include potentially moving the roadway curb and sidewalk southerly (onto District property) to provide the extra lane width and minimize the loss of parking along Mission Avenue.

The new lane reconfiguration would potentially reduce vehicular queue lengths along the westbound direction of Mission Avenue to under 100 feet in near-term (year 2020) plus Master Facilities Long-Range Plan conditions and under 120 feet in cumulative (year 2040) plus Master Facilities Long-Range Plan conditions.

TRANS-3b: There is no feasible measure to mitigate the intersection impacts at the two San Rafael High School driveway intersections along 3rd Street.

Vehicles turning left from the driveway south of the San Rafael High School driveway (west)/3rd Street intersection would experience an increase of up to about 46 seconds of delay under the Cumulative (year 2040) plus Master Facilities Long-Range Plan conditions. Under this scenario, this movement is projected to be about 11 vehicles during the morning peak hour. These vehicles would have to wait for sufficient gaps in traffic to make the left turn. While the additional delay would inconvenience these vehicles, it would only occur during the very short peak hours of school-related vehicular trip generation and would dissipate thereafter.

Implementation of Mitigation Measure TRANS-3a would reduce the impact at the Union Street/Mission Avenue intersection to a less-than-significant level. However, the improvement's design and construction would be subject to approval and implementation by the City of San Rafael Public Works Department, and therefore its implementation cannot be assured. There is no feasible mitigation for impacts at the two San Rafael High School driveway impacts on 3rd Street. Impact TRANS-3 would therefore remain significant and unavoidable. (SU)

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

(1) To mitigate impacts associated with vehicular delay at intersections, the EIR recommends that, as feasible, San Rafael City Schools shall work with the City of San Rafael to implement the reconfiguration of the Union Street/Mission Avenue intersection to provide two lanes in the westbound direction (a left-turn lane, and a shared through and right-turn lane) and two lanes in the northbound direction (a shared through and left-turn lane, and a right-turn lane). This mitigation measure has been adopted as stated in the approval resolution.

(2) As identified in the EIR, there is no feasible measure to mitigate the intersection impacts at the two San Rafael High School driveway intersections along 3rd Street.

(3) The EIR's discussion and analysis is incorporated herein. Based on the whole record, the Board finds that:

a. The reconfiguration of the Union Street/Mission Avenue intersection under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would require approval of and implementation by the City. Furthermore, a funding source for the recommended improvements is unknown. Therefore, implementation of the recommended changes cannot be assured.

b. There is no feasible measure to mitigate the intersection impacts at the two San Rafael High School driveway intersections along 3rd Street.

c. For these reasons, the project's impact on traffic described above cannot be mitigated to a less than significant level. (SU)

(4) This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

Rationale:

The EIR's discussion and analysis is incorporated herein.

The intersection reconfiguration would require use of the roadway's existing width to accommodate the additional lanes. This would be achieved by removing up to 160 feet of parking along both sides of westbound Mission Avenue, causing the loss of approximately eight parking spaces on both sides of the street, including the passenger loading zone on the south side of Mission Avenue. However, as detailed in the parking study (provided in Appendix F-7 of the EIR), the adjacent streets are operating at under 70 percent occupancy levels and could accommodate the parking demand from the displaced parking spaces.

The recommended intersection reconfiguration falls under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would require approval of and implementation by the City. Furthermore, a funding source for the recommended improvements is unknown. The District will work with the City, but the District is unable to assure implementation of the recommended changes.

With respect to Mitigation Measure TRANS-3b, there is no feasible measure to mitigate the intersection impacts at the two San Rafael High School driveway intersections along 3rd Street. Vehicles turning left from the driveway south of the San Rafael High School driveway (west)/3rd Street intersection would experience an increase of up to about 46 seconds of delay under the Cumulative (year 2040) plus Master Facilities Long-Range Plan conditions. Under this scenario, this movement is projected to be about 11 vehicles during the morning peak hour. These vehicles would have to wait for sufficient gaps in traffic to make the left turn. While the additional delay would inconvenience these vehicles, it would only occur during the very short peak hours of school-related vehicular trip generation and would dissipate thereafter.

Mitigation Measure TRANS-3 is not a stand-alone mitigation measure. The District would work with the City, as feasible, to implement TRANS-3 with Mitigation Measures TRANS-1 through TRANS-7, as feasible, which would reduce vehicular delay at intersections.

<u>Impact TRANS-4</u>: Implementation of the Master Facilities Long-Range Plan would increase the number of students walking and bicycling along key routes, including roadways and sidewalks, and across curb ramps and crosswalks. Many of the existing pedestrian and bicycle facilities serving the San Rafael High School campus do not adequately accommodate the existing levels of pedestrian traffic and would be further degraded with the addition of pedestrian and bicycle traffic generated by the Long-Range Plan. The increased traffic would decrease the overall performance and safety of these facilities. (PS)

Mitigation Measures

TRANS-4a: As feasible, San Rafael City Schools shall work with the City of San Rafael to implement the design and construction of the following school-area improvements:

- Upgrading all school area traffic controls in accordance with Chapter 7 (Controls for School Areas) of the California Manual of Uniformed Traffic Control Devices (MUTCD). For the District, upgrades would include increasing school-related signage (e.g., School Ahead, School Crosswalk, etc.) and pavement markings (e.g., Slow School Xing), and refreshing crosswalks and pavement stencils along roadways serving the campus (i.e., Mission Avenue between Mary Street and Belle Avenue, Union Street between 3rd Street and Mission Avenue, and Mary Street Between 3rd Street and Mission Avenue).

- Constructing about 100 feet of sidewalk along the north side of Mission Avenue just east of Belle Avenue, to fill a sidewalk gap at a well-trafficked intersection.

- Reconstructing non-compliant curb ramps, as appropriate, to meet Americans with Disabilities Act (ADA) standards at intersection locations peripheral to the school i.e., San Rafael High School Driveway (East)/3rd Street, Mission Avenue/Belle Avenue, Mission Avenue/Alice Street, and Mission Avenue/Union Street.

- Providing enhanced crosswalks (e.g., rectangular rapid flashing beacons, pedestrian hybrid beacon, and/or lighting), if considered warranted by the City of San Rafael Public Works Department, at the 3rd Street's crosswalk at Embarcadero Way and at Union Street's crosswalk at 4th Street.

- Endorsing the City of San Rafael's efforts to improve pedestrian conditions along the south side of Mission Avenue between Belle Avenue and Embarcadero Way. Future improvements could include, but would not be limited to, providing earthwork and/or structural fill along the hillside, a continuous pedestrian walkway, and additional supply of on-street parking.

TRANS-4b: As feasible, San Rafael City Schools shall work with the City of San Rafael to implement the design and construction of an enhanced crosswalk across 3rd Street at the San Rafael High School Driveway (West)/3rd Street intersection. As feasible and necessary, the crosswalk would include a pedestrian refuge island and rectangular rapid flashing beacons to facilitate pedestrian crossing at this intersection.

TRANS-4c: San Rafael City Schools shall enroll and actively participate in Marin County's Safe Routes to School program and host educational programs that inform students of pedestrian behavior that would enhance safety when walking to and from school.

These mitigation measures would improve pedestrian and bicyclist facilities serving the San Rafael High School campus. The measures would enhance pedestrian and bicyclist safety within the vicinity of the campus by increasing visibility and reducing potential points of conflict with vehicular traffic. The measures would comply with the City of San Rafael's Bicycle/Pedestrian Master Plan Policy C-1 (Complete missing connections to establish direct routes for walking), Policy C-2 (Identify and mitigate impediments and obstacles to walking to school, such as through a Safe Routes to School program), and

Policy C-4 (Support the installation of appropriate pedestrian facilities as part of all new transportation improvements, development projects and transit facilities).

Implementation of the above measures would reduce Impact TRANS-4 to a less-than-significant level. However, since the design and implementation of the above measures shall be subject to approval and implementation by the City of San Rafael Public Works Department, their implementation cannot be assured. Impact TRANS-4 would therefore remain significant and unavoidable. (SU)

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

(1) To mitigate impacts on pedestrian and bicycle facilities and safety, the EIR recommends that, as feasible, San Rafael City Schools shall work with the City of San Rafael, as feasible, to implement the design and construction of school-area improvements, including traffic controls, curb ramps, enhanced cross-walks, and a sidewalk extension along the north side of Mission. The District will endorse the City's efforts to increase pedestrian improvements. This mitigation measure has been adopted as stated in the approval resolution.

(2) To mitigate impacts on pedestrian and bicycle facilities and safety, the EIR recommends that, as feasible, San Rafael City Schools shall work with the City of San Rafael, as feasible, to implement the design and construction of an enhanced crosswalk across 3rd Street at the San Rafael High School Driveway. This mitigation measure has been adopted as stated in the approval resolution.

(3) To mitigate impacts on pedestrian and bicycle facilities and safety, the EIR recommends that, as feasible, San Rafael City Schools enroll and actively participate in Marin County's Safe Routes to School program, and host related educational programs. This mitigation measure has been adopted as stated in the approval resolution.

(4) The EIR's discussion and analysis is incorporated herein. Based on the whole record, the Board finds that:

a. The design and construction of school-area improvements is under the jurisdiction of the City of San Rafael, and therefore the improvements recommended in this mitigation measure would require approval of and implementation by the City. Furthermore, a funding source for the recommended improvements is unknown. Therefore, implementation of the recommended improvements cannot be assured.

b. The design and construction of an enhanced crosswalk across 3rd Street at the San Rafael High School Driveway is under the jurisdiction of the City of San Rafael, and therefore the improvements recommended in this mitigation measure would require approval of and implementation by the City. Furthermore, a funding source for the recommended improvements is unknown. Therefore, implementation of the recommended improvements cannot be assured.

c. For these reasons, the project's impact on traffic described above cannot be mitigated to a less than significant level. (SU)

(5) This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

Rationale:

The EIR's discussion and analysis is incorporated herein.

The recommended school-area improvements and enhanced cross-walk fall under the jurisdiction of the City of San Rafael, and therefore the changes recommended in this mitigation measure would require approval of and implementation by the City. Furthermore, a funding source for the recommended improvements is unknown. The District will work with the City, but the District is unable to assure implementation of the recommended improvements.

Although the District would enroll and actively participate in Marin County's Safe Routes to School program and host educational programs about safe routes to school in accordance with Mitigation Measure TRANS-4c, off-site bicycle and pedestrian circulation and improvements are under City jurisdiction and require City approval, and the District is unable to assure implementation of the recommended improvements under TRANS-4a and TRANS-4b.

The District will also work with the Marin County Safe Routes to School program to identify potential incentives that could be used to encourage both students and faculty to embrace more sustainable modes of travel such as walking, bicycle, transit, and carpooling as a means of traveling to and from school. The District also plans to work with the Safe Routes to School program and the City to schedule a walking and bicycling audit along streets surrounding the SRHS campus. The purpose of the audit would be to identify safety concerns that hinder student travel to and from school by walking and bicycling. The District plans to work with the City to conduct bi-annual student travel surveys that would identify the number of students traveling to and from school by bicycle. Each year, the District would review the share of students traveling by bicycle against the bicycle parking inventory and provide additional bicycle parking on-campus as necessary.

As part of the Project, the District would increase on-campus bicycle parking facilities to safely and securely accommodate up to 100 bicycles. Currently 3 to 4 percent of students travel to and from school by bicycle, and the proposed bicycle facilities would adequately accommodate the demand for bicycle parking.

Mitigation Measure TRANS-4 is not a stand-alone mitigation measure. The District would work with the City and Safe Routes to School, as feasible, to implement TRANS-4 with Mitigation Measures TRANS-1 through TRANS-7, as feasible, which would reduce impacts on pedestrian and bicycle facilities and safety.

<u>Impact TRANS-5</u>: Implementation of the Master Facilities Long-Range Plan would increase the number of students bicycling along key routes, including roadways and sidewalks, and across crosswalks. Since none of these roadways are wide enough to include separated bicycle lanes, cyclists would be required to share vehicular travel lanes or ride along sidewalks. These conditions would discourage

the use of alternative modes of transportation and conflict with the San Rafael General Plan Policy C-11 (Alternative Transportation Mode Users). (PS)

Mitigation Measures

TRANS-5a: San Rafael City Schools shall increase the capacity of the on-campus bicycle parking facility to safely and securely accommodate up to 100 bicycles.

TRANS-5b: San Rafael City Schools shall work with the City of San Rafael and Marin County's Safe Routes to Schools program in efforts to obtain a grant to conduct a study on the feasibility of implementing a new bicycle and pedestrian pathway to serve the San Rafael High School campus. The pathway could provide access to the school from either the intersection of Union Street/4th Street, along the south of Mission Avenue just east of Park Street, along the north side of 3rd Street, or at other locations to be identified upon further study. The intent of the path would be to directly link to campus walking paths and bicycle parking. The study shall identify potential pathway alignments, impacts, and connection details, as well as circulation along 4th Street to the west and Mission Avenue to the north. The feasibility study, funded by grant funds as available, shall be conducted in coordination with the City of San Rafael Public Works Department. If feasible, the pathway shall be constructed and shall be coordinated with implementation of the Master Facilities Long-Range Plan.

TRANS-5c: San Rafael City Schools shall enroll and actively participate in Marin County's Safe Routes to School program and (among other activities) host educational and encouragement programs that inform students of the benefits of bicycling to and from school.

The implementation of these measures (except the provision of additional bicycle parking recommended in Mitigation Measure TRANS-5a) requires the involvement of the City of San Rafael and Marin County's Safe Routes to Schools program. Furthermore, it is not known if this pathway can be constructed, or if grant money would be available. Therefore, implementation of Mitigation Measures TRANS-5b and TRANS-5c is not assured, and Impact TRANS-5 would be significant and unavoidable. (SU)

Facts: The relevant facts are set forth in Chapter 4.12 of the EIR.

Findings:

(1) To mitigate impacts concerning conflicts with policies encouraging use of alternative transportation, the EIR recommends that the District increase the capacity of on-campus bicycle parking facilities. This mitigation measure has been adopted as stated in the approval resolution.

(2) To mitigate impacts concerning conflicts with policies encouraging use of alternative transportation, the EIR recommends that San Rafael City Schools shall work with the City of San Rafael and Safe Routes to School, as feasible, in efforts to obtain a grant to conduct a study on the feasibility of implementing a new bicycle and pedestrian pathway to serve the SRHS campus. This mitigation measure has been adopted as stated in the approval resolution.

(3) To mitigate impacts concerning conflicts with policies encouraging use of alternative transportation, the EIR recommends that San Rafael City Schools enroll and actively participate in Marin County's Safe Routes to School program, and host related educational programs. This mitigation measure has been adopted as stated in the approval resolution.

(4) The EIR's discussion and analysis is incorporated herein. Based on the whole record, the Board finds that:

a. A funding source for the recommended bicycle and pedestrian pathway study, as well as the design and construction, is unknown. A new bicycle and pedestrian pathway is under the jurisdiction of the City of San Rafael, and therefore implementing a new pathway would require approval of and implementation by the City. Therefore, implementation of the recommended measure cannot be assured. For these reasons, the project's impact on traffic described above cannot be mitigated to a less than significant level. (SU)

(5) This impact is overridden by project benefits as set forth in the Statement of Overriding Considerations.

Rationale:

The EIR's discussion and analysis is incorporated herein.

It is unknown at this time whether outside grant funds could be located or made available for the feasibility study. If a grant or available funding source was identified, off-site bicycle and pedestrian circulation and improvements are under City jurisdiction and require City approval and implementation. While the design and construction of the proposed pathway (if feasible) is not included in the Master Facilities Long-Range Plan, the District plans to work with the City of San Rafael to coordinate its implementation to coincide with the completion of the Master Facilities Long-Range Plan. Currently, no funding sources have been identified for the construction of this pathway. The District will work with the City, but the District is unable to assure implementation.

As part of the Project, the District would increase on-campus bicycle parking facilities to safely and securely accommodate up to 100 bicycles in accordance with Mitigation Measure 5-a. Currently 3 to 4 percent of students travel to and from school by bicycle, and the proposed bicycle facilities would adequately accommodate the demand for bicycle parking. The Stadium Project (which is part of the Master Facilities Long Range Plan), itself, includes the addition of eight new bicycle racks.

The District would enroll and actively participate in Marin County's Safe Routes to School program and host educational programs about safe routes to school in accordance with Mitigation Measure TRANS-5c. The District will also work with the Marin County Safe Routes to School program to identify potential incentives that could be used to encourage both students and faculty to embrace more sustainable modes of travel such as walking, bicycle, transit, and carpooling as a means of traveling to and from school. The District also plans to work with the Safe Routes to School program and the City to schedule a walking and bicycling audit along streets surrounding the SRHS campus. The purpose of the audit would be to identify safety concerns that hinder student travel to and from school by walking and bicycling. The

District plans to work with the City to conduct bi-annual student travel surveys that would identify the number of students traveling to and from school by bicycle. Each year, the District would review the share of students traveling by bicycle against the bicycle parking inventory and provide additional bicycle parking on-campus as necessary.

Mitigation Measure TRANS-5 is not a stand-alone mitigation measure. The District would work with the City and Safe Routes to School, as feasible, to implement TRANS-5 with Mitigation Measures TRANS-1 through TRANS-7, as feasible, which would reduce impacts concerning conflicts with policies encouraging use of alternative transportation.

D.4. Cumulative Impacts Analyzed in the Draft EIR.

CEQA Guidelines state that an EIR shall discuss cumulative impacts of a project when its incremental effect is cumulatively considerable (CEQA Guidelines section 15355(b)). A cumulative impact from several projects is a change in the environment that results from the incremental impact of a project when added to other related projects.

According to CEQA Guidelines Section 15130(b)(1) an adequate discussion of cumulative impacts should be based on either 1) a list of relevant past, present and reasonably anticipated future projects that would produce related or cumulative impacts or 2) a summary of projections contained in a General Plan.

Facts:

The EIR assembled and analyzed the potential cumulative environmental impacts, if any, of the Project. The cumulative analyses found in Chapter 4 and Chapter 6 of the Draft EIR identified no significant cumulative impacts.

Findings:

The EIR's discussion and analysis is incorporated herein. Based on the entire record, the Board finds that, by undertaking the EIR, the District analyzed reasonably anticipated future projects that may produce related or cumulative impacts, which will be lessened to less-than-significant levels.

E. ALTERNATIVES TO THE PROJECT.

The EIR's discussion and analysis is incorporated herein.

The California Environmental Quality Act (CEQA) requires discussion of a reasonable range of project alternatives that could feasibly attain the project's objectives (CEQA Guidelines section 15126.6(a). An EIR must evaluate a reasonable range of alternatives to the project or to the location of the project that: (1) offers substantial environmental advantages over the proposed project; and (2) may be feasibly accomplished in a successful manner and within a reasonable period of time considering the economic, environmental, legal, social and technological factors involved.

The selection of alternatives for analysis is described in Chapter 5 of the Draft EIR. Each alternative to the proposed project was evaluated for its ability to reduce or eliminate impacts. Two alternatives are evaluated in this section:

- Alternative 1: No Project Alternative

- Alternative 2: Relocated Madrone High Continuation School Alternative

The purpose in analyzing alternatives to a proposed project is to determine if an alternative is capable of eliminating or reducing potential significant adverse environmental effects, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly" (CEQA Guidelines section 15126.6[b]). The following discussion sets forth the District's evaluation of each of the alternatives to determine whether there are feasible alternatives to the proposed action (CEQA Guidelines section 15126.6[b]) and whether the alternative can eliminate or substantially lessen significant impacts previously described in the document for the proposed action. A discussion of those alternatives eliminated from further consideration is also provided.

One additional Project Alternative also considered and rejected, as discussed in the EIR at Chapter 5:

- Off-Site Alternative

E.1. Selection of Alternatives to be Considered in the EIR.

The selection of alternatives for analysis is described in Chapter 5 of the Draft EIR. Each alternative to the proposed project was evaluated for its ability to reduce or eliminate impacts. The following discussion set forth provides the District's evaluation of each of the alternatives to determine whether there are feasible alternatives to the proposed action (CEQA Guidelines section 15126.6[b]) and whether the alternative can eliminate or substantially lessen significant impacts previously described in the document for the proposed action.

E.2. Analysis of Impacts and Findings Regarding Alternatives.

Alternative 1: No Project

Alternative 1, the No Project Alternative, would leave the SRHS campus unchanged. No improvements would be made to the campus, including improvements for drainage, access, and parking. With the campus left unchanged under this alternative, there would be fewer conditions related to traffic, noise, or other topics for the immediate neighbors of the campus. However, some increased traffic (and related noise) may occur due to the increased enrollment that may happen even if no new buildings were constructed. The No Project Alternative would also not result in increased energy savings, or improved lighting and noise measures proposed by the Stadium Project.

However, the No Project Alternative would not meet any of the objectives of the proposed project.

Alternative 2: Redesigned Project with New Driveway Access Alternative

Alternative 2 would include relocation of the Madrone High Continuation School to the northwest corner of the SRHS campus as shown in Figure 5-1, with access that portion of the campus from Union Street. This new building would replace the building currently used by Head Start which would have to be relocated to a location not yet known. Currently, Head Start has about 50 students and 5 staff. The warehouse on this corner

would be relocated to the south of Madrone High and rebuilt as shown in Figure 5-1 in the EIR. Both new buildings would be one story in height. New parking would be provided between the warehouse and Madrone High. This alternative would also remove the proposed demolition of the existing Science building (Building F) and construction of the proposed new Science building (Building No. 1) from the Master Facilities Long-Range Plan. Instead, the existing Science building (Building F) would remain as is. Otherwise, the campus development would be similar to that proposed by the Master Facilities Long-Range Plan. The on-site student population would remain unchanged with a gain of about 200 students over the planning period. There would be no change in existing faculty or staffing levels.

The environmental benefit of this alternative would be that a two-story building (Building No. 1) would not be constructed across from an existing residential area to replace the existing one-story building (Building F), and students for Madrone would now enter the campus from Union Street, thus reducing congestion on Mission Avenue and the 3rd Street entrance to the campus. Also, with the relocation of the Head Start program, there would be less overall traffic in this vicinity.

Impacts

The individual environmental topics are addressed below. The analysis and the discussion in the EIR is incorporated herein.

Aesthetics

This alternative would have similar visual issues to the proposed project. However, the existing one-story Science Building (Building F) on Mission Avenue would remain as is and would not be demolished and replaced with the proposed new two-story Science building (Building No. 1). With the new Madrone High building at the corner of Mission Avenue and Union Street, there would be a building closer to the street as compared to the existing building, but the new building would be one story and would not have significant impacts compared to the existing Head Start building. The proposed new warehouse building would be one story also and would be across from a proposed parking area on this portion of the campus, but would not result in significant impacts.

Air Quality

Alternative 2 would generate similar criteria air pollutant emissions from vehicles to those of the Master Facilities Long-Range Plan; however, the potential impact on regional air quality would remain less than significant (i.e., the same as the impact of the Master Facilities Long-Range Plan). Similar to the Master Facilities Long-Range Plan, construction activities for Alternative 2 would result in potentially significant impacts related to the generation of dust, criteria pollutants, and toxic air contaminants that could be reduced to a less-than-significant level with implementation of Mitigation Measures AIR-1 through AIR-3. Therefore, Alternative 2 would have essentially the same significant impacts as the Master Facilities Long-Range Plan.

Biological Resources

Impacts on biological resources would be similar to those of the Master Facilities Long-Range Plan, and there would be no new significant impacts under this alternative. The relocation site for Madrone High has been developed previously, and includes some trees at the periphery of the site that may be removed. There remains a potential for disturbance to nesting birds, and tree removal would be required under this alternative. Mitigation Measure BIO-1 would still apply. Controls to protect trees to be preserved and replacement

landscaping that would include numerous tree plantings would serve to ensure that there are no major conflicts with the City's General Plan and Municipal Code.

Cultural Resources

Impacts on archaeological, paleontological, and historic resources would be comparable to those of the proposed Master Facilities Long-Range Plan because ground-disturbing activities (including the new Madrone site) have the potential to unearth these resources. Potential impacts in the vicinity of Building A would be similar to those proposed by the Master Facilities Long-Range Plan.

Geology and Soils

Alternative 2 would result in similar geology and soils impacts as the proposed Master Facilities Long-Range Plan after mitigation. The impacts identified for the Master Facilities Long-Range Plan would still apply to development under this alternative. However, Mitigation Measures GEO-1 through GEO-6, ensuring new development adheres to geotechnical requirements of the Field Act and related building codes, would also reduce potential impacts of Alternative 2 to a less-than significant level; thus, this alternative would not have any additional significant impacts compared to the Master Facilities Long-Range Plan.

Greenhouse Gas Emissions

Alternative 2 would generate similar greenhouse pollutant emissions from vehicles to those of the Master Facilities Long-Range Plan, because operations would result in a similar student and staff population; however, with 50 fewer students at the Head Start site, and up to 5 fewer staff, the generation of greenhouse pollutant emissions would be slightly reduced. The potential impact on regional air quality would remain less than significant (i.e., the same as for the Master Facilities Long-Range Plan). Therefore, the Master Facilities Long-Range Plan would not result in any additional significant impacts compared to Alternative 2.

Hazards and Hazardous Materials

Alternative 2 would result in similar hazards and hazardous materials impacts as the proposed Master Facilities Long-Range Plan after mitigation. Although the new two-story Science Building (Building No. 1) would not be constructed to replace the existing one-story Science Building (Building F), resulting in a reduction of project size, the impacts identified for the Master Facilities Long-Range Plan would apply to development under this alternative. However, Mitigation Measures HAZARDS-1 and HAZARDS-2, ensuring construction complies with the DTSC School Property Evaluation and Cleanup Program, would also reduce potential hazards and hazardous materials impacts of Alternative 2 to a less-than-significant level; therefore, this alternative would not have any additional significant impacts compared to the Master Facilities Long-Range Plan. No significant hazards impacts would be associated with the relocation of Madrone High to the corner of Mission Avenue and Union Street.

Hydrology and Water Quality

Alternative 2 would result in similar hydrology and water quality impacts as the proposed Master Facilities Long-Range Plan. Although the new two-story Science Building (Building No. 1) would not be constructed to replace the existing one-story Science Building (Building F) and two new buildings would be constructed at the corner of Mission Avenue and Union Street, the impacts identified for the Master Facilities Long-Range Plan would apply to

development under this alternative. However, no potentially significant impacts related to hydrology and water quality were identified for the proposed Master Facilities Long-Range Plan. Existing regulatory requirements, including preparation and implementation of a Storm Water Pollution Prevention Plan during construction, project design incorporating stormwater treatment and flow control, and preparation and implementation of a Stormwater Control Plan during operation, would also reduce potential significant impacts of this alternative to a less-than-significant level.

Land Use and Planning

The land use and planning impacts of Alternative 2 would be similar to those of the proposed Master Facilities Long-Range Plan, and there would be no significant impacts that would require mitigation. However, with respect to the SRHS campus project site, Alternative 2 may result in a project even more compliant with City of San Rafael Policy NH-2 regarding sensitivity of the scale of new development near residential areas. The new Madrone High building and the warehouse would be one story in height; and Building F would remain one story.

Noise

Alternative 2 would result in similar noise and vibration impacts as the proposed Master Facilities Long-Range Plan after mitigation. The type and number of heating, ventilation, and air conditioning (HVAC) systems installed under Alternative 2 at the SRHS campus would be similar to the Master Facilities Long-Range Plan; therefore, the operational noise generated would also be similar. It is assumed that operational noise impacts associated with 75 Madrone students would not be significantly different from the 50 Head Start students on the northwest corner of the SRHS campus. The implementation of Mitigation Measure NOISE-1 would reduce the potential impacts of HVAC system noise on receptors surrounding the SRHS campus to a less-than-significant level.

The Stadium Project under Alternative 2 would be the same as the Stadium Project under the Master Facilities Long-Range Plan; therefore, the periodic noise generated would also be the same. The implementation of Mitigation Measure NOISE-2 would reduce the potential for the public address (PA) system to be installed improperly under Alternative 2 to a less-than-significant level.

The potential construction noise impacts under Alterative 2 would be slightly reduced in the main campus area relative to the Master Facilities Long-Range Plan because the existing Science building (Building F) would not be demolished, and a new Science building (Building No. 1) would not be constructed. However, some construction noise would occur at the corner of Mission Avenue and Union Street with construction of the new Madrone High building and the new warehouse building. Construction and demolition activities on the SRHS campus under Alternative 2 would still occur in close proximity to both on-campus and off-site receptors. The implementation of Mitigation Measures NOISE-3a through 3d and NOISE-4 would reduce the potential impacts of construction-generated noise and vibration on surrounding receptors to a less-than-significant level. Traffic-related noise levels would be similar to the proposed project, though a minor amount of traffic noise would be shifted to Union Street by the relocation of Madrone High.

Through the implementation of the mitigation measures developed for the Master Facilities Long-Range Plan, all of the potential impacts of noise and vibration generated by construction and operation of the facilities proposed under Alternative 2 on the SRHS campus would be less than significant. Therefore, with mitigation, the potential noise and

vibration impacts under Alternative 2 would be similar to the potential noise and vibration impacts under the proposed Master Facilities Long-Range Plan.

Public Services

Impacts of Alternative 2 would be comparable to those of the Master Facilities Long-Range Plan because this alternative would not create a need for new or physically altered fire stations or police facilities. Since the Madrone High Continuation School relocation site has already been developed, it would be unlikely to create any facilities needs in its new location.

Transportation/Traffic

The transportation and traffic impacts of Alternative 2 would be similar to but less than those of the proposed Master Facilities Long-Range Plan. With Alternative 2, overall traffic generated by campus activities would be similar to the proposed project except that there would be 50 fewer Head Start students being dropped off and picked up at the northwest corner of the SRHS campus. One benefit would be that this alternative moves the access to Madrone High to Union Street, thus alleviating some of the traffic for the Mission Avenue corridor near the campus, and for the 3rd Street entrance.

While the overall transportation and traffic impacts of Alternative 2 would be slightly reduced compared to those of the proposed Master Facilities Long-Range Plan, all mitigation measures recommended for the proposed Master Facilities Long-Range Plan would still apply to Alternative 2.

Utilities and Service Systems

Impacts of this alternative would be comparable to those of the Master Facilities Long-Range Plan. Since the Madrone High Continuation School relocation site has already been developed, it would be unlikely to create any new water, wastewater, or solid waste service needs in its new location.

Energy

Impacts of Alternative 2 would be comparable to those of the Master Facilities Long-Range Plan because the alternative (1) would not result in a substantial increase in overall or per capita energy consumption or in the wasteful or unnecessary consumption of energy, (2) would not require or result in the construction of new sources of energy supplies or additional energy infrastructure capacity, and (3) would not conflict with applicable energy efficiency policies or standards.

Recreation

Impacts of Alternative 2 would be similar to those of the Master Facilities Long-Range Plan because this alternative would not increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated, or such that new or altered facilities would be needed.

Relationship to Project Objectives

Alternative 2 would meet all of the project objectives as listed at the beginning of this chapter except the following:

- Modernize classrooms, laboratories, and libraries to meet contemporary standards of education to ensure all students are well prepared for success in the 21st century;

- Address increasing enrollment while providing students and faculty with a learning environment that reflects the District's strategic plan for the future;

- Meet the intent of the Master Facilities Plan that was approved by the District's Board on July 27, 2015, and phase projects under the SRHS Master Facilities Long-Range Plan.

This alternative would provide capacity for up to 1,325 students but Building F would not be rebuilt and thus could possibly not allow the campus to create the full learning environment envisioned by the Master Facilities Long-Range Plan. Because the proposed new Science Building (Building No. 1) under the project would not be constructed as part of the alternative, and the existing Science Building (Building F) would remain, the alternative would not fully meet project objectives concerning modernization of classrooms and laboratories to meet contemporary standards of education, and upgrading of buildings for fire safety, energy conservation, seismic safety, ADA compliance, and campus security. And this alternative would not fully meet the intent of the original Master Facilities Plan because Building F would not be replaced with a new science building.

Findings:

1) *Based on the whole record, this Board finds that the Project Alternatives referenced herein would result in fewer environmental impacts than the Project in some instances and similar environmental impacts to the Project in other instances. However, both of these Alternatives fail to achieve all of the major objectives of the Project. Therefore, the Board further finds that these Project Alternatives are infeasible.*

2) *Based on the whole record, the Board further rejects the Project Alternatives, as respectively identified, for the following reasons:*

    - *The No Project Alternative would not meet any of the Project Objectives identified in section B.1 above.*
    - *The Project would meet the intent of the District's Facilities Master Plan and further the goals set forth in the District's Facilities Master Plan, and phase projects under the SRHS Master Facilities Long Range Plan. The No Project Alternative would neither satisfy the intent of the Facilities Master Plan nor further any of the goals provided therein. Likewise, Project Alternative 1 would not fully meet the intent of the original Master Facilities Plan because Building F would not be replaced with a new science building.*
    - *The opportunity to upgrade and modernize existing facilities, construct new learning environments, and improve safety on the SRHS campus that will be provided by the Project would not be provided if the No Project Alternative was adopted. Likewise, the Project Alternative 1 would not meet the project objective regarding modernization of classrooms, laboratories, and libraries to meet contemporary standards of education because the proposed new Science Building would not be constructed under Project Alternative 1, and the existing Science Building would remain.*

- *The Project provides capacity for up to 1,325 students and preserves land area on the SRHS campus to enable future flexibility and facility growth if student enrollment dictated a need for increased classrooms and facilities. If adopted, Project Alternative 1 would provide capacity for up to 1,325 students but, because Building F would not be demolished and replaced with Building 1, Project Alternative 1 could possibly not allow the campus to create the full learning environment envisioned by the Master Facilities Long-Range Plan. Further, Project Alternative 1 would not leave as much open space for future flexibility as would the proposed Project. Therefore, the Project would better meet the objective of addressing increasing enrollment while providing students and faculty with a learning environment that reflects the District's strategic plan for the future than would Project Alternative 1.*
- *If adopted, Project Alternative 1 would provide capacity for up to 1,325 students but, because Building F would not be demolished and replaced with Building 1, Project Alternative 1*
- *The additional school facilities provided by the Project will assist in accommodating increased student enrollment, which would not be provided if the No Project Alternative was adopted.*

3) *Based on the whole record, the Board finds that the Project Alternatives that were considered but rejected, as identified above and described in the EIR, are infeasible because they do not meet all of the major Project Objectives.*

F. STATEMENT OF OVERRIDING CONSIDERATIONS

This section addresses the requirements in CEQA Guidelines Section 15093, which requires the lead agency to balance the benefits of a proposed project against its unavoidable significant impacts and to determine whether the impacts are acceptably overridden by the project benefits. As described in Section D.3 above, the Project would produce project specific unavoidable significant impacts in the study areas of Traffic.

The Board adopts and makes this statement of overriding considerations concerning the Project's unavoidable significant impacts to explain why the project's benefits override and outweigh its unavoidable impacts.

Findings:

1) *Based on the whole record, the Board finds that the Project's significant environmental impacts are acceptable in light of the Project's economic, legal, social, technological or other benefits. The Board finds that the previously stated major benefits and objectives of the Project as described herein and in the EIR outweigh the unavoidable significant adverse environmental impact noted herein. Each of the benefits of the Project is hereby determined to be, in itself and independently of the other project benefits, a basis for overriding all unavoidable environmental impacts identified in the EIR and in these Findings, despite each and every unavoidable impact.*

   - Facilities Master Plan: The Project meets the intent of the Facilities Master Plan, approved July 27, 2015, by furthering the following goals, among others*:*

- Creates a new space for administration staff that is closer to the SRHS campus entrance.

- Creating 21st century learning environments. Expands vertically to preserve important outdoor space.

- Updating and modernizing classrooms, laboratories, libraries and other school facilities to meet contemporary standards of education. Provides students and faculty with a learning environment that reflects the District's strategic plan for the future.

- Implements "green building" practices and includes energy efficiency measures.

- Modernizes technology at the campus and replaces outmoded teaching equipment.

- Provides an enhanced learning environment by providing a new stadium.

- Accommodates increased enrollment and addresses overcrowding. Provides permanent facilities for students currently housed in temporary buildings. New buildings would allow the campus to provide expanded programs and modernized facilities.

- Enrollment Growth: The Project addresses increasing enrollment within the District by creating facilities that have the capacity for both current and future projected student enrollment by accommodating a projected 200 student enrollment increase at the SRHS campus with new learning spaces, modernization of existing classrooms, and adequate and athletic facilities.

- Safety: The Project improves safety on the SRHS campus for students, staff, and the community by upgrading buildings for fire safety, energy conservation, ADA compliance, seismic safety, improved infrastructure, and campus security.

- Improved Facilities. The Project provides upgrades to the SRHS campus and improved and modernized facilities that benefit and serve the local population. Provides instructional and administrative space to meet program requirements. Improved disabled access. Provides permanent facilities for students in temporary buildings. Provides an upgraded sports stadium and enhanced learning environment for both physical education and after school sports. The Project further improves parking conditions on campus for staff and visitors.

- Environmental Considerations. The Project will incorporate environmental principles and "green building" practices into the Project design, such as energy conservation measures, energy efficiency, and new landscaping.

2) *The Board finds that the Findings set forth in the preceding sections have identified all of the adverse environmental impacts and the feasible mitigation measures which can reduce impacts to insignificant levels where feasible, or to the lowest feasible achievable levels where significant impacts remain. The*

findings incorporate the analysis of alternatives to the Project to determine whether they are reasonable or feasible alternatives to the proposed action or whether they might reduce or eliminate the significant impacts of the proposed action. The EIR presents evidence that implementing the Project will cause four significant adverse impacts, which cannot be substantially mitigated to a less than significant level. These significant impacts have been outlined above and the Board finds that all feasible alternatives and mitigation measures have been adopted or identified for implementation by the District or other responsible agencies.

3) *The Board finds that the Project's benefits are substantial and override the following unavoidable impacts of the Project:*

- Impact TRANS-2: The addition of project-generated vehicular traffic onto local roadways would increase traffic congestion, particularly on Mission Avenue due to increased drop-off and pick-up activities. This would deteriorate traffic flow along Mission Avenue, which lacks adequate loading and unloading zones. This would also present a safety hazard as it would increase potential conflicts between vehicular traffic and pedestrian and bicycle traffic. These impacts would conflict with the San Rafael General Plan Program C-4a (Street Pattern and Traffic Flow).

- Impact TRANS-3: The addition of project-generated vehicular traffic would increase average vehicular delay by more than 5 seconds at two intersections—Union Street/Mission Avenue, and San Rafael High School Driveway (West)/3rd Street—under near-term (year 2020) plus Master Facilities Long-Range Plan conditions, and at two intersections— Union Street/Mission Avenue and San Rafael High School Driveway (West)/3rd Street—under cumulative (year 2040) plus Master Facilities Long-Range Plan conditions. The additional average vehicular delay under near-term (year 2020) plus Master Facilities Long-Range Plan conditions would degrade intersection operating conditions from level of service (LOS) D to LOS F at one intersection. The additional average vehicular delay and degradation of level of service operations would represent a significant impact as defined by City of San Rafael significance thresholds.

- Impact TRANS-4: Implementation of the Master Facilities Long-Range Plan would increase the number of students walking and bicycling along key routes, including roadways and sidewalks, and across curb ramps and crosswalks. Many of the existing pedestrian and bicycle facilities serving the San Rafael High School campus do not adequately accommodate the existing levels of pedestrian traffic and would be further degraded with the addition of pedestrian and bicycle traffic generated by the Long-Range Plan. The increased traffic would decrease the overall performance and safety of these facilities.

- Impact TRANS-5: Implementation of the Master Facilities Long-Range Plan would increase the number of students bicycling along key routes, including roadways and sidewalks, and across crosswalks. Since none of these roadways are wide enough to include separated bicycle lanes, cyclists would be required to share vehicular travel lanes or ride along sidewalks. These conditions would discourage the use of alternative

modes of transportation and conflict with the San Rafael General Plan Policy C-11 (Alternative Transportation Mode Users).

4) *The Board finds that, as the CEQA lead agency for the proposed action, the District has reviewed the Project description in the EIR and fully understands the Project. Further, the Board finds that all potential adverse environmental impacts and all feasible mitigation measures to reduce these impacts have been identified in the EIR and public comments, and these mitigation measures are part of the Mitigation Monitoring and Reporting Program. These impacts and mitigation measures are discussed herein. The Board also finds that a reasonable range of alternatives was considered in the EIR and this document, and that no feasible alternatives that substantially lessen Project impacts that are significant and unavoidable are available for adoption that also meet the Project's Objectives.*

5) *The Board finds that the District has identified benefits and objectives which will result from implementing the proposed Project and that the District has balanced these benefits against the unavoidable significant adverse effect of the proposed Project.*

6) *The Board finds that the benefits identified herein override the unavoidable environmental effects in light of the substantial social and economic benefits that will accrue to the community from the Project.*