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RECEIPT NUMBER:  
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SEE INSTRUCTIONS ON REVERSE. TYPE OR PRINT CLEARLY.

LEAD AGENCY SEQUOIA UNION HIGH SCHOOL DISTRICT	LEAD AGENCY EMAIL	DATE 03/19/2025
COUNTY/STATE AGENCY OF FILING SAN MATEO COUNTY	DOCUMENT NUMBER 129161	

PROJECT TITLE  
 CARLMONT HIGH SCHOOL POOL LIGHTING PROJECT

PROJECT APPLICANT NAME SEQUOIA UNION HIGH SCHOOL DISTRICT	PROJECT APPLICANT EMAIL	PHONE NUMBER
PROJECT APPLICANT ADDRESS	CITY	STATE
		ZIP CODE

PROJECT APPLICANT (Check appropriate box)

Local Public Agency    
  School District    
  Other Special District    
  State Agency    
  Private Entity

CHECK APPLICABLE FEES:

- Environmental Impact Report (EIR) \$ 4,123.50 \$ \_\_\_\_\_
- Mitigated/Negative Declaration (MND)(ND) \$ 2,968.75 \$ \_\_\_\_\_
- Certified Regulatory Program (CRP) document - payment due directly to CDFW \$ 1,401.75 \$ \_\_\_\_\_
- Exempt from fee
  - Notice of Exemption (attach)
  - CDFW No Effect Determination (attach)
- Fee previously paid (attach previously issued cash receipt copy)
- Water Right Application or Petition Fee (State Water Resources Control Board only) \$ 850.00 \$ \_\_\_\_\_
- County documentary handling fee \$ 50.00 \$ \_\_\_\_\_ 50.00
- Other \$ \_\_\_\_\_

PAYMENT METHOD:

Cash    
  Credit    
  Check    
  Other

TOTAL RECEIVED \$ \_\_\_\_\_ 50.00

SIGNATURE 	AGENCY OF FILING PRINTED NAME AND TITLE Kamille Santos Deputy Clerk
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**Notice of Exemption**

**Appendix E**

To: Office of Planning and Research  
P.O. Box 3044, Room 113  
Sacramento, CA 95812-3044

From: (Public Agency): Sequoia Union High School District  
480 James Avenue  
Redwood City, CA 94062

County Clerk  
County of: San Mateo  
555 County Center  
Redwood, CA 94063

129161

**FILED**  
SAN MATEO COUNTY  
**Mar 19 2025**

Project Title: Carlmont High School Pool Lighting Project

Project Applicant: Sequoia Union High School District

Project Location - Specific:  
1400 Alameda de Las Pulgas

MARK CHURCH, County Clerk

By [Signature]  
Deputy Clerk

Project Location - City: Belmont Project Location - County: San Mateo

Description of Nature, Purpose and Beneficiaries of Project:  
Install four 50-foot-high lighting poles to replace the existing 20-foot-high lighting poles located at each corner of the school's swimming pool. The project would enhance safety conditions for pool use during evening hours.

Name of Public Agency Approving Project: Sequoia Union High School District

Name of Person or Agency Carrying Out Project: Sequoia Union High School District

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: §15301 Class 1, §15302, Class2, §15303, Class 3
- Statutory Exemptions. State code number: \_\_\_\_\_

Reasons why project is exempt:

The District determined that the project is categorically exempt for the following reasons: The project would install accessory lighting structures; the project would be located on the same site as the existing school and school aquatic center; the new light poles would be installed to improve safety conditions during night events and activities near the pool; the project would not result in a change of use of the aquatic center and would not expand the use of the swimming pool; sufficient electricity is available to service the new light poles; and, the project site is not within an environmental sensitive environment.

Lead Agency  
Contact Person: Narayan Naidu Area Code/Telephone/Extension: 650-369-1411 ext.22292

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? ■ Yes No

Signature: [Signature] Date: 03/19/2025 Title: CHIEF FACILITIES OFFICER  
■ Signed by Lead Agency    Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.  
Reference: Sections 21108, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: \_\_\_\_\_

## Notice of Exemption

**To:** Office of Planning and Research  
1400 Tenth Street, Room 121  
Sacramento

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

San Mateo County Clerk  
555 County Center  
Redwood, CA 94063

**Project Title:** Carlmont High School Pool Lighting Project

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**Project Location:** 1400 Alameda de Las Pulgas

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**Project Location:** Belmont                      **County:** San Mateo

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**Description of Nature, Purpose, and beneficiaries of Project:** The proposed project would

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Install four 50-foot-high lighting poles to replace the existing 20-foot high lighting poles located at each corner of the school's swimming pool.

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**Name of Public Agency Approving Project:** Sequoia Union High School District (District)

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**Name of Person or Agency Carrying Out Project:** Sequoia Union High School District

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**Exempt Status:**

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Ministerial (Sec. 21080(b)(1); 15268);

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Declared Emergency (Sec. 21080(b)(3); 15269(a));

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Emergency Project (Sec. 21080(b)(4); 15269(b)(c));

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**Categorical Exemption**    Section 15301 Class 1, *Existing Facilities*; Section 15302 Class 2, *Replacement of Reconstruction*, and Section 15303, Class 3, *New Construction or Conversion of Small Structures*.

Statutory Exemptions. State code number:

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**Lead Agency:** Sequoia Union High School District      **Area Code/Telephone:** (650)369-1411  
Ext. 22292

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**Contact Person:** Narayan Naidu, Chief Facilities Officer

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**Attachment:**

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Certified document of exemption finding.



**Signature:**

**Date:** 03/19/2025

**Title:** CHIEF FACILITIES OFFICER

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Date received for filing at OPR:

# CARLMONT HIGH SCHOOL POOL LIGHTING PROJECT

## SEQUOIA UNION HIGH SCHOOL DISTRICT JUSTIFICATION FOR CATEGORICAL EXEMPTION

### I- Project Description

#### *Site Location*

The proposed Carlmont High School Pool Lighting project (proposed project) is located in Carlmont High School, at 1400 Alameda de Las Pulgas in Redwood City, California (**Figure 1**), on a 42-acre parcel with 160,690 square feet of building area. Carlmont High School is a public school in Sequoia Union High School District that serves grades 9 through 12. The high school, founded in 1952, has an enrollment of approximately 2,370 students<sup>1</sup> and a total of 102 classrooms. The high school is bounded by Valerga Drive on the northwest, Alameda de Las Pulgas on the northeast, Cranfield Avenue on the southeast, and undeveloped land to the south and southwest separates the school from Hasting Drive. Multi-family buildings are located to the northwest and single-home residences are located to the north and northeast. Tierra Linda Middle School and Crossing Community Church are located to the northeast across Alameda de Las Pulgas.

The north portion of the campus encompasses a mix of academic buildings, administrative offices, a performing art center, and various athletic facilities including a softball field, a football/tracker/track field, tennis courts, gymnasiums, and an aquatic center. A baseball field is in the southeast corner of the campus (**Figure 2**).

#### *Existing Conditions*

The aquatic center (project site) includes a 92-by-76-foot swimming pool constructed around 2006. The original swimming pool, built in 1952 with the school and currently demolished, was located 300 feet southwest of the project site, where the Main Gym is currently located (**Figure 2**). The project site was originally developed with tennis courts. The pool is configured with 12 swimming lanes, each separated by lane lines. Two aquatic buildings with changing rooms and lavatories are located along the southwestern side of the pool. The pool is surrounded by a deck with varying widths on each side: Two sides of the pool have a 30-foot-wide deck; one side has a 20-foot-wide deck; and one side has a 10-foot-wide deck. Access to the pool is provided through ladders on each side. A home bleacher that can seat up to 152 spectators is located along the southeastern side of the pool. An internal school road with 90-degree parking spaces

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<sup>1</sup> Carlmont High School. 2024. 2024-2025 School Profile.

[https://docs.google.com/document/d/1NgO9XjO9\\_HEkSbDRIYE4Y28hYdKx-S-aPlmXFjiEkq8/edit?tab=t.0](https://docs.google.com/document/d/1NgO9XjO9_HEkSbDRIYE4Y28hYdKx-S-aPlmXFjiEkq8/edit?tab=t.0).

Accessed: October 28, 2024.

separates the aquatic center from the campus southeastern boundaries. This side of the campus boundaries is lined with bushes, as well as oak and eucalyptus trees. The pool area is enclosed by a 10-foot metal fence made of vertical metal bars combined with sections of chain-link fencing.

The pool is primarily used by the school's swim team for training and competitions and is generally accessible year-round. However, in an alternating 4-year cycle, the pool is closed from November through January. Peak usage occurs from early August to late October during the water polo season and physical education classes, and again from February through May for the swimming season and physical education classes. During peak seasons, the pool operates from 6:00 a.m. to 10:00 p.m. Approximately, 16 swimming competitions are held annually in the evening, requiring full light capacity. Additionally, the Sequoia Union High School District makes school and athletic facilities, including the pool, available for rental when not in use for school activities.

Four light poles of 20-foot high are located at approximately each corner of the pool area. The existing light poles provide a light at ground level for pathfinding that is sufficient for general visibility and pedestrian security (Figure 3). The existing four light poles are not sufficient for athletic activities and are currently operating on a set schedule with all campus pathfinding lights.

The absence of proper athletic pool lighting has significantly impacted students, forcing water polo games to be scheduled during the day to avoid forfeits caused by inadequate nighttime lighting. Some games have been forced to end prematurely due to dangerously low lighting conditions. Certain school and rental groups continue to practice at night and early morning under limited lighting, creating a significant safety risk. For specific events or rental groups, the District has been renting construction lights.

### ***Proposed Project***

The proposed project would install four 50-foot poles in the planters on the outer corners of the pool as shown on Figure 4. The existing poles would remain in place to continue functioning as pathfinding lights. The new poles would be equipped with Light-Emitting-Diode (LED) lighting. LED lights have minimum spillage and are energy efficient.<sup>2</sup>

The quantity of light that a lighting device emits is measured in Lumens.<sup>3</sup> Light intensity when viewed off field<sup>4</sup> is measured in candela, which is the perceived power of light emitted in a particular direction. The International Commission of Illumination (ICI) defines the limit of light intensity when viewed off the field in suburban areas at 10,000 candelas.

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<sup>2</sup> LED lights use up to 90 percent less energy than incandescent bulbs and significantly less than fluorescent lighting.

<sup>3</sup> Lumens is the measure of quantity of light a source produces that is visible to the human eye. As an example, a standard 60-watt incandescent bulb emits about 800 lumens.

<sup>4</sup> An off-field view for light intensity refers to the measurement or observation of light levels outside the primary area of focus or illumination. In the context of lighting, it assesses how much light spills or scatters beyond the intended area.



Each new lighting pole would be of 67,000 Lumens with a maximum off-field intensity of 38 candelas.

The lights would be dimmed in the evenings while in use except during swimming events.

The proposed project would enhance safety conditions for pool use during evening hours. The proposed project would not change or expand the pool usage; swimming teams would maintain their current practice schedules, and events would continue as they currently do. In addition, the proposed project would not increase the number of night swimming event at the school.

## **II- Reasons to Support Exemption Findings**

CEQA provides several "categorical exemptions" which are applicable to categories of projects and activities that the lead agency has determined generally do not pose a risk of significant impacts on the environment. The proposed project would install new light poles and lighting at the school aquatic center. The project District has determined that the proposed project is exempt under CEQA Guidelines Section 15301 – *Existing Facilities*, Section 15302 – *Replacement of Reconstruction*, and Section 15303 – *New Construction or Conversion of Small Structures*.

Class 1 Exemption applies to the "operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment or topographical features, involving negligible or no expansion of existing or former use." The key consideration is whether the project involves negligible or no expansion of use. Example of projects that would qualify under Class 1 Exemption include (a) "existing facilities, of both investor and publicly owned utilities used to provide electric power, natural gas, sewerage, or other public utilities services; (b) Interior or exterior alterations involving such things as interior partitions, plumbing, or electrical conveyances.

Class 2 Exemption applies to the replacement or reconstruction of existing utility systems involving negligible or no expansion of capacity, located on the same site as the structure replaced, and possess substantially the same purpose and capacity as the structure replaced, including but not limited to "replacement or reconstruction of existing utility systems and/or facilities involving negligible or no expansion of capacity."

Class 3 Exemption applies to the construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. Examples of projects that would qualify for exemption under Class 3 include utilities extension and installation of accessory structures.

The proposed project would install four light poles at the school aquatic center. The school is located within an area that is currently supplied with all public utilities including electricity and would not require the construction of new public utilities. The new poles would be installed in

existing planters within the aquatic center that have been previously developed with tennis courts. The project would add an equipment to an existing use without resulting in an expansion of the aquatic center.

The proposed project is exempt per CEQA Guidelines section 15301 Class 1, section 15302 Class 2, and section 15303 Class 3 for the following reasons:

- 1- The proposed project would install accessory lighting structures.
- 2- The proposed project would be located on the same site as the existing school and school aquatic center.
- 3- The new light poles would be installed to improve safety conditions during night events and activities near the pool.
- 4- The proposed project would not result in a change of use of the aquatic center and would not expand the use of the swimming pool or any other activities at the school.
- 5- Sufficient electricity is available to service the new light poles.
- 6- The project site is not within an environmental sensitive environment.

### **III- Exceptions to Categorical Exemptions**

CEQA Guidelines section 15300.2, *Exceptions*, identifies conditions under which categorical exemptions would not be applicable. Section 15300.2 notes that projects that qualify for an exemption must also be evaluated relative to other factors, including location (Classes 3, 4, 5, 6, and 11 only), potential for cumulative impacts, potential for significant impacts, potential for effect on a scenic highway, potential to be located on a hazardous waste site, and potential to affect historic resources. The project has been evaluated for characteristics or circumstances that might invalidate findings that the project is exempt. This evaluation is provided below.

#### ***A. Location***

CEQA Guidelines section 15300.2(a) states that Class 3, 4, 5, 6, and 11 exemptions are qualified by consideration of whether the project is located in a uniquely sensitive environment, such that it impacts an environmental resource of hazardous or critical concern that has been designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. This exception does not apply to the proposed project as it is exempt under section 15303 Class 3 and all modifications would occur within an existing school campus where there are no known sensitive environmental conditions.

#### ***B. Cumulative Impact***

Exemptions are not applicable when there is a significant cumulative impact of "successive projects of the same type in the same place over time." Beyond the proposed project, other projects that will occur in 2025 at Carlmont High School include window and roof replacements, as well as the restoration of the school's baseball field. The environmental effects caused by these other projects would be localized impacts and part of the maintenance and repair activities that take place routinely at the school. These activities would comply with



applicable regulations and District best management practices. Any potential construction overlap would not involve heavy construction activities and would not result in significant adverse construction impact. Therefore, the proposed project would not result in cumulative impacts within the school.

### *C. Significant Effects*

A categorical exemption cannot be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances (CEQA Guidelines Section 15300.2(c)). The determination whether this exception applies involves two distinct questions: (1) whether the project presents unusual circumstances, and (2) whether there is a reasonable possibility that a significant environmental impact will result from those unusual circumstances. The lead agency considers this aspect of the test only after determining that some circumstances of the project is unusual.

The proposed installation of light poles to improve the safety conditions during the evening use of the swimming pool at Carlmont High School is not unusual. The project would be confined to the boundaries of the existing school campus and within the school's aquatic center. The height of the poles would be 50-foot-high. The light poles would be of 67,000 lumens. The intensity of the new light poles would be significantly of less glare than the existing poles in the nearby baseball field.<sup>5</sup> In addition, based on the lighting analysis<sup>6</sup> prepared for the proposed project, the new light poles would have a maximum off-field light intensity of 38 candelas, much below the 10,000 candelas limit of light intensity defined by the ICI for suburban areas. Construction activities would be in compliance with applicable regulations and policies and would be overseen by the California Department of Education and Division of the State Architect.

There are no known unusual circumstances related to the project site, and there is also no evidence that the proposed project would cause significant direct or indirect environmental effects. The site has been previously developed. Apart from the minimal soil disturbance at the planters for installing the light poles, the proposed project would not involve any additional site grading. The District would comply with all applicable laws and regulations and would implement best management practices that would minimize potential environmental impacts caused by construction activities. Therefore, this exception does not apply to the proposed project.

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<sup>5</sup> A standard-sized football field requires a total of 1,152,000 to 5,760,000 lumen output (recreational to professional level). (Sports Venue Calculator. <https://sportsvenuecalculator.com/knowledge/led-sports-lighting/stadium-sports-field-lighting-cost/>, Accessed December 27, 2024).

<sup>6</sup> Musco Lighting. 2024. Carlmont High School. Belmont, California. Lighting System. Illumination Summary. September 25.

#### *D. Scenic Highways*

A categorical exemption cannot be used for a project which may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway (CEQA Guidelines section 15300.2(d)). The closest officially designated highway is State Highway 280, located approximately at 1.2 miles southwest of the school campus. Due to the distance, topography, and intervening hills, the school site would not be visible, and the proposed project would not result in a visual impact to a scenic resource. Therefore, this exception does not apply to the proposed project.

#### *E. Hazardous Waste Sites*

A categorical exemption cannot be used for a project on a site that is on any list compiled pursuant to section 65962.5 of the California Government Code such as: (1) lists of hazardous materials sites and hazardous waste facilities; (2) hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; (3) public drinking water wells containing detectable levels of organic contaminants; (4) underground storage tanks with reported unauthorized releases; and (5) solid waste disposal facilities from which hazardous waste has migrated.

A review of State Water Resources Control Board (SWRCB) GeoTracker<sup>7</sup> and State Department of Toxic Substances (DTSC) Envirostor<sup>8</sup> databases confirmed that there are no "Open" hazardous materials sites in the vicinity of the project site. The District would implement best management practices during project construction to prevent the release of hazardous materials at the site. These measures would include storing these materials pursuant to manufacturer recommendation, maintaining spill kits onsite, and containing any spills that occur to the extent safe and feasible followed by collection and disposal in accordance with applicable laws. The District will report spills of reportable quantity to applicable agencies. With implementation of the District's construction best management practices, adverse effects related to potential exposure of construction workers or the public to hazardous materials are not anticipated.

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<sup>7</sup> SWRCB. GeoTracker. [https://geotracker.waterboards.ca.gov/profile\\_report?global\\_id=T0608100106](https://geotracker.waterboards.ca.gov/profile_report?global_id=T0608100106). Accessed on December 27, 2024.

<sup>8</sup> DTSC. Envirostor. [https://www.envirostor.dtsc.ca.gov/public/profile\\_report?global\\_id=60001056](https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60001056). Accessed on December 27, 2024.

## ***F. Historical Resources***

A exemption cannot be used for a project which may cause a substantial adverse change in the significance of a historical resource. Historical Resources are defined as buildings, structures, or objects that are more than 50 years old (CCR 4852 (d)(2)). As described under Section I, Project Description above, the Carlmont High School was founded in 1952. However, the aquatic center was built in about 2006. Based on the Historic Compatibility Review (Appendix A) prepared for the proposed project, the school has not been assessed for eligibility to the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or local historic listing. The aquatic center does not meet the minimum age requirement of 50 years to be considered for historical significance. The Historic Compatibility Review found that the aquatic center would not contribute to a historic resource if the Carlmont High School Campus was determined to be historic. In addition, the proposed project would not have any indirect impact on potential historic resources within the campus, because it would not alter the use of the aquatic center or the school nor would it modify any of the school buildings (See Appendix A). Therefore, this exception for historical resources does not apply to the proposed project.

## **IV- Conclusion**

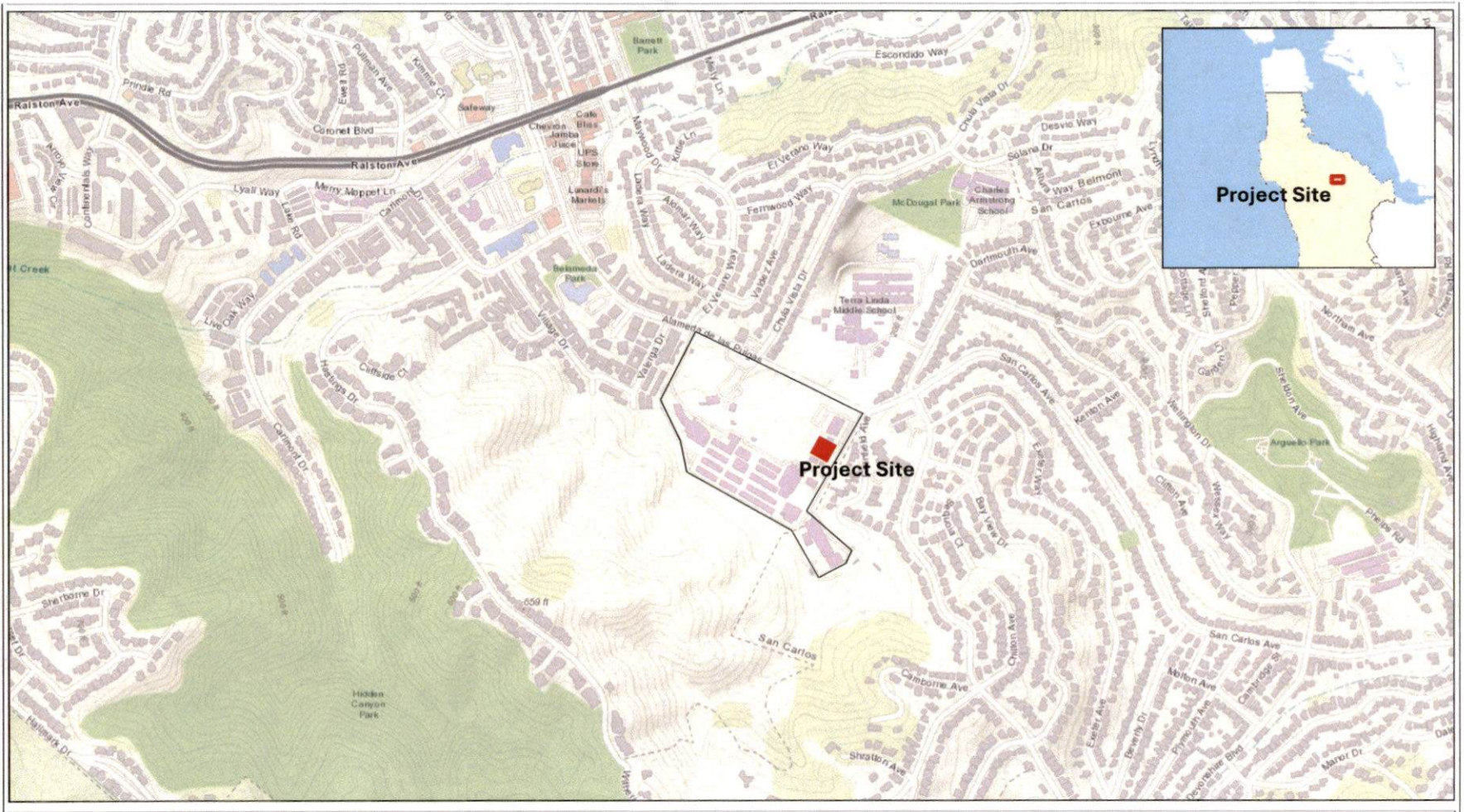
Based on the above discussion, the proposed installation of light poles at the aquatic center of the Carlmont High School are exempt per CEQA Guidelines Section 15301 Class 1, Section 15302 Class 2, and Section 15303 Class 3 exemptions for the following reasons:

- 1- The proposed project would install accessory lighting structures.
- 2- The proposed project would be located on the same site as the existing school and school aquatic center.
- 3- The new light poles would be installed to improve safety conditions during night events and activities near the pool.
- 4- The proposed project would not result in a change of use of the aquatic center and would not expand the use of the swimming pool.
- 5- Sufficient electricity is available to service the new light poles.
- 6- The project site is not within an environmental sensitive environment.

Therefore, the proposed project is categorically exempt under CEQA Section 15301 Class 1 (Existing facilities) and 15303 Class 3 (New Construction or Conversion of Small Structures). Class 1 provides an exemption of and the proposed project is exempt under CEQA.

## FIGURES



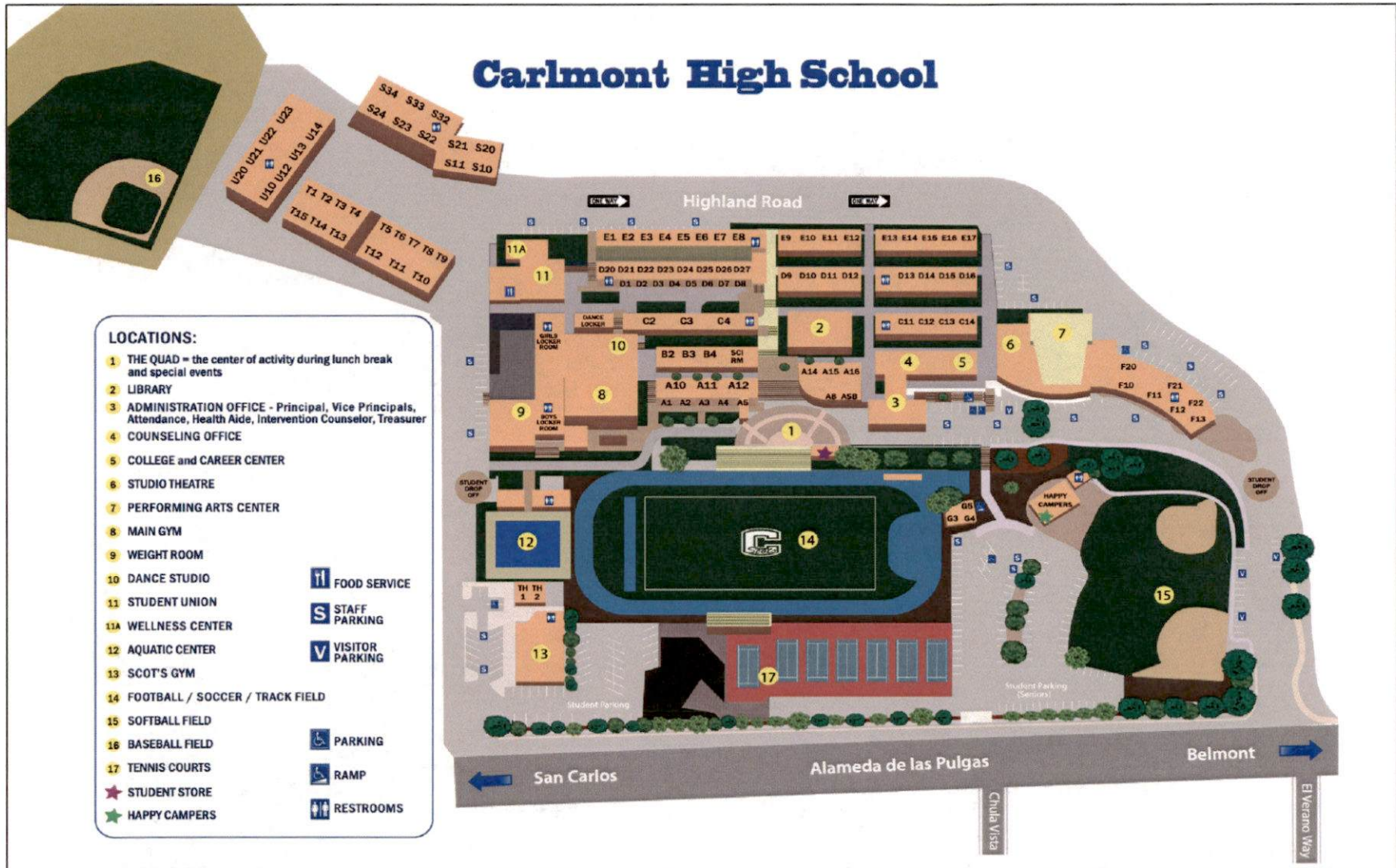


Source: City of Belmont, 2024.

**Figure 1 - Regional Site Location**

□ Carlmont High School





Source: Sequoia Union High School District, 2024.

Figure 2 – Carlmont High School Map





**Figure 3 – Existing Light Poles (Aquatic Center)**





Source: Musco Lighting, 2024.

 Light Poles Location

**Figure 4 – Location of the Proposed New Light Poles**

## **APPENDIX A**





**BRUNZELL**  
HISTORICAL

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December 31, 2024

Rima Ghannam, Principal  
Sertior  
338 Spear Street, 15E  
San Francisco, CA 94105

Subject: Historic compatibility review of the replacement of the pool light poles at Carlmont High School, 1400 Alameda de las Pulgas, Belmont, San Mateo County, California.

Dear Rima,

This letter report provides a compatibility review, of the proposed replacement of the light poles at Carlmont High School (proposed project), with Secretary of the Interior's Standards for the Treatment of Historic Properties. Carlmont High School (the subject property) is located at 1400 Alameda de las Pulgas, Belmont, San Mateo County, California.

### **Introduction**

Carlmont High School was built in 1952 and therefore has the potential to qualify as a historical resource pursuant to the California Environmental Quality Act (CEQA). The subject property may be eligible for listing on the National Register of Historic Places (NRHP) and the California Register of Historical Resources (CRHR). This study examines the potential of the proposed replacement of light poles at Carlmont High School pool to result in a negative impact on historical resources.

### **Methodology**

Brunzell Historical personnel conducted preliminary research utilizing historic aerial photographs, the City of Belmont website, Sequoia Union High School District records, and California Office of Historic Preservation records in the California Historical Resource Inventory System (CHRIS). Review of these records indicated that the subject property has not been assessed for eligibility to the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), or local historic listing. Brunzell Historical Principal Kara Brunzell conducted a site visit to Carlmont High School on December 3, 2024. The site visit included collecting photographs of all elevations of the proposed project area as well as context views of nearby areas of the campus. Brunzell Historical personnel assessed the proposed lighting installation project for potential negative impacts to the subject property as a potential historical resource.

Any activity that results in the destruction of character-defining features of a historical resource would create a significant negative impact on the environment under CEQA. The Secretary of the Interior's Standards for the Treatment of Historic Properties is a set of guidelines utilized to avoid negative impacts to historical resources; the proposed project was thus analyzed under the Secretary of the Interior's Standards to examine if the proposed construction and operations could create a negative impact to historical resources.

## **Summary of Findings**

The subject property has not been evaluated for NRHP and CRHR eligibility. However, Carlmont High School was built in 1952 and is thus being treated as a historical resource for the purpose of this study. Based on review of historic aerial photographs, the Carlmont High School aquatic center was built around 2006 on the site of former school tennis courts. Aerial photographs indicate that Scot's Gym, adjacent to the pool to the northeast, was constructed around 2009. The built environment at the project site and in the vicinity thus would not contribute to the historical resource if the subject property was determined eligible to the NRHP/CRHR. Therefore, indirect impacts of the proposed project on historic-era areas of the school were assessed since the project site does not include historic-era resources. The proposed project would not have a negative impact on any historic features that may be present on historic-era campus buildings, nor would it degrade the integrity of the potential historic setting. The proposed project would conform to the Secretary of the Interior's Standards for the Treatment of Historic Properties and would not result in a negative impact to the potential historical resource.

## **Regulatory Context**

Federal, state, and local regulations recognize the public's interest in historical resources and the public benefit of preserving such resources. These regulations include federal and state historical resource registration programs designed to assist in the identification and evaluation of resources and to determine whether these resources should be considered historical resources under CEQA.

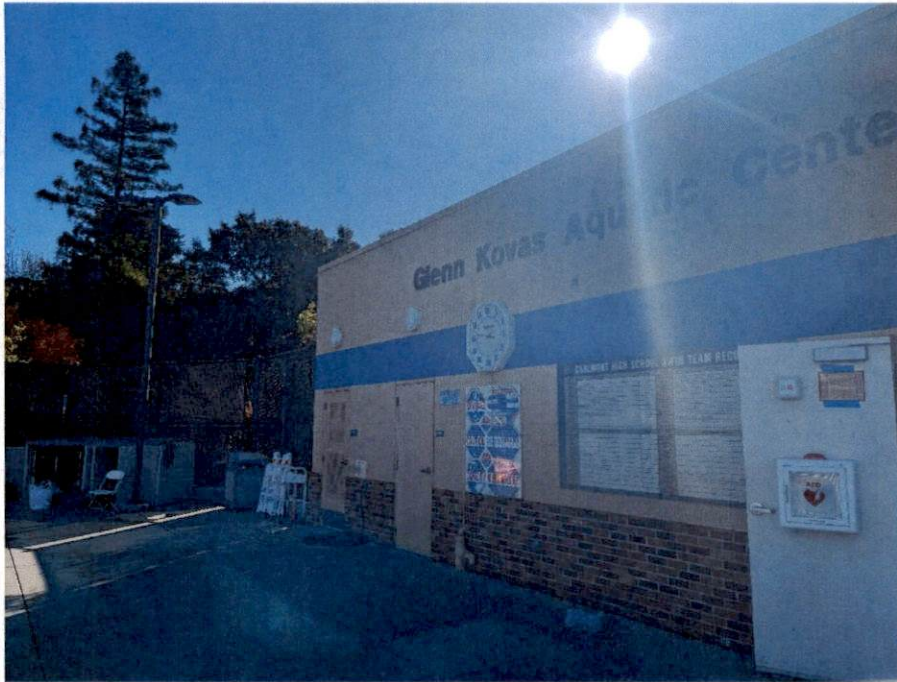
Properties eligible for the NRHP and/or CRHR are subject to California laws that require consideration of potential impacts of proposed projects on historical resources. These properties should also receive special consideration in the planning process, or merit consideration as candidates for individual protection.

Typically, projects that adhere to the US Secretary of the Interior's Standards for the Treatment of Historic Properties are understood to not cause significant adverse impacts to historical resources.

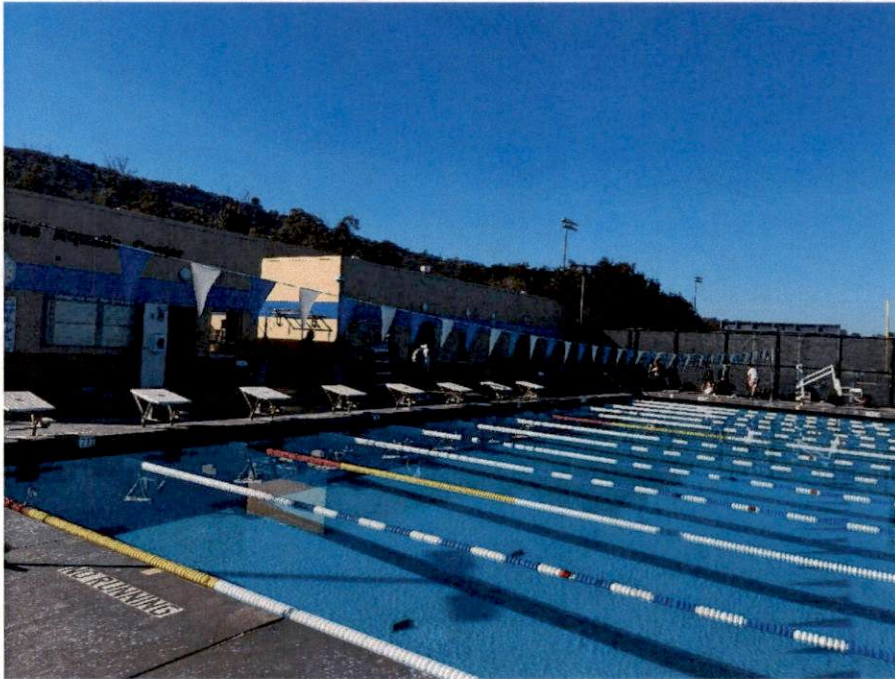
## **Subject Property Description**

The 42-acre Carlmont High School subject property is located in a hilly residential neighborhood about a mile southwest of downtown Belmont. The property comprises the school campus with athletic facilities and an aquatic center located northeast of academic and administration buildings. The Carlmont High School campus is bounded by Valerga Drive on the northwest, Alameda de Las Pulgas on the northeast, Cranfield Avenue on the southeast, and undeveloped land to the south and southwest separates the school from Hasting Drive.

The aquatic center includes a 92- by 76-foot swimming pool with 12 swimming lanes and two buildings with changing rooms and lavatories located along the southwest side of the pool. The pool is surrounded by a deck with varying widths on each side. Access to the pool is provided through ladders on each side. Home bleachers are located along the southeastern side of the pool. An internal school road with 90-degree parking spaces separates the pool from the campus' southeast boundary. The pool area is enclosed by a 10-foot fence made of vertical metal bars combined with sections of chain-link fencing. There are four 20-foot-high light poles located approximately at each corner of the pool area.



Photograph 1: Glenn Kovas Aquatic Center, camera facing southeast, December 3, 2024.



Photograph 2: Glenn Kovas Aquatic Center, camera facing southwest, December 3, 2024.





Photograph 3: Glenn Kovas Aquatic Center, camera facing northwest, December 3, 2024.



Photograph 4: Glenn Kovas Aquatic Center, Scot's Gym background, camera facing northeast, December 3, 2024.



Photograph 5: Scot's Gym left frame and Glenn Kovas Aquatic Center snack shack right frame, camera facing northeast, December 3, 2024.

### **Project Description**

The project proposes to replace four existing light poles around the pool with new lighting poles. The existing lighting system is designed for pathfinding. The new lighting system would provide athletic light for nighttime pool activities. The new light poles would be 50 feet tall and fitted with Light-Emitting-Diode (LED) bulbs.

### **Secretary of the Interior Standards**

The Secretary of the Interior's Standards for the Treatment of Historic Properties provides guidelines for the preservation and rehabilitation of historic resources. Adherence to these standards is accepted as a method of avoiding significant adverse effects to historic buildings while allowing their continued use. The main purpose of the proposed project is to replace the existing lighting poles with new LED lighting poles that would allow for safe use of the Carlmont High School aquatic center at night.

The Secretary of Interior's Standards for Rehabilitation state:

*1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces and spatial relationships.*

The property was originally used as a school and will continue in that use. The area where the new lighting will be installed is an aquatic center constructed around 2006 and would continue in that use after completion of the proposed project; lighting system replacement would not alter the distinctive

materials, features, spaces, or spatial relationships of the campus areas constructed during the historic era.

Therefore, the proposed project conforms to Standard 1.

*2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided.*

The proposed project would not affect the historic character of the property. The proposed replacement of the light poles is a minimal alteration to a non-historic-era section of the campus. Since no changes are proposed to the historic-era area of the campus, all potential historic character-defining features of the campus (which would be discovered during a historical resource evaluation but are unknown at this time) would be retained. The proposed project would not alter the potential historic character of the property.

Therefore, the proposed project conforms to Standard 2.

*3. Each property will be recognized as a physical record of its time, place and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.*

The proposed project would not substantially impact the existing aquatic center facility buildings or structures. Conjectural features such as historicist architectural details would not be utilized in the proposed project in order to avoid creating a false sense of historical development.

Therefore, the proposed project conforms to Standard 3.

*4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.*

There are no changes to the property that have acquired historic significance in their own right.

Therefore, Standard 4 does not apply to the proposed project.

*5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.*

Neither the historic-era school campus buildings nor the aquatic center buildings would be altered, therefore the materials, features, finishes, and construction techniques would be preserved. The proposed lighting pole replacement would allow the property to continue its historic function.

Therefore, the proposed project conforms to Standard 5.

*6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.*

The project would not include repair or replacement of deteriorated features since the project would not alter the buildings themselves.

Therefore, Standard 6 does not apply to the proposed project.

*7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.*



No chemical or physical treatments will be utilized in potentially historic areas.

Therefore, Standard 7 does not apply to the proposed project.

*8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.*

The proposed project would not include excavation of previously undisturbed areas. If archaeological resources are encountered during excavation, appropriate mitigation measures would be developed.

Therefore, the proposed project conforms to Standard 8.

*9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.*

The project would not destroy any historic materials, features, and spatial relationships that characterize the property, since no changes to historic-era buildings are proposed. Visible alterations are minor features that would not overwhelm the potentially historic buildings or substantially alter their setting. Spatial relationships would be preserved, and new construction would be differentiated from old.

Therefore, the proposed project conforms to Standard 9.

*10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.*

Reversal of the proposed project would not impair the essential form and integrity of the potentially historic property.

Therefore, the proposed project conforms to Standard 10.

Overall, the project would have no negative impact on the historic-era school property. The replacement of the light poles in the aquatic center would allow the facility to continue in its use as a school aquatic center. The project would not have a negative impact on any historic features that may be present on historic-era campus buildings since no changes are proposed in the older areas of the campus. Likewise, the project would not have a negative impact on the potential historic setting. The project therefore conforms to the Secretary of the Interior's Standards for the Treatment of Historic Properties.

**The proposed project avoids negative impacts to historical resources or potential historical resources.**

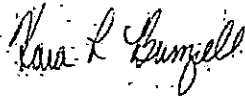
### **Preparer Qualifications**

I meet the Secretary of Interior's Professional Qualifications for both History and Architectural History. I hold a Master's degree in Public History and have worked in multiple facets of historic preservation and cultural resource evaluation since 2007. My experience includes municipal preservation planning and working as the lead staff member of a non-profit preservation

organization. Since 2012, I have worked full-time as a historical consultant, completing dozens of evaluations for CEQA and Section 106 compliance. Additionally, I have completed local and national register nominations, historic context statements, and Historic It American Engineering Record recordation. The North Bay is the center of my practice, but I frequently work in the greater Sacramento area and other parts of the Bay Area, and have also completed projects in Southern California, Nevada, Oregon, New York, and Puerto Rico. In addition to my work with historic-period domestic, agricultural, and commercial properties for private clients, I have prepared reports on post offices, military bases, university campuses, hospitals, church properties, national parks, and a NASA site. I am listed as a Historian and Architectural Historian on the California Office of Historic Preservation's roster of qualified consultants for every county in California.

Please contact me by phone at 707/290-2918 or e-mail at [kara.brunzell@yahoo.com](mailto:kara.brunzell@yahoo.com) with any questions or comments.

Sincerely,

A handwritten signature in cursive script that reads "Kara L. Brunzell".

Kara Brunzell, M.A.  
Brunzell Historical

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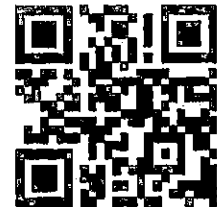
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