Initial Study

Terra Linda High School
Capital Improvements Project

Lead Agency:

San Rafael City Schools
310 Nova Albion Way
San Rafael, California 94903

Prepared by:

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August 2023

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ACRONYMS AND ABBREVIATIONS

ADA	Americans with Disabilities
afy	acre-feet per year
BAAQMD	Bay Area Air Quality Management District
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CIF	California Interscholastic Federation
CO_2	carbon dioxide
DPW	Department of Public Works
EIR	Environmental Impact Report
GHG	greenhouse gases
LGVSD	Las Gallinas Valley Sanitary District
LHMP	Local Hazard Mitigation Plan
MCE	Marin Clean Energy
MMWD	Marin Municipal Water District
MRZ	Mineral Resource Zone
NPDES	National Pollutant Discharge Elimination System
PG&E	Pacific Gas and Electric Company
PD	Planned Development
RWQCB	Regional Water Quality Control Board
SRA	State Responsibility Area
SRFD	San Rafael Fire Department
SRPD	San Rafael Police Department
SWPPP	Storm Water Pollution Prevention Plan
USFWS	US Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zones

1 PROJECT DESCRIPTION

1.1 Project Title

Terra Linda High School Capital Improvements Project

1.2 Lead Agency Name and Address

San Rafael City Schools
310 Nova Albion Way
San Rafael, California 94903

1.3 Contact Person, Email, and Phone Number

Timothy Ryan, Senior Director of Strategic Facility Planning
tryan@srcs.org | 415-492-3200

1.4 Overview of the Project

San Rafael City Schools (the District) is proposing to implement capital improvements at the Terra Linda High School campus to modernize and/or replace existing outdated and aging academic and physical education facilities and to improve access in compliance with the Americans with Disabilities Act (ADA). The proposed improvements would serve the existing student population. No increase in enrollment is proposed.

1.5 California Environmental Quality Act

The California Environmental Quality Act (CEQA) is intended to inform government decision-makers and the public about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage. CEQA applies to activities initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed capital improvements at Terra Linda High School constitute a "project" as defined by CEQA (California Public Resources Code Sections 21000 et. seq.) and the CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000 et seq.).

CEQA Guidelines Section 15367 states that a lead agency is "the public agency which has the principal responsibility for carrying out or approving a project." The District is the lead agency responsible for compliance with CEQA for the proposed Project and has determined that the proposed Project will require the preparation of an environmental impact report (EIR).

This Initial Study has been prepared to provide information describing the proposed Project and its potential environmental effects. It evaluates environmental factors included in CEQA Guidelines Appendix G, Environmental Checklist Form, and identifies the proposed Project's potentially significant environmental effects that will be further evaluated in the EIR. Environmental factors for which no significant adverse environmental impacts are expected to occur will not be carried forward for further analysis. Where impacts are determined to be significant, the EIR will identify mitigation measures. The EIR will also include an evaluation of alternatives to the proposed Project that would reduce or avoid significant environmental impacts, including a No Project Alternative.

1.6 Project Location and Setting

The Terra Linda High School campus (campus or Project site) is located within the governmental jurisdictional boundary of the City of San Rafael (City), in southeastern Marin County, California. The City is bordered on the west by the incorporated towns of San Anselmo and Ross, and on the south by the City of Larkspur and the unincorporated communities of Kentfield and Greenbrae. The eastern edge of the City is formed by the San Francisco and San Pablo Bays, and the City is bordered by the City of Novato to the north. Figure 1 shows the regional vicinity of the Project site.

The Project site, located at 320 Nova Albion Way, is in the northwestern area of the City of San Rafael. The Project site is bounded by Nova Albion Way to the north, the Miller Creek School District Office to the east, and single-family residences along Devon Drive to the south and west. The main entrance to the Project site is off Nova Albion Way. The Project site is approximately 0.9 miles west of US Route 101. Figure 2 shows the Project site location.

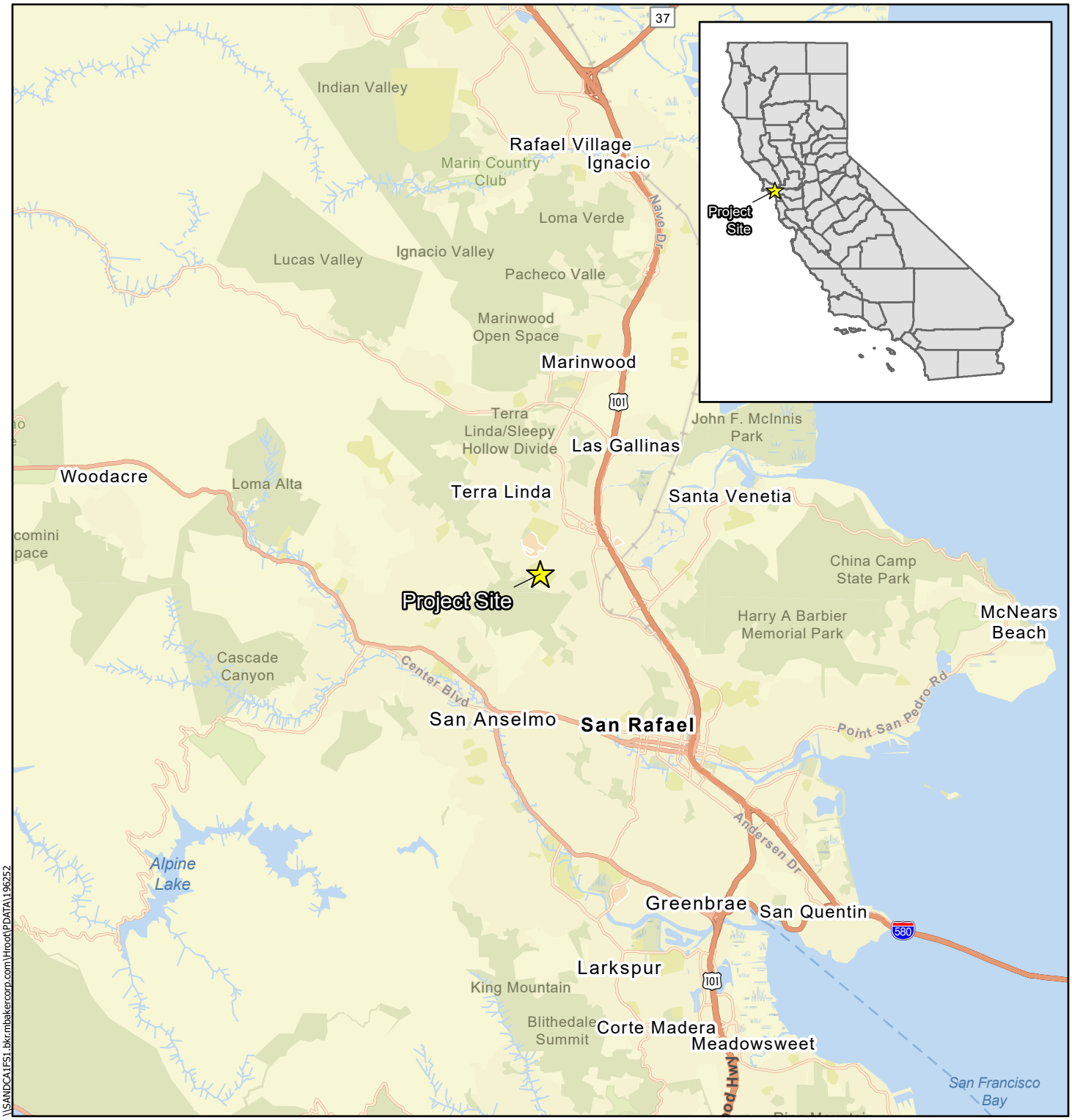
1.6.1 Existing Uses

Terra Linda High School was originally built in 1959. The campus consists of a 28-acre, irregularly shaped parcel, which is owned by the District. The northern portion contains the main classroom buildings, administration, competition gym, and small gym/locker rooms. The San Rafael City Schools District Office is located in the northwestern portion of the property; however, it is not a part of the Project site. The eastern and southeastern portions of the campus contain the stadium, track, and baseball and softball fields. The southern and southwestern portions of the campus contain soccer fields, tennis courts, and basketball courts. The western portion of the campus contains shop buildings, and the central portion of the campus contains the student commons and theater, and aquatic center with a swimming pool facility.

A summary of the existing facilities at the campus, including their size and year they were last modernized, is provided in Table 1. As shown, the District has continually maintained Terra Linda High School. In addition to the schedule shown below, the District has approved the following improvements to be implemented in 2023 and 2024. In 2023, the District will be and/or has been repairing and repaving the parking lot in the northeast corner of the campus, coating the rooftops of the shop buildings, installing a new shade structure at the career and technical education (CTE) facility, resurfacing the tennis courts, and constructing a ceramics, kiln, and glazing studio. The District has also approved new solar arrays that will be installed throughout the campus during the summer of 2024.

Table 1: Existing Facilities

Facility Use	Size	Year of Modernization
Administration	7,175 square feet	2019
Main Classroom Building	97,511 square feet	2002-2009
Commons (Student Support, Cafeteria, and Library)	32,971 square feet	2019
Theater	9,648 square feet	2006
Shop Buildings (Auto, Wood, Ceramics, and Applied Technology)	11,077 square feet	2021
Competition Gymnasium	24,343 square feet	2022
Weight Room / Dance Studio Building	9,469 square feet	2006
Swimming Pool	25 yards x 25 meters	2006
Practice Gymnasium	21,218 square feet	2019
Stadium / Track	157,889 square feet	2018
Basketball Courts	36,403 square feet	2006
Surface Parking	250 stalls	2019, 2022, 2023



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Legend

★ Project Site

Michael Baker INTERNATIONAL

0 1 2 Miles

Source: Esri, Michael Baker Intl, County of Marin, USGS, Caltrans.

TERRA LINDA HIGH SCHOOL
CAPITAL IMPROVEMENTS PROJECT

Regional Vicinity Map

Figure 1

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Legend

- Terra Linda High School Campus Boundary
- District Office (Not Part of Project Site)

Michael Baker INTERNATIONAL

0 150 300 US Feet

Source: Esri, Michael Baker Intl, County of Marin.

TERRA LINDA HIGH SCHOOL
CAPITAL IMPROVEMENTS PROJECT

Project Location Map

Figure 2

1.6.2 Surrounding Land Uses

Residential uses surround the campus to the north, south, and west. The uses are predominantly single-family homes. The Miller Creek School District Office is located adjacent and to the east of the campus, and the San Rafael City Schools District Office is located in the northwest portion of the campus; however, it is not included as part of the Project site. In the greater vicinity of the campus, Kaiser Permanente San Rafael Medical Center is located approximately 1,980 feet to the north of the campus and multifamily housing and a shopping center are located approximately 1,690 feet to the northwest. The campus is also near parks and open space, including Hartzell Park, approximately 2,220 feet to the east, and Sorich Park, approximately 1,380 feet to the south.

1.6.3 Land Use and Zoning

The Project site has a City of San Rafael 2040 General Plan land use designation of Public/Quasi-Public, which includes public schools as an allowed land use type.[1] The Project site is zoned Planned Development (PD) District.[2] The purpose of the PD District is to promote and encourage cluster development on large sites to avoid sensitive areas of property; encourage innovative design on large sites by allowing flexibility in property development standards; and accommodate various types of large-scale, complex, mixed-use, phased developments.[3] School uses are permitted in the PD District except in accord with a valid development plan. A development plan is not required for existing school sites located in the PD District.[4]

1.7 Proposed Project

Facilities at the campus were originally constructed in 1959, with improvements implemented in the 1960s and early 2000s. Improvements are needed to modernize and/or replace existing academic and physical education facilities at the campus to serve the existing student population and to improve access in compliance with the ADA. Additionally, the existing swimming pool no longer meets the standards for competition pools. As such, the existing pool facilities would be removed and replaced with a new competition-level aquatics center to support the existing water sports programs.

The proposed Project would be implemented in three phases, as follows (refer to Figure 3, Conceptual Site Plan):

Phase 1

- **Rehabilitation of Aquatics Center.** The existing outdoor swimming pool facilities (including the 25-meter by 25-yard pool) would be demolished, and a new competition-level aquatics center (with a 25-meter by 40-yard pool) would be constructed to support the existing swimming and water polo programs. The facility would meet California Interscholastic Federation (CIF) standards, which would allow the school to host CIF-level competitions. The existing pool lights would be replaced with new low-level MUSCO lighting on 50-foot poles. The existing pool deck would be removed and replaced with a

1 City of San Rafael, San Rafael General Plan 2040 Land Use Map, 2021.
2 City of San Rafael, Zoning Finder, accessed August 1, 2023, https://san-rafael.maps.arcgis.com/apps/View/index.html?appid=f9a6eba03a8d44f5919bfef783f056c2.
3 San Rafael Municipal Code, Section 14.07.010.
4 Pursuant to California Government Code Section 53094 et seq., the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable. It is anticipated that the District's Board of Education will exempt the proposed Project and campus from any zoning ordinances or regulations of the City of San Rafael, including, without limitation, the City's Municipal Code, General Plan, and related ordinances and regulations that otherwise would be applicable.

larger one. A new scoreboard and LED display would be installed at the perimeter of the pool. A new concrete 5- to 6-level bleacher with a cantilever shade structure would be installed on the south side of the aquatic facility; the bleachers would require the installation of a retaining wall. The existing ancillary gym building and pump room would be demolished and replaced with an ancillary gym building and pool house. Additionally, a new pump house building would be constructed. New lockers as well as restroom facilities would be a part of the ancillary gym building to better serve the pool.

- **Modernization of Physical Education Support Spaces.** The existing locker rooms, bathrooms, team rooms, and other support spaces in the gym building would be modernized. The spaces, including the bathrooms and lockers, would be reconfigured to add a new team room and an all-gender locker room. There would be new lighting, painting, finishes, and fixtures. The exterior doors would be replaced, as would mechanical equipment. The roof would either be coated or replaced, and the existing natural gas lines servicing the building would be upsized and rerouted. Mechanical equipment serving these spaces may also be replaced.

Phase 2

- **Modernization of Main Classroom Buildings.** The interior of the main school buildings, including classrooms, labs, restrooms, and corridors, would be modernized to be more resilient to physical damage and compliance with ADA standards. The facilities would be improved with new LED lighting, flooring, counters, fixtures, painting and finishes, and technology. The restroom toilets would be improved to high-security, full-height partitions. The fire alarm system would be upgraded. Room configurations at select areas would be changed to better serve more modern functions; as an example, existing book storage rooms would be converted into a wellness center.

Phase 3

- **Stadium Upgrades.** A new concessions and restroom facility would be constructed between the stadium and gymnasium, as would a new ticket booth building. The existing scoreboard would be replaced, and the track surface would be replaced with an in-kind rubberized surface. ADA-compliant paths of travel would be provided, and two existing portable structures (each approximately 1,000 square feet) would be removed. Existing flatwork, fencing, grades, landscaping, and site lighting between the practice gym and the track would also be improved as part of the stadium upgrades. One fire hydrant would need to be relocated slightly. The existing concession stand, a 40-foot converted storage container, would be removed.

- **New Artificial Turf at Baseball and Softball Fields.** Approximately 200,000 square feet of natural turf would be replaced with artificial turf. No “crumb rubber” materials would be present in the synthetic turf. The new fields may include other improvements, including dugouts, shot put throw station, irrigation line upgrades to adjacent landscaping, new scoreboards, and improved ADA-compliant paths of travel. No lighting is proposed for the ballfields as part of the proposed Project.

- **Tennis Court Improvements.** The existing tennis courts would be replaced, walkways would be improved to meet ADA standards, and the drinking fountain would be replaced with a new ADA-compliant fountain. The existing fencing around the tennis courts would be replaced. No lighting is proposed for the tennis courts as part of the proposed Project.

Implementation of the proposed Project would not require off-site improvements. The new facilities would tie into existing underground utilities located within the campus. It is assumed new impermeable surfaces, including artificial turf fields, would be designed to capture increased runoff.

The Project would comply with the California Building Standards Code (Title 24, California Code of Regulations [CCR]) and include sustainability improvements as required by the California Green Building Standards Code (CCR Part 11, Title 24), such as water conservation features (e.g., low-flow, water-efficient plumbing fixtures for toilets and sinks, tankless water heater systems, drought-tolerant plants and low-water irrigation systems with smart sensor controls). Improvements to the aquatic center, tennis courts, turf fields, and ADA-compliant paths of travel may require the removal of existing trees.

The proposed Project would not increase the student seating capacity of the campus. However, the proposed competitive-level aquatic center and the proposed artificial turf at the ballfields would allow extended use of the facilities by the high school and community through the Civic Center Act. Expanded activity may include CIF tournaments at the aquatic center, early morning water polo and swim team practices, and expanded use of the ballfields.

The Project would be phased to limit interruptions to existing campus operations and to avoid the need for temporary student classroom facilities during construction. Additionally, construction activities would be scheduled to minimize disruptions to campus programs and important testing days. It is assumed the aquatics programs would be temporarily relocated off-site for one season to a community facility during construction of the new facility. The approximate schedule of construction activities for each phase is as follows:

- Phase 1: June 2024–August 2025
- Phase 2: June 2026–December 2028
- Phase 3: June 2029–December 2029

1.8 Agency Actions

It is the intent of this document and the forthcoming EIR to disclose the environmental effects of the Project in order to facilitate the understanding of the Project's potentially significant environmental effects by the District Board of Education, as the decision-making body of the CEQA lead agency, prior to its consideration of the Project; by responsible agencies who may rely on the environmental document to issue permits and other authorizations; and by reviewing agencies and the public on the potential environmental consequences that may occur from the proposed Project.

Table 2: Agency Activities

Agency	Discretionary Action
Lead Agency	
San Rafael City Schools	Certification of the EIR and Project approval
Responsible Agency	
San Francisco Bay Regional Water Quality Control Board	Issuance of National Pollutant Discharge Elimination System Permit General Construction Permit and approval of Stormwater Pollution Prevention Plan
San Rafael Public Works Department	Approval of off-site improvements, if any, concerning circulation improvements, grading, and drainage
Reviewing Agency	
Division of the State Architect	Review of Project compliance with the California Building Standards Code for fire and life safety
San Rafael Fire Department	Review of Project site access, fire lane markings, pavers and entrances; fire hydrant location and distribution; fire flow
Bay Area Air Quality Management District (BAAQMD)	Review for adherence of BAAQMD CEQA Thresholds of Significance for Climate Impacts

Site Plan Diagram

EXISTING FACILITIES

Total Campus Area:	28 Acres
Outdoor Athletic:	621,103 SF
Parking:	250 stalls

PROPOSED IMPROVEMENTS

	Project Description
1	**Classroom & Campus Improvements:** • Main Building Modernization including LED Lighting, Flooring, Counters, Classroom Technology, Corridors, & Restroom Remodel
2	• Buildings K Modernization Building H Demolition & Replacement with New Facility • Security & Fire Alarm Systems Upgrades
3	**Aquatic Center with Competition Swimming & Water Polo**
4	**Site Work:** • Stadium Upgrades including Concessions, Restrooms, Ticket Booth, Portable Removal, & Track Surface, Sitework
5	• Artificial Turf Baseball & Softball Fields With Dugouts
6	• Tennis Court Replacement and Walkway Improvements

LEGEND:

- Existing Building
- Modernization
- New Building
- Not Part of Project Site
- Sport Facilities Improvements
- Asphalt Paving Improvements
- Courtyard Improvements
- New Artificial Turf

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Michael Baker INTERNATIONAL

NOT TO SCALE

Source: San Rafael City Schools, August 21, 2023.

TERRA LINDA HIGH SCHOOL
CAPITAL IMPROVEMENTS PROJECT

Conceptual Site Plan

Figure 3

2 ENVIRONMENTAL DETERMINATION

2.1 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

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

For the evaluation of potential impacts, the questions in the Initial Study Checklist are stated and an answer is provided according to the analysis undertaken as part of the Initial Study. The analysis considers the long-term, direct, indirect, and cumulative impacts of the project. To each question, there are four possible responses:

- **No Impact.** The project would not have any measurable impact on the environment.
- **Less Than Significant Impact**. The project would have the potential for impacting the environment, although this impact would be below established thresholds that are considered to be significant.
- **Less Than Significant Impact With Mitigation Incorporated**. The project would have the potential to generate impacts which may be considered a significant effect on the environment, although measures or changes to the development's physical or operational characteristics can reduce these impacts to levels that are less than significant.
- **Potentially Significant Impact**. The project would have impacts which are considered significant, and additional analysis is required to identify measures that could reduce these impacts to less than significant levels.

2.2 Environmental Determination

On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

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

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

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

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

Bob Marcucci _____ 8/29/23

Printed Name and Signature Date

3 INITIAL STUDY CHECKLIST

3.1 Aesthetics

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

Discussion

a) Except as provided in Public Resources Code Section 21099, would the project have a substantial adverse effect on a scenic vista?

No Impact. Scenic views or vistas are defined as panoramic public views of various natural features, including the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be from park lands, private and publicly owned sites, and public rights-of-way.

There are no officially designated scenic vistas in the City of San Rafael. However, the City identifies the following natural and built resources as visually significant, to the extent they are visible from public streets, parks, and public pathways: mountains and hillsides, including Mount Tamalpais, San Rafael Hill, San Pedro Ridge and Big Rock Ridge; San Pablo Bay and San Rafael Bay and Bay Wetlands; offshore islands; Mission San Rafael Arcangel; Marin Civic Center; and San Rafael Canal.[5] The proposed Project is not located near or within any of these natural and built resources, and thus, would not impact such resources. Therefore, no impact to scenic vistas would occur. This issue will not be further analyzed in the EIR.

b) Except as provided in Public Resources Code Section 21099, would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no eligible or designated state scenic highways near the Project site.[6] The closest state scenic highway is Route 37 (eligible), located approximately 5.6 miles to the north of the Project site. Therefore, no impact related to scenic resources within a state scenic highway

[5] City of San Rafael, San Rafael General Plan 2040 and Downtown Precise Plan EIR – Aesthetics, 2021.
[6] California Department of Transportation, California State Scenic Highway System Map, accessed July 24, 2023, https://www.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

would occur. This issue will not be further analyzed in the EIR.

c) Except as provided in Public Resources Code Section 21099, would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less Than Significant Impact. The Project site is located in an urbanized neighborhood. The Project site supports an existing and developed high school campus and is surrounded by residential uses, as well as the Miller Creek School District Office. The San Rafael City Schools District Office is located in the northwest portion of the campus; however, it is not a part of the Project site. The proposed Project would consist of phased improvements for the existing aquatics center, physical education spaces, classrooms, stadium, ballfields, and tennis courts.

The proposed Project would implement improvements to modernize and/or replace the school facilities and would not conflict with the existing zoning of the Planned Development District (PD), which allows for public school uses.[7] There are no other applicable regulations governing the scenic quality of the Project site. Nevertheless, all proposed improvements would be designed to be compatible with existing campus buildings and facilities and would continue to be maintained by the District. Therefore, impacts related to the Project's consistency with regulations governing scenic quality would be less than significant, and this issue will not be further analyzed in the EIR.

d) Except as provided in Public Resources Code Section 21099, would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Potentially Significant Impact. The proposed Project includes lighting improvements for the aquatics center (50-foot light poles), physical education spaces, and classrooms, some of which may result in spillover light at nearby light-sensitive uses (i.e., residential uses) and sky glow. In addition, implementation of the proposed Project would result in the extended use of the facilities by the high school and community in the early mornings and evenings. The design of the proposed lighting systems would include features (e.g., height, shields, and shades) that would limit upward light reflection and sky glow. Furthermore, due to improved technology, the new lighting systems would likely be an improvement from the existing lights relative to adverse glare and/or nighttime lighting effects. Nonetheless, given the campus's proximity to residential neighborhoods with light-sensitive uses, additional analysis of potential light and glare impacts will be included in the EIR. Impacts are considered to be potentially significant.

[7] Pursuant to California Government Code Section 53094 et seq., the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable. It is anticipated that the District's Board of Education will exempt the proposed Project and campus from any zoning ordinances or regulations of the City of San Rafael, including, without limitation, the City's Municipal Code, General Plan, and related ordinances and regulations that otherwise would be applicable.

3.2 Agriculture and Forestry Resources

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

Discussion

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

No Impact. The Project site currently supports the existing school campus; no agricultural uses are present on-site or in the surrounding area. Neither the Project site nor the surrounding area is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the "Important Farmland in California" map prepared by the California Natural Resources Agency pursuant to the Farmland Mapping and Monitoring Program.[8] Therefore, the proposed Project would not convert farmland to a non-agricultural use, and no impact would occur. This issue will not be further analyzed in the EIR.

[8] California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, California Important Farmland Finder, accessed July 24, 2023, https://maps.conservation.ca.gov/DLRP/CIFF/.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The proposed Project would be implemented within the boundaries of the existing campus, none of which is zoned for agricultural use. Additionally, there are no Williamson Act contracts within the City.[9] Therefore, the proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract, and no impact would occur. This issue will not be further analyzed in the EIR.

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. No portion of the Project site is zoned for forestland, timberland, or Timberland Production as defined in Public Resources Code Section 12220(g) and Government Code Section 4526. Therefore, the proposed Project would not conflict with existing zoning for or cause a rezoning of forestland or timberland. No impact would occur. This issue will not be further analyzed in the EIR.

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. No portion of the Project site is developed for forestland use or located adjacent to forestlands. Therefore, the proposed Project would not result in the loss of forestland or the conversion of forestland to non-forest use. No impact would occur. This issue will not be further analyzed in the EIR.

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed in response to checklist question 3.2(a) above, no portion of the Project site or surrounding area is identified as farmland or used for agricultural purposes. Additionally, as stated in response to checklist question 3.2(c), no portion of the campus or surrounding area is designated as forestland. Therefore, the proposed Project would not change the existing environment in a way that would result in the conversion of farmland to non-agricultural use or forestland to non-forest use, and no impact would occur. This issue will not be further analyzed in the EIR.

[9] California Department of Conservation, *Division of Land Resource Protection, The Williamson Act: 2020-2021 Status Report*, 2021, https://www.conservation.ca.gov/dlrp/wa/Documents/stats_reports/2020%20WA%20Status%20Report.pdf.

3.3 Air Quality

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

Discussion

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

Potentially Significant Impact. The Bay Area Air Quality Management District (BAAQMD) monitors air quality within the San Francisco Bay Area Air Basin, which includes the City of San Rafael and the Project site. The proposed Project would implement facility improvements at the campus, the construction of which would generate air quality emissions. Because the proposed Project would not increase the student enrollment capacity and would result instead in the extended use of the facilities by the high school and community, it is not anticipated to conflict with the BAAQMD's air quality management plan. An air quality assessment will be prepared to analyze the proposed Project's potential air quality impacts and consistency with the air quality management plan. Impacts are considered to be potentially significant, and additional analysis of this issue will be included in the EIR.

b) Would the project 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?

Potentially Significant Impact. Implementation of the proposed Project would generate air pollutants as a result of construction and operation-related activities. Short-term impacts may result from construction equipment emissions, such as from graders, dump trucks, worker vehicle exhaust, and fugitive dust during site preparation activities. Long-term operational impacts may result from the operation of new and/or modified facilities as well as from mobile (vehicle) emissions. A technical report evaluating air quality will be prepared for the proposed Project and will address the potential for cumulative air quality impacts. Impacts are considered to be potentially significant, and additional analysis of this issue will be included in the EIR.

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact. Some populations and land uses are considered more sensitive to air pollutants than others. The California Air Resources Board has identified the following groups who are most likely to be affected by air pollution: children less than 14 years of age, the elderly over 65 years of age, athletes, and people with cardiovascular and chronic respiratory diseases. Sensitive receptors may include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Some of these types of uses are located near the campus. The air quality technical report to be prepared for the proposed Project will evaluate the potential for sensitive receptors to be exposed to unhealthful pollutant concentrations as the result of Project implementation. Impacts are considered potentially significant. Additional analysis of this issue will be included in the EIR.

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

Less Than Significant Impact. Potential sources that may produce objectionable odors during construction activities include equipment exhaust, application of asphalt and architectural coatings, and other interior and exterior finishes. Although not anticipated, potential odors from these sources would be localized and generally confined to the immediate area surrounding the Project site. The proposed Project would be implemented utilizing standard construction techniques and odors would be typical of most construction sites, would be temporary in nature, and would not persist beyond the termination of construction activities. Construction impacts are therefore considered to be less than significant in this regard.

Additionally, nuisance odors are regulated under BAAQMD Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. Regulation 7 places general limitations on odorous substances and specific emission limitations on certain odorous compounds. Odors are also regulated under BAAQMD Regulation 1, Rule 1-301, Public Nuisance, which states:

> No person shall discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or the public; or which endangers the comfort, repose, health or safety of any such persons or the public, or which causes, or has a natural tendency to cause, injury or damage to business or property.

BAAQMD has established odor screening thresholds for land uses that have the potential to generate substantial odor complaints, including wastewater treatment plants, landfills or transfer stations, composting facilities, confined animal facilities, food manufacturing, and chemical plants.[10] The Project site does not currently contain these uses and none of these uses would be developed as part of the proposed Project. Therefore, no impact related to odors would occur during operations, and this issue will not be further analyzed in the EIR.

[10] Bay Area Air Quality Management District, California Environmental Quality Act Air Quality Guidelines, May 2017.

3.4 Biological Resources

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

Discussion

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

Potentially Significant Impact. Sensitive plants include those listed as threatened or endangered, proposed for listing, or candidate for listing by the US Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW) or those listed by the California Native Plant Society. Sensitive wildlife species are those species listed as threatened or endangered, proposed for listing, or candidate for listing by USFWS and/or CDFW, or considered special status by CDFW. Sensitive habitats are those that are regulated by USFWS and US Army Corps of Engineers, and/or those considered sensitive by CDFW.

The Project site is fully developed and vegetation on the site consists of grass-covered sports fields and ornamental landscape plantings throughout the site. Nonetheless, a biological

resources technical report will be prepared to evaluate potential impacts to sensitive and/or special-status species. Impacts are considered potentially significant, and further analysis will be included in the EIR.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The Project site is a fully developed high school campus within an urbanized neighborhood. No riparian or sensitive natural community occurs within the Project site or surrounding area.[11] Therefore, no impact to riparian or sensitive natural communities would occur with implementation of the proposed Project. This impact will not be further analyzed in the EIR.

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

No Impact. The Project site is a fully developed high school campus within an urbanized neighborhood. No wetland habitat occurs within the Project site.[12] The closest wetland habitat to the Project site is a riverine feature, approximately 0.45 miles to the south in Sorich Park. Therefore, no impact to riparian or sensitive natural communities would occur with implementation of the proposed Project. This impact will not be further analyzed in the EIR.

d) Would the project 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?

No Impact. In an urban context, a wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and vital resources, thereby encouraging population growth and diversity. The Project site is completely disturbed with a high school campus, surrounded by residential and school uses. The Project site is not a part of or adjacent to undisturbed habitat fragments, designated wildlife migration corridors, or vital resources. Therefore, the proposed Project would not interfere with the movement of wildlife. No impact would occur, and this issue will not be further considered in the EIR.

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

No Impact. The City of San Rafael has a tree protection ordinance (San Rafael Municipal Code Section 11.12.050) which requires that without a written permit, no cutting, pruning, breaking, injuring, removing, or spraying may be done to any living tree in, upon, or along any public street, sidewalk, or walkway in the City. The City's Public Works Department has supervision over all matters relating to trees planted on City streets, sidewalks, and walkways. The Project site is within District property and does not contain public streets, sidewalks, or walkways. The proposed Project also does not propose any improvements off-site. Therefore, no public trees protected under the City's ordinance would be impacted by the proposed Project. However, the District is

[11] US Fish and Wildlife Service, National Wetlands Inventory Mapper, accessed July 24, 2023, https://www.fws.gov/wetlands/data/mapper.html.

[12] US Fish and Wildlife Service, National Wetlands Inventory Mapper.

committed to taking the necessary measures to protect and preserve the on-site trees wherever possible. Therefore, no impact related to local policies or ordinances protecting biological resources would occur with implementation of the proposed Project.[13] This impact will not be further analyzed in the EIR.

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

No Impact. The County of Marin does not have a habitat conservation or natural community conservation plan.[14] Therefore, no impact related to conflict with such plans would occur with implementation of the proposed Project. This issue will not be further analyzed in the EIR.

[13] Pursuant to California Government Code Section 53094 et seq., the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable. It is anticipated that the District's Board of Education will exempt the proposed Project and campus from any zoning ordinances or regulations of the City of San Rafael, including, without limitation, the City's Municipal Code, General Plan, and related ordinances and regulations that otherwise would be applicable.

[14] California Department of Fish and Wildlife, California Natural Community Conservation Plans Map, 2019.

3.5 Cultural Resources

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

Discussion

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Potentially Significant Impact. A cultural resources technical report will be prepared for the proposed Project. The Project's potential impacts on historical resources will be further evaluated in the EIR.

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?

Potentially Significant Impact. The Project site is a fully developed and operating high school campus. As such, the presence of archaeological resources is unlikely. Nonetheless, the proposed Project would require ground-disturbing activities during construction, which may result in the disturbance of previously unknown archaeological resources. A cultural resources technical report will be prepared to assess the potential for impacts on archaeological resources that may be present at the Project site. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Potentially Significant Impact. The Project site is an existing developed high school campus and does not contain cemeteries or known human burial sites. However, although unlikely, ground-disturbing activities during construction may result in the disturbance of unknown human remains. A cultural resources technical report will be prepared to assess the potential for impacts on human remains that may be present at the Project site from ground-disturbing activities during construction. As impacts are considered potentially significant, additional analysis of this issue will be included in the EIR.

3.6 Energy

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

Discussion

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

Potentially Significant Impact. Sources of energy use associated with construction and operation of the proposed Project include electricity, natural gas, and transportation fuel for vehicle trips and off-road construction equipment. An analysis of energy consumption will be prepared for the proposed Project to assess energy consumption during short-term construction and long-term operational activities and to identify the potential for wasteful, inefficient, or unnecessary consumption of resources. Impacts are considered potentially significant. Additional analysis of this issue will be included in the EIR.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Potentially Significant Impact. Proposed improvements to the campus facilities would incorporate upgrades to existing facilities (lighting, water conservation features such as faucet aerators and high-efficiency toilets and urinals, etc.) in conformance with applicable codes and regulations pertaining to energy use and reduction. The energy analysis prepared for the proposed Project will evaluate the Project's consistency with applicable state and local energy plans relative to renewable energy and energy efficiency. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☒	☐	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☒	☐	☐	☐
iv) Landslides?	☒	☐	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☒	☐	☐	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☒	☐	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☒	☐	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☒	☐	☐	☐

Discussion

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

No Impact. The Project site is not located within a state-designated Alquist-Priolo Fault Hazard Zone.[15] The nearest Fault Hazard Zone is the Hayward Fault, located approximately 10 miles

[15] California Geological Survey, Earthquake Zones of Required Investigation Data Viewer, Search by Location, accessed July 21, 2023, https://maps.conservation.ca.gov/cgs/EQZApp/app/.

east of the Project site. No active faults are known to cross the Project site and surrounding vicinity. Therefore, the proposed Project would not directly or indirectly cause substantial adverse effects related to the rupture of a known earthquake fault. No impact would occur, and this issue will not be further addressed in the EIR.

ii. Strong seismic ground shaking?

Potentially Significant Impact. The Project site is located in a seismically active area in Northern California and is subject to strong seismic ground shaking. Additional discussion of the regional geologic setting, faults, and seismicity will be provided in the EIR.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact. According to the Department of Conservation's Earthquake Zones of Required Investigation, the Project site is not located within a liquefaction zone.[16] However, the City's General Plan identifies a majority of the Project site in an area with medium liquefaction susceptibility.[17] Impacts are considered potentially significant. Additional analysis of this issue will be included in the EIR.

iv. Landslides?

Potentially Significant Impact. According to the Department of Conservation's Earthquake Zones of Required Investigation, the Project site is not located within a landslide zone.[18] However, the City's General Plan classifies the southwest portion of the Project site as moderate to very high for landslide susceptibility.[19] Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

b) Would the project result in substantial soil erosion or the loss of topsoil?

Potentially Significant Impact. Construction of the proposed Project would include ground-disturbing activities, such as grading and excavation, which could result in the potential for erosion to occur at the Project site. Impacts are considered potentially significant. Additional analysis of this issue will be included in the EIR.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Potentially Significant Impact. The Project site is not identified as being susceptible to subsidence.[20] However, as discussed in response to checklist question 3.7(a)(iii) and (a)(iv), a majority of the Project site in an area with medium liquefaction susceptibility and the southwest portion of the site is classified as very high for landslide susceptibility.[21,22] Impacts are considered potentially significant. The EIR will provide additional discussion on soil conditions at the Project

16 California Geological Survey, Earthquake Zones of Required Investigation Data Viewer, Search by Location, accessed July 21, 2023, https://maps.conservation.ca.gov/cgs/EQZApp/app/.
17 City of San Rafael, General Plan 2040/EIR – Geology and Soils.
18 California Geological Survey, Earthquake Zones of Required Investigation Data Viewer, Search by Location, accessed July 21, 2023, https://maps.conservation.ca.gov/cgs/EQZApp/app/.
19 City of San Rafael, General Plan 2040/EIR – Geology and Soils.
20 City of San Rafael, General Plan 2040/EIR – Geology and Soils.
21 City of San Rafael, General Plan 2040/EIR – Geology and Soils.
22 City of San Rafael, General Plan 2040/EIR – Geology and Soils.

site, including risk for on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.

d) Would the project be located on expansive soil, creating substantial direct or indirect risks to life or property?

Potentially Significant Impact. Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. Expansive soils are known to occur at various locations throughout the campus. Therefore, impacts are considered potentially significant. The EIR will provide additional discussion on soil conditions at the Project site, including risks associated with expansive soils.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Terra Linda High School campus is served by existing sewer infrastructure operated by Las Gallinas Valley Sanitary District. No septic tanks or alternative wastewater disposal systems are included as part of the proposed Project. Therefore, no impact associated with the use of such systems would occur. This issue will not be further analyzed in the EIR.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Potentially Significant Impact. Some of the proposed improvements under the proposed Project would involve ground-disturbing activities during construction. An assessment of the potential for the Project to impact paleontological resources will be provided in the EIR. Impacts are considered potentially significant.

3.8 Greenhouse Gas Emissions

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

Discussion

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

Potentially Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. GHGs, such as carbon dioxide (CO_2), methane, and nitrous oxide, keep the average surface temperature of the earth close to 60 degrees Fahrenheit. GHGs also include hydrofluorocarbons, perfluorocarbons, sulfur hexafluoride, black carbon (the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion.

Temporary GHG emissions would be generated from use of off-road equipment and truck and worker vehicle trips during construction activities. During operations, the majority of permanent GHG emissions associated with land use development is typically related to vehicle trips and energy consumption. A GHG technical report will be prepared for the proposed Project, which will assess the GHG emissions associated with Project construction and operations. Impacts are considered potentially significant. Additional analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. As discussed in response to checklist question 3.8(a), the proposed Project would generate GHG emissions during construction and operations. The GHG technical report prepared for the proposed Project will evaluate the Project's compliance with applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions. Impacts are considered potentially significant. Additional analysis of this issue will be included in the EIR.

3.9 Hazards and Hazardous Materials

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

Discussion

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

Less Than Significant Impact. A material is considered hazardous if it appears on a list of hazardous materials prepared by a federal, state, or local agency or if it has characteristics defined as hazardous by such an agency. A hazardous material is defined by the California Health and Safety Code, Section 25501 as follows:

> A "Hazardous material" means any material that, because of its quantity, concentration, or physical or chemical characteristics, poses a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.
>
> "Hazardous materials" include, but are not limited to, hazardous substances, hazardous

> waste, and any material that a handler or the administering agency has a reasonable basis for believing that it would be injurious to the health and safety of persons or harmful to the environment if released into the workplace or the environment.

An extremely hazardous material is defined in Title 22, Section 66260.10, of the California Code of Regulations as follows:

> A substance or combination of substances which, if human exposure should occur, may likely result in death, disabling personal injury or serious illness caused by the substance or combination of substances because of its quantity, concentration or chemical characteristics.

The release of hazardous materials into the environment could potentially contaminate soils, surface water, and groundwater supplies.

The proposed Project would involve improvements to existing campus facilities. Construction activities would involve the temporary use, storage, and transport of hazardous materials typical of construction of buildings, such as asphalt, fuels, lubricants, paints, cleaners, and solvents. Incidental spills and leaks of such substances associated with routine use during construction represent a potential hazard to human health and the environment if not properly stored and handled. The District requires that all potentially hazardous materials used during construction to be handled and disposed of in accordance with manufacturers' specifications and instructions, thereby reducing the risk of hazardous materials use. In addition, the District would comply with existing federal, state, and local regulations related to the transport, use, management, and disposal of hazardous materials, including but not limited to the Resource Conservation and Recovery Act, California Hazardous Waste Control Law, federal and state Occupational Safety and Health Acts (OSHA), Department of Transportation, Department of Toxic Substances Control, San Francisco Bay Regional Water Quality Control Board (RWQCB), BAAQMD, and the Marin County Waste Management Division. The existing regulations are aimed at the amount of hazardous materials used, accident prevention, protection from exposure to specific chemicals, and the proper storage and disposal of hazardous materials. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

Additionally, the disposal of hazardous materials would occur in a manner consistent with applicable regulations and at an appropriate off-site disposal facility. Any proposed improvements that would disturb more than one acre of land would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP), which would include measures to minimize the release of hazardous materials from construction sites via stormwater runoff, in compliance with the latest National Pollutant Discharge Elimination System (NPDES) permit requirements for stormwater discharges.

Operation of some improvements implemented as part of the proposed Project would involve the routine use of hazardous materials such as cleaners and common chemicals used for swimming pool facilities, landscaping, and maintenance, similar to current operations. In general, schools do not generate significant amounts of hazardous materials, and only a necessary amount of common day-to-day materials is stored on-site. These materials would be used, stored, and disposed of in accordance with existing regulations and product labeling and would not create a significant hazard to the public or to the environment. Therefore, with compliance with manufacturer's standards and all applicable local, state, and federal laws and regulations relating to environmental protection and the management of hazardous materials, impacts associated

with the routine transport, use, or disposal of hazardous materials during construction and operation of the proposed Project would be less than significant. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. As discussed in response to checklist question 3.9(a), the District is required to comply with existing federal, state, and local regulations related to the transport, use, and disposal of hazardous materials. Disposal of hazardous materials undertaken as part of Project implementation would occur in a manner consistent with applicable regulations and at an appropriate off-site disposal facility. Additionally, any proposed improvements that would disturb more than one acre of land would be required to prepare an SWPPP to minimize the release of hazardous materials from construction sites via stormwater runoff, in compliance with the latest NPDES permit requirements for stormwater discharges.

Due to the age of some buildings on the campus, their demolition may expose lead-based paint (LBP) or asbestos-containing materials (ACM) into the environment. The District will survey for LBP and ASM prior to the demolition or renovation of any structures and removal of utility systems. In the event of the discovery of such materials, abatement would occur in accordance with federal and state requirements. Should LBP be found, suspect materials would be removed in accordance with procedural requirements and regulations for the proper removal and disposal of LBP prior to construction activities, including standard handling and disposal practices pursuant to OSHA regulations. Example procedural requirements include the use of respiratory protection devices while handling lead-containing materials, containment of materials containing lead on the proposed Project site or at locations where construction activities are performed, and certification of all consultants and contractors conducting activities involving LBP or lead hazards.

Similarly, in the event that ACMs are found on-site during construction, suspect materials would be removed by a certified asbestos abatement contractor in accordance with applicable regulations, including 40 Code of Federal Regulations Part 763 Subpart E, Asbestos-Containing Materials in Schools Rule and BAAQMD Regulation 11, Rule 2, Asbestos Demolition, Renovation and Manufacturing. In addition, development of the proposed Project would include the use of commercially sold construction materials without ACMs. With compliance with relevant regulations and requirements, the proposed Project's construction activities would not expose people to a substantial risk resulting from the release of asbestos fibers into the environment.

As discussed in response to checklist question 3.9(a), operation of the proposed Project would involve the routine use of hazardous materials, such as cleaners and common chemicals used for swimming pools, landscaping, and maintenance, similar to current operations. These materials would be used, stored, and disposed of in accordance with existing regulations and product labeling. Therefore, with compliance with existing regulations for the safe handling of hazardous materials, the proposed Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project site is an existing high school campus. The Miller Creek School District Office campus is located adjacent to and east of the Project site, and the San Rafael City Schools District Office is located in the northwest portion of the campus; however, it is not a part of the Project site. There are no other existing or proposed schools within a one-quarter mile radius of the Project site.

As discussed in response to checklist questions 3.9(a) and 3.9(b), the District is required to comply with existing federal, state, and local regulations related to the transport, use, handling, and disposal of hazardous materials during construction and operation of the Project. Additionally, all construction areas would be secured to limit student trespass. Hazardous materials would be appropriately stored and locked away, thus further limiting the exposure of hazardous materials to students on the campus. The District would coordinate with the construction contractor to schedule activities that would be least disruptive to school operations, such as during school breaks. Any activities requiring the abatement and removal of hazardous materials would be conducted when students are not present. The proposed Project's construction-related emissions could affect sensitive receptors, including students; this will be further addressed in the EIR, under checklist section 3.3c (i.e., whether the Project would expose sensitive receptors to substantial pollutant concentrations). If found to be potentially significant, mitigation to reduce construction-related emissions will be identified in the EIR. No other exposures of hazardous materials or emissions would occur during construction of the proposed Project.

As mentioned above, operation of the proposed Project would not be substantially different from the existing operations at the campus. The proposed use of hazardous materials, such as cleaners and common chemicals for landscaping and maintenance of the Project, including for the swimming pool, would be similar to current operations. All potentially hazardous materials are and would continue to be handled and disposed of in accordance with manufacturers' specifications and instructions. Therefore, the risk of exposing hazardous materials and emissions to students during operation of the Project would be limited.

With the exception of construction-generated emissions that will be further discussed in the EIR, the proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste that could impact Terra Linda High School. Impacts would be less than significant, and this item will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project site is not included on any hazardous waste site lists including the Department of Toxic Substances Control's EnviroStor database, which includes CORTESE sites.[23] The Environmental Protection Agency's database of regulated facilities lists Terra Linda High School as a small quantity generator; however, hazardous wastes generated by the campus would be typical of construction and operation activities for schools, as discussed in

[23] California Department of Toxic Substances Control, EnviroStor Database, Search by Map Location, accessed July 20, 2023, http://www.envirostor.dtsc.ca.gov/public/.

checklist question 3.9(a).[24] According to the State Water Resources Control Board's GeoTracker site, there are no leaking underground storage tank cleanup sites within 1,000 feet of the Project site.[25] As such, the proposed Project would not create a significant hazard to the public or the environment, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

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

No Impact. The Project site is located approximately 1.7 miles southwest of the San Rafael Airport. The San Rafael Airport is a private airstrip with minimal air traffic.[26] The airport noise contours from 2003 for the airport do not extend much beyond the runway, and aircraft noise does not substantially affect nearby sensitive receptors. According to the San Rafael Airport Noise Contours Map, the Project site is located outside of the 60 and 55 decibel noise contours and thus would not be affected by aircraft noise.[27] As the proposed Project would involve proposed improvements to existing campus facilities, no impact would occur related to a safety hazard or excessive noise for people residing or working in the Project area. This issue will not be further analyzed in the EIR.

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The San Rafael Local Hazard Mitigation Plan (LHMP) is a guide to hazard mitigation planning within the City of San Rafael and serves as a tool to help decision-makers direct hazard mitigation activities and resources. The LHMP contains hazard mitigation actions that reduce the risk of damage or injury from hazards. Terra Linda High School is identified as a Critical Facility in the LHMP that can be used as community space in the event of an emergency. The proposed Project would not eliminate the availability of the campus for use as a critical facility. However, construction activities may limit use of the entire property. Construction areas would be fenced, and construction would be short term and completed in phases. The remainder of the campus would be available for community use, including the stadium, commons, competitive and practice gymnasiums, and parking lots. Moreover, all construction staging and loading activities would occur within the boundaries of the campus to limit traffic congestion and allow continued access on the adjacent streets. Therefore, the proposed Project would not impair implementation of the LHMP, and Project impacts on the City's LHMP would be less than significant. This issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The Project site is within the Wildland Urban Interface, defined as an area where structures and other human development meet or intermingle within wildland

[24] United States Environmental Protection Agency, Envirofacts Database, accessed July 20, 2023, https://enviro.epa.gov/.
[25] California State Water Resources Control Board, GeoTracker Database, Search by Map Location, accessed July 20, 2023, http://geotracker.waterboards.ca.gov/map/.
[26] City of San Rafael, General Plan 2040/EIR – Noise, pages 4.13-16 and 25.
[27] City of San Rafael, General Plan 2040/EIR – Noise, pages 4.13-16 and 25.

vegetation.[28] The proposed Project would be compliant with the California Building Standards, which works to ensure fire and life safety, including from hazards related to wildland fires. Proposed new and modernized structures would be improved to meet current requirements for all fire systems, including but not limited to sprinkler systems, fire alarm systems, fire flow, and fire protection equipment. All construction plans would be checked by the Division of the State Architect. The local fire authority, San Rafael Fire Department (SRFD), would also review the plans to ensure adequate access to roads, fire lanes, and fire hydrant locations and distributions. The Project would improve the existing conditions and would not exacerbate wildland fire risks at the campus or surrounding residential uses. Impacts related to wildland fires would be less than significant, and this issue will not be further analyzed in the EIR.

[28] Marin County, Wildland Urban Interface Map, accessed July 18, 2023, https://www.arcgis.com/apps/webappviewer/index.html?id=688f506cfb144067826bb35a062b0f0a.

3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☒	☐	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	☒	☐	☐	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☒	☐	☐	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☒	☐	☐	☐
iv) impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☒	☐	☐	☐

Discussion

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Potentially Significant Impact. Water quality standards and waste discharge requirements, including the federal Water Pollution Control Act Amendment of 1972 (also referred to as the Clean Water Act) and the California Porter-Cologne Water Quality Control Act (Section 13000 et seq. of the California Water Code), are intended to protect the quality of waters within the state of California and require that comprehensive water quality control plans be developed. The Project site is within the jurisdiction of the San Francisco Bay RWQCB. Impacts related to water quality would fall under two general categories: short-term construction-related impacts and long-term operational impacts. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Operational impacts may result from the increase in impermeable surfaces, which could increase on-site and/or off-site stormwater runoff.

The proposed Project would involve capital improvements to the high school campus. Construction-related runoff and pollutants would be controlled with the implementation of best management practices, including the SWPPP and erosion control plan. Upon Project implementation, there would be new landscaping, pathway, and turf improvements, which would result in changes to the Project site's existing hydrology and drainage conditions. Although the proposed Project is not anticipated to substantially degrade surface or ground water quality, further evaluation will be provided in the EIR. Impacts are considered potentially significant.

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

Less Than Significant Impact. The proposed Project site is located within the San Francisco Bay Basin, and the San Francisco Bay RWQCB addresses regionwide water quality issues through the creation and triennial update of the San Francisco Bay Basin Water Quality Control Plan. The Marin Municipal Water District (MMWD) manages groundwater within the City.

The Project site is not located within the groundwater basins identified within the City (San Rafael Valley and Novato Valley Basins).[29] Groundwater resources within the City are limited due to a lack of substantial underlying groundwater aquifers and poor groundwater quality. The potential for municipal groundwater use within the boundaries of the MMWD service area is limited due to limited production capabilities, water quality constraints, and potential water rights issues. As a result, groundwater is not currently used or planned to be used as a municipal water supply source by the MMWD, though private groundwater wells are used.[30] Thus, the proposed Project would use surface water sources and would not use or decrease groundwater supplies. Although the proposed Project would involve landscaping, pathway, and turf improvements, the Project would not result in substantial changes to the existing campus hydrology, and thus, would not substantially change conditions for groundwater recharge. Therefore, impacts would be less than significant, and this issue will not be further addressed in the EIR.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

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

Potentially Significant Impact. No rivers or streams are present on the Project site or in the vicinity. As discussed in response to checklist question 3.7(b), construction of the proposed Project would include ground-disturbing activities, such as grading and excavation, which could result in the potential for erosion to occur at the Project site. The proposed Project would be required to implement standard temporary construction measures for erosion and sediment control. Additionally, as the proposed Project would disturb more than one acre of land, a SWPPP with erosion control measures in compliance with NPDES permit requirements will be required for the proposed Project. Nonetheless, construction activities could result in changes to existing drainage patterns. Additionally, proposed new construction, facility renovation, and the landscaping, pathway, and turf improvements could change the amount and locations of impervious surfaces at the Project site, which may have the potential to contribute to increased erosion or siltation on- or off-site. Impacts are considered potentially significant. Additional

[29] City of San Rafael, General Plan 2040/EIR – Hydrology and Water Quality, page 4.10-17.
[30] City of San Rafael, General Plan 2040/EIR – Hydrology and Water Quality, page 4.10-17.

analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. As discussed in response to checklist question 3.10(c)(i), construction activities could result in changes in drainage patterns. Additionally, proposed new construction, facility renovation, and the landscaping, pathway, and turf improvements could change the amount and locations of impervious surfaces at the Project site. Therefore, the Project may have the potential to increase the rate or amount of surface runoff in a manner which could result in flooding on- or off-site. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Potentially Significant Impact. Under existing conditions, the school campus is developed with hardscape surfaces that influence infiltration and affect stormwater runoff from the site. Stormwater from the site currently is accommodated by connection to the City's public stormwater drainage system. Implementation of the proposed Project would alter existing drainage patterns on-site and increase impervious surfaces that could have the potential to concentrate and increase runoff from the site entering the existing stormwater drainage system, and to generate additional sources of polluted runoff. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

iv. Impede or redirect flood flows?

No Impact. A 100-year flood is a flood defined as having a 1.0 percent chance of occurring in any given year. According to the Federal Emergency Management Agency, National Flood Hazard Layer Viewer, the Project site and surrounding area are located within an Area of Minimal Flood Hazard (Zone X).[31] Therefore, the Project site and the surrounding area are not at risk for flooding. The proposed Project would also include new or relocated connections to the existing stormwater drainage infrastructure to accommodate stormwater runoff from the site and to reduce the risk for the Project to contribute to adverse effects on flood flows. The proposed Project would not impede or redirect flood flows and there would be no impact. This issue will not be further analyzed in the EIR.

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

No Impact. As discussed in response to checklist question 3.10(c)(iv), the Project site and the surrounding area are located within an Area of Minimal Flood Hazard (Zone X). Therefore, the campus and the surrounding area are not at risk for flooding.

Tsunamis are large ocean waves that are generated by major earthquakes, undersea landslides, volcanic eruptions, or other similar seismic activity. Factors influencing the size and speed of a tsunami include the source and magnitude of the triggering event, as well as off-shore and on-shore topography. The Project site is located approximately 3.6 miles west of the San Francisco

[31] Federal Emergency Management Agency, National Flood Hazard Layer Viewer, Flood Insurance Rate Map, search by location, accessed July 24, 2023, https://hazards-fema.maps.arcgis.com/.

Bay, and 14 miles east of the Pacific Ocean. The northern and southern shorelines of San Rafael are within the tsunami inundation zone. However, the Project site is not located within the tsunami inundation zone.[32]

Seiches are large waves generated in enclosed bodies of water in response to ground shaking. There are no large bodies of water in the City that could trigger a seiche.[33] Therefore, the Project site is not within a seiche zone. As the Project site is not in a flood, tsunami, or seiche zone, there is no risk release of pollutants due to a potential inundation, and this issue will not be further analyzed in the EIR.

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Potentially Significant Impact. The proposed Project would be required to comply with and obtain an NPDES Phase II Small Municipal Separate Storm Sewer System Permit from the RWQCB for stormwater control to minimize the discharge of pollutants. Additionally, the District would be required to prepare a SWPPP with erosion control measures in compliance with NPDES permit requirements for the proposed Project. Operational impacts may result from the increase in impermeable surfaces, which could increase stormwater runoff and impact water quality on campus. Therefore, the proposed Project has the potential to conflict with or obstruct implementation of the water quality control plan. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

[32] City of San Rafael, General Plan 2040/EIR – Hydrology and Water Quality, page 4.10-31.
[33] City of San Rafael, General Plan 2040/EIR – Hydrology and Water Quality, page 4.10-31.

3.11 Land Use and Planning

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

Discussion

a) Would the project physically divide an established community?

No Impact. While there are developed residential uses within the vicinity, the Project site is a fully developed and operating high school campus. The proposed Project would involve phased improvements for the existing aquatics center, physical education spaces, classrooms, stadium, fields, and tennis courts. All development pursuant to the proposed Project would occur within the existing campus boundaries. Any construction activities would be temporary and would not encroach upon existing neighborhoods or the surrounding community. Additionally, proposed pedestrian improvements for ADA compliance would occur within the existing boundaries of the Project site. Therefore, the proposed Project would not physically divide an established community, and no impact would occur. This issue will not be further analyzed in the EIR.

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

No Impact. The Project site has a City of San Rafael General Plan land use designation of Public/Quasi-Public, which includes public schools as an allowed land use type.[34] All development pursuant to the proposed Project would occur within the existing campus boundaries. Implementation of the proposed Project would not increase the capacity of Terra Linda High School, nor would the attendance boundaries change. No changes to the existing land use designation are required or proposed with the Project. Additionally, the proposed Project would result in a continuation of the existing use of the site (public school facilities) and would not conflict with the intended use of the campus or with surrounding land uses. Therefore, the proposed Project would not conflict with any applicable land use plan, policy, or regulation of an adopted for the purpose of avoiding or mitigating an environmental effect.[35] There would be no impact, and this issue will not be further analyzed in the EIR.

[34] City of San Rafael, 2021, San Rafael General Plan 2040 Land Use Map.

[35] Pursuant to California Government Code Section 53094 et seq., the governing board of a school district may render city or county zoning ordinances and general plan requirements inapplicable. It is anticipated that the District's Board of Education will exempt the proposed Project and campus from any zoning ordinances or regulations of the City of San Rafael, including, without limitation, the City's Municipal Code, General Plan, and related ordinances and regulations that otherwise would be applicable.

3.12 Mineral Resources

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

Discussion

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. California's Surface Mining and Reclamation Act of 1975 requires the State Geologist to classify land into mineral resource zones (MRZ) based on the known or inferred mineral resource potential of that land. The California Department of Conservation's Mineral Resources Program provides data about California's varied non-fuel mineral resources (such as metals and industrial minerals), naturally occurring mineral hazards (such as asbestos, radon, and mercury), and information about active and historic mining activities throughout the state.[36] Classification is completed by the State Geologist wherein lands classified MRZ-1 are areas where geologic information indicates no significant mineral deposits are present; lands classified MRZ-2 are areas that contain identified mineral resources; lands classified MRZ-3 are areas of undetermined mineral resource significance; and lands classified MRZ-4 are areas of unknown mineral resource potential.[37]

According to the California Geological Survey's Updated Mineral Land Classification Map, the Project site is located on lands classified MRZ-3.[38] The Project site is not located on lands that contain identified mineral resources. Additionally, the Project site does not contain any oil wells, and no oil extraction occurs within the Project site.[39] Historical uses of Terra Linda High School have not included mineral extraction, nor does the campus currently support mineral extraction. In addition, the proposed Project does not include any mineral extraction activities. Therefore, the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state, and no impact would occur. This issue will not be further analyzed in the EIR.

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36 California Department of Conservation, The California Mineral Resources Program, accessed July 11, 2023, https://www.conservation.ca.gov/cgs/mrp.

37 California Department of Conservation, Guidelines for Classification and Designation of Mineral Lands, accessed July 11, 2023, https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf.

38 California Department of Conservation, Updated Mineral Land Classification Map for Portland Cement Concrete-Grade Aggregate in the North San Francisco Bay Production-Consumption Region, Marin, Napa, Sonoma, and Southwestern Solano Counties, California, 2013.

39 California Department of Conservation, Geologic Energy Management Division's (CalGEM) Well Finder, accessed July 11, 2023, https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.10827/33.78270/16.

b) Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. As described in response to checklist question 3.12(a), the Project site is not located on lands that contain identified mineral resources. Additionally, the Project site does not contain any oil wells, and no oil extraction occurs within the Project site. The San Rafael Rock Quarry and McNear Brickworks is designated as a mineral resource with local, regional, or state significance within the vicinity of the City.[40] The San Rafael Rock Quarry and McNear Brickworks is located approximately 4.9 miles east of the Project site and would not be impacted by the proposed Project. The proposed Project would involve capital improvements to campus facilities and would not affect any existing oil, gas, or other mineral resource recovery facilities. No impact would occur, and this issue will not be further analyzed in the EIR.

[40] City of San Rafael, General Plan 2040/EIR – Mineral Resources, page 4.12-2.

3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☒	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Potentially Significant Impact. Construction activities have the potential to generate noise levels that exceed applicable standards in proximity to sensitive noise receptors, such as residential uses. The proposed Project would involve capital improvements including rehabilitation, modernization, upgrades, and new construction for facilities. During Project operation, the competitive-level aquatic center, proposed lighting at the aquatics center, and the proposed artificial turf at the ballfields would allow for extended use of the facilities. A noise and vibration technical report will be prepared for the proposed Project to assess the potential for short-term and long-term increases in noise levels and any associated impacts. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact. Construction activities associated with the proposed Project may generate ground-borne vibration from use of heavy equipment. The noise and vibration technical report prepared for the proposed Project will evaluate the potential for ground-borne noise and vibration, as well as any associated impacts. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

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

No Impact. The Project site is located approximately 1.7 miles southwest of the San Rafael Airport. The San Rafael Airport is a private airstrip with minimal air traffic.[41] The airport noise contours from 2003 for the airport do not extend much beyond the runway, and aircraft noise does not substantially affect nearby sensitive receptors. According to the San Rafael Airport Noise Contours Map, the Project site is located outside of the 60 and 55 decibel noise contours and thus would not be affected by aircraft noise.[42] As the proposed Project would involve proposed improvements to campus facilities within the existing boundaries of the Project site, no impact would occur related to excessive noise for people residing or working in the Project area. This issue will not be further analyzed in the EIR.

41 City of San Rafael, General Plan 2040/EIR - Noise, pages 4.13-16 and 25.
42 City of San Rafael, General Plan 2040/EIR - Noise, pages 4.13-16 and 25.

3.14 Population and Housing

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

Discussion

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. Given the temporary nature of construction industry jobs, the relatively large regional construction industry, and the relatively nominal total number of construction workers needed during any construction phase, the labor force from within the region would be sufficient to complete Project construction without an influx of new workers and their families. Therefore, construction of the proposed Project would not directly induce population growth, and there would be no impact.

The proposed Project would consist of capital improvements at an existing school campus within a built-out, urbanized community. The Project does not include the construction of new homes, businesses, or changes to the existing land uses on-site. The Project would include improvements to existing paths of travel within the campus to meet ADA standards, such as walkways within the stadium, fields, and tennis courts; however, the Project would not extend roads or other infrastructure. Although Project implementation would allow extended use of the improved facilities by the high school and community, the Project would not increase student enrollment or capacity at the campus. Therefore, no direct or indirect increases in population growth would result with implementation of the proposed Project, and no impact would occur. This issue will not be further analyzed in the EIR.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. As described in response to checklist question 3.14(a), the proposed Project would occur within an established school campus. The proposed Project would not involve the removal or relocation of any housing, and therefore would not displace any people or necessitate the construction of any replacement housing. No existing residences would be displaced or removed as a result of the proposed Project. No impact would occur, and this issue will not be further analyzed in the EIR.

3.15 Public Services

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

Discussion

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

i. Fire Protection?

Less Than Significant Impact. The SRFD provides fire protection services to the Project site. The SRFD operates six stations within the City, staffed with approximately 90 professionals trained in specialties including emergency medical care, firefighting, hazardous materials, and emergency preparedness.[43] The closest fire station is San Rafael Fire Station 56, located at 650 Del Ganado Road, approximately 1.1 miles northwest of the Project site.

During the proposed Project's construction, notice to and coordination with the SRFD would be ongoing and emergency access to the Project site and surrounding areas would be maintained. In addition, the proposed Project would involve upgrading fire and security alarm systems to meet current state standards, thus improving current fire protection measures, including the existing fire sprinkler systems, fire alarm systems, fire flow, and fire protection equipment. All plans would be checked by the Division of the State Architect to ensure the proposed Project complies with emergency access, fire, and life safety design standards of Title 24 of the California Code of Regulations. The SRFD would also review the plans to ensure adequate emergency access. Compliance with existing regulations and standards would minimize hazards to life and property in the event of a fire.

[43] San Rafael Fire Department, "Fire Department History," accessed July 12, 2023, https://www.cityofsanrafael.org/fire-department-history/.

Furthermore, an increase in demand for fire protection services is typically associated with an increase in population. The proposed Project would not result in an increase in student enrollment or faculty at the campus or include other developments such as new residential uses that would increase the demand for fire protection services. Although Project implementation would allow extended use of the improved facilities by the high school and community, the Project site and surrounding area are already served by the SRFD, and the extension of facility hours would not result in additional need for fire protection services. Therefore, the proposed Project would not require the provision of new or physically altered fire protection facilities to maintain acceptable service ratios, response times, or other performance objectives such that environmental impacts would result. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

ii. Police protection?

Less Than Significant Impact. The San Rafael Police Department (SRPD) provides police protection services to the Project site. The SRPD has one station, located at 1375 Fifth Avenue, approximately 2 miles southeast of the Project site. The SRPD is staffed by approximately 90 employees.[44]

During construction of the proposed Project, notice to and coordination with the SRPD would be ongoing and emergency access to the Project site would be maintained. Active construction areas would be fenced and would remain secured outside of work hours. In addition, the proposed Project would involve upgrading fire and security alarm systems to meet current District standard systems, thus improving current security measures.

Similar to checklist question 3.15(a)(i), an increase in demand for police protection services is typically associated with an increase in population. The proposed Project would not result in an increase in student enrollment or faculty at the campus, nor would the Project include other developments that would increase the demand for law enforcement that would trigger the need for expanded police facilities. Although Project implementation would allow extended use of the improved facilities by the high school and community, the Project site and surrounding area are already served by the SRPD, and the extension of facility operations would not result in an additional need for police protection services. Therefore, the proposed Project would not require the provision of new or physically altered police protection facilities to maintain acceptable service ratios, response times, or other performance objectives such that environmental impacts would result. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

iii. Schools?

No Impact. The San Rafael City Schools community includes the San Rafael Elementary School District and the San Rafael High School District, with a total student population of approximately 7,000. The San Rafael High School District provides secondary education to students residing in two elementary districts (Miller Creek Elementary District and San Rafael Elementary District) and has two comprehensive 9th-12th grade high schools and a continuation high school.[45]

The proposed Project would help meet the goals of the District to maintain their capital facilities through upgrades and modernization of the aquatics center, physical education support spaces,

[44] San Rafael Police Department, “Contact Us,” accessed July 12, 2023, https://www.srpd.org/contact.
[45] San Rafael City Schools, “About SRCS,” accessed July 12, 2023, https://www.srcs.org/9419_3.

main classroom buildings, stadium, baseball and softball fields, and tennis courts. The upgrades and modernization would result in improvements to resiliency to damage, ADA access, and security and fire protection measures. As such, the proposed Project would have a beneficial impact by improving an existing school for current and future students. Additionally, implementation of the proposed Project would not increase student enrollment or capacity at the school or trigger the need for new or expanded school facilities, which is typically associated with residential development. No impact would occur. This issue will not be further analyzed in the EIR.

iv. Parks?

No Impact. The City's Department of Public Works manages the 18 parks in the City. The closest City park to the Project site is Freitas Park, located at 81 Trellis Drive, approximately 0.4 miles northwest.[46]

An increase in population or housing is generally associated with an increase in demand for parks. As discussed in Section 3.14, Population and Housing, the proposed Project would not increase the capacity of the school nor result in an increase in housing or population in the City. Thus, the Project would not result in additional demand for the City's parks. In addition, the proposed Project would upgrade the current recreational facilities on-site (e.g., the aquatics center, ballfields, and tennis courts), improving recreational amenities available for use by current and future students, as well by the public via the Civic Center Act. Therefore, the proposed Project would not create a need for new or expanded parks, and no impact would occur. This issue will not be further analyzed in the EIR.

v. Other public facilities?

No Impact. An increase in population or housing is generally associated with an increase in demand for other public facilities (e.g., libraries, community centers, wellness centers). As the proposed Project would not increase the capacity of the school or result in an increase in housing or population in the City, implementation of the proposed Project would have no impact on other public facilities. This issue will not be further analyzed in the EIR.

[46] City of San Rafael, Parks, accessed July 12, 2023, https://www.cityofsanrafael.org/parks/#/maps-1/map/parks.

3.16 Recreation

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

Discussion

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

Less Than Significant Impact. The proposed Project would serve an existing student population and would not increase student enrollment. It would also not increase population in the surrounding community. The proposed Project, however, would result in extended operations of the aquatic center and ballfields, which are existing recreational facilities. Expanded use would include CIF tournaments; extended water polo and swim team practices at the aquatic facilities; and year-round use of the artificial ballfields, which would no longer be closed for seeding and maintenance. Additionally, pursuant to the Civic Center Act, the recreational facilities would continue to be available for community use. Although the Project would result in extended operations of campus recreational facilities, the Project would improve them, and the District would continue to maintain the facilities to extend their life and limit deterioration. Therefore, the Project's potential impacts to recreational facilities would not be accelerated and are considered less than significant. This issue will not be further analyzed in the EIR.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Potentially Significant Impact. Implementation of the proposed Project would involve the expansion of recreational facilities on the school property, the construction of which may have an adverse physical effect on the environment, as evaluated throughout this document. As provided herein, the Draft EIR will further evaluate the Project's recreational facilities' impacts on aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, greenhouse gas emissions, hydrology/water quality, noise, recreation, transportation/traffic, and tribal cultural resources. As such, impacts regarding the construction of recreational facilities are considered potentially significant and will be further evaluated in the EIR.

3.17 Transportation

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

Discussion

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

Potentially Significant Impact. The proposed Project would include improvements to pedestrian facilities, including ADA-compliant walkways and paths of travel. A transportation impact assessment technical report will be prepared for the proposed Project to evaluate the potential for the proposed improvements to conflict with a program plan, ordinance, or policy addressing the circulation system. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. Construction of the proposed Project would generate vehicle trips from the mobilization of workers, equipment, and haul trucks to and from the campus, resulting in a temporary increase in traffic. Although the proposed Project would not change the land use at the Project site or increase the student capacity of the school, the Project would result in extended use of the facilities with proposed improvements. The transportation impact assessment technical report will evaluate the proposed Project's potential to generate vehicle miles traveled, and its impact on vehicle miles traveled. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

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

Less Than Significant Impact. During construction, vehicles associated with construction personnel commute trips would be a compatible use on the local road networks. Implementation of the proposed Project would include improvements to pedestrian facilities, including ADA-compliant walkways and paths of travel. However, the proposed Project would not permanently impact existing conditions for vehicular access or public roadways. The Project would not include

off-site improvements or alter existing driveways or parking lots. Therefore, impacts related to hazards due to a design feature would be less than significant, and this issue will not be further analyzed in the EIR.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. Construction activities for the proposed Project would be confined to the Project site with the exception of haul trucks and construction worker trips. Any construction-related traffic would be temporary and coordinated with operations of the school, ensuring that trucks are not moving in or out of the site during drop-off or pickup times and that emergency access is not impeded. During construction, ingress and egress to the Project site would be maintained at all times. Notice to and coordination with the administrators at Terra Linda High School and emergency service providers, including the SRFD and SRPD, would be ongoing regarding the construction schedule and worksite traffic control plans so as to coordinate emergency response routing and maintain emergency access.

Implementation of the proposed Project would result in improved walkway and path of travel conditions to meet ADA standards. Existing vehicular circulation or public roadways in the Project vicinity would not be modified as part of the proposed improvements. Emergency access to the Project would remain similar to existing conditions. Therefore, construction and operation of the proposed Project would result in less than significant impacts related to inadequate emergency access. This issue will not be further analyzed in the EIR.

3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☒	☐	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision(c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☒	☐	☐	☐

Discussion

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?

Potentially Significant Impact. The proposed Project would involve improvements to campus facilities, which would require ground-disturbing activities during construction. Although the campus is currently developed, and therefore previously disturbed, ground-disturbing activities would have the potential to impact unknown tribal cultural resources. The cultural resources technical report prepared for the proposed Project will assess potential impacts to tribal cultural resources. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. The proposed Project involves improvements which would include ground-disturbing activities during construction that may have the potential to impact unknown cultural resources, including tribal cultural resources. Pursuant to Assembly Bill 52, the District will notify California Native American tribes known to have interest in the area to determine Project impacts and mitigation measures. The cultural resources technical report prepared for the proposed Project will assess potential impacts to tribal cultural resources and will outline the Assembly Bill 52 consultation efforts conducted for the proposed Project. Impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water

Water to the Project site is supplied by the MMWD. The MMWD serves roughly 190,000 customers within approximately 147 square miles along the eastern corridor of Marin County. The MMWD serves ten incorporated cities and towns: San Rafael, Mill Valley, Fairfax, San Anselmo, Ross, Larkspur, Corte Madera, Tiburon, Belvedere, and Sausalito. Approximately 27 percent of the MMWD's customer meters are in San Rafael. The MMWD's water supplies presently come from a combination of local surface water supplies, imported water from the Sonoma County Water Agency and recycled water.[47]

[47] City of San Rafael, General Plan 2040/EIR – Utilities and Service Systems.

Wastewater

Wastewater collection and treatment for the Project site is provided by Las Gallinas Valley Sanitary District (LGVSD). The LGVSD serves a population of approximately 32,000 persons north of Puerto Suello Hill and neighboring unincorporated areas of Marin County and covers approximately 20 square miles. The LGVSD's collection system consists of 105 miles of gravity sewer pipelines, 6.7 miles of force mains, and 28 pump stations. The LGVSD also operates the LGVSD wastewater treatment plant.[48]

Stormwater

The City of San Rafael Department of Public Works (DPW) owns and maintains the storm drain system that is located throughout the City. The storm drain system comprises 20 miles of corrugated metal pipes, 84 miles of concrete pipe, and 12 miles of plastic pipe. It has 3,800 drain inlets, 20 major headwalls, and 745 smaller headwalls. The DPW also maintains approximately 35 miles of open ditches and culverts and operates 12 stormwater pump stations. The DPW is responsible for maintaining the storm drains in City easements, and property owners are responsible for storm drains on their properties. Existing stormwater facilities include stormwater pipes on the eastern half of the campus under Nova Albion Way, Golden Hinde Boulevard, and Devon Drive.[49]

Electricity

Marin Clean Energy (MCE) is the default electricity provider for all communities in Marin County, including San Rafael, and several other communities in the San Francisco Bay Area. As a Community Choice Aggregation program and not-for-profit public agency, MCE is independently run by representatives from participating communities. MCE provides electricity generated from renewable sources such as solar, wind, bioenergy, geothermal, and hydropower, which is delivered to customers through Pacific Gas and Electric Company (PG&E) transmission lines.[50]

Natural Gas

PG&E provides natural gas services to the City and provides electricity services to customers who have opted out of participating in MCE. PG&E owns and maintains above- and belowground networks of electric and gas transmission and distribution facilities throughout the City.[51]

Telecommunications

According to the Community Services and Infrastructure Element of the San Rafael General Plan 2040, telecommunication services within the City include traditional landline telephone services, cable and satellite television services, and mobile telephone services, as well as fiber/broadband and other internet services. These services are offered by multiple providers and are regulated to varying degrees by the California Public Utilities Commission and Federal Communications Commission.[52]

Impact Analysis

Implementation of the proposed Project would not require off-site improvements. The new facilities would tie into existing underground utilities located within the campus. The proposed

[48] City of San Rafael, General Plan 2040/EIR – Utilities and Service Systems.
[49] City of San Rafael, General Plan 2040/EIR – Utilities and Service Systems.
[50] City of San Rafael, General Plan 2040/EIR – Energy.
[51] City of San Rafael, General Plan 2040/EIR – Energy.
[52] City of San Rafael, General Plan 2040/EIR – Community Services and Infrastructure Element, pages 11-17.

Project would not result in an increase in student enrollment or faculty at the campus. Although the proposed pool (25 meters by 40 yards) would be larger in size compared to the existing pool (25 meters by 25 yards), once filled, the new pool would not require substantially more water to maintain than the existing pool. Water replacement related to the potential loss of water from evaporation and maintenance activities would not be substantially more than existing, especially since any additional water demand would be offset by the reduction of water usage from the proposed replacement of the natural turf with artificial turf. Moreover, all proposed improvements would be required to include water conservation features, including but not limited to low-flow, water-efficient plumbing fixtures and low-water irrigation systems with smart sensor controls. Accordingly, the Project would not increase the demand for water from the City's water supply and would not increase wastewater flows entering the City's wastewater treatment plant. Thus, the proposed Project would not require the construction of new water or wastewater facilities that would result in a physical impact to the environment. Impacts to water and wastewater facilities would be less than significant.

The school is entirely developed, and runoff off-site is collected and enters into the City of San Rafael's storm drain system. New impermeable surfaces, including artificial turf fields, would be designed and engineered to capture increased runoff and release it at a rate less than pre-construction. Accordingly, the Project would not increase off-site stormwater runoff and require the construction of new off-site stormwater drainage facilities operated by the City of San Rafael, which would result in a physical impact to the environment. Impacts would be less than significant.

The Project would relocate PG&E-owned underground feeder lines for the primary switchgear on campus. The PG&E utilities relocation would be conducted as part of the overall construction activities that would occur under the Project. The utilities relocation would not cause adverse environmental impacts beyond what is already analyzed throughout this document for the overall Project components. No natural gas or telecommunications facilities would be relocated, constructed, or expanded as a result of the proposed Project. The Project would result in less than significant impacts related to these facilities, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. Construction of the proposed Project would require nominal amounts of water for activities, such as dust suppression and washing equipment. These activities would not result in significant water demand and would cease after construction is complete. During operation, the proposed Project would not result in substantially more water than existing conditions as the proposed Project would not increase capacity. Although the proposed pool would be larger in size compared to the existing pool, the increase in water usage for the proposed pool would be expected to be offset by the reduction of water usage from the replacement of the natural turf with artificial turf. Additionally, the new school buildings would be designed to meet the latest California Building Code, which would require installation of water conservation features, such as faucet aerators and high-efficiency toilets and urinals. Some new facilities would be dual plumbed with reclaimed water to further conserve water.

Water demand in the City is anticipated to increase by 1,098 acre-feet per year (afy) by 2040. In the year 2040, the MMWD is expected to have a residual water supply capacity of 110,685 afy for a normal year and 18,333 afy at the end of three multiple dry years. Therefore, the MMWD would have sufficient water supply to meet the demand of potential future buildout in the City

through 2040, during normal, dry, and multiple dry years.[53] Consequently, there would be sufficient water supplies available to serve the Project site during normal, dry and multiple dry years. Moreover, proposed improvements would incorporate water conservation features, such as faucet aerators and high-efficiency toilets and urinals, etc., in conformance with applicable codes and regulations pertaining to energy use and reduction. The proposed synthetic turf fields would also reduce the demand for water at the Project site, and the proposed pool would be designed with improved systems to recycle water, as compared to the existing pool. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. Sanitary sewer service to the school campus would continue to be provided by the LGVSD through its wastewater collection and treatment system, similar to existing conditions. As no increase in school capacity is associated with development of the proposed Project. Expanded operational uses of the proposed facility improvements may result in a nominal increase in wastewater at the campus. However, the increase would not result in substantially greater wastewater collection and treatment demand than that associated with current operations at the Project site. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

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

Less Than Significant Impact. The City is serviced by Marin Sanitary Service, the Marin Recycling Center, the Marin Resource Recovery Center, and the Marine Household Hazardous Waste Facility. The Redwood Landfill and Potrero Hills Landfill accept most of the solid waste from the County.[54] During construction, the proposed Project would generate solid waste from demolition and excavation activities. However, the District is required to comply with the CALGreen waste diversion requirements and with Assembly Bill 341, which mandates recycling for commercial and multifamily residential land uses as well as schools.[55]

The Project would not increase the student seating capacity of Terra Linda High School. However, it would result in extended operations of the proposed facilities, (i.e., morning and evening use of the pool and year-round availability of the ballfields). The amount of solid waste generated by the expanded operations would be minor and would not be substantial or significantly increase the amount of solid waste already generated by the existing school. Solid waste would continue to be disposed of at the Redwood Landfill and Potrero Hills Landfill, and other landfills throughout the County. The Redwood Landfill has a maximum permitted throughput of 2,300 tons/day and a remaining capacity of 26 million tons, with an estimated closure date of July 1, 2036. The Potrero Hills Landfill has a maximum permitted throughput of 4,330 tons/day and a remaining capacity of 13,872,000 tons, with an estimated closure date of February 14, 2048.[56] As the Project would not change the use of the property and the amount of solid waste that would be generated from the proposed expanded operations of the campus would be similar or negligible as compared to existing conditions, the existing landfills would have sufficient capacity to accommodate the

53 City of San Rafael, General Plan 2040/EIR – Utilities and Service Systems.
54 City of San Rafael, General Plan 2040/EIR – Utilities and Service Systems.
55 CALGreen Code: California Green Building Standards Code, California Code of Regulations, Title 24, Part 11.
56 City of San Rafael, General Plan 2040/EIR – Utilities and Service Systems.

relatively minor amounts of waste that would be generated by the proposed Project. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. The proposed Project would comply with all federal and state statutes regarding solid waste reduction. The proposed Project would also comply with CALGreen, which requires that at least 65 percent of nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. The proposed Project would also comply with Assembly Bill 341, which mandates recycling for schools and school districts. Therefore, the proposed Project would comply with all applicable federal, state, and local solid waste regulations, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Discussion

a) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. According to the California Department of Forestry and Fire Protection's Fire and Resource Assessment Program, the Project site is not located within a State Responsibility Area (SRA) nor does the Project site contain lands designated as Very High Fire Hazard Severity Zones (VHFHSZ).[57] However, the Project site is located near an SRA, located approximately 0.4 miles to the south, within the mountainous area of Sorich Park. The Project site is also located within the Wildland Urban Interface.[58]

The proposed Project would improve existing school facilities to meet current fire and life safety requirements in compliance with the California Building Code. Proposed facilities would be modernized and new structures would be provided with new fire systems, including but not limited to sprinkler systems, fire alarm systems, fire flow, and fire protection equipment. The SRFD would review the plans to ensure that adequate access to roads, fire lanes, and fire hydrant locations and distributions is provided. The Project would improve the existing conditions and would not exacerbate fire risks at the campus or surrounding residential uses.

[57] California Department of Forestry and Fire Protection, Fire and Resource Assessment Program, Fire Hazard Severity Zone Viewer, accessed July 14, 2023, https://egis.fire.ca.gov/FHSZ/.

[58] Marin County, Wildland Urban Interface Map, accessed July 18, 2023, https://www.arcgis.com/apps/webappviewer/index.html?id=688f506cfb144067826bb35a062b0f0a.

Emergency evacuation routes in the Project area include the primary route of Nova Albion Way, and the secondary routes of Devon Drive and Tamarack Drive.[59] Project construction staging and loading areas would occur within the boundaries of the campus to maintain traffic flow on the adjacent streets and emergency routes. The District would provide ongoing notice to and coordinate with emergency service providers, including the SRFD and SRPD, regarding the construction schedule and worksite traffic control plans to coordinate emergency response routing and maintain emergency access. The Project would not increase the capacity of the school. Proposed expanded operational use of the aquatic center, ballfields, and tennis courts would not be substantially greater than that existing. Therefore, neither construction nor operation of the Project would impair the City's emergency response and evaluation plans.

Additionally, as discussed in Section 3.9(f), the Project would not remove the Terra Linda High School designation by the LHMP as a critical facility. The campus would remain available as community space in the event of an emergency, including during Project construction. The proposed Project would not conflict with City plans addressing emergency response and evacuation, and the District would cooperate with the SRFD and SRPD for emergency access. Therefore, though the proposed Project is near an SRA, it would not impair the adopted emergency evacuation or response plan. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

b) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. The Project site is not located in an SRA or VHFSZ; however, it is located near an SRA and within the Wildland Urban Interface. Areas with steep slopes in the City include Terra Linda Sleepy Hollow Open Space Area in the northwest corner of the City, Southern Heights Ridge on the southwestern edge of the City, and Black Canyon and San Pedro Mountain in the eastern portion of the City.[60]

The Project site is located approximately 0.4 miles north of the Terra Linda and Sleepy Hollow Open Space, which is a horseshoe-shaped preserve covering the ridges south, east, and northeast of the Project site. At its closest point, the Project site is about 200 to 300 feet north of the open hillside; residential uses and Devon Drive separate the Project site from the open hillside. The proposed Project would not affect the hillside. The Project site itself is relatively flat and the proposed improvements would occur only on the existing high school campus. Thus, the proposed Project would not create new slopes or propose development on a slope. The proposed Project would also not exacerbate wind conditions in the area; however, wildfires and fire-related air pollution hazards that could originate in the Project vicinity could be spread by prevailing winds. Furthermore, site plans for the proposed Project would be subject to review by the Division of the State Architect, based on the California Building Code and California Fire Code. Therefore, the proposed Project would not expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

[59] Marin County, Wildland Urban Interface Map, accessed July 18, 2023, https://www.arcgis.com/apps/webappviewer/index.html?id=688f506cfb144067826bb35a062b0f0a.

[60] City of San Rafael, General Plan 2040/EIR - Wildfire, page 4.18-16.

c) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. The Project site is not located in an SRA or VHFSZ; however, it is located near an SRA and within the Wildland Urban Interface. The proposed Project would not require the installation or maintenance of infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) associated with high fire zones that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. The Project involves the modernization of existing school facilities on a developed school campus, surrounded by residential uses. Project implementation would not require off-site improvements, and the new facilities would tie into existing underground utilities located within the campus. Therefore, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

d) If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. The Project site is not located in an SRA or VHFSZ; however, it is located near an SRA and within the Wildland Urban Interface. The Project would modernize existing facilities on the built-out campus. All improvements would comply with the California Building Code Standards and the Clean Water Act. Construction activities would require a SWPPP and erosion control plan to mitigate runoff. All disturbed soils would be restored with new pavement, structures, and/or landscaping to minimize erosion and to allow for continued use of the impacted area. Therefore, the Project would not cause runoff, post-fire slope instability, or drainage changes that would expose people and structures to downslope or downstream flooding or landslides. Impacts will be less than significant, and this issue will not be further analyzed in the EIR.

3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☒	☐	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☒	☐	☐	☐

Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Potentially Significant Impact. As previously discussed, a biological resources technical report will be prepared for the proposed Project, which will evaluate potential impacts to special-status and/or sensitive species. Additionally, a cultural resources technical report will be prepared for the proposed Project, which will evaluate potential impacts to historical and archaeological resources, including tribal cultural resources. Impacts are considered potentially significant, and additional analysis of these issues will be included in the EIR.

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

Potentially Significant Impact. Pursuant to CEQA Guidelines Section 15130, the EIR will include an evaluation of the proposed Project’s potential to contribute to cumulative impacts when considered in combination with the effects of other related projects. Cumulative impacts are considered potentially significant, and additional analysis of this issue will be included in the EIR.

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

Potentially Significant Impact. The proposed Project could potentially result in environmental effects that may cause adverse effects on human beings with regard to the following environmental areas discussed in this Initial Study: aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, noise, recreation, transportation, and tribal cultural resources. These issues will be further evaluated in the EIR with consideration for potential direct and indirect effects on human beings to occur.

4 REFERENCES

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