

**Castilleja School
Conditional Use Permit and Master Plan
Initial Study**

Prepared for:

City of Palo Alto
250 Hamilton, 5th Floor,
Palo Alto, California 94301
Contact: Amy French, Chief Planning Official

Prepared by:

DUDEK
853 Lincoln Way, Suite 208
Auburn, California 95603
Contact: Katherine Waugh

JANUARY 2017

Castilleja School Initial Study

TABLE OF CONTENTS

<u>Section</u>	<u>Page No.</u>
ACRONYMS AND ABBREVIATIONS	II
1 INITIAL STUDY CHECKLIST	1
2 SUMMARY OF FINDINGS	5
2.1 Environmental Factors Potentially Affected.....	5
2.2 Environmental Determination.....	5
3.1 Aesthetics.....	7
3.2 Agriculture and Forestry Resources.....	8
3.3 Air Quality	9
3.4 Biological Resources	12
3.5 Cultural Resources	16
3.6 Geology and Soils.....	17
3.7 Greenhouse Gas Emissions.....	18
3.8 Hazards and Hazardous Materials	19
3.9 Hydrology and Water Quality.....	23
3.10 Land Use and Planning	27
3.11 Mineral Resources	28
3.12 Noise	28
3.13 Population and Housing.....	30
3.14 Public Services.....	31
3.15 Recreation	32
3.16 Transportation and Traffic	33
3.17 Tribal Cultural Resources	34
3.18 Utilities and Service Systems.....	35
3.19 Mandatory Findings of Significance.....	38
4 REFERENCES AND PREPARERS	40
4.1 References Cited	40
4.2 List of Preparers.....	41
FIGURES	
Figure 1 Regional Location.....	43
Figure 2 Site and Vicinity	45
Figure 3 Aerial Map	47
Figure 4 Comprehensive Plan and Zoning Designations	49

Castilleja School Initial Study

ACRONYMS AND ABBREVIATIONS

Acronym/Abbreviation	Definition
ACM	Asbestos containing material
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BMP	Best management practices
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
LCM	Lead-containing materials
NPDES	National Pollution Discharge Elimination System
O3	Ozone
PCB	Polychlorinated biphenyls
PM10	Coarse particulate matter
PM2.5	Fine particulate matter
RWCQB	Regional Water Quality Control Board
TDM	Transportation Demand Management

Castilleja School Initial Study

1 INITIAL STUDY CHECKLIST

This Initial Study evaluates the potential environmental effects that would result from the proposed remodeling of the Castilleja School. This Initial Study has been prepared to satisfy the environmental review requirements under the California Environmental Quality Act (CEQA) applicable to the City of Palo Alto consideration of the proposed project.

1. Project title:

Castilleja School Conditional Use Permit and Master Plan

2. Lead agency name and address:

City of Palo Alto
Department of Planning and Community Environment
250 Hamilton, 5th Floor,
Palo Alto, California 94301

3. Contact person and phone number:

Amy French, Chief Planning Official
(650) 329-2336

4. Project location:

1310 Bryant Street and 1235 and 1263 Emerson Street, Palo Alto, CA 94301. Project site is 286,783 square feet comprised of three parcels: (1) APN 124-12-034 (1310 Bryant, school site), (2) APN 124-12-031 (1235 Emerson, “Emerson House” aka ‘Lockey/Alumnae House’, 75’ on Emerson St), and (3) APN 124-12-033 (1263 Emerson, “Head’s House’, 105’ on Emerson St).

5. Project sponsor’s name and address:

Castilleja School Foundation
Kathleen Layendecker
1310 Bryant Street, Palo Alto, CA 94301

6. General plan designation:

Single Family Residential

Castilleja School Initial Study

7. Zoning:

R-1(10,000)

8. Description of project:

Location:

The proposed project will occur at the existing Castilleja school in Palo Alto, California, as shown in Figure 1, Regional Location, and Figure 2, Site and Vicinity. Construction and operation educational facilities is allowed under the project site's single-family residential land use designation and R-1(10,000) zoning designation.

Objectives:

1. Increase parking on-site.
2. Improve vehicular, pedestrian, and bicycle access for students and staff.
3. Reduce the number of service deliveries and relocate deliveries within the campus to decrease nuisance effects to neighbors.
4. Provide new structures that integrate state-of-the-art technology and teaching practices and retain flexibility to adapt to unanticipated changes.
5. Achieve better architectural compatibility with the adjacent neighborhoods and improve site aesthetics through landscaping.
6. Increase student enrollment from 438 to 540 students (the City Manager authorized enrollment of 438 students in excess of the 2000 Conditional Use Permit cap of 415 students, based upon (1) successful TDM/trip reduction and (2) entering into the Conditional Use Permit amendment process)
7. Ensure no increase in vehicle trips to and from the campus during AM and PM peak hours relative to existing (baseline) traffic volumes.
8. Improve the campus's sustainability and energy efficiency.

Description:

Castilleja School is an all-girls private school in Palo Alto that has been educating 6th to 12th grade girls since 1907 and has been located at the current site since 1910. As shown in Figure 3, Existing Site, the school's facilities include administrative buildings, chapel theater, classrooms, a gymnasium, pool, above ground parking area, playing area, and

Castilleja School Initial Study

track. The project proposal is to demolish two homes on adjacent Castilleja-owned parcels (at 1235 and 1263 Bryant) and merge the two parcels into the Castilleja campus parcel via Parcel Map with Exception, and demolish four existing buildings within the current campus and replace them with a single building. The applicant seeks to expand enrollment and redevelop the existing campus in three construction phases:

1. Construct a below-grade parking structure under the merged parcels to accommodate 130 vehicles, re-route drop-off and pick-up through the garage, and increase enrollment to a maximum of 490 students;
2. Relocate the existing pool, complete bikeway station on Bryant Street Bicycle Boulevard, and increase enrollment to a maximum of 520 students; and
3. Relocate deliveries and waste pick-ups further from the street and below grade, reduce number of food service deliveries by 10%, implement sustainability plan, and increase enrollment to a maximum of 540 students.

In order to accomplish the proposed project, Castilleja School Foundation has submitted an application to amend the school's existing Conditional Use Permit and an Architectural Review application. Including future phase construction of a new campus building, the project would result in an increase in the total building square footage within the campus by 26,700 square feet, all of which would be below grade - above grade the square footage would remain the same. The applicant also proposes to increase the number of off-street parking spaces from 73 to 170. Of these, 130 would be below ground and 40 of which would be in surface parking lots. This would reduce the number of above ground spaces by 33 spaces. The amount of open space would also increase by 6,182 square feet. Finally, the school has proposed to meet a "no new AM or PM Peak hour trips" standard as a condition of project approval and the project includes a Transportation Demand Management Plan to achieve this. The project also includes implementation of a Sustainability Program at the school.

9. Surrounding land uses and setting (Briefly describe the project's surroundings):

The project site is surrounded by residential land uses, predominantly single-family residences. Embarcadero Road, a residential arterial, forms the northern boundary of the project site.

Castilleja School Initial Study

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

The proposed project would not require discretionary approvals from any agency other than the City of Palo Alto.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?:

No tribes that are traditionally and culturally affiliated with the project area have requested consultation pursuant to Public Resources Code section 20180.3.1.

Castilleja School Initial Study

2 SUMMARY OF FINDINGS

2.1 Environmental Factors Potentially Affected

This Initial Study considers the environmental issues identified in Appendix G of the CEQA Guidelines. Where impacts have the potential to be significant, those impacts will be analyzed within the project Environmental Impact Report (EIR).

2.2 Environmental Determination

As shown in the Initial Study, the proposed project has the potential to have some significant impacts. Therefore, in the areas identified below, an EIR is appropriate to evaluate the potentially significant impacts.

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.

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

Castilleja School Initial Study

DETERMINATION: (To be completed by the Lead Agency)

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 ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature

1/23/17
Date

Chief Planning official

Title

Castilleja School Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS:

3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project have a substantial adverse effect on a scenic vista?*
- b) *Would the project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*
- c) *Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*
- d) *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

The proposed project has the potential to have significant impacts and thus Aesthetics will be analyzed in the project EIR.

Castilleja School Initial Study

3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES – 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 Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

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

The proposed project site is located in an urban area and is currently developed. The site is not identified as prime farmland, unique farmland, or farmland of statewide importance and the project site is not under a Williamson Act contract (DOC 2014). It is designated Single Family Residential in the City’s General Plan. The site is not planned for or used for any agricultural purposes and there are no agricultural uses in the vicinity. The

Castilleja School Initial Study

proposed modifications to the existing facility on the project site would not result in the conversion of any agricultural land, conflict with any agricultural use, or conflict with a Williamson Act contract. Therefore, **no impact** would occur as a result of the proposed project.

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))?

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

The project site is not zoned as forest land, does not contain forest land or forest resources, and does not support any forest uses. The proposed modifications to the existing facility on the project site would not result in the conversion of any forest land to a non-forest use. Therefore, **no impact** would occur as a result of the proposed project.

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?

The site is located an in urban area and does not support any farmland, agricultural, or forest uses. The proposed modifications to the existing facility on the project site would not result in conversion of any farm, agricultural, or forest land to non-agricultural or non-forest uses. Therefore, **no impact** would occur as a result of the proposed project.

Mitigation Measures

No mitigation measures are necessary.

3.3 Air Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

The project site is located within the Santa Clara Valley, which is part of the San Francisco Bay Area Air Basin. The Bay Area Air Quality Management District (BAAQMD) has the primary responsibility for ensuring that the San Francisco Bay Area Air Basin attains and maintains compliance with federal and state ambient air quality standards. The BAAQMD regulates air quality through its permit authority over most types of stationary emission sources and through its planning and review process. The BAAQMD adopted the Bay Area 2005 Ozone Strategy (BAAQMD 2006) and the Bay Area 2010 Clean Air Plan (BAAQMD 2010), which are the applicable air quality plans for the region. These plans account for air quality emissions based on the land uses and zoning designated by the City. The uses on the project site are consistent with the designated land use and zoning and the project would not change the land use on the project site. Therefore, the project is consistent with these plans and the impact would be **less than significant**.

b) *Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

c) *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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

Castilleja School Initial Study

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

The San Francisco Air Basin is designated nonattainment for the federal 8-hour ozone (O₃) standard, and is attainment or unclassified for all other federal standards. The area is designated nonattainment for state standards for 1-hour and 8-hour O₃, 24-hour coarse particulate matter (PM₁₀), annual PM₁₀, and annual fine particulate matter (PM_{2.5}). The BAAQMD has adopted CEQA Guidelines (BAAQMD 2011) that establish air pollutant emissions thresholds that identify whether a project would violate any applicable air quality standard or contribute substantially to an existing or projected air quality violation.

The proposed project would expand existing school capacity by 102 students and would implement Transportation Demand Management measures to ensure that traffic volumes associated with the school would not increase. The school capacity screening size established by the BAAQMD for operational impacts is 2,460 students for a junior high and 2,390 students for a high school. The proposed project would accommodate many fewer students than the screening size, and thus would have a less than significant impact on air quality during project operation.

However, it is possible that the project would exceed air quality standards during construction, resulting in potentially significant impacts. Thus, the air quality impacts of project construction will be analyzed in the project EIR.

e) *Would the project create objectionable odors affecting a substantial number of people?*

The project is not considered an odor generating facility as described in the BAAQMD CEQA Guidelines (BAAQMD 2011). The project would not generate odors that could affect a substantial number of people and there would be no impact during project operation. However project construction could generate objectionable odors that could affect the residential and commercial neighbors of the project site. The potential construction odor impacts of the project will be analyzed in the project EIR.

Castilleja School Initial Study

3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES – 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 Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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 Game or U.S. Fish and Wildlife Service?*

The project site has been developed and operated as a school since the early 1900s. The project site does not contain any habitats or biological resources with the potential to support any plant or wildlife species that are designated as threatened or endangered; however, there is potential for nesting birds to be present in trees on site that are proposed for removal or may be trimmed or otherwise affected by construction and there is potential for roosting bats to be present within the existing building. Many species of

Castilleja School Initial Study

migratory birds are considered to have special-status under the federal Migratory Bird Treaty Act while bats are protected under the California Fish and Game Code.

If the proposed tree removal results in take of any migratory bird (as defined in federal code 50 CFR 10.13.), the effect would be considered a significant impact. In conformance with the California State Fish and Game Code and the provisions of the Migratory Bird Treaty Act, the project shall implement Mitigation Measure BIO-1 to reduce the impact to a less-than-significant level by requiring surveys by a qualified technician to evaluate the potential presence of nesting birds prior to tree removal and requiring protection of any active bird nest during construction.

If the proposed building demolition resulted in the removal or disturbance of roosting, this would be a significant impact. Mitigation Measure BIO-2 requires the project applicant to complete a bat survey prior to demolition, and identifies protocols to be followed to ensure that impacts to bats are avoided. With implementation of Mitigation Measures BIO-1 and BIO-2, the project's potential impacts to special status species would be **less than significant**.

- 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 Game or U.S. Fish and Wildlife Service?*
- c) *Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

The project site was originally developed in 1910. The project site does not contain any riparian habitat, sensitive natural community, or federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, the proposed project will have **no impact**.

- 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?*

Wildlife corridors are linear features that connect large patches of natural open space and provide avenues for the migration of animals. Habitat linkages are small patches that join larger blocks of habitat and help reduce the adverse effects of habitat fragmentation; they may be continuous habitat or discrete habitat islands that function as stepping stones for wildlife dispersal. Because the project site is surrounded by existing roads and

Castilleja School Initial Study

development, it does not function as a potential wildlife corridor or habitat linkage. Therefore, the project will have a **less-than-significant impact**.

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

The project would require removal of trees regulated under the City's Tree Ordinance. The project's impact on tree resources is potentially significant and will be analyzed in the project 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?*

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans within the City of Palo Alto. Therefore, the project would have **no impact** related to conflict with the provisions of such plans.

Mitigation Measures

Mitigation Measure BIO-1: If feasible, vegetation on the project site shall be removed outside of the bird-nesting season. If the start of site clearing, tree removal, or building demolition occurs between February 1 and August 31, a pre-construction survey for nesting birds protected under the Migratory Bird Treaty Act shall be conducted by a qualified biologist to identify the location of nests in active use that were established prior to the start of project implementation activities. The pre-construction survey shall take place no more than 7 days prior to initiation of construction. All trees and shrubs on the site and on adjacent properties shall be surveyed, with particular attention to any trees or shrubs that would be removed or directly disturbed. If an active nest of a protected bird is found on site, the biologist shall, in consultation with the California Department of Fish and Wildlife (CDFW), determine whether construction work would affect the active nest or disrupt reproductive behavior. Criteria used for this evaluation shall include presence of visual screening between the nest and construction activities, and behavior of adult birds in response to the surveyors or other ambient human activity. If construction could affect the nest or disrupt reproductive behavior, the biologist shall, in consultation with CDFW, determine an appropriate construction-free buffer zone around the nest to remain in place until the young have fledged or other appropriate protective measures are taken to ensure no take of protected species occurs.

If it is determined that construction will affect an active raptor nest or disrupt reproductive behavior, then avoidance is the only mitigation available. Construction shall

Castilleja School Initial Study

not be permitted within 300 feet of such a nest until a qualified biologist determines that the subject nests are no longer active.

Prior to issuance of a demolition permit or tree removal permit, the City of Palo Alto (City) shall verify that pre-construction surveys have been conducted within 10 days of the proposed start of demolition. If active bird nests are present, the City shall verify that CDFW has been consulted and either determined that construction will not affect an active bird nest or that appropriate construction-free buffer zones have been established or other appropriate protective measures have been taken.

Mitigation Measure BIO-2: No earlier than 30 days prior to initiation of demolition activities, a pre-construction survey shall be conducted by a qualified biologist (i.e., a biologist holding a California Department of Fish and Wildlife (CDFW) collection permit and a Memorandum of Understanding with CDFW allowing the biologist to handle bats) to determine if active bat roosts or maternal colonies are present on or within 300 feet of the demolition area.

Should an active maternity roost be identified, the roost shall not be disturbed and demolition and construction within 300 feet of the maternity roost shall be postponed or halted until the juveniles have fledged and the roost is vacated, as determined by a qualified biologist. Consultation with CDFW shall also be initiated. Under no circumstance shall an active roost be directly disturbed.

If nonbreeding bat hibernacula are found on the project site, the individuals shall be safely evicted under the direction of a qualified bat biologist and with consultation with CDFW. These actions shall allow bats to leave during nighttime hours, thus increasing their chance of finding new roosts with a minimum of potential predation during daylight.

If it is determined that demolition or construction will not affect roosting behavior or disrupt a maternal colony, demolition or construction may proceed without any restriction or mitigation measure.

If it is determined that demolition or construction will affect an active bat roost or disrupt reproductive behavior, then avoidance is the only mitigation available. Under no circumstance shall an active roost be directly disturbed. Demolition or construction within 300 feet shall be postponed or halted until the roost is naturally vacated as determined by a qualified biologist.

Prior to issuance of a demolition permit, the City of Palo Alto (City) shall verify that pre-construction surveys have been conducted within 30 days of the proposed start of demolition. If bats are present, the City shall verify that CDFW has been consulted and

Castilleja School Initial Study

either determined that construction will not affect an active bat roost or disrupt a maternal colony, or that individuals in a nonbreeding bat hibernacula have been safely evicted.

Due to regulations from the California Health Department, direct contact by construction workers with any bat is not allowed.

3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a-d) *Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

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

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

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

a-d) The proposed project has the potential to have significant impacts and thus Cultural Resources will be analyzed in the project EIR.

Castilleja School Initial Study

3.6 Geology and Soils

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS – Would the project:				
a) Expose people or structures to 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a-d) Would the project expose people or structures to 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?**

Castilleja School Initial Study

iv) Landslides?

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

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?

Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

a-d) The proposed project has the potential to have significant impacts and thus Geology and Soils will be analyzed in the project EIR.

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

The project site is currently operated as a school and relies on the City’s sewer system in order to manage its waste water. There is no septic tanks on the project site nor would the proposed project require the use of alternative waste water disposal systems; therefore, the project would have **no impact**.

3.7 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS – Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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?

Although the project would not increase the total square footage of the school buildings, it would accommodate an increase in enrollment of 102 students. The project would

Castilleja School Initial Study

reduce energy use at the campus by replacing four buildings with a new, more energy efficient, building. Additionally the project would implement Transportation Demand Management measures to ensure there is no increase in traffic over existing conditions. These factors would limit the potential for the project to result in increased greenhouse gas emissions. Further, the BAAQMD screening sizes for operational impacts related to greenhouse gas emissions is 46,000 square feet for junior high schools and 49,000 square feet for high schools. The proposed project is below these screening sizes. Operation of the proposed project would have a less than significant impact related to greenhouse gas emissions.

However, the proposed project has the potential to result in significant impacts due to greenhouse gas emissions during construction and these potential impacts will be analyzed in the project EIR.

3.8 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. HAZARDS AND HAZARDOUS MATERIALS – Would the project:				
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

The project involves demolition of four existing buildings and the replacement of which by one singular building. The above ground square footage of the project is expected to remain the same while the below ground square footage would increase by 26,700. During construction, there is the potential for short-term use of hazardous materials and fuels including diesel fuel, gasoline, and other oils and lubricants. These hazardous materials would be handled, transported and disposed of in compliance with all existing local, state and federal regulations. Operation of the proposed project would not require the routine, use, transport or disposal of hazardous waste other than typical household materials, such as cleaning supplies. The types and quantities of these common household materials stored, used, and disposed of on-site would not increase substantially and would not pose a health risk to those utilizing the project site or adjacent users.

The original main buildings present on the project site were constructed in 1910. Due its early date of construction, the buildings may contain asbestos containing materials (ACMs) and lead-based paints. Demolition of the existing buildings could result in hazards related to the release or disposal of these hazardous materials. Mitigation Measure HAZ-1 would require surveys and proper disposal methods to ensure that impacts remain **less than significant**.

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?*

As the school was originally built in 1910, there is a potential for ACMs, lead-based paints or other hazardous building materials to be present on the project site. Improper disposal of these hazardous materials during construction could lead to an accident causing the release of hazardous materials into the environment. Mitigation Measure

Castilleja School Initial Study

HAZ-1 requires proper disposal methods, which would ensure that impacts would remain **less than significant**. Operation of the school does not include activities that could result in a release of hazardous materials into the environment.

- 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?*

The project site is a private school serving grades 6 through 12. The nearest off-site school is Palo Alto High School, approximately a quarter mile to the east. Additionally Stanford University is located just over a third of a mile away from the project site. Operation of the proposed project would not require the use of acutely hazardous materials beyond common household materials, such as cleaning supplies, used currently. During construction, there is a potential for hazardous building materials to be encountered, which could be released into the air and would require proper transportation and disposal off-site. Transportation and disposal of these materials would be required to comply with all local, state and federal regulations, some of which are expressed in Mitigation Measure HAZ-1. With implementation of this mitigation measure, which would ensure that appropriate measures are used to control the hazardous materials such that they are not released into the environment, students at the project site and nearby schools would not be exposed to hazardous materials, substances, or waste and this impact would be **less than significant**.

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

The project site and surrounding sites are not on the Department of Toxic Substance Control's EnviroStor list; thus, it is not expected that the project would create a significant hazard to the public or the environment (DTSC, 2016). Therefore, the project will have **no impact** related to being located on or adjacent to a known hazardous materials site.

- 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 for people residing or working in the project area?*

There are no airports within 2 miles of the project site and the site is not identified within a safety zone in the Palo Alto Airport Land Use Compatibility Plan. The Palo Alto

Castilleja School Initial Study

Airport is located approximately 2.5 miles east of the project site. Therefore, **no impact** related to safety hazards associated with aircrafts would occur.

- f) *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

The nearest private airstrip to the project site is a helipad on the Stanford Medical building approximately 1.33 miles west of the project site. The helipad is for use by emergency helicopters only. The proposed project would increase the number of students at the project site but would not change the existing land use of the site, which has served as a school since 1910. Therefore, impacts related to hazards associated with a private airstrip are **less than significant**.

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

The proposed project involves modifications to the existing school facilities at the project site. The project would increase the school's capacity but would implement Transportation Demand Management measures to ensure that the volume of AM and PM peak hour traffic trips accessing the site would not increase relative to existing conditions. The project would also alter vehicular access to the site, including access points for delivery trucks. This change in traffic patterns could interfere with emergency response or emergency evacuation plans. Therefore, this potential impact will be evaluated in the Transportation and Traffic section of the project EIR.

- h) *Would the project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?*

The project site is located in an urban area that is not identified as a high or medium fire hazard on the map in Section 18.4.2.2.3 in the Santa Clara County Hazard Mitigation Plan (Santa Clara County, 2012). Therefore, **no impact** related to fire risks would occur.

Mitigation Measures

Mitigation Measure HAZ-1: Prior to building demolition, the project applicant shall demonstrate to the satisfaction of the City of Palo Alto that a survey of the existing buildings has been conducted by a qualified environmental specialist who meets the requirements of the current U.S. Environmental Protection Agency regulations for suspected lead-containing materials (LCMs), including lead-based paint/coatings; asbestos containing materials (ACMs); and the presence of polychlorinated biphenyls

Castilleja School Initial Study

(PCBs). Any demolition activities likely to disturb LCMs or ACMs shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work. If found, LCMs and ACMs shall be disposed of properly. If PCBs are found, these materials shall be managed in accordance with the Metallic Discards Act of 1991 (California Public Resources Code, Sections 42160–42185) and other state and federal guidelines and regulations. Demolition plans and contract specifications shall incorporate any necessary abatement measures in compliance with the Metallic Discards Act, particularly Section 42175, Materials Requiring Special Handling, for the removal of mercury switches, PCB-containing ballasts, and refrigerants.

3.9 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) Would the project violate any water quality standards or waste discharge requirements?

f) Would the project otherwise substantially degrade water quality?

The project site is fully developed and the proposed project would not substantially change the amount of impervious surface area on the project site. The project site consists of 148,000 square feet of buildings and 73 surface parking stalls. The project is proposing to add 26,700 square feet of interior space (all below grade), as well as reducing surface parking to 40 surface parking stalls (while providing 130 new below grade parking stalls) and increasing open space by 6,182 square feet. This translates to a 0.06% increase of permeable surfaces. The project would not alter existing grades in the area and would not change the drainage patterns on the site or lead to increased erosion or sedimentation. The National Pollution Discharge Elimination System (NPDES) program administered by the Bay Area Regional Water Quality Control Board (RWQCB) regulates Stormwater runoff water quality to control and reduce pollutants to water bodies from surface water discharge. The RWQCB worked with cities and counties throughout the region to prepare and adopt a Regional Municipal Stormwater Permit (Regional Permit). The Regional Permit for the City identifies minimum standards required for new development and redevelopment within the City limits. Additionally, the City's standard conditions of approval include requirements for projects to develop and implement best management practices (BMPs) to control erosion during construction and permanent features to treat stormwater during project operation. The project would be required to comply with all city, state and federal standards pertaining to stormwater runoff and water quality. Therefore, impacts would be **less than significant**.

Castilleja School Initial Study

- b) *Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (i.e., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?*

As stated above in item (a), the project would slightly decrease impervious surface area, which would not substantially change the area available for groundwater recharge. The project would not rely on groundwater for its water. Therefore, the project would have no **impact** on groundwater supplies or groundwater recharge.

- 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, in a manner which would result in substantial erosion or siltation on- or off-site?*

- d) *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 substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?*

The project site is completely developed and there are no streams or rivers located on or adjacent to the project site that would be altered during project construction. The project proposes to slightly reduce the square footage of impervious surface area to the project site. The project would not substantially alter the existing drainage pattern of the site. This incremental change in impervious surface area would not substantially alter the rate or amount of runoff resulting in flooding on- or off-site or increase erosion or siltation on- or off-site. The project would have a **less than significant** impact related to alteration of the existing drainage pattern, increases in surface runoff, and potential to contribute to flooding.

- e) *Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*

The proposed project would slightly decrease impervious surface area and increase open space on the project site. This minor decrease in impervious surface area would allow for a slight decrease in the rate and volume of stormwater runoff from the site. The project would have **no impact** related to exceeding the capacity of the existing stormwater drainage system.

Castilleja School Initial Study

g) Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

The project does not propose to construct housing and is not located within a 100-year flood hazard zone (FEMA 2014). There would be **no impact** related to placing housing within a 100-year flood hazard area.

The project site is not located within a 100-year flood hazard area in the map in Section 18.4.2.2.7 in the Santa Clara County Hazard Mitigation Plan (Santa Clara County, 2012). The project is not located within a 100-year flood hazard area and would have **no impact** related to placing structures within a 100-year flood hazard area that would impede or redirect flood flows.

i) Would the project expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

The project site is not located near a levee or dam and is not within an area identified as a dam failure inundation area on the map in Section 18.4.2.2.7 in the Santa Clara County Hazard Mitigation Plan (Santa Clara County, 2012). The project site is not subject to flooding and construction of the project would result in **no impact** associated with exposure of people to flood-related hazards.

j) Inundation by seiche, tsunami, or mudflow?

The project site is located in Palo Alto on relatively flat ground and is not within close proximity to an open body of water or a hillside; therefore, there is no risk for seiche, tsunami, or mudflow hazards. **No impacts** related to these hazards would result from implementation of the proposed project.

Castilleja School Initial Study

3.10 Land Use and Planning

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
X. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project physically divide an established community?*

b) *Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

Figure 4 identifies the Comprehensive Plan land use designations and zoning designations for the project site and surrounding properties. The proposed project has the potential to have significant impacts related to compatibility with neighboring land uses and thus land use impacts will be analyzed in the project EIR.

c) *Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?*

There are no adopted Habitat Conservation Plans or Natural Community Conservation Plans within the City of Palo Alto. Therefore, the project would have **no impact** related to conflict with the provisions of such plans.

Mitigation Measures

No mitigation measures are necessary.

Castilleja School Initial Study

3.11 Mineral Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?

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?

The project site is designated Single Family Residential by the Palo Alto General Plan and has been used as the site for the Castilleja girls' school since 1910. There are no known mineral resources within the project site and no mineral recovery activities have been known to occur on site. The proposed modifications to the existing facilities on the project site would not adversely affect any mineral resources of value to the state or region. The project would have **no impact** related to mineral resources.

Mitigation Measures

No mitigation measures are necessary.

3.12 Noise

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE – Would the project result in:				
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) *Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

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

c) *Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?*

d) *Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

The proposed project has the potential to have significant noise impacts and thus noise impacts will be analyzed in the project EIR.

e) *Would the project be 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 expose people residing or working in the project area to excessive noise levels?*

f) *Would the project be within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?*

Castilleja School Initial Study

The proposed project is not located within an airport land use plan or within two miles of a public or private airport/airstrip, other than the emergency helipad at the Stanford Medical building approximately 1.33 miles from the project site. The proposed modifications to the existing facility at the project site would result in **no impacts** associated with exposure to noise from airports and airstrips.

3.13 Population and Housing

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. POPULATION AND HOUSING – Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/> <input checked="" type="checkbox"/>

- a) *Would the project induce substantial 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)?*

The proposed project would increase the school’s student capacity and is expected to require a slight increase in school staff. However, the project would not construct new housing, would not generate a substantial number of new jobs, and would not extend new roads or infrastructure to the site or any adjacent undeveloped or underdeveloped areas. Thus, the project would be unable to encourage further growth, neither directly nor indirectly. Thus, the project would have **no impact**.

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

- c) *Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

The proposed project ~~does not involve the~~ includes demolition of two residential structures that are on property owned by Castilleja School Foundation. One of these structures is the Lockey Alumni House; it is used for school programs and functions and does not provide any housing. The other structure has been used in recent years as rental housing. –and thus– Demolition of this structure would will not displace any rental occupants that are currently leasing the house, and would remove one housing unit from the City’s inventory. people or housing. Thus, the project will have no impact. This is

Castilleja School Initial Study

considered a less than significant impact to the environment because demolition of a single dwelling unit would not substantially alter the housing supply within the City of Palo Alto.

3.14 Public Services

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. PUBLIC SERVICES				
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:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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:*

Fire protection? Police protection?

The project site currently operates as a private school and receives services from the City Fire and Police Departments. The project would add approximately 26,700 square feet to the project site and increase enrollment by 102 students but would not cause a substantial increase in the population that would demand additional service. The project would have a **less than significant** impact on the provision of fire protection and police services.

Schools?

The project would expand an existing school but would not generate a new population that would increase the demand for local schools; in fact, the proposed expansion of the school would allow for an increase in enrollment at the campus of 102 new students. Therefore, the project would have **no impact** on other schools in the area.

Parks?

The project would not generate a new population that would increase the demand for local parks. Expanding the school would allow the facility to increase enrollment by 102 students. This would not cause a substantial increase in the population that would require parks. Furthermore, the school provides its own range of recreational and open space

Castilleja School Initial Study

services for its students. The City’s standard conditions of approval require fees to address any increased need for parks. Payment of the development fees for parks would ensure that the project’s impact is **less than significant**.

Other public facilities?

The project would not generate a new population that would increase the demand for other public facilities. The City’s standard conditions of approval require fees to address any increased need for community facilities. Payment of development fees for community facilities and libraries would ensure that the project’s impact on these services is **less than significant**.

3.15 Recreation

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. RECREATION				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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?*

The proposed project includes its own recreation areas to support the students living and attending the school. The reconfiguration of the campus and recreational facilities is included in the proposed project and the environmental impacts associated with this reconfiguration are discussed in the corresponding sections of this Initial Study and will be addressed in the individual chapters of the project EIR. As the school would provide its own recreation areas, there would be **no impact** on existing neighborhood and regional parks.

Castilleja School Initial Study

3.16 Transportation and Traffic

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION/TRAFFIC – Would the project:				
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?*

b) *Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?*

Castilleja School Initial Study

- c) *Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?*
- d) *Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*
- e) *Would the project result in inadequate emergency access?*
- f) *Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?*

The proposed project has the potential to have significant impacts and thus Traffic and Transportation impacts will be analyzed in the project EIR.

3.17 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. TRIBAL CULTURAL RESOURCES				
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:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) A resource determined by the lead agency, in its discretion and supported by substantial 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Castilleja School Initial Study

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:*

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

b) *A resources determined by the lead agency, in its discretion and supported by substantial 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 Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

Although no Native American tribes that are traditionally and culturally affiliated with the project area have requested notification from the City of Palo Alto regarding proposed projects, analysis of the potential for the project to have significant impacts to Tribal Cultural Resources will be analyzed in the project EIR.

3.18 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Castilleja School Initial Study

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS – Would the project:				
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) *Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*
- b) *Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*
- e) *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?*

Wastewater from the project site is treated at the Regional Water Quality Control Plant owned and operated by the City. The Regional Water Quality Control Plant is permitted under NPDES permit No. CA0037834. Wastewater flows on the project site are treated at the Regional Water Quality Control Plant in accordance with the NPDES permit. The project would expand the existing school, allowing for enrollment of an additional 102 students. The project would also replace four existing buildings with one new structure. The new building would include water-efficient toilets and faucets to help reduce on-site water consumption and wastewater generation. The expanded school would connect to existing wastewater infrastructure and all flows would be directed to the Regional Water Treatment Plant. The project applicant would be required to submit calculations prepared by a registered engineer to show that the on-site and off-site sewer systems are capable of serving the needs of the development and adjacent properties, prior to issuance of building permits. This would ensure that sufficient wastewater infrastructure and capacity exists to serve the projected demand and this impact would be **less than significant**.

Castilleja School Initial Study

- c) *Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

The expansion of the existing school would not require additional stormwater infrastructure. The project would decrease impervious surface area on the project site by 0.06 percent, which would result in a slight reduction in the rate and volume of stormwater runoff. The project would not require construction or expansion of existing facilities. The project would be adequately served by existing infrastructure and the impact would be **less than significant**.

- d) *Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

Expanding the existing school would slightly increase water demand at the project site. The project would replace older fixtures with newer water efficient fixtures, which would reduce the project's water demand. Additionally, standard conditions of approval require the applicant to submit calculations by a registered civil engineer to show that the on-site and off-site water systems are capable of serving the needs of the development and adjacent properties during peak flow demands. This would ensure that sufficient water supply is available to serve the project site and the impact would be **less than significant**.

- f) *Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

The expansion of the existing school would not generate an additional population that would generate additional solid waste. Waste generated in the City is sent to the Sunnyvale Material Recovery Transfer station and ultimately the Kirby Canyon Landfill (Permit 43-AN-0008). The Kirby Canyon Landfill can accept 2,600 tons per day and has a remaining capacity of 16,191,600 cubic yards (CalRecycle 2015). The project's current solid waste generation is adequately served by the landfill and the project's solid waste generation is not expected to change substantially as a result of the proposed project. Therefore, the project would have a **less-than-significant** impact.

- g) *Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

The project would be required to comply with the green building requirements set forth in the Green Building programs required by the State of California and the City of Palo Alto. The project is proposed to attain a LEED Silver certification. This would ensure that water conservation and solid waste reduction measures are included in the project

Castilleja School Initial Study

and that the project meets all local, state and federal regulations related to solid waste. Therefore, impacts would be **less than significant**.

3.19 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE				
a) Does the project have the potential to 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, 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) *Does the project have the potential to 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, 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?*

The proposed project has the potential to have significant impacts as identified throughout this Initial Study. These potentially significant impacts will be analyzed in

Castilleja School Initial Study

the project EIR. Cumulative impacts will be discussed within the appropriate chapters; all impact discussions will include both direct and indirect effects.

4 REFERENCES AND PREPARERS

4.1 References Cited

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4.2 List of Preparers

DUDEK
853 Lincoln Way, Suite 208
Auburn, California 95603

Katherine Waugh, AICP, Senior Project Manager
Kimberly Asbury, Environmental Analyst

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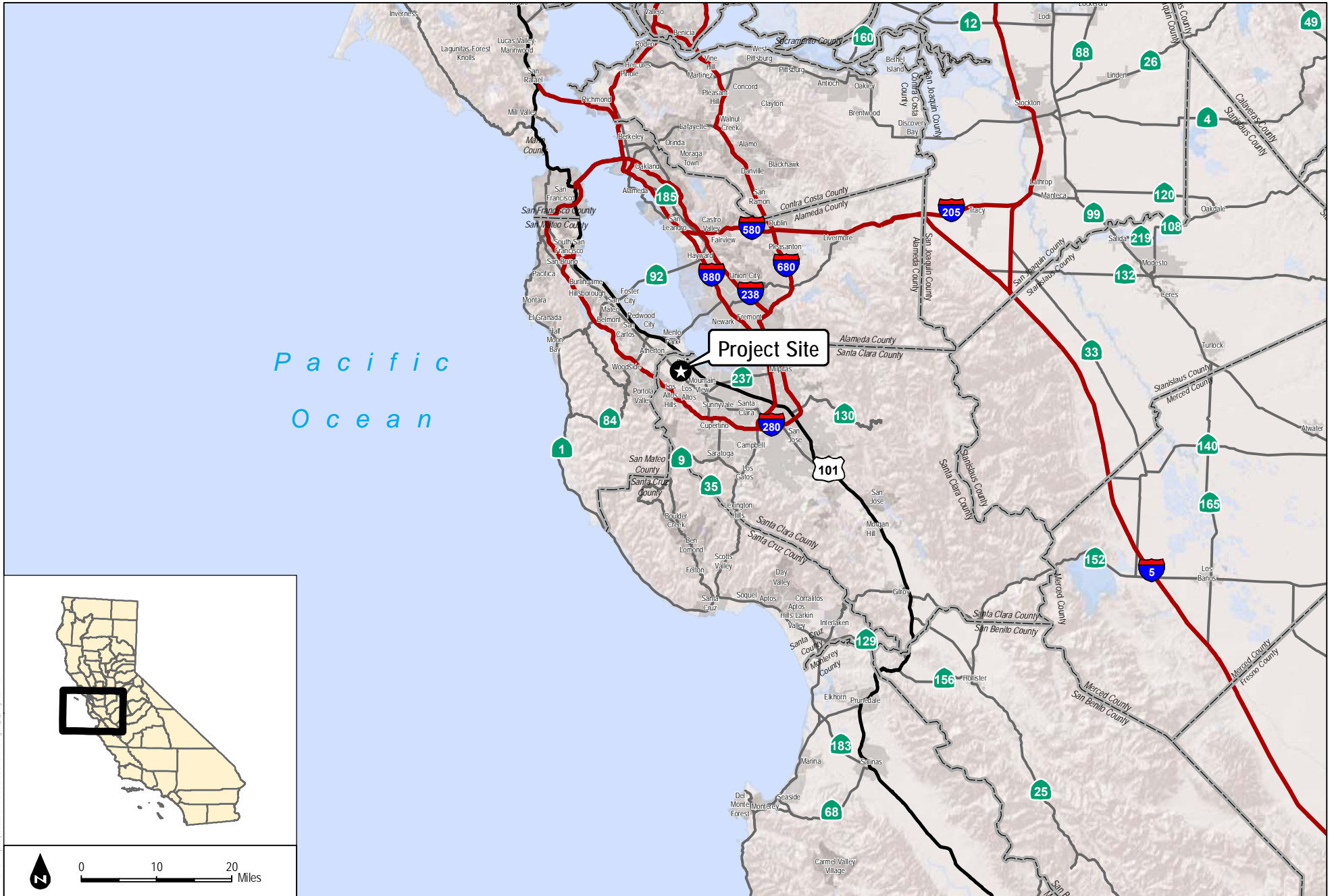
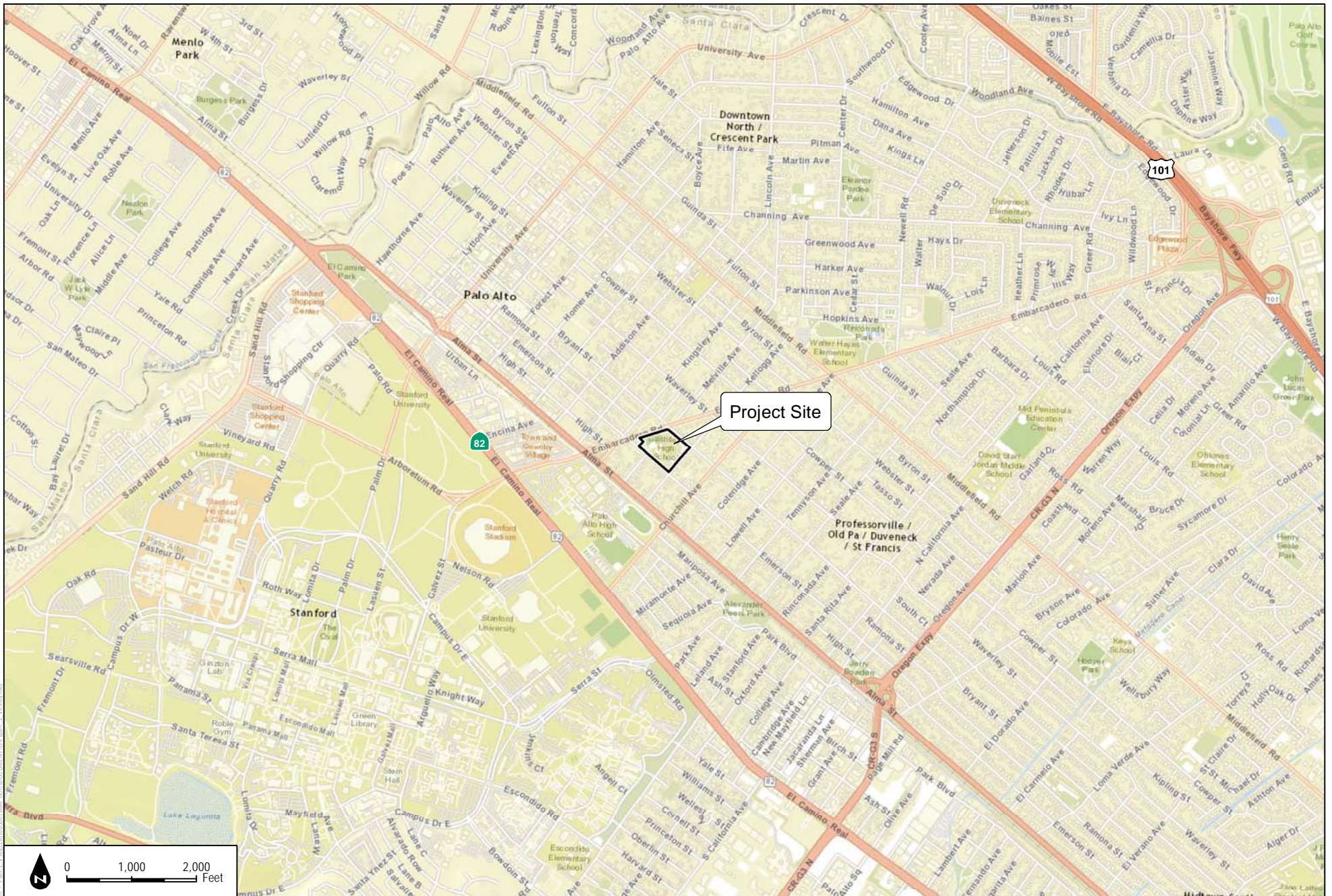


FIGURE 1
Regional Map

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SOURCE: ESRI 2015

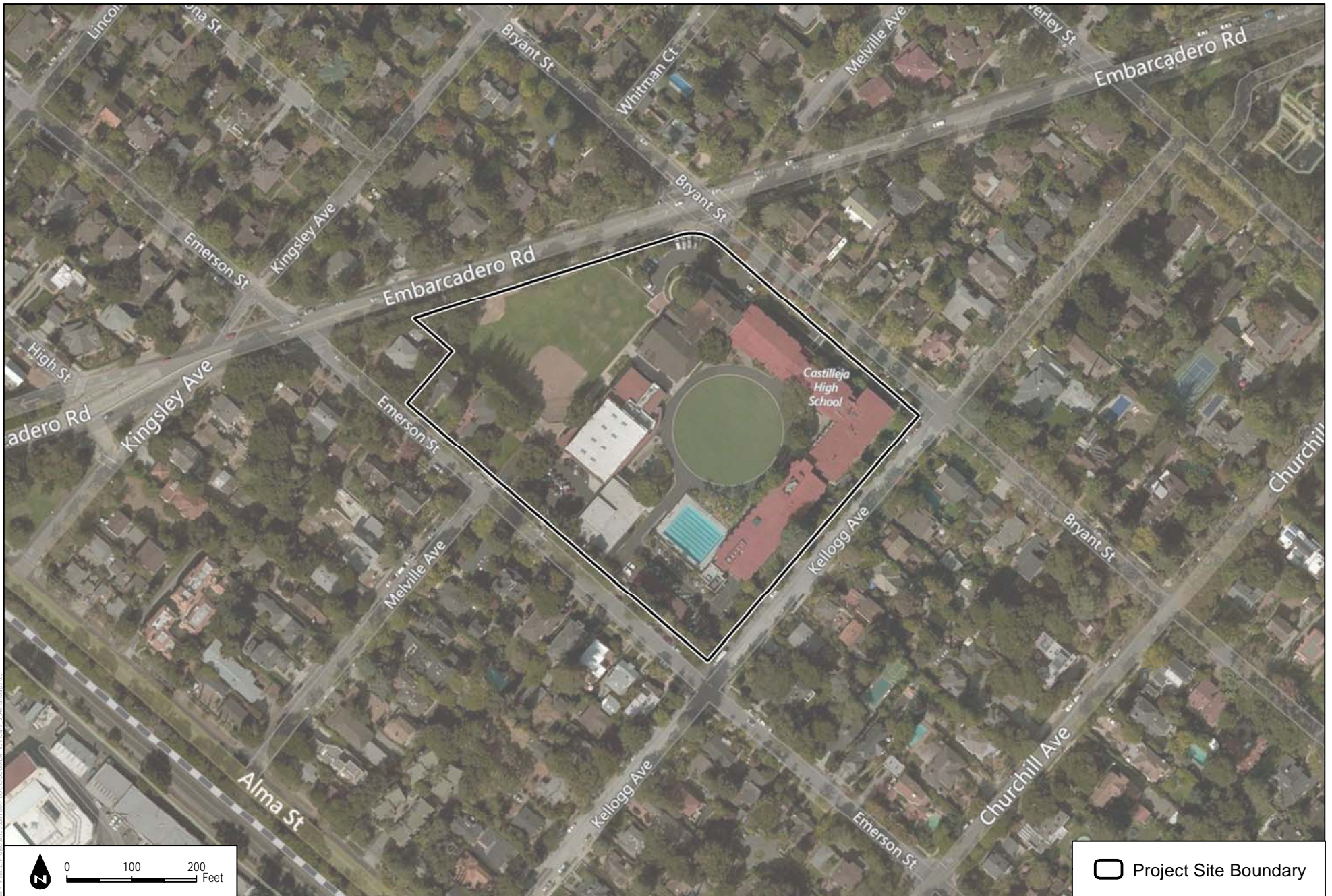


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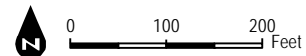
Figure 2
Vicinity Map

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Project Site Boundary



SOURCE: Bing Maps 2015

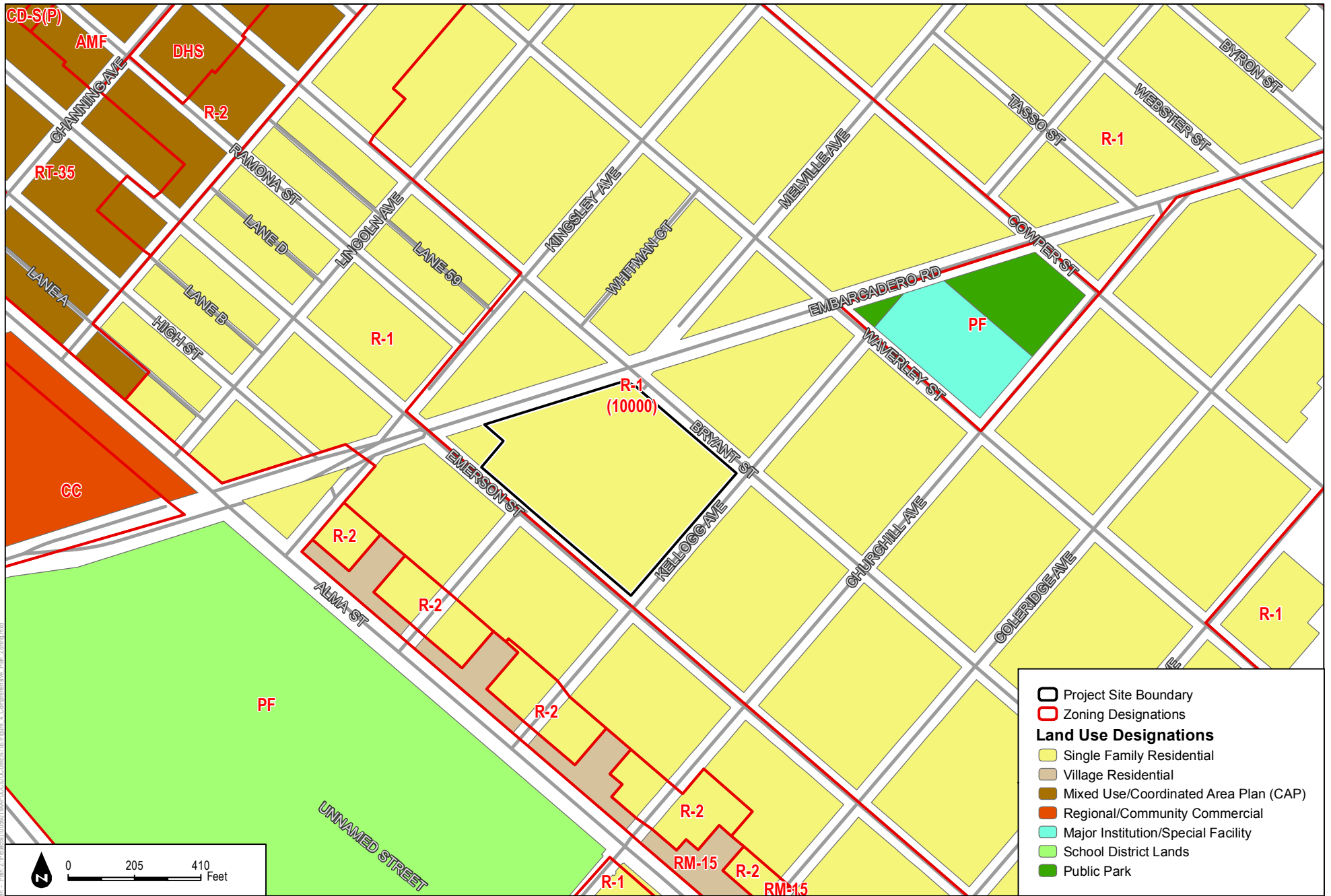
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Figure 3
Aerial Map

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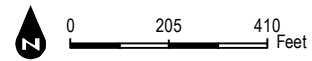
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Project Site Boundary
 Zoning Designations

Land Use Designations

- Single Family Residential
- Village Residential
- Mixed Use/Coordinated Area Plan (CAP)
- Regional/Community Commercial
- Major Institution/Special Facility
- School District Lands
- Public Park



SOURCE: City of Palo Alto

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Figure 4
Land Use and Zoning Designations

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