

# Boys and Girls Clubs of the Peninsula Orange Park Clubhouse Project

## CEQA Analysis

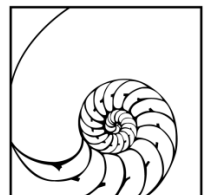
June 2025

Prepared for:

**City of South San Francisco**  
400 Grand Avenue  
South San Francisco, CA

Prepared By:

**Lamphier-Gregory**



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<b>Appendix A</b>	Lamphier-Gregory, CalEEMod Construction-Period Emissions Calculations, April 2025
<b>Appendix B</b>	Langan Engineers, Geotechnical Investigation of the BGCP Site, March 21, 2025
<b>Appendix C</b>	AST Inc. Geotechnical, Phase I ESA for the Boys & Girls Clubs of the Peninsula, February 2025
<b>Appendix D</b>	Preservation Architecture, Boys and Girls Club at 201 W. Orange Avenue Historic Resource Evaluation, February 18, 2024

## Project Information

- 1. Project Title:** Orange Park Clubhouse  
Boys and Girls Clubs of the Peninsula
- 2. Lead Agency Name and Address:** City of South San Francisco  
Planning Division  
400 Grand Avenue  
South San Francisco, CA 94080
- 3. Case Planner:** Adena Friedman, Chief Planner  
[adena.friedman@ssf.net](mailto:adena.friedman@ssf.net)
- 4. Project Location:** An approximately 3-acre site that includes two Assessors Parcels (a 2.75-acre portion of APN 093-331-110, and the 0.25-acre APN 093-331-150), with a primary address at:  
201 West Orange Avenue  
South San Francisco, California
- 5. Owner:** Property Owner: City of South San Francisco  
Current Buildings leased by Boys and Girls Clubs of the Peninsula
- 6. Project Sponsor:** Boys and Girls Clubs of the Peninsula  
Represented by: Derek K. Hunter, Hunter Properties  
[deke@hunterproperties.com](mailto:deke@hunterproperties.com)
- 6. Existing General Plan Designation:** Parks and Recreation
- 7. Existing Zoning:** Parks and Recreation (PR)
- 8. Requested Permits:** Design Review Permit  
  
Variance for development standards for interior side yard setback in the PR zone  
  
The Project will also require subsequent administrative permits for demolition, grading, stormwater control and building permits

## **I - Introduction**

### **Executive Summary**

The purpose of this document is to provide the required California Environmental Quality Act (CEQA) review for the Boys and Girls Clubs of the Peninsula's proposed redevelopment of the Orange Park Clubhouse (i.e., the Project). This document includes:

- A description of the proposed Project
- An assessment of whether the Project qualifies for a CEQA exemption pursuant to CEQA Guidelines Section 15332 as an Infill Development Project
- An examination of whether there are Project-specific significant effects that are peculiar to the Project or its site and that would pose an exception to a CEQA exemption pursuant to CEQA Guidelines Section 15300.2
- An assessment of whether the Project qualifies for CEQA streamlining and exemptions pursuant to CEQA Guidelines Section 15183 as a project that is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified

Applicable CEQA sections are further described below, each of which separately and independently provides a basis for CEQA compliance.

### **Project Overview**

The Boys and Girls Clubs of the Peninsula, and their representatives at Hunter properties (together, the Project applicant) wish to redevelop their existing Orange Park Clubhouse. The Clubhouse is located on an approximately 3-acre site leased from the City of South San Francisco, located within the Orange Park Sub-Area at 201 West Orange Avenue. The Project applicant seeks to demolish two of three existing buildings on this site, and to reconstruct new, larger, and more modern buildings to better accommodate their services and facilities. The third building would remain.

### **CEQA Conclusions of this Document**

#### **Infill Development Exemption**

Public Resources Code Section 21159.21 and CEQA Guidelines Section 15300 to Section 15333 include a list of classes of projects that have been determined to not have a significant effect on the environment and are therefore exempt from further review under CEQA. Among the classes of exempt projects are those projects identified as Infill Development (CEQA Guidelines section 15332, or Class 32 Exemptions). The Project's consistency with the requirements for a Class 32 Infill Development exemption are provided in this CEQA Checklist.

As fully evaluated in this analysis, the Project qualifies for exemptions from additional environmental review. The Project is consistent with the development intensity and land use characteristics established by the 2022 South San Francisco General Plan Update (SSF 2040 General Plan). The potential environmental impacts associated with infill development of recreational and civic uses within the City's parklands were adequately analyzed in the 2022 South San Francisco General Plan Update, Zoning Code Amendments and Climate Action Plan Environmental Impact Report (SSF 2040 General Plan EIR, State Clearinghouse Number 2021020064). The analysis contained in this CEQA document supports a determination that the Project qualifies for an exemption

from further environmental review as specified in CEQA Guidelines Section 15332 for Infill Development projects.

### **No Exceptions**

CEQA Guidelines Section 15300.2 identifies exceptions to an otherwise applicable CEQA exemption. These exceptions include projects with significant cumulative effects not otherwise addressed, projects with significant effects due to unusual circumstances, and projects that result in damage to scenic resources within a designated State Scenic Highway, that are located on a hazardous waste site, and/or that may cause a substantial adverse change in the significance of a historical resource. As analyzed in this CEQA document, there are no significant effects peculiar to the Project or its site, and no exceptions to a CEQA exemption pursuant to CEQA Guidelines Section 15300.2 apply.

### **No Additional Environmental Review Required**

This CEQA Analysis fully analyzes the environmental impacts of the Project to determine the most appropriate approach for its CEQA documentation and compliance. This analysis concludes that the Boys and Girls Clubs of the Peninsula Orange Park Clubhouse Project qualifies for a CEQA exemption pursuant to CEQA Guidelines Section 15332 as an Infill Development Project, no exceptions to that exemption apply, and no new or additional environmental document is required.

## II - Project Description

Boys and Girls Clubs of the Peninsula (BGCP) partners with local schools to expand students' school days and school years by providing after-school and summer programs. These programs are free, high quality and comprehensive services for students in kindergarten to and through college, including college placement.

The Orange Park Clubhouse of the Boys and Girls Clubs of the Peninsula (BGCP) has been in operation at the Orange Park site since the early 1960's. The existing Orange Park Clubhouse consists of a 3-building campus serving approximately 200 students in kindergarten through eighth grade (K-8). Building 1 is currently a single-story academic building and the Clubhouse main entry. Adjoining Building 2 is a high-bay gymnasium with a small two-story auxiliary classroom, office, and storage space. Building 3 is a small single-story structure primarily used for storage. The Orange Park Clubhouse is located on City-owned land that includes a common parking lot that also serves the adjacent Orange Memorial Park.

The BGCP seeks to improve its current space and to expand services to include an added 150 high school students, reaching 350 total kindergarten through high school students. Their proposed project (the Project) intends to demolish the existing Buildings 1 and 3, to be replaced with new 2-story wood framed buildings of a slightly larger footprint. Building 1 would serve K-8 students and house a kitchen, cafeteria, and an adjacent secure outdoor play/eating area. Building 3 would serve high school students and include a secure, flexible outdoor space for quiet enjoyment. Both new buildings would provide internal access to the existing Building 2 Gymnasium. Improvements to the existing Gymnasium are limited to cosmetic improvements. The Project's other proposed site improvements include re-stripping the existing parking lot, widening the perimeter concrete walkway, addressing accessibility per current code requirements, utility infrastructure improvements, adding a trash enclosure, and replacing the wooden good-neighbor fence at the northwestern property line.

This chapter describes the currently proposed physical change to the Orange Park site and the proposed increase in student participation (together, the Project) as evaluated in this CEQA Analysis. The following includes a description of the site and surroundings, existing site conditions, the proposed use of the site, and required Project approvals.

### **Project Location**

The existing BGCP's Orange Park Clubhouse is in the Orange Park sub-area located in the center of South San Francisco, next to the Downtown, Lindenville, Avalon-Brentwood, and El Camino Real sub-areas. The Orange Park sub-area is split between single-family residential, and public parks land uses, including Orange Memorial Park (see **Figure 1**). As of 2021 the Orange Park sub-area contained about 5% of the City's population.

Orange Memorial Park is South San Francisco's first and largest developed park, and as a community park it serves a citywide population. Orange Memorial Park includes ballfields, tennis courts and outdoor basketball courts; picnic shelters and bar-b-que areas; a children's play area and outdoor gym equipment; a sculpture garden; and a community swimming pool. The Project site is located within a linear strip of City-owned land immediately to the southwest of Orange Memorial Park, separated from the main portion of the park by the eucalyptus-lined Memorial Drive and the Centennial Way Trail (below which lies the underground BART tunnel).





Other adjacent land use includes a row of six single-family homes on C Street to the west, the Good News Chapel to the southwest, and the Los Cerritos Elementary School to the south, on the opposite side of West Orange Avenue on C Street (see **Figure 2**). The Project site is located about 250 feet walking distance from Los Cerritos Elementary School, about 1,275 feet walking distance from the South San Francisco High School, about 2,500 feet walking distance from the new South San Francisco Library | Parks and Recreation Center at 901 Civic Campus Way, about 3,500 feet walking distance from Ponderosa Middle School, and about 3,900 feet walking distance from Parkway Heights Middle School. The Project site is about 1.3 miles from the South San Francisco BART station via Centennial Way Trail and is located adjacent to the SamTrans school-oriented Bus Route 37, which provides school bus service to Alta Loma Middle School, Spruce Elementary School and the South San Francisco High School, with a bus stop at the corner of West Orange Avenue and C Street.

### **Project Site, Existing**

The existing BGCP Orange Park Clubhouse occupies an approximately 3-acre site that includes a 2.75-acre portion of APN 093-331-11 and the 0.25-acre APN 093-331-150, with a primary address at 201 West Orange Avenue. The BGCP leases the Orange Park Clubhouse site from the City of South San Francisco, which owns the much larger 2.75-acre APN 093-331-11 property and the 0.25-acre APN 093-331-150 property, as well as other properties comprising Orange Memorial Park to the northeast.

The current Clubhouse is housed in three adjacent 1-story buildings with approximately 21,300 square feet of facility space (see **Figure 3**), including:

- a one-story 9,500 square-foot Clubhouse (Building 1)
- a nearly 9,400 square-foot, two-story tall gym (Building 2), and
- a one-story 2,400 square-foot garage/storage space (Building 3)

The existing Clubhouse building was constructed in 1961, and the gym and storage building (Buildings 2 and 3) were constructed at or about the same time.

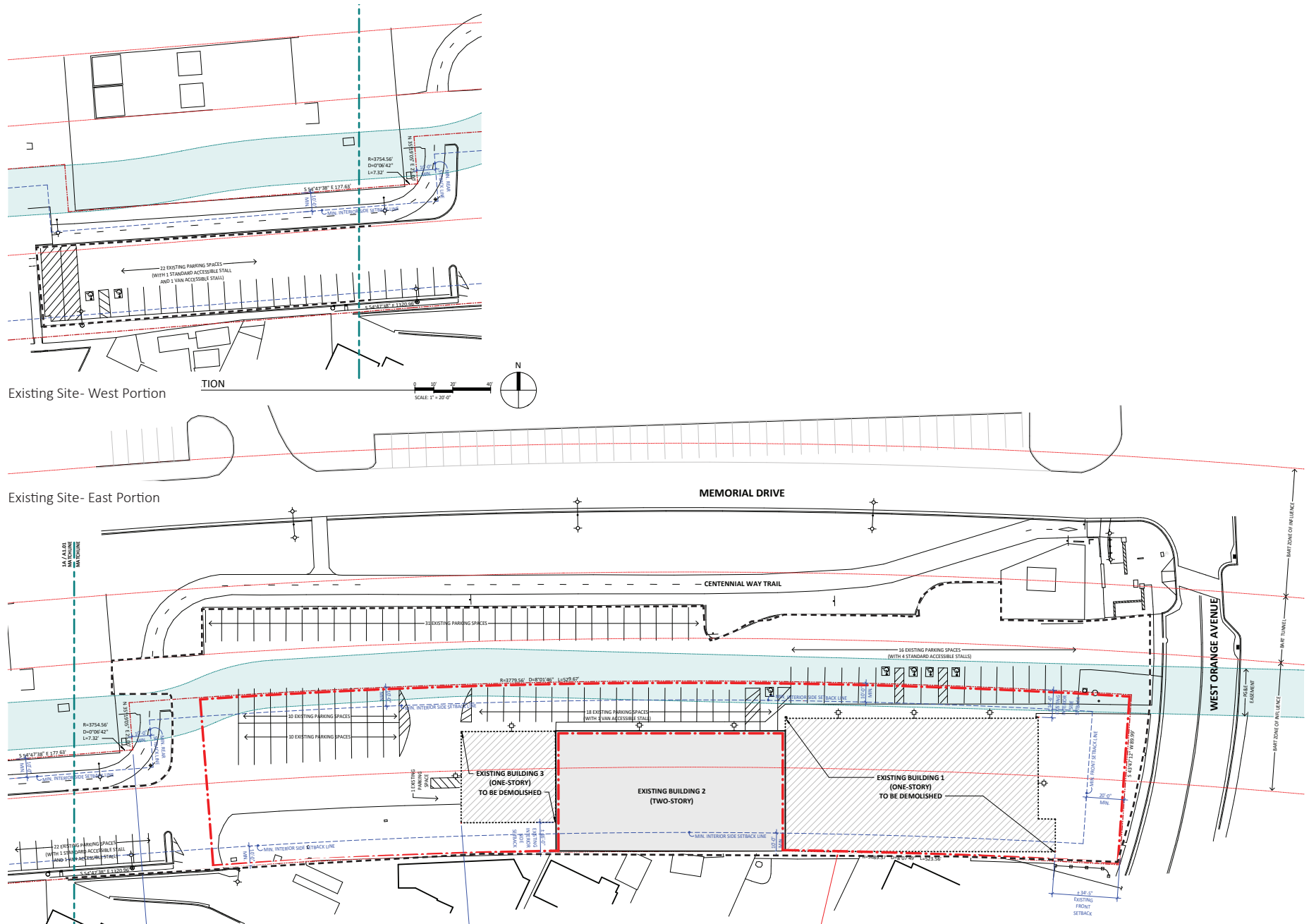
A drive-aisle with ingress/egress onto West Orange Avenue provides access to the existing Clubhouse, with 34 existing parking spaces (including 4 ADA-accessible parking spaces and one van-accessible space) located along the front of the Clubhouse. An additional 74 parking spaces are found along the north and westerly portions of the site. Parking is shared between the Clubhouse and Orange Memorial Park.

The current BGCP Orange Park Clubhouse is a hub of community activity, with programs that run six days a week, serving up to its maximum capacity of 150 youth members daily, with 420 more members active in various BGCP-sponsored sports leagues.



**Figure 2**  
**Project Site and Adjacent Land Uses**

Source: BGCP, DevCon, Site Photo, Sheet A1.00, 11/20/24



**Figure 3**  
**Existing Site Improvements, Orange Park Clubhouse**

Source: BGCP, DevCon, Existing Site Plan, Sheet A1.01, 2/21/2025



## **General Plan and Zoning**

### **General Plan Land Use Designation**

The Project site has a General Plan land use designation of Parks and Recreation. This land use designation encompasses the larger Orange Memorial Park to the northeast, as well as the long open space corridor along the Centennial Way Trail/underground BART tunnel alignment. The Parks and Recreation land use designation is described as providing for parks, recreation complexes, public golf courses, and greenways.

The BGCP facility is consistent with this land use designation as a recreational complex with social, academic, and career building mentorships, including the Barry Carr Sports Leagues, which ensures that all youth can access competitive sports where students exercise, learn life skills, and have fun playing sports like soccer, futsal, basketball and flag football.

### **Zoning**

The Project site is in South San Francisco's Parks and Recreation (PR) zoning district. The PR District is reserved for parks and recreation facilities, including parks, public golf courses, and greenways.

- Public Park and Recreation Facilities are a permitted use in the PR zone
- Indoor Sports and Recreation uses are a permitted use within the PR zone - these uses include playing fields, courts, gymnasiums, swimming pools, picnic facilities, tennis courts, golf courses, and botanical gardens, as well as related food concessions or community centers
- Daycare facilities are a permitted use within the PR zone

The after-school programming that the BGCP provides falls within the category of a daycare facility, as it is non-school programming for children and is providing care for children outside of the normal school day, and is a permitted use in this zone. The Project's gymnasium fits the definition of a Park and Recreation facility for indoor sports and recreation, and is a permitted use in this zone.

## **Detailed Project Description**

The proposed Project involves two components:

- replacing the existing 1-story Clubhouse (Building 1) with a new, 2-story Clubhouse for K-8 grades, and replacing the existing small garage/storage space (Building 3) with a new 2-story Teen Center for high school students, and
- increasing the number of students served at the BGCP Clubhouse from 200 to 350, with an expected addition of up to 150 new high school-aged students (an increase of 150 students, or a 75 percent increase in the number of students served by the BGCP).

The specific components of the Project are further described below.

### **Demolition**

The first phase of construction of the Project involves demolition of the 1-story, 9,500 square-foot Clubhouse (Building 1) and the one-story 2,400 square-foot garage/storage space (Building 3). To the extent that these buildings (which were originally constructed in the 1960s) may have asbestos-containing building materials, lead based paint or other hazardous building materials, these materials will be removed and disposed of in accordance with existing hazardous waste regulations.

## **New Construction**

### **Building 1**

New Building 1 will be constructed within approximately the same 9,500 square-foot building footprint as the existing Building 1 (see greater detail in subsequent Figure 11), but will be replaced with a new 2-story (30-foot tall) structure of 19,720 square feet (9,990 square feet on the first floor and 9,730 square feet on the second floor). The new Building 1 is intended to serve students in grades K-8 and will include a main lobby, a kitchen and cafeteria, several multi-purpose rooms, elementary leadership offices, and restrooms. The second floor will include a boardroom/study hall, middle school leadership offices, several multi-purpose rooms, open game and recreations space, restrooms and administration offices. An elevator and 2 internal staircases will provide access to the second floor (see **Figure 4**).

The primary finishes for the exterior of Building 1 would be dark grey and off-white plaster walls with copper and bronze-colored painted panels, and with dual-glazed clear glass storefront window systems. Silver-colored Boys and Girls Club signage and address board will be mounted to the façade (see **Figure 5**). Signage is not included in the current entitlements. Any desired signage will require sign permits per South San Francisco Municipal Code Section 20.360.

### **New Building 3**

New Building 3 (the Teen Center) will be constructed at the generally same location as the former 2,400 square-foot Building 3 (see greater detail in subsequent Figure 11), but as a larger 2-story, 30-foot tall structure of 9,770 square feet (4,960 square feet on the first floor and 4,810 square feet on the second floor). The new Building 3 is intended to serve high school students and will include a lobby, high school leadership team offices, a student lounge and game room, multi-purpose rooms and restrooms on the first floor. The second floor will include a high school library/academic support space, a technology room, multi-purpose rooms and group study areas. An elevator and 2 internal staircases will provide access to the second floor (see **Figure 6**).

The primary finishes for the exterior of Building 3 would be dark grey and off-white plaster walls with copper and black colored painted panel accents, and with dual-glazed clear glass storefront window systems. Silver and black colored metal signage will be mounted to the façade (see **Figure 7**).

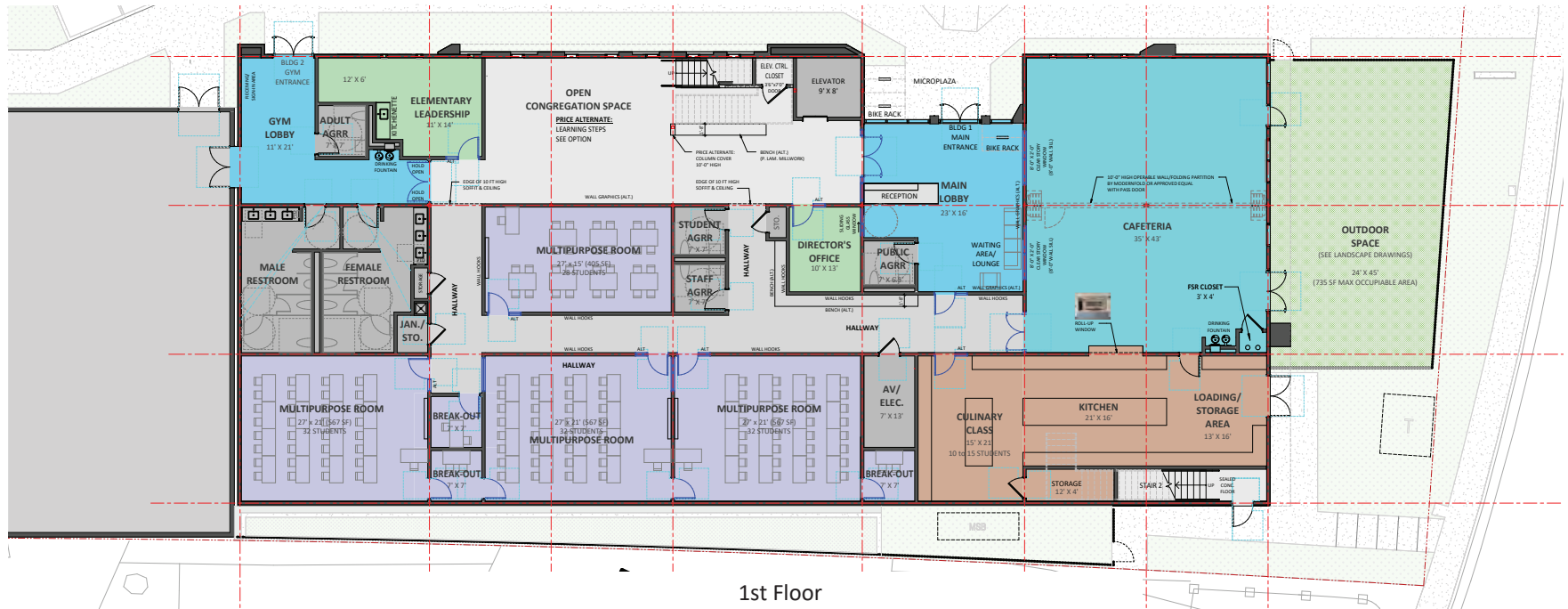
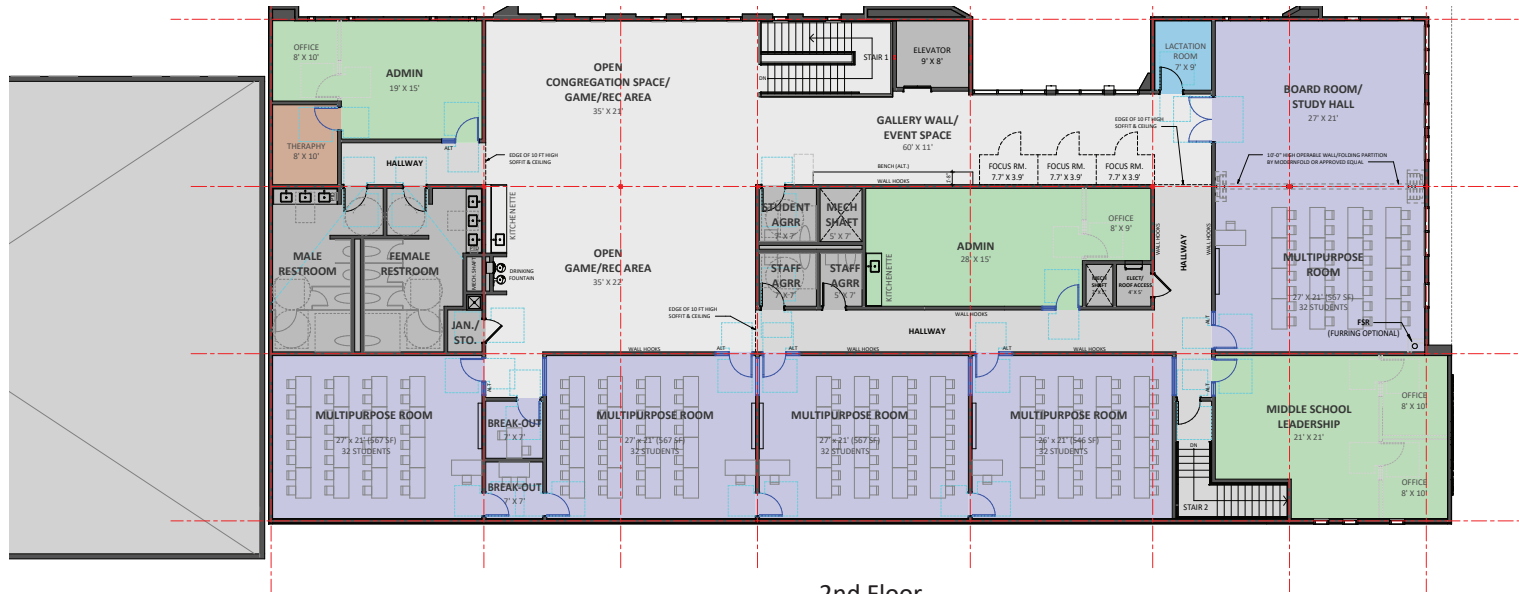
### **Gymnasium (Building 2)**

Exterior improvements to the existing gymnasium are expected to be limited to new paint and signage, but may also include window replacement, new roofing and perhaps skylight replacement.

## **Site Work**

### **Demolition, Grading and Foundations**

Demolition of existing Buildings 1 and 3 will include the removal of existing structures and foundations, pavements, and underground obstructions. Any vegetation and organic topsoil will be stripped in areas to receive new site improvements. Buried foundations from this structure and possibly previously existing structures may require the use of jackhammers to break apart and remove. Care will be taken to reduce vibrations when removing obstructions from the site, and equipment capable of generating large vibrations (such as hoe-rams) will not be used.



**Figure 4**  
**Orange Park K-8 Clubhouse (Building 1), Floor Plans**

Source: BGCP, DevCon, Building 1 Plans, Sheets A2.21 and A2.22, 2/21/25



Building 1- Northeast Facade Rendering

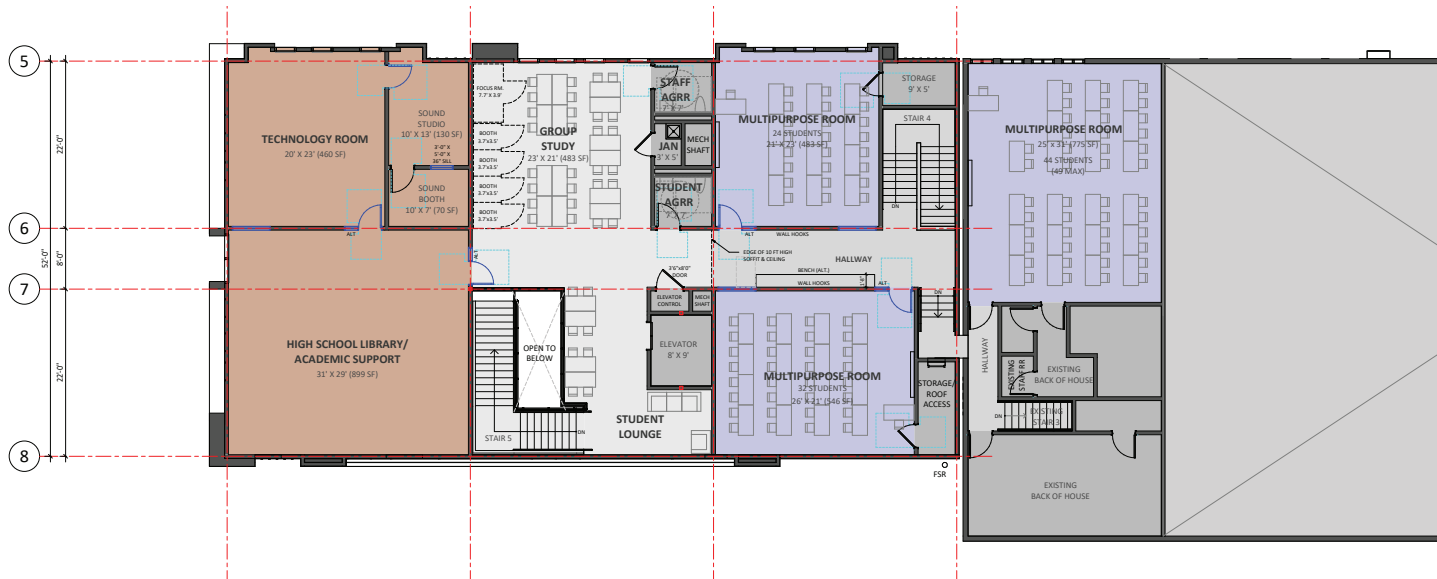
Building 1- East Facade Rendering



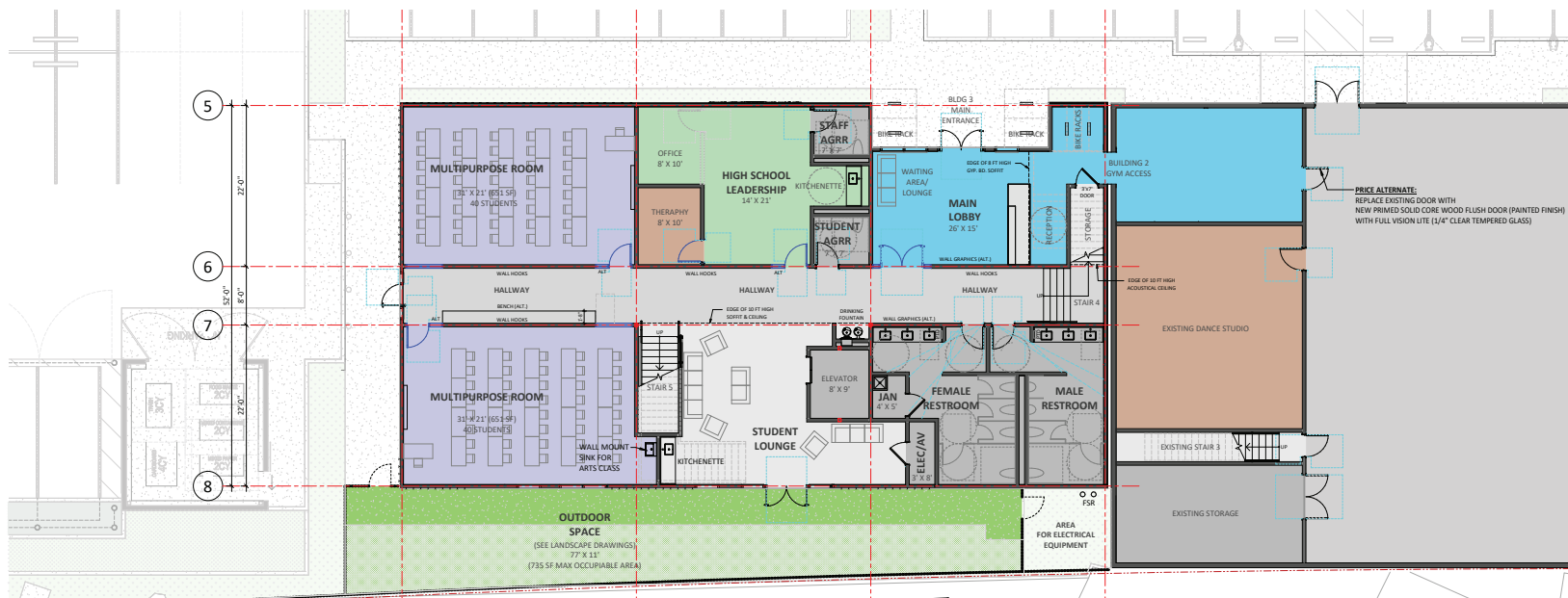
**Figure 5**  
**Proposed New BGCP Orange Clubhouse, Building 1 Renderigs**

Source: BGCP, DevCon, Building 1 Renderings, Sheet A3.01, 2/21/2025





2nd Floor



1st Floor

Figure 6  
Orange Park Teen Center (Building 3), Floor Plans

Source: BGCP, DevCon, Building 3 Plans, Sheets A2.24 and A2.25, 2/21/25





**Figure 7**  
**Proposed New BGCP Teen Center, Building 3 Rendering**

Source: BGCP, DevCon, et.al., Building 3 North Elevation, Sheet A3.04, 2/21/2025

The proposed new buildings will be constructed at grade, with the same finished floor of the existing buildings, at elevation of approximately 30 feet. The new buildings will be supported on continuous and isolated spread footings, with a floor slab designed to bear on grade, which is similar to the existing building's floor slab design. A moisture barrier will be placed directly beneath the slab.

Accordingly, site grading for the Project will be limited to minor backfill for utility trenches and minor grading for the building pad, flatwork, and hardscapes.

### Landscape

Landscape plans for the new Clubhouse buildings (see **Figure 8**) include new concrete paving pedestrian walks around the perimeter of the front (north) and sides (east and west), separated from the building by new irrigated planting areas. The easterly side of the site at the new Clubhouse will include a new outdoor cafeteria space with artificial turf surface, enclosed within a 7-foot metal fence. The westerly side of the site at the new Teen Center will include a new landscape consisting of 7 new trees to provide screening along the rear lot line, and new accent trees and a screening hedge along the westerly façade, where a new trash enclosure will be located. The westerly side of the site will also include a new stormwater treatment area (bioretention area) per the civil engineer's recommendations. Along the rear lot line will be a new outdoor space of artificial turf, and the existing wood fence will be replaced with a new 6-foot-high wood "good neighbor" (i.e., non-porous) fence for noise attenuation.

All planted area will include an automatic underground irrigation system designed for water efficiency in compliance with State and Water District water conservation measures.

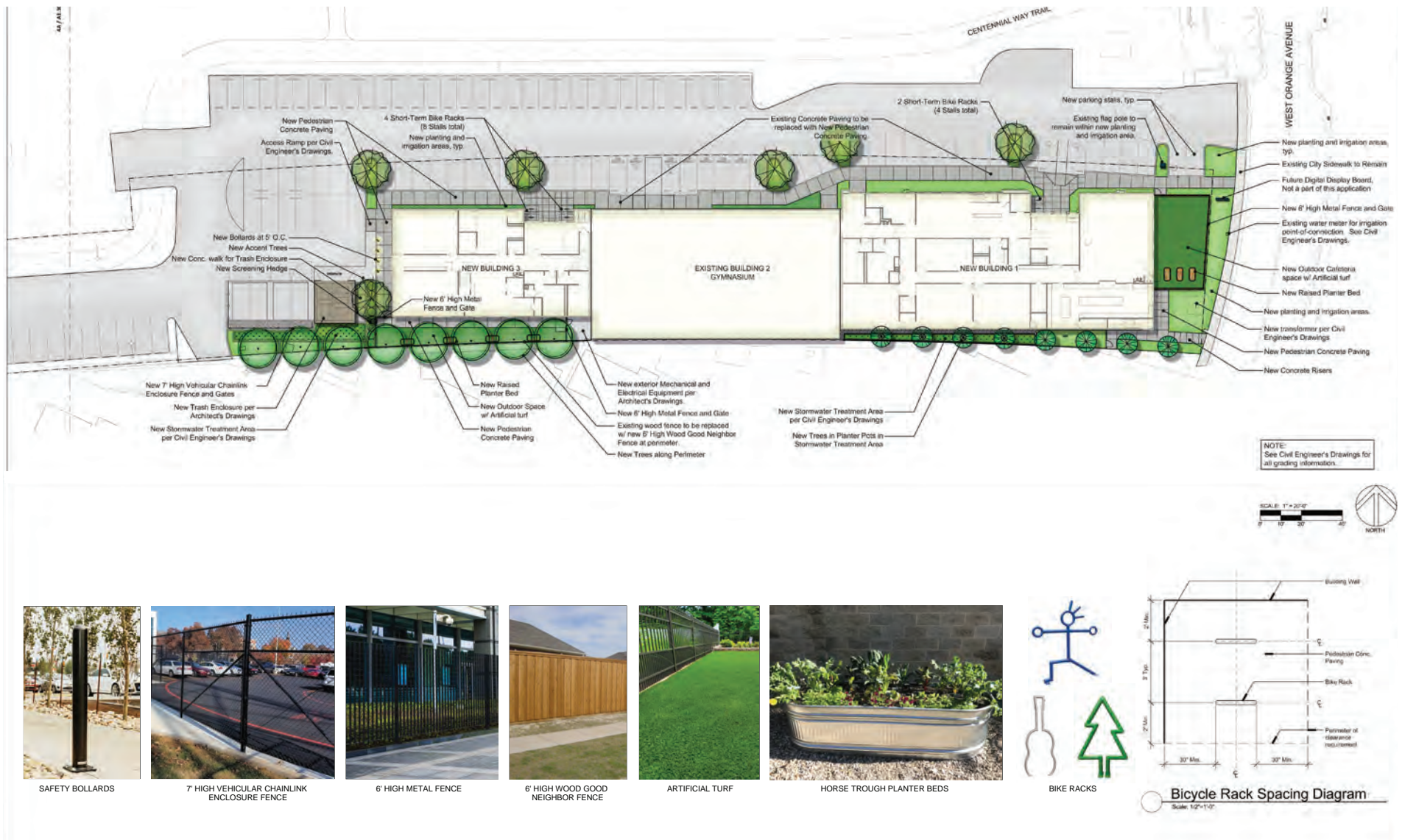
### Parking

Within the boundaries of the Project site there are 108 total existing parking spaces, most of which are used as parking for the adjacent Orange Memorial Park. The current BGCP Orange Clubhouse staff typically relies on use of those parking spaces nearest to the Clubhouse.

The Project proposes to realign and restripe those parking stalls located across the front of each of the three buildings (new Buildings 1 and 3 and the existing Gym) to accommodate its own parking needs. The design plan shows 41 parking spaces located across the front of these buildings, and a small parking area to the west of Building 3 to accommodate four vans. To meet current accessibility requirements and electric vehicle requirements for the Project's proposed 41 standard (non-van) parking spaces, the Project's parking spaces will include:

- 2 ADA-accessible parking spaces (one van and one standard size) located at the front of the existing Gym, mid-way between the entrances to new Buildings 1 and 3, and 2 ADA accessible parking space located in front of new Building 1.
- One ADA-accessible parking space and the adjacent standard parking space in front of the Gym will be equipped with electric vehicle supply equipment (EVSE) capable of supplying electricity to electric vehicles.
- 6 other parking spaces will be equipped as future EV charging spaces (EVCS), with raceways providing wiring from the building's electrical panel to a service box near the EVCS spaces and with a dedicated circuit for future service of the EVCS.
- The remaining 31 parking spaces across the Project's frontage will be re-stripped to accommodate standard sized vehicles.





**Figure 8**  
**BGCP Orange Park Clubhouse, Landscape Plans**

Source: BGCP, DevCon, Landscape Layout Plan, Sheets L1.0, 2/21/2025

The Project will also re-stripe the entire parking area within its boundaries (which includes approximately 140 other parking spaces) to better define the existing parking spaces as separate from the drive aisles and establishing a more clearly defined circulation route through the site for student drop-off and pick-up. For special events or occasions when student parking exceeds the Project's parking supply, these other 140 city-owned parking spaces will remain available for such public use.

The Project would also provide 12 short-term bike-parking stalls and 6 long-term bike-parking stalls at the main entrances and lobbies of Building 1 and Building 3.

#### Utilities

The existing Orange Park Clubhouse is served with water via an existing 12-inch water main within the West Orange Avenue right-of-way and is served with sewer service via an existing 10 sanitary sewer line adjacent to the Clubhouse, between the existing Building 1 and West Orange Avenue. The proposed Project will similarly rely on these existing utility mains to provide water and sewer service to the new buildings, at new connection points within the building. New Building 1 will also require a new fire service connection to the existing 12-inch water main, including installation of a new fire hydrant.

For new Building 3, new water, sewer and stormdrain connections are required. There is an existing 8-inch water main within the C Street right-of-way, and the Project would include a new domestic water line and a new fire service line connection to this water main. There is an existing sanitary sewer utility hole at the southwesterly corner of Building 3, which connects to an 8-inch sanitary sewer line located at the terminus of C Street. The Project would include a new sanitary sewer connection to this existing sewer line at the utility hole.

The C Street right-of-way also includes an underground 12" stormdrain line. The Project's plans for Building 3 include constructing new stormdrain lines along the north, east and south facades of Building 3 that collect stormwater runoff from the roof and site improvements, convey this runoff to a flow-through planter for biofiltration, prior to discharge into this 12" stormdrain line.

Orange Park Clubhouse is also served with electrical service via a take-off from the existing overhead power lines along the west side of West Orange Avenue. To best serve the new Project, a new electrical transformer is proposed to be located on a transformer pad at the southeasterly corner of Building 1, nearest the overhead lines.

### **Increase in Staff, Students and Services**

#### Students and Services Increase

An important part of the proposed Project is the expectation that the BGCP will be able to better serve South San Francisco's high school student population with construction of the new Teen Center (Building 3). Specifically, BGCP anticipates an increased student population from 200 current K-8 grade students, to 350 students total (200 K-8 students and 150 high school students).

The types of programs offered to K-8 grade students include academic tutoring to help elementary students build foundational math and literacy skills, enrichment programs like coding, sports leagues and photography; and restorative community circles for students to build and strengthen relationships while practicing social-emotional skills. The types of new programs offered to the new high school students include:

- targeted intervention designed to enhance student engagement at school through relationship building, problem solving, resource linkage, academic support, and college/career exposure
- enrichment programs like culinary, sports leagues and graphic design
- career development opportunities through career panels, summer apprenticeships, summer internships, job shadowing and career mentorship, and

- free mental health services to students through one-on-one therapy and group counseling <sup>1</sup>

#### Staff Increase

Currently, the BGCP Orange Park Clubhouse is staffed with approximately 15 employees as teachers, mentors and administrative staff. With the addition of 100 high school students, the BGCP estimates they will increase staff with an additional 10 positions, for a total on-site staff of 25.

#### **Required Project Approvals**

The Project requires the following discretionary actions and approvals from the City of South San Francisco prior to implementation:

- Design Review permit
- Approval of a variance for a reduced interior side yard setback along the southerly lot line

The Project applicant has applied for a variance to reduce the side yard setback behind a portion of new Building 1 to just 5 feet (rather than the zoning standard of 10 feet), to be able to reconstruct the new Clubhouse (new Building 1) on approximately the same footprint as the existing Building 1 and without encroaching into the PG&E easement and minimizing encroachment into the BART Zone of Influence.

The Project will also require subsequent administrative permits for demolition, grading, stormwater control, and building permits.

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<sup>1</sup> BGCP, accessed at: <https://www.bgcp.org/programs>

### III - Project’s Consistency with the General Plan and Zoning

In 2022, the City of South San Francisco adopted the City of South San Francisco’s 2040 General Plan Update (SSF 2040 General Plan). The SSF 2040 General Plan presents South San Francisco’s vision for the next two decades and, “provides a roadmap for the City to implement policies and actions that create a resilient community, improve the quality of life of its residents, and expand economic development opportunities.”

The following analysis has been conducted to determine whether the proposed Project is consistent with the land use and development assumptions and improvement strategies of the SSF 2040 General Plan, and applicable zoning provisions and development standards of Title 20 of South San Francisco Municipal Code (SSFMC), as updated commensurate with the SSF 2040 General Plan. To be considered eligible for CEQA exemptions and streamlining pursuant to CEQA Guidelines Section 15332, the Project must be consistent with the development density established by existing zoning and the General Plan’s density-related policies for which the SSF 2040 General Plan EIR was certified.

#### Consistency with SSF 2040 General Plan Update

##### Land Use Policies

The Project site and surrounding area to the northeast (Orange Park) has a General Plan land use classification of Parks and Recreation, intended to accommodate parks, recreation complexes, public golf courses and greenways (see **Figure 9**).

**Consistency:** The Project is consistent with this land use classification. The Project includes a recreational complex (Building 2 – the Gym), provides sponsorship of recreational programming (the Barry Carr sports leagues that rely on recreational facilities provided at the adjacent Orange Memorial Park, and provides a location for after-school social and academic programs for students from grades K through high school. The BGCP has operated the Orange Park Clubhouse at this location since the early 1960s, and the Project provides a continuation, expansion and improvement to these on-going activities.

**FAR:** The Parks and Recreation land use classification does not provide a maximum building intensity for recreation complexes or facilities such as the Project.

**Consistency:** Whereas no maximum building intensity is proscribed, the Project represents a relatively low FAR across the 3-acre Project site, as calculated in **Table 1**.

**Table 1: Existing vs Proposed Building SF and FAR**

<u>Existing Conditions</u>	<u>Bldg. SF</u>	<u>Proposed Project</u>	<u>Bldg. SF</u>
Building 1	9,570	Building 1	19,720
Building 2	9,380	Building 2	9,380
Building 3	2,430	Building 3	9,770
Total / FAR (assuming 3-acre Project site)	21,380 / 0.16 FAR	Total	38,870 / 0.30

Source: BGCP and DevCon, *Orange Park Clubhouse Application*, Sheet A0.00, 2/21/25





**Figure 9**  
**General Plan Land Use Designations**

Source: City of South San Francisco Zoning App, accessed at:  
<https://experience.arcgis.com/experience/f8cc96713dc94ff981cb319c7ba82936>

### **Policies Related to Orange Park and Recreation**

Orange Park Vision Statement: “Orange Park is a high-quality place to live, learn, work and play, and residents have ample opportunities to enjoy South San Francisco’s recreational amenities, including Orange Park, Colma Creek, and the Centennial Way Trail.”

**Consistency**: The Project provides South San Francisco students with an improved, high-quality place to learn and play, where these students will have ample opportunities to appreciate the adjacent Orange Park, and where pedestrian access is available via the adjacent Centennial Way Trail.

Sub-Area Goal SA-31: Pedestrian connections, recreational amenities, and streetscapes are improved in Orange Park.

Policy SA-31.1, Implement Orange Memorial Park Master Plan: Continue efforts to implement the Orange Memorial Park Master Plan. Continue to implement stormwater capture projects like the Orange Memorial Park updates to improve water quality and increase trash capture in the Colma Creek watershed.

Action PR-2.1.2: Complete the Orange Memorial Park Master Plan.

**Consistency**: As part of the City’s overall properties associated with Orange Park, the Project represents an improved recreational and learning space to complement the City’s other planned improvements in the park.

GOAL PR-4: The City collaborates with a strong network of partners to improve and expand park and recreational opportunities across South San Francisco.

Action PR-4.2.2, Provide Recreational Programing in Joint Use Facilities: Coordinate with the South San Francisco Unified School District and San Mateo County Health Department, as well as local health providers and other community organizations, to provide recreational programming not offered in nearby public parks or recreation centers, such as after-school fitness and education programs.

**Consistency**: The Project represents a collaboration between the City (as underlying property owners) and the BGCP to provide improved recreational programming not offered in other nearby public parks or recreation centers, such as after-school fitness and education programs.

### **Project’s Consistency with Zoning**

#### **Permitted Land Use**

The Project site is zoned as Parks and Recreation (PR) zoning district (see **Figure 10**). The PR District is reserved for parks and recreation facilities, including parks, public golf courses, and greenways.

- **Consistency**: Indoor Sports and Recreation uses are a permitted use within the PR zone - these uses include playing fields, courts, gymnasiums, swimming pools, picnic facilities, tennis courts, golf courses, and botanical gardens, as well as related food concessions or community centers. The Project’s existing gymnasium fits the definition of a Park and Recreation facility for indoor sports and recreation and is a permitted use in this zone. The Project is characterized as a daycare facility, which is a permitted use within the PR zone. The after-school programming that the BGCP provides falls within the category of a daycare facility as it is non-school programming for children, and is providing care for children outside of the normal school day.





**Figure 10**  
City of SSF Zoning Districts

Source: City of South San Francisco Zoning App, accessed at:  
<https://experience.arcgis.com/experience/f8cc96713dc94ff981cb319c7ba82936>

## Development Standards

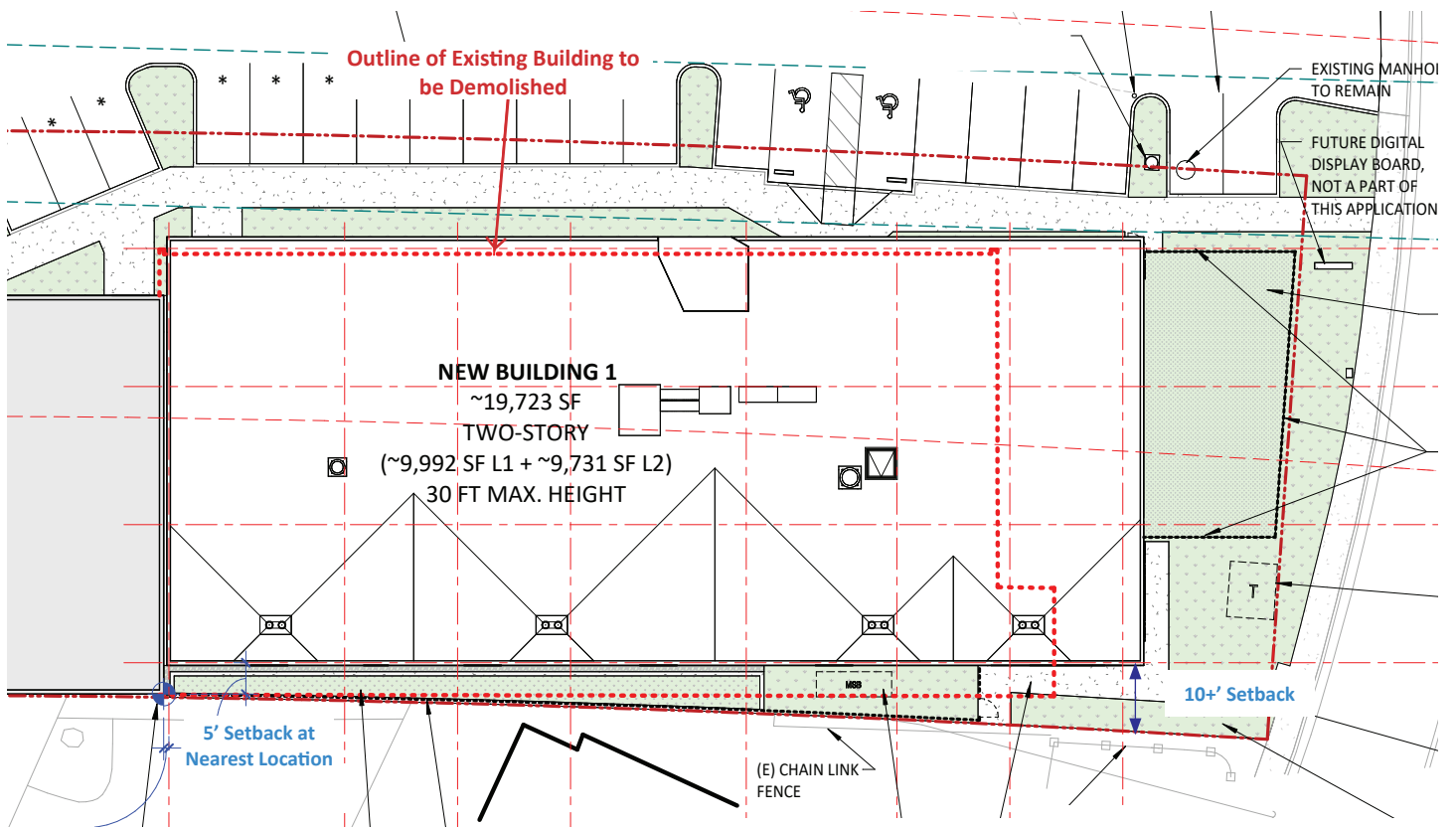
Table 20.110.003 of the SSF Zoning Ordinance establishes the development standards applicable to all Civic-related zoning districts. The following **Table 2** demonstrated the Project’s consistency with the development standards of the Park and Recreation (PR) district.

<b>Table 2: Project’s Consistency with PR Zoning Standards</b>		
<b>Standard</b>		<b>Project as Proposed</b>
Lot Size (Min. Lot Area)	43,560 sf	129,800 sf - <b>Consistent</b>
Max. Lot Coverage	25%	17% (22,627 sf) - <b>Consistent</b>
Max. Main Building (ft)	30 ft	30 ft (2 stories) - <b>Consistent</b>
Min. Front Setback	20 ft	20.5-foot minimum setback from West Orange Avenue - <b>Consistent</b>
Min. Interior Side Setback	10 ft	Building 1 is proposed with a minimum 5 ft setback from the property line abutting a residential district - <b>Variance Requested</b> The existing Gym (Building 2) has no existing setback from the rear property line abutting a residential district, and will remain as-is – <b>Consistent as Legal Non-Conforming Use</b> The proposed new Building 3 will have a minimum 10-foot setback from the abutting residential district - <b>Consistent</b>
Min. Street Side Setback	10 feet	NA
Min. Rear Setback	0 ft; 10 ft when abutting a residential district	10 ft. - <b>Consistent</b>
Min. Landscaping	-	The Project provides approximately 8,450 sf of new landscaped area within the site (3,110 sf t new Building 1, 120 sf in front of the Gym, and 5,220 sf at new Building 3) - <b>Consistent</b>

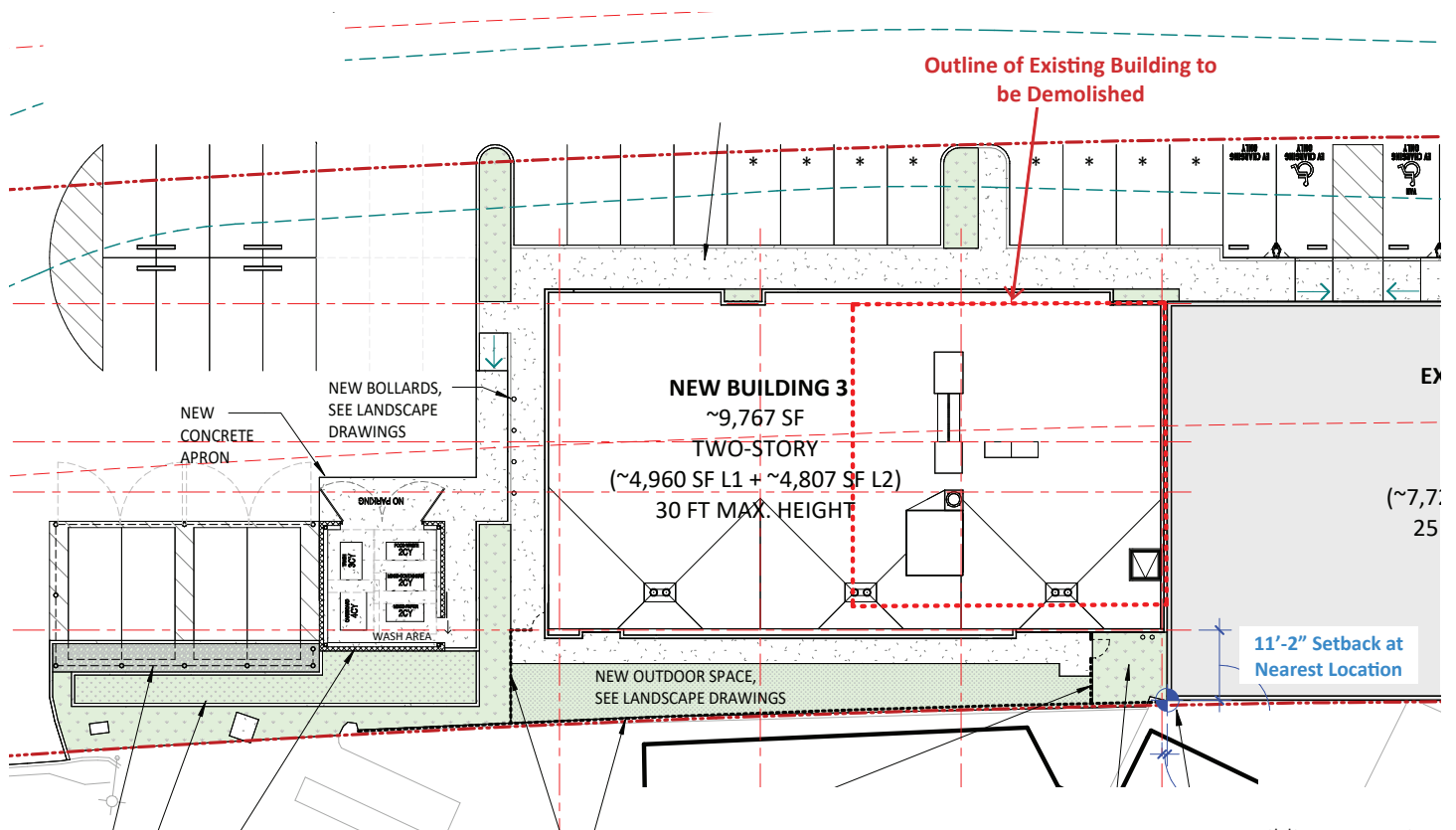
Pursuant to SSF Zoning Code section 20.320.002, any lawfully established use, structure or lot that is in existence but does not comply with all the standards and requirements of the zoning Code shall be considered non-conforming. Nonconforming uses and structures may be continued and maintained, provided there is no alteration, enlargement or addition to any building or structure; no increase in occupant load; nor any enlargement of the area, space or volume occupied by or devoted to such use. The existing Gym (Building 2) does not have a rear setback from the property line, but it is not proposed to be enlarged or materially altered pursuant to the Project. Accordingly, the existing Gym is considered a legal, non-conforming use, and is not inconsistent with zoning.

Building 1 is proposed with a minimum 5-foot setback from the property line abutting a residential district at its nearest, westerly corner (where the existing building has no setback), increasing to a 10-foot setback at its easterly corner near West Orange Avenue (where the existing building has an approximate 5-foot setback), as shown in **Figure 11**. Accordingly, the Project applicant has applied for a variance to reduce this side yard setback. Moving the location of proposed new Building 1 further towards the front parking area to provide a deeper side yard setback would result in an encroachment into the existing PG&E easement and further encroachment into the BART Zone of Influence area.

The proposed new Building 3 will have a minimum 10-foot setback from the abutting residential district, and be fully consistent with the side setback standard (see also Figure 11).



New Building 1 Location



New Building 3 Location

**Figure 11**  
Proposed New Buildings Relative to Existing Buildings and Setbacks

Source: BGCP, DevCon, Site Plan, Sheet A1.10, 2/21/2025

### Parking

The SSF Municipal Code Table 20.330.004 identifies the number of required parking spaces for a wide variety of land use types, providing that projects shall provide no more than the number of on-site parking spaces based on the particular characteristics of the proposed use. The BGCP Orange Park Clubhouse Project is a unique land use type not specifically identified in the Code requirements. The following is an estimate of the Project’s parking demands based on a best fit to the types of land uses identified in Table 20.330.004.

Building 1 is proposed as a new Clubhouse for students in grades K-8, and its parking needs are most similar to a day care facility, with the only parking needs being those of its staff. Per Table 20.330.004 of the SSF Municipal Code, the parking requirements for a day care use are 1 parking space per employee, plus any additional parking pursuant to a Pick-Up/Drop-Off Plan.

**Consistency:** Whereas the new Building 1 Clubhouse does not propose any increase in staffing or students in the K-8 grades, its parking demands will be similar to existing conditions, with a maximum demand for up to 15 employees. The Project does include a Pick-Up/Drop-Off Plan, whereby parents/guardians access the existing drive aisle at West Orange Avenue and make a circular loop through the parking lot to pick-up K-8 grade students in front of the new Building 1, and exit back out onto West Orange Avenue. Accordingly, the parking demand for Building 1 is approximately 15 parking spaces.

New Building 2 is proposed as a Teen Center for high school students, and its parking demands are likely to be most similar to a high school. According to Institute of Transportation Engineers (ITE) parking rates, high schools generate a total parking demand ranging between 0.16 and 0.32 parking spaces per student, depending on whether its location is in an urban or suburban location. This parking demand accounts for the total parking demand including teachers, staff and students.

**Consistency:** Whereas the new Building 3 Teen Center will serve high school students and will be located in close proximity to the SSF high schools that it serves, in an area well served by transit, and in an urban location, the applicable ITE parking rate for Building 3 is approximately 0.16 parking spaces per student. With 150 new high school students served by the Teen Center, its corresponding parking demand is estimated at 24 parking spaces. This would provide approximately 10 parking spaces for BGCP staff, plus 14 spaces for high school student parking.

Based on these calculations, the Project’s total parking demand is estimated to be 39 parking spaces, and the Project proposes to provide 41 parking spaces across the front of its new buildings and the existing Gym, roughly equivalent to its estimated demand.

### *ADA Compliant Parking*

Title 24, Table 11B-208.2 of CalGreen specifies requirements for ADA/handicap accessible parking. Pursuant to this Table, parking lots with between 25 and 50 parking spaces shall provide a minimum of 2 accessible spaces provided on the site.

**Consistency:** The Project proposes to provide 2 accessible parking spaces, including 1 accessible van parking space, both located at the front of the existing Gym mid-way between the entrances to new Buildings 1 and 3, consistent with this requirement.

### *Electrical Vehicle Charging Stations*

Per Section 20.330.008 of the SSF Municipal Code, the total number of required EV charging station spaces are specified in Table 20.330.008, or in accordance with the most current California Green Building Standards Code, whichever standard is greater. Table 20.330.008 identifies the requirement for 2 EV charging spaces where the total number of required or maximum parking spaces is between 26 and 250 for non-residential uses. Similarly, CalGreen Table 5.106.5.3.1 identifies the requirement for 2 EVSE charging spaces (with supplying electricity)

where the total number parking spaces provided in a parking facility is between 26 and 50, and 8 EVCS spaces (with EV-capable raceways and electrical panel capacity) for a parking facility of between 26 and 50 spaces. The number of required EVSE spaces provided count toward the total number of required EVCS capable spaces.

Per Section 20.330.008.c, where accessible parking requirements are required, at least one EV space or EV charging station shall meet current van-accessible dimensions, as defined by the California Building Code, and be connected to a barrier-free accessible route of travel to the building. The EV space with van-accessible dimensions shall be the first EV charging station established on the property.

**Consistency:** The Project proposes to provide 8 electric vehicle-charging stations within its 41-space parking area. Of those, 2 will be EVSE spaces with supplying electricity, 1 for a van-accessible space, and 1 a standard accessible space. The Project will also provide a minimum of 6 additional EVCS spaces with EV-capable raceways and electrical panel capacity (for 8 total EV spaces), all of which will be located at the front of the existing Gym mid-way between the entrances to new Buildings 1 and 3. The Project will be consistent with all City and CalGreen requirements for electrical vehicle charging stations.

### Conclusions

A finding of Project consistency with applicable General Plan policies and SSF Zoning Code regulations as evaluated in a prior program EIR (i.e., the SSF 2040 General Plan Update EIR) is required for the Project to qualify for a CEQA exemption pursuant to CEQA Guidelines Section 15332.

As demonstrated above, the Project’s proposed improvements to the existing BGCP Orange Park Clubhouse are consistent with the intent of the General Plan’s Parks and Recreation land use designation, and that land use designation’s desired mix of land use types. The General Plan’s Park and Recreation land use does not provide for a maximum development intensity, or maximum FAR. The Project would increase the overall FAR of the approximately 3-acre site from an FAR of 0.19 to 0.30, and the Project will retain a relatively low FAR for the site, consistent with the General Plan as analyzed in the SSF 2040 General Plan Update EIR.

The land use type proposed by the Project (the daycare uses, and the existing recreation use in the gym that will remain) are permitted uses within the underlying PR zoning district. The Project is consistent with regulations and development standards of the PR zone but does require approval of a variance for reconstruction of Building 1 approximately within the same footprint as existing Building 1, but as a 2-story structure with a 5-foot setback, rather than 10-foot side setback. The Project, with approval of a variance for the rear setback, is consistent with applicable PR zoning standards that apply to the site.

As such, the Project qualifies as a Project that is consistent with a Community Plan, General Plan and/or zoning, as required pursuant to CEQA Guidelines Section 15332.

## IV - Qualifications for an Infill Development Exemption

<u>Would the Project:</u>	<u>Yes</u>	<u>No</u>	<u>Applicable GP EIR Measures / Regulatory Reqmts</u>	<u>Level of Significance</u>
a) Is the project is consistent with the applicable general plan designation and all applicable general plan policies, as well as with applicable zoning designation and regulations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-	-
b) Does the proposed development occur within city limits, on a project site of no more than five acres, substantially surrounded by urban uses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-	-
c) Does the project site have any value as habitat for endangered, rare or threatened species?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	-	LTS
d) Would Project approval result in any significant effects relating to transportation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	-	LTS
e) Would Project approval result in any significant effects relating to noise?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Construction Hours and Noise Limits (SSFMC Section 8.32.050) HVAC Mechanical Equipment Shielding (SSFMC Section 8.32.030)	LTS
f) Would Project approval result in any significant effects relating to air quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Basic Construction Mitigation Measures (GP EIR MM AIR-1a)	LTS
g) Would Project approval result in any significant effects relating to water quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	BMPs for New Development and Redevelopment (SSFMC Section 14.04.180) Stormwater Treatment Requirements (SSFMC Section 14.04.131) Site Design and Stormwater Treatment Requirements for Regulated Projects (SSFMC Section 14.04.133) Low Impact Development (LID) Requirements (SSFMC Section 14.04.134)	LTS
h) Can the site be adequately served by all utilities and public services?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	-	LTS

### **a): General Plan and Zoning Consistency**

Yes      No



Is the Project consistent with the applicable General Plan designation and all applicable General Plan policies, as well as with applicable zoning designation and regulations?

As demonstrated in the prior chapter of this CEQA Exemption document, the Project's proposed land use is consistent with the intent of the SSF General Plan's applicable Parks and Recreation land use designation, and that land use designation's desired mix of land use types. The General Plan's Park and Recreation land use does not provide for a maximum development intensity, or maximum FAR. The Project would increase the overall FAR of the approximately 3-acre site from an FAR of 0.19 to 0.30, and the Project will retain a relatively low FAR for the site, consistent with the General Plan as analyzed in the SSF 2040 General Plan Update EIR.



The land use type proposed by the Project is a permitted use within the underlying PR zoning district. The Project is consistent with regulations and development standards of the PR zone but does require approval of a variance for reconstruction of Building 1 within approximately the same footprint as existing Building 1, but as a 2-story structure with a 5-foot setback, where Building 1 currently has no setback. The Project, with approval of a variance, is consistent with applicable PR zoning standards that apply to the site.

As such, the Project is consistent with the applicable General Plan designation and all applicable General Plan policies, as well as with applicable zoning designation and regulations. The Project qualifies under criteria a) as an Infill Development pursuant to CEQA Guidelines Section 15332.

#### **b): Site Location Criteria**

Yes      No

- ☒ Does the proposed development occur within city limits, on a project site of no more than five acres, substantially surrounded by urban uses?

The Project site is located within the Orange Park subarea of the SSF Generally Plan and is fully within the city limits of the City of South San Francisco.

The Project site (the existing BGCP Orange Park Clubhouse and surrounding parking) occupies an approximately 3-acre site that includes an approximately 2.75-acre portion of APN 093-331-11, and the 0.25-acre APN 093-331-150. The BGCP leases the Project site from the City of South San Francisco, which owns the much longer APN 093-331-11 property and the 0.25-acre APN 093-331-150 property (both of which are portions of the former Southern Pacific Railroad right-of-way), as well as other properties comprising Orange Memorial Park.<sup>2</sup>

The Project site is surrounded by other urbanized uses including the Orange Memorial Park to the northeast, single-family residences to the northwest, a church and single-family residences to the southwest, and the Los Cerritos Elementary School to the southeast.

As demonstrated above, the Project would occur within city limits, on a project site of no more than five acres, and on a site that is substantially surrounded by urban uses. The Project qualifies under criteria b) as an Infill Development pursuant to CEQA Guidelines Section 15332.

#### **c): Habitat for Endangered, Rare or Threatened Species**

Yes      No

- ☒ Does the Project site have any value as habitat for endangered, rare or threatened species?

According to the South San Francisco General Plan EIR, the “majority of the City of South San Francisco and the surrounding region is highly urbanized and developed and contains little suitable habitat for special-status species aside from a few areas including Sign Hill Park, San Bruno Mountain State Park as well as the remaining pockets of saltmarsh habitat along San Francisco Bay.” The Project site is not proximate to Sign Hill Park, San Bruno Mountain State Park or saltmarsh habitat along San Francisco Bay. The Project site is not an identified “Protected Area”, it does not contain estuarine or marine aquatic resources, and it is not identified as containing

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<sup>2</sup> Per “Protect Tustin Ranch v. City of Tustin”, (2021) 70 Cal.App.5th 951, the Court confirmed that a “project site” may be limited to the proposed development area, not the size of the legal parcel

annual grassland, chaparral, oak woodland, coastal scrub, eucalyptus, riparian, wetland or lacustrine habitat types.<sup>3</sup> The Project site is not identified as an ecologically sensitive area and is not identified as a potential connectivity route for wildlife species, (although the nearby Orange Memorial Park is considered ecologically sensitive and a wildlife connectivity route as a large City park).

The Project site is currently developed with existing buildings and surface parking lots, and with an ornamental grass lawn on the West Orange Avenue frontage. As indicated above, the Project site is surrounded by other urbanized uses. The Project site is separated from the tree-lined Memorial Drive and Orange Memorial Park by a paved portion of Centennial Way Trail.

This urban location provides no value as habitat for endangered, rare or threatened plant or animal species, and the Project qualifies under criteria c) as an Infill Development pursuant to CEQA Guidelines Section 15332.

#### **d) Transportation**

**Yes**      **No**

■      Would approval of the Project result in any significant effects relating to transportation?

#### **VMT and Screening Thresholds**

Pursuant to its 2022 General Plan Update, the City of South San Francisco adopted new Transportation Analysis Guidelines to provide a clear and consistent technical approach for analyzing projects that could have transportation effects on the City's transportation system and services. Consistent with State CEQA Guidelines Section 15064.3, the City of South San Francisco's Transportation Analysis Guidelines include transportation-related thresholds of significance that replaced level-of-service metrics with vehicle miles traveled (VMT) thresholds.

Based on guidance from the State of California's Office of Planning and Research (OPR Technical Advisory, December 2018), the city's Transportation Analysis Guidelines provide that land use projects that meet at least one screening threshold as presented in those Guidelines are not required to prepare a detailed vehicle miles traveled (VMT) analysis and are presumed to have a less than significant impact related to VMT. Those screening thresholds include:

- *Small Projects*: Projects defined as generating 100 or fewer average daily vehicle trips, absent substantial evidence indicating that a project would generate a potentially significant level of VMT.
- *Locally Serving Public Facility*: Locally serving public facilities that encompasses government, civic, cultural, health and infrastructure uses and activity which contribute to and support community needs, including locally serving public facilities including police stations, fire stations, passive parks, branch libraries, community centers, public utilities and neighborhood public schools.

#### **Small Project**

The existing BGCP Orange Park Clubhouse currently serves 250 students from grades K-8. The Project would improve the K-8 Clubhouse facility but is not proposing to increase the number of K-8 grade enrollment/participation rate. The Project's increase in enrollment/participation is due to construction of the new Teen

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<sup>3</sup> Reference SSF General Plan EIR, Figure 3.3-1: Existing Habitat Types and Protected Areas, and Figure 3.3-2: Ecologically Sensitive Areas



Center, which is anticipated to accommodate up to 150 new high school students. These new high school students comprise the change or increase in trips associated with the Project.

To estimate the number of average daily vehicle trips attributed to the Project (the new high school students), several very conservative assumptions are presented below:

- Assuming all trips attributed to these 150 high school students are new trips generated by the Project (as opposed to pass-by trips, where these students stop at the BGCP facility on their way home from school), these 150 new high school students would generate 300 total daily trips (1 arriving and 1 departing trip per student).<sup>4</sup>
- Assuming all these daily trips are made by private vehicle (either student drivers or as drop-offs) with an average of 1.5 students per vehicle, this would lower the total number of trips generated by the Project to 200 daily trips.
- The BGCP would need to achieve an alternative mode split of 50% of the new high school students arriving and leaving via transit and/or walking to lower the total number of daily vehicle trips to fewer than 100, and to be considered a Small Project per the City's Transportation Analysis Guidelines.

As shown in **Figure 12**, the BGCP Project site is located less than one-half mile walking and bicycling distance from the central campus of South San Francisco High School via Centennial Way Trail, and less than three-quarters of a mile walking and bicycling distance from Baden High School via West Orange Avenue. Additionally, the BGCP site is located immediately adjacent to a bus stop at the corner of West Orange Avenue/C Street, along the SamTrans school-oriented Bus Route 37 serving South San Francisco High School and Baden High School, and also with an easy connection to the SamTrans school-oriented Bus Route 35 serving El Camino High School.

It is reasonable to assume that at least 50 percent of the new high school students that participate at the BGCP Project after school will choose to walk, bicycle, or take the bus to the Project site, such that the Project would be likely to generate 100 or fewer average daily vehicle trips and meet the Small Project threshold.

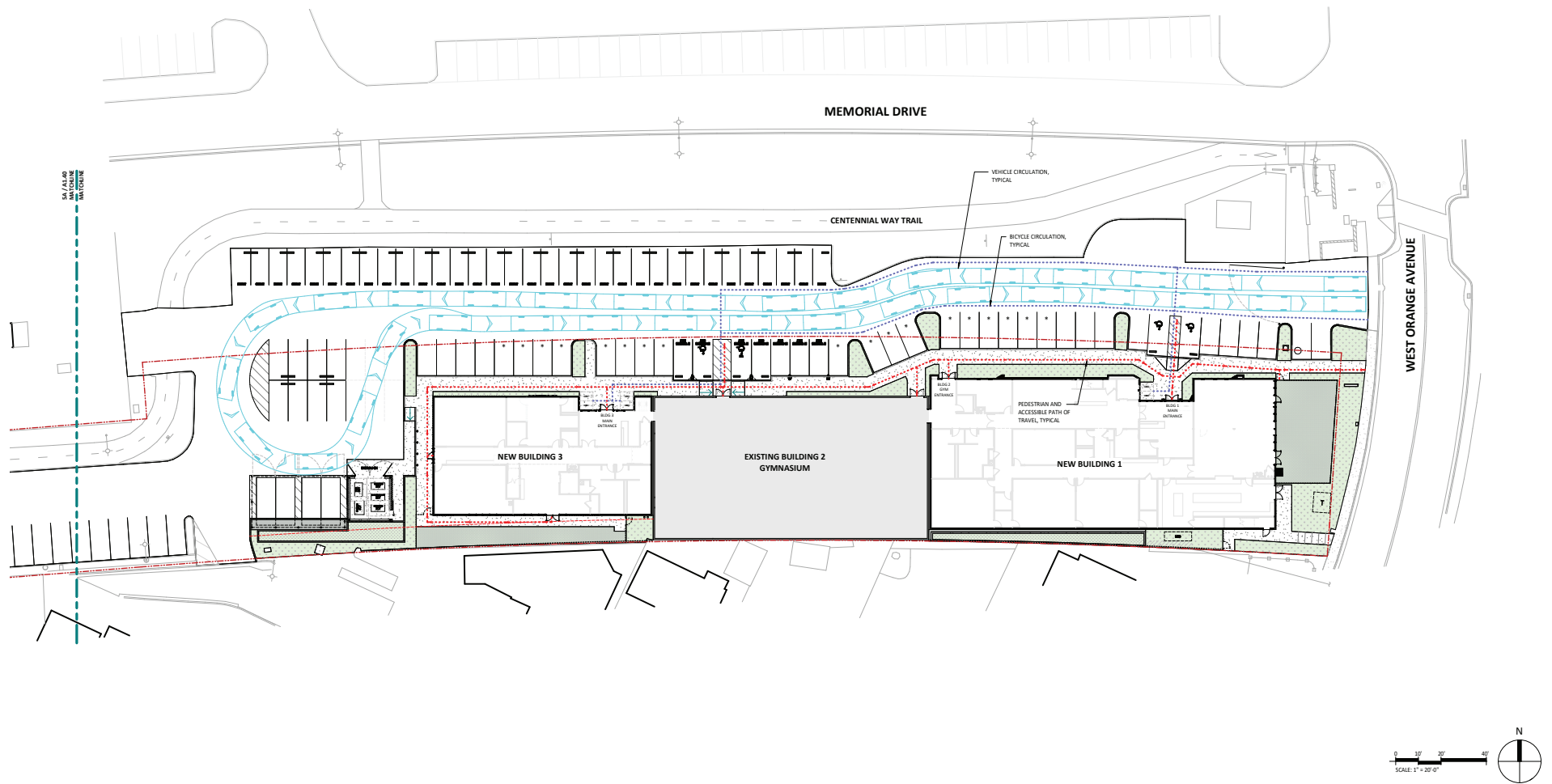
#### Locally Serving Public Facility

The Project, including the new high school student component, meets the definition of a local-serving civic use that supports community needs (e.g., a community center). As such, the Project meets the City's Transportation Analysis Guidelines that require projects to meet at least one screening threshold, and the Project is presumed to have a less than significant impact related to VMT.

The Project needs to only meet one screening threshold criteria to be considered a low VMT project. The Project clearly meets the local-serving civic use criteria and likely meets the Small Project threshold as well. Accordingly, the Project would not result in any significant effects relating to transportation (as measured by VMT thresholds), and the Project qualifies under criteria d) as an Infill Development pursuant to CEQA Guidelines Section 15332.

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<sup>4</sup> As a point of comparison, the ITE Trip Generation Manual, 11<sup>th</sup> Edition estimates that a day care center (Land Use Code 565) has a weekday PM peak period pass-by rate of 44%, meaning that 44% of the trips to/from a daycare center in the PM peak period are part of a separate work-to-home, school-to-home or other trip, and not individually attributed to the daycare center.



**Figure 12**  
**Site Circulation Plan**

Source: BGCP, DevCon, *Site Circulation Plan*, Sheet A1.40, 2/21/2025

### **e) Noise**

**Yes**      **No**

- Would approval of the Project result in any significant effects relating to noise?

#### **Construction-Period Noise**

Construction noise generated by the Project will vary based on the construction equipment used, the equipment location, and the timing and duration of the construction activities. The Project's site preparation phases will include demolition of two of the three existing structures on the site and will generate among the highest construction noise levels. The demolition process and excavation machinery such as bulldozers, backhoes and heavy trucks can typically generate noise levels of 80 to 85 dBA Lmax at distances of 50 feet (or approximately 85 to 91 dBA Lmax at 25 feet) from the operating equipment. Subsequent phases of construction (i.e., pouring of new foundations and framing of the new structures) would likely produce similar to slightly lower noise levels, typically in the range of 85 dBA at a distance of 25 feet from the center of the active construction work.

Land uses that surround the Project site include a church and single-family residences adjacent to the rear lot line of the Project site, and these uses are considered noise-sensitive uses. These nearest noise-sensitive land uses would be subject to temporary construction noise.

#### **Regulatory Requirements**

All construction activities within SSF, including the Project, are subject to the following regulatory requirements:

- ❖ ***Construction Hours and Noise Limits*** (SSF Municipal Code Section 8.32.050): Construction activities are limiting to the period between 8:00 a.m. and 8:00 p.m. on weekdays, between the hours of 9:00 a.m. and 8:00 p.m. on Saturdays, and between the hours of 10:00 a.m. and 6:00 p.m. on Sundays and holidays. An exception may be granted to these hours only if an application for construction-related exception is made to and considered by the City Manager or the City Manager's designee. Construction noise must also meet at least one of the following noise limitations:
  - a) No individual piece of equipment shall produce a noise level exceeding 90 dB at a distance of twenty-five feet. If the device is housed within a structure or trailer on the property, the measurement shall be made outside the structure at a distance as close to twenty-five feet from the equipment as possible.
  - b) The noise level at any point outside of the property plane of the project shall not exceed 90 dB.

Construction noise attributed to the Project would be temporary, and the Project applicant and/or construction contractors will be required to obtain all necessary permits and to abide by all construction hours as stipulated by existing regulations. As such, the Project would not expose persons to a substantial temporary increase in ambient noise levels in excess of standards established in the General Plan or SSFMC, and this impact would be less than significant.

#### **Permanent Operational Noise**

Typical operational noise sources attributed to the Project include the sounds of children/students engaged in outdoor activities at the Boys and Girls Club, traffic noise and parking lot noise attributed to vehicles dropping off and picking up children/students, and the new electrical and HVAC systems. These types of noise sources currently exist from the existing Boys and Girls Club but would incrementally increase commensurate with the addition of greater numbers of students and the larger buildings.

### *Outdoor Student Activity*

The current BGCP Orange Park Clubhouse is a hub of community activity, with programs that operate six days a week, serving up to its existing maximum capacity of 150 youth members daily. The current BGCP Orange Park Clubhouse is not a playground but rather provides educational programs and social engagement primarily within the interior of the Clubhouse, and recreational activities within the existing Gymnasium.

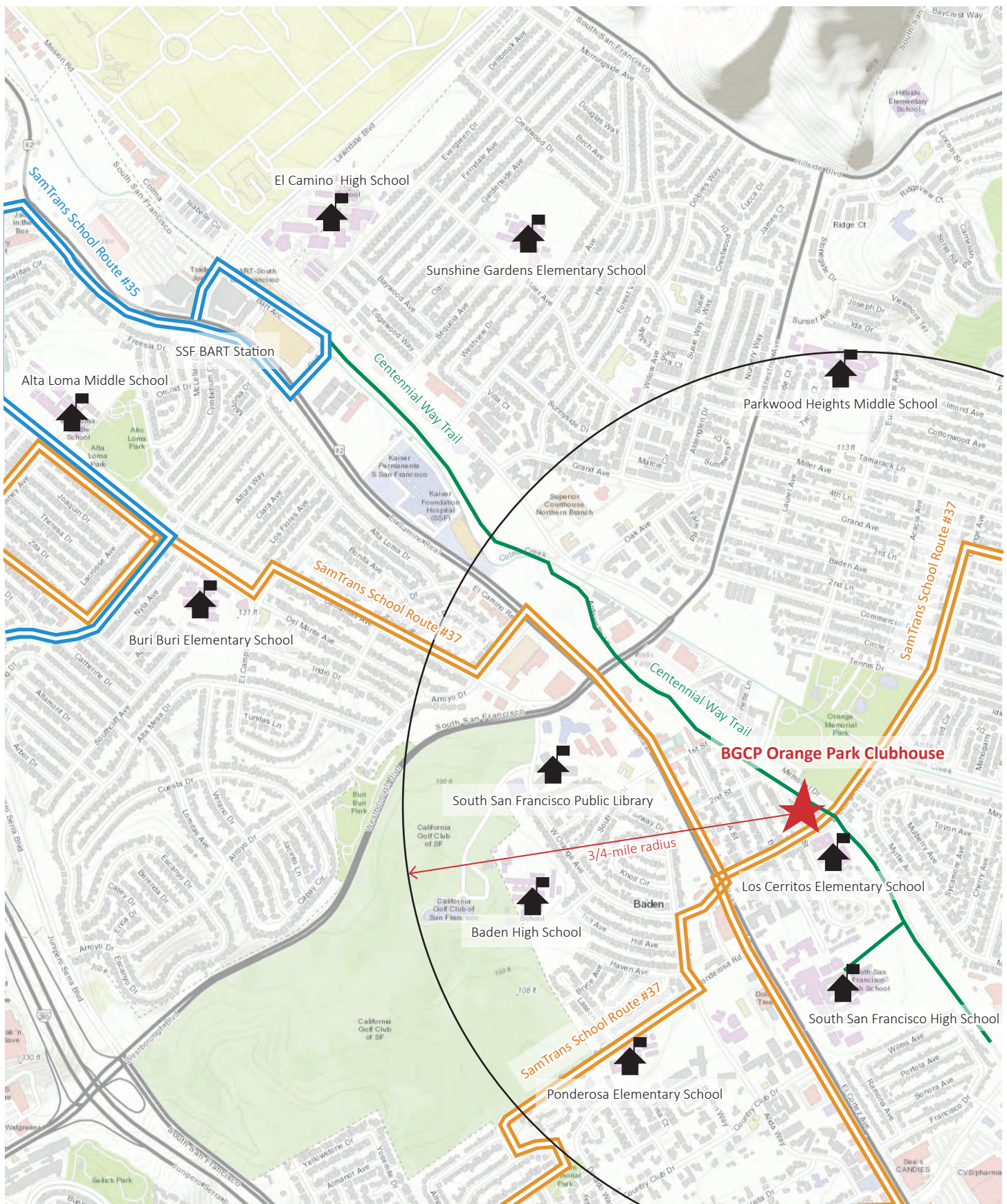
Potential changes in noise that are expected to be generated by long-term operation of the Project could occur from the addition of an outdoor cafeteria space near Orange Avenue, a small outdoor space with artificial turf at the rear of the proposed new Building 3 (nearest to adjacent residences) and an increase in the number of BGCP student members at the facility.

- The outdoor cafeteria space near Orange Avenue is separated from the nearest residential receptors by the new Building 1, which would effectively shield these sensitive receptors from outdoor student noise at this location, as well as a new 'Good-Neighbor' fence along the rear lot line of the Project site.
- The small outdoor space with artificial turf at the rear of the proposed new Building 3 is not intended as an active outdoor play area, but as a quieter outdoor seating and study area. This space will also be shielded from adjacent residences with the new 'Good-Neighbor' fence along the rear lot line of the Project site.
- Based on the properties of acoustics, a doubling (100 percent increase) in the number of BGCP student memberships would be required to generate a perceptible (i.e., a 3 dBA) increase in noise levels from general outdoor use. The Project would increase membership by approximately 75 percent (from 200 to 350 students), and would not generate a perceptible (i.e., a 3 dBA) increase in noise levels from general outdoor use.

### *On-Site Vehicular Traffic*

The Project would not make any substantial changes to on-site entrances or internal drive-aisles. The on-site vehicle circulation pattern will be clarified to provide for access from West Orange Avenue at the current driveway entrance, with a looped counterclockwise circulation pattern that flows back out the same access onto West Orange Avenue (see **Figure 13**). This on-site traffic loop occurs entirely on the northerly portion of the site, and the new Clubhouse buildings effectively shield traffic noise from the majority of the on-site traffic loop to the adjacent residents to the south. The anticipated increase in traffic volume due to increased BGCP student memberships and associated student drop-offs and pick-ups would not double in volume and would not result in a perceptible (i.e., more than 3 dBA) increase over existing on-site traffic noise levels. Thus, the noise levels generated by on-site vehicular traffic generated by the Project would have a less than significant impact to off-site receptors.





**Figure 13**  
**BGCP Orange Park Clubhouse, Proximity to Local Schools,**  
**Trails and School Bus Routes**

### *Off-Site Traffic Noise*

The City of South San Francisco threshold for permanent traffic-related noise establishes that a significant impact would occur if a proposed project would cause the CNEL to increase by 5 dBA or more if the CNEL would remain below normally acceptable levels for a receiving land use; an increase of 3 dBA or more and causing the CNEL in the vicinity of the proposed project to exceed normally acceptable levels; or to increase 1.5 dBA or more where the CNEL currently exceeds conditionally acceptable levels.<sup>5</sup>

Due to the logarithmic nature of additive noise sources, an accepted acoustic “rule of thumb” is that a doubling of traffic volume results in an increased noise level of approximately 3 dBA. As demonstrated above (under the topic of Transportation), the Project could generate between 100 to 300 daily trips, representing 1 arriving and 1 departing trip per new student, and the variations based on the number of assumed students per vehicle and assumptions about mode split. Even at the maximum of 300 daily trips, an increase of 300 vehicles per day would not double traffic volume on West Orange Avenue and would not result in an increased noise level of 3 dBA. Accordingly, the Project would not result in a significant increase in traffic noise in the vicinity of the Project site.

### *New HVAC Systems*

Noise levels from commercially available mechanical ventilation equipment range from 50 dBA to 60 dBA Leq at a distance of 25 feet. The Project’s operational noise from proposed new stationary sources could potentially exceed the City’s thresholds at the adjacent sensitive receptor land uses. Operational noise from mechanical equipment can be mitigated either at the source or at the receiving land use by using setbacks, shielding, acoustic-rated windows, or by locating such equipment on rooftops or sides of buildings opposite sensitive receptors.

### Regulatory Requirements

All new buildings within SSF, including the Project, are subject to the following regulatory requirement:

- ❖ ***HVAC Mechanical Equipment Shielding*** (SSFMC Noise Ordinance, Section 8.32.030): Prior to approval of building permits the applicant shall submit a design plan for the project demonstrating that noise levels from operation of mechanical equipment will not exceed the exterior noise level limits for a designated receiving land use category. Noise control measures may include but are not limited to the selection of quiet equipment, equipment setbacks, silencers, and/or acoustical barriers.

With implementation of these standards, noise impacts from the Project’s stationary operational equipment would result in a less than significant impact.

Approval of the Project would not result in any significant effects relating to noise, and the Project qualifies under criteria e) as an Infill Development pursuant to CEQA Guidelines Section 15332.

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<sup>5</sup> City of South San Francisco, *General Plan Update, Zoning Code Amendments, and Climate Action Plan Draft Program EIR*, 2022, page 3-11-27

**f) Air Quality****Yes      No**

- Would approval of the Project result in any significant effects relating to air quality?

**Construction-Period Air Quality Emissions**

The Bay Area Air Quality Management District (BAAQMD) has developed screening thresholds for projects of smaller size that are unlikely to result in generation of construction-related criteria air pollutants or precursor emissions that exceed thresholds of significance.<sup>6</sup> The BAAQMD's screening methodology does not include a land use category that is a direct match for the unique Boys and Girls Club Project, but does include construction-period screening levels for a civic center, a day care, and for schools (elementary through high school). The construction-period screening level for reach of these types of uses is 425,000 square feet. With a total construction of 29,340 square feet of new space within Buildings 1 and 3, the Project is well below the construction-period screening thresholds, and the Project's construction-period emissions of criteria air pollutants can be presumed to be less than significant.

However, the BAAQMD's 2022 CEQA Guidelines indicate that construction-period screening thresholds should not be used if construction-related activities include demolition. Whereas the Project does include demolition, the Project's construction emissions have been modeled using the latest version of the California Emissions Estimator Model (CalEEMod, Version 2022.1.0.14), to verify the less than significant presumption. Project-specific construction details were entered into the CalEEMod emissions calculator, including the following:

- site acreage of approximately 3 acres, but site disturbance of less than 1 acre attributed to the Project
- demolition of the 9,500 square-foot existing Building 1, and demolition of the 2,400 square-foot existing Building 3
- excavation of approximately 1,060 cubic yards of soil from beneath future Buildings 1 and 3, and import of a similar volume of either lightweight cellular concrete or geofoam, as necessary to offset the weight of the new buildings within the BART tunnel's Zone of Influence (see further discussion under potential Exceptions, Unusual Circumstances)
- grading associated with the new building footprints, new landscape areas and site flatwork (walkways and other concrete), for total of approximately 18,500 square feet (approximately 1/2 acre), with minimal soil export required
- 29,340 square feet of new building construction (new Buildings 1 and 3)
- A limited amount of new/replaced on-site pavement (assume 1,500 square feet), and
- approximately 6,500 square feet of new/replaced landscape
- The CalEEMod emissions calculator generated an assumed construction schedule of approximately 8 months, with an estimated start date of 6/3/2025

Model defaults were otherwise used. The CalEEMod emissions calculator results for construction-period emissions are included in **Appendix A**, and emissions from construction are summarized in **Table 3**.

<sup>6</sup> Bay Area Air Quality Management District (BAAQMD), *2022 CEQA Guidelines*, Chapter 3



**Table 3: Regional Criteria Air Pollutant Emissions during Construction**

	<u>Reactive Organic Gases</u>	<u>Nitrogen Oxides</u>	<u>PM10, Exhaust</u>	<u>PM2.5, Exhaust</u>
Annual (tons/year) <sup>1</sup>	0.22	0.65	0.03	0.02
Threshold	10	10	15	10
Exceed Threshold?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>
Average Daily (pounds/day) <sup>2</sup>	1.78	5.24	0.20	0.19
Average Daily Threshold	54	54	82	54
Exceed Threshold?	<b>No</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: CalEEMod results per **Appendix A**

Notes: 1. CalEEMod reports annual emissions during each calendar year (2025 and 2026). For purposes of this analysis, the annual emissions are presented as total emissions over a 1-year duration (or a 365-day period), which spans across 2025 and 2026  
2. Per BAAQMD CEQA Guidelines, average daily construction emissions are calculated based on annual emissions divided by the number of working days per year. Based on the CalEEMod emissions calculator, a 246-day construction period is assumed.

As shown, the Project's construction-period emissions of criteria pollutants would be well below threshold levels and this impact would be less than significant.

#### Applicable General Plan EIR Mitigation Measures

The SSF 2040 General Plan EIR identified implementation of construction mitigation measures to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds. These basic measures are included in the SSF General Plan EIR Mitigation Measure AIR-1a, and would apply to the Project:

- ❖ **Basic Construction Mitigation Measures** (GP EIR MM AIR-1a): The Project shall incorporate the following Basic Construction Mitigation Measures recommended by the Bay Area Air Quality Management District (BAAQMD):
  - a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
  - b. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
  - c. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
  - d. All vehicle speeds on unpaved roads shall be limited to 15 mph.
  - e. All roadways, driveways and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
  - f. Idling times shall be minimized either by shutting equipment off when not in use, or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure [ATCM] Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
  - g. All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.



- h. Prior to the commencement of construction activities, individual project proponents shall post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number shall also be visible to ensure compliance with applicable regulations.

Consistent with the air quality impact analysis of the SSF 2040 General Plan EIR, the Project would be required to implement the BAAQMD's recommended Basic Construction Mitigation Measures for control of construction-related criteria pollutant emissions, per GP EIR MM AIR-1a. These measures would further reduce the Project's less than significant construction-related emissions.

### **Operational Criteria Pollutants**

The Bay Area Air Quality Management District's 2022 CEQA Guidelines also includes screening thresholds for projects of smaller size that are unlikely to result in generation of operational-period criteria air pollutants or precursor emissions that might otherwise exceed thresholds of significance. The BAAQMD's screening methodology does not include a land use category that is a direct match for the unique Boys and Girls Club Project, but does include operational screening levels for a civic center (314,000 square feet), a day care center (232,000 square feet), an elementary school (488,000 square feet), a junior high school (475,000 square feet) and a high school (579,000 square feet). With a total construction of 29,340 square feet of new space within Buildings 1 and 3, the Project is well below the operational screening thresholds for these comparable land use categories. The Project's operational emissions of criteria air pollutants can be presumed to be less than significant. This conclusion is also well-supported by the transportation analysis (above), which demonstrates that the Project would be a local-serving land use that would not generate significant vehicle miles traveled and therefore would not generate significant vehicle emissions of criteria pollutants.

As demonstrated in the analyses below, and with implementation of all required City of Oakland SCAs, approval of the Project would not result in any significant effects relating to air quality. The Project qualifies under criteria f) as an Infill Development pursuant to CEQA Guidelines Section 15332.

### **g) Water Quality**

**Yes**      **No**

- Would approval of the Project result in any significant effects relating to water quality?

As demonstrated in the analyses below, approval of the Project would not result in any significant effects relating to water quality, and the Project qualifies under criteria g) as an Infill Development pursuant to CEQA Guidelines Section 15332.

The Project site is located in an urbanized portion of the city. The closest body of surface water to the Project site is Colma Creek, located to the northeast at a distance of approximately 750 feet. The surface grades at the Project site slope gently down from the north to the south away from Colma Creek, and the Project will have no direct effects on surface water or surface water quality.

However, runoff from the Project site is collected within the city stormdrain system, which does eventually drain to the Bay. Construction-period runoff and operational stormwater runoff could have indirect effects on downstream surface waters, as discussed below.

### **Construction-Period Effects on Water Quality**

Construction associated with the Project would involve ground-disturbing activities that may increase the potential for erosion and sedimentation. Construction equipment could contribute pollutants to stormwater runoff in the form of sediment and other pollutants such as fuels, oil, lubricants, hydraulic fluid or other contaminants. If mobilized during construction, sediment and silt could also be transported to downstream receiving waters, and degradation of water quality could occur.

The National Pollutant Discharge Elimination System (NPDES) is implemented by the State Water Board to ensure that conditions present at a “regulated” construction site do not cause or contribute to direct or indirect impacts on water quality. Pursuant to NPDES c.6 provisions, Regulated Projects (i.e., projects that disturb one acre or more of soil during construction) are required to comply with the requirements of a Construction General Permit by filing a Notice of Intent to obtain coverage under that permit, by preparing and implementing a Storm Water Pollution Prevention Plan, and by implementing inspection, monitoring and reporting requirements.

Although the Project site is approximately three acres in size, the Project would disturb less than one acre of soil during construction (approximately 16,200 square feet of land underlying new Buildings 1 and 3, a limited amount of pavement work surrounding the edges of the building, about 1,100 square feet of outdoor turf area, and exterior landscape areas). The Project is therefore not a Regulated project and is not subject to the requirements of a Construction General Permit.

#### **Applicable Regulatory Requirements**

The Project is subject to the following requirements of the SSF Municipal Code that apply to all construction sites:

❖ ***BMPs for New Developments and Redevelopments*** (SSFMC Section 14.04.180 9[d]): All construction sites in the city shall implement year round effective erosion control, run-on and runoff control, sediment control, active treatment systems (as appropriate), good site management, and non-stormwater management through all phases of construction (including, but not limited to site grading, building and finishing of lots) until the site is stabilized by landscaping or the installation of permanent erosion control measures. The following items must be included in the Project’s construction and building permit plans as they are requirements of the Water Quality Control Stormwater and/or Pretreatment Program, and must be completed prior to the issuance of a building permit:

- a. Storm drains must be protected during construction. Discharge of any demolition/construction debris or water to the storm drain system is prohibited.
- b. Do not use gravel bags for erosion control in the street or drive aisles. Drains in street must have inlet and throat protection of a material that is not susceptible to breakage from vehicular traffic.

Consistent with applicable City regulations, the Project will be required to prepare an Erosion and Sediment Control Plan for the site that includes all required BMPS to address construction-period water quality protection. The Erosion and Sediment Control Plan will be subject to review and approval by the City prior to issuance of any grading permits, and the Project applicant is required to implement the approved Plan. With required implementation of Best Management Practices (BMPs) for erosion control, pollutants and sediment generated during construction will be managed to prevent or reduce indirect effects on downstream receiving waters, and construction-period effects on water quality will be less than significant.

### **Operational Effects on Water Quality**

During the life of the Project, new student members, employees and vehicles may generate non-point source pollutants potentially including oil, grease and toxic chemicals from parking and driveway runoff, and litter.

These non-point source pollutants can be washed from impervious surfaces such as roofs and parking areas into the downstream drainage network, and directly into the Bay and other surface waters. Non-point source pollutants can have adverse effects on water quality and can also infiltrate into groundwater and degrade the quality of groundwater resources.

Currently, about 96% of the Project site is covered by impervious surfaces (rooftops, pavement and sidewalk) and only about 4% (or 5,200 square feet) is covered by pervious grass along the West Orange frontage. The Project will increase on-site landscaping (pervious area), such that about 5% of the site will be pervious surfaces. The Project's minor reduction of impervious surfaces will result in a minor reduction of non-point source pollutants, and a minor reduction in stormwater runoff and contaminants washed by rainwater into downstream receiving waters, but the large majority of the site will remain covered by impervious surfaces.

The National Pollutant Discharge Elimination System's C.3 provisions apply to Regulated Projects, defined as projects that create or replace 10,000 square feet or more of impervious area, or 5,000 square feet or more of new or existing impervious surface area within uncovered surface parking lots.

#### Applicable Regulatory Requirements

The Project will have well over 10,000 square feet of new or replaced impervious surface (including new buildings and re-paved areas) and is therefore considered a Regulated Project. The following regulations apply to all projects considered Regulated Projects under the NPDES C.3 requirements.

- ❖ ***Stormwater Treatment Requirements*** (SSFMC Section 14.04.131): Stormwater treatment requirements as specified in NPDES Permit are mandated for certain categories of new and redevelopment projects based upon the amount of impervious area created, added or replaced by a project. Stormwater treatment BMPs for Regulated projects shall incorporate hydraulic sizing design criteria as specified in NPDES Permit to treat stormwater runoff.
- ❖ ***Site Design and Stormwater Treatment Requirements for Regulated Projects*** (SSFMC Section 14.04.133): The Director of Public Works or designee shall require each Regulated Project to implement at least the following design strategies on-site:
  - a. Limit disturbance of natural water bodies and drainage systems; minimize compaction of highly permeable soils; protect slopes and channels; and minimize impacts from stormwater and urban runoff on the biological integrity of natural drainage systems and water bodies;
  - b. Conserve natural areas, including existing trees, other vegetation, and soils;
  - c. Minimize impervious surfaces, minimize disturbances to natural drainages, and minimize stormwater runoff by implementing one or more of the following site design measures:
    - Direct roof runoff into cisterns or rain barrels for reuse
    - Direct roof runoff, runoff from sidewalks, walkways and/or patios, and runoff from driveways and/or uncovered parking lots onto vegetated areas
    - Construct sidewalks, walkways, driveways, bike lanes, and/or uncovered parking lots with permeable surfaces
- ❖ ***Low Impact Development (LID) Requirements*** (SSFMC Section 14.04.134): The purpose of LID is to reduce runoff and mimic a site's predevelopment hydrology by implementing specific practices to control potential sources of pollution and site design strategies to treat stormwater. All regulated projects shall implement LID requirements as specified in the NPDES Permit.

### Project Plans Pursuant to Regulations

Consistent with applicable City regulations and NPDES requirements, the Project includes a Preliminary Stormwater Management Plan for the site (see **Figure 14**). This Preliminary Stormwater Management Plan demonstrates that the Project will minimize impacts to stormwater runoff by directing runoff from new and replaced impervious surfaces into vegetated areas (flow-through planters with bubbler-boxes) prior to discharge into the City's stormdrain system.

The Preliminary Stormwater Management Plan will be subject to review and approval by the City prior to issuance of any grading permits, and the Project applicant is required to implement the approved Stormwater Management Plan. The Project's effects related to non-point source water pollution will be fully addressed through implementation of existing regulations, and this impact would be less than significant.

Approval of the Project would not result in any significant effects relating to water quality, and the Project qualifies under criteria g) as an Infill Development pursuant to CEQA Guidelines Section 15332.

### h): Utilities and Public Services

Yes      No

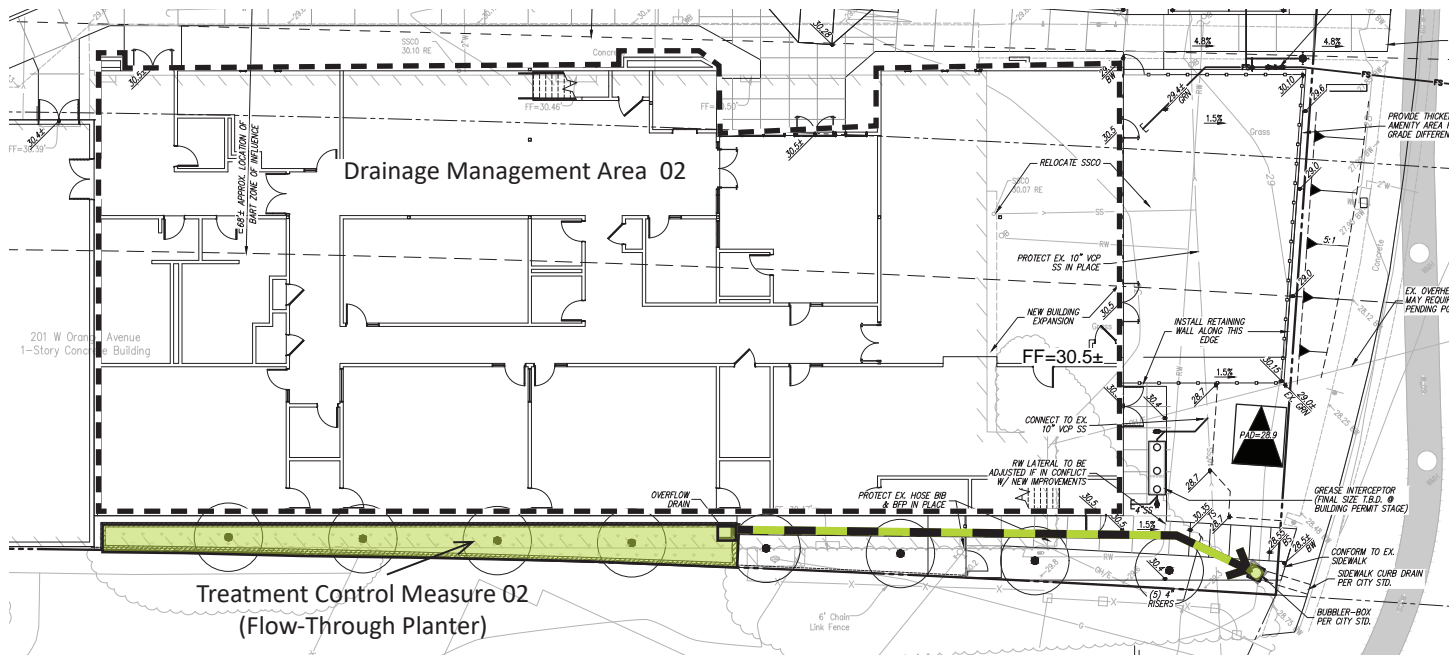


Can the Project site be adequately served by all utilities and public services?

The Project site can be adequately served by all utilities and public services, and the Project qualifies under criteria h) as an Infill Development pursuant to CEQA Guidelines Section 15332.

The Project is located adjacent to the existing Clubhouse building, which is already served by existing utilities. The Project will connect its new domestic water and sanitary sewer lines to existing water and sanitary sewer lines at the Clubhouse. The Project will also connect a short segment of new stormdrain to an existing stormdrain that routes stormwater runoff towards the Project's proposed new bioretention basin prior to discharge into an existing 12-inch stormdrain that connects to the City's downstream stormdrain system.

The Project proposes to construct its new buildings at a location that is already provided with all necessary utility services and does not require or propose any new utility services for its operations.



**Figure 14**  
**Preliminary Stormwater Management Plan**

Source: BGCP, DevCon, *Preliminary SWCP*, Sheets C3.1, C3.2 and C4.1, 2/21/2025

## V - Potential Exceptions to a CEQA Exemption

Pursuant to CEQA Guidelines Section 15300.2, a CEQA exemption would not apply to the Project if the Project would trigger any of the exceptions to categorical exemptions based on site-specific environmental criteria. According to these CEQA Guidelines, a categorical exemption shall not be used for a project under the following circumstances:

<u>Exception Criteria:</u>	<u>Yes</u>	<u>No</u>	<u>Applicable GP EIR Measures / Regulatory Reqmts</u>	<u>Level of Significance</u>
a) Is the Project a Classes 3, 4, 5, 6 or 11 exemption that may be qualified by consideration of where the project is to be located – i.e., in a particularly sensitive environment such that it may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	-	Not applicable
b) Would the cumulative impact of successive projects of the same type in the same place, over time be significant?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	-	LTS
c) Is there a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	BART Facilities Standard Design Criteria for Structural, Design and Construction near Existing BART Structures	LTS
d) Might the project 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	-	LTS
e) Is the project located on a hazardous waste site that is included on any list compiled pursuant to Section 65962.5 of the Government Code?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Bay Area Air Quality Management District's Regulation 11, Rule 2 re: asbestos	LTS
f) Would the project cause a substantial adverse change in the significance of a historical resource?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	-	LTS

### a): Location

Per CEQA Guidelines Section 15300.2(a), classes 3, 4, 5, 6, and 11 CEQA exemptions are qualified by consideration of where the project is to be located--a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.



The Project is not considered as, or reviewed as a potential Class 3, 4, 5, 6 or 11 CEQA exemption and this exception does not apply. The Project site is in a typical urban location that is not of particular environmental sensitivity, and the Project will not impact on an environmental resource of hazardous or critical concern that is designated, precisely mapped or officially adopted pursuant to law by federal, state or local agencies. Accordingly, the exception under CEQA Guidelines Section 15300.2(a) does not apply to the Project.

### **b): Cumulative Impact of Successive, Similar Projects**

Per CEQA Guidelines Section 15300.2(b), all CEQA categorical exemptions are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

#### **GHG Emissions**

The BAAQMD has identified the necessary design elements required for new land use projects to achieve California's long-term climate goal of carbon neutrality by 2045. If these design elements are incorporated into the design and construction of a project, then the project would contribute its portion of what is necessary to achieve California's long-term climate goals - its "fair share", and a lead agency reviewing the project under CEQA can conclude that the project would not make a cumulatively considerable contribution to global climate change. The thresholds of significance for development projects (i.e., the Project) must either be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines (i.e., the SSF Climate Action Plan), or must meet the following project design elements of the BAAQMD CEQA Guidelines:

- *Projects must include, at a minimum, the following project design elements:*
  - *The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).*

**Consistency:** The Project's energy demands will be served entirely by electricity, and no natural gas appliances or plumbing is proposed.

- *The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b) (3) and Section 15126.2(b) of the State CEQA Guidelines.*

**Consistency:** The Project's design is required to and fully intends to meet all applicable standards and requirements of the 2022 California Energy Code and the 2022 Green Building Standards Code (CalGreen), widely considered to be America's first sustainability-focused standard for greener, cleaner construction).

- *The project will achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent), or meet a locally adopted Senate Bill 743 VMT target that reflects those recommendations provided in the Governor's Office of Planning and Research's Technical Advisory.*

**Consistency:** As demonstrated in the Transportation section of this document, the Project is a local-serving community space that will not generate significant VMT and will not contribute a cumulatively significant contribution of transportation-related GHG emissions.

- *The project will achieve compliance with off-street electric vehicle (EV) requirements in the most recently adopted version of CALGreen Tier 2*

**Consistency:** Pursuant to the requirements of South San Francisco Municipal Code Table 20.330.008 and 2022 CALGreen (July 2024 Supplement) Table 20.300.008, the Project has committed to provide 8 EV-capable (EVC) parking stalls, including 2 EVSE charging spaces (with supplying electricity) which will serve 1 standard parking space and one ADA-accessible van parking space.

Based on the above, the Project satisfies the design requirements necessary to demonstrate that it will contribute its “fair share” towards California’s long-term climate goals, and the Project will not make a cumulatively considerable contribution to global climate change.

### **Other Cumulative Effects**

As indicated elsewhere in this document, the Project is consistent with the SSF 2040 General Plan Update and with all applicable zoning regulations. Consistent with CEQA Guidelines Section 15183, this CEQA document needs not re-consider cumulative effects already addressed under the SSF 2040 GP. As fully analyzed in this document, the Project’s impacts under the topics of historic resources, transportation, water quality, noise and air quality are assessed in relation to the combined cumulative effects of other approved, pending and reasonably foreseeable future projects of generally the same type, and in the same general vicinity as the Project. These effects of the Project have been found to be less than significant and would not make a considerable contribution to any cumulative effects.

The Project is individually unique and there are no successive projects of the same type in the same place. The Project is consistent with the development intensity as assumed in the General Plan EIR, and the Project’s potential contribution to cumulatively significant effects has already been addressed in that EIR. There are no further cumulative effects associated with the Project and an exception under CEQA Guidelines Section 15300.2(a) does not apply to the Project.

### **c): Unusual Circumstances**

Per CEQA Guidelines Section 15300.2(c), a categorical exemption shall not 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.

The activities associated with the existing, and an expanded use of the site for a Boys and Girls Clubs of America facility is not unusual. The site has been used for this same activity since 1961, when the original building was dedicated. The surface of the BGCP site has no unusual characteristics. The current buildings on the site are associated with the Boys Club of America since 1961, and with the Boys and Girls Clubs of America since it was merged in 1990. The surrounding property is a typical parking area, also associated with the adjacent Orange Memorial Park.

### **Underground BART**

When first constructed, the SSF Boys’ Club stood alongside the Southern Pacific Railway right-of-way and rail tracks. In the late 1990s, that surface rail track was replaced by the underground BART extension to the SF International Airport, which opened in 2003. The presence of the underground BART line is an unusual circumstance that might present a significant effect on how the proposed Project is constructed.

The following information pertaining to the presence of the BART tracks and the implications for the Project are derived from the following source:

- Langan Engineers, *Geotechnical Investigation of the BGCP Site*, March 21, 2025 (see **Appendix B**)

The San Francisco Bay Area Rapid Transit (BART) District maintains a subsurface easement in the northeast part of the Project site and the underground BART tunnels and ventilation structures are within this easement. The BART tunnel alignment is oriented along Memorial Drive in the vicinity and runs roughly northwest-southeast. The approximate location of the BART tunnel alignment, interpreted from the BART as-built drawings, is shown

on **Figure 15**.<sup>7</sup> The bottom of the ventilation structure and tunnel structure adjacent to the site are about 35 feet beneath existing site grades. Design and construction of the Project needs to address BART Facilities Standards Design Criteria for Structural, Design and Construction near Existing BART Structures and Geo-Structures. All criteria should be considered in the design and construction processes, including those criteria as summarized below:

- New structures must be designed and constructed so as not to impose any temporary or permanent adverse effects on existing BART structure, including temporary or permanent changes to loading on the BART structure
- A minimum clearance needs to be maintained between the BART structure and the exterior face of new substructures
- If shoring is required for any significant excavations in the ZOI, shoring design shall maintain at-rest soil conditions and be monitored for movement
- A vibration monitoring plan shall be prepared to document the potential for induced vibration and noise from construction equipment, with procedures to ensure that they do not affect BART facilities and operations
- Minimum soil cover over underground structures shall be maintained

The BART tunnel location and the location where the temporary ZOI intersects the exterior ground surface at the Project site are shown on **Figure 15**.

Because portions of the proposed new buildings for the Project are either within or very close to the ZOI, the following regulatory requirements are required of the Project:

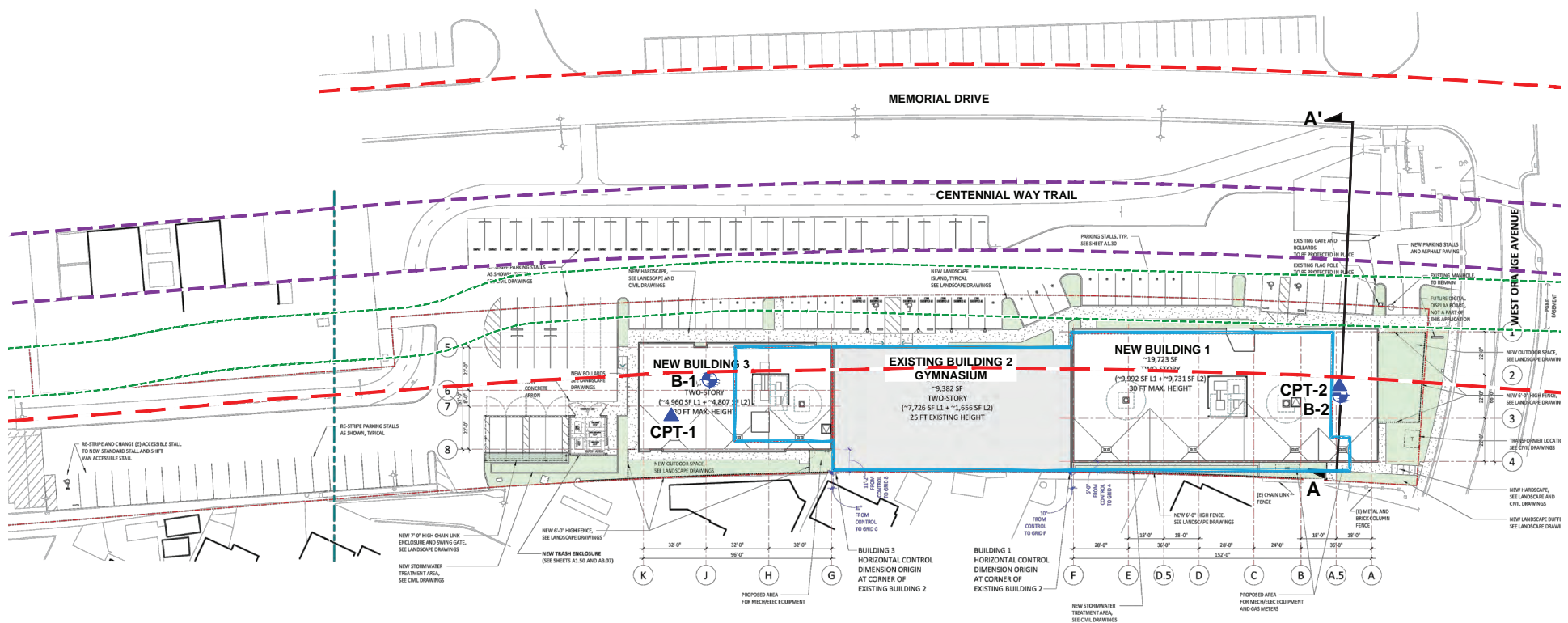
❖ **BART Facilities Standards Design Criteria:** BART Guidelines will have to be considered during the design and construction of the foundation system for the proposed buildings. Since their construction, the BART tunnels have been subjected to the dead plus live loading from the existing Boys and Girls Club buildings and operations. The Project's new buildings will be located at roughly the same footprint as the existing structures, but the Project's two-story structure for Building 1 will extend southeast slightly further than the existing building footprint and will also likely be heavier than the existing one-story building. Building 3 will also extend northwest beyond the footprint of the existing structure. To mitigate any potential for additional loading on the BART ZOI, the following design considerations for the Project are recommended:<sup>8</sup>

- The weight of the Project's new buildings should be offset within the BART's ZOI, such that the weight resulting from the future structures are no more than the weight that is currently present. This balance can be achieved by over-excavating beneath the planned building footprints within the BART ZOI and placing lightweight material, which may consist of lightweight cellular concrete (LCC) or geof foam (Insulfoam).
- Where shallow foundations are located within the BART ZOI, they will need to be constructed so that they do not transfer lateral loads from the new building to the soil within the ZOI.

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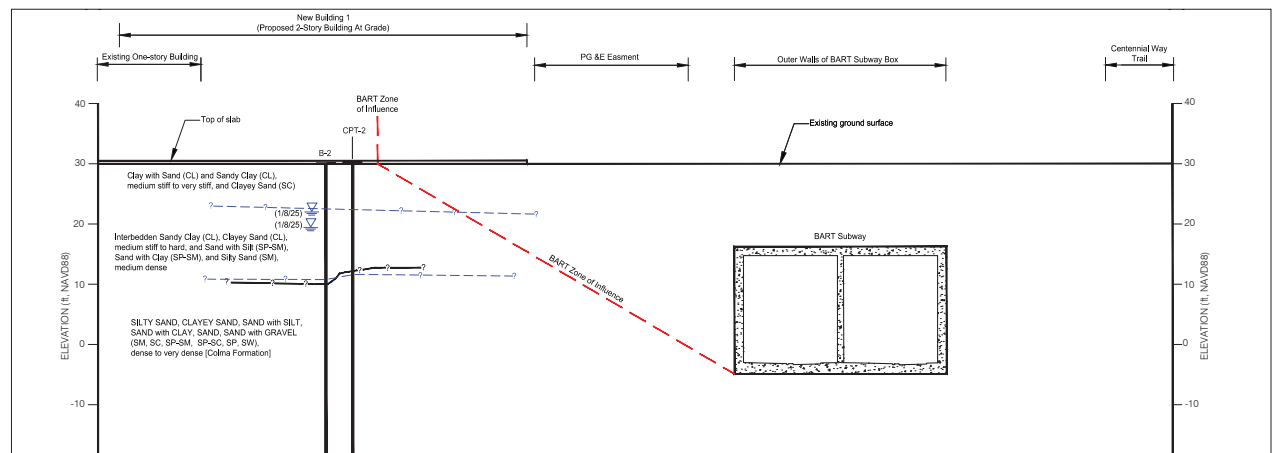
<sup>7</sup> BART, *San Francisco Airport Extension, Line, Trackwork and Systems Plan and Profile W2 357+00 to W2 369+00*", dated 05 March 2004

<sup>8</sup> Langan Engineers, *Geotechnical Investigation of the BGCP Site*, March 21, 2025



## EXPLANATION

- B-1** Approximate location of boring by Langan, January 2025
- CPT-1** Approximate location of cone penetration test by Langan, January 2025
- Approximate limits of Existing One-Story Building
- Approximate limits of outer walls of BART subway box where in proximity of 201 West Orange Avenue
- Approximate limit of BART Zone of Influence at existing ground surface
- Approximate PG&E easement boundary



**Figure 15**  
**BART Tunnel and Zone of Influence**

Source: Langan, *Geotechnical Investigation*, Figure 2, 3/14/2025

BART Engineering will need to review and accept the final geotechnical report and the structural plans and calculations for the Project, with evidence of BART Approval prior to issuance of building permits.

With implementation of BART's required design measure for the portion of the new buildings within the BART Zone of Influence, the Project will not have a significant effect on the environment due to the unusual circumstances associated with the nearby presence of the underground BART tracks. Therefore, an exception under CEQA Guidelines Section 15300.2(c) does not apply to the Project.

**d): Damage to Scenic Resources**

Per CEQA Guidelines Section 15300.2(d), a categorical exemption shall not 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.

Interstate 280 (I-280) is an officially designated State Scenic Highway from the South San Francisco and San Bruno border, south to Stanford University in Palo Alto. This portion of I-280 does not traverse through South San Francisco. While distant views of the City of South San Francisco and San Bruno Mountain are intermittently visible from this portion of I-280, most views of the City and San Bruno Mountain are shielded by existing trees. The Project site is approximately 1.25 miles from the nearest portion of this Scenic Highway, and the Project would not be visible from this portion of the Scenic Highway.

I-280 from Mission Bay Drive to the South San Francisco/San Bruno border is eligible for designation but is not a designated State Scenic Highway. Views from this portion of I-280 include trees, local roadways and houses in the foreground, and views of South San Francisco, San Bruno Mountain and the San Francisco Bay in the distance. The Project site is just over 1 mile from the nearest portion of this eligible Scenic Highway, and the Project, even at its increased 2-story height, would not be distinctly visible from this portion of I-280.

The portion of State Route 35 (Junipero Serra Freeway) that borders the western side of South San Francisco is also eligible for designation as a State Scenic Highway. Distant views of the City of South San Francisco and San Bruno Mountain are intermittently visible from SR-35, but the Project (at more than 2 miles distant from the nearest portion) would not be visible from this highway.

The Project does not result in any significant change or damage to scenic resources as seen from the surrounding area, and the exception under CEQA Guidelines Section 15300.2(d) does not apply to the Project.

**e): Section 65962.5 of the Government Code (i.e., Cortese List)**

Per CEQA Guidelines Section 15300.2(e), a categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

The following information pertaining to the presence of hazardous materials and the implication for the Project is derived from the following source:

- AST Inc. Geotechnical, Phase I ESA for the Boys & Girls Clubs of the Peninsula, February 2025 (**Appendix C**)

**Section 65962.5 of the Government Code**

Hazardous materials sites compiled pursuant to Government Code Section 65962.5 are known as the Cortese list. This list is comprised of identified sites with suspected and/or confirmed releases of hazardous materials to the sub-surface soil and/or groundwater that may create a significant hazard to the public or the environment.

- Based on AST's review of the Department of Toxic Substance Control (DTSC) ENVIROSTOR database, there are no records in the database for the subject property. The review of this database did not reveal

any documents or records, or any environmental concerns at the Project site. The Project site is not on the list of Hazardous Waste and Substances Sites, nor is it a hazardous waste facility subject to corrective action.

- Based on AST's review of the Regional Water Quality Control Board's GEOTRACKER database, there is no documentation or records pertaining to any environmental concerns, activities or violations at the Project site. The Project site does not have an active Cease and Desist Order (CDO) or Cleanup and Abatement Order and is not a solid waste disposal site. The Project site is not an "active" or "open case" on the SWRCB list of leaking underground storage tanks, underground storage tanks, or Spills, Leaks, Investigations and Cleanup sites.
- The Project site was identified in the regulatory databases under HAZNET (data extracted from the copies of hazardous waste manifests received each year by the DTSC and the Hazardous Waste Tracking System, which collects manifest copies from the generator and destination facility) According to this data, 45 tons of asbestos-containing building material was hauled off from the site and deposited in a landfill facility. However, no violations were reported or associated with the property.

Accordingly, the Project is not located on a site included on any list compiled pursuant to Section 65962.5 of the Government Code, and the exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

#### Site Conditions

AST also conducted a site reconnaissance of the Project site and observed the following:

- no vents, hatches, or unusual pipes visible to the naked eye protruding from the ground were observed
- no pad mounted or pole mounted transformers were observed
- no septic systems, drywells, pits or sumps, or groundwater wells were observed
- no signs of any major stains or any unusual or potentially hazardous chemicals, drums, or containers that spilled, leaked or were left in the open were observed
- no signs of any unusual spills or soil discoloration or odors or vegetation distress were observed
- no sign of storage of hazardous material was observed inside the buildings, except for some household cleaning supplies
- no visual indicators of current on-site aboveground or underground storage tanks were identified or observed, and there are no reported active or abandoned underground or aboveground storage tanks

Due to the age of the structures at the Project site there is a chance that lead-based paint (LBP) and asbestos-containing building material may have been used during construction of the existing buildings. The Phase I ESA recommends that the property owner consult with a certified Risk Assessor prior to commencement of any demolition or improvements or any construction activities that disturb materials or/ paints at the site to determine options for control of possible ACM and LBP hazards. Local and State regulations apply to ACM and LBP in association with building demolition and renovations, and worker and occupant protection. Therefore, the Phase I ESA recommends that ACM and LBP testing and assessment be undertaken.

The Project poses a low to no threat to human health and safety, and to the environment. An exception under CEQA Guidelines Section 15300.2(e) does not apply to the Project.

#### **f): Historic Resources**

Per CEQA Guidelines Section 15300.2(f), a categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.



Information presented in the following portion of this CEQA document is derived from the following primary source:

- Preservation Architecture, Boys and Girls Clubs of the Peninsula (BGC) at 201 W. Orange Avenue Historic Resource Evaluation (HRE), February 18, 2024, attached as **Appendix D**.

The purpose of the HRE is to evaluate the built resource at 201 W. Orange Avenue and to determine whether it is or is not a historic resource pursuant to CEQA. This determination is based on the historical criteria of the California Register of Historical Resources. This effort has been prepared on the bases of site visits, City of South San Francisco permit research, San Mateo County records, along with applicable historical and historic architectural research including historical newspapers, maps and directories.

The existing Building 1 (the existing BGCP Clubhouse) building was constructed in 1961-1962 for the Boys' Club of South San Francisco, which relocated to this site from their previous location on Grand Avenue. Originally a boys' club under the national Boys' Clubs of America, the non-profit organization has served boys and girls since 1990 under the integrated Boys and Girls Clubs of America. The SSF Boys' Club has since been the Orange Park Clubhouse of the Boys and Girls Clubs of the Peninsula.

When first constructed, the SSF Boys Club stood alongside the tracks and right-of-way of the Southern Pacific Railway. In the late-1990s, that surface rail track was replaced in 20023 by the undergrounded BART extension to the SF International Airport. The existing parking lot was added when the rails were removed.

The existing BGCP includes three buildings. Its original buildings include a front building (Building 1) with a mix of office, communal and recreational uses, and the central building (Building 2) is a high-bay gymnasium. Those two buildings were permitted and constructed in 1961, with gym construction extending into 1962. The architect for these buildings is Paul D. Markling and Associates of South San Francisco. A third and relatively small structure for storage use was added to the rear of the gym in 1968.

### Historic Context

The BGCP Orange Park Clubhouse's historic context is as a youth-serving recreational facility and, more specifically, the development of clubs organized by the Boys' Clubs of America and, since 1990, the Boys and Girls Clubs of America. There are 29 locations of Boys and Girls Clubs of America in San Mateo County, more than 100 Boys and Girls Clubs in California, and nearly 1,000 nationwide, each serving their local community.<sup>9</sup>

### **Historic Evaluation**

The BGCP Orange Park Clubhouse has not previously been evaluated for historic resource eligibility. The following evaluates the buildings using California Register (CR) evaluation criteria. To be eligible for listing on the California Register, a resource must be historically significant at the local, state, or national level, under one or more of the following four criteria:

1. *Is it associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States?*

One directly associated event of historic interest is identifiable for the BGCP Orange Park Clubhouse, which is the laying of the cornerstone for the new SSF Boys' Club in July of 1961 by former U.S. President Herbert Hoover. This event was documented in news stories, and the cornerstone remains on the building. Based on this singular historic event, the BGCP Orange Park Clubhouse meets this California Register criterion.

2. *Is it associated with the lives of persons important to local, California, or national history?*

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<sup>9</sup> Boys' and Girls' Clubs of America, accessed at: <https://bgclubsca.com>

Former U.S. President Herbert Hoover is associated with the BGC's origins and based on this singular association, the BGCP Orange Park Clubhouse meets this California Register criterion.

3. *Does it embody the distinctive characteristics of a type, period, region, or method of construction, or does it represent the work of a master, or possesses high artistic values?*

The front building (Building 1) has a modicum of Modern architectural design, but its design and construction lack distinction, and its original character has been altered over time. The Gym (Building 2) had a few modest original design elements, which have since been removed. The later rear addition (Building 3) is historically age eligible (greater than 50 years old), but its construction is a simple concrete block box. Thus, the buildings comprising the BGCP Orange Park Clubhouse are not distinctive for design or for any potentially important or unique means of construction. The buildings do not have high artistic value.<sup>10</sup> The BGCP Orange Park Clubhouse buildings are typical rather than distinctive of mid-century design and construction. Its architects at Paul D. Markling and Associates (for whom a small number of projects are identifiable) were modestly successful but add no historic artistic value to the building. The buildings are of no historic architectural importance, so do not meet this California Register criterion.

4. *Does it yield, or have the potential to yield, information important to the prehistory or history of the local area, California, or the nation?*

The BGCP Orange Park Clubhouse property and structure have not yielded and do not appear to have the potential to yield additional prehistoric or historic information. Therefore, the property does not meet this California Register criterion.

In summary and relative to this modest resource, a historic event (California Register criterion 1) and historically important individual (California Register criterion 2) coincide with former President Herbert Hoover having presided over the dedication ceremony of this building in the summer of 1961. These criteria are in evidence in the cornerstone that is mounted in the block wall to the left of the north side entrance, which was pictured at the groundbreaking ceremony with President Hoover, who was a champion of the Boys' Clubs of America. ☐

#### Historic Integrity

To achieve historic significance under the California Register, a resource must meet criteria and retain historical integrity that conveys its basis of historic importance in the present time. The historic basis for the BGCP Orange Park Clubhouse property is its association with a historic event and its association with a historic person, both dating to the building's dedication on July 16, 1961.

The California Register identifies "integrity" under seven aspects; location, setting, association, feeling, design, workmanship and materials. For a resource to retain integrity, the majority of these seven aspects must be substantially intact. ☐

Relative to its cornerstone (which records these identified historic associations), historic location is intact. Conversely, historical setting and feeling are not intact relative to these associations because additional development of the facility followed this dedication date, as did subsequent and substantial changes to the site, its building and surroundings. Given the focused associations identified as being potentially historic, only location and association are intact, whereas the other five aspects of integrity are not. While an historic event and person are identifiably associated with the Boys and Girls Clubs of America, the originally modest and since substantially altered site and building do not convey those bases of significance. Rather, a singular element (the cornerstone) is the only evidence of this event (the cornerstone may also have been relocated from its original

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<sup>10</sup> Painted murals were added to the concrete walls flanking the entry, and those murals date to 2011, so cannot be evaluated as potentially historic. This assessment does not to dismiss their present relevance or interest.

location). In conclusion, the existing BGCP Orange Park Clubhouse does not have identifiable and substantial intact historic integrity based on the California Register criteria.

The Project would not cause a substantial adverse change in the significance of a historical resource, and an exception under CEQA Guidelines Section 15300.2(f) does not apply to the Project.

## Sources

AST Inc. Geotechnical, *Phase I ESA for the Boys & Girls Clubs of the Peninsula*, February 2025 (**Appendix C**)

Bay Area Air Quality Management District, *2022 CEQA Guidelines*

BART, *San Francisco Airport Extension, Line, Trackwork and Systems Plan and Profile*, March 5, 2004

Boys' and Girls' Clubs of America, accessed at: <https://bgclubsca.com>

Boys' and Girls' Clubs of the Peninsula and DevCon Construction Inc., et.al, *Orange Park Clubhouse Application Materials*, February 2025

Institute of Transportation Engineers (ITE), *Trip Generation Manual*, 11th Edition

Lamphier-Gregory, *CalEEMod Emissions Calculator Results for Construction-Period Emissions* (**Appendix A**)

Langan Engineers, **Geotechnical Investigation of the BGCP Site**, March 21, 2025 (**Appendix B**)

Preservation Architecture, *Boys and Girls Clubs of the Peninsula (BGC) at 201 W. Orange Avenue Historic Resource Evaluation (HRE)*, February 18, 2024 (**Appendix D**)

South San Francisco, City of; *General Plan Update, Zoning Code Amendments, and Climate Action Plan and Program EIR*, 2022

South San Francisco Municipal Code, Zoning Ordinance, accessed online at:  
<https://ecode360.com/43450037>

South San Francisco, *Transportation Analysis Guidelines*, 2022

## **Appendix A**

### **CalEEMod Emissions Calculator Results for Construction-Period Emissions**

Lamphier-Gregory



## **Appendix B**

### **Geotechnical Investigation of the BGCP Site**

Langan Engineers, March 21, 2025

## **Appendix C**

### **Phase I ESA for the Boys & Girls Clubs of the Peninsula**

AST Inc. Geotechnical, February 2025

## **Appendix D**

### **Boys and Girls Clubs of the Peninsula at 201 W. Orange Avenue Historic Resource Evaluation**

Preservation Architecture, February 18, 2024)