

San Mateo County Community College District
College of San Mateo Building 20 Demolition
Final Subsequent Environmental Impact Report
Findings of Fact for the College of San Mateo

I. INTRODUCTION

A. CEQA Process

The San Mateo County Community College District (District) analyzed the proposed demolition of Building 20 at the College of San Mateo (Project Change) on the basis of the California Environmental Quality Act (CEQA, Public Resources Code Section 21000 et seq.) and the State CEQA Guidelines (14 CCR 15000, et seq.) and prepared a Subsequent Environmental Impact Report (SEIR) disclosing the significant environmental impacts of the Project. The SEIR is based upon the certified *San Mateo Community College District 2015 Facilities Master Plan Amendment Final Environmental Impact Report* (2015 Certified EIR). The Final SEIR prepared by the District determined that the Project could have potentially significant effects on the environment. With the exception of air quality impact CSM-AQE-5, described below, all of the impacts can be reduced below the level of significance by mitigation measures.

Consistent with CEQA's requirements, the Draft SEIR was circulated for a public comment period beginning on July 24, 2018 and ending on September 10, 2018. All written comments received during the public comment period were responded to in Chapter 3 of the Final SEIR.

Prior to approving the Project, the District's Board of Trustees (Board) will certify that it has considered the Final SEIR, that the Final SEIR adequately meets the requirements of CEQA, and the Final SEIR reflects the independent judgment of the Board. Upon approving the Project, the Board will adopt the following findings of fact regarding the significant effects and the alternatives identified in the Final SEIR. The Final SEIR concluded that there would be a significant and unavoidable environmental impact on air quality during the Project's construction. Accordingly, the Board will adopt a Statement of Overriding Considerations describing the Project benefits that outweigh this impact.

The SEIR included revisions to some mitigation measures for CSM in the 2015 Certified EIR as well as new mitigation measures to reduce potentially significant environmental impacts related to the Project Change to a less-than-significant level. Accordingly a revised mitigation monitoring and reporting program (MMRP) was prepared. Pursuant to Public Resources Code (PRC) Section 21081.6, the Board is also adopting the revised MMRP for the mitigation measures that are the Board's responsibility to implement. The revised MMRP establishes a program to ensure that the adopted mitigation measures identified in the Final SEIR will be implemented, as amended by the Final SEIR.

B. Environmental Impact Report (EIR)

The SEIR evaluates the potential for the proposed demolition of Building 20 to result in significant effects on the environment that were not disclosed in the 2015 Certified EIR. In accordance with CEQA Guidelines Section 15091, the Board is adopting the following findings. In addition, it is adopting a revised MMRP to monitor the mitigation measures incorporated to avoid or substantially lessen significant environmental effects to ensure they will be implemented.

C. Record of Proceedings

For the purposes of CEQA, and the findings herein set forth, the administrative record for the Project consists of those items listed in Public Resources Code section 21167.6, subdivision (e). The record of proceedings for the District's decision on the Project can be reviewed at the District's office. Pursuant to Guidelines section 15091(e), the administrative record of these proceedings is located, and may be obtained there. The custodian of the record is Mitchell Bailey, Chief of Staff.

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D. Overview of the Project

The San Mateo County Community College District (District) certified a Final Environmental Impact Report (2015 Certified EIR, State Clearinghouse #2015052007) for the 2015 Facilities Master Plan Amendment Project, which updated the planned improvements at each of the District's three campuses, including College of San Mateo (CSM). The 2015 Certified EIR evaluated a number of improvements at CSM, including the construction of new Buildings 8 (Gymnasium) and 19 (Emerging Technologies), and the demolition of existing Buildings 8 (Gymnasium), 12 (East Hall), and 19 (Emerging Technologies). The Facilities Master Plan Amendment Project also included the repair and repaving of the campus perimeter road, pedestrian path, and the implementation of landscape and hardscape improvements. These improvements were analyzed at a program level in the 2015 Certified EIR based on conceptual design elements such as general use types and development envelopes. The proposed demolition of the Building 20 Complex buildings and their replacement with a single surface parking lot (Project Change) was not evaluated in the 2015 Certified EIR. Accordingly, the Project Change is evaluated in the SEIR.

As discussed in Chapter 1, *Introduction*, of the SEIR, the Building 20 Demolition Project, or Project Change, is a change to the Facilities Master Plan Amendment Project analyzed in the 2015 Certified EIR. The 2015 EIR did not evaluate any changes to the Building 20 complex site because the Building 20 project was under litigation at the time. The previous litigation involved an Addendum for the Building 20 project that tiered from a 2006 Mitigated Negative Declaration (MND). These documents are separate from the 2015 EIR, and the Court of Appeal's ruling on the 2011 Addendum (see *Friends of the College of San Mateo Gardens v. San Mateo Community*

College District (2017) 11 Cal.App.5th 596) has no bearing on the 2015 EIR.

The Project Change would entail demolishing all existing structures and vegetation within the Building 20 Complex (Project Change Site) and replacing them with a single surface parking lot containing up to 208 uncovered parking stalls, along with attendant landscaping, lighting, signage, storm drainage, and security improvements. The Project Change would provide Americans with Disabilities Act (ADA)-accessible parking, direct access, and loading space for the new Building 19, Emerging Technologies, evaluated in the 2015 Certified EIR, as well as provide parking options for the much-utilized nearby Building 10 for students, employees, and the community/visitors. The Project Change is also needed as an adjacent construction staging site during the construction of the new Building 19.

The District has identified the following objectives for the Project:

- Provide parking, direct access, and loading space for the new Building 19, Emerging Technologies.
- Provide a staging area for the construction of the new Building 19, Emerging Technologies, that is adequately sized and located so as to minimize environmental impacts and disruptions to ongoing campus activities during Building 19 construction.
- Expand parking options on the east side of the campus to better serve current students, staff, and the community/visitors who access much-utilized facilities such as Building 10.
- Improve access for disabled persons.
- Ensure safety of students and faculty by removing unsafe structures.

II. FINDINGS REQUIRED UNDER CEQA

A. Explanation of Findings

Prior to approval of a project, the Final SEIR must be certified pursuant to Section 15090 of the CEQA Guidelines. When a certified Final EIR identifies one or more significant environmental impacts, the approving agency must make one or more of the following findings, accompanied by a brief explanation of the rationale for each identified significant impact (Section 15091 of the CEQA Guidelines):

- a. Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.
- b. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency, or can and should be adopted by such other agency.
- c. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the environmental impact report.

By way of explanation: finding a. is used when the lead agency is adopting a mitigation measure to address the Project's significant impacts; finding b. is used when another agency (i.e., a responsible agency) has responsibility for adopting the mitigation measure; and finding c. is used when either a mitigation measure or an alternative identified in the Final EIR is rejected as infeasible. No findings are required for impacts that are less than significant and require no mitigation. Section 15092 of the CEQA Guidelines states that after consideration of a Final EIR, and in conjunction with making the Section 15091 findings identified above, as well as a statement of overriding considerations where necessary under Section 15093, the lead agency may approve the project.

These findings constitute the District's best efforts to set forth the evidentiary and policy bases for its decision to approve the Project in a manner consistent with the requirements of CEQA. To the extent that these findings conclude that various proposed mitigation measures outlined in the Final EIR are feasible, the District hereby binds itself to implement these measures. These findings, in other words, are not merely informational, but rather constitute a binding set of obligations that will come into effect when the District adopts a resolution approving the Project.

These findings summarize the impacts and mitigation measures identified in the SEIR. The full descriptions of the following impacts and mitigation measures are contained in the Final SEIR for the Project. The descriptions are incorporated herein by reference.

B. Adopted Findings on Environmental Impacts

Aesthetics

Impact CSM-AES-1: Result in temporary visual impacts caused by construction activities.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-AES-1: Limit exterior construction activities to daylight hours at the College of San Mateo within 0.25 mile of residences.

CSM-AQE-5: Implement BAAQMD basic construction mitigation measures to reduce construction-related PM10 and PM2.5 dust at the College of San Mateo.

Limiting construction that is within the viewline of nearby residences to daylight hours avoids the use of lights that at night might otherwise be visually intrusive. Ensuring that the Project Change will not raise dust during construction will avoid a visual impact.

Impact CSM-AES-2: Substantially degrade the existing visual character or quality of the site and its surroundings, including views from scenic vistas.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level.

CSM-AES-2: Relocate unique botanical specimens on the Building 20 Complex at CSM.

CSM-AES-3: Relocate existing commemorative plaques.

These measures reduce below a level of significance the aesthetic effect of removing unique plantings from the Project Change Site by preserving to the extent feasible unique visual resources and enhancing landscaping throughout the campus with these botanical specimens.

Impact CSM-AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. The measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project, as amended by the Project Change.

CSM-AES-4: Apply minimum lighting standards at the College of San Mateo.

Measure CSM-AES-4 establishes specific requirements to minimize lighting at night when buildings are empty and to minimize the effects of outdoor lighting by specifying types of lighting and shielding requirements.

Air Quality and Energy

Impact CSM-AQE-2: Violate a BAAQMD air quality standard or substantially contribute to an existing or projected air quality violation during Project construction.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following five mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project, as amended by the Project Change.

CSM-AQE-1: Implement BAAQMD basic construction mitigation measures to reduce construction-related NO_x emissions at the College of San Mateo.

CSM-AQE-2: Implement BAAQMD additional construction mitigation measures to reduce construction-related NO_x emissions at the College of San Mateo.

CSM-AQE-3: Utilize clean diesel-powered equipment during construction to control construction-related DPM emissions at the College of San Mateo.

CSM-AQE-4: Offset NO_x emissions generated during construction to quantities below applicable BAAQMD CEQA thresholds at the College of San Mateo.

CSM-AQE-5: Implement BAAQMD basic construction mitigation measures to reduce construction-related PM₁₀ and PM_{2.5} dust at the College of San Mateo.

Measure CSM-AQE-1 will ensure that the construction contractor implements the basic control measures to reduce NO_x emissions from construction equipment that are recommended by the Bay Area Air Quality Management District (BAAQMD). Measure CSM-AQE-2 requires the construction contractor implement the additional NO_x emissions control measures promulgated by BAAQMD to avoid a significant emission impact. Measure CSM-AQE-3 requires the use of Tier 4 engines for construction equipment, thereby reducing the Diesel Particulate Matter (DPM), Reactive Organic Gases (ROG), and NO_x emissions that would otherwise come from construction equipment. Measure CSM-AQE-4 measure commits the District to entering into a development mitigation contract with BAAQMD in order to reduce criteria pollutant emissions generated during construction of the Project to quantities below the numeric BAAQMD thresholds. The measure identifies specific contents of the contract to ensure that the offsets will be real. Together, measures CSM-AQE-1 through CSM-AQE-4 will maintain potential NO_x emissions below the threshold level. Measure CSM-AQE-5 specifies the actions that the District will undertake to meet the BAAQMD's reduction standards. These will ensure that the Project, as amended by the Project Change, does not exceed BAAQMD thresholds for particulate matter emissions.

Impact CSM-AQE-4: Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The BAAQMD thresholds for criteria pollutants are thresholds for both individual impacts and for the level at which an individual impact would be cumulatively considerable. The Board has adopted the following five mitigation measures which reduce the impact to a less than significant level.

CSM-AQE-1: Implement BAAQMD basic construction mitigation measures to reduce construction-related NO_x emissions at the College of San Mateo.

CSM-AQE-2: Implement BAAQMD additional construction mitigation measures to reduce construction-related NO_x emissions at the College of San Mateo.

CSM-AQE-3: Utilize clean diesel-powered equipment during construction to control construction-related DPM emissions at the College of San Mateo.

CSM-AQE-4: Offset NO_x emissions generated during construction to quantities below applicable BAAQMD CEQA thresholds at the College of San Mateo.

CSM-AQE-5: Implement BAAQMD basic construction mitigation measures to reduce construction-related PM₁₀ and PM_{2.5} dust at the College of San Mateo.

These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project, as amended by the Project Change. The measures reduce this impact in the manner discussed in Impact CSM-AQE-2 above so that the Project, as amended by the Project Change, will not make a cumulatively considerable contribution to the air basin's non-attainment.

Impact CSM-AQE-5: Expose existing sensitive receptors to substantial pollutant concentrations during construction.

Findings:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report. Even so, the effect will remain significant and unavoidable, as the changes or alterations may not reduce the effect to a less than significant level.

Supporting Evidence:

The Board has adopted the following four mitigation measures to reduce this temporary impact, but not to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project.

CSM-AQE-2: Implement BAAQMD additional construction mitigation measures to reduce construction-related NO_x emissions at College of San Mateo.

CSM-AQE-3: Utilize clean diesel-powered equipment during construction to control construction-related DPM emissions at College of San Mateo.

CSM-AQE-5: Implement BAAQMD basic construction mitigation measures to reduce construction-related PM₁₀ and PM_{2.5} dust at College of San Mateo.

CSM-AQE-6: Install filtration systems on ventilation and recirculation systems at the College of San Mateo and at off-site receptors over BAAQMD PM 2.5 thresholds during construction.

Measure CSM-AQE-2 requires the construction contractor implement the additional NO_x emissions control measures promulgated by BAAQMD. Measure CSM-AQE-3 requires the use of Tier 4 engines for construction equipment, thereby reducing DPM, ROG, and NO_x emissions that would otherwise come from construction equipment. Measure CSM-AQE-5 specifies the measures that the District will undertake to meet the BAAQMD's reduction standards, thereby ensuring that the Project does not exceed BAAQMD thresholds for particulate matter emissions. Measure CSM-AQE-6 will require the District to install filtration systems on ventilation and recirculation systems within onsite residences where the BAAQMD PM_{2.5} concentration thresholds are exceeded after application of other onsite construction air quality mitigation measures. The measure specifies the minimum quality filter required and provides for future maintenance to ensure that filtration continues as long as necessary.

With these mitigation measures, this impact would be less than significant at onsite receptors and would be below the threshold at offsite receptors but would remain significant and unavoidable at offsite receptors. Specifically, impacts at offsite receptors would remain significant and unavoidable at a park and some offsite receptors either may not be able to install filtration systems or may not agree to the installation of filtration systems and the District does not have the legal authority to require offsite receptors to install the filtration systems or to otherwise comply with the provisions of CSM-AQE-6. It is outside the District's jurisdiction and control to address offsite construction impacts as there are no alternative mitigation measures that are feasible to reduce PM 2.5 emissions during construction.

Biological Resources

Impact CSM-BIO-1: Impact special-status plant species.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-BIO-1: Implement special-status plant species avoidance and revegetation measures at the College of San Mateo.

Measure CSM-BIO-1 will require the District to retain a qualified botanist to undertake a blooming season survey of any areas of proposed construction disturbance that contain suitable habitat for western leatherwood, fragrant fritillary, congested-headed hayfield tarplant, Choris' popcornflower, and showy Ranheria clover. The surveys will be conducted in accordance with CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. If any such plants are encountered, the District would prepare a revegetation and monitoring plan as specified in this measure. The plan includes performance measures to ensure successful revegetation.

Impact CSM-BIO-2: Impact special-status bird species.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-BIO-2: Implement white-tailed kite and other nesting bird avoidance measures at the College of San Mateo.

This measure includes requirements that avoid conflicts with nesting birds. It will require that prior to any construction activities scheduled during the bird nesting season (February 1 to August 31), the District retain a qualified wildlife biologist to conduct preconstruction surveys for nesting birds, including raptors. The measure establishes requirements for avoidance including the removal of nonactive nests outside of the nesting season and, if active nests are found on the building or in the affected area, a halt to demolition until the biologist verifies that all nests on the building are inactive.

Impact CSM-BIO-3: Impact special-status bats.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-BIO-3: Implement fringed myotis, pallid bat, and hoary bat avoidance measures at the College of San Mateo.

This measure includes requirements that avoid conflicts with roosting bats. It will require that prior to any construction activities at sites offering suitable bat roosting habitat, the District retain a qualified wildlife biologist to conduct preconstruction surveys for fringed myotis, pallid bat, and hoary bat. The measure prescribes specific avoidance and minimization measures that will be refined in coordination with the California Department of Fish and Wildlife to ensure their effectiveness.

Impact CSM-BIO-4: Impact native wildlife nursery sites.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-BIO-2: Implement white-tailed kite and other nesting bird avoidance measures at the College of San Mateo.

This will require that prior to any construction activities scheduled during the bird nesting season (February 1 to August 31), the District retain a qualified wildlife biologist to conduct preconstruction surveys for nesting birds, including raptors. The measure establishes requirements for avoidance including the removal of nonactive nests outside of the nesting season and, if active nests are found on the building or in the affected area, a halt to demolition until the biologist verifies that all nests on the building are inactive.

Cultural Resources

Impact CSM-CUL-2: Cause a substantial adverse change in the significance of an archaeological resource as defined in Section 15064.5.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-CUL-1: Stop work if cultural resources are encountered during ground-disturbing activities at the College of San Mateo.

This measure will ensure the construction specifications include a stop work order if prehistoric or historic-period cultural materials are unearthed during ground-disturbing activities, until a qualified archaeologist and Native American representative can assess the significance of the find. Where the find is significant, the archaeologist, in consultation with the Native American representative, will develop a treatment plan that could include site avoidance, capping, or data recovery.

Impact CSM-CUL-3: Disturb any human remains, including those interred outside of formal cemeteries.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-CUL-2: Stop work if human remains are encountered during ground-disturbing activities at the College of San Mateo.

This measure will ensure the construction specifications include a stop work order if human remains are discovered during construction or demolition. It will require that any remains be treated in accordance with Section 7050.5(b) of the California Health and

Safety Code. That code includes specific requirements for the proper treatment of Native American remains.

Geology, Soils, and Paleontology

Impact CSM-GEO-2: Expose people or structures to strong seismically-induced groundshaking.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-GEO-1: Prepare a site-specific geotechnical investigation for all structures to be occupied by humans at the College of San Mateo and comply with recommendations.

This measure will require the District to have a qualified engineer prepare design-level geotechnical investigations for each Project element involving human occupation. The geotechnical investigation report will include recommendations to ensure the building is designed in accordance with the specifications of CGS Special Publication 117, *Guidelines for Evaluating and Mitigating Seismic Hazards*, and the requirements of the Seismic Hazards Mapping Act, which will minimize the structural damage and risk to humans from seismically induced groundshaking.

Impact CSM-GEO-5: Result in loss of topsoil as a result of Project construction and operation.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-GEO-2: Stockpile topsoil removed during construction at the College of San Mateo and reuse stockpiled topsoil during revegetation.

Under this measure, the contractor(s) retained for construction and revegetation of the Project will stockpile excavated topsoil on disturbed areas within the campus boundaries (e.g., parking lot expansion areas) so that it can be reused for revegetation on the campus as needed. To ensure maximum topsoil recovery, topsoil will be stockpiled separately from other excavated materials and covered. Revegetation and landscaping will use stockpiled topsoil.

Impact CSM-GEO-7: Increase risk of damage to Project structures as a result of Project location on expansive soils.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-GEO-1: Prepare a site-specific geotechnical investigation for all structures to be occupied by humans at the College of San Mateo and comply with recommendations.

This measure will require the District to have a qualified engineer prepare design-level geotechnical investigations for each Project element involving human occupation. The geotechnical investigation report will include recommendations to ensure the site is prepared prior to construction and the building is designed to minimize the structural damage and risk to humans from expansive soils.

Greenhouse Gases

Impact CSM-GHG-1: Generate GHG emissions during project construction.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-GHG-1: Where feasible, implement BAAQMD's best management practices for GHG emissions at College of San Mateo.

CSM-AQE-5: Implement BAAQMD basic construction mitigation measures to reduce construction-related PM10 and PM2.5 dust at College of San Mateo.

Measure CSM-GHG-1 will require all construction contractors to implement the BAAQMD-recommended best management practices to reduce GHG emissions. These include using alternative-fueled (e.g., biodiesel, electric) construction vehicles/equipment in at least 15% of the fleet, using at least 10% local building materials, and recycling at least 50% of construction waste or demolition materials. Measure CSM-AQE-5 specifies the measures that the District will undertake to meet the BAAQMD's particulate matter reduction standards. Actions taken under this measure, such as limited construction vehicle speed, have the benefit of also reducing GHG emissions.

Hazards and Hazardous Materials

Impact CSM-HAZ-1: Cause a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during Project construction or from Project operation.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-HAZ-1: Prepare and implement a Spill Prevention, Control, and Countermeasure Program for construction activities at the College of San Mateo.

Under this measure, the contractors will develop (subject to District review and approval) and implement a spill prevention, control, and countermeasure program (SPCCP) to minimize the potential for and effects from spills of hazardous, toxic, or petroleum substances during construction and demolition activities. The SPCCP will be completed before any construction or demolition activities begin. The measure includes performance standards for the treatment of any reportable spill to ensure that impacts will be kept below a level of significance.

Impact CSM-HAZ-2: Cause 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 during Project construction.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-HAZ-2: Prepare a site safety plan (soil and groundwater management plan) to protect people from residual soil/groundwater contamination during construction at the College of San Mateo.

CSM-HAZ-3: Implement measures to protect people from exposure to lead and asbestos in buildings during building renovation or demolition activities at the College of San Mateo.

Measure CSM-HAZ-2 requires the construction specifications to include specific performance standards to protect construction workers and/or the public from known or previously undiscovered soil and groundwater contamination during construction activities. Prior to excavation, a Site Safety Plan (soil and groundwater management plan) will be prepared, as specified in the measure. Measure CSM-HAZ-3 provides that to protect construction workers and the public from known or undiscovered hazardous building materials, including asbestos and lead, all demolition activities will be undertaken in accordance with the California Occupational Safety and Health Administration standards contained in Title 8 of the California Code of Regulations.

Impact CSM-HAZ-4: Emit or involve handling of hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following three mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-HAZ-1: Prepare and implement a Spill Prevention, Control, and Countermeasure Program for construction activities at the College of San Mateo.

CSM-HAZ-2: Prepare a site safety plan (soil and groundwater management plan) to protect people from residual soil/groundwater contamination during construction at the College of San Mateo.

CSM-HAZ-3: Implement measures to protect people from exposure to lead and asbestos in buildings during building renovation or demolition activities at the College of San Mateo.

Under measure CMS-HAZ-1, the contractors will develop (subject to District review and approval) and implement a spill prevention, control, and countermeasure program to minimize the potential for and effects from spills of hazardous, toxic, or petroleum substances during construction and demolition activities. The SPCCP will be completed before any construction or demolition activities begin. The measure includes performance standards for the treatment of any reportable spill to ensure that impacts will be kept below a level of significance. Measure CMS-HAZ-2 requires the construction specifications to include specific performance standards to protect construction workers and/or the public from known or previously undiscovered soil and groundwater contamination during construction activities. Prior to excavation, a Site Safety Plan (soil and groundwater management plan) will be prepared, as specified in the measure. Measure CMS-HAZ-2 provides that all demolition activities will be undertaken in accordance with the California Occupational Safety and Health Administration standards contained in Title 8 of the California Code of Regulations. This will protect construction workers and the public from known or undiscovered hazardous building materials, including asbestos and lead.

Impact CSM-HAZ-6: Interfere with adopted emergency response plan or emergency evacuation plan.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-TRA-1: Implement a Traffic Control Plan during construction at the College of San Mateo.

This measure will require the construction contractor(s) to develop a traffic control plan, consistent with the performance measures set out in the mitigation measure, to minimize the effects of construction traffic on the surrounding area. The plan will be subject to review and approval by the District.

Impact CSM-HAZ-7: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-HAZ-4: Comply with legal requirements for fire prevention during construction activities at the College of San Mateo.

CSM-HAZ-5: Create and maintain adequate firebreaks and practice fire prevention at the College of San Mateo.

Measure CSM-HAZ-4 requires compliance with Public Resources Code Sections 4427 (distance from construction equipment), 4428 (fire suppression equipment on site), 4431 (distance from gasoline-powered power tools), and 4442 (spark arrestors on internal combustion engine equipment) which will ensure that fire hazard is minimized. Measure CSM-HAZ-5 establishes fire prevention measures at the campus, including fire breaks, availability of extinguishers, and compliance with County and state fire safety requirements, to be implemented for the duration of Project operations.

Hydrology and Water Quality

Impact HYD-1: Violate any water quality standards or waste discharge requirements and/or otherwise substantially degrade water quality.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following five mitigation measures to reduce this impact to a less than significant level. Measures CSM-HYD-1, CSM-HYD-2, CSM-HAZ-1, and CSM-HAZ-2 were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-HYD-1: Implement erosion-control measures to protect water quality during construction at College of San Mateo.

CSM-HYD-2: Design and maintain hydromodification features as postconstruction measures at the College of San Mateo.

CSM-HAZ-1: Prepare and implement a Spill Prevention, Control, and Countermeasure Program for construction activities at the College of San Mateo.

CSM-HAZ-2: Prepare a site safety plan (soil and groundwater management plan) to protect people from residual soil/groundwater contamination during construction at the College of San Mateo.

CSM-HYD-3: Design and maintain stormwater treatment features as postconstruction measures at the Building 20 Complex at the College of San Mateo.

Under measure CSM-HYD-1, the District will ensure the Project's construction specifications include the storm water pollution prevention plan to minimize the mobilization of sediment to storm drains and adjacent water bodies. This measure identifies the requirements of that plan. Measure CSM-HYD-2 will ensure that facility improvement areas are incorporated into the design prior to the construction phase, where feasible, and located to limit stormwater runoff and provide for onsite treatment of contaminants. It includes specific performance standards to ensure its effectiveness. Under measure CSM-HAZ-1, the contractors will develop (subject to District review and approval) and implement a SPCCP to minimize the potential for and effects from spills of hazardous, toxic, or petroleum substances during construction and demolition activities. The SPCCP will be completed before any construction or demolition activities begin. The measure includes performance standards for the treatment of any reportable spill to ensure that impacts will be kept below a level of significance. Measure CSM-HAZ-2 requires the construction specifications to include specific performance standards to protect construction workers and/or the public from known or previously undiscovered soil and groundwater contamination during construction activities. Prior to excavation, a Site Safety Plan (soil and groundwater management plan) will be prepared, as specified in the measure.

Measure CSM-HYD-3 will ensure the design of the proposed parking lot at the Building 20 complex includes appropriately sized stormwater treatment to minimize the mobilization of pollutants to storm drains and adjacent water bodies.

Impact HYD-2: Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, resulting in a net deficit in aquifer volume or a lowering of the local groundwater table level.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-HYD-2: Design and maintain hydromodification features as postconstruction measures at the College of San Mateo.

This measure will ensure that facility improvement areas are incorporated into the design prior to the construction phase, where feasible, and located to limit stormwater runoff and provide for onsite treatment of contaminants. It includes specific performance standards to ensure its effectiveness.

Impact HYD-3: 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 that would result in substantial erosion or siltation onsite or offsite, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following three mitigation measures to reduce this impact to a less than significant level. These measures were originally identified in the 2015 Certified EIR and are accordingly adopted for the Project as amended by the Project Change.

CSM-HYD-1: Implement erosion-control measures to protect water quality during construction at College of San Mateo.

CSM-HYD-2: Design and maintain hydromodification features as postconstruction measures at the College of San Mateo.

CSM-HYD-4: Design the site so that post-project peak runoff rates are at or below pre-project peak runoff rates.

Under measure CSM-HYD-1, the District will ensure the Project's construction specifications include the storm water pollution prevention plan to minimize the

mobilization of sediment to storm drains and adjacent water bodies. This measure identifies the requirements of that plan. Measure CSM-HYD-2 will ensure that facility improvement areas are incorporated into the design prior to the construction phase, where feasible, and located to limit stormwater runoff and provide for onsite treatment of contaminants. It includes specific performance standards to ensure its effectiveness. Under measure CSM-HYD-4, the District will adopt design criteria for development projects to protect campus stormwater facilities and to mitigate potential adverse impacts to downstream areas due to increases in peak runoff flow rates.

Impact HYD-4: Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level. Measure CSM-HYD-2 was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-HYD-2: Design and maintain hydromodification features as postconstruction measures at the College of San Mateo.

CSM-HYD-4: Design the site so that post-project peak runoff rates are at or below pre-project peak runoff rates.

Measure CSM-HYD-2 will ensure that facility improvement areas are incorporated into the design prior to the construction phase, where feasible, and located to limit stormwater runoff and provide for onsite treatment of contaminants. It includes specific performance standards to ensure its effectiveness. Under measure CSM-HYD-4, the District will adopt design criteria for development projects to protect campus stormwater facilities and to mitigate potential adverse impacts to downstream areas due to increases in peak runoff flow rates.

Impact HYD-5: 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 or place within a 100-year flood hazard area structures that would impede or redirect flood flows.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following two mitigation measures to reduce this impact to a less than significant level. Measure CSM-HYD-2 was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-HYD-2: Design and maintain hydromodification features as postconstruction measures at the College of San Mateo.

CSM-HYD-4: Design the site so that post-project peak runoff rates are at or below pre-project peak runoff rates.

Measure CSM-HYD-2 will ensure that facility improvement areas are incorporated into the design prior to the construction phase, where feasible, and located to limit stormwater runoff and provide for onsite treatment of contaminants. It includes specific performance standards to ensure its effectiveness. Under measure CSM-HYD-4, the District will adopt design criteria for development projects to protect campus stormwater facilities and to mitigate potential adverse impacts to downstream areas due to increases in peak runoff flow rates.

Noise

Impact CSM-NOI-1: Expose persons to or generate noise levels in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-NOI-1: Employ noise-reducing construction practices at the College of San Mateo.

This will require the contractor to employ noise-reducing construction practices to limit noise to be in compliance with the county noise standards between the hours of 6:00 p.m.

and 7:00 a.m. weekdays, 5:00 p.m. and 9:00 a.m. on Saturdays, or at any time on Sundays, Thanksgiving and Christmas. The measure includes specific performance standards to ensure it will be effective.

Impact CSM-NOI-4: Result in a temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing without the Project.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-NOI-1: Employ noise-reducing construction practices at the College of San Mateo.

This will require the contractor to employ noise-reducing construction practices to limit noise to be in compliance with the county noise standards between the hours of 6:00 p.m. and 7:00 a.m. weekdays, 5:00 p.m. and 9:00 a.m. on Saturdays, or at any time on Sundays, Thanksgiving and Christmas. The measure includes specific performance standards to ensure it will be effective.

Transportation and Traffic

Impact CSM-TRA-4: Result in potential construction impacts on traffic operation and circulation, transit service, nonmotorized transportation facilities, and emergency access.

Finding:

Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final environmental impact report. As shown in the June 6, 2018 Traffic Study for the Demolition of the College of San Mateo Building 20 Complex, the Project Change will not increase any traffic to or from CSM and therefore would not change any of the prior traffic analysis.

Supporting Evidence:

The Board has adopted the following mitigation measure to reduce this impact to a less than significant level. This measure was originally identified in the 2015 Certified EIR and is accordingly adopted for the Project as amended by the Project Change.

CSM-TRA-1: Implement a Traffic Control Plan during construction at the College of San Mateo.

This will require the construction contractor(s) to develop a traffic control plan, consistent with the performance measures set out in the mitigation measure, to minimize the effects of construction traffic on the surrounding area. The plan will be subject to review and approval by the District.

III. FINDINGS REGARDING THE PROJECT ALTERNATIVES

In addition to the No-Project Alternative, the SEIR examined two alternatives: Building Demolition Only and Reduced Parking.

Public Resources Code section 21002 provides that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects[.]” The CEQA Guidelines defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social and technological factors.” (CEQA Guidelines Section 15364) The concept of “feasibility” also encompasses the question of whether a particular alternative promotes the underlying objectives of a project. (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417.) “[F]easibility’ under CEQA also encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 410, 417; *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.)

No Project Alternative: Under this alternative, the proposed facilities improvements would not be made. The Building 20 Complex would not be demolished and the parking lot and associated improvements would not be constructed. Building 20, the greenhouse, the lath house, and the North and South Gardens would continue to exist in their current states. The buildings would continue to need minimal maintenance to maintain safety, and they would continue to occupy space on campus without providing use. The gardens would continue to need maintenance. Existing parking available at the site would remain at its current level.

Finding:

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the project alternatives identified in the environmental impact report.

Supporting Evidence:

The No Project Alternative would not meet any of the Project objectives and is rejected for that reason. In addition, even with maintenance, the structures on site would continue to age because they would not be utilized. Eventually, the structures would be likely to become unsafe. In particular, Building 20 is known to house hazardous building materials, and the potential release of these environmental toxins could pose an environmental hazard.

Building Demolition Only Alternative: Under this alternative Building 20, the greenhouse, and the lath house would be demolished but the parking lot and associated improvements would not be constructed. The former building area would be seeded to provide a larger grassy open area or could potentially provide an opportunity for revegetation with native species. The North and South Gardens would continue to exist in their current states. The gardens and the open space would continue to need maintenance and improvements to repair or replace deteriorating and uneven pathways. Existing parking available at the Project Change Site would remain at its current level.

Finding:

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the project alternatives identified in the environmental impact report.

Supporting Evidence:

This alternative does not meet the following Project objectives and is rejected for that reason:

- *Provide parking, direct access, and loading space for the new Building 19, Emerging Technologies:* Demolition only would not provide sufficient space to serve the new building. As discussed in Section 2.3 in Chapter 2, *Project Description*, of the SEIR, based on the District's past and current practices on other similar construction projects, approximately two acres are needed to provide adequate staging area for the demolition of existing Buildings 12 and 19 and construction of the new 53,250-sf Building 19, Emerging Technologies. For example, the staging area for the current construction of the 55,000-sf Building B23 at Cañada College is approximately 97,500 sf (2.24 acres). The existing parking lot in the Building Only Demolition Alternative would not provide adequate staging area for construction equipment, demolition debris, and building materials associated with the Building 19, Emerging Technologies project.
- *Provide a staging area for the construction of the new Building 19, Emerging Technologies, that is adequately sized and located so as to minimize environmental impacts and disruptions to ongoing campus activities during Building 19 construction:* As discussed above, this alternative would not provide a useful staging area for construction of Building 19.
- *Expand parking options on the east side of the campus to better serve current students, staff, and the community/visitors:* This alternative would not expand parking options.
- *Improve access for disabled students:* This alternative would not change access for the disabled.

Reduced Parking Alternative: This alternative assumes that Building 20, the greenhouse, the

lath house, and a portion of the South Garden would be demolished for construction of a smaller parking lot than that proposed under the Project. Specifically, lots 20, 20A, and 20M would be combined into a single larger parking lot. To accomplish this, the Building 20 Complex would be demolished and a 1.4-acre parking lot containing approximately 180 parking spaces (replacing the existing 30–40 parking spaces) and associated improvements would be constructed. In addition to landscaping, described below, improvements would include storm water drainage, catch basins, and storm water treatment facilities; lighting, signage, and security. The parking lot would be located in the space currently occupied by the buildings and on adjacent space currently occupied by approximately 55 percent of the South Garden and 20 percent of the North Garden.

Approximately 45 percent of the South Garden, including the semi-mature non-native *Metasequoia glyptostroboides* (i.e., dawn redwood) tree and lawn area surrounding it, would be retained and improved with additional plantings. Additionally, over 80 percent of the North Garden would be retained and improved for outdoor education use by science classes. The Reduced Parking Alternative would require the removal of some existing trees, plants, and landscaping elements, but the amount of removed open space would be reduced compared to the Project. Even with the dramatic reeducation to the scope of the project under the Reduced Parking Alternative, the Reduce Parking Alternative would continue to have a significant and unavoidable impact with respect to exposing sensitive receptors to particulate matter pollution during construction as implementation of Mitigation Measure CSM-AQE-6 would still not be sufficient for impacts to the park area and would still be outside the jurisdiction and control of the District for offsite receptors. Similarly, other alternatives that would reduce the scope or uses outside the demolished Building 20 would also continue to have Air Quality construction impacts.

Finding:

Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the project alternatives identified in the environmental impact report.

Supporting Evidence:

This alternative would not meet the Project objective to provide a staging area for the construction of the new Building 19, Emerging Technologies, that is adequately sized and located so as to minimize environmental impacts and disruptions to ongoing campus activities during Building 19 construction. As discussed in Section 2.3 in Chapter 2, Project Description of the SEIR, based on the District's past and current practices on other similar construction projects, approximately two acres are needed to provide adequate staging area for the demolition of existing Buildings 12 and 19 and construction of the new 53,250-sf Building 19, Emerging Technologies. The smaller, 1.4-acre parking lot in the Reduced Project Alternative would not provide adequate staging area for construction equipment, demolition debris, and building materials associated with the Building 19, Emerging Technologies project. This would unacceptably impair the District's ability to complete the demolition and construction associated with new Building 19, Emerging Technologies. Moreover, the Reduced Parking Alternative would

still have a significant and unavoidable impact to Air Quality during construction.

IV. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final SEIR for the Project Change concluded that there would be a significant and unavoidable environmental impact on air quality during construction. Pursuant to CEQA Guidelines Section 15093, if it is to approve the Project Change, the Board must adopt a Statement of Overriding Consideration describing the Project Change's economic, legal, social, technological or other benefits. The following Statement of Overriding Considerations describes the specific Project Change benefits that outweigh its significant, unavoidable impact.

The Final SEIR disclosed that the Project Change will expose existing offsite receptors to pollutant concentrations during construction (Impact CSM-AQE-5). Construction-related diesel particulate matter (DPM) and fine particulate matter (PM2.5) at the College of San Mateo would exceed thresholds for pollutant concentrations established by the Bay Area Air Quality Management District. This impact would be temporary. As described in the above findings, the District has adopted several mitigation measures to reduce this impact below a level of significance as it applies to onsite receptors.

The Board finds that the following Project Change benefits outweigh this significant impact.

- The Project Change will remove Building 20 and eliminate its hazardous construction materials. This will eliminate the potential for unintentional release of these materials over time and avoid cost to the District of remediating a building that is no longer suitable for instructional or other use.
- The Project Change will support the overall campus renovation begun with the 2006 Campus Master Plan and continuing under the amended 2015 Campus Master Plan. It will provide convenient staging area for the construction of the new Building 19, Emerging Technologies. Without a convenient, sufficiently large area (at least 2 acres) for staging the demolition of existing Buildings 12 and 19 and construction of the new 53,250-sf Building 19, Emerging Technologies, ongoing campus activities would be impeded by having to locate staging activities in more than one location. Scattered staging sites would necessitate moving and storing materials around campus, disrupting normal activities.
- The Project Change will meet the following public policy objectives of the District:
 - Provide parking, direct access, and loading space for the new Building 19, Emerging Technologies;
 - Provide a staging area for the construction of the new Building 19, Emerging Technologies, that is adequately sized and located so as to minimize environmental impacts and disruptions to ongoing campus activities during Building 19 construction;

- Expand parking options on the east side of the campus to better serve current students, staff, and the community/visitors who access much-utilized facilities such as Building 10;
- Improve access for disabled persons; and
- Ensure safety of students and faculty by removing unsafe structures.