Initial Study and CEQA Analysis for the Westborough Preschool Expansion Project, South San Francisco, San Mateo County, California

JANUARY 12, 2026

PREPARED FOR

City of South San Francisco

PREPARED BY

SWCA Environmental Consultants

INITIAL STUDY AND CEQA ANALYSIS FOR THE WESTBOROUGH PRESCHOOL EXPANSION PROJECT, SOUTH SAN FRANCISCO, SAN MATEO COUNTY, CALIFORNIA

CITY ADMINISTRATIVE DRAFT 2

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Appendix C – SWCA Environmental Consultants. *Westborough Preschool Cultural Resources Technical Report.* November 4, 2025. **(Available upon request to qualified individuals and organizations)**

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1 PROJECT INFORMATION

1.	**Project Title:**	Westborough Preschool Expansion Project
2.	**Lead Agency Name and Address:**	City of South San Francisco Planning Division 315 Maple Avenue South San Francisco, CA 94080
3.	**Contact Person:**	Christy Usher, Senior Planner christy.usher@ssf.net
4.	**Project Location:**	2360 Galway Drive South San Francisco, CA 94080 Assessor's Parcel Numbers (APNs): 091-150-080 and 091-150-090
5.	**Project Sponsor's Name and Address:**	City of South San Francisco Jake Gilchrist, Director of Capital Projects 400 Grand Avenue South San Francisco, CA 94080
6.	**Existing General Plan Designation:**	PR - Parks and Recreation
7.	**Existing Zoning:**	PR - Parks and Recreation
8.	**Requested Permits/Approvals:**	Adoption of CEQA document Design Review Approval of Address Change City Building Permit and Youth, Parks, and Community Enrichment Approval Grading Permit

2 PURPOSE OF THIS CEQA DOCUMENT

The purpose of this document is to provide the required environmental review of the proposed Westborough Preschool Expansion Project (Project), pursuant to the California Environmental Quality Act (CEQA). Pursuant to State CEQA Guidelines Section 15060 through 15065, the City of South San Francisco (City), as the Lead Agency for environmental review of this Project, is required to commence the environmental review process according to the following processes:

1. "Once a lead agency has determined that an activity is a project subject to CEQA, the lead agency shall determine whether the project is exempt from CEQA" (State CEQA Guidelines Section 15061(a)). A project is exempt from CEQA if it is "exempt by statute (commencing with Section 15260)" or "exempt pursuant to a categorical exemption (commencing with Section 15300) and the application of that categorical exemption is not barred by one of the exceptions set forth in Section 15300.2" (State CEQA Guidelines Section 15061(b)).
2. "Following preliminary review, the Lead Agency shall conduct an Initial Study to determine if the project may have a significant effect on the environment" (State CEQA Guidelines Section 15063(a)).
3. "If the agency determines that there is substantial evidence that any aspect of the project, either individually or cumulatively, may cause a significant effect on the environment, the Lead Agency shall do one of the following:
    - Prepare an EIR [Environmental Impact Report],
    - Use a previously prepared EIR which the Lead Agency determines would adequately analyze the project at hand; or
    - Determine, pursuant to a program EIR, tiering, or another appropriate process, which of a project's effects were adequately examined by an earlier EIR or negative declaration [ND]. Another appropriate process may include, for example . . . approval of residential projects consistent with a community plan, general plan or zoning as described in Section 15183" (State CEQA Guidelines Section 15063(b)).
4. "The lead agency shall then ascertain which effects, if any, should be analyzed in a later EIR or negative declaration [MND]" (State CEQA Guidelines Section 15063(b)).

The City has determined that the proposed Project requires consideration of discretionary actions or approvals, including, but not limited to, a design review permit; approval of address change; City building permit and youth, parks, and community enrichment approval; and a grading permit. As such, the proposed Project is subject to CEQA.

2.1 Initial Study

Pursuant to State CEQA Guidelines Section 15063, this document consists of an Initial Study prepared by the City, as Lead Agency, intended to provide the City's decision-making bodies (i.e., the South San Francisco Planning Commission and City Council) with information as to the potential environmental effects of the proposed Project. This Initial Study provides substantial evidence that supports the conclusion that the proposed Project qualifies as a "project consistent with a community plan or zoning" pursuant to State CEQA Guidelines Section 15183. Consistent with the State CEQA Guidelines, this Initial Study contains the following information:

- A description of the proposed Project, including its location.

- An examination of whether the proposed Project is consistent with existing zoning, the *City of South San Francisco 2040 General Plan Update* (Shape SSF 2040 or SSF 2040 General Plan), and other applicable land use controls.
- An identification of the existing environmental setting.
- An identification of potential environmental effects of the proposed Project, using a checklist method that includes adequate explanation and evidence to support the checklist entries.

The checklist also includes a determination of whether the proposed Project would result in significant effects that are peculiar to the proposed Project or its site that were not adequately examined in an earlier EIR, such that the proposed Project may qualify as a project that is consistent with a Community Plan, General Plan, or zoning, pursuant to California Public Resources Code (PRC) Section 21083.3 and State CEQA Guidelines Section 15183. The CEQA Checklist also provides information as to which environmental effects, if any, should be analyzed in a later EIR, ND, or MND.

2.2 Project Consistent With a Community Plan or Zoning

PRC Section 21083.3 and State CEQA Guidelines Section 15183 provides that, "projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." These provisions of CEQA are intended to streamline the environmental review of certain types of projects, and to reduce the need to prepare repetitive environmental studies. These provisions of CEQA apply only to projects that are consistent with a community plan adopted as part of a general plan, a zoning action that zoned or designated the parcel on which the proposed Project would be located to accommodate a particular density of development, or the general plan of a local agency. Per State CEQA Guidelines Section 15183(i)(2), "'consistent' means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan." An EIR must have been certified by the Lead Agency for the community plan, the zoning action or the general plan, for these provisions to apply.

State CEQA Guidelines Section 15183(b) provides that, in approving a project meeting these requirements:

> . . . a public agency shall limit its examination of environmental effects to those impacts that the agency determines, in an initial study or other analysis:
>
> (1) Are peculiar to the project or the parcel on which the project would be located,
>
> (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan, with which the project is consistent,
>
> (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
>
> (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the prior EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

When reviewing the environmental effects of the proposed Project pursuant to these provisions, an effect of the proposed Project on the environment shall not be considered peculiar to the proposed Project if uniformly applied development policies or standards have been previously adopted by the City. A finding must have been made that the applicable development policies or standards will substantially mitigate environmental effects when applied to future projects, unless substantial new information shows that the policies or standards will not substantially mitigate the environmental effect. The finding shall be based on substantial evidence, which need not include an EIR.

This Initial Study/CEQA Checklist includes information to determine whether the proposed Project is consistent with the development density established by existing zoning and Shape SSF 2040. This CEQA Checklist also examines whether the potential impacts of the proposed Project have already been addressed in the City's *Program Environmental Impact Report for the General Plan Update, Zoning Code Amendments, and Climate Action Plan , City of South San Francisco, San Mateo County, California* [1] (General Plan EIR), or whether the proposed Project may have Project-specific significant effects that are peculiar to the proposed Project or its site.

2.3 Potential for Additional Environmental Review

The provisions of State CEQA Guidelines Section 15183 for projects that are consistent with a community plan or zoning would not apply to the proposed Project if it were inconsistent with the development density established by Shape SSF 2040 and applicable zoning regulations. These provisions of CEQA would not apply if the proposed Project would have Project-specific significant environmental effects that are peculiar to the proposed Project or its site, or if the proposed Project would result in new or more severe significant environmental effects than were previously addressed in the prior General Plan EIR (also referred to as the "Prior EIR" or the Program EIR" in this analysis).

Under such circumstances, the proposed Project would trigger preparation of an MND or EIR. This Initial Study fully analyzes the environmental impacts of the proposed Project to determine the most appropriate approach for CEQA documentation of the proposed Project in light of the certified General Plan EIR and provides substantial evidence to support the conclusion that the proposed Project is exempt from further CEQA review pursuant to State CEQA Guidelines Section 15183.

[1] California Governor's Office of Planning and Research, State Clearinghouse. 2021. *CEQAnet Document for State Clearinghouse No. 2021020064*. Available at: https://ceqanet.lci.ca.gov/Project/2021020064. Accessed November 2025.

3 PROJECT DESCRIPTION

3.1 Project Location

The city of South San Francisco San Mateo County in the San Francisco Bay Area. South San Francisco is bordered by the cities of Daly City and Brisbane to the north, Colma and Pacifica to the west, and San Bruno to the south. The city's eastern border is formed by the San Francisco Bay; farther to the west is the Pacific Ocean beyond the cities of Colma and Pacifica. U.S. Highway 101 (US 101), Interstate (I-) 280, and I-380 run through or are adjacent to the city, providing regional access and connectivity to the greater Bay Area. The San Francisco International Airport (SFO) is adjacent to the southeast border of the city.

The Project site has an approximately 0.48-acre (21,125-square-foot) footprint that is predominantly located within the boundaries of the City-owned Westborough Park located at 2350 Galway Drive (APN 091-150-080); the Project site also includes small areas of the southeast adjacent parcel located at 2380 Galway Drive (APN 091-150-090), which is also a City-owned property and is occupied by the City's Alice Peña Bulos Community Center (community center). The Project site is bound by the Westborough Fire Station No. 64 and duplexes to the north; Westborough Boulevard, a four-lane east–west major arterial roadway, and duplexes to the south; Galway Drive, a two-way minor arterial roadway, and duplex residences to the east; and Westborough Park facilities (tennis court, picnic shelter, picnic areas, lawn, and parking lot) to the west.

The location of the Project site and surrounding land uses are shown in Figure 3-1, *Project Site Location and Surrounding Land Uses*.

3.2 Existing Conditions

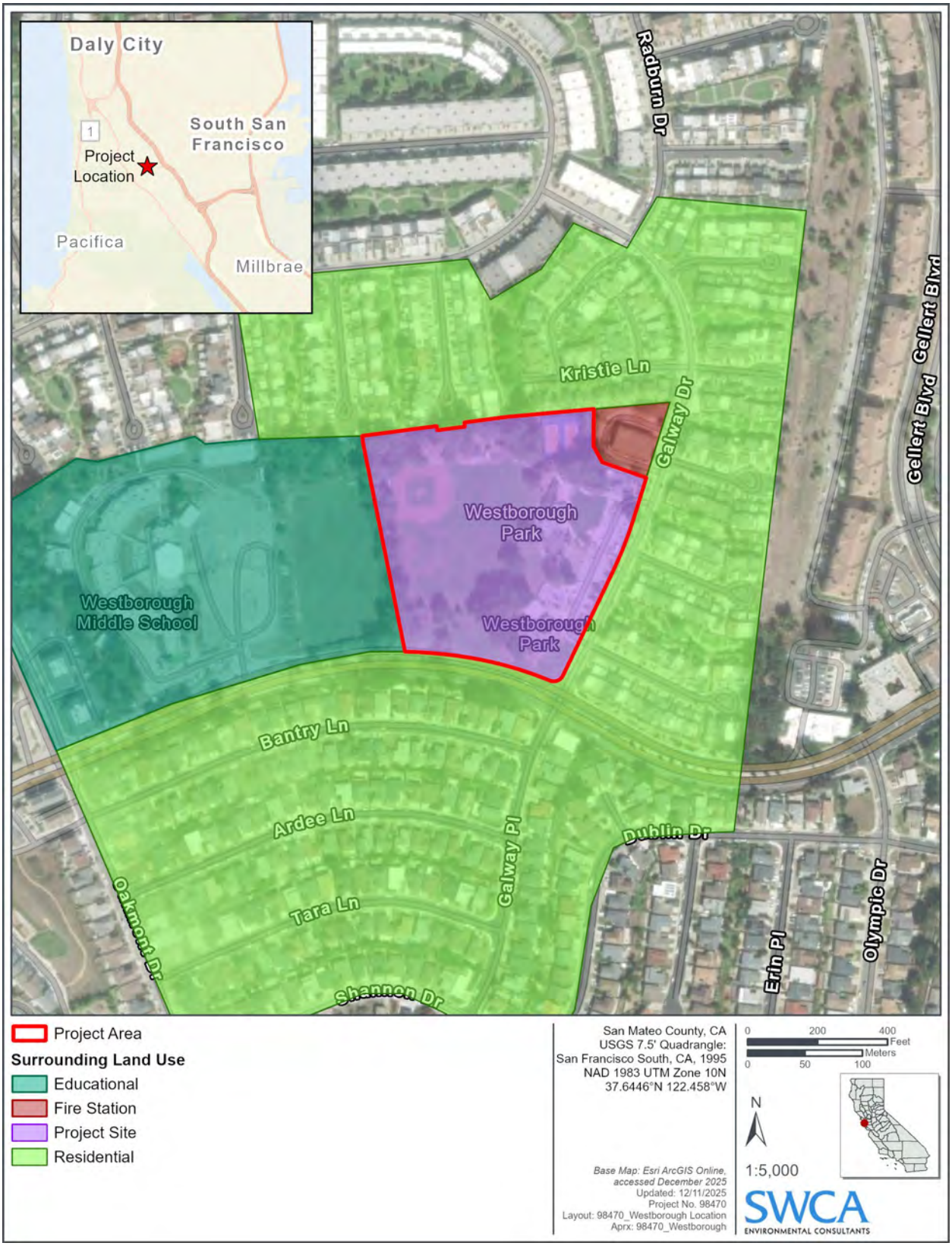
Westborough Park includes the approximately 7,053-square-foot community center, 1,940 square feet of modular classrooms, two public restrooms totaling 856 square feet, a picnic shelter, a picnic patio, lawn areas, two tennis courts, a basketball court, a softball field, a maintenance yard, and waste receptacles. The area for the proposed preschool is in the northeastern corner of Westborough Park, which is currently occupied by one of the public restrooms (approximately 341 square feet), the maintenance yard, and several dumpsters. A portion of one of the maintenance roads that serve the park and small grassy areas are also within the footprint of the proposed preschool. The Project site slopes from northeast to southwest, with elevations varying from about 420 to 411 feet above mean sea level. The Project site appears to have been open space or used for agricultural purposes prior to 1980.[2]

The City's Parks and Recreation Department currently offers a Preschool Early Learning Program for children ages 2.5 to 5 years at 2380 Galway Drive.[3] One classroom is located in the community center, and two classrooms are located in standalone modular buildings. The three classrooms have capacity for 59 children, with as many as eight staff members on-site during preschool hours. The preschool facilities include a playground that is available for public use outside school hours (7:30 a.m.–6:00 p.m., Monday–Friday).

[2] Nationwide Environmental Title Research, LLC (NETROnline). 2025. *Historic Aerials.* Available at: https://www.historicaerials.com/viewer. Accessed July 22, 2025.

[3] City of South San Francisco Parks and Recreation Department. 2025. Child Care. Available at: https://www.ssf.net/Departments/Parks-Recreation/Divisions/Recreation-Division/Child-Care. Accessed July 16, 2025.

Figure 3-1. Project Site Location and Surrounding Land Uses



The preschool has a 3-to-4-year waiting list, and the need for childcare in the community has led to the desire to increase enrollment capacity at the Westborough Preschool location.[4] The community center is available to the public Monday through Saturday from 8:00 a.m. to 5:00 p.m. The space is currently shared by the preschool, community programs, and rental uses; however, this arrangement has proven inefficient, and the proposed Project aims to resolve these operational issues. The existing parking lot contains 59 parking spaces, consisting of 54 standard spaces, one van-accessible space, one standard accessible space, and three designated pick-up/drop-off spaces. The three pick-up/drop-off spaces serve the preschool during signed hours and are available for public use outside of those hours. Children are received between 7:30 a.m. and 9:30 a.m. and picked up between 4:00 p.m. and 6:00 p.m. Children are walked in and walked out of the preschool by their guardians.

The Project site is served by existing utilities. Lines for water, sanitary sewer, and storm drains ranging from 8 to 12 inches in diameter cross the park. Water is provided by Westborough Water District (WWD), which serves the area between I-280 and Skyline Boulevard and between King Drive in Daly City and the city of San Bruno.[5] WWD also owns the sanitary sewer system in the Project area. Under an agreement, the sewer system is maintained by the North San Mateo County Sanitation District (NSMCSD) through a contract with the City of Daly City. The storm sewer system at the Project site is maintained by the City's Public Works Department.[6] Electricity is provided by Peninsula Clean Energy and delivered via Pacific Gas and Electric Company (PG&E) underground lines.[7]

3.3 Project Overview

The proposed Project includes the removal of the existing maintenance yard, six trees (including one protected tree), and other minor park infrastructure; demolition of a 341-square-foot public restroom; and construction of a new 7,135-square-foot preschool facility, 197-square-foot public restroom, and ancillary facilities. The proposed Project improvements are shown on Figure 3-2, *Project Site Plan*. The new preschool facilities would include a new building with five indoor classrooms, one covered outdoor classroom, and administrative office space.

The Project would also include the following elements:

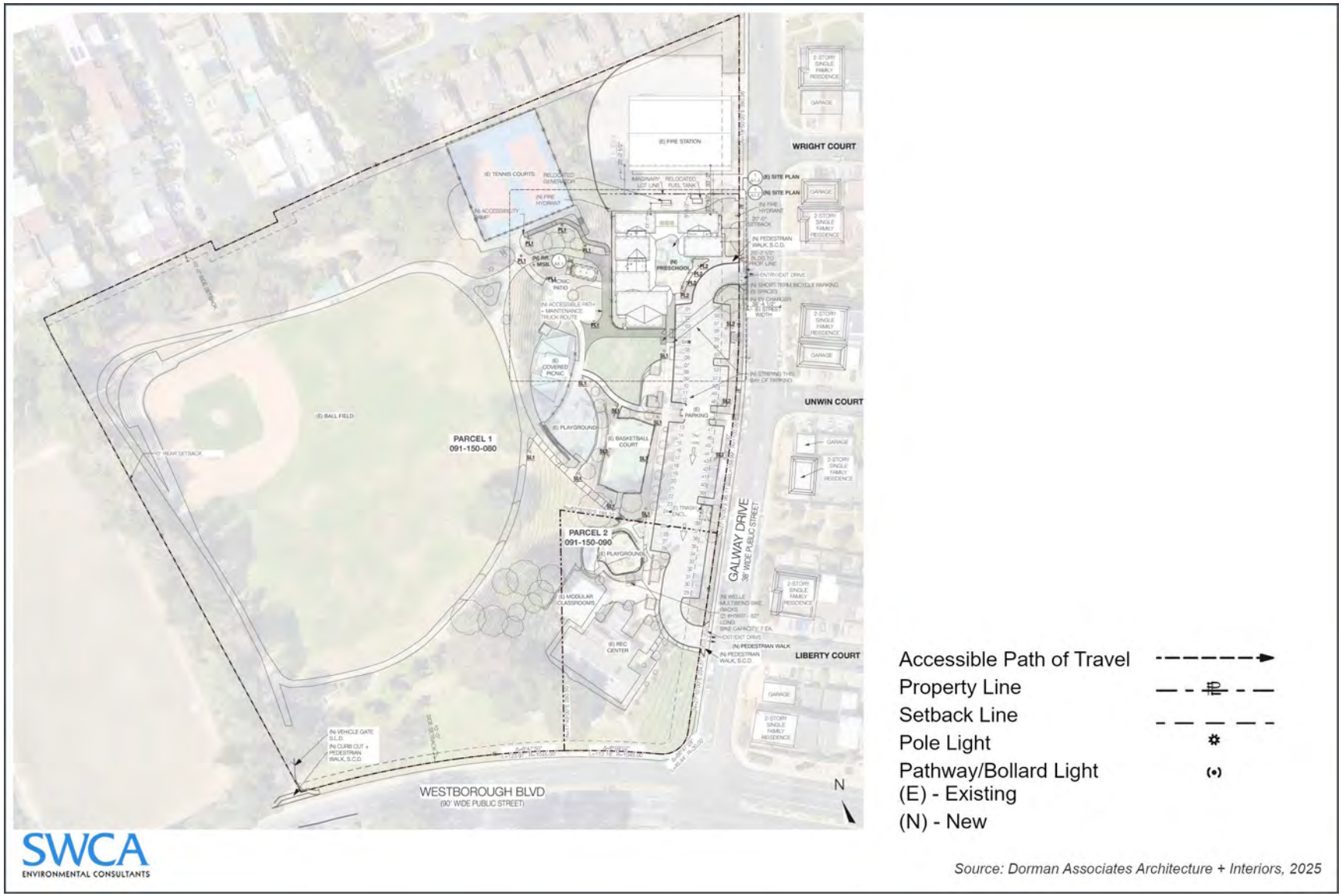
- An outdoor play area adjacent to the preschool that would include a trike path, climbing structures and natural play areas. The play area would be underlain by pea gravel, engineered wood fiber, and artificial turf. Features would include a climbing structure with slides, stepper cluster, balance posts, tunnel, chalkboard, mud kitchen, log seats, table with seating stumps, sand box, and hut. The play area would be surrounded by wood and welded-wire mesh fencing.

[4] City of South San Francisco Parks and Recreation Department, Child Care, 2025.

[5] Westborough Water District (WWD). 2025. About WWD. Available at: https://www.westboroughwater.org/about. Accessed July 22, 2025.

[6] City of South San Francisco Public Works Department. 2025. Operations and Maintenance Division. Available at: https://www.ssf.net/Departments/Public-Works/Divisions/Maintenance-Operations-Division. Accessed July 22, 2025.

[7] City of South San Francisco. 2025. Community Choice Energy. Available at: https://www.ssf.net/Departments/City-Manager/Sustainability/Community-Choice-Energy. Accessed July 22, 2025.



SWCA ENVIRONMENTAL CONSULTANTS

Source: Dorman Associates Architecture + Interiors, 2025

Figure 3-2. Project Site Plan.

- New retaining walls and fencing adjacent to the new preschool. Concrete block retaining walls ranging from approximately 2 to 4 feet in height and new slatted chain-link fences approximately 6 feet in height would be constructed adjacent to the north of the new preschool building. Similar concrete block retaining walls would also be constructed along the western and southern façades of the preschool. An open steel fence would be installed along the top of the western retaining wall.
- Repainting of the parking lot to implement the proposed parking plan and installation of new signage.
- Realignment of a section of maintenance road, installation of a cattle gate, and construction of a new curb cut at the Galway Drive parking lot that would connect with the existing park maintenance road network.
- Improvements to the access point of the maintenance road entrance off of Westborough Boulevard, including sidewalk, paving and curb improvements and a new cattle gate.
- Construction of an Americans with Disabilities Act (ADA)-compliant ramp to access existing tennis courts.
- New landscaping and irrigation facilities, including 16 trees and native- and low-water plants.
- New stormwater bioretention and treatment facilities.
- Improvements to sidewalks along Galway Drive.
- New bicycle racks by the existing community center and new preschool facilities.

3.3.1 *Preschool Expansion*

The new preschool facilities would be located at the northwest corner of Westborough Park. It would have five indoor classrooms and one outdoor classroom, which would increase student capacity from 59 to 100 children and require up to 15 staff on-site. The proposed exterior materials for the preschool building would be a combination of stucco, fiber cement, composite shiplap siding, and exposed stained wood elements and would be surrounded with a wood and metal fence. Buildings would be one story with a maximum height of 17 feet 8.5 inches. New buildings would meet or energy efficiency requirements and be all-electric.

The community center would continue to function as a preschool until construction is complete; preschool operations would move to the new preschool facilities immediately following completion.

Westborough Park encompasses approximately 432,048 square feet. Existing development covers roughly 2.5% of the parcel (10,876 square feet). Following construction of the new preschool, restroom, and associated improvements, total structural coverage would increase to 20,198 square feet, or approximately 4.6% of the parcel. This coverage remains well below the City's maximum lot coverage threshold of 25% for parcels zoned Parks and Recreation (PR).

3.3.2 *Site Access, Circulation, and Parking*

Vehicle ingress and egress to the Project site would be provided via two existing driveways on Galway Drive. The proposed Project would not alter the parking lot's existing circulation pattern—vehicles would enter via the northern driveway and exit via either the northern or southern driveway. Traffic circulation on Galway Drive and access to Fire Station #46 would not be altered. Vehicle circulation patterns under the proposed Project are shown on Figure 3-3, *Proposed Traffic Circulation Pattern.*

Figure 3-3. Proposed Traffic Circulation Pattern.

The proposed Project would maintain the existing 59 parking spaces. It would convert six regular stalls adjacent to the new preschool to student receiving spaces; three of these spaces would be ADA-compliant, one would be van-accessible, and three would be EV charging spaces. The proposed Project would convert the three existing student receiving spaces at the south end of the parking lot into standard parking stalls. The existing ADA-compliant stalls would remain ADA-compliant, and three standard stalls would be converted to compact stalls. The student receiving spaces would be restricted to preschool use during pick-up/drop-off hours, but would be available to the public and staff outside those designated hours.

3.3.3 *Landscaping and Lighting*

The proposed Project would include the removal of six trees on-site, including one protected 24-inch-diameter Monterey cypress (*Hesperocyparis macrocarpa*) at the location of the proposed restroom building. The additional trees to be removed include one 6-inch Manuka (*Leptospermum scoparium*), one 12-inch Manuka, and three trees less than 48-inches in diameter, including one European hornbeam (*Carpinus betulus*) and two red maple (*Acer rubrum*). Tree removal will be overseen by a member of the development team who also serves as the City Arborist. Approximately 16 trees, including eight California buckeye (*Aesculis californica*), two autumn gold maidenhair (*Ginkgo biloba* 'autumn gold'), two crape myrtle (*Lagerstroemia indica*), and four Catalina ironwood (*Lyonothamnus floribundus*) trees will be planted, along with low-water shrubs, perennials, and grasses. All trees would be either 24- or 36-inch box in size. Landscaping would include drought-tolerant and native species with new efficient drip irrigation that meets state Water Efficient Landscape Ordinance (WELO) requirements. Five planting areas would be added on-site for stormwater bioretention and treatment (Appendix A, p. C.3).

3.3.4 *Utilities*

The proposed Project would include the replacement of existing and addition of new wastewater, water, and stormwater drainage throughout the Project site. A new 12-inch lateral and water meter connected to the existing water main in Galway Drive would be installed for potable and irrigation water supply, along with a new fire hydrant to serve the preschool. New 8-inch sanitary sewer laterals would connect the new preschool and public restrooms to the existing 8-inch sanitary sewer main underlying the park. New 8-inch storm drain laterals would connect the new bioretention basins throughout the Project site and overflow would be routed to the existing storm drains in the parking lot.

The Project proposes to treat 100% of the project site's impervious surfaces through a combination of payment of in-lieu fees and bioretention areas, each lined and equipped with underdrains, sized according to Municipal Regional Permit (MRP) Provision C.3 using the flow-based sizing method (0.2 inches/hour). These facilities are designed to manage pre- and post-development stormwater flows for the 25-year, 10-minute storm event, providing treatment and controlled discharge consistent with San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) standards. Stormwater would be routed through the low impact development (LID) stormwater treatment areas and excess stormwater would be directed to the existing stormwater drains in the parking lot.

New underground electrical lines would connect to the preschool, park lighting, and the restroom. No gas infrastructure would be installed.

3.3.5 *Heating, Ventilation, and Air Conditioning*

The proposed Project would be served by a high-efficiency, electric heat-pump heating, ventilation, and air conditioning (HVAC) system designed to provide year-round heating, cooling, and ventilation in compliance with current California Energy Code requirements. Rooftop heat-pump condensing units and

associated mechanical equipment would be centrally located on the building roof, screened from public view, and designed to minimize noise at surrounding uses. The HVAC system would include dedicated outdoor air ventilation with energy-recovery components to improve indoor air quality and overall energy performance. All HVAC equipment would be installed per manufacturer specifications and applicable building and mechanical codes.

3.3.6 *Construction*

Project construction is expected to begin in April 2026 and occur over a period of approximately 12 months, with construction concluding in May 2027. Construction staging would occur on-site. Construction activities would include demolition, site preparation, grading and trenching, building construction, paving, architectural coating, and landscaping.

No cut and fill of soil would be required. Demolition of the existing building and hardscape would generate approximately 700 square feet of debris, which would be off-hauled for recycling or disposal. Six trees would also be removed and chipped. The estimated maximum depth of excavation is anticipated to be approximately 2 feet below ground surface for both the building foundations and new utilities.

Project construction would generate approximately 144 round trip truck trips to haul soils, demolition debris (e.g., concrete, asphalt, building materials, trees, existing utility infrastructure), construction materials (e.g., concrete paving, decomposed granite paving, engineered wood fiber [play safety surfacing]), trees/shrubs, parking meters, irrigation equipment, lighting, play and exercise equipment, site furnishings, fencing, bollards, signage, and art elements.

Existing site materials would be recycled or reused following demolition, when feasible. Various recycled materials would be used in construction, and durable, long-lasting exterior finish materials would be incorporated throughout the Project. Standard construction equipment, including excavators, graders, tractors, loaders, and pavers, would be used during Project construction. No pile driving is proposed.

Construction hours would be limited to 8:00 a.m. to 5:00 p.m., Monday through Friday. Activities may occur between 7:00 a.m. to 8:00 a.m. on weekdays and 9:00 a.m. to 4:00 p.m. on Saturdays, but this would be limited to quiet activities and would not involve engine-driven machinery. Although the City allows construction from 8:00 a.m. to 6:00 p.m. on Saturdays and 10:00 a.m. to 6:00 p.m. on Sundays, weekend construction is not anticipated and would require permission from the City.

Access for construction would be from the parking lot through a temporary access gate. Construction staging and materials staging would occur on-site. All work would comply with the Regional Water Quality Control Board (RWQCB) Best Management Practices (BMPs) for stormwater management.

3.4 Required Discretionary Approvals

This Initial Study provides environmental information and analysis in compliance with the California Environmental Quality Act (CEQA), which is necessary for City decision makers to be able to adequately consider the effects of the Project. The City, as the CEQA Lead Agency, has approval authority and responsibility for considering the environmental effects of the proposed Project as a whole. The City is responsible for authorizing and approving the proposed Project.

The proposed Project would require the following discretionary approvals:

- Planning Commission approval
- Design Review permit

- City Building permit
- Grading permit
- Curb cut permit
- Tree removal permit

4 PROJECT'S CONSISTENCY WITH THE GENERAL PLAN AND ZONING

In October 2022, the City adopted Shape SSF 2040 (or SSF 2040 General Plan), which presents the City'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 Shape SSF 2040 and applicable provisions and development standards of Title 20 of the *City of South San Francisco Municipal Code* (SSFMC), as updated commensurate with Shape SSF 2040. To be considered eligible for CEQA streamlining as a Project Consistent with a Community Plan or Zoning per State CEQA Guidelines Section 15183, the proposed Project must be consistent with Shape SSF 2040 and the SSFMC, including as it relates to site-specific policies and permitted densities.

4.1 Consistency with Shape SSF 2040

4.1.1 *Guiding Principles*

Among the Guiding Principles for Shape SSF 2040 is the intent to "provide high quality and accessible services, facilities, and amenities for residents at all stages of their lives."[8]

Consistency: The intent of the proposed Project is to address existing demand for preschool services by providing enhanced and expanded facilities that meet current standards, while relocating the preschool from the Community Center to free up space for increased community programming. The preschool has a three to four year waiting list and the proposed Project would accommodate substantial growth in the population by increasing the enrollment capacity for the families in the neighborhood. The proposed Project is fully consistent with this Guiding Principle of Shape SSF 2040.

4.1.2 *Land Use*

The Project site is designated as Parks and Recreation (PR) in Shape SSF 2040, which is in the Civic land use category (see Figure 3-1, *Project Site Location and Surrounding Land Uses*).The Civic land use category encompasses a range of public facilities such as schools, parks, and government facilities. The PR land use designation is intended for parks, recreation complexes, public golf courses, and greenways.[9]

Consistency: The City Parks and Recreation Department currently offers a Preschool Early Learning Program at the Project site. The proposed Project's expanded preschool space is intended to accommodate current and waitlisted families and students, and is fully consistent with the intent of this land use classification and the City Parks and Recreation Department's mission to provide opportunities for physical, cultural, and social well-being; protect and enhance the physical environment; and ensure the effective and efficient use of public facilities and open space.[10] The existing community center and modular building currently provide childcare facilities and is consistent with the land uses that are allowed under the PR designation.

[8] City of South San Francisco, *Shape SSF 2040*, 2022, p. 12

[9] City of South San Francisco, *Shape SSF 2040*, 2022, Figure 6 and Table 2 (p. 68)

[10] City of South San Francisco Parks and Recreation Department, Child Care, 2025.

4.1.3 *Policy Framework*

LAND USE AND COMMUNITY DESIGN

> **Policy LU-1.4 Maintain and expand public facilities and services.** Maintain and expand public facilities to better support the community, including schools, libraries, utilities, and recreational spaces, particularly in neighborhoods lacking these resources. Seek opportunities to co-locate new public projects near compatible civic uses such as schools and campuses to create nodes of activity and services.

Consistency: The proposed Project involves the expansion of preschool facilities in order to increase capacity and service to local families. This is consistent with SSF 2040 General Plan Policy LU-1.4 because the nature of the policy states its goal is to expand public facilities to better support the community, including schools. Additionally, the proposed Project is consistent with the land use allowed by the PR designation, which is currently in operation.

> **Policy LU-8.6 Sustainable design in the public realm.** Encourage use of sustainable design features in the public realm, including sustainable building and construction materials, permeable paving, drought tolerant landscaping, and green infrastructure.

Consistency: As described in the Project Description, the proposed Project would utilize sustainable design features, including sustainable building and construction materials, drought-tolerant landscaping, and green infrastructure. Landscaping would include drought-tolerant and native species with new efficient drip irrigation that meets state WELO requirements. The proposed exterior materials for the preschool building would be a combination of stucco, composite shiplap siding, and exposed stained wood elements and would be surrounded with a wood and metal fence.

> **Policy LU-8.9 Ensure ADA accessibility.** Ensure all new developments, public infrastructure and facilities, and transit infrastructure meet ADA accessibility standards.

Consistency: SSF 2040 General Plan Policy LU-8.9 requires that all new developments, public infrastructure, and facilities meet ADA accessibility standards. The proposed Project involves the reconfiguration of the parking lot, including moving two ADA-compliant parking spaces from the south to the north end of the parking lot and providing an additional ADA-compliant parking spot for a total of three ADA-compliant parking spaces. The proposed Project also includes the construction of an ADA-complaint ramp to access the existing tennis courts.

> **Policy LU-9.3: Require quality building materials.** Require high-quality, long-lasting building materials on all new development projects in the city.

Consistency: Construction of the preschool expansion would utilize combination of stucco, composite shiplap siding, and exposed stained wood elements. The proposed Project is fully consistent with SSF 2040 General Plan Policy LU-9.3 and would utilize high-quality, long-lasting building materials, as described in Section 3.3.1, *Preschool Expansion*, of the Project Description.

> **Policy LU-9.5: Orient buildings to public spaces.** When possible, orient buildings to face streets, public spaces, or shared private spaces.

Consistency: As shown in Figure 4-1, *Rendering of Proposed Preschool*, the front of the building and building entrances would face the public roadways and sidewalks. The design of the preschool building is intended to complement the park and existing park infrastructure by providing a welcoming entrance to the public. As such, the proposed Project is consistent with SSF 2040 General Plan Policy LU-9.5, the requirement to orient buildings to face streets, public spaces, or shared private spaces. Additionally, the proposed Project would be adjacent to residential areas, providing inviting frontage for not only the preschool, but also the rest of the park and recreational facilities.

SUBAREAS

> **Policy SA-36.2: Provide Childcare in Westborough.** Explore development of a new childcare center to serve Westborough residents in the Westborough shopping center.

Consistency: The proposed Project aims to expand Westborough Preschool and increase childcare availability for the families within the Westborough neighborhood. Therefore, the proposed Project is consistent with this policy.

4.2 Consistency with Title 20 (Zoning) of the City of South San Francisco Municipal Code

The SSF 2040 General Plan's PR land use designation has a corresponding PR zoning designation, as defined in SSFMC Title 20, *Zoning* (Zoning Ordinance).[11] The Zoning Ordinance was updated consistent with the SSF 2040 General Plan because the land uses, rules and regulations included in the Zoning Ordinance update are intended to be compatible with the goals, policies, and land use designations established in Shape SSF 2040.

4.2.1 *Permitted Uses*

According to SSFMC Table 20.110.002, Use Regulations – Civil Zoning Districts,[12] the PR zoning district permits a variety of uses, including, but not limited to, community gardens, cultural institutions, day care centers, parks and recreation facilities, public safety facilities, and indoor/outdoor sports entertainment.

Consistency: The proposed Project is designed to meet current and anticipated childcare needs within the community. The proposed Project would expand preschool capacity and develop new outdoor play areas, consistent with the permitted uses for day care centers and recreation facilities under the PR zoning designation. These use types are expressly allowed within the PR zoning district. Therefore, the proposed Project, as proposed and operated, would be consistent with the SSFMC land use designation for parcels zoned PR.

[11] City of South San Francisco. 2025. *City of South San Francisco Municipal Code: Title 20 Zoning.* Available at: https://ecode360.com/43450037#43450037. Accessed November 2025.

[12] City of South San Francisco. 2025. *City of South San Francisco Municipal Code: Title 20 Zoning, Section 20.110.002 Use Regulations.* Available at: https://ecode360.com/43450410. Accessed November 2025.

Figure 4-1. Rendering of Proposed Preschool

SWCA ENVIRONMENTAL CONSULTANTS

Source: Dorman Associates Architecture + Interiors, 2025

4.2.2 *Development Standards*

SSFMC Table 20.110.003, Development Standards – Civic Districts,[13] establishes the following development standards for all Civic Zoning Districts. The following development standards apply to the PR zoning district:

LOT SIZE

The minimum lot area for all parcels in the PR zoning district is 43,560 square feet, with a maximum lot coverage of 25%.

Consistency: Westborough Park is 432,048 square feet, well above the minimum lot area. The new preschool facilities would be located at the northwest corner of Westborough Park at the location of the existing maintenance building. The current coverage is 2.5% and after Project completion, the lot coverage would be 4.6%, well below City standards. Therefore, proposed Project would not reduce the lot size or increase the lot coverage over 25% and is consistent with the City's minimum lot size and coverage requirements for the PR zoning district.[14]

MAXIMUM HEIGHT

Maximum building height in the PR zoning district is set at 30 feet. Additionally, building heights in the PR category of Civic zoning districts are sometimes required to comply with SSFMC Chapter 20.300.03 (Airport Land Use Compatibility Plan Consistency),[15] for height allowances and for airspace protection requirements, based on the *Consolidated Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP).[16]

Consistency: The tallest point of the proposed Project would be 17 feet 8.5 inches tall. This is well below the 30-foot maximum height required by the SSFMC for building standards on PR-zoned parcels. As such, the proposed Project is consistent with the SSFMC building height requirements.

SETBACKS

The applicable minimum setbacks within the PR zone are 20 feet for front setbacks, 10 feet for minimum interior side setbacks, 10 feet for minimum street side setbacks, and 0 feet for minimum rear setbacks, except for when abutting a residential district which requires 10 feet.

Consistency: The proposed Project includes the demolition of an existing maintenance building and construction of new preschool facilities, including classrooms and outdoor play areas. The new buildings fronting Galway Drive are set back 20 feet, and the interior side setback is 33 feet from the fire station, consistent with the SSFMC for PR-zoned parcels.

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[13] City of South San Francisco. 2025. *City of South San Francisco Municipal Code: Title 20 Zoning, Section 20.110.003 Development Standards.* Available at: https://ecode360.com/43450411. Accessed November 2025.

[14] Lot coverage is calculated by dividing the total footprint of all structures on the parcel by the total parcel area (432,048 square feet); existing coverage is 10,876 square feet ÷ 432,048 square feet = 0.025 (2.5%), and post-Project coverage is 20,168 square feet ÷ 432,048 square feet = 0.046 (4.6%).

[15] City of South San Francisco. 2025. *South San Francisco Municipal Code: Title 20 Zoning, Chapter 20.300.003 Airport Land Use Compatibility Plan Consistency.* Available at: https://ecode360.com/43450932. Accessed November 2025.

[16] City/County Association of Governments of San Mateo County (C/CAG). 2012. *Consolidated Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.* November. Available at: https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf. Accessed November 2025.

4.2.3 *Parking*

Pursuant to SSFMC Section 20.330.004 (Required Parking Spaces),[17] the required on-site parking spaces for Public and Semi-public land uses are established as one space per employee plus additional parking as provided in the Pick-up/Drop-off plan required pursuant to Section 20.350.014 (Day Care Centers).[18] Section 20.350.014 states that a plan and schedule for the pick-up and drop-off of children shall be provided for review and approval by the Chief Planner. The plan shall demonstrate that adequate parking and loading are provided on-site to minimize congestion and conflict points on travel aisles and public streets.

Consistency: As documented in Appendix D, the vehicle parking provided by the proposed Project would be consistent with the requirements of the SSFMC, including Section 20.330.004 and Section 20.350.014. Therefore, the Project would be consistent with SSFMC parking requirements.

4.3 Conclusions

The proposed Project's development is consistent with the Shape SSF 2040 land use designation for the Project site. The proposed Project does not present any inconsistencies with other SSF 2040 General Plan elements. Similarly, the proposed Project is consistent with applicable PR zoning regulations that apply to the Project site. As such, the proposed Project qualifies as a project that is consistent with a community plan, general plan, and/or zoning, pursuant to State CEQA Guidelines Section 15183.

[17] City of South San Francisco. 2025. *City of South San Francisco Municipal Code: Title 20 Zoning, Section 20.330.004 Required Parking Spaces.* Available at: https://ecode360.com/43451827. Accessed November 2025.

[18] City of South San Francisco. 2025. *City of South San Francisco Municipal Code: Title 20 Zoning, Section 20.350.014 Day Care Centers.* Available at: https://ecode360.com/43452306. Accessed November 2025.

5 INITIAL STUDY/CEQA CHECKLIST

The following Initial Study/CEQA Checklist provides an assessment of the potential environmental impacts that may result from approval and implementation of the proposed Project. Consistent with State CEQA Guidelines Section 15063, this Initial Study identifies potential environmental effects of the proposed Project using a checklist method, with adequate explanation and evidence to support the checklist entries and conclusions. These explanations include narrative analysis of the proposed Project. The checklist uses the following acronyms for CEQA conclusions:

- **No Impact:** environmental factors that would not be affected in any manner
- **LTS:** less-than-significant impacts
- **LTS w/MM:** impacts that would be reduced to less than significant with implementation of mitigation measures identified in an applicable prior program EIR (i.e., the General Plan EIR)
- **SU:** significant and unavoidable impacts

CEQA Section 15183 Checklist

State CEQA Guidelines Section 15183(a) states that, "projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site."

The analysis in the following Initial Study/CEQA Checklist provides an assessment of whether the proposed Project qualifies for streamlined review under State CEQA Guidelines Section 15183. It evaluates the potential environmental impacts of the proposed Project in relation to the impacts identified in the General Plan EIR. The analysis determines whether the potential impacts of the proposed Project were fully evaluated and disclosed in the prior General Plan EIR, and whether uniformly applied development policies or standards as identified in the General Plan EIR would apply to the proposed Project. It also determines whether the proposed Project would have significant effects on the environment that may be peculiar to the proposed Project or the Project site. This Initial Study/CEQA Checklist incorporates by reference the discussion and analysis of all potential environmental impact topics as presented in the General Plan EIR, and indicates the page or pages of the General Plan EIR where this information is found. This CEQA Checklist provides an analysis in support of a determination of whether the proposed Project would result in:

- an equal or less severe impact than previously identified in the General Plan EIR, or
- a new impact, or a substantial increase in the severity of a significant impact as disclosed in the General Plan EIR.

If the severity of a potential impact of the proposed Project would be the same as or less than the severity of the impact as described in the General Plan EIR, the checkbox for "Equal or Less Severe" is checked. If the checkbox is marked as "New or Substantial Increase in Severity," that would indicate that the proposed Project's impacts are either:

- peculiar to the Project or the Project site, pursuant to State CEQA Guidelines Section 15183(b)(1)
- not identified in the General Plan EIR (the prior Program EIR), per State CEQA Guidelines Section 15183(b)(2), including off-site and cumulative impacts, per Section 15183(b)(3), or
- due to substantial new information that was not known at the time the General Plan EIR was certified, per State CEQA Guidelines Section 15183(b)(4)

In such a circumstance, an MND or a new EIR would be required for the proposed Project, focused on those topics that might be indicated as new or substantially more severe effects. Current CEQA Checklist topics that may not have been addressed in the prior General Plan EIR remain applicable to the proposed Project.

Whereas Chapter 4, *Project's Consistency with the General Plan and Zoning*, provides substantial evidence that the proposed Project is consistent with the development assumptions of Shape SSF 2040 and the Zoning Ordinance, the proposed Project is therefore eligible for consideration of CEQA streamlining pursuant to PRC Section 21083.3 and State CEQA Guidelines Section 15183. The City prepared a program-level EIR for Shape SSF 2040 (the General Plan EIR) that is applicable to the proposed Project and Project site, and that Program EIR provides programmatic environmental review of new development that is consistent with Shape SSF 2040, such as the proposed Project.

Reliance on a Prior Program EIR

Pursuant to State CEQA Guidelines Section 15168(a),

> A Program EIR is an EIR that has been prepared on a series of actions that can be characterized as one large project and that are related either:
>
> (1) Geographically,
>
> (2) A logical part in the chain of contemplated actions,
>
> (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
>
> (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

State CEQA Guidelines Section 15168(c) provides that,

> Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared [unless that project is determined to be eligible for a categorical exemption].
>
> (1) If a later activity would have effects that were not examined in the program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration. That later analysis may tier from the program EIR as provided in Section 15152.
>
> (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building CEQA Guidelines intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
>
> (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

A finding of reliance on a prior program EIR may be made concurrently, and in addition to a finding of categorical exemption.

General Plan EIR

Prior to adopting Shape SSF 2040, the City certified the General Plan EIR, which is the prior Program EIR examined in this CEQA analysis to determine whether this prior Program EIR is applicable to the proposed Project, and whether it supports streamlining and/or tiering provisions under CEQA Section 15183. The CEQA analysis for the proposed Project, as provided in the following checklist, evaluates the specific environmental effects of the proposed Project in light of the analysis and conclusions addressed in that prior Program EIR. The General Plan EIR is hereby incorporated by reference and can be obtained on the City's Shape SSF website:

http://shapessf.com/wp-content/uploads/2022/09/SSF-GPU-Final-EIR_Combined.pdf

CEQA STREAMLINING

The General Plan EIR evaluates the environmental impacts of the adoption and implementation of the SSF 2040 General Plan. The General Plan EIR is intended to serve as a source of information in the review of subsequent planning and development proposals, including subsequent environmental review of development projects, for infrastructure provision and individual development proposals, and for public facilities to serve new development. According to the General Plan EIR:

> The City intends and anticipates that the certified Final Program EIR would be utilized in conjunction with existing streamlining provisions provided by CEQA, emerging streamlining techniques such as those related to implementation of the Sustainable Communities Strategy (PRC Section 21155), and other streamlining procedures, including those that may become available in the future. To promote the effective use of City resources, the analysis in this certified Draft Program EIR may be considered the first tier of environmental review and it is the intent of the City that future, project-specific and/or site-specific CEQA documents may utilize this analysis as appropriate.

Tiering refers to a multi-level approach to preparing environmental documents that is codified in PRC Section 21083.3 and State CEQA Guidelines Section 15152.

SIGNIFICANT UNAVOIDABLE IMPACTS

The General Plan EIR and its Initial Study determined that development consistent with Shape SSF 2040 would, for the most part, result in impacts that would be less than significant, or would result in impacts that would be reduced to a level of less than significant with implementation of existing regulatory requirements and policies contained within Shape SSF 2040. However, the General Plan EIR determined that development consistent with Shape SSF 2040 would result in certain significant impacts that could not be avoided:

- **Project-Level Vehicle Miles Traveled:** The SSF 2040 General Plan's Vehicle Miles Traveled (VMT) would result in a significant impact for citywide Total VMT per Service Population and for Work-Based VMT per Employee. The SSF 2040 General Plan would implement General Plan EIR Mitigation Measure (MM) TRANS-1, which would require the City to implement its

Transportation Demand Management (TDM) Ordinance as part of the SSFMC Amendments and parking requirements to reduce Project-generated VMT. MM TRANS-1 also requires the City to update its TDM Ordinance and parking requirements every 5 to 10 years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. However, even with the implementation of the SSF 2040 General Plan policies and actions and implementation of MM TRANS-1, because the effectiveness of VMT reduction strategies cannot be quantified in this programmatic analysis, the City may not achieve the overall VMT threshold reduction level and the impact would remain significant and unavoidable.

- **Project-Level Roadway Safety:** Implementation of the SSF 2040 General Plan would increase vehicle trips on the City's freeway ramps, which would cause vehicle queues to exceed off-ramp storage capacity or exacerbate off-ramps that already experience off-ramp queues exceeding storage capacity, resulting in a potentially significant impact. The SSF 2040 General Plan would implement General Plan EIR MM TRANS-4, which would require the City to work with the California Department of Transportation (Caltrans) to develop improvement measures for freeway off-ramps and adjacent intersections that help manage off-ramp queues to minimize queueing hazards. MM TRANS-1 is also applicable and would be implemented to minimize freeway off-ramp queues. However, even with the implementation of SSF 2040 General Plan policies and actions, MM TRANS-1, and MM TRANS-4, given the uncertainty around specific operational conditions and ability to mitigate such conditions in a constrained right-of-way, this impact remains significant and unavoidable.
- **Cumulative VMT:** Cumulative projects in the nine-county Bay Area may generate new VMT, which would be added to the roadway network within the geographic context. All cumulative projects would be required to comply with county and local ordinances and SSF 2040 General Plan policies that address VMT, as well as mitigate their fair share of impacts related to VMT. Nonetheless, the proposed Project, in conjunction with other past, present, and future projects, would have a cumulatively significant impact related to VMT. The SSF 2040 General Plan would implement General Plan EIR MM TRANS-1, which would require the City to implement its TDM Ordinance as part of the SSFMC Amendments and parking requirements to reduce Project-generated VMT. MM TRANS-1 also requires the City to update its TDM Ordinance and parking requirements every 5 to 10 years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. However, even with incorporation of MM TRANS-1 which would partially reduce VMT impacts, the impacts would remain significant and unavoidable. As the proposed Project's impacts related to VMT are significant and unavoidable, the proposed Project's incremental contribution to the cumulative impact is significant and the contribution to cumulative VMT impacts would be cumulatively considerable.
- **Cumulative Roadway Safety:** Cumulative projects in the nine-county Bay Area may generate new VMT, which would be added to the roadway network, potentially increasing vehicle trips on the City's freeway ramps, which would cause vehicle queues to exceed off-ramp storage capacity or exacerbate off-ramps that already experience off-ramp queues exceeding storage capacity. All cumulative projects would be required to mitigate their impacts, as well as ensure that roadway safety is maintained, and comply with applicable policies in local and regional planning documents. Nonetheless, a cumulatively significant impact related to roadway safety would remain. The proposed Project would implement General Plan EIR MM TRANS-4, which would require the City to work with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections that help manage off-ramp queues. Implementation of MM TRANS-1 would also assist in minimizing freeway off-ramp queues. However, even with incorporation of MM TRANS-1 and MM TRANS-4, the impacts would remain significant and unavoidable. As the proposed Project's impacts to the City's freeway ramps are significant and unavoidable, the proposed Project's incremental contribution to the cumulative impact is considered significant and the contribution to roadway safety cumulative impacts would be cumulatively considerable.

- **Project-Level Conflict with 2017 Clean Air Plan:** The VMT growth facilitated by the SSF 2040 General Plan would constitute an approximately 94% growth through 2040 while population growth facilitated by the SSF 2040 General Plan would constitute an approximately 61% growth through 2040. The forecasted VMT growth would outpace the forecasted population growth facilitated by the SSF 2040 General Plan. Therefore, the SSF 2040 General Plan would be considered inconsistent with the Bay Area Air District's (formerly the Bay Area Air Quality Management District [BAAQMD]) *Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area* (2017 Clean Air Plan).[19] The SSF 2040 General Plan would implement General Plan EIR MM TRANS-1, which would achieve the maximum feasible reductions in vehicle travel. However, even with the implementation of the SSF 2040 General Plan policies and actions and MM TRANS-1, because the effectiveness of VMT reduction strategies cannot be quantified in this programmatic analysis, the City may not achieve the overall VMT threshold reduction level. As such, this impact would be significant and unavoidable.
- **Project-Level Criteria Air Pollutants:** Because the SSF 2040 General Plan's projected VMT growth outpaces projected population growth, the SSF 2040 General Plan would result in a cumulatively considerable net increase in criteria pollutants, and this impact would be potentially significant. The SSF 2040 General Plan would implement General Plan EIR MM TRANS-1, which would achieve the maximum feasible reductions in vehicle travel. However, as there is no reasonable mitigation that could be implemented to increase population projections while keeping VMT growth to a minimum in an area that is already fully urbanized and built out, such as South San Francisco, this impact would remain significant and unavoidable after mitigation.
- **Cumulative Conflict with 2017 Clean Air Plan:** Development envisioned by the SSF 2040 General Plan would be inconsistent with the 2017 Clean Air Plan since it would facilitate VMT growth that outpaces the forecasted population growth. As the SSF 2040 General Plan would facilitate VMT growth that outpaces projected population growth through the planning horizon of 2040, the SSF 2040 General Plan is inconsistent with the 2017 Clean Air Plan and would therefore result in a cumulatively considerable net increase in criteria air pollutants and ozone precursors, resulting in a conflict with the applicable air quality plan.
- **Cumulative Criteria Air Pollutants:** Because the SSF 2040 General Plan would result in a projected VMT growth that outpaces the projected population growth through the planning horizon of 2040, the SSF 2040 General Plan would result in a cumulatively considerable net increase in criteria air pollutants and ozone precursors.

Due to these potentially significant unavoidable impacts, the City adopted a Statement of Overriding Considerations as part of the City's approval of Shape SSF 2040.

CUMULATIVE EFFECTS

State CEQA Guidelines Section 15183(j) provides that projects analyzed in relationship to a prior Program EIR do not affect the CEQA requirement to analyze potentially significant off-site or cumulative impacts, if those impacts were not adequately discussed in the prior EIR. If a significant off-site or cumulative impact was adequately discussed in the prior EIR, then this section may be used as a basis for excluding further analysis of that off-site or cumulative impact. Analysis of the proposed Project's potential to contribute to cumulatively significant environmental effects considers whether these cumulative effects have already been addressed in the prior General Plan EIR, but otherwise relies on the streamlining provisions of State CEQA Guidelines Section 15183 to address cumulative effects.

[19] Bay Area Air Quality Management District (BAAQMD). 2017. *Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area*. Adopted April 19. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf. Accessed November 2025.

APPLICABLE MITIGATION

The General Plan EIR is a Program EIR as defined under State CEQA Guidelines Sections 15168 and 15183. As such, subsequent activities pursuant Shape SSF 2040 are subject to General Plan EIR mitigation measures, SSF 2040 General Plan policies, standard conditions for new development, and identified regulatory requirements. The proposed Project is required to comply with applicable policies, regulatory requirements, and/or other mitigation as identified in the General Plan EIR, as applicable. The Project sponsor must agree to incorporate and/or implement these policies, regulatory requirements, and/or other mitigation as part of the proposed Project. Relevant policies and mitigation measures are described under the heading "General Plan EIR Policies and Mitigation Measures".

A dash (–) is used in the CEQA Checklist to indicate that the General Plan EIR did not identify any requirements or mitigation measures for the respective environmental impact, and so none would apply to the proposed Project.

In some instances, the Project applicant has submitted analysis or plans as required pursuant to mitigation, policies and/or standard conditions of approval as identified in the General Plan EIR. In these instances, the CEQA Checklist describes the results or conclusions of these Project-specific analyses or plans in the narrative. The CEQA Checklist also identifies any Project-specific measures that are recommended to provide further clarification for the underlying mitigation, and which have been accepted by the Project applicant and incorporated into the Project design to avoid any greater impacts. Consequently, the Project would not result in new significant impacts or substantially greater impacts than the impacts identified in the General Plan EIR.

I. Aesthetics

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Have a substantial adverse effect on a scenic vista?	LTS	■	□	–	LTS
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	LTS	■	□	–	No Impact
c) As the Project is located in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	LTS	■	□	SSFMC 20.480	LTS
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	LTS	■	□	SSFMC 20.300.09	LTS

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to aesthetics resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to aesthetics are avoided, minimized, or reduced to a less-than-significant level.

SSFMC Chapter 20.480: Design Review. Pursuant to SSFMC Chapter 20.480, the City's design review criteria will be used to ensure that new buildings promote high-quality design, are well crafted and maintained, use high-quality building materials, and are attentive to the design and execution of building details and amenities. The proposed Project must satisfy the following applicable criteria:

1. The site subject to design review shall be graded and developed with due regard for the natural terrain, aesthetic quality, and landscaping so as not to impair the environmental quality, value, or stability of the site or the environmental quality or value of improved or unimproved property in the area.
2. A building, structure, or sign shall reasonably relate to its site and property in the immediate and adjacent areas; not be of such poor quality of design as to adversely affect the environmental quality or desirability of the immediate areas or neighboring areas; and not unreasonably interfere with the occupancy, environmental quality, or stability and value of improved or unimproved real property or have an unreasonable detrimental effect on the health, safety, and general welfare of the community.
3. A site shall be developed to achieve a harmonious relationship with the area in which it is located and adjacent areas, allowing a reasonable similarity of style or originality that does not impair the environmental quality or value of improved or unimproved property or prevent appropriate development and use of such areas or produce degeneration of properties in such areas with attendant deterioration of conditions affecting the health, safety, and general welfare of the City.

4. Parking areas shall be designed and developed to buffer surrounding land uses; complement pedestrian-oriented development; enhance the environmental quality of the site, including minimizing stormwater run-off and the heat-island effect; and achieve a safe, efficient, and harmonious development.
5. Open space, pedestrian walks, signs, illumination, and landscaping (including irrigation) shall be designed and developed to enhance the environmental quality of the site; achieve a safe, efficient, and harmonious development; and accomplish the objectives set forth in the precise plan of design and design criteria.
6. Electrical and mechanical equipment, works and fixtures, and trash storage areas shall be designed and constructed so as not to detract from the environmental quality of the site and concealed by an appropriate architectural structure that uses colors and materials harmonious with the principal structure, unless a reasonable alternative is identified.
7. Components considered in design review shall include, but not be limited to, exterior design, materials, textures, colors, means of illumination, landscaping, irrigation, height, shadow patterns, parking, access, security, safety, and other usual on-site development elements.

SSFMC Section 20.300.09: Design Review for Light and Glare. Consistent with South San Francisco, new development pursuant to the proposed Project will be required to comply with the following design considerations relative to light and glare:

1. All outdoor lighting fixtures must be installed and maintained in conformance with the provisions of the SSMC and applicable building codes.
2. All exterior doors, during the hours of darkness, shall be illuminated with a minimum of one foot-candle of light.
3. Lighting fixtures shall not exceed the maximum height of 25 feet.
4. All lighting fixtures shall be fully shielded, located, and aimed so that the direct illumination from the fixture shall be confined to the property boundaries of the source. Further, any light fixture located within 50 feet of a public right-of-way must utilize an internal or external shield, with the light fixture and shield oriented to minimize light trespass onto adjacent right-of-way line. If an external shield is used, its surface must be painted black to minimize reflections.
5. All motion-sensing light fixtures must conform to all applicable standards of this Division, including the shielding standards.
6. Photometric data from lighting manufacturers shall be submitted to the City by the Project applicant to demonstrate that the lighting requirements have been satisfied.

SSFMC Section 20.300.009: Lighting and Illumination. Section 20.300.009 establishes regulations that allow outdoor lighting for uses and activities consistent with the need for utility, safety and nighttime attractiveness, while minimizing light and glare impacts. Section 20.300.009(C) establishes general standards for outdoor lighting, including maximum heights for lighting fixtures, locations and shielding for lighting fixtures, and submittal of photometric data from lighting manufacturers to the City by the Project applicant to demonstrate that the lighting requirements have been satisfied. Section 20.300.009(D) prohibits the use of certain types of outdoor lighting, including lighting that results in glare to motor vehicles on public right-of-way, outdoor floodlighting, search lights, flood lights, laser lights or similar high-intensity light, and any lighting device located on the exterior of a building or on the inside of a window that is visible beyond the property boundaries of the lot or parcel, with intermittent fading, flashing, blinking, rotating, or strobe light illumination. Section 20.360.004 establishes standards for signs, including display standards and sign illumination, to minimize light and glare impacts.

a) Scenic Vistas

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact AES-1) determined that future development and land use activities that occur within South San Francisco in a manner consistent with Shape SSF 2040 would not have significant adverse effects on a scenic vista.[20]

Development under the SSF 2040 General Plan would result in additional nonresidential development that could alter existing scenic vistas and views, but because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing businesses. Mandatory compliance with design review regulations and policies in the SSFMC, Zoning Ordinance, and SSF 2040 General Plan would ensure that potential impacts related to scenic vistas and views from new development would be less than significant. Specifically, SSF 2040 General Plan Policy LU-9.2 requires the City to encourage distinctive architecture and other elements that add visual interest to buildings to enhance people's perceptions of South San Francisco as an interesting and inviting place.

The Zoning Ordinance contains architectural guidelines, design review criteria, lot and development standards, landscaping requirements, and other regulations for various land uses in order to promote aesthetic quality within the city and to protect scenic vistas and views. In particular, SSFMC Chapter 20.480 (Design Review) establishes the procedure for design review to ensure that development is designed to support SSF 2040 General Plan policies. Consistent with the SSF 2040 General Plan, individual development projects would be required to undergo project-specific environmental review, which may require additional site-specific or Project-specific measures to reduce any potential impacts and would ensure no impacts to scenic views and vistas. The General Plan EIR concludes that, following implementation of these policies, impacts to scenic vistas will be less than significant.

PROJECT ANALYSIS

The Project site is located within Westborough Park. The proposed Project includes the demolition of the existing maintenance building yard and public restrooms, removal of six trees and other minor park infrastructure, and construction of a new preschool facility, public restroom, and ancillary facilities. The proposed Project's highest point would be 17 feet 8.5 inches and would be fully consistent with the building standards of the PR land use designation area. Additionally, the proposed Project, as described in Section 3.3.1, *Preschool Expansion*, of the Project Description, also includes various other improvements to Westborough Park. As discussed under CEQA Checklist Question 5.I.c, these improvements would not negatively affect scenic quality and, due to their nature, do not have the potential to obstruct views of the Project site or more distant views. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, construction and use of the Project site would not have significant adverse effects on a designated scenic vista or a designated scenic resource. The proposed Project would pose a less-than-significant impact on designated scenic resources and scenic vistas (CEQA Checklist Question 5.I.a), and no mitigation is required.

[20] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact AES-1, p. 3.1-12

b) Scenic Resources within a State Scenic Highway

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact AES-2) concluded that future development and land use activities that occur within South San Francisco in a manner consistent with Shape SSF 2040 would not substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State Scenic Highway.[21]

The General Plan EIR found that there are no officially designated State Scenic Highways that traverse through South San Francisco. I-280, from its intersection with Mission Bay Drive in the city of San Francisco to the South San Francisco and San Bruno border, is eligible for designation as a State Scenic Highway, and the portion of State Route (SR-) 35 (the Junipero Serra Freeway) that borders the western side of South San Francisco is similarly eligible for designation as a State Scenic Highway. Distant views of San Francisco Bay, San Bruno Mountain, and the Coast Range are intermittently visible from I-280 and SR-35, but most of these views are shielded by topography and trees. Accordingly, impacts related to scenic resources within a State Scenic Highway were found to be less than significant.

PROJECT ANALYSIS

The Project site is not visible from I-280 or SR-35, and its construction would be generally consistent with the existing built environment in the Project area. As such, the proposed Project would not damage scenic resources within a designated State Scenic Highway. **(No Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would have no impact on scenic resources within a designated state scenic highway (CEQA Checklist Question 5.I.b), and no mitigation is required.

c) Visual Character / Conflicts with Regulations Governing Scenic Quality

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact AES-3) found that future development and land use activities that occur within South San Francisco in a manner consistent with Shape SSF 2040 would generally be located within urbanized areas and would not conflict with applicable zoning and other regulations governing scenic quality.[22]

The General Plan EIR notes that South San Francisco is a highly urbanized city and that future development under the SSF 2040 General Plan would occur primarily within existing developed subareas, including the East of 101, Lindenville, Downtown, and El Camino subareas. While new private and public improvements could affect visual character or scenic quality, all such development would be subject to City planning, zoning, and design standards that regulate building form, landscaping, and compatibility with surrounding neighborhoods.

[21] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact AES-2, p. 3.1-14

[22] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact AES-3, p. 3.1-16

The General Plan EIR explains that subsequent projects would undergo review for consistency with SSF 2040 General Plan policies protecting scenic resources and visual character—such as those requiring architectural transitions near residential areas, promoting compatibility with existing neighborhoods, and ensuring high-quality design (e.g., Policies LU-2.2, LU-4.1, LU-4.5, LU-4.6, and LU-5.2). Additional policies specific to the City's subareas and Parks and Recreation Element further ensure that new development maintains scenic quality and avoids visual degradation of open space areas.

The SSFMC reinforces these protections through regulations governing tree preservation (Chapter 13.30), tree removal permits (Section 13.28.110), landscaping standards, and design review procedures (Chapter 20.480). These regulations help preserve scenic views, maintain neighborhood character, and ensure consistent, visually compatible development.

With these policies and regulations in place, the General Plan EIR concludes that although future development could introduce visual changes, compliance with adopted design standards, zoning requirements, and SSF 2040 General Plan and *City of South San Francisco Climate Action Plan* (2022 SSF CAP)[23] policies would ensure that impacts to scenic quality remain less than significant.

PROJECT ANALYSIS

As shown in Figure 3-1, *Project Site Location and Surrounding Land Uses*, the Project site is located within a fully urbanized area. Therefore, the relevant question is whether the proposed Project would conflict with applicable zoning and other regulations governing scenic quality. The Project site is located within a PR land use designation and zoning district. This land use designation seeks to provide open spaces and recreational facilities for community members to enjoy. The proposed Project would construct a new preschool to replace the existing preschool at the community center and various other park improvements, as described in the Project Description. The new preschool would be consistent with the existing use of the Project site and subject to the design standards identified in the SSFMC, which would be enforced through the design review process described above, and therefore would be consistent with the visual character of the surrounding area. The various park improvements would replace outdated facilities with new ones designed in accordance with the design standards, thus improving the visual character of the park.

As demonstrated in the SSF 2040 General Plan and zoning consistency analysis in this CEQA Checklist, the proposed Project has been designed to comply with all applicable City architectural guidelines, design review criteria, development standards, and landscaping requirements that protect and promote aesthetic quality. The proposed Project would be subject to the City's established design review process (SSFMC Chapter 20.480), which ensures that new development is compatible with surrounding uses, preserves neighborhood character, and adheres to objective design standards adopted to maintain visual quality. Because the proposed Project is consistent with these requirements and would undergo the same regulatory review assumed in the General Plan EIR, the proposed Project would be consistent with the General Plan EIR's conclusions regarding scenic quality, and impacts related to regulations governing scenic quality would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project's individual buildings, landscape, and lighting will be subject to the City's Design Review process and criteria. These processes and criteria include measures to ensure that the proposed Project's impacts to visual character (CEQA Checklist Question 5.I.c) remain less than significant, and no additional mitigation is required.

[23] City of South San Francisco. 2022a. *City of South San Francisco Climate Action Plan*. Available at: https://shapessf.com/wp-content/uploads/2022/03/SSFCAP_PublicDraft2022_02_Small.pdf. Accessed November 2025.

d) Light and Glare

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR explains that South San Francisco is a fully urbanized community where most new development would occur on parcels that already contain buildings and existing sources of light and glare. While buildout under the SSF 2040 General Plan would introduce additional nighttime lighting and reflective surfaces—such as exterior lighting, illuminated signage, interior lighting visible from outside buildings, and glare from building materials and vehicles—the General Plan EIR found that these increases would be controlled and minimized through compliance with SSF 2040 General Plan policies and SSFMC requirements.

The General Plan EIR highlights several regulatory mechanisms that reduce light and glare impacts. SSF 2040 General Plan policies, including those addressing low-intensity lighting near sensitive habitats, limit the spread of light into environmentally sensitive areas. The Zoning Ordinance includes detailed standards for outdoor lighting (Section 20.300.008), including fixture height limits, shielding requirements, and prohibitions on high-intensity, flashing, or distracting lighting. Standards for sign illumination (Section 20.360.004) further reduce potential glare by prohibiting flashing or highly reflective signage and requiring shielded, downward-directed lighting.

All future development must undergo design review, during which proposed lighting and reflective materials are evaluated to ensure compliance with these regulations. Through this review process, lighting placement, photometric performance, and glare control measures are incorporated into Project designs.

The General Plan EIR concludes that, following implementation of these policies, impacts caused by light and glare will be less than significant.

PROJECT ANALYSIS

The proposed Project would introduce new sources of nighttime lighting associated with outdoor security lighting, pathway and entry lighting, and limited lighting within the preschool play area. All proposed fixtures would be fully shielded, directed downward, and designed to comply with City lighting standards in SSFMC Section 20.300.009 (Lighting and Illumination). Illumination levels would be low, would be contained within the Project site, and would not result in appreciable light spillover onto adjacent residential properties or park areas. Therefore, the proposed Project would not substantially increase ambient nighttime lighting conditions or generate nighttime glare.

The proposed Project may also introduce limited daytime sources of glare, primarily through the addition of building windows and glazed doors. These elements would be subject to the City's design standards and Design Review process, which ensure the appropriate selection of materials and window coatings to prevent excessive reflectivity. Window placement is modest, integrated into a single-story building form, and intended to provide natural daylighting rather than expansive reflective surfaces. As a result, the proposed Project would not create substantial daytime glare or adversely affect daytime views.

The proposed Project would have specific effects associated with demolition and construction activities. These specific impacts would be substantially mitigated through adherence with the SSFMC regulations and General Plan EIR mitigation measures identified below, and the proposed Project would not result in any more significant effects in comparison with the SSF 2040 General Plan.

Consistent with the findings of the General Plan EIR, which determined that compliance with applicable design standards would reduce potential light and glare impacts to less-than-significant levels, the

proposed Project would similarly result in less-than-significant impacts related to day or nighttime light and glare. **(Less than Significant)**

CONCLUSION

As the proposed Project would have a less-than-significant impact on light and glare, it would not have any new specific effects or more significant effects than those identified in the General Plan EIR.

CEQA Conclusion Pertaining to Aesthetics

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant aesthetic impacts identified in that prior Program EIR, nor would it result in new significant impacts related to aesthetics or visual resources that were not previously identified. The General Plan EIR did not identify any mitigation measures related to aesthetics or visual resources that would apply to the proposed Project and none would be required. No further environmental analysis of the proposed Project pertaining to the topics of aesthetics is required.

II. Agriculture and Forestry Resources

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact	■	□	–	No Impact
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	■	□	–	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No Impact	■	□	–	No Impact
d) Result in the loss of forestland or conversion of forestland to non-forest use?	No Impact	■	□	–	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?	No Impact	■	□	–	No Impact

a)–e) Agriculture and Forestry Resources

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR includes an analysis of the potential effects associated with SSF 2040 General Plan buildout on agricultural resources. The General Plan EIR concluded that the General Plan (GP) planning area is located within an urban environment and no existing agriculture or forestry land use activities occur. No portion of the GP planning area is designated as relevant for agriculture or forestry resources by the City or by the State of California. As such, construction and operation pursuant to the SSF 2040 General Plan would not result in the conversion of Prime Farmland or Farmland of Statewide Importance to nonagricultural uses, nor would it conflict with any zoning for agricultural use or a Williamson Act Contract, or any zoning for forestland or timberland and would not result in loss or conversion of forestland to non-forest uses. Therefore, no impacts related to agriculture and forestry resources would occur.[24]

[24] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, *Chapter 6: Effects Found Not To Be Significant*, p. 6.1

PROJECT ANALYSIS

Based on a current search of the California Department of Conservation's Farmland Mapping and Monitoring Program, the Project site does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland,[25] and does not meet the state definition of "forest land." The Project site does not contain active farmlands or grazing lands, is not encumbered by Williamson Act contracts, and is not included within any agricultural or forest resources zoning district. The proposed Project would not convert Important Farmland to non-agricultural use and would not result in loss of an active forest resource.

Consistent with the findings of the SSF 2040 General Plan, the proposed Project would not create pressures to convert farmland or forestland to non-agricultural use. **(No Impact)**

CONCLUSION

The Project site is located within a fully urbanized area of the City of South San Francisco and does not contain farmland, forest land, or other agricultural or forestry resources as defined by the California Department of Conservation or CEQA Guidelines. The Project would not convert Prime Farmland, Farmland of Statewide Importance, Unique Farmland, or forest land to non-agricultural use, nor would it conflict with Williamson Act contracts or agricultural zoning. Consistent with the conclusions of the SSF 2040 General Plan EIR, the Project would not result in impacts to agriculture or forestry resources. Therefore, the Project would have no impact related to agriculture and forestry resources, and no mitigation is required.

CEQA Conclusions Pertaining to Agriculture

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant agricultural or forestland impacts identified in that Program EIR, nor would it result in new significant impacts related to agriculture or forestlands that were not previously identified. The General Plan EIR did not identify any mitigation measures related to agriculture or forestlands that would apply to the proposed Project and none would be required.

[25] California Department of Conservation. 2025. Farmland Mapping and Monitoring Program. Available at: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed October 2025.

III. Air Quality

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Conflict with or obstruct implementation of the applicable air quality plan?	SU	■	□	MM AIR-1a, MM AIR-1b	LTS w/MM
b) During construction, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	LTS w/MM	■	□	MM AIR-1a	LTS w/MM
c) During construction, expose sensitive receptors to substantial pollutant concentrations?	LTS w/MM	■	□	MM AIR-1a, MM AIR-1b	LTS w/MM
d) During operations, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	SU	■	□	--	LTS
e) During operations, expose sensitive receptors to substantial pollutant concentrations?	LTS w/MM	■	□	MM AIR-1b	LTS w/MM
f) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	■	□	–	LTS

Information related to the proposed Project and the Project site in the Air Quality section of this CEQA Checklist has been derived from the *Air Quality and Greenhouse Gas Report for the Westborough Preschool Expansion Project, San Mateo County, California* (attached as checklist Appendix A.[26]

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan mitigation measures that address potential impacts relating to air quality resulting from buildout of the SSF 2040 General Plan. These mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that air quality impacts are avoided, minimized, or reduced to the greatest extent feasible.

[26] SWCA Environmental Consultants (SWCA). 2025. *Air Quality and Greenhouse Gas Report for the Westborough Preschool Expansion Project, San Mateo County, California*. December.

MM AIR-1a: Individual development projects facilitated by the proposed project shall incorporate the following Basic Construction Mitigation Measures recommended by the Bay Area Air Quality Management District (BAAQMD):

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout 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.
- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- 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.
- Idling times shall be minimized either by shutting equipment off when not in use or 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.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- 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.

MM AIR-1b: Projects that may result in additional toxic air contaminants (TACs) that are located within 1,000 feet of a sensitive receptors(s) or would place sensitive receptors within 1,000 feet of uses generating TACs, such as roadways with volumes of 10,000 average annual daily trips or greater, shall implement Bay Area Air Quality Management District (BAAQMD) Guidelines and California Office of Environmental Health Hazard Assessment (OEHHA) policies and procedures requiring a Health Risk Assessments (HRA) for residential development and other sensitive receptors. Screening area distances may be increased on a case-by-case basis if an unusually large source or sources of hazardous emissions are proposed or currently exist. Based on the results of the HRA, identify and implement measures (such as air filtration systems) to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards. Measures identified in HRAs shall be included into the site development plan as a component of a proposed project.

MM TRANS-1: Transportation Demand Management. To reduce Vehicle Miles Traveled (VMT), the City shall implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements. The City shall also update its TDM Ordinance and parking requirements every five to ten years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. The City shall achieve the performance standards outlined in the TDM Ordinance.

The City shall update its TDM Ordinance every 5 to 10 years to limit Total VMT and Work-Based VMT by incentivizing use of transit and active transportation and disincentivizing auto use. The TDM Ordinance shall cover all development projects generating greater than 100 daily trips, with the most stringent requirements for office/Research and Development (R&D) land uses that disproportionately account for the highest rates of VMT in the City. Development projects shall implement a combination of TDM programs, services, and infrastructure improvements, including but not limited to: establishing trip reduction programs; subsidizing transit and active transportation use; coordinating carpooling and vanpooling; encouraging telecommuting and flexible work schedules; designing site plans to prioritize pedestrian, bicycle, and transit travel; funding first/last mile shuttle services; establishing site-specific trip caps; managing parking supply; and constructing transit and active transportation capital improvements. Developments shall be subject to annual monitoring. The City shall establish an administrative fine structure for developments found to be out of compliance and apply any revenues from fines to infrastructure and services aimed at reducing VMT.

The City shall establish an East of 101 Area Trip Cap to support the monitoring of vehicle trip activity and focus efforts to reduce VMT. The area-wide trip cap shall apply to the high density employment uses in the East of 101 Area. The City shall conduct annual traffic counts along the cordon area perimeter. Should the trip cap be reached, the City shall consider corrective actions such as: revising mode share targets for projects subject to the TDM Ordinance, identifying new funding measures for TDM services, implementing new vehicle user charges, creating new street connections, or slowing the pace of development approvals within the cordon zone.

The City shall update its parking requirements every 5 to 10 years to align with its TDM Ordinance and East of 101 Area Trip Cap. The City shall establish parking maximums for office/R&D uses to ensure that VMT reduction goals are incorporated into the design of development projects.

a) Consistency with the Applicable Air Quality Plan

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that implementation of the SSF 2040 General Plan would conflict with or obstruct implementation of the 2017 Clean Air Plan, which is the applicable air quality plan (AQP). According to the Bay Area Air District's guidance, a proposed land use plan would be consistent with the AQP if it would: (1) support the primary goals of the AQP, (2) include applicable control measures from the AQP, (3) not disrupt or hinder implementation of any AQP control measures, and (4) the plan's projected VMT increase must be less than or equal to its projected population growth. The General Plan EIR determined the following as pertaining to consistency with the applicable AQP:

- The SSF 2040 General Plan, Zoning Ordinance amendments, and 2022 SSF CAP support the primary goals of the AQP to attain air quality standards, reduce population exposure and protect public health, and reduce greenhouse gas (GHG) emissions and protect the climate. The SSF 2040 General Plan was found to be consistent with the 2017 Clean Air Plan's primary goal of achieving and maintaining attainment status for ambient air quality standards, as the SSF 2040 General Plan's land use patterns would not be substantially different from existing land use patterns.
- With implementation of General Plan EIR Mitigation Measure (MM) AIR-1a (BAAQMD's Basic Construction Mitigation Measures Recommended for All Proposed Projects), which are recommended by the BAAQMD to ensure construction fugitive dust emissions are less than

significant, impacts pertaining to ambient air quality standards was determined to be less than significant with mitigation.

- With implementation of General Plan EIR MM AIR-1b (BAAQMD Guidelines and California Office of Environmental Health Hazard Assessment [OEHHA] Policies and Procedures requiring a Health Risk Assessment), the SSF 2040 General Plan was found to be consistent with the applicable AQP's primary goal of reducing public health impacts, and this impact was determined to be less than significant with mitigation.
- The SSF 2040 General Plan was found to be consistent with the goals of the 2017 Clean Air Plan to reduce GHG emissions, and accordingly this impact was determined to be less than significant.
- The SSF 2040 General Plan, Zoning Ordinance amendments and 2022 SSF CAP include applicable control measures from the AQP. The 2017 Clean Air Plan contains 55 control measures aimed at reducing air pollution in the Bay Area. These include control measures addressing stationary, area, mobile source, and transportation emissions. They also include control measures designed to protect the climate and promote mixed use, compact development to reduce vehicle emissions and exposure to pollutants from stationary and mobile sources. The General Plan EIR found that the SSF 2040 General Plan, Zoning Ordinance amendments, and 2022 SSF CAP include applicable control measures from the AQP. As such, the General Plan EIR concluded that the SSF 2040 General Plan was consistent with the 2017 Clean Air Plan under this criterion, and this impact was determined to be less than significant.
- The SSF 2040 General Plan, Zoning Ordinance amendments and 2022 SSF CAP would not disrupt or hinder implementation of any AQP Control Measures. The SSF 2040 General Plan and SSFMC incorporate and are consistent with the control measures included in the 2017 Clean Air Plan, and do not include any components that would disrupt or hinder implementation of any control measures, such as precluding an extension of a planned transit line or bike bath or proposing excessive parking. As such, the General Plan EIR determined that the SSF 2040 General Plan would not hinder the BAAQMD from implementing the control measures in the 2017 Clean Air Plan, and this impact was found to be less than significant.
- The SSF 2040 General Plan, Zoning Ordinance amendments, and 2022 SSF CAP would not reduce VMT per capita. One of the criteria for determining consistency with the 2017 Clean Air Plan is comparing the GP Planning Area's VMT growth with population growth. The VMT growth facilitated by the SSF 2040 General Plan was found to constitute an approximately 94 percent growth through 2040, while population growth facilitated by the SSF 2040 General Plan was found to constitute an approximately 61 percent growth through 2040. The forecasted VMT growth was found to outpace the forecasted population growth.

As the plan's projected VMT increase would be greater than its projected population growth, the General Plan EIR concluded that the SSF 2040 General Plan was inconsistent with the 2017 Clean Air Plan, and that this impact was potentially significant. To address these impacts, the General Plan EIR identified MM AIR-1a, MM AIR-1b, and MM TRANS-1; however, the General Plan EIR ultimately determined that that level of significance after mitigation would be significant and unavoidable.

PROJECT ANALYSIS

Determining consistency with the AQP involves assessing whether applicable control measures contained in the AQP are implemented and whether implementation of the proposed Project would disrupt or hinder implementation of AQP control measures. The control measures are organized into five categories: 1) stationary and area source control measures; 2) mobile source measures; 3) transportation control measures; 4) land use and local impact measures; and 5) energy and climate measures. The control

measures are geared toward traditional land uses (e.g., residential, commercial, industrial uses) and buildings.

All control measures contained in the 2017 Clean Air Plan that are applicable to the proposed Project would be implemented. In addition, all projects within the Bay Area Air District's jurisdiction are required to implement the Bay Area Air District standard control measures or BMPs during construction activities. The proposed Project would be subject to General Plan EIR MM AIR-1a, which identifies these BMPs and applies them to all projects within the city. MM TRANS-1 would not apply to the proposed Project, as the Project site is outside of the East of 101 subarea. The proposed Project, which would expand preschool operations and complete various improvements to existing facilities at Westborough Park, does not include any special features that would disrupt or hinder implementation of the AQP's control measures. Therefore, the proposed Project would not obstruct implementation of the AQP.

Furthermore, the air quality thresholds of significance that were adopted by the Bay Area Air District determine compliance with the goals of attainment plans in the region. Projects with emissions and health risks below Bay Area Air District significance thresholds would therefore not conflict with or obstruct implementation of the applicable AQP. The proposed Project's emissions of criteria air pollutants for which the region is in non-attainment status and the health risks were estimated using the current version of the California Emissions Estimator Model (CalEEMod), as required by General Plan EIR MM AIR-1b identified in the General Plan EIR.[27] As shown below under CEQA Checklist Questions III.c and III.e, the estimated emissions and health risks from Project construction and operation would be below Bay Area Air District thresholds of significance. Therefore, the proposed Project would not conflict with implementation of the AQP, and the proposed Project would be consistent with the AQP. **(Less than Significant with Mitigation)**

CONCLUSION

The General Plan EIR determined that the SSF 2040 General Plan would have a significant and unavoidable impact on implementation of the 2017 Clean Air Plan due to criteria air pollutant impacts associated with VMT exceeding population growth in the city as a result of the SSF 2040 General Plan. However, as documented above, the proposed Project would result in a less-than-significant impact with adherence to the mitigation measures identified in the General Plan EIR and would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan. Therefore, no additional environmental review of the proposed Project as it relates to the AQP would be required.

b) Construction-Period Criteria Pollutant Emissions

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR found that future development supported by the SSF 2040 General Plan would result in short-term construction-related criteria pollutant emissions that have the potential to have an adverse effect on air quality. Future development activities would generally entail demolition, site preparation and grading, building construction, paving, and painting.

Fugitive dust emissions would typically be greatest during building demolition, site preparation, and grading due to the disturbance of soil and transport of material. Nitrogen oxide (NO_X) emissions would also result from the combustion of diesel fuels used to power off-road heavy-duty vehicles and equipment (e.g., backhoes, bulldozers, excavators). The type and quantity of equipment, as well as duration of construction activities, would be dependent on Project-specific conditions. Larger projects would require

[27] California Air Pollution Control Officers Association (CAPCOA). 2022. California Emissions Estimator Model (CalEEMod). Version 2022.1.1.29. Available at: https://www.caleemod.com/. Accessed June 2025.

more equipment over a longer timeframe than that required for redevelopment of small residential or mixed-use projects.

The General Plan EIR relies on criteria recommended by the Bay Area Air District for determining the significance of construction-related impacts of criteria air pollutants and ozone precursors and cites the *Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines* (BAAQMD CEQA Guidelines)[28] and its recommended "Basic" measures to control and reduce construction-related emissions. The General Plan EIR determined that consistency with these current Air Quality Control Plan measures would ensure the region's achievement and maintenance of attainment of federal and state ambient air quality standards. The General Plan EIR concluded that construction-period criteria air pollutants would be reduced to a less-than-significant level with implementation of General Plan EIR MM AIR-1a, which contains Bay Area Air District's "Basic Construction Mitigation Measures Recommended for All Proposed Projects" to reduce construction-period fugitive dust emissions.

PROJECT ANALYSIS

Implementation of the proposed Project would generate emissions of criteria air pollutants during construction. The estimated mitigated and unmitigated emissions from Project construction are summarized in Table 5-1, *Project Construction Emissions Summary*. The CalEEMod outputs, which include detailed model assumptions, are provided in Appendix A.

Table 5-1. Project Construction Emissions Summary

Construction Year	Unmitigated Construction Emissions Summary[1]			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Pollutant Emission (pounds per day)				
2026 Average Daily Emission	0.49	1.95	0.77	0.18
2027 Average Daily Emission	0.02	0.17	0.10	0.02
Bay Area Air District Significance Thresholds	*54*	*54*	*82*	*54*
Threshold Exceeded?	*No*	*No*	*No*	*No*
Pollutant Emission (tons per year)				
2026 Maximum Annual	0.09	0.36	0.14	0.03
2027 Maximum Annual	<0.01	0.03	0.02	<0.01
Bay Area Air District Significance Thresholds	*10*	*10*	*15*	*10*
Threshold Exceeded?	*No*	*No*	*No*	*No*

Source: SWCA (2025).

Notes:

[1] Mitigation was not required for the proposed Project's emissions to be below the Bay Area Air District significance thresholds, but modeling of emissions accounted for the BMPs prescribed in General Plan EIR MM AIR-1a.

As Table 5-1 shows, estimated Project construction emissions for all pollutants are below Bay Area Air District significance thresholds. Therefore, Project construction would have a less-than-significant impact and would incorporate General Plan EIR MM AIR-1a. **(Less than Significant with Mitigation)**

[28] Bay Area Air Quality Management District (BAAQMD). 2022. *Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines*. April. Available at: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed November 2025.

CONCLUSION

Consistent with the findings of the General Plan EIR, Project construction would not generate emissions in excess of Bay Area Air District significance thresholds, and would adhere to General Plan EIR MM AIR-1a. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as relates to construction-period criteria air pollutants would be required.

c) Sensitive Receptor Exposure to Toxic Pollutant Concentrations – Construction

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that implementation of the SSF 2040 General Plan could expose sensitive receptors to substantial toxic air pollutant concentrations during construction. The General Plan EIR defined toxic air contaminants (TACs) as airborne pollutants that may pose a present or potential hazard to human health.

The General Plan EIR determined that TACs could be generated during construction activities, but that identification of potential impacts to sensitive receptors resulting from construction-generated TACs would require project-specific information for future individual land use development projects that was not known at the time of preparation of the General Plan EIR. The General Plan EIR includes General Plan EIR MM AIR-1b, which requires future projects that may result in additional TACs and that are located within 1,000 feet of a sensitive receptor to implement BAAQMD CEQA Guidelines and OEHHA policies and procedures requiring a health risk assessment (HRA).

In consideration of policies and actions of the SSF 2040 General Plan and regulations in SSFMC that target various strategies for reducing human health impacts and exposure of sensitive receptors to substantial pollutant concentrations, as well as the implementation of General Plan EIR MM AIR-1b, the General Plan EIR determined that this impact was less than significant with mitigation.

PROJECT ANALYSIS

The primary sources of TAC emissions during construction are diesel emissions from off-road equipment and on-road diesel trucks also known as diesel particulate matter (diesel PM). Diesel exhaust is identified by the State of California as a known carcinogen. Exposure to diesel PM poses an increased health risk because small particles can deposit deeply in the lungs and contain substances that are particularly harmful to human health. Some population groups, such as children, the elderly, and acutely and chronically ill persons, are considered more sensitive to air pollution than others. Prolonged diesel PM exposure to sensitive receptors resulting from construction-generated TACs can cause a wide range of health effects, including aggravating asthma and bronchitis, causing visits to the hospital for respiratory and cardiovascular symptoms, and contributing to heart attacks and deaths. Sensitive receptor locations typically include residential areas, hospitals, eldercare facilities, rehabilitation centers, daycare centers, and parks.

For assessing community risks and hazards, the Bay Area Air District recommends identifying sensitive receptors within a 1,000-foot radius zone of influence around the Project site. The Project site is located adjacent to residences north, east, and south of the Project site. Sensitive receptors on the Project site include the existing community center where children congregate throughout the school day.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of particulate matter 10 microns or less in diameter (PM_{10}) and 2.5 microns or

less in diameter ($PM_{2.5}$). Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the Project site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Guidelines consider these impacts to be less than significant if BMPs are employed to reduce these emissions. As previously discussed, General Plan EIR MM AIR-1a applies these BMPs to all projects within the city, including the proposed Project. Therefore, fugitive dust impacts associated with the proposed Project would be less than significant with mitigation.

Construction equipment and associated heavy-duty truck traffic would also generate diesel exhaust, which is a known TAC. Construction exhaust emissions may pose community risks for sensitive receptors such as nearby residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors.

An HRA was conducted as required by General Plan EIR MM AIR-1b to evaluate potential health effects on sensitive receptors at these nearby residences from construction emissions. Results are presented in an HRA in Appendix A. Emissions and dispersion modeling was conducted to predict the diesel PM concentrations resulting from Project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated at each sensitive receptor. The results of the HRA are summarized below in Table 5-2, *Project and Cumulative Construction Health Risks*.

Table 5-2. Project and Cumulative Construction Health Risks

Emissions Scenario	Receptor	Diesel Particulate Matter		$PM_{2.5}$ Annual Average Concentration ($\mu g/m^3$)
		Cancer Risk (per million)	Chronic Hazard Index	
Project Scenario				
Uncontrolled Off-Road Construction Equipment	MEIR	7.1	0.06	0.06
	Offsite MEIS	1.0	0.02	0.02
Total		8.1	0.08	0.08
Bay Area Air District Thresholds of Significance		*10*	*1.0*	*0.3*
Exceed Threshold?		*No*	*No*	*No*
Cumulative Scenario				
ARCO Facility #83129 (112119-1)	Gasoline Station	1.8	0.18	0.00
Major Roadway (Westborough Boulevard)	Mobile	2.9	0.02	0.14
Total		11.8	0.02	0.2
Bay Area Air District Thresholds of Significance		*100*	*10.0*	*0.8*
Exceed Threshold?		*No*	*No*	*No*

Source: SWCA (2025).

Notes: $\mu g/m^3$ = micrograms per cubic meter; MEIR = Maximally Exposed Individual Resident; MEIS = Maximally Exposed Individual Student

As shown above in Table 5-2, for the Maximally Exposed Individual Resident (MEIR), the excess cancer risk level for unmitigated diesel PM was 7.1 in one million, which would not exceed the 10 in one million TAC Bay Area Air District threshold of significance. The unmitigated annual average $PM_{2.5}$ was 0.06 $\mu g/m^3$, which would not exceed the 0.3 $\mu g/m^3$ annual average $PM_{2.5}$ Bay Area Air District threshold of significance. For the Maximally Exposed Individual Student (MEIS), the average annual concentration for the unmitigated annual average $PM_{2.5}$ was 0.02 $\mu g/m^3$, which does not exceed the 0.3 $\mu g/m^3$ annual

average $PM_{2.5}$ Bay Area Air District threshold of significance, and the excess cancer risk for unmitigated diesel PM was 1.0 in one million, which would not exceed the 10 in one million TAC Bay Area Air District threshold of significance. The proposed Project's construction emissions from particulate exhaust matter, which is used to represent diesel PM, would be less than 1 pound per day and 0.02 ton per year as shown in Table 5-2. Therefore, project-level health risks as a result of Project construction would be less than significant.

The HRA also evaluated cumulative construction health risks. Two cumulative sources of TAC and $PM_{2.5}$ emissions within 1,000 feet of shared sensitive receptors were identified. At the time of preparation of this analysis, there were no reasonably foreseeable future projects identified within 1,000 feet of the Project site that would introduce a new source of TACs and/or $PM_{2.5}$ emissions. As shown in Table 5-2, the cumulative cancer risk, chronic hazard index, and annual average $PM_{2.5}$ concentration at the MEIR would be below Bay Area Air District's cumulative thresholds. Therefore, implementation of the proposed Project would not expose existing sensitive receptors to substantial concentrations of TACs and $PM_{2.5}$ that would be considered cumulatively considerable. **(Less than Significant with Mitigation)**

CONCLUSION

Consistent with the findings of the General Plan EIR, Project construction would not result in Project-level or cumulative-level health risks in excess of Bay Area Air District significance thresholds and would adhere to General Plan EIR MM AIR-1b. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as it relates to construction-period TACs would be required.

d) Operational Period Criteria Pollutant Emissions

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that implementation of the SSF 2040 General Plan would result in a cumulatively considerable net increase of operational criteria air pollutants for which the region is in non-attainment status under applicable federal or state ambient air quality standards.

Long-term criteria pollutant emissions would result from the operation of residential, retail, light industrial, commercial, and institutional uses supported by the SSF 2040 General Plan. Operational air quality emissions are principally generated from area sources, energy, and mobile sources. Area source emissions are the combination of outdoor landscape maintenance equipment, use of consumer products such as cleaning products, use of fireplaces and hearths, and periodic reapplication of architectural coatings. Criteria pollutants generated from energy sources are principally from the on-site use of natural gas. Electricity consumption is not included in direct energy source emissions, as those emissions are generated from operation of an electricity generation facility, which may or may not be within the same air basin and under the same attainment status as the end-user. Mobile source emissions result from the vehicle activity associated with the operation of land use development projects, including worker and patron vehicle trips.

The General Plan EIR requires that future development projects pursuant to the SSF 2040 General Plan be subject to the City's standard CEQA review process, and that project-specific emissions be evaluated in relation to the Bay Area Air District significance thresholds. Although Project-level information was not available when the City prepared the General Plan EIR, the General Plan EIR estimated emissions resulting from future development by utilizing CalEEMod, which provided an estimate of the potential overall area, energy, and mobile source emissions resulting from SSF 2040 General Plan buildout.

The General Plan EIR identified that overall area and energy source emissions would increase from baseline conditions due to the projected increase in residential units and nonresidential space. Conversely, the General Plan EIR found that overall mobile source emissions would decrease from baseline emissions, largely due to improved fuel efficiency standards, the accelerated adoption of electric vehicles (EVs), and fleet turnover requirements implemented at the state level.

Pursuant to Bay Area Air District recommendations, the criteria used for determining the significance of plan-level impacts is to analyze the SSF 2040 General Plan's projected growth in VMT as compared to its projected population growth under existing conditions. If the SSF 2040 General Plan's projected VMT growth outpaces projected population growth, then the SSF 2040 General Plan would result in a cumulatively considerable net increase in criteria pollutants, and this impact would be potentially significant. The General Plan EIR determined that VMT growth facilitated by the SSF 2040 General Plan would constitute an approximately 94% growth in VMT through 2040, while population growth facilitated by the SSF 2040 General Plan would constitute an approximately 61% growth through 2040. Therefore, the forecasted VMT growth was found to outpace the forecasted population growth. As such, the General Plan EIR concluded that this impact would be potentially significant. Although the General Plan EIR found that General Plan EIR MM AIR-1 and MM TRANS-1 would reduce the SSF 2040 General Plan's impacts on criteria air pollutants, no feasible mitigation existed that could increase population projections while keeping VMT growth to an equal or lesser level, and therefore the impact would be significant and unavoidable.

PROJECT ANALYSIS

Project operations would generate volatile organic compound (VOC), NO_X, carbon monoxide (CO), sulfur oxide (SO_X), PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips, and water sources. The estimated emissions from Project operation are summarized in Table 5-3, *Operational Emissions Summary*. Complete details of the emissions calculations are provided in Appendix A.

Table 5-3. Operational Emissions Summary

	Operational Emissions Summary			
Operation Year 2028	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Pollutant Emission (pounds per day)				
Mobile	2.32	1.16	3.30	0.85
Area	0.28	0.003	<0.01	<0.01
Energy	0.01	0.10	0.01	0.01
Water	0	0	0	0
Waste	0	0	0	0
Refrigeration	0	0	0	0
Total	**2.61**	**1.26**	**3.31**	**0.86**
Bay Area Air District Significance Thresholds	*54*	*54*	*82*	*54*
Threshold Exceeded?	*No*	*No*	*No*	*No*
Pollutant Emission (tons per year)				
Mobile	0.31	0.18	0.46	0.12
Area	0.04	<0.01	<0.01	<0.01
Energy	<0.01	0.01	<0.01	<0.01

Operation Year 2028	Operational Emissions Summary			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Water	0	0	0	0
Waste	0	0	0	0
Refrigeration	0	0	0	0
Total	**0.35**	**0.20**	**0.46**	**0.12**
Bay Area Air District Significance Thresholds	*10*	*10*	*15*	*10*
Threshold Exceeded?	*No*	*No*	*No*	*No*

As Table 5-3 shows, estimated Project operation emissions for all pollutants are below Bay Area Air District significance thresholds. Therefore, Project operation would have a less-than-significant impact. **(Less than Significant)**

CONCLUSION

The General Plan EIR determined that the SSF 2040 General Plan would have a significant and unavoidable impact related to operational criteria air pollutants due to VMT exceeding population growth in the city as a result of the SSF 2040 General Plan. However, as documented above, the proposed Project would result in a less-than-significant impact and would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan. Therefore, no additional environmental review of the proposed Project as it relates to operational criteria air pollutants would be required.

e) Operational Period Toxic Pollutant Concentrations

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that implementation of the SSF 2040 General Plan would not expose sensitive receptors to substantial pollutant concentrations. Localized risks associated with pollutant concentrations are primarily related to exposure to TAC emissions. TACs are a defined set of airborne pollutants that may pose a present or potential hazard to human health. Common sources of TAC emissions are stationary sources (e.g., diesel backup generators), which are subject to Bay Area Air District permit requirements. Although the SSF 2040 General Plan does not include specific plans for any new, large, stationary sources of emissions, such sources could be developed near sensitive receptors.

The General Plan EIR included MM AIR-1b, which requires future projects that may result in additional TACs and are located within 1,000 feet of a sensitive receptor to implement BAAQMD CEQA Guidelines and OEHHA policies and procedures requiring an HRA to demonstrate that future development would result in less than significant impacts to sensitive receptors. SSFMC Section 20.300.010 (Performance Standards) also establishes regulations related to air contaminants, requiring that new sources of air pollution comply with rules identified by the U.S. Environmental Protection Agency (USEPA), California Air Resources Board (CARB), and Bay Area Air District. The section further requires that operators of activities, processes, or uses that require an “approval to operate” permit from the Bay Area Air District to file a copy of that permit with the City Planning Division. Considering the policies and actions of the SSF 2040 General Plan and regulations in the SSFMC that target various strategies for reducing human health impacts and reducing exposure of sensitive receptors to substantial pollutant concentrations, as well as the implementation of General Plan EIR MM AIR-1b, the General Plan EIR found this impact to be less than significant with mitigation.

PROJECT ANALYSIS

Project operation would not generate any localized emissions that could expose sensitive receptors to unhealthy air pollutant levels, because no stationary sources of TACs, such as generators, are proposed as part of the proposed Project and none of the improvements would increase current operational emissions. Further, as previously mentioned, an HRA was prepared for the Project as required by General Plan EIR MM AIR-1b. As documented in Appendix A emissions from particulate exhaust matter associated with project-generated vehicle trips would be less than 0.05 pound per day and 0.01 ton per year, well below the Bay Area Air District thresholds identified in Tables 5-1 and 5-3. Therefore, Project operation would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant with Mitigation)**

CONCLUSION

Consistent with the findings of the General Plan EIR, Project operation would not result in Project-level or cumulative-level health risks in excess of Bay Area Air District significance thresholds and would adhere to General Plan EIR MM AIR-1b. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as it relates to operational-period TACs would be required.

f) Odors

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that implementation of the SSF 2040 General Plan would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. According to the BAAQMD CEQA Guidelines, land uses associated with odor complaints typically include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations such as chemical and other manufacturing. While odors do not present a health risk themselves, they are often considered a nuisance by people who live, work, or otherwise are located near outdoor odor sources. The BAAQMD CEQA Guidelines identify a screening distance for 1 and 2 miles for the most common odor-generating land uses. Projects located outside of these screening distances would be presumed to not be exposed to odors, while projects within these screening distances present a potential to be exposed to odors. Bay Area Air District Regulation 7 limits emissions of odorous substances within the San Francisco Bay Area Air Basin and would apply to any new odor source. The General Plan EIR found that compliance with the applicable regulations in the SSFMC and applicable Bay Area Air District rules and regulations would minimize odor emissions from adversely affecting a substantial number of people within the city, and odor impacts were found to be less than significant.

PROJECT ANALYSIS

The proposed Project would not be a source of any odors during operations. During construction, a limited number of diesel engines would be operated on the Project site for limited durations. Diesel exhaust and VOCs from these diesel engines would be emitted during Project construction, which are objectionable to some; however, the duration of construction activities is expected to last approximately 12 months, emissions would disperse rapidly from the Project site, and diesel exhaust odors would be consistent with existing vehicle odors in the area. Considering this information, construction and Project operation would not create other emissions or odors adversely affecting a substantial number of people. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not result in other emissions, including odors, that would adversely affect a significant number of people. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as it relates to odors and other emissions would be required.

CEQA Conclusion Pertaining to Air Quality

Based on the analysis, findings, and conclusions of the General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant air quality impacts as identified in that Program EIR, nor would it result in new significant air quality impacts that were not previously identified. The General Plan EIR identified two mitigation measures that are applicable to the proposed Project (MM AIR-1a and MM AIR-1b) and sufficient to ensure that the proposed Project's impacts would be equal or lesser to those identified for the SSF 2040 General Plan. Accordingly, no additional environmental review of the proposed Project as it relates to air quality would be required.

IV. Biological Resources

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	LTS w/MM	■	□	MM BIO-1, MM BIO-1A, MM BIO-1B	LTS w/MM
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service?	LTS	■	□	–	LTS
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	LTS w/MM	■	□	–	No Impact
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	LTS w/MM	■	□	–	LTS w/MM
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	LTS	■	□	SSFMC 13.28 SSFMC 13.30	LTS
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	LTS	■	□	-	No Impact

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to biological resources resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to biological resources are avoided, minimized, or reduced to a less-than-significant level.

MM BIO-1: Special-status Species, Migratory Birds, and Nesting Birds. Special-status species are those listed as Endangered, Threatened or Rare, or as Candidates for listing by the United States Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW), or as Rare Plant Rank 1B or 2B species by the California Native Plant Society (CNPS). This designation also includes CDFW Species of Special Concern and Fully Protected Species. Applicants or sponsors of projects on sites where potential special-status species, migratory birds, or nesting birds are present shall retain a qualified Biologist to conduct a focused survey per applicable regulatory agency protocols to determine whether such species occur on a given project site. The project applicant or sponsor shall ensure that, if development of occupied habitat must occur, species impacts shall be avoided or minimized, and if required by a regulatory agency or the CEQA process, loss of wildlife habitat or individual plants shall be fully compensated on the site. If off-site mitigation is necessary, it shall occur within the South San Francisco Planning Area whenever possible, with a priority given to existing habitat mitigation banks. Habitat mitigation shall be accompanied by a long-term management plan and monitoring program prepared by a qualified Biologist, and include provisions for protection of mitigation lands in perpetuity through the establishment of easements and adequate funding for maintenance and monitoring.

MM BIO-3: Assess Potential Wetland Impacts. Applicants or sponsors of projects on sites where potential jurisdictional wetlands or waterways are present shall retain a qualified Biologist/wetland regulatory specialist to conduct a site investigation and assess whether wetland or waterway features are jurisdictional with regard to the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or California Department of Fish and Wildlife (CDFW). This investigation shall include assessing potential impacts to wetlands and other waters of the United States and/or State. If a feature is found to be jurisdictional or potentially jurisdictional, the project applicant or sponsor shall comply with the appropriate permitting process with each agency claiming jurisdiction prior to disturbance of the feature, and a qualified Biologist/wetland regulatory specialist shall conduct a detailed wetland delineation if necessary.

SSFMC Section 13.28: Street Trees. If any proposed construction, improvement, demolition, or any other work on or adjacent to public property requires removal of a tree planted on the public property, the person undertaking the work shall apply for a permit to remove the tree. The permit may be issued on condition that the applicant replaces the tree with one of the same size and species.

SSFMC Section 13.30: Tree Preservation. The removal or pruning of protected trees without a permit is prohibited.

1. A “protected tree” is defined as: a) any upright, single-trunked tree of a species not considered to be a heritage tree, with a circumference of 48 inches diameter at breast height (dbh); any upright, single-trunked tree of the following species: blue gum, black acacia, myoporum, sweetgum, glossy privet or Lombardy poplar with a circumference of 75 inches dbh; or any upright, single-trunked tree considered to be a heritage tree species, with a circumference of 30 inches or more when measured at 54 inches dbh. A heritage tree means any of the following: California bay, oak, cedar, California buckeye, Catalina ironwood, strawberry tree, mayten, or little gem dwarf southern magnolia.
2. Pursuant to any such permit, replacement trees will be determined as set forth in SSFMC Section 13.30.080 (Replacement of Protected Trees). Replacement of a protected tree can be waived by the director if a sufficient number of trees exist on the property to meet all other requirements of the tree preservation ordinance. Replacement shall be three 15-gallon-size or two 24-inch-box-minimum-size landscape trees. If replacement trees cannot be planted on the property, payment of the replacement value of the tree will be made to the city.

a) Candidate, Sensitive or Special Status Species

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact BIO-1) determined that implementation of the SSF 2040 General Plan could have a substantial adverse effect, either directly or through habitat modifications, on species identified as candidate, sensitive, or special-status species in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife (CDFW) or U.S. Fish and Wildlife Service (USFWS).[29]

As cited in the SSF 2040 General Plan, 48 special-status plant species and 51 special-status animal species were recorded to occur within 5 miles or less of the South San Francisco Planning Area. These sensitive plant species are most likely to be found in the estuary habitats around San Francisco Bay and San Bruno Mountain State Park. The special-status wildlife species are most likely to be found in open space areas of the city, in the surrounding hillsides, and shorebirds and aquatic species can be found along the eastern edge of the city in the estuaries surrounding San Francisco Bay. A few of these wildlife species, such as birds and bats, may find suitable nesting habitat within buildings and other human-made structures. Those species most adapted to human-made habitats include the Alameda song sparrow, American peregrine falcon, and Townsend's big-eared bat.

Development pursuant to the SSF 2040 General Plan would result in additional residential and nonresidential development, but because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses, with the majority of potential growth occurring within the East of 101, Lindenville, Downtown, and El Camino subareas. However, other projects may occur on private and public lands throughout the city where there is the potential for environmental effects related to biological resources. Therefore, subsequent development pursuant to the SSF 2040 General Plan could result in the direct/indirect loss or indirect disturbance of special-status plant or animal species or their habitats.

Future development pursuant to the SSF 2040 General Plan would be required to comply with the various federal and state laws and regulations that protect special-status plant and animal species, including the federal Endangered Species Act (ESA) and California ESA, as well as requirements of the South San Francisco Zoning Ordinance, and SSF 2040 General Plan policies and actions related to biological resources. To further enhance and ensure protection of threatened and endangered species, and to protect nesting and migratory birds, the General Plan EIR includes MM BIO-1, which requires that focused surveys be conducted by any project applicant or sponsor to determine whether special-status species, nesting birds or migratory birds occur on a given project site, that potential impacts to special-status species be avoided and minimized, and that any losses be fully compensated on-site or at a habitat mitigation bank. Implementation of these requirements will result in avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, requiring surveys, and emphasizing avoidance, minimization, and mitigation of impacts to habitats.

Therefore, with mandatory regulatory compliance and implementation of General Plan EIR MM BIO-1, the General Plan EIR concluded that future development projects would not result in significant adverse effects to biological resources, and such impacts were concluded to be less than significant with mitigation.

[29] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact BIO-1, p. 3.3-18

PROJECT ANALYSIS

General Plan EIR Exhibit 3.3-1 does not show the Project site as being within an identified habitat type and is not an ecologically sensitive area.

The Project site is more than 2 miles from sensitive species that may be associated with estuary habitats around San Francisco Bay, and where shorebirds and aquatic species can be found. Additionally, the Project site is also more than 2 miles removed from San Bruno Mountain State Park and surrounding hillsides, where critical sensitive plant habitat and special-status wildlife species are most likely to be found.

The Project site consists of a park, recreational facilities, and landscaped vegetation that includes paved roads, buildings, parking lots, paved walkways, and ornamental and landscaped areas. The habitat suitability for rare or native vegetation in these areas is very low to absent. Similarly, developed habitats that exist at the Project site primarily support common, urban-adapted wildlife species, and overall wildlife abundance and diversity are low. However, existing shrubs and trees may offer sufficient cover for nesting birds.

To avoid potential impacts to nesting birds, all Project activities would comply with applicable federal and state regulatory requirements, including the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code Sections 3503 and 3503.5. Construction activities would occur outside the general nesting season (February 1–August 31) where feasible, or a qualified biologist would conduct preconstruction nesting bird surveys and establish appropriate no-disturbance buffers if active nests are found. With adherence to these standard regulatory requirements and implementation of avoidance and minimization measures, potential impacts on nesting birds would be avoided or reduced to a less-than-significant level. **(Less than Significant with Mitigation)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project would be required to implement existing regulatory requirements of the MBTA and/or the California Fish and Game Code pursuant to General Plan EIR MM BIO-1. These measures provide for protection of active nests of migratory and other birds and bats, including their roosts, eggs, and young. Implementation of these measures would avoid and/or reduce impacts to sensitive status species (CEQA Checklist Question 5.IV.a) to a less-than-significant level.

b) Riparian Habitat or Other Sensitive Natural Community

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact BIO-2) determined that buildout of the SSF 2040 General Plan would not have a substantial adverse effect on any riparian habitat or other sensitive natural community as identified in local or regional plans, policies and regulations, or as identified by the CDFW or USFWS.[30]

Future development pursuant to the SSF 2040 General Plan would be required to comply with adopted federal, state, and local regulations for the protection of riparian habitat and other sensitive natural communities. In addition, future projects would comply with requirements of SSF 2040 General Plan policies and actions and the SSF Zoning Ordinance related to the protection of biological resources. Implementation of these policies, actions, and requirements would reduce potential impacts to below a level of significance. Therefore, the General Plan EIR concluded that future development pursuant to the

[30] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact BIO-1, p. 3.3-22

SSF 2040 General Plan would not result in significant adverse effects to riparian habitat or other sensitive natural communities.

PROJECT ANALYSIS

The Project site is predominantly developed and landscaped, consisting of a maintenance building, paved surfaces, parking areas, and ornamental landscaping. The proposed Project would include the demolition of existing developed features associated with the current maintenance building and replacing them with new preschool buildings, upgraded outdoor play areas, and associated site improvements. All proposed improvements would occur within areas that are already developed or landscaped. The proposed Project would include the removal of six existing trees to accommodate new structures and site reconfiguration; however, 16 replacement trees would be planted as part of the landscape improvement plan.

No riparian habitat or other sensitive natural communities are present on the Project site. The nearest sensitive natural community is associated with Colma Creek, located approximately 1.5 miles east of the Project site. Because all construction and operational activities would be confined to the existing developed footprint and would not involve work within or adjacent to Colma Creek or its drainage area, the proposed Project would not affect this sensitive natural community.

Potential removal of landscaped vegetation and trees could result in the temporary loss of nesting bird habitat; however, as discussed in the nesting bird analysis, compliance with applicable regulatory requirements would ensure that such impacts would be avoided or minimized. Therefore, impacts to sensitive natural communities and nesting habitat would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project will have less-than-significant impacts on riparian habitat or other sensitive natural community types (CEQA Checklist Question 5.IV.b).

c) Wetlands

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact BIO-3) determined that implementation of the SSF 2040 General Plan could have a substantial adverse effect on federally and state protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means.[31]

Estuarine and marine wetlands line the city's coastline and parts of Colma and San Bruno Creeks, and a navigable slough is located south of Colma Creek in the southeastern portion of the city. Subsequent development pursuant to the SSF 2040 General Plan, primarily adjacent to the San Francisco Bay, could result in direct or indirect effects on estuarine habitat and other sensitive marine communities. To ensure protection of wetlands and waters of the United States and/or the state, the General Plan EIR includes MM BIO-3, which requires that a qualified biologist/wetland regulatory specialist conduct a site investigation and assessment for those projects located on sites where potential jurisdictional wetlands or waterways are present. MM BIO-3 further requires that if a feature is found to be jurisdictional or potentially jurisdictional, that the applicant complies with the appropriate permitting process of the respective agency's jurisdiction prior to disturbance of the feature.

[31] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact BIO-3, p. 3.3-23

The General Plan EIR concluded that, with mandatory regulatory compliance and implementation of General Plan EIR MM BIO-3, future development projects would not result in significant adverse effects to federally protected wetlands, waters of the United States, or waters of the state, and impacts would be considered less than significant with mitigation.

PROJECT ANALYSIS

The Project site does not contain any natural watercourses or manmade drainage ditches, and there is no indication of wetlands or water features on the Project site. The majority of the Project site has been previously covered with urban industrial development, paving, and was graded for recreational facilities and features. No potential jurisdictional wetlands or waters occur on the Project site; therefore, the proposed Project would pose no impact. **(No Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not have a substantial adverse effect on federally or state-protected wetlands or waters of the United States or the state (CEQA Checklist Question 5.IV.c), and no mitigation is required.

d) Wildlife Corridors or Native Wildlife Nursery Sites

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact BIO-4) determined that implementation of the SSF 2040 General Plan could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors and could impede the use of wildlife nursery sites. The San Francisco Bay provides essential natural resources for migratory birds on the Pacific Flyway, pockets of parks and open space within the city provide space for wildlife, and Colma Creek, San Bruno Creek, and Navigable Slough of San Bruno Creek provide connections between these open areas. The city's urban forest canopy can also support the movement of a variety of migratory bird species, while creeks and drainages typically serve as movement corridors for wildlife.[32]

As described in the General Plan EIR, future development pursuant to the SSF 2040 General Plan would be required to comply with adopted federal, state, and local regulations for the protection of biological resources. Future projects must also comply with requirements of the SSFMC and Zoning Ordinance and SSF 2040 General Plan policies related to biological resources. General Plan EIR MM BIO-1 requires that focused surveys be conducted to determine whether special-status species, nesting birds, or migratory birds occur on a given project site, and that potential impacts to special-status species be avoided and minimized. MM BIO-3 requires site investigations and assessments for projects on sites where potential jurisdictional wetlands or waterways are present and compliance with the appropriate permitting process. The General Plan EIR concludes that, following implementation of these policies, impacts to wildlife corridors or native wildlife nursery sites will be less than significant.

PROJECT ANALYSIS

According to Exhibit 3.3-3 of the General Plan EIR showing Potential Connectivity for Wildlife Species, the Project site is identified as "tree-covered areas" that may provide wildlife connections between other open areas of the city. The Project site does not include any waterways, ridgelines, or creek corridors, and the Project site, which contains built and paved environment, would not serve as a migration corridor and

[32] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact BIO-4, p. 3.3-26

General Plan EIR MM BIO-1 would require that surveys be completed prior to construction to rule out any presence of nesting or migratory species. Additionally, after six trees are removed for construction, 16 trees would be planted to maintain the Project site's status as a tree-covered area. As such, the proposed Project would have a less-than-significant impact with mitigation incorporated. **(Less than Significant with Mitigation)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would have a less-than-significant effect on wildlife corridors or wildlife nursery sites (CEQA Checklist Question 5.IV.d).

e) Local Policies or Ordinances Protecting Biological Resources

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact BIO-5) determined that implementation of the SSF 2040 General Plan would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. As cited in the General Plan EIR, SSFMC Chapter 13.28 establishes the City's Street Tree Preservation regulations pertaining to trees located on City property. SSFMC Chapter 13.30 (Tree Preservation) establishes the standards and requirements for the protection of certain large trees and trees with unique characteristics, provides standards and requirements for planting and maintenance of trees for new development, and establishes recommended standards for planting and maintaining trees on property that is already developed.[33]

Future development pursuant to the SSF 2040 General Plan would be subject to these mandatory tree preservation requirements and would therefore not conflict with local policies or ordinances protecting biological resources. The General Plan EIR concludes that, following implementation of these policies, impacts to biological resources will be less than significant.

PROJECT ANALYSIS

The proposed Project includes the removal of six trees, including one protected Monterey cypress tree, and planting of approximately 16 trees, including eight California buckeye, two autumn gold maidenhair, two crape myrtle, and four Catalina ironwood trees along with low-water shrubs, perennials, and grasses. As identified under Section 3.4, *Required Discretionary Approvals*, the proposed Project would obtain a Tree Removal Permit, and the proposed planting plan would satisfy the replacement tree requirements of the SSFMC. Therefore, the proposed Project would have a less-than-significant impact. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to obtain a Tree Removal permit for removal of any tree on public property, and for the removal of protected trees on the Project site. The Tree Removal Permit would achieve compliance with local policies or ordinances protecting biological resources and minimize impacts related to potential conflicts with local policies or ordinances protecting biological resources to a level of less than significant, and no mitigation is required (CEQA Checklist Question 5.IV.e).

[33] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact BIO-5, p. 3.3-27

f) Conflict with a Habitat Conservation Plan or Natural Community Conservation Plans

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR that new development pursuant to the SSF 2040 General Plan would not conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan, or other approved local, regional, or state HCP.[34]

South San Francisco contains two areas set aside as habitat for the conservation of threatened and endangered species—Sign Hill Park and San Bruno Mountain State Park, the latter of which is governed by the San Bruno Mountain HCP and the San Bruno Mountain Habitat Management Plan (HMP). The San Francisco Bay Conservation and Development Commission (BCDC) has jurisdiction over all areas of San Francisco Bay that are subject to tidal action and over an area 100 feet wide inland and parallel to the shoreline. Any subsequent development pursuant to the SSF 2040 General Plan that is within or adjacent to Sign Hill Park, within San Bruno Mountain State Park, or adjacent to the San Francisco Bay would require a site-specific assessment of biological resources, and the City's environmental review process would be utilized to impose appropriate mitigation measures. Future projects that border San Francisco Bay and lie within BCDC jurisdiction may require a permit and must comply with the requirements of the McAteer-Petris Act and the San Francisco Bay Plan. Therefore, The General Plan EIR concluded that potential conflicts San Bruno Mountain HCP, San Bruno Mountain HMP, and San Francisco Bay Plan would be reduced to less-than-significant levels. There are no other local, regional, or state HCPs that are applicable to South San Francisco. As such, implementation of the SSF 2040 General Plan was found to not conflict with the provisions of an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state HCP.

PROJECT ANALYSIS

The Project site is not located within or adjacent to Sign Hill Park (approximately 1.0 mile northwest), San Bruno Mountain State Park (roughly 2.5 miles south-southwest), or the shoreline of the San Francisco Bay (approximately 1.3 miles east). Therefore, the proposed Project would not conflict with any adopted plan for the protection of those natural communities, and the proposed Project will have no impacts. **(No Impact)**

CONCLUSION

Consistent with the findings of the SSF 2040 General Plan, the proposed Project would not conflict with an adopted HCP or Natural Community Conservation Plan (CEQA Checklist Question 5.IV.f), and no mitigation is required.

CEQA Conclusion Pertaining to Biological Resources

Based on the analysis, findings, and conclusions of the General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts to biological resources as identified in that Program EIR, nor would it result in new significant impacts related to biological resources that were not previously identified. The General Plan EIR did identify mitigation measures as regulatory requirements related to biological resources that would apply to the proposed Project and have been incorporated into the Project design, and implementation of those mitigation measures and regulatory requirements would ensure the proposed Project's impacts to biological resources would

[34] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact BIO-6, p. 3.3-28

remain less than significant. No further environmental review of the proposed Project pertaining to the topics of biological resources is required.

V. Cultural Resources

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Regulations	Resulting Level of Significance
a) Cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5?	LTS	■	□	–	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	LTS	■	□	CEQA 15064.5(c)	LTS
c) Disturb any human remains, including those interred outside of formal cemeteries?	LTS	■	□	California Health and Safety Code 7050.5 PRC 5097.98	LTS

Information related to the Project and the Project site in the Tribal Cultural Resources section of this CEQA Checklist has been derived from the *Cultural Resources Technical Report for the Westborough Preschool Expansion Project, South San Francisco San Mateo County, California* (Cultural Resources Technical Report) (Appendix C).[35]

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to cultural resources resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to cultural resources are avoided, minimized, or reduced to a less-than-significant level.

State CEQA Guidelines Section 15064.5(c): Inadvertent Discovery of Archaeological Resources. If archaeological materials (e.g., flaked stone tools, midden deposits, fire-affected rock, historic refuse, or structural remains) are encountered during ground-disturbing activities, all work within 50 feet of the discovery shall be halted and the City shall be notified immediately. A qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards shall evaluate the find and determine whether it meets the criteria for a historical resource or unique archaeological resource under State CEQA Guidelines Section 15064.5 and PRC Section 21083.2. If the resource is determined to be significant, the archaeologist shall prepare and implement an appropriate treatment plan, which may include preservation in place, capping, or controlled archaeological data recovery. Construction may resume only after the resource is stabilized or treated in accordance with the approved plan.

California Health and Safety Code Section 7050.5 and PRC Section 5097.98: Discovery of Human Remains. In accordance with California Health and Safety Code and SSF 2040 General Plan policy, if construction or grading activities result in the discovery of human remains, then all work within 100 feet

[35] SWCA Environmental Consultants (SWCA). 2025. *Cultural Resources Technical Report for the Westborough Preschool Expansion Project, South San Francisco San Mateo County, California.* Prepared for the City of South San Francisco. December.

of the discovery shall cease, the County of San Mateo (County) Coroner shall be notified by the Project applicant, and appropriate action shall be taken by the Project applicant in coordination with the Native American Heritage Commission (NAHC), in accordance with California Health and Safety Code 7050.5, or, if the remains are Native American, PRC Section 5097.98 (see further discussion of tribal cultural resources in the Section 5.XVII, *Tribal Cultural Resources*, of this CEQA Checklist).

a) Historic Resource

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact CUL-1) determined that implementation of the SSF 2040 General Plan would not cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5.[36] SSF 2040 General Plan Appendix D identifies those properties considered historic or potentially historic resources, which include:

- Two National Register of Historic Places (NRHP)-listed properties are located within South San Francisco: the Martin Building, located at 265 Grand Avenue (also known as the Metropolitan Hotel), and the South San Francisco Hillside Sign. These two properties are also the only resources listed on the California Register of Historical Resources (CRHR).
- The City recognizes 40 designated Historic Landmarks that are considered cultural resources under CEQA.
- One historic district is situated within South San Francisco: the Grand Avenue Commercial Historic District
- Four potential historic resources are situated within South San Francisco: residential properties (located along Baden, Pine, and Miller Avenues) and the South San Francisco/San Bruno Water Quality Control Plant.
- Historic-era buildings and structures, typically over 50 years in age, may be considered eligible for inclusion on the NRHP and CRHR. Those found eligible by survey or evaluation are considered historic resources under CEQA. Approximately 250 eligible historic architectural resources are located within South San Francisco, the majority of which are not included within the City's register, and include residential homes, commercial buildings, medical facilities, fraternal organizations, civic, educational, religious, and transportation infrastructure.
- Evaluated resources determined to be ineligible for listing have been excluded. [37]

The SSF 2040 General Plan policies and actions specifically address the conservation and protection of historical resources, and the SSFMC contains rules and regulations that protect historical resources. As the City receives development applications for subsequent development projects, those applications will be reviewed by the City for compliance with these policies regulations. Individual development projects that propose to alter a building or structure greater than 45 years of age at the time an application is deemed complete would be required to undergo project-specific environmental review to determine whether the building or structure may be a historic resource and take appropriate action such as requiring additional site-specific or Project-specific measures to reduce any potential impacts. Therefore, future development pursuant to the SSF 2040 General Plan was determined to not result in significant adverse effects to historical resources.

[36] City of South San Francisco, *General Plan Draft EIR*, 2022, Impact CUL-1, p. 3.4-32

[37] City of South San Francisco, *General Plan EIR Appendix D: Cultural Resources-Tribal Cultural Resources Supporting Information*, 2022

PROJECT ANALYSIS

The Cultural Resources Technical Report[38] included a comprehensive records search through the California Historical Resources Information System (CHRIS) Northwest Information Center (NWIC) and a review of the California Historical Resources Inventory, NRHP, CRHR, California Points of Historical Interest, California Historical Landmarks, and local inventories maintained by the City.

The records search found no previously recorded historical resources within the Project site. The closest previously recorded built environment resource is located more than 0.5 mile away and is unrelated to the Project site or its history. The Project site is currently occupied by Westborough Park, a community facility, landscaped areas, and a maintenance building constructed in the 1970s and contains no buildings, structures, or features identified or evaluated as eligible for listing in the NRHP, CRHR, or local registers under any criteria.

A field survey conducted on October 29, 2025, confirmed the absence of resources that appear to be 45 years of age or older and possess potential historical significance. The existing maintenance building is contemporary, exhibits no unique architectural characteristics, and does not appear to represent a significant event, person, or period in time. The surrounding park amenities (basketball courts, tennis courts, lawns, picnic areas, etc) are modern and have no known historical context.

Because the proposed Project would not demolish, alter, or otherwise affect any building, structure, object, historic district, or significant landscape with potential historical value, there is no possibility of a substantial adverse change in the significance of a historical resource, and the proposed Project would have no impact. **(No Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the Project would not cause a substantial adverse change in the significance of a historic resource (CEQA Checklist Question 5.V.a), and no mitigation is required.

b) Archaeological Resources

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact CUL-2) determined that implementation of the SSF 2040 General Plan would not cause a substantial adverse change in the significance of an archaeological resource. Based on information available at the NWIC, there are known archaeological resource sites located within South San Francisco such as at Terrabay and El Camino Real. Additionally, the potential for archaeological sites to be present within the city varies by location, and undiscovered archaeological sites could exist on the Project site. The waterfront and the areas around Colma and San Bruno Creeks have the greatest potential for buried prehistoric archaeological resources to be present.

The General Plan EIR concluded that new development could affect known or previously unidentified archaeological resources. However, the General Plan EIR also determined that compliance with SSF 2040 General Plan Policies ES-10.1 through ES-10.5, which require identification, evaluation, avoidance, and treatment of archaeological and tribal cultural resources and establish procedures for unanticipated discoveries, would ensure that archaeological resources receive appropriate protection. These policies,

[38] SWCA Environmental Consultants (SWCA), *Cultural Resources Technical Report for the Westborough Preschool Expansion Project, South San Francisco San Mateo County, California*, 2025.

together with the City's Zoning Ordinance and Project-level review requirements, were found to provide adequate safeguards to prevent substantial adverse changes to archaeological resources.

PROJECT ANALYSIS

A CHRIS records search conducted by the NWIC for the proposed Project, as reported in the CRTR prepared for the proposed Project,[39] identified no previously recorded archaeological resources within the Project site or a 0.5-mile radius. No known prehistoric or historic archaeological sites, cultural deposits, or isolated artifacts have been documented in or are adjacent to Westborough Park.

The Project site is located on a previously graded, developed parcel supporting existing park facilities, a community center, paved walkways, and a maintenance building. Ground surfaces have been previously disturbed by grading associated with original park development, trenching for prior utility installation, landscaping activities, and the construction of the existing buildings and paved areas.

Due to this prior disturbance, the CRTR determined that the Project site has very low archaeological sensitivity for intact subsurface cultural deposits.

The site is situated on Quaternary artificial fill over younger alluvium, which commonly exhibits low archaeological integrity where prior construction and fill activities have occurred. No natural landforms or features typically associated with prehistoric features are present.

A pedestrian survey conducted on October 29, 2025, identified no archaeological materials, cultural features, or indications of subsurface archaeological features.

Potential for Impact

The likelihood of encountering intact or significant archaeological resources is low because:

- no archaeological resources are known within the Project site,
- the Project site has been substantially disturbed,
- archaeological sensitivity is low, and
- the Project design does not include deep foundation systems or substantial excavation beyond typical trenching for utilities.

However, CEQA requires a finding of significance if an archaeological resource is inadvertently discovered and would be damaged by the proposed Project (State CEQA Guidelines 15064.5(c)).

Standard Inadvertent Discovery Procedures

In the event that unanticipated cultural resources are exposed during ground-disturbing activities, work within 15 meters (50 feet) of the find must stop and a Secretary of the Interior (SOI)-qualified archaeologist must be notified immediately. Work may not resume until a qualified archaeologist can evaluate the significance of the find. Disturbance activities may continue in other areas. If the discovery proves significant, additional work such as archaeological testing, data recovery, or consultation with stakeholders may be warranted. **(Less than Significant)**

[39] SWCA Environmental Consultants, *Westborough Preschool Cultural Resources Technical Report.*

CONCLUSION

In the unlikely event of discovery of cultural resources during construction, the proposed Project would be required to comply with SSF 2040 General Plan policies and state law that addresses such an unanticipated circumstance, consistent with the requirements of the General Plan EIR. These policies and regulations ensure that Project construction does not cause a substantial adverse change in the significance of an archaeological resource (CEQA Checklist Question 5.V.b), and no mitigation is required.

c) Human Remains

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact CUL-3) determined that implementation of the SSF 2040 General Plan could disturb human remains, including those interred outside of formal cemeteries. Excavation and construction may uncover human remains that may not be marked in formal burial locations. Under CEQA, human remains are protected under the definition of archaeological materials as being "any evidence of human activity." [40]

The General Plan EIR cites California Health and Safety Code 7050.5 as setting forth provisions related to the treatment of human remains, including the treatment of human remains found in locations other than a dedicated cemetery and the responsibilities of the County Coroner. These requirements apply to all construction projects. The SSF 2040 General Plan also includes policies and actions intended to conserve and reduce impacts to archaeological resources, including human remains. Implementation of policies and actions in the SSF 2040 General Plan, as well as compliance with adopted federal, state, and local regulations for the protection of human remains would ensure that future development would not result in significant adverse effects to human remains. This impact was determined to be less than significant.

PROJECT ANALYSIS

The CRTR[41] found no evidence of human remains, burial features, or cemetery-related materials within the Project area. A comprehensive records search conducted through the CHRIS identified no known prehistoric or historic-era cemeteries, burial sites, or isolated human remains in or adjacent to the Project site. Additionally, the field survey did not identify surface indicators of human burial sites.

The Project site has been extensively disturbed by past development, including construction of the community center building, maintenance building, paved walkways, and landscaped park areas. These previous ground-disturbing activities reduce the likelihood that undiscovered human remains are present beneath the Project site.

While the potential for encountering human remains is considered low, the possibility of inadvertent discovery cannot be entirely ruled out during ground-disturbing activities such as grading, trenching, or utility installation.

In the event that unanticipated cultural resources are exposed during ground-disturbing activities, work within 15 meters (50 feet) of the find must stop and an SOI-qualified archaeologist must be notified immediately. Work may not resume until a qualified archaeologist can evaluate the significance of the find. Disturbance activities may continue in other areas. If the discovery proves significant, additional work such as archaeological testing, data recovery, or consultation with stakeholders may be warranted.

[40] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact CUL-3, p. 3.4-36

[41] SWCA Environmental Consultants, *Westborough Preschool Cultural Resources Technical Report*, 2025.

If the remains are determined to be Native American, the County Coroner must notify the NAHC, which will designate a Most Likely Descendant (MLD) pursuant to PRC Section 5097.98. The MLD will provide recommendations for respectful treatment and disposition, which may include:

- Preserving remains in place,
- Reburial nearby, or
- Implementing archaeological recovery methods if necessary.

Construction may only resume after the Coroner and MLD processes are completed and only when authorized by the City. **(Less than Significant with Project Requirement)**

CONCLUSION

In the unlikely event of discovery of human remains during construction, the proposed Project would be required to comply with state law that addresses such an unanticipated circumstance. Consistent with the conclusions of the General Plan EIR, these state regulations will ensure that Project construction does not disturb human remains, including those interred outside of formal cemeteries (CEQA Checklist Question 5.V.c), and no mitigation is required.

CEQA Conclusions Pertaining to Cultural Resources

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts to cultural resources as identified in that Program EIR, nor would it result in new significant impacts to cultural resources that were not previously identified. The General Plan EIR did not identify any mitigation measures related to cultural resources that would apply to the proposed Project, and no mitigation is required.

VI. Energy

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Result in potentially significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources, during project construction or operation?	LTS	■	□	–	LTS
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	LTS	■	□	–	LTS

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to energy resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project. However, no project-specific policies or mitigation measures from the General Plan EIR are required for the proposed Project.

a) Energy Resources

GENERAL PLAN EIR CONCLUSIONS

As discussed in greater detail below, the General Plan EIR found that new development pursuant to the SSF 2040 General Plan would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during Project construction or operation.

Construction

The General Plan EIR found that construction activities associated with individual development projects would consume energy in the form of petroleum fuel for heavy equipment, as well as from worker trips and material delivery trips to the construction sites. Temporary electrical grid power may also be provided to construction sites. The General Plan EIR concluded that future construction would be required to comply with requirements of the SSFMC and SSF 2040 General Plan policies and actions that directly and indirectly reduce energy consumption during construction. Future construction would also be required to comply with the California Code of Regulations that limit idling from both on- and off-road diesel-powered equipment. As such, construction activities were not found to result in wasteful, inefficient, or unnecessary consumption of energy, and this impact was found to be less than significant.

Operations

The General Plan EIR found that new development would consume natural gas and electricity for building heating and power, lighting, and water conveyance, among other operational requirements. Indirect energy use would include the pumping, treatment, and conveyance of water for buildings and landscaping. The electrical consumption and natural gas use associated with new development pursuant to the SSF 2040 General Plan was found to result in a net increase in consumption of 237.3 million kilowatt

hours (kWh) of electricity per year and 392.6 million British thermal units (BTU) of natural gas per year. These electricity and natural gas consumption rates account for 2019 California Building Code (CBC) standards, which require a variety of energy efficiency measures to be implemented during construction of nonresidential structures that will reduce energy use and air emissions. The General Plan EIR anticipates that future development within the city will be designed and built to minimize electricity and natural gas use. Moreover, all new developments in the city will be required to meet state and SSFMC energy efficiency regulations.

The General Plan EIR concluded that with compliance with SSF 2040 General Plan and 2022 SSF CAP policies and adherence to SSFMC development standards and state regulations, new development pursuant to the SSF 2040 General Plan would not result in wasteful, inefficient, or unnecessary consumption of energy. These policies and actions would minimize demands for energy resources and ensure their efficient use. Furthermore, the SSF 2040 General Plan minimizes petroleum use for transportation, and implementation of TDM and parking requirements would reduce VMT.

The General Plan EIR concluded that new development would be designed, built, and operated to minimize energy consumption and ensure that building energy consumption would not be wasteful, inefficient, or unnecessary, and that this impact would be less than significant.

PROJECT ANALYSIS

The City adopted the 2022 SSF CAP,[42] which identifies strategies and actions to reduce GHG emissions and achieve carbon neutrality by 2045. Through the 2022 SSF CAP, the City implements GHG reduction measures at both City-owned facilities and private developments, including, but not limited to, energy-efficient new construction, all-electric building design for new developments, installation of solar facilities at City buildings, implementation of landscape water requirements, use of high-efficiency water fixtures, expansion of the tree canopy, implementation of a TDM program, and installation of EV charging stations at City facilities.

During Project construction, energy consumption would primarily be associated with diesel and gasoline fuel consumption for the operation of construction equipment and for worker vehicle and haul trips. During Project operation, energy consumption would be limited to outdoor exterior and landscape lighting and landscape irrigation and maintenance. No natural gas is planned for consumption. The consumption of energy resources during Project construction would be temporary and the installation of new and energy-efficient lighting would meet City requirements for energy efficiency. Therefore, implementation of the proposed Project would not result in potentially short- or long-term significant impacts due to wasteful, inefficient, or unnecessary consumption of energy resources. While construction activities would involve diesel and gasoline fuel use for equipment and haul and commuter trips, overall consumption would be minimal and temporary, lasting approximately 12 months. This impact would be less than significant, and mitigation is not required. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, Project construction and operation would not result in wasteful, inefficient, or unnecessary consumption of energy resources (CEQA Checklist Question 5.VI.a). Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as it relates to construction-period criteria air pollutants would be required.

[42] City of South San Francisco, *City of South San Francisco Climate Action Plan*, 2022a.

b) Energy Efficiency and Renewable Energy Standards Consistency

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR found that the SSF 2040 General Plan would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The General Plan EIR concluded that compliance with the 2022 SSF CAP, SSF 2040 General Plan policies, and SSFMC development standards would ensure that new development pursuant to the SSF 2040 General Plan would not conflict with or obstruct state or local plans for renewable energy or energy efficiency, and implementation of the SSF 2040 General Plan would result in a less-than-significant impact.

PROJECT ANALYSIS

While the proposed Project would expand and improve existing uses at the Project site, the proposed Project would result in new development in the form of the proposed preschool. The 2022 SSF CAP has goals for new development that include providing on-site solar and batteries when feasible; constructing all-electric buildings; exceeding mandatory energy efficiency requirements by 20% or more; providing EV charging stations at municipal facilities; enhancing bicycle, transit, and pedestrian connectivity; implementing mandatory organics and food waste diversion; using water-efficient landscaping and high-efficiency water fixtures; expanding tree canopy cover; requiring all new municipal buildings and facilities to meet minimum Leadership in Energy and Environmental Design (LEED) silver standards; and requiring municipal projects to achieve 75% waste diversion from landfill.

The proposed project would be consistent with the 2022 SSF CAP. The preschool would meet or exceed energy efficiency requirements and be all-electric. The proposed Project includes 3 EV charging spaces, new bicycle racks, water-efficient landscaping, and high-efficiency water fixtures. Proposed building materials and mechanical equipment would include energy-efficient glazing, insulation, and energy-efficient models. At least 75% of asphalt or concrete removed during Project construction would be recycled. The proposed Project would also be consistent with all state plans for energy efficiency, including the *2022 Scoping Plan for Achieving Carbon Neutrality* (2022 Scoping Plan), State of California Energy Plan, California Renewables Portfolio Standard Program, Clean Energy and Pollution Reduction Act of 2015, State Alternative Fuels Plan, and California Green Building Standards Code (CALGreen; 24 California Code of Regulations [CCR] Part 11). For these reasons, the proposed Project would not conflict with a state or local plan for renewable energy or energy efficiency. This impact would be less than significant, and no mitigation is required. **(Less than Significant)**

CONCLUSION

Consistent with the General Plan EIR, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency (CEQA Checklist Question 5.VI.b). Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the project as relates to construction-period criteria air pollutants would be required.

CEQA Conclusions Pertaining to Energy

Based on the analysis, findings, and conclusions of the General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts related to energy use as identified in that Program EIR, nor would it result in new significant impacts related to energy use that were not previously identified. The General Plan EIR did not identify any additional mitigation measures related to energy that would apply to the proposed Project, and none would be required. Accordingly, no additional environmental review of the Project as relates to energy would be required.

VII. Geology

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death, involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ii) Strong seismic ground shaking? iii) seismic-related ground failure, including liquefaction? iv) Landslides?	LTS	■	□	SSFMC 15.08	LTS
b) Result in substantial soil erosion or the loss of topsoil?	LTS	■	□	SSFMC 14.04.180(d)	LTS
c) be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence , liquefaction or collapse?	LTS	■	□	CBC 1808A.2	LTS
d) Be located on expansive soil as defined in Table 18-1-B of the Uniform Building Code (1994), or other soils conditions creating substantial direct or indirect risks to life or property?	LTS	■	□	SSFMC 14.04.180(d)	LTS
e) Have soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LTS	■	□	–	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS w/MM	■	□	MM GEO-6	LTS w/MM

Information related to the Project and the Project site in the Geology section of this CEQA Checklist has been derived from the *Geotechnical Evaluation and Geologic Hazards Assessment New Portable Classrooms Westborough Recreation Center 2380 Galaway Drive Couth San Francisco, California* (Geotechnical Report) (attached as checklist Appendix B).[43]

[43] Ninyo and Moore Geotechnical and Environmental Sciences Consultants. 2024. *Geotechnical Evaluation and Geologic Hazards Assessment New Portable Classrooms Westborough Recreation Center 2380 Galaway Drive Couth San Francisco, California*. August 9.

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to geology resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to geology are avoided, minimized, or reduced to a less-than-significant level.

SSFMC Chapter 15.08: California Seismic Building Standards. SSFMC Chapter 15.08 adopts the California Building Standards Code by reference. Building permit issuance would be based upon satisfactory completion of any identified applicable measures. The Project is therefore subject to those seismic safety requirements as set forth in the California Building Standards Code, and the proposed Project shall be designed and constructed pursuant to those building standards.

SSFMC Chapter 14.04.180(d): Erosion Control. Pursuant to SSFMC Chapter 14.04.180(d), the proposed Project shall implement year-round effective erosion control, run-on and run-off control, sediment control, active treatment systems (as appropriate), good site management, and non-stormwater management through each subsequent phase of construction, including, but not limited to, site grading, building, and finishing of lots, until the Project site is stabilized by landscaping or the installation of permanent erosion control measures.

CBC Section 1808A.2: Foundations. CBC Section 1808A.2 requires that foundations shall be designed so that the allowable bearing capacity of the soil is not exceeded, and that differential settlement is minimized. The enforcing agency may require an analysis of foundation elements to determine subgrade deformation in order to evaluate the effects on the superstructure.

> **MM GEO-6:** Applicants, owners, and/or sponsors of all future development or construction projects shall be required to perform or provide paleontological monitoring for all proposed excavations in the Colma Formation and Merced Formation, including those buried in the shallow subsurface below Quaternary deposits, due to the high paleontological sensitivity for significant resources in these areas. Should significant paleontological resources (e.g., bones, teeth, well-preserved plant elements) be unearthed by the future project construction crew, the project activities shall be diverted at least 15 feet from the discovered paleontological resources until a professional vertebrate Paleontologist has assessed such discovered resources and, if deemed significant, such resources shall be salvaged in a timely manner. The applicant/owner/sponsor of said project shall be responsible for diverting project work and providing the assessment including retaining a professional vertebrate Paleontologist for such purpose. Collected fossils shall be deposited by the applicant/owner/sponsor in an appropriate repository (e.g., University of California Museum of Paleontology (UCMP), California Academy of Sciences) where the collection shall be properly curated and made available for future research.

The proposed Project will also be subject to the following regulatory requirements that also address erosion-related concerns:

- CBC Chapter 18, which regulates excavation activities and the construction of foundations and retaining walls, and CBC Chapter 33, which regulates grading activities, including drainage and erosion control
- Bay Area Air District Rules regarding fugitive dust, which require stabilizing soils to prevent erosion through the reduction of dust generation
- As more specifically cited in Section 5.X, *Hydrology and Water Quality*, of this CEQA Checklist, the proposed Project will be required to comply with all regulatory provisions of the Municipal

Regional Permit (MRP), including filing a Notice of Intent (NOI) for permit coverage under the Construction General Permit and preparation of a Stormwater Pollution Prevention Plan (SWPPP).

a) Seismic Hazards

GENERAL PLAN EIR

The General Plan EIR (Impact GEO-1) found that new development pursuant to the SSF 2040 General Plan would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, including liquefaction and landslides.[44] Given the City's proximity to the San Andreas Fault Zone as well as other active faults, the General Plan EIR found it likely that the city would experience periodic minor to strong earthquake motion. Residents and employees would potentially be exposed to the effects of surface fault rupture, seismic ground shaking, liquefaction, settlement, and landslides from regional and local earthquakes. Structures built on steep slopes could be exposed to the risk of landslide, and new structures could exacerbate existing landslide conditions. New structures and other improvements could also experience substantial damage during seismic events.

The General Plan EIR cites policies and actions included in the SSF 2040 General Plan, as well as regulations of the SSFMC and Zoning Ordinance, that address potential impacts related to surface fault rupture, seismic shaking, seismic-related ground failure, and landslides. Future projects would be required to conduct an environmental analysis and the City would determine which policies and sections of the SSFMC and Zoning Ordinance apply, depending on the specific characteristics of the project type and/or project site.

The General Plan EIR concluded that compliance with local codes, compliance with mandatory CBC requirements, and implementation of SSF 2040 General Plan policies would ensure that future development projects are appropriately investigated for potential seismic hazards, and that any new buildings and structures are constructed to withstand the anticipated range of seismic events. Individual development projects would be required to undergo Project-specific environmental review, which may require additional site-specific or Project-specific measures to reduce any potential for loss, injury, or death in the event of a seismic event. The General Plan EIR concludes that, following implementation of these policies, impacts caused by seismic hazards will be less than significant.

PROJECT ANALYSIS

Fault Rupture

The Project site is not located within an established Earthquake Fault Zone according to the California Geologic Survey (CGS).[45] The nearest known active fault is the San Andreas Fault, located approximately 0.27 mile west of the Project site. The Project site is not underlain by any known active faults; therefore, the potential for ground surface rupture due to fault movement at the Project site is considered low. Because the Project site is not intersected or immediately adjacent to an active fault trace, the potential for fault rupture impacts is negligible. Accordingly, the proposed Project would have no impact related to ground surface rupture. **(No Impact)**

[44] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact GEO-1, p. 3.6-17

[45] California Geological Survey (CGS). 2023. Earthquake Zones of Required Investigation Map (Alquist–Priolo Earthquake Fault Zones). California Department of Conservation. Available at: https://maps.conservation.ca.gov/cgs/EQZApp/. Accessed November 2025.

Ground Shaking

There are several active faults that are capable of producing strong ground shaking at the Project site. The Working Group on California Earthquake Probabilities (WGCEP) periodically assesses the probabilities of earthquakes for numerous faults in California and provides probability estimates.[46] According to the 2015 assessment, there is a 72% probability that at least one magnitude 6.7 or greater earthquake will occur in the Bay Area between 2014 and 2043. Probabilities of a magnitude 6.7 or greater earthquake occurring on the Hayward, Calaveras, and San Andreas Faults during this period are 14.3%, 7.4%, and 6.4%, respectively.

Considering the proximity of the Project site to active faults capable of producing a maximum moment magnitude of 6.0 or more, the Project area has a high potential for experiencing strong ground motion. Seismic design parameters calculated using the Structural Engineers Association of California and Office of Statewide Health Planning and Development (SEAOC/OSHPD) web-based seismic design tool are provided in Section 9.1 of the Geotechnical Report (see Appendix B). With adherence to the CBC and site-specific geotechnical recommendations, the proposed Project would be designed to withstand anticipated ground motions. Therefore, impacts related to strong seismic ground shaking would be less than significant. **(Less than Significant)**

Seismically Induced Liquefaction

The strong vibratory motions generated by earthquakes can trigger a rapid loss of shear strength in saturated, loose, granular soils of low plasticity (liquefaction) or in wet, sensitive, cohesive soils (strain softening). Liquefaction and strain softening can result in a loss of foundation-bearing capacity or lateral spreading of sloping or unconfined ground. Liquefaction can also generate sand boils leading to subsidence at the ground surface. The potential for liquefaction to occur is considered more significant where Holocene alluvial deposits along with shallow groundwater are present within the upper 50 feet of the ground surface.

According to the Geotechnical Report, the Project site is not located within a liquefaction hazard zone established by the State Geologist. Regional studies of liquefaction susceptibility indicate that the liquefaction susceptibility at the Project site is very low. Given the Project site's geologic conditions and low susceptibility to liquefaction, no significant risk of ground failure or liquefaction-related damage is anticipated. Therefore, impacts related to liquefaction hazards would be less than significant. **(Less than Significant)**

Landslides

According to the Geotechnical Report, the Project site is located at an elevation ranging from approximately 409 to 430 feet above mean sea level (MSL). The Project site is not located below MSL or within a coastal or flood hazard area. Given the Project site's elevation and distance from coastal or tidal influences, the potential for flooding or elevation-related geologic hazards is minimal. Therefore, impacts associated with landslides would be less than significant. **(Less than Significant)**

[46] Field, E.H., G.P. Biasi, P. Bird, T.E. Dawson, K.R. Felzer, D.D. Jackson, K.M. Johnson, T.H. Jordan, C. Madden, A.J. Michael, K.R. Milner, M.T. Page, T. Parsons, P.M. Powers, B.E. Shaw, W.R. Thatcher, R.J. Weldon II, and Y. Zeng. 2015. Long-Term Time-Dependent Probabilities for the Third Uniform California Earthquake Rupture Forecast (UCERF3). *Bulletin of the Seismological Society of America* 105(2A):511–543. Available at: https://pubs.geoscienceworld.org/ssa/bssa/article-abstract/105/2A/511/331850/Long-Term-Time-Dependent-Probabilities-for-the?redirectedFrom=fulltext. Accessed November 2025.

CONCLUSION

Consistent with the findings of the General Plan EIR, full compliance with the CBC regulations and building standards, with site-specific recommendation as provided by the geotechnical engineer, will reduce the effects of strong ground shaking in the event of a likely earthquake scenario (CEQA Checklist Question 5.VII.a) to levels considered acceptable by professional engineers, and therefore considered under CEQA to be less than significant. No mitigation is required.

b) Soil Erosion

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact GEO-2) found that future development pursuant to the SSF 2040 General Plan would not result in substantial soil erosion or the loss of topsoil. Future development was expected to involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As such, soil erosion is dependent on individual site locations and conditions on-site during construction. [47]

The General Plan EIR cited compliance with National Pollutant Discharge Elimination System (NPDES) General Construction Permit requirements, SSF 2040 General Plan policies and actions, and SSFMC and Zoning Ordinance regulations that all address means for minimizing soil erosion and the loss of topsoil. With implementation of these permit requirements, policies, and regulations, potential impacts related to soil erosion and loss of topsoil were found to be reduced to less-than-significant levels.

PROJECT ANALYSIS

The proposed Project could potentially generate soil erosion, primarily from site preparation activities. Vegetation removal in landscaped areas could reduce soil cohesion and remove buffers from wind, water, and surface disturbance, potentially rendering exposed soils susceptible to erosive forces. Excavation or grading may result in erosion as bare soil becomes exposed. Construction-period earth-disturbing work would be temporary, and erosion effects would depend largely on the length of time soil is subject to conditions that would be affected by erosion processes.

After Project construction is complete, substantial erosion is unlikely to occur because all disturbed areas would be stabilized through landscaping, paving, and implementation of permanent drainage and stormwater control measures. The proposed Project would comply with the SSFMC, the Construction General Permit, and applicable stormwater BMPs, which collectively minimize soil loss and control sedimentation both during and after construction. Compliance with these measures would ensure that erosion and stormwater runoff are controlled consistent with the standards and expectations identified in the General Plan EIR, which evaluated similar urban development within the city. Therefore, Project construction and operation as proposed would not result in substantial erosion or loss of topsoil, and impacts would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project's effects related to erosion during construction (CEQA Checklist Question 5.VII.b) will be fully addressed through implementation of existing regulations, and this impact would be reduced to less than significant.

[47] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact GEO-2, p. 3.6-23

c) Unstable Geologic Unit

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact GEO-3) found that future development pursuant to the SSF 2040 General Plan would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of new development, and as such would not result in settlement, an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse.[48]

The General Plan EIR found that certain geologic units present in the city could have the potential for landslides, slope instability, rock falls, liquefaction, settlement, and liquefaction-induced lateral spreading. Other geologic hazards, such as subsidence or collapse, are also present. As such, development allowed under the SSF 2040 General Plan could occur within areas containing unstable geologic units or be located on soils that are unstable or could become unstable from such development. However, the General Plan EIR cites compliance with the California Standards Building Code and the regulations of SSFMC and Zoning Ordinance as including policies and regulations specifically designed to protect individuals from injuries and minimize property damage resulting from development on unstable geologic units or unstable soils by limiting development in certain areas and requiring increased review and mitigation where appropriate.

Future projects located within areas containing unstable geologic units or soils would be required to conduct an environmental analysis at the time a specific project is defined, including preparation of site-specific soils and geologic reports for review and approval by the City Engineer, and incorporation of the recommended actions during construction. The General Plan EIR concludes that, following implementation of these policies, impacts caused by unstable geologic units will be less than significant.

PROJECT ANALYSIS

The Project site is generally flat and does not contain slopes or geologic features that would be susceptible to landslides or other forms of slope instability. According to the Geotechnical Report, the Project site is underlain primarily by the Merced Formation and areas of undocumented fill. The Geotechnical Report concluded that the Project site is not located on a geologically unstable unit, nor would the proposed Project be expected to destabilize the Project site.

The Project site is not within an earthquake-induced landslide hazard zone, and subsurface materials were found to be very stiff to hard sandy silt and clay with low expansion potential. Groundwater was not encountered during subsurface exploration, and no evidence of liquefiable or collapsible soils was identified. The Geotechnical Report determined that liquefaction and its related effects, such as dynamic settlement, sand-boil-induced subsidence, or lateral spreading, and are not design constraints for the proposed Project.

The Project site is considered geotechnically stable under existing and proposed conditions. With implementation of the geotechnical recommendations during Project construction, the proposed Project would not result in or be affected by unstable geologic conditions. Therefore, impacts related to unstable or expansive soils would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the Project would be required to comply with regulatory standards, including CBC requirements related to foundation support. Based on the

[48] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact GEO-3, p. 3.6-24

Geotechnical Report, foundation designs consistent with these regulatory standards would reduce the effects of potential soil settlement (CEQA Checklist Question 5.VII.c) to levels considered acceptable by professional engineers and therefore less than significant, and no mitigation is required.

d) Expansive or Corrosive Soils, or Hazardous Geologic Conditions

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact GEO-4) found that future development pursuant to the SSF 2040 General Plan would not be located on expansive soil that could create substantial direct or indirect risks to life or property.[49]

The General Plan EIR found that new development constructed on expansive soils could be subject to damage or become unstable when underlying soil shrinks or swells. Expansive soils in South San Francisco are generally located within the Colma Formation, which runs horizontally through the central portion of the city. Along the eastern perimeter of the city near San Francisco Bay is primarily artificial fill (artificial fill over tidal flats, alluvium, and slope debris and ravine fill) susceptible to damage from expansive soils. The General Plan EIR cited CBC and SSFMC requirements that address soil-related hazards such as expansive soils. Typical measures to treat hazardous soil conditions involve removal, proper fill selection, and compaction. In cases where soil remediation is not feasible, the CBC requires structural reinforcement of foundations to resist expansive soil forces.

The General Plan EIR concluded that compliance with the rules and regulations of SSFMC and Zoning Ordinance, including compliance with the CBC, and implementation of the policies and actions in the SSF 2040 General Plan, would ensure that potential impacts related to expansive soils remain less than significant.

PROJECT ANALYSIS

Analysis of soil samples collected throughout Westborough Park was used to evaluate the potential for corrosion of buried metals and concrete. Based on resistivity test results, the soils were classified as corrosive. This means that unprotected metal utilities, pipelines, or structural components in contact with the soil could experience accelerated deterioration over time due to electrochemical reactions. Corrosive soils can also affect the longevity of buried concrete if proper protective measures are not applied.

As noted in the Geotechnical Report, mitigation of this condition can be achieved through standard engineering design measures such as using corrosion-resistant materials, protective coatings, or cathodic protection systems for buried metal components. With implementation of these design recommendations, the potential for corrosion-related damage would be adequately controlled, and impacts related to soil corrosivity would be less than significant.

Some clay-rich soils contain minerals that expand when they absorb water and contract when they dry, a property referred to as expansiveness. These volume changes can cause heaving or cracking in overlying structures, pavement, and foundations. The degree of expansiveness is typically determined through laboratory testing.

According to the Geotechnical Report, soils collected from borings across the Project site exhibited “very low” to “low” expansion potential based on expansion index test results. This indicates that the native soils have minimal capacity to shrink or swell in response to changes in moisture. Therefore, the soils at

[49] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact GEO-4, p. 3.6-26

the Project site are not considered expansive, and risks associated with expansive soils affecting structures or hardscape elements are low, and impacts related to expansive soils would be less than significant.

Although the Project site was not identified as containing highly expansive soils, the Geotechnical Report determined that the near-surface soils are corrosive to buried metal and concrete structures. The Geotechnical Report recommends that all underground metallic elements (such as pipelines, conduit, and structural supports) be properly protected against corrosion through the use of corrosion-resistant materials, protective coatings, or cathodic protection systems. Additionally, concrete in direct contact with the native soils should be designed with appropriate mix specifications and protective barriers to reduce the risk of chemical deterioration.

Adherence to CBC and SSFMC standards would prevent premature degradation of underground utilities and foundations, ensuring the long-term structural integrity of the Project improvements.

With compliance with the geotechnical recommendations and applicable CBC requirements, potential impacts related to corrosive soils would be minimized, and the proposed Project's effects on structures and buried materials would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project will be required to implement CBC Standards that ensure new structures are adequately supported and are not susceptible to the adverse effects of expansive or corrosive soils. Detailed recommendations have been identified and that apply specifically to corrosive soil conditions (CEQA Checklist Question 5.VII.d), and no mitigation is required.

e) Septic System Capability

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR found that future development pursuant to the SSF 2040 General Plan would not be located on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The SSF 2040 General Plan encourages growth management and development location and timing to be planned in consideration of infrastructure capacity, public service availability, and fiscal impacts. As such, the General Plan EIR found that new development facilitated by the SSF 2040 General Plan would be served by the existing sewer system, and most new development would connect to existing sewer lines. Should any new development require the installation of septic tanks or alternative wastewater disposal systems, the SSF 2040 General Plan includes policies and actions to ensure that any new development can be feasibly constructed according to soil conditions. The General Plan EIR concludes that, following implementation of these policies, impacts regarding septic system capacity will be less than significant..[50]

PROJECT ANALYSIS

The local sewer system would provide sewer service to the proposed Project, and on-site wastewater treatment systems are not required or proposed at the Project site. Consistent with the findings of the General Plan EIR, the proposed Project would not have an adverse effect pertaining to septic system capabilities (CEQA Checklist Question 5.VII.e). **(Less Than Significant)**

[50] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact GEO-5, p. 3.6-27

CONCLUSION

Because the proposed Project would connect to the existing municipal sewer system and no on-site wastewater treatment or septic systems are proposed, there would be no potential for impacts related to septic system capability or wastewater treatment capacity. The proposed Project's reliance on existing public sewer infrastructure is consistent with the findings and service assumptions of the General Plan EIR. Therefore, there would be no impact related to wastewater disposal and septic system suitability.

f) Paleontological Resources

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (GEO-6) identified that future development pursuant to the SSF 2040 General Plan could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. Based on paleontological records, the potentially fossiliferous areas are the Merced Formation and the Colma Formation. The Merced Formation is located along the western portion of the city and has a high sensitivity and a moderate potential for significant paleontological resources. The Colma Formation is located in the central portion of the city and in parts of the East of 101 subarea and has a high paleontological sensitivity and a low paleontological potential. As such, the General Plan EIR determined that construction-related and earth-disturbing actions within the Merced Formation and Colma Foundation have the potential to damage or destroy fossils resulting in significant impacts on paleontological resources. [51]

The General Plan EIR identified MM GEO-6, which requires paleontological monitoring of all proposed excavations within the Merced Formation and Colma Formation. As such, with implementation of General Plan EIR MM GEO-6, the General Plan EIR concluded that potential impacts to paleontological resources would be reduced to less than significant.

The General Plan EIR found that the remaining portions of the city have a low paleontological sensitivity and low paleontological potential, but in the unlikely event that any earth-disturbing construction-related activities uncover significant paleontological resources (e.g., bones, teeth, well-preserved plant elements), potential impacts to paleontological resources would be minimized through compliance with federal and state laws that protect paleontological resources. The General Plan EIR concludes that, following implementation of these policies, impacts to paleontological resources will be less than significant.

PROJECT ANALYSIS

According to the General Plan EIR, high-sensitivity paleontological formations within the city include the Merced Formation and the Colma Formation. The Project site, located within Westborough Park, is not underlain by either formation and is instead mapped as artificial fill and Quaternary surficial deposits, which the General Plan EIR identifies as having low paleontological sensitivity and low potential for containing significant paleontological resources. Although the likelihood of encountering fossils during Project construction is low, ground-disturbing activities always carry a remote possibility of disturbing previously unknown paleontological materials.

Consistent with State CEQA Guidelines 15064.5 and the approach taken in the General Plan EIR, including implementation of General Plan EIR MM GEO-6, the proposed Project would be required to follow standard inadvertent discovery procedures if paleontological resources are encountered, including immediate work stoppage, evaluation by a qualified paleontologist, and recovery/curation of any

[51] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact GEO-6, p. 3.6-28

significant finds in accordance with professional standards. These existing regulatory requirements ensure any unanticipated discoveries would be appropriately managed. **(Less than Significant with Mitigation)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to implement CBC standards to ensure that excavations for new structures do not directly or indirectly destroy a unique paleontological resource (CEQA Checklist Question 5.VII.f). With implementation of General Plan EIR MM GEO-6, potential impacts to paleontological resources would be reduced to less than significant.

CEQA Conclusion Pertaining to Geology

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant geologic or paleontological impacts identified in that Program EIR, nor would it result in new significant impacts related to geology that were not previously identified. The General Plan EIR identified one mitigation measure related to geology that would apply to the proposed Project, and no other mitigation other than existing regulatory requirements would be needed. No further environmental review of the proposed Project pertaining to the topics of geology is required.

VIII. Greenhouse Gas Emissions

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	LTS	■	□	–	LTS
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	LTS	■	□	–	LTS

Information related to the proposed Project and the Project site in the Greenhouse Gas Emissions section of this CEQA Checklist has been derived from the *Air Quality and Greenhouse Gas Report for the Westborough Preschool Expansion Project, San Mateo County, California* (attached to this checklist as Appendix A).[52]

a) Greenhouse Gas Emissions

GENERAL PLAN EIR CONCLUSIONS

As discussed in greater detail below, the General Plan EIR determined that future development pursuant to the SSF 2040 General Plan would not generate GHG emissions that may have a significant impact on the environment.

Construction Emissions

Pertaining to construction-period GHG emissions, the General Plan EIR found that future development would be required to comply with the requirements of the SSFMC, SSF 2040 General Plan, and 2022 SSF CAP to reduce GHG emissions during construction. Future construction would also be required to comply with the California Code of Regulations requirements that limit idling from both on- and off-road diesel-powered equipment. Accordingly, the General Plan EIR determined that future construction activities would not result in potentially significant impacts related to GHG emissions, and this impact was found to be less than significant. The General Plan EIR also noted that construction GHG emissions would be further reduced with adherence to General Plan EIR MM AIR-1a (see Section 5.III, *Air Quality*).

Operational Emissions

The General Plan EIR identified that long-term operational sources of GHG emissions would include mobile sources (e.g., vehicle exhaust), energy consumption (e.g., electricity and natural gas), solid waste, wastewater treatment, and water consumption (e.g., electricity used to deliver and treat water consumed by customers in the city). The operational GHG emissions from buildout of the SSF 2040 General Plan were calculated using the CalEEMod emissions model for area sources, energy usage, solid waste, water,

[52] SWCA Environmental Consultants. *Air Quality and Greenhouse Gas Report for the Westborough Preschool Expansion Project, San Mateo County, California*. December 2025.

and wastewater and Emission Factors Model (EMFAC) 2021 for mobile sources. The operational GHG emissions calculated by CalEEMod were based on SSF 2040 General Plan buildout conditions at year 2040, including up to 38,959 dwelling units and up to 50,052,914 square feet of nonresidential space. The GHG emissions forecast assumes that several state and local GHG reduction measures will be implemented by 2040, including the following actions:

- Implementation of the Renewable Portfolio Standard, which requires electricity providers to increase the portion of energy that comes from renewable sources to 60% by 2030 and zero carbon by 2045;
- Implementation of the most current Title 24 building energy use standards;
- Reduction of indoor residential and indoor/outdoor commercial lighting energy usage as detailed in AB 1109;
- Implementation of California Advanced Clean Car, including Pavley standards and Executive Order N-79-20 that requires 100% of new passenger vehicles sold in California to be zero emissions by 2035;
- Adoption of Complete Streets standards to expand pedestrian and bicycle infrastructure and provide availability for future residents and visitors with infrastructure for alternative modes of transportation and reduce reliance on motorized transportation; and
- Improvements to public transit and ridesharing programs.

In addition to these state and local GHG reduction measures, the General Plan EIR cited numerous SSF 2040 General Plan and 2022 SSF CAP actions that would help reduce GHG emissions generated from existing and future development.

The General Plan EIR determined that at buildout, the city is estimated to generate approximately 872,000 million tons of carbon dioxide equivalent (MT CO_2e) per year in 2040, with a service population (residents and employees) of an estimated 245,700 people. Citywide GHG emissions per service population were projected to be 3.55 MT CO_2e in 2040. These GHG emissions per service population were found to not exceed a 4.0 MT CO_2e per service population threshold, which was based on the CARB 2022 Scoping Plan and represents the rate of emission reductions necessary for the City to achieve a fair share of statewide GHG reductions necessary to meet the state's long-term GHG reduction targets. The General Plan EIR concluded that buildout of the SSF 2040 General Plan would result in annual per service population emissions of 3.55 MT CO_2e, which is below the established significance threshold of 4.0 MT CO_2e per service population, and as such, this impact was found to be less than significant.

PROJECT ANALYSIS

Construction Emissions

Because construction emissions are temporary and variable, the Bay Area Air District has not developed a quantitative threshold of significance for construction-related GHG emissions. Instead, the Bay Area Air District considers construction GHG emissions to be less than significant so long as they are quantified and disclosed, as these emissions are short-term and variable.

Project construction would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described. The proposed Project's estimated annual construction GHG emissions are presented in Table 5-4.

Table 5-4. Estimated Annual Construction GHG Emissions

	Metric Tons CO_2 Equivalent per Year			
Construction Years	**CO_2e**	**CO_2**	**N_2O**	**CH_4**
2026	2,387	2,362	0.12	0.12
2027	916	908	0.02	0.04
Total	**3,303**	**3,270**	**0.14**	**0.16**
Amortized Construction Emissions	***110.1 MT CO_2e/annually***			

As shown in Table 5-4, the estimated total GHG emissions during construction would be approximately 3,303 MT CO_2e over the construction period. Estimated project-generated construction emissions amortized over 30 years would be approximately 110.1 MT CO_2e per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during Project construction would occur only when construction is active, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. The Bay Area Air District does not consider construction GHG emissions to be significant if they are disclosed as they are short-term and variable. Furthermore, the proposed Project as documented in Chapter 4, *Project's Consistency with the General Plan and Zoning*; the SSFMC; and below, the proposed Project is consistent with the SSF 2040 General Plan, SSFMC, and 2022 SSF CAP. Therefore, pursuant to Bay Area Air District requirements and the findings of the General Plan EIR, Project construction would not generate GHG emissions that would have a significant impact on the environment. As with the SSF 2040 General Plan, emissions would be further reduced with adherence to General Plan EIR MM AIR-1a. **(Less than Significant)**

Operational Emissions

Pursuant to the BAAQMD CEQA Guidelines, the Bay Area Air District considers operational emissions to be less than significant if the proposed Project is consistent with a qualified GHG reduction strategy or certain land use project design elements.[53]

The SSF 2040 General Plan outlines plans to achieve a carbon-neutral community by 2045, which is consistent with the goals outlined in the 2022 SSF CAP. The 2022 SSF CAP is intended to establish an analytical pathway per State CEQA Guidelines Section 15183.5(b) to allow projects to be analyzed through a streamlined or tiered approach utilizing an adopted Greenhouse Gas Reduction Plan. As the General Plan EIR was certified and the 2022 SSF CAP was adopted, the 2022 SSF CAP is considered a qualified GHG Reduction strategy.

Accordingly, and pursuant to State CEQA Guidelines Section 15183.5(b)(2), the 2022 SSF CAP is used in the analysis of the proposed Project to identify those requirements specified in the 2022 SSF CAP that apply to the proposed Project, and providing substantial evidence to demonstrate the proposed Project's compliance with the specific requirements of the 2022 SSF CAP. This analysis identifies those Actions of the 2022 SSF CAP that apply to the proposed Project, and a discussion of the proposed Project's compliance with those Actions.

Clean Energy and Built Environment Actions

The proposed Project will comply with all CALGreen energy efficiency codes and strive to surpass the minimum requirements with energy efficient appliances and building practices. By obtaining its electrical

[53] Bay Area Air Quality Management District (BAAQMD). *CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans.* April 2022.

needs from Peninsula Clean Energy's renewable energy portfolio (and delivered by PG&E), this 2022 SSF CAP Action can be achieved. Natural gas will not be utilized for project construction or operations and operations will utilize electric building systems.

Transportation and Land Use Actions

The proposed Project is required to and shall implement and monitor a TDM Plan, the purpose of which is to provide options to encourage future employers and employees to use non-automobile transportation modes; encourage carpooling, biking, walking and transit use; and incorporate on-site design features to promote the same. A TDM plan meeting the City's Tier 2 requirements will be initiated at the start of the proposed Project, consistent with City's TDM Ordinance and 2022 SSF CAP Transportation Action. In addition, the proposed parking plan maintains a total of 59 stalls—pick-up/drop-off stalls would increase by three and would be moved to the north end of the parking lot, handicapped stalls would increase by one, three regular stalls would be converted to compact stalls, and regular stalls would decrease from 56 to 50, consistent with parking requirements of the 2022 SSF CAP.

Waste Actions

The proposed Project shall enroll in the City's three-container organic waste collection services with source-separated recyclable materials, thereby assisting in the reduction of landfill methane emissions. Additionally, the proposed Project will arrange for and have solid waste collection service, with solid waste, recyclable materials, and salvageable materials (including organics/food waste) separated for collection by the City's authorized recycling agent.

Water and Wastewater Actions

The proposed Project will comply with the latest CALGreen building standards, including those standards pertaining to water efficiency. The current 2025 CALGreen standards contain mandatory measures for water-efficient fixtures and equipment in new buildings, and the proposed Project will be required to comply with these measures. The proposed Project would replace and add new wastewater, water, and stormwater drainage throughout the Project site. The 2022 SSF CAP Water and Wastewater Actions require projects to meet a higher efficiency standard, comparable to the CALGreen "voluntary" Tier 1 or Tier 2 standards. The proposed Project will be required to meet these higher standards pursuant to future building permits in order to demonstrate compliance with the 2022 SSF CAP.

Carbon Sequestration Actions

Project landscaping would include drought-tolerant and native species with new efficient drip irrigation that meets state WELO requirements. Five planting areas would be added on-site for stormwater bioretention and treatment.

Based on the above analysis, the proposed Project would be consistent with the 2022 SSF CAP. The proposed Project's proposed development plans indicate that the proposed Project will be consistent with individual 2022 SSF CAP Actions related to clean energy, building design, transportation and land use, solid waste, water and wastewater, and carbon sequestration. The proposed Project does not present any inherent inconsistencies with other 2022 SSF CAP Actions. As the proposed Project would be consistent with a qualified GHG reduction strategy, the Bay Area Air District considers the proposed Project's operational GHG emissions to be less than significant.

The proposed Project would also be consistent with the Bay Area Air District's land use project design elements, which include:

1. Buildings

a. No natural gas appliances or natural gas plumbing
b. No wasteful, inefficient, or unnecessary energy usage

2. Transportation
    a. Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15%) or meet a locally adopted SB 743 VMT target.
    b. Comply with off-street electric vehicle requirements in the most recently adopted 2025 version of CALGreen Tier 2.

The Bay Area Air District considers projects that include these design elements to have a less-than-significant impact related to GHG emissions and consistent with applicable initiatives to reduce GHG emissions. The proposed Project will not use natural gas and as documented in Section 5.VI, *Energy*, will not result in any wasteful, inefficient, or unnecessary energy usage. The *SSF Westborough Preschool Expansion Project VMT/CEQA Initial Study Assessment Technical Memorandum* (Transportation Assessment) (attached as checklist Appendix D)[54] determined that the proposed Project is a local-serving facility and therefore is presumed to generate VMT below the regional average consistent with Bay Area Air District guidance and verified by the County's VMT Estimation Tool. The proposed Project would provide three EV parking spaces, consistent with CALGreen Tier 2 requirements.

As the proposed Project would be consistent with a qualified GHG reduction strategy and the Bay Area Air District's land use project design elements, Project operation would not generate GHG emissions that would have a significant impact on the environment. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not generate GHG emissions that would directly or indirectly have a significant impact on the environment. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as it relates to GHG emissions would be required.

b) Conflict with Plan, Policy or Regulation that Reduces Emissions

SSF GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact GHG-2) concluded that implementation of the SSF 2040 General Plan would not conflict with any applicable plan, policy, or regulation of an agency adopted for purposes of reducing GHG emissions.[55]

The General Plan EIR examined each of the following plans, policies and regulations, finding the SSF 2040 General Plan and its 2022 SSF CAP to be fully consistent:

- *CARB Climate Change Scoping Plan*: The 2017 Climate Change Scoping Plan recommends a local, plan-level target of no more than 6.0 MT CO_2e per capita by 2030, and no more than 2.0 MT CO_2e per capita by 2050. Based on a linear interpolation of these two GHG reduction goals, the target for the SSF 2040 General Plan was no more than 4.0 MT CO_2e per service population. The General Plan EIR projected citywide emissions of 3.55 MT CO_2e per service

[54] Kittelson & Associates, Inc. 2025. *SSF Westborough Preschool Expansion Project VMT/CEQA Initial Study Assessment Technical Memorandum*. Prepared for SWCA Environmental Consultants.

[55] City of SSF, *SSF 2040 General Plan Draft EIR*, 2022, Impact GHG-2, beginning at page 3.7-66

population in 2040, finding these emissions to meet the GHG reduction target of the 2017 Climate Change Scoping Plan. The General Plan EIR also concluded that future development projects would be required to comply with state standards for new construction as well as policies and actions of the SSF 2040 General Plan and 2022 SSF CAP that aim to reduce GHG emissions. Therefore, development facilitated by the General Plan would not conflict with the 2017 Climate Change Scoping Plan.

- *Plan Bay Area 2050: Strategy for a Sustainable Region*: The General Plan EIR determined that housing development pursuant to the SSF 2040 General Plan would promote new population and employment growth in and around Priority Development Areas (PDAs), especially in areas that are transit-oriented, and as infill development opportunity areas within existing communities. The General Plan EIR also found that policies and actions of the SSF 2040 General Plan encourage the use of alternative modes of travel and reduce dependence on auto use, consistent with Plan Bay Area's vision. Moreover, the SSF 2040 General Plan contains several policies and actions that would support Plan Bay Area 2050 policies and strategies related to GHG emissions. The General Plan EIR concluded that development facilitated by the General Plan would not conflict with Plan Bay Area 2050.
- *Bay Area Air Quality Management District 2017 Clean Air Plan*: The General Plan EIR included a detailed analysis of the SSF 2040 General Plan's consistency with the 2017 Clean Air Plan, finding consistency with control measures that focus primarily on reducing GHG emissions. This analysis demonstrated the SSF 2040 General Plan's consistency with applicable control measures of the 2017 Clean Air Plan.

In conclusion, the General Plan EIR determined that development facilitated by the SSF 2040 General Plan would be required to comply with requirements of the SSF 2040 General Plan, the updated 2022 SSF CAP, and SSFMC regulations to reduce GHG emissions, as well as existing and new federal, state, and local statutes and regulations related to GHG emissions. The SSF 2040 General Plan and associated 2022 SSF CAP was found to be consistent with the plans and policies adopted for purposes of reducing the emissions of GHGs, and this impact was determined to be less than significant.

PROJECT ANALYSIS

As documented in Chapter 4, *Project's Consistency with the General Plan and Zoning*, and CEQA Checklist Question 5.VIII.a, the proposed Project is consistent with the SSF 2040 General Plan and 2022 SSF CAP. As the SSF 2040 General Plan and 2022 SSF CAP were previously found to be consistent with state and local plans adopted for purposes of reducing the emissions of GHGs, then the proposed Project is similarly consistent with state and local plans for renewable energy or energy efficiency. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the proposed Project as it relates to this topic would be required.

CEQA Conclusions Pertaining to GHG Emissions

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts related to GHG

emissions as identified in that Program EIR, nor would it result in new significant impacts related to GHG that were not previously identified. The General Plan EIR did not identify any additional mitigation measures related to GHG that would apply to the proposed Project, and none would be needed. Therefore, no additional environmental review of the proposed Project as it relates to GHG emissions would be required.

IX. Hazards and Hazardous Materials

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	LTS	■	□	Construction General Permit SWPPP SSFMC 20.300.010 California Health and Safety Code 20.6.95	LTS
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	LTS	■	□	California Health and Safety Code 20.6.95	LTS
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	LTS	■	□	–	LTS
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	LTS	■	□	–	No Impact
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	LTS	■	□	–	LTS
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	LTS	■	□	–	LTS
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	See Section 5.XIX., *Wildfire*, this CEQA Checklist				

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts regarding hazards and hazardous materials resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure

that impacts regarding hazards and hazardous materials are avoided, minimized, or reduced to a less-than-significant level.

Construction General Permit: As a discharger associated with construction activity, the Project applicant shall file an NOI to comply with, and undertake all other activities required by the statewide *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities* (Construction General Permit) for each subsequent phase of development. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground such as stockpiling or excavation.

Storm Water Pollution Prevention Plan: Whereas the proposed Project is subject to the state's Construction General Permit and NPDES requirements, the Project applicants shall submit and implement a SWPPP for each phase of construction, developed pursuant to the Construction General Permit. The Project applicant must prepare a SWPPP, and implement inspection, monitoring, and reporting requirements appropriate to the proposed Project's risk level as specified in the SWPPP. The SWPPP shall include:

- A site map
- A description of construction activities and potential pollutants
- BMPs that will be employed to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources, such as petroleum products, solvents, paints, and cement
- All NPDES permits also have inspection, monitoring, and reporting requirements

The following regulatory requirements apply to all facilities handling hazardous or acutely hazardous materials, specifically intended to reduce the risk of upset to adversely affect the public or the environment.

SSFMC Section 20.300.010: Performance Standards for Hazardous and Extremely Hazardous Materials: Pursuant to SSFMC Section 20.300.010N the use, handling, storage, and transportation of hazardous and extremely hazardous materials shall comply with the provisions of the California Hazardous Materials Regulations, California Fire Code, and CBC, as well as the laws and regulations of the California Department of Toxic Substances Control (DTSC) and the San Mateo County Environmental Health Department (SMCEHD). Activities, processes, and uses shall not generate or emit any fissionable or radioactive materials into the atmosphere, a sewage system or onto the ground.

California Health and Safety Code 20.6.95: Hazardous Material Business Plan: The SMCEHD enforces regulations of California Health and Safety Code, Division 20 Chapter 6.95, including requirements to submit a Hazardous Material Business Plan (HMBP). If future teachers or custodial staff of the proposed Project's new classroom buildings handle and/or store hazardous materials at minimum reportable quantities, those staff members will be required to file a HMBP that must include:

- Summary of business activities
- Owner/operator information including emergency contacts
- The type and quantity of reportable hazardous materials
- Site map
- Emergency response procedures
- Employee training program

a) Routine Transport, Use, or Disposal of Hazardous Materials / Upset and Accident Condition

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HAZ-1) concluded that implementation of the SSF 2040 General Plan would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.[56]

New development could result in an increase in the routine transportation, use, and disposal of hazardous materials, and development in the Business Technology Park, Business Technology Park High, Mixed Industrial, Mixed Industrial High, and Industrial Transition Zone were identified as land use designations that have the greatest potential to generate hazardous materials. During construction activities, commercially available hazardous materials (e.g., fuels, solvents, paints, some consumer electronics) would be used, which may generate small amounts of hazardous waste. Demolition of existing structures could potentially result in the release of hazardous building materials (e.g., asbestos, lead paint, etc.). The General Plan EIR determined that all new development would be required to comply with mandatory regulations for hazardous materials adopted by the USEPA, Occupational Safety and Health Administration (OSHA), U.S. Department of Transportation (USDOT), DTSC, Caltrans, California Highway Patrol (CHP), local Certified Unified Program Agency (CUPA), and Bay Area Air District. Businesses handling or storing hazardous materials over threshold quantities are required to submit an HMBP to the local CUPA. The South San Francisco Fire Department (SSFFD) and City Building Division coordinate review of building permits to ensure hazardous materials requirements are met prior to construction. Any businesses that generate or use hazardous materials are also subject to existing hazardous materials regulations as implemented by the local CUPA. The CUPA and SSFFD also conduct inspections for fire safety and hazardous materials management. Businesses storing or handling hazardous materials over threshold quantities are required to submit HMBPs pursuant to federal, state, and local regulations. These HMBPs must include measures for safe storage, use, and handling of hazardous materials, along with a contingency plan that describes the facility's response procedures in the event of a hazardous materials release.

The General Plan EIR found that the transportation of hazardous materials on local roadways and along railways is regulated and monitored by multiple agencies. These agencies enforce federal and state regulations regarding transportation of hazardous materials and respond to hazardous material spills and releases that occur. If an accident were to occur during transport of hazardous materials, the CUPA, SSFFD, and South San Francisco Police Department (SSFPD) would respond. As noted, the CHP conducts regular inspections of licensed transporters to assure regulatory compliance and responds to hazardous materials emergencies on roadways.

The disposal of hazardous materials is regulated and monitored by the City (SSFMC Chapter 8.20 [Illegal Disposal of Discarded Items and Waste Matter and Illegal Littering]), local CUPA, SSFFD, California Division of Occupational Safety and Health (Cal/OSHA), and the DTSC, consistent with the requirements of federal, state, and local regulations and policies.

The General Plan EIR concluded that future projects would be subject to environmental analysis at the time a specific project is defined. In reviewing individual project applications, the City would determine which SSF 2040 General Plan policies and Zoning Ordinance chapters apply, depending on the specific characteristics of the project type and/or project site. While development envisioned by the SSF 2040 General Plan could result in an increase in the transportation, use, and disposal of hazardous materials,

[56] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HAZ-1, p. 3.8-24

future projects would be required to comply with requirements and regulations of the City, USEPA, OSHA, USDOT, DTSC, Caltrans, CHP, local CUPA, and Bay Area Air District. The General Plan EIR concludes that, following implementation of these policies, impacts to the transportation, use, and disposal of hazardous materials will be less than significant.

PROJECT ANALYSIS

Construction

Construction activities associated with the proposed Project will involve the use of heavy equipment using fuels and oils and the use of other products such as concrete, paints, and adhesives. Such hazardous materials will be stored, used, and transported in varying amounts during construction.

The Construction General Permit regulates stormwater management at construction sites, and the SWPPP prevents the discharge of pollutants to surface waters or groundwater. With implementation of these regulatory requirements, construction activities would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or through a reasonably foreseeable upset or accident condition involving the release of hazardous materials into the environment. There is nothing unusual about the proposed Project's construction activities or material-handling practices that would result in hazardous materials risks beyond those evaluated in the General Plan EIR. Therefore, with compliance with applicable state and local regulations, impacts related to hazardous materials during construction would be less than significant. **(Less than Significant)**

Operation

The proposed Project's new buildings are intended as classroom spaces and would likely involve the use of common commercial hazardous materials such as cleaners, disinfectants, and solvents. In addition, routine landscaping and maintenance of other site components, including outdoor play areas, parking lots, and landscaped buffers, may involve the limited use of fertilizers, herbicides, and pesticides. These materials would be stored, used, and transported in small quantities consistent with manufacturer specifications and in accordance with applicable federal, state, and local regulations. Proper handling and storage procedures, including secure storage areas and compliance with product labeling and reporting requirements, would ensure that these materials do not pose a substantial risk to public health or the environment, and impacts would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to comply with all applicable federal, state, County, and City regulations related to the transport, use, and disposal of hazardous materials. These regulations control the use of hazardous materials to minimize the risk of exposure of children and the public to substantial adverse effects related to the routine transport, use, or disposal of hazardous materials to a level of less than significant (CEQA Checklist Question 5.IX.a), and no mitigation is required.

b) Hazardous Materials Upset Risk

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (impact HAZ-2) concluded that implementation of the SSF 2040 General Plan would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment.[57]

The General Plan EIR found that compliance with mandatory regulations would reduce all potential construction-related impacts to a less-than-significant level, and that those laws will be enforced at all construction sites. Additionally, future development must comply with the California Code of Regulations, which establishes Cal/OSHA requirements related to public and worker protection. The local CUPA is responsible for ensuring that the California Code of Regulations and all other programs related to hazardous materials are implemented. The General Plan EIR concludes that, following implementation of these policies, impacts regarding hazardous materials will be less than significant..

PROJECT ANALYSIS

During operation, the proposed Project would involve the routine use and storage of small quantities of common commercial products, including cleaning supplies, disinfectants, paints, solvents, and maintenance-related materials. In addition, landscaping activities would require the limited use of fertilizers, herbicides, and pesticides for vegetation management. These substances are typical for educational and recreational facilities and would be handled in accordance with manufacturer specifications and applicable federal, state, and local regulations governing the storage, handling, and transportation of hazardous materials.

With compliance with these mandatory regulatory requirements—including those enforced by the DTSC, SMCEHD, and Cal/OSHA—operational activities would not create a significant hazard to the public or the environment through a reasonably foreseeable upset or accident condition involving the release of hazardous materials. Therefore, operational impacts related to the use, storage, and disposal of hazardous materials would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to comply with all applicable federal, state, County, and City regulations related to the transport, use, and disposal of hazardous materials. These regulations control the use of hazardous materials to minimize the risk of exposure of upset and accident conditions involving release of hazardous materials into the environment (CEQA Checklist Question 5.IX.b) to a level of less than significant, and no mitigation is required**.**

c) Hazardous Emissions Near a School

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (impact HAZ-3) concluded that implementation of the SSF 2040 General Plan would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. [58]

[57] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HAZ-2, p. 3.8-26

[58] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HAZ-3, p. 3.8-28

As discussed in the General Plan EIR, it is possible that future development and redevelopment projects will involve hazardous emissions or handle hazardous materials and waste that may occur within 0.25 mile of an existing or future school. However, such projects would be required to comply with existing federal, state, and local regulations related to hazardous materials. In particular, the SSFFD and City Building Division coordinate their review of building permits to ensure hazardous materials requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses and proper hazardous materials storage facilities. Future development would be required by the local CUPA to store, manage, and dispose of the materials in accordance with the Unified Program. The General Plan EIR concludes that, following implementation of these policies, impacts regarding hazardous emissions near a school will be less than significant.

PROJECT ANALYSIS

The purpose of the proposed Project is to expand an existing preschool. As such, Project construction, and the associated use, transport, and storage of hazardous materials such as fuels, oils, paints, and solvents, would occur within 0.25 mile of the existing preschool operation and Westborough Middle School, located immediately west of Westborough Park. The proposed Project would be required to comply with applicable federal, state, and local regulations for hazardous materials management, including California Health and Safety Code Chapter 6.95 (Hazardous Materials Business Plan requirements), and oversight by the CUPA administered locally by the SSFFD.

Adherence to these regulatory provisions would ensure that hazardous materials are stored, labeled, and handled in compliance with safety protocols, including containment and secondary spill prevention. The City Building Division would also review building permits and confirm compliance with hazardous materials storage, ventilation, and fire protection standards prior to construction. With implementation of these mandatory measures and oversight by the SSFFD, potential releases of hazardous materials would be prevented or promptly controlled.

Compliance with existing federal, state, and local hazardous materials regulations and the Unified Program requirements, impacts related to potential exposure of nearby sensitive receptors to hazardous materials would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the General Plan EIR, the proposed Project's effects related to hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school (CEQA Checklist Question 5.IX.c) would be less than significant, and no mitigation is required.

d) Cortese List / Known Hazardous Conditions at the Site

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HAZ-4) concluded that development facilitated by the SSF 2040 General Plan could occur on a contaminated site, but that such sites will be evaluated for Project-specific impacts related to hazardous materials at the time they are proposed. Any development on a contaminated site would be required to comply with mandatory regulations to ensure it does not create a significant hazard to the public or the environment. [59]

[59] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HAZ-4, p. 3.8-29

If hazardous materials are known or encountered during construction activities, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations set forth by the City, County, San Francisco RWQCB, DTSC, USEPA, local CUPA, and Bay Area Air District. In reviewing individual project applications, the City would determine which SSF 2040 General Plan policies and regulations apply, depending on the specific characteristics of the project type and/or project site during the development review process. Therefore, the General Plan EIR concludes that, following implementation of these policies, impacts to contaminated sites will be less than significant.

PROJECT ANALYSIS

Cortese List

Hazardous materials sites compiled pursuant to California Government Code Section 65962.5 are known as the "Cortese List." The Cortese List is comprised of identified sites with suspected and/or confirmed releases of hazardous materials to the sub-surface soil and/or groundwater, and is a compilation of data from the following sources:

- The DTSC portion of the Hazardous Waste and Substances Sites List, available on the DTSC EnviroStor database;
- The California State Water Resources Control Board (State Water Board)/or San Francisco RWQCB list of leaking underground storage tanks (LUSTs), underground storage tanks (UST), and Spills, Leaks, Investigations and Cleanup (SLIC) sites as listed on the State Water Board GeoTracker database;
- Solid waste disposal sites identified by the State Water Board with waste constituents above hazardous waste levels outside the waste management unit;
- "Active" Cease and Desist Order (CDO) and Cleanup and Abatement Order (CAO) sites from the State Water Board; and
- Hazardous waste facilities subject to corrective action pursuant to California Health and Safety Code Section 25187.5, as identified by DTSC and listed on the EnviroStor database

The Project site is not located on or in the vicinity of any listed sites on the Cortese List according to the DTSC EnviroStor database. [60] **(No Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to comply with all applicable federal, state, County, and City regulations related to development of a contaminated (or previously contaminated) site. The Project site is not included on any list of hazardous materials sites compiled pursuant to California Government Code Section 65962.5 and would not create a significant hazard to the public or the environment (CEQA Checklist Question 5.IX.d), and no mitigation is required.

[60] California Department of Toxic Substances Control (DTSC). 2025. EnviroStor Database: Hazardous Waste and Substances Site List (Cortese List). Available at: https://envirostor.dtsc.ca.gov. Accessed November 2025.

e) Airport-Related Safety or Excessive Noise Hazards

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HAZ-5) found that the city is located within the Federal Aviation Administration (FAA) Part 77 Sphere of Influence and within the boundaries of SFO Airport Influence Areas (AIA). Within the AIA (Area B), the San Mateo City/County Association of Governments (C/CAG) Airport Land Use Committee (ALUC) is responsible for reviewing proposed land development proposals. Depending on location, future development pursuant to the SSF 2040 General Plan could expose people to safety hazards or excessive noise because of proximity to SFO. In accordance with the SFO ALUCP, [61] the City would consult with the C/CAG and FAA when development applications for subsequent development in the vicinity of SFO are received, minimizing the exposure of people residing or working in the city to a safety hazard or excessive noise because of proximity to SFO. The General Plan EIR determined this effect to be less than significant.[62]

PROJECT ANALYSIS

The Project site is located approximately 2.5 miles west of SFO and lies within the jurisdictional area of the SFO ALUCP. Although the Project site is located within the overall airport land use planning area, it is not situated within any of the five designated SFO safety zones that restrict certain land uses due to potential aircraft overflight risks. Safety zones are defined in the SFO ALUCP based on accident probability and exposure criteria, with the most restrictive zones located adjacent to the runway ends. Because the Project site is located outside these zones, no aircraft-related safety risk to site users would occur.

Similarly, the Project site is not located within any SFO ALUCP-identified noise impact areas, which are limited to areas where aircraft noise exposure exceeds the 65-decibel (dB) Community Noise Equivalent Level (CNEL). Therefore, the SFO ALUCP's land use noise exposure criteria do not apply to the proposed Project.

The proposed Project uses are consistent with existing land uses and would not alter the level or type of public exposure to potential airport-related hazards. Accordingly, the Project would not expose people to a significant safety hazard or excessive noise related to SFO operations, and impacts would be less than significant**. (Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not expose people to aviation safety hazards or excessive noise (CEQA Checklist Question 5.IX.e), and no impact related to airport safety hazards would occur.

[61] City/County Association of Governments of San Mateo County (C/CAG), *Consolidated Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport,* 2012.

[62] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HAZ-5, p. 3.8-30

f) Interference with Emergency Response Plan or Emergency Evacuation Plan

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HAZ-6) determined that implementation of the SSF 2040 General Plan would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. In the event of an evacuation, major freeways (including I-280 and US 101) can be used, and if major freeways are not available, potential alternative emergency evacuation routes include SR-82, Sister Cities Boulevard, Junipero Serra Boulevard, and East Grand Avenue. Buildout pursuant to the SSF 2040 General Plan was not found to materially overburden any designated evacuation route or substantially impair any emergency response plans or emergency evacuation plans. Most of the development facilitated by the SSF 2040 General Plan would be served by existing emergency evacuation routes, which have sufficient capacity to accommodate projected growth. Given the existing interjurisdictional programs that are already in place, and the City's focus on maintaining and enhancing emergency management capacity and evacuation routes to protect life and property in the event of emergency, this impact was found to be less than significant.[63]

PROJECT ANALYSIS

The Project site is already developed and currently operates as a preschool and public park. The proposed Project would relocate and expand preschool operations within the northern portion of the Project site, while maintaining the existing access configuration. Emergency vehicle access would continue to be provided via Galway Drive from Westborough Boulevard, using the existing driveway and circulation pattern that connects to the shared parking lot. In the event of an emergency, vehicles would continue to use established routes, which connect to Westborough Boulevard, that provide direct connections to I-280 and Junipero Serra Boulevard.

The proposed Project would include the reconfiguration of the existing parking lot but would not alter external access points or restrict emergency ingress or egress. As discussed in the Section 5.XVI, *Transportation*, the proposed Project would not result in any significant impacts on circulation patterns, geometric design, or roadway safety. The Project plans also demonstrate that emergency vehicles would maintain adequate access throughout the Project site.

Because the proposed Project would not modify existing evacuation routes, obstruct emergency response access, or introduce new hazards affecting emergency management, impacts on emergency response and evacuation plans would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan (CEQA Checklist Question 5.IX.f), and this impact is considered less than significant.

g) Wildland Fires

See Section 5.XIX, *Wildfire*, of this CEQA Checklist for a full discussion of this topic.

[63] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HAZ-6, p. 3.8-32

CEQA Conclusion Pertaining to Hazards and Hazardous Materials

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts related to hazards or hazardous materials as identified in that Program EIR. The proposed Project would not result in new significant impacts related to hazards and hazardous materials that were not previously identified. The General Plan EIR identified regulatory requirements that would apply to the proposed Project, and no new mitigation measures would be needed. No further environmental review of the proposed Project pertaining to the topics of hazards and hazardous materials is required.

X. Hydrology and Water Quality

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during project operations?	LTS	■	□	SSFMC 14.04	LTS
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	LTS	■	□	–	LTS
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation, substantially increase the rate or amount of surface runoff in a manner which would result in flooding, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or impede or redirect flood flows?	LTS	■	□	–	LTS
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	LTS	■	□	–	LTS
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	■	□	–	LTS

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to hydrology and water quality resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to hydrology and water quality are avoided, minimized, or reduced to a less-than-significant level.

SSFMC Chapter 14.04: Stormwater Management and Discharge Control: Whereas the proposed Project is a redevelopment project that creates and/or replaces 5,000 square feet or more of impervious surface, the proposed Project is subject to Provision C.3 of the MRP. In South San Francisco, these NPDES MRP requirements are primarily implemented pursuant to the City's Stormwater Management

and Discharge Control Ordinance (SSFMC Chapter 14.04).[64] The following regulatory requirements apply to the proposed Project and are intended to prevent stormwater pollution during operations, and to provide for compliance with federal and state regulations:

1. Pursuant to SSFMC Section 14.04.134 (Low Impact Development (LID) Requirements), the proposed Project shall implement Low Impact Development (LID) requirements as specified in NPDES Permit No CAS612008 (the MRP) to reduce runoff, mimic the Project site's pre-development hydrology, and treat stormwater. LID may include preserving and recreating natural landscape features and minimizing imperviousness to create functional and appealing site drainage that treats stormwater as a resource. Practices used to adhere to these LID principles include measures such as rain barrels and cisterns, green roofs, permeable pavement, preserving undeveloped open space, and biotreatment through rain gardens, bioretention units, bioswales, and planter/tree boxes.
2. Pursuant to Section 14.04.133 (Site Design and Stormwater Treatment Requirements for Regulated Projects), the proposed Project shall implement site design and stormwater treatment requirements for regulated projects to 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 onto vegetated areas
    - Direct runoff from sidewalks, walkways, and/or patios onto vegetated areas
    - Direct runoff from driveways and/or uncovered parking lots onto vegetated areas
    - Construct sidewalks, walkways, and/or patios with permeable surfaces
    - Construct driveways, bike lanes, and/or uncovered parking lots with permeable surfaces
3. Pursuant to Section 14.04.180(g), the proposed Project shall implement source control measures consistent with the NPDES MRP, including:
    - Storm drain stenciling—No Dumping-Flows to Bay
    - Landscaping that minimizes irrigation and runoff, promotes surface infiltration where possible, minimizes the use of pesticides and fertilizers, and incorporates appropriate sustainable landscaping practices and programs such as Bay-Friendly Landscaping
    - Appropriate covers, drains, and storage precautions for outdoor material storage areas, loading docks, repair/maintenance bays, and fueling areas
    - Covered trash, food waste, and compactor enclosures
    - Plumbing certain discharges to the sanitary sewer, subject to the local sanitary sewer agency's authority and standards
4. Pursuant to Section 20.310.002(C) (Drainage), the Project must prepare drainage plans for any alterations of the slope or contour of the site's existing drainage pattern in a manner that can assist in protecting water quality during operation.

Storm Water Pollution Prevention Plan: Whereas the proposed Project is subject to the state's Construction General Permit and NPDES requirements, the Project applicants shall submit and implement a SWPPP for each phase of construction, developed pursuant to the Construction General Permit. The Project applicant must prepare a SWPPP and implement inspection, monitoring, and reporting requirements appropriate to the proposed Project's risk level as specified in the SWPPP. The SWPPP shall include:

[64] City of South San Francisco. 2025. *City of South San Francisco Municipal Code: Title 14 Water and Storage, Chapter 14.04 Stormwater Management and Discharge Control.* Available at: https://ecode360.com/43447251. Accessed November 2025.

- A site map
- A description of construction activities and potential pollutants
- BMPs that will be employed to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources, such as petroleum products, solvents, paints, and cement
- All NPDES permits also have inspection, monitoring, and reporting requirements

SSFMC Chapter 14.04.180(d): Erosion Control: The proposed Project will comply with NPDES requirements for erosion and sediment control, an NOI will be filed with the State Water Board, and a Project-specific SWPPP will be prepared and implemented. The proposed Project would not disturb any natural waterbodies or drainage systems, slopes, channels, or natural areas. The Project site is not located within the Flood Plain/SLR Overlay District and is not on a site with a natural slope of 15% or greater. SSFMC regulations pertaining to such sites would not apply.

a) Water Quality

GENERAL PLAN EIR CONCLUSIONS

Construction

The General Plan EIR (Impact HYD-1) concluded that implementation of the SSF 2040 General Plan would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during construction.[65]

Future development (including redevelopment of existing developed sites) that disturbs 1 acre or more of soil or that is part of a common plan of development that disturbs 1 acre or more of soil must obtain permit coverage under the Construction General Permit by filing an NOI and SWPPP with the RWQCB prior to commencement of construction. The SWPPP must describe the Project site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

The SSF 2040 General Plan includes policies and actions to protect water quality during project construction, and SSFMC contains rules and regulations to protect water quality during construction. SSFMC Section 14.04.180 (Reduction of Pollutants in Stormwater) identifies construction-related BMPs to reduce pollutants entering the City storm sewer system, Section 14.04.132 (Site Design Measures for Non-Regulated Projects) and Section 14.04.133 (Site Design and Stormwater Treatment Requirements for Regulated Projects) require all new development and redevelopment projects to minimize disturbance of natural waterbodies and drainage systems, protect slopes and channels, and conserve natural areas, including existing trees, other vegetation, and soils. Section 20.180.005 (Development Standards) includes standards for the Flood Plain/SLR Overlay District, including a bay access buffer, creek access buffers, using living vegetation and natural materials for levees and sea walls, employing low-impact stormwater runoff techniques, retaining 100% of drainage from impervious surfacing on-site, using a minimum of 80% native species in landscaping, requiring no net new impervious areas, and requiring the installation of fencing during construction to protect riparian areas. These regulations will assist in protecting water quality during construction. Section 20.310.002 (General Site Design and Building

[65] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HYD-1, p. 3.9-27

Standards) includes grading and drainage requirements for all projects throughout the city, including submittal of a grading plan for any grading on a site with a natural slope of 15% or greater, and slope stabilization to control against erosion, which will also assist in protecting water quality during construction.

The General Plan EIR concluded that compliance with mandatory NPDES permit requirements, adherence to SSFMC requirements, and implementation of SSF 2040 General Plan policies and actions would ensure that impacts related to water quality degradation from construction activities would be less than significant.

Dewatering

The General Plan EIR found that construction activities associated with future development, including excavation and trenching, may encounter shallow groundwater, and if shallow groundwater is encountered, dewatering of the excavation or trenching site may be required. In accordance with the *General Waste Discharge Requirements for Extracted Groundwater from Structural Dewatering Requiring Treatment in the San Francisco Bay Region* (Order #R2-2018-0026: General NPDES Permit No. CAG912004), any contaminated groundwater must be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Discharges of dewatered groundwater to a storm drain must be conducted in a manner that complies with the San Francisco Bay RWQCB Order #R2-2015-0049, MRP. Consistent with the California Water Code and Clean Water Act, SSFMC Section 14.08.290 (Harmful Discharges) regulates excessive, accidental, and harmful discharges. In addition, SSFMC Chapter 14.08 (Water Quality Control) provides for the regulation of direct and indirect dischargers to the publicly owned treatment works through the issuance of permits for certain non-domestic users and through enforcement of general requirements for all users.

Compliance with mandatory NPDES permit requirements and adherence to the SSFMC would ensure that impacts related to water quality degradation from the discharge of dewatered groundwater would be less than significant.

Operation

The General Plan EIR (Impact HYD-1) concluded that implementation of the SSF 2040 General Plan would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality during operations.[66]

New development pursuant to the SSF 2040 General Plan would add additional areas of impervious surface and could increase the volume of pollutants that are typically associated with urban runoff into the stormwater. These pollutants can include sediments, petroleum hydrocarbons, pesticides, fertilizers, and heavy metals such as lead, zinc, and copper. Precipitation washes away most of these pollutants, resulting in high pollutant concentrations in the initial wet weather runoff. The amount and type of runoff generated by future projects could potentially be greater than under existing conditions. An increase in impervious surfaces could result in a corresponding increase in urban runoff pollutants and first flush roadway contaminants, as well as an increase in nutrients and other chemicals from landscaped areas. These constituents could result in water quality impacts to on- and off-site drainage flows to area waterways.

The SSF 2040 General Plan includes policies and actions intended to protect water quality in and around the GP Planning Area. The SSFMC also contains rules and regulations to protect water quality during operation. The 2022 SSF CAP also includes actions that would protect water quality during operation.

[66] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HYD-1, starting at p. 3.9-29

Future development pursuant to the SSF 2040 General Plan would also be required to comply with the Clean Water Act and regulations enforced by the RWQCB. With implementation of all regulatory requirements, the General Plan EIR found that future development pursuant to the SSF 2040 General Plan would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As such, implementation of the SSF 2040 General Plan was found to result in a less-than-significant impact relative to water quality during operation.

PROJECT ANALYSIS

Construction

Project construction would involve grading, excavation, and removal of existing paved surfaces, buildings, and vegetative cover that could result in runoff containing sediment and other pollutants. Sources of potential pollution associated with construction include fuel, grease, oil, and other fluids; concrete material; sediment; and litter. These pollutants could degrade surface or groundwater quality if not properly controlled. However, groundwater was not encountered during the geotechnical subsurface investigation, and the Project's 2-foot depth of excavation is not expected to intersect groundwater or require dewatering. Therefore, the potential for contamination of groundwater during construction is not reasonably foreseeable.

The Project footprint is approximately 0.65 acre, which is below the 1-acre threshold for coverage under the State Water Board's Construction General Permit. Nonetheless, the proposed Project would comply with City stormwater management regulations and implement BMPs consistent with SSFMC Chapter 14.04 (Stormwater Management and Discharge Control), including containment of fuels and chemicals, erosion and sediment controls, and spill response.

With adherence to these existing regulatory requirements, which require the proper storage, handling, and disposal of construction materials and wastes, potential discharges of pollutants or groundwater contamination would be avoided. Accordingly, impacts related to soil or groundwater contamination during construction would be less than significant**. (Less than Significant)**

Operation

The proposed Project would increase the total impervious surface area within the project's area of disturbance from approximately 5,100 square feet to 20,198 square feet, resulting in a net increase of approximately 14,568 square feet. This increase in impervious area has the potential to increase the volume of stormwater runoff and the associated pollutant load typically present in urban runoff unless properly treated prior to discharge into the City's storm drain system. Although the Geotechnical Report (see Appendix B) identified that groundwater was not encountered during subsurface exploration, and the Project site is not located within an identified groundwater basin, stormwater contaminants could still affect downstream waterways, including San Francisco Bay, if uncontrolled.

Consistent with the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) and the MRP Provision C.3 requirements, the proposed Project has been designed to treat 100% of all new and replaced impervious surfaces. The proposed Project incorporates multiple distributed bioretention facilities, each lined and equipped with underdrains, and sized using the MRP Provision C.3 flow-based method (0.2 inches/hour). Runoff from all impervious areas would be routed through these bioretention areas before entering the existing storm drain system. These LID features provide sedimentation, filtration, and pollutant removal, ensuring that post-construction runoff does not exceed pre-project pollutant loads or degrade downstream water quality.

In addition, the proposed Project would comply with City stormwater management requirements and SSFMC Chapter 14.04, which mandate erosion and sediment control BMPs, secondary containment for fuels, spill prevention and response measures, and proper materials handling during construction. Together with compliance with SMCWPPP/MRP standards, these measures ensure that both construction-related and operational stormwater are effectively managed and treated. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project's effects related to potential violations of water quality standards or waste discharge requirements, or otherwise substantially degrading surface or groundwater quality during construction (CEQA Checklist Question 5.X.a) will be fully addressed through implementation of existing regulations, and this impact would be reduced to less than significant.

b) Groundwater Supplies and Groundwater Recharge

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HYD-2) concluded that new development pursuant to the SSF 2040 General Plan would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge, and the SSF 2040 General Plan would not impede sustainable groundwater management of the basin. [67]

Development pursuant to the SSF 2040 General Plan could lead to an increased demand for water, which could lead to an increase in groundwater pumping. Subsequent development pursuant to the SSF 2040 General Plan could also result in an increase in impervious surfaces, which could reduce stormwater and rainwater infiltration. The SSF 2040 General Plan includes policies and actions to maximize infiltration and rainwater retention and minimize impacts to groundwater recharge. The SSFMC also contains rules and regulations to maximize stormwater infiltration and rainwater retention and minimize impacts to groundwater recharge. Future development pursuant to the SSF 2040 General Plan would be required to comply with requirements of the SSFMC and Zoning Ordinance, and the SSF 2040 General Plan and 2022 SSF CAP policies and actions related to maximizing infiltration and rainwater retention. Therefore, future development pursuant to the SSF 2040 General Plan was not found to substantially interfere with groundwater recharge or impede groundwater management of the basin, and this impact was determined to be less than significant.

PROJECT ANALYSIS

The Project site is already developed with park and recreational facilities, paved surfaces, and landscaped areas. According to the Geotechnical Report, groundwater was not encountered within 36 feet below ground surface, and the Project site is not underlain by an active or managed groundwater basin.[68] Therefore, no groundwater wells are present or proposed, and no direct withdrawal of groundwater would occur as part of the Project. The Project site is served by the WWD, which supplies water to the Westborough area of South San Francisco and would serve the Project site.

[67] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HYD-2, p. 3.9-31

[68] The Water Foundation. 2025. Groundwater Exchange: A Project of the California Water Library. Available at: https://groundwaterexchange.org/. Accessed October 2025.

The Project site is currently developed with a mixture of open space and impervious surfaces. At the completion of project construction, the Project site will consist of approximately 4.6% impervious surfaces, a minor increase for the current 2.5% coverage that exists today. Because on-site stormwater treatment features (e.g., bio-filtration planters, pervious pavers, and flow-through planters) will capture and infiltrate runoff to the extent feasible, the potential for interference with groundwater recharge is minimal.

The proposed Project does not require the construction of additional wells or other sources of water. Because the Project would not involve groundwater extraction, dewatering, or activities that impede recharge, and because stormwater would continue to infiltrate through landscaped and pervious areas, the Project would not substantially deplete groundwater supplies or interfere with groundwater recharge. Additionally, the Project would comply with City of South San Francisco stormwater management requirements and Provision C.3 of the San Francisco Bay Regional Municipal Regional Stormwater Permit (NPDES), which mandates that post-construction stormwater be managed on-site to reduce runoff volume and promote infiltration where feasible. Therefore, the proposed Project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and would have less-than-significant impacts related to groundwater. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the Project's effects related to decreasing groundwater supplies or interfering substantially with groundwater recharge such that the Project would not impede sustainable groundwater management of the basin (CEQA Checklist Question 5.X.b) and no mitigation is required.

c) Alter Existing Drainage Patterns

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HYD-3) concluded that new development pursuant to the SSF 2040 General Plan could substantially alter the existing drainage pattern of the area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which could result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows.[69]

Development pursuant to the SSF 2040 General Plan encourages infill development and discourages development on hillsides. However, new development or redevelopment that would be allowed under the SSF 2040 General Plan could increase the total impervious area and increase stormwater runoff. Increased stormwater runoff could result in flooding, could exceed stormwater drainage facility capacity or create additional sources of polluted runoff (see CEQA Checklist Question 5.X.a).

However, implementation of SSF 2040 General Plan and 2022 SSF CAP policies and adherence to the requirements of the SSFMC and Zoning Ordinance would maximize the on-site infiltration capacity for new development and redevelopment projects and would minimize the off-site runoff that would leave those project sites. Compliance with existing regulations and the SSF 2040 General Plan policies would maximize stormwater infiltration and rainwater retention, which would in turn reduce stormwater runoff. Therefore, impacts related to surface water and flooding were found to be less than significant.

[69] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HYD-3, p. 3.9-33

PROJECT ANALYSIS

The proposed Project includes demolition of the existing structures on-site and tree removal, and the construction of a new preschool facility, public restroom, and ancillary facilities. While the proposed Project would replace existing structures and impervious areas, it would also relocate some impervious surfaces and modify site grading to accommodate the new building footprint. These changes would slightly alter on-site drainage patterns. However, the analysis below demonstrates that such alterations would not result in any significant hydrologic or water quality impacts.

Erosion or Siltation

During Project construction, potential erosion or sedimentation would be minimized through implementation of the Construction General Permit requirements, which require erosion and sediment control BMPs such as silt fencing, fiber rolls, inlet protection, and stabilized construction entrances. After Project construction, all disturbed areas would be stabilized through paving, landscaping, or permanent biofiltration planters. As a result, the proposed Project would not result in substantial erosion or siltation on or off site.

On- or Off-Site Flooding

The Project site is currently developed with impervious surfaces and connected to the City's storm drain system. The proposed Project would not increase total impervious surface area in a manner that would substantially change stormwater runoff. Stormwater management facilities, including flow-through planters, pervious pavers, and biofiltration areas, would detain and treat runoff prior to discharge. Therefore, the proposed Project would not cause on- or off-site flooding.

Runoff Capacity or Polluted Runoff

The proposed Project would comply with the Municipal Regional Stormwater NPDES Permit (Provision C.3) and the City's Stormwater Management Ordinance, requiring all post-construction runoff from impervious surfaces to be treated on site. The Project proposes to treat 100% of the Project site's impervious areas through payment of in-lieu fees or through bio-retention areas designed to remove sediment, nutrients, oils, and other urban pollutants. Therefore, the proposed Project would not exceed the capacity of the storm drain system or generate substantial polluted runoff.

Impeding or Redirecting Flows

The Project site is not located within a Federal Emergency Management Agency (FEMA)-designated 100-year floodplain, as shown on FEMA Flood Insurance Rate Map (FIRM) No. 06081C0017E (Figure 5-1, *FEMA Flood Insurance Rate Map*).[70] No structures or grading would occur within a natural drainage channel or floodway. Therefore, the proposed Project would not impede or redirect flood flows.

[70] Federal Emergency Management Agency (FEMA). 2019. *Flood Insurance Rate Map, San Mateo County, California, and Incorporated Areas, Panel No. 06081C0017E*. Map revised April 5, 2019. Accessed November 2025.

Figure 5-1. FEMA Flood Insurance Rate Map

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project would incorporate BMPs and LID standards into the Project design, thereby ensuring that the proposed Project does not result in a significant net increase in surface runoff. Therefore, the proposed Project would not substantially alter the existing drainage patterns of the Project site or area in a manner which would result in substantial erosion or siltation, substantially increase the rate or amount of surface runoff, exceed the capacity of existing or planned stormwater drainage systems, or impede or redirect flood flows (CEQA Checklist Question 5.X.c).

d) Flood and Tsunami Hazards

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HYD-4) concluded that implementation of the SSF 2040 General Plan could lead to new development being located in a flood hazard or tsunami zone, and could risk release of pollutants due to project inundation.[71] Some areas of the city are located within the 100-year flood zone (primarily along Colma Creek, the Navigable Slough, San Bruno Creek, and San Francisco Bay), and some areas of the GP Planning Area are located within the 0.2% annual chance flood hazard, or the "500-year flood zone," (primarily within the East of 101 and Lindenville planning subareas). Portions of the city that are low-lying are also susceptible to inundation by tsunami. These areas are primarily on the eastern side of the city and adjacent to San Francisco Bay.

The General Plan EIR determined that subsequent development, infrastructure, and planning projects would be subject to SSF 2040 General Plan policies and actions and SSFMC and Zoning Ordinance requirements, which reduce the risks of flooding to City residents and properties. Furthermore, federal and state agencies, including the U.S. Army Corps of Engineers (USACE) and BCDC are responsible for maintaining flood protection features in the city. Therefore, the General Plan EIR concluded that the potential for loss, injury, or death from impeding flood flows would be reduced to a less-than-significant level. Similarly, the General Plan EIR concluded that the risk of release of pollutants due to inundation would also be less than significant.

PROJECT ANALYSIS

Flood Hazards

According to FEMA FIRM Panel No. 06081C0017E (effective April 5, 2019), the Project site is located outside of the 100-year floodplain (Zone X) and is not within a designated Special Flood Hazard Area (SFHA) (see Figure 5-1, *FEMA Flood Insurance Rate Map*). The nearest floodplain associated with Colma Creek is located approximately 1.5 miles east of the Project site. Therefore, the Project area is not subject to inundation during a 100-year flood event. As demonstrated on General Plan EIR Exhibits 3.9-2 and 3.9-4, the Project site is not located within a 100-Year Flood Hazard Zone (1% Annual Chance Flood Hazard) or a 500-Year Flood Hazard Zone (2% Annual Chance Flood Hazard).

The proposed improvements would occur entirely within a previously developed park site and would not involve work within a stream, channel, or floodway. Drainage infrastructure, including curb inlets and underground storm drains, would maintain existing flow directions toward the municipal storm drain system along Galway Drive and Westborough Boulevard.

[71] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact HYD-4, p. 3.9-38

Because the proposed Project would not alter topography in a manner that would divert stormwater flows or place structures within a flood-prone area, it would not impede or redirect flood flows. The proposed Project's stormwater management design incorporates on-site treatment BMPs (biofiltration planters, flow-through planters, and pervious paving) that would moderate peak flows and further reduce the potential for localized flooding.

Tsunami Hazards

The Project site is well inland and elevated at approximately 409 to 430 feet above MSL. According to the California Geological Survey's Tsunami Hazard Area Map for San Mateo County, [72] the Project site is located far outside the modeled tsunami inundation zone. Given its substantial elevation and inland location, the Project site has no reasonable potential for tsunami inundation, and tsunami exposure would be negligible. The proposed Project would store only routine quantities of common cleaning and maintenance chemicals and would be required to implement stormwater treatment and runoff-management best practices that prevent the release of hazardous materials during extreme events. For these reasons, tsunami-related impacts would be less than significant.

Seiche Hazards

The geotechnical investigation for the Project site indicates that seiches are not a design consideration, as there are no large, nearby impounded waterbodies (such as lakes or reservoirs) whose oscillation could affect the Project area. In addition, the Project site is located well inland and at an elevation of approximately 409 to 430 feet above MSL, and its substantial distance from San Francisco Bay eliminates the potential for seiche-related inundation from bay waters. Together, these conditions demonstrate that seiche hazards at the Project site are negligible.

Because the Project site is not located near any impounded waterbody capable of generating seiche effects and is situated at a high elevation far from San Francisco Bay, the potential for inundation due to seiches is exceedingly low. As discussed in Section 5.IX, *Hazards and Hydrology*, of this CEQA Checklist, the proposed Project would store only routine quantities of cleaning and maintenance materials and is required to implement site-wide stormwater treatment and runoff-management best practices, which would prevent the release of hazardous materials during extreme events. Accordingly, impacts related to seiche hazards would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project would not pose significant impacts related to inundation hazards, including flood hazard, tsunami, or seiche zones, or risk release of pollutants due to Project inundation (CEQA Checklist Question 5.X.d). Therefore, impacts would be less than significant, and no mitigation is required.

[72] California Geological Survey (CGS). 2021. *Tsunami Hazard Area Map: San Mateo County, California*. California Department of Conservation. Available at: https://www.conservation.ca.gov/cgs/tsunami/maps. Accessed November 2025

e) Conflict with Water Quality Control Plan or Sustainable Groundwater Management Plan

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact HYD-5) concluded that implementation of the SSF 2040 General Plan would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

Development facilitated by the SSF 2040 General Plan would be required to comply with the Clean Water Act, SSF 2040 General Plan, SSFMC and Zoning Ordinance, and mandatory NPDES permit requirements. Therefore, future development would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, in compliance with the San Francisco Bay Basin Plan, and implementation of the SSF 2040 General Plan was found to result in a less-than-significant impact.

Additionally, the SSF 2040 General Plan contains several policies and actions that would facilitate groundwater recharge by encouraging pervious surfaces in new developments and requiring projects to meet federal, state, regional, and local stormwater requirements, including stormwater infiltration. The General Plan EIR concluded that implementation of the SSF 2040 General Plan would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

PROJECT ANALYSIS

The proposed Project will be designed and operated consistent with the San Francisco Bay Region's basin planning and NPDES framework discussed in the General Plan EIR Conclusions. Post-construction runoff from new/replaced impervious areas will be routed to on-site treatment BMPs (e.g., biofiltration/flow-through planters, pervious paving) before discharge to the municipal storm drain, and standard source-control and pollution-prevention practices will be implemented during operation. During construction, the Project will implement City-required erosion/sediment controls and spill-prevention BMPs that align with the State's Construction General Permit practices. These measures ensure the Project does not obstruct or conflict with applicable water quality control plan objectives.

As discussed in the Project Description, the proposed Project would be serviced by the WWD, which receives 100% of its water from the San Francisco Water Department. The water comes from Hetch Hetchy in Yosemite National Park and local reservoirs. Subsurface exploration for the Project site did not encounter groundwater, and the Project site is not within the limits of an identified groundwater basin. No groundwater extraction, dewatering, or wells are proposed. Accordingly, there is no applicable Groundwater Sustainability Plan governing the Project site, and Project activities would not impede sustainable groundwater management. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project would not pose impacts related to potential obstruction of a water quality control plan or sustainable groundwater management plan (CEQA Checklist Question 5.X.e). This impact would be less than significant, and no mitigation is required.

CEQA Conclusion Pertaining to Hydrology and Water Quality

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts related to hydrology as identified in that Program EIR, nor would it result in new significant impacts related to hydrology that were not previously identified. The General Plan EIR did not identify any mitigation measures related to hydrology that would apply to the proposed Project, and no mitigation, other than existing regulatory requirements, would be needed. Further environmental analysis of the proposed Project pertaining to the topic of hydrology is not required, as the proposed Project would not result in a substantial increase in the severity of hydrology and water quality impacts compared to the impacts identified in the General Plan EIR.

XI. Land Use

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Physically divide an established community?	LTS	■	□	–	LTS
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	LTS	■	□	–	LTS

a) Divide an Established Community

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact LU-1) concluded that implementation of the SSF 2040 General Plan would not divide an established community. The General Plan EIR found that implementation of the SSF 2040 General Plan policies and actions would support community connectivity rather than support development that could divide an established community. New development is anticipated to be primarily infill development and redevelopment of existing developed properties, which would not divide an established community. The General Plan EIR determined that the SSF 2040 General Plan would not physically divide an established community, and impacts would be less than significant.[73]

PROJECT ANALYSIS

The Project site is located in an urbanized area and surrounded by existing residential properties and roadways. The purpose of the proposed Project is to demolish an existing maintenance building and construct a new space to relocate and expand an existing preschool facility to serve the surrounding community. The park and existing preschool facilities are bound by residential neighborhoods to the north and west, Westborough Boulevard to the south, and Galway Drive to the east. The surrounding area contains established single-family homes, a middle school, and community-serving amenities. Because the proposed Project would redevelop an existing community facility within an already urbanized setting, and would not bisect or isolate any residential or commercial areas, it would not physically divide an established community. Instead, the proposed Project would enhance community cohesion by upgrading existing recreational and educational facilities used by residents. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project would not involve any physical changes that would have the potential to divide an established community (CEQA Checklist Question 5.XI.a), and the proposed Project would have no impact under this criterion.

[73] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact LU-1, p. 3.10-15

b) Conflict with Land Use Plan, Policy or Regulation

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact LU-2) concluded that implementation of the SSF 2040 General Plan would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.[74]

- Future development pursuant to the SSF 2040 General Plan would be required to demonstrate consistency with applicable federal, state, and local policies, including those mitigating or avoiding environmental impacts through the mechanisms of project permitting and approvals.
- Plan Bay Area 2050 and the SSF 2040 General Plan use similar growth projections, developed in consideration of each other. The SSF 2040 General Plan would not conflict with Plan Bay Area 2050.
- The SSF 2040 General Plan requires conformance with land use compatibility standards of the SFO ALUCP, ensuring that future development would be consistent with the SFO ALUCP.

PROJECT ANALYSIS

The Project site is designated PR in the General Plan EIR and zoned PR under the SSFMC (Title 20). This zoning district allows for recreational facilities, public amenities, and day care centers or preschools as permitted uses.

The proposed Project has been designed in accordance with the City's design and development standards, including setbacks, height limits, and site access requirements. It would also be subject to review and approval by the City Planning Division and City Building Division to ensure compliance with applicable zoning and building regulations.

No SSF 2040 General Plan amendment, rezoning, or variance is required for the proposed Project. Additionally, the proposed Project would not conflict with any adopted policies or regulations related to the protection of environmental resources, such as the City's Stormwater Management Ordinance or Ordinance for tree protections as tree removal and replacement will occur consistent with City requirements.

The Project site is located within the nine-county San Francisco Bay Area region covered by Plan Bay Area 2050, adopted by the Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG).[75] Because the proposed Project is within an existing urbanized area and involves redevelopment of an existing community facility rather than conversion of undeveloped land, it aligns with the growth and land use pattern assumptions of Plan Bay Area 2050. The proposed Project does not conflict with the plan's strategies for housing or regional job growth, and instead supports local infrastructure improvements that align with regional policy.

Additionally, the Project site falls within the jurisdiction of the SFO ALUCP, which sets policies for land use compatibility in terms of noise, safety, airspace protection, and AIA disclosures. The Project site is not located within one of the five designated safety zones as shown in SFO ALUCP Exhibit IV-8, and is

[74] City of South San Francisco, SSF *2040 General Plan Draft EIR*, 2022, Impact LU-2, p. 3.10-18

[75] Metropolitan Transportation Commission (MTC) and Association of Bay Area Governments (ABAG). 2021. *Plan Bay Area 2050: Regional Plan for the San Francisco Bay Area*. Adopted October 2021. Available at: https://www.planbayarea.org/. Accessed November 2025

therefore outside the most restrictive aircraft safety risk areas. [76] The proposed land uses (preschool, park) are permitted in the underlying zoning and are consistent with SFO ALUCP land-use compatibility criteria for noise and safety. Moreover, building heights and airspace clearance have been reviewed in accordance with FAA notification requirements and the SFO ALUCP's airspace protection policies. For example, SSFMC Section 20.300.003 (Airport Land Use Compatibility Plan Consistency) cites SFO ALUCP Critical Aeronautical Surface limits. [77] **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project has been developed to support regional policy goals (Plan Bay Area 2050) while remaining in compliance with the airport-related land use compatibility criteria (SFO ALUCP). Because the proposed Project does not conflict with either plan's policies and in fact functions within the intent of each, the proposed Project's consistency with these plans supports a finding of no conflict with applicable land uses (CEQA Checklist Question 5.XI.b). Impacts under this criterion would be less than significant, and no mitigation is required.

CEQA Conclusions Pertaining to Land Use

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant land use impacts as identified in that Program EIR, nor would it result in new significant impacts related to land use that were not previously identified. The General Plan EIR did not identify any mitigation measures related to land use that would apply to the proposed Project and none would be required.

[76] City/County Association of Governments of San Mateo County (C/CAG), *Consolidated Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, 2012.

[77] City of South San Francisco. 2025. *South San Francisco Municipal Code: Title 20 Zoning, Section 20.300.003 Airport Land Use Compatibility Plan Consistency.* Available at: https://ecode360.com/43450932. Accessed November 2025.

XII. Minerals

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	LTS	■	□	–	LTS
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	LTS	■	□	–	LTS

a)–b) Loss of Important Mineral Resources

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Section 6.2.2) concluded that there are no mineral resource recovery sites within the city. The Aggregate Resource Sectors Map prepared by the California Geological Survey indicates that no property within the city is owned or controlled by aggregate producers.[78] The Mineral Resource Zones map prepared by the California Geological Survey indicates that the majority of the city is located within Mineral Resource Zone (MRZ)-1, where no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.[79] As such, the General Plan EIR determined that development pursuant to the SSF 2040 General Plan would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, and this impact was determined to be less than significant.[80]

PROJECT ANALYSIS

According to the General Plan EIR, the Project site and surrounding urbanized areas of South San Francisco are not located within or near any area designated by the State Mining and Geology Board as a Mineral Resource Zone (MRZ-2), which identifies lands containing significant mineral deposits. Likewise, the Project area is not identified in any local or regional mineral resource management plan, nor is it located near any active or planned mineral extraction or aggregate production operations. The Project site is developed within Westborough Park and consists of paved recreation facilities, landscaped areas, and community structures, all located within a fully urbanized area of the city. No mineral extraction, aggregate processing, or other surface mining activities occur on the Project site or in its vicinity. Because the Project site contains no known mineral deposits and is not designated for mineral recovery by the City or California Department of Conservation, the proposed Project would not result in the loss of

[78] California Geological Survey (CGS). 2019. *Aggregate Resource Sectors Map of California*. California Department of Conservation. Available at: https://www.conservation.ca.gov/cgs/Pages/Index.aspx. Accessed December 2025.

[79] California Geological Survey (CGS). 2022. *Mineral Resource Zones (MRZ) Map of California*. California Department of Conservation. Available at: https://www.conservation.ca.gov/cgs/minerals. Accessed October 2025.

[80] City of South San Francisco, SSF *2040 General Plan Draft EIR*, 2022, Section 6.2.2, p. 6-2

availability of any mineral resource of value to the region or the state. Similarly, there are no locally important mineral resource recovery sites identified within or adjacent to the Project area, and the proposed Project would not preclude access to, or extraction of, any such resources in the future.

The Project site is not mapped as containing regionally significant or locally important mineral resources, nor is it planned for mineral extraction. Redevelopment of the existing park area with preschool facilities would not interfere with, or restrict access to, any known or potential mineral resource. Impacts related to the loss of availability of mineral resources or the loss of access to locally important mineral resource recovery sites would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would not result in the loss of availability of a known or locally important mineral resource (CEQA Checklist Questions XII.a and XII.b). Therefore, impacts related to mineral resources would be less than significant, and no mitigation is required.

CEQA Conclusions Pertaining to Mineral Resources

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts on mineral resources as identified in that Program EIR, nor would it result in new significant impacts related to mineral resources that were not previously identified. The General Plan EIR did not identify any mitigation measures related to mineral resources that would apply to the proposed Project, and none would be required.

XIII. Noise and Vibration

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Generate a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS	■	□	--	LTS
b) Generate a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS w/MM	■	□	MM NOI-1	LTS w/MM
c) Generate excessive groundborne vibration or groundborne noise levels?	LTS	■	□	–	LTS
d) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	LTS w/MM	■	□	–	No Impact

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts regarding noise and vibration resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts regarding noise and vibration are avoided, minimized, or reduced to a less-than-significant level.

> **Mitigation Measure NOI-1: Operational Noise Reduction Plan**: Prior to issuance of building permits, the project applicant or sponsor shall implement the following measures to limit onsite operational stationary noise source impacts:
>
> - Any proposed development projects that include parking areas, terminals, or loading docks of commercial or industrial land uses within 300-feet of a residential receptor shall demonstrate compliance with Policies NOI-1.1 and NOI-1.2 of the City's Noise Element by submitting a final acoustical report prepared to the satisfaction of the Planning Division that identifies design measures to adequately minimize the potential noise impacts of vehicles on the site to adjacent land uses. The report must be approved by the Planning Division prior to issuance of building permits.
> - For any future development project that would include exterior mechanical systems (such as mechanical ventilation systems) within 50 feet of a residential receptor, the project

applicant or sponsor shall submit a final acoustical report prepared to the satisfaction of the Planning Division that demonstrates compliance of the project with Policies NOI-1.1 and NOI-1.2 of the City's Noise Element. Noise reduction design features may include, but are not limited to, locating stationary noise sources on the site to be shielded by structures (buildings, enclosures, or sound walls) or by using equipment that has a quieter rating. The report must be approved by the Planning Division prior to issuance of building permits.

a) Temporary Construction Noise

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact NOI-1) concluded development and land use activities contemplated by the SSF 2040 General Plan could generate a substantial temporary increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. Construction activity can temporarily increase noise. The City has not adopted numeric thresholds of significance for construction noise, which is typically considered temporary in nature, intermittent, and a normal part of living in a developed, urban area. However, the City has adopted mandatory requirements to ensure that construction noise remains less than significant. Compliance with mandatory requirements of SSFMC and SSF 2040 General Plan policies will ensure that construction noise occurs only at appropriate times of day and is minimized to acceptable levels. Therefore, construction noise impacts were found to be less than significant.[81]

PROJECT ANALYSIS

As previously stated, the City has not adopted numeric thresholds of significance for construction noise. Impacts associated with construction as a result of SSF 2040 General Plan buildout were determined to be less than significant with adherence to the SSF 2040 General Plan and SSFMC. However, SSFMC Section 8.32.050 (Noise Regulations, Special Provisions) prohibits noise levels that cannot meet a performance standard of less than 90 dB at a distance of 25 feet or at the property plane. Additionally, Section 8.32.050 prohibits construction outside of the hours of 8:00 a.m. and 8:00 p.m., on Saturdays between the hours of 9:00 a.m. and 8:00 p.m., and on Sundays and holidays between the hours of 10:00 a.m. and 6:00 p.m., unless otherwise authorized by the City Manager, or the manager's designee.

As documented in Section 3.3.6, *Construction*, of this CEQA Checklist, construction hours would be limited to 8:00 a.m. to 5:00 p.m., Monday through Friday. Activities may occur between 7:00 a.m. and 8:00 a.m. on weekdays and 9:00 a.m. and 4:00 p.m. on Saturdays, but such activities would be limited to quiet activities and would not involve engine-driven machinery. Although the City allows construction from 8:00 a.m. to 6:00 p.m. on Saturdays and 10:00 a.m. to 6:00 p.m. on Sundays, weekend construction is not anticipated and would require permission from the City. The proposed construction dates and hours are within those allowable under Section 8.32.060 (Noise Regulations, Exception Permits). Construction activities would include parking lot reconfiguration and resurfacing, installation of new underground utilities, grading and foundation work, and construction of new pedestrian pathways, play areas, and landscaping. New site lighting, fencing, and signage would be installed to enhance safety and functionality. Construction is anticipated to occur over approximately 12 months.

Per the General Plan EIR, SSFMC Section 8.32.050 is applied to all construction permits, and compliance with the restrictions on construction hours and noise levels are mandatory and enforced through monitoring by City Grading and Building Department personnel. Furthermore, SSF 2040 General Plan

[81] City of South San Francisco, SSF *2040 General Plan Draft EIR*, 2022, Impact NOI-1, p. 3.11-24

Policy NOI 1-2 requires enforcement of the City's noise performance standards, and SSF 2040 General Plan Action NOI 1.2.1 includes the requirement to restrict construction activities to acceptable time periods and to construct temporary sound walls during construction when necessary. If noise levels cannot meet either of the noise level performance standards identified, SSFMC Section 8.32.060 also allows for an exception permit to be granted so long as an investigation of available noise abatement techniques indicates that compliance with the requirements of SSFMC Section 8.32.050 would be impractical or unreasonable, and measures are implemented to minimize the public detriment caused by such exceptions.

With adherence to SSF 2040 General Plan and SSFMC requirements, the Project construction times of day and noise levels would be monitored for compliance with SSFMC requirements, and implementation of all practical, reasonable, and available noise abatement techniques employed as needed to reduce noise levels to meet either of the performance standards identified in Section 8.32.050. Consistent with the conclusions of the General Plan EIR, adherence with the aforementioned requirements of the SSF 2040 General Plan and SSFMC are sufficient to ensure that the proposed Project does not generate a substantial temporary increase in ambient noise levels. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to comply with all standards and regulations pertaining to construction noise. Construction noise would be temporary and cease at the completion of the construction process. As such, the proposed Project would not expose persons to a substantial temporary increase in ambient noise levels in excess of standards established in the SSF 2040 General Plan or SSFMC (CEQA Checklist Question 5.XIII.a). This impact would be less than significant, and no mitigation is required.

b) Permanent Operational Noise

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact NOI-1) concluded that development and land use activities contemplated by the SSF 2040 General Plan could generate a substantial permanent increase in ambient noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.[82]

A characteristic of noise is that audible increases in noise levels generally refer to a change of 3 A-weighted decibels (dBA) or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, a significant impact would occur if the proposed Project would cause the CNEL to increase by any of the following:

- 5 dBA or more even if the CNEL would remain below normally acceptable levels for a receiving land use.
- 3 dBA or more, thereby causing the CNEL in the vicinity of the Project site to exceed normally acceptable levels and result in noise levels that would be considered conditionally acceptable for a receiving land use.
- 1.5 dBA or more where the CNEL currently exceeds conditionally acceptable level.

In industrial areas of the city, a CNEL value of less than 75 dBA is considered "satisfactory."

[82] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact NOI-1, starting at p. 3.11-27

The General Plan EIR used the Federal Highway Administration (FHWA) highway traffic noise prediction model (FHWA-RD-77-108) and traffic data prepared for the General Plan EIR to evaluate existing and future traffic noise conditions along modeled roadway segments. The resultant noise levels were weighted and summed over a 24-hour period to determine the CNEL values. The resulting noise levels were considered "normally acceptable" for all land use types. Therefore, the General Plan EIR determined this impact to be less than significant.[83]

Future development projects would include new stationary noise sources such as parking lot activities and mechanical ventilation system equipment. These potential point sources of noise could affect noise-sensitive receptors in the vicinity if they were to occur in areas adjacent to sensitive receptor land uses. Therefore, the General Plan EIR identified mitigation as required to reduce this potential impact. With implementation of these mitigation measures, impacts generated by future development projects were found to be reduced to less-than-significant levels.

PROJECT ANALYSIS

The proposed Project includes construction of a new preschool facility within Westborough Park featuring five indoor classrooms, one covered outdoor classroom, and administrative office space. Project components also include reconfiguration of the existing parking lot to improve circulation and accessibility, and park improvements such as new landscaping, lighting, pedestrian walkways, and a public restroom building to enhance the overall functionality and safety of the Project site. Under the proposed Project, the use of Westborough Park for educational and recreational purposes would be preserved, and noise levels generated by these uses at nearby sensitive receptors would be approximately the same as they are under existing conditions. Similarly, the proposed cosmetic and ADA-compliant improvements to Westborough Park would not increase use of the park and therefore would not result in a substantial permanent noise increase. While the proposed Project would alter the parking lot (see Section 3.3.2, *Site Access, Circulation, and Parking*, of this CEQA Checklist), the total number of spaces would remain constant and noise levels would be consistent with those under existing conditions. However, the proposed Project would introduce new mechanical equipment in the form of HVAC systems and increase traffic volumes experienced by the Project site and adjacent sensitive noise receptors; these potential impacts on permanent ambient noise levels are discussed below.

Traffic Noise

As shown on Table 3.11-8 in the General Plan EIR, the intersection of Westborough Boulevard and Galway Place where the Project site is located experiences a CNEL of 69.8 dBA, which is conditionally acceptable for residential uses under SSFMC Chapter 20.300. Accordingly, the appropriate threshold of significance for substantial permanent increases in ambient noise levels is 3 dBA. In order for ambient noise levels to rise by 3 dBA or greater as a result of increased traffic volumes, the proposed Project would need to at least double traffic volumes. This is a general rule that holds true due to the logarithmic nature of noise levels, absent any changes to permitted traffic speeds or increases in truck volumes. The proposed Project does not include any changes to speed limits or uses that would increase truck trips.

As documented in Appendix D, the Project operation would increase weekday daily trips (when traffic volumes are at their highest) by 117 daily trips. By way of comparison, there are 31,900 average daily trips (ADT) at the intersection of Westborough Boulevard and Galway Place, far greater than the number of daily trips added by the proposed Project. Accordingly, as the proposed Project would not remotely double traffic volumes at the nearest intersection, and contributions to ADT at other roadways would be

[83] Note that none of the roadway segments analyzed in the General Plan EIR was located in the East of 101 subarea or in the vicinity of the Project site.

even lower due to the dispersion of trip routes, traffic noise would not increase by 3 dBA or more as a result of the proposed Project, and impacts would be less than significant. **(Less than Significant)**

Operational Noise

A significant impact would occur if operational noise levels generated by stationary noise sources at development projects under the General Plan EIR exceed the residential performance standard of 60 dBA maximum noise level (L_{max}) between 7:00 a.m. and 10:00 p.m. and 50 dBA L_{max} between 10:00 p.m. and 7:00 a.m.

Noise levels from commercially available HVAC equipment ranges from 50 dBA to 60 dBA equivalent noise level (L_{eq}) at a distance of 25 feet. Noise levels from HVAC equipment can exceed the City's thresholds if they were to occur in areas adjacent to sensitive receptor land uses. Mechanical equipment operational noise can be mitigated either at the source or at the receiving land use using setbacks, shielding, or acoustic-rated windows, or by locating such equipment on rooftops or sides of buildings opposite sensitive receptors (using buildings as shielding). For example, at a distance of 50 feet, unobstructed mechanical ventilation equipment operational noise levels would attenuate to below 55 dBA L_{max}, while properly sited structural (building or sound wall) shielding can provide an expected 12 dBA to 20 dBA reduction.

The rooftop heat pump condensing units and associated equipment would be located near the center of the buildings and more than 50 feet from the nearest off-site sensitive receptors (the duplex residences across Galway Drive). At this distance, HVAC noise levels would be expected to attenuate such that sound levels at the nearest residences would not be expected to exceed the applicable significance thresholds or exterior noise standards.

In addition, consistent with General Plan EIR MM NOI-1, the proposed Project would be required to ensure that any new stationary mechanical equipment is selected, located, and, if necessary, shielded (e.g., via noise screens, parapets, or acoustical enclosures) so that noise levels at nearby sensitive receptors do not exceed applicable standards. If, during final design, the mechanical equipment were relocated to within 50 feet of nearby residences, MM NOI-1 would apply, and implementation of that mitigation measure would ensure that noise from HVAC equipment would remain less than significant with mitigation.

Noise generated during Project operation would primarily result from preschool activities (children playing in outdoor areas), vehicle traffic associated with student drop-off and pick-up, and periodic landscape maintenance. These uses are typical for educational and park settings and would occur during daytime hours only (approximately 7:00 a.m.–6:00 p.m.), consistent with the SSFMC Section 8.32 (Noise Regulations). The proposed Project would not include amplified outdoor sound systems or nighttime events.

The General Plan EIR identifies a normally acceptable noise level for schools of up to 70 dBA CNEL and existing ambient noise levels in the Project vicinity. Dominated by traffic along Westborough Boulevard to the south, ambient noise levels already range from approximately 60 to 65 dBA CNEL. Noise generated by outdoor play activities typically ranges from 55 to 65 dBA L_{eq} at 50 feet, decreasing rapidly with distance and landscaping. These intermittent daytime noises would be comparable to existing conditions associated with the current preschool/community facilities and park use and would not substantially elevate community noise levels.

Given the similarity in use intensity to existing conditions, the limited hours of operation, and compliance with applicable City noise regulations and SSF 2040 General Plan standards, the proposed Project would

not result in a substantial permanent increase in ambient noise levels. **(Less than Significant with Mitigation)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to comply with all standards and regulations pertaining to operational noise. The proposed Project would not expose persons to a substantial permanent increase in ambient noise levels in excess of standards established in the SSF 2040 General Plan or SSFMC (CEQA Checklist Question 5.XIII.b). This impact would be less than significant, and no mitigation is required.

c) Groundborne Vibration

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact NOI-2) determined that implementation of the SSF 2040 General Plan could result in generation of excessive groundborne vibration or groundborne noise levels. Construction activities and the operation of heavy trucks, buses, and trains can produce vibration that may be felt by adjacent uses. [84]

Of the variety of equipment used during construction, impact pile drivers produce the greatest groundborne vibration levels. Construction vibration levels from future development projects could exceed the Federal Transit Administration (FTA) damage threshold criteria of 0.12 inches per second peak particle velocity (PPV). The General Plan EIR found that construction vibration sources can be mitigated to acceptable levels either at the source, or on the adjacent property using alternate equipment, adequate setbacks, or by digging temporary trenches between the source and the receptor. SSF 2040 General Plan policies require a vibration impact analysis for any construction activities located within 100 feet of residential or sensitive receptors that require the use of pile-driving or other construction methods that have the potential to produce high groundborne vibration levels. These required site-specific analyses would identify measures such as setback requirements, use of alternate construction methods, or preemptive trenching to interrupt groundborne vibration transmission. These policies are applied to all construction permits and compliance is mandatory, ensuring that construction groundborne vibration impacts will not occur to a level that exceeds the SSF 2040 General Plan policy thresholds. With compliance with mandatory requirements of the SSF 2040 General Plan, construction groundborne vibration impacts were found to be reduced to acceptable (less-than-significant) levels.

PROJECT ANALYSIS

Construction

Project construction would involve demolition of an existing maintenance building, grading, foundation work, and new building construction, all of which can generate short-term groundborne vibration from heavy equipment such as loaders, compactors, and haul trucks. The General Plan EIR identifies construction vibration as a temporary condition that typically does not exceed thresholds for damage or annoyance when standard construction practices are followed.

The nearest vibration-sensitive receptors include single-family residences approximately 75 to 100 feet north and east of the Project site and the adjacent Westborough Middle School to the west. While Project construction would involve heavy machinery, the proposed Project does not include pile driving, blasting,

[84] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact NOI-2, p. 3.11-32

or other high-vibration construction methods. Construction activities would comply with SSFMC Section 8.32 (Noise Regulations), which limits construction work to daytime hours (7:00 a.m.–8:00 p.m., Monday–Friday, and 9:00 a.m.–8:00 p.m. on weekends and holidays) and requires implementation of BMPs to minimize noise and vibration impacts.

Given the temporary nature of construction, the absence of high-vibration activities such as pile driving, and the Project's compliance with SSFMC requirements and standard construction BMPs, vibration levels would not exceed applicable thresholds or result in damage or perceptible disturbance to nearby structures or occupants. These requirements are consistent with the measures and assumptions used in the General Plan EIR, which concluded that compliance with applicable regulations would limit construction vibration impacts to less-than-significant levels.

Operational

During operation, the Project would consist of preschool activities, vehicle circulation within the reconfigured parking lot, and routine landscape maintenance. These types of uses are not significant sources of groundborne vibration. The proposed Project does not include any stationary mechanical equipment or operational processes (e.g., large chillers, industrial machinery, rail transit) that would generate significant vibration.

The General Plan EIR concluded that typical institutional and recreational land uses do not produce vibration levels exceeding City or Caltrans thresholds and therefore do not pose a risk of long-term structural damage or human annoyance. The proposed Project would operate within these guidelines, operating within the same developed site footprint and land use context analyzed in the General Plan EIR.

Because operational activities would be limited to low-vibration sources such as passenger vehicles and small mechanical systems (i.e., HVAC), and because the proposed Project would comply with applicable City noise control standards and CBC vibration design requirements, operational groundborne vibration impacts would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the General Plan EIR, construction vibrations attributed to the proposed Project would not generate excessive groundborne vibration or groundborne noise levels that exceed applicable thresholds (CEQA Checklist Question 5.XIII.c). This impact would be less than significant, and no mitigation is required**.**

d) Excessive Noise Levels from Airport Activity

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact NOI-3) concluded that future development pursuant to the SSF 2040 General Plan could expose people residing or working in the area to excessive noise levels for projects located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport. South San Francisco experiences air traffic noise impacts due to its proximity to SFO. Future development could introduce noise-sensitive land uses to excessive aircraft noise levels if they occur within the 65 dBA CNEL contours of the airport. Any local plans, policy actions, or development activities that affect areas within the 65 dBA CNEL contour established in the SFO ALUCP must receive C/CAG ALUC approval or have a finding of overriding consideration prior to local permit issuance. The General Plan EIR recommended mitigation measures that would require using acoustic-rated wall and window assemblies at the receiving land use.

The General Plan EIR concluded that implementation of mitigation measures would reduce the potential effect of airport activity noise to less than significant.

PROJECT ANALYSIS

The SFO ALUCP establishes boundaries within which noise compatibility policies apply. These boundaries depict "noise impact areas" or noise compatibility zones, defined by noise contours at the 65 dB, 70 dB, and 75 dB CNEL contours. The Project site is not located within any of the SFO ALUCP-identified noise impact areas, and there are no other airports within 2 miles of the Project site. Thus, the SFO ALUCP land use noise exposure criteria do not apply to the proposed Project. **(No Impact)**

CONCLUSION

The proposed Project would not expose people working in the area to excessive noise levels from a private airstrip, a public airport or public use airport (CEQA Checklist Question 5.XIII.d), and no mitigation is required.

CEQA Conclusions Pertaining to Noise and Vibration

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant noise impacts as identified in that Program EIR, nor would it result in new significant noise impacts that were not previously identified. The General Plan EIR did not identify any mitigation measures related to noise that would apply to the proposed Project and none would be required. The proposed Project would comply with applicable City noise control standards and building code vibration design requirements, operational groundborne vibration impacts would be less than significant.

XIV. Population and Housing

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	LTS	■	□	–	LTS
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	LTS	■	□	–	No Impact

a) Population Growth

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact POP-1) concluded that future development pursuant to the SSF 2040 General Plan would not induce substantial unplanned population growth. The SSF 2040 General Plan anticipates approximately 14,312 net new housing units, for a projected 38,959 total housing units by 2040. The SSF 2040 General Plan also anticipates approximately 42,297 net new employment opportunities, with a projected 137,557 total employment opportunities by 2040. This new growth would increase the City's population by approximately 40,068 people. The SSF 2040 General Plan also found that under current and projected future conditions, the City provides more jobs than it has employable residents. These results indicate that the City is likely to experience intensified pressure for additional residential development to house the labor force of the City.

By virtue of the fact that the SSF 2040 General Plan is the long-range blueprint for growth and development in the city, the additional population growth (housing and employment) would be considered planned growth. The City has supported urban growth and development that is served by infrastructure for more than 100 years, and accordingly, implementation of the SSF 2040 General Plan would not result in indirect growth. The General Plan EIR found impacts related to unplanned population and employment growth to be less than significant.[85] **(Less than Significant)**

PROJECT ANALYSIS

As indicated in Section 3.3.1, *Preschool Expansion*, of this CEQA Checklist, the proposed Project's expanded preschool facilities would be constructed in an area that is already developed and intended to provide access within the surrounding residential community, providing improved access to preschool facilities for families who already live and work in the area. The proposed improvements would not include the development of housing or employment-generating commercial uses, nor would they extend urban infrastructure into undeveloped areas.

[85] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact POP-1, p. 3.12-19

The proposed Project would not induce population growth directly, as it would not create new housing, nor indirectly, since it would not result in new roadways, utility extensions, or other growth-inducing infrastructure. It involves replacement and modest expansion of an existing public service use, consistent with the SSF 2040 General Plan and the Project site's PR zoning designation. The General Plan EIR found that projects of this type do not contribute to unplanned population growth, as they provide service for existing community needs. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, The proposed Project would enhance local childcare access without generating new population or extending urban infrastructure. Therefore, the Project would not induce substantial unplanned population growth, either directly or indirectly (CEQA Checklist Question 5.XIV.a). This impact would be less than significant, and no mitigation is required.

b) Housing Displacement

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact POP-2) concluded that buildout of the SSF 2040 General Plan would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The SSF 2040 General Plan includes policies and actions to ensure that existing housing is appropriately protected, and additional housing is added to support future growth within the city. When the City receives development applications for subsequent development, those applications will be reviewed for compliance with the SSF 2040 General Plan and the SSFMC to ensure the displacement of housing or significant need for new housing does not occur. As such, the General Plan EIR concluded that development pursuant to the SSF 2040 General Plan would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and impacts were found to be less than significant.[86]

PROJECT ANALYSIS

The Project site is located within Westborough Park in South San Francisco and currently developed with recreational facilities, including an existing preschool and maintenance building. The Project site does not contain any housing units or residential encampments, and no residences are proposed for demolition or alteration.

The proposed Project would include the demolition of an existing maintenance building but would not displace any residents or require relocation of people or housing. Therefore, the proposed Project would not displace any existing people or housing, and no impact would occur. **(No Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the Project would not displace substantial numbers of existing people or housing, (CEQA Checklist Question 5.XIV.b). No impact would occur, and no mitigation is required.

[86] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact POP-2, p. 3.12-21

CEQA Conclusions Pertaining to Population and Housing

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the Project would not substantially increase the severity of any significant impacts related to population or housing as identified in that Program EIR, nor would it result in new significant impacts related to population or housing that were not previously identified. The prior Program EIR did not identify any mitigation measures related to population or housing that would apply to the Project and none would be required.

XV. Public Services and Recreation Facilities

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?	LTS	■	□	SSFMC 15.24	LTS
b) Result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?	LTS	■	□	–	No Impact
c) Result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools?	LTS	■	□	–	LTS
d) Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library facilities?	LTS	■	□	–	LTS

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
e) Result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, need for new or physically altered other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for other public facilities?	LTS	■	□	–	LTS
f) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	LTS	■	□	–	LTS
g) Include parks or recreational facilities or require the construction or expansion of parks or recreational facilities, which may have an adverse physical effect on the environment?	LTS	■	□	–	LTS

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to public services and recreation facilities resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to public services and recreation facilities are avoided, minimized, or reduced to a less-than-significant level.

SSFMC Chapter 15.24: California Fire Code and SSFMC Amendments. Pursuant to SSFMC Chapter 15.24 (California Fire Code), the proposed Project shall comply with all provisions of the California Fire Code 2019 Edition as published by the California Building Standards Commission, and as modified by the amendments, additions and deletions set forth in Section 15.24.020 Amendments. The SSFFD Fire Chief shall examine all building permit applications for the proposed Project and indicate approval or disapproval thereof, based on applicable sections of the California Fire Code and other related statutes and ordinances. No certificate of occupancy shall be issued for the proposed Project without the approval of the SSFFD Fire Chief or the Fire Chief's designated representative.

a) Fire Protection

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact PUB-1) found that implementation of the SSF 2040 General Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities or the need for new or physically altered fire protection facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection.[87]

The General Plan EIR found that development and growth in the city would increase demand for fire protection services, and as the demand for fire protection services increases there may be a need to increase staffing and equipment to maintain acceptable service ratios, response times, and other performance standards. This would require existing fire stations to be able to accommodate the additional staff and/or equipment. If an existing fire station is at capacity for staffing, this could require an expansion of an existing fire station or construction of a new fire station, the construction of which could cause environmental impacts. The Project-specific environmental impacts of constructing new or expanded fire protection facilities to support the growth anticipated under the SSF 2040 General Plan could not be determined because the Project site-specific locations and designs of future new or expanded facilities were not known. However, fire protection facilities are allowed within the "Public" land use designation and are contemplated as part of the SSF 2040 General Plan, which could include fire protection facilities. It can be expected that construction and operation of future new or expanded fire protection facilities would have similar impacts as would construction and operation of other types of new development. As the City proceeds with the construction of new or expanded fire protection facilities, those projects will be reviewed by the City for compliance with the policies and actions of the SSF 2040 General Plan, SSFMC, and mitigation measures referenced in other sections of General Plan EIR. Therefore, the physical effects on the environment from the construction of new or expanded fire protection facilities would be less than significant.

Furthermore, as the City receives development applications for subsequent development pursuant to the SSF 2040 General Plan, those applications will be reviewed by the City for compliance with policies and actions of the SSF 2040 General Plan to ensure that fire protection services keep pace with new development. In addition, SSFMC would be consulted when development applications are received, including Chapter 8.75 (Public Safety Impact Fee) and Chapter 15.24 (California Fire Code). Therefore, future development under the proposed Project would not result in significant adverse effects related to fire protection services, and impacts would be less than significant.

PROJECT ANALYSIS

The SSFFD's service area and response capacity were evaluated in the General Plan EIR, which concluded that urban infill and redevelopment consistent with the SSF 2040 General Plan would not require new or expanded fire facilities beyond those already planned. The proposed Project is a small-scale intensification of an existing, community-serving use and would not introduce new residential units, new development areas, or a substantial increase in service population.

Importantly, Fire Station No. 64 is located immediately north of the Project site, directly adjacent to Westborough Park, and already provides primary fire and emergency medical services to the area. Because of this proximity, response times to the Project site are already optimized and would not be adversely affected by the proposed Project.

The proposed Project's modest increase in preschool enrollment (from 59 to 100 children) represents a minor operational intensification fully contemplated in the SSF 2040 General Plan buildout scenario. The new preschool building would be constructed in compliance with the California Fire Code, CBC, SSFFD development standards, and all required access and fire flow requirements, ensuring that the proposed Project does not create new service deficiencies or require additional fire facilities.

[87] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact PUB-1, p. 3.13-22

Therefore, the proposed Project would not result in the need for new or physically altered fire protection facilities, and impacts would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with all regulatory standards of SSFMC, including those standards identified in the California Fire Code. Implementation of these regulatory standards and the proposed Project would not pose impacts on the provision of effective fire protection services (CEQA Checklist Question 5.XV.a). This impact would be less than significant, and no mitigation is required.

b) Police Service

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact PSU-2) found that implementation of the SSF 2040 General Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities or the need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times or other performance objectives for police protection. The SSF 2040 General Plan includes policies and actions to ensure that police protection services keep pace with new development, and SSF 2040 General Plan Policy SA-16.4 requires the City to coordinate with the SSFPD to ensure public services can accommodate growth impacts of new development in the East of 101 subarea. The General Plan EIR found that future development pursuant to the SSF 2040 General Plan would not result in significant adverse effects related to police protection services and impacts would be less than significant.[88]

PROJECT ANALYSIS

A significant impact may occur if the SSFPD could not adequately serve a project, and a new or physically altered police station would be necessary. The Project area receives law enforcement services from the SSFPD Patrol Division, which consists of 40 officers and four patrol beats covering 11 square miles of the city. The closest police station is located approximately 1.35 miles to the northeast at 33 Arroyo Drive.

The proposed Project would demolish an existing maintenance building and replace it with a preschool facility without increasing the City's residential population or overall service demand. Once operational, the proposed preschool would serve up to 100 students and employ approximately 15 staff members. The proposed Project also includes various improvements to Westborough Park. The new preschool facility would serve the existing community and would not introduce new residents or employment centers requiring expanded police coverage. As discussed in the General Plan EIR, buildout of community-serving infill projects consistent with the SSF 2040 General Plan is not expected to necessitate new or expanded police facilities beyond those already planned. The proposed Project would not have significant impact on police protection services, and no mitigation is required. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the Project would be required to fully comply with all regulatory standards of the SSFMC, including public safety fees. The proposed Project would pose no

[88] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact PUB-2, p. 3.13-24

impact on the provision of effective police services (CEQA Checklist Question 5.XV.b), and no mitigation is required.

c) Schools

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact PUB-3) found that implementation of the SSF 2040 General Plan would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. Development and growth in the city would increase demand for school facilities. However, schools within the South San Francisco Unified School District (SSFUSD) are operating at approximately 65.7% of capacity. Therefore, as the demand for school services increases from the buildout of the SSF 2040 General Plan, existing school facilities would be able to accommodate the additional students in existing facilities. As student enrollment increases, there will be an incremental increase in staffing and equipment needed to maintain acceptable service ratios and other performance objectives for schools. However, the incremental increase in staffing and equipment would not result in significant environmental impacts. Furthermore, as the City receives development applications for subsequent development, those applications will be reviewed to ensure that school facilities keep pace with new development, including payment of school impact fees per SB 50. The General Plan EIR concluded that future development would not result in significant adverse effects related to school facilities and impacts would be less than significant.[89]

PROJECT ANALYSIS

The proposed Project would include the expansion of an existing preschool facility within Westborough Park in South San Francisco. The Project site is located within the SSFUSD service area, which operates nearby Westborough Middle School immediately west of the Project site, along with other elementary and secondary campuses serving the surrounding neighborhoods.

Because the proposed Project would provide early childhood education facilities rather than new housing or employment centers, it would not generate new student enrollment in public schools. Instead, the proposed Project is intended to serve existing families in the community by improving and expanding the preschool capacity to meet existing childcare demand. As such, the proposed Project would reduce pressure on existing educational facilities by providing additional licensed preschool space, consistent with the City's and SSFUSD's goals to expand early education access within developed areas. Additionally, the proposed Project is consistent with the SSF 2040 General Plan PR land use designation. **(No Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with all regulatory requirements of the SSFMC. As such, the proposed Project would not cumulatively increase demands on schools, libraries and childcare services (CEQA Checklist Question 5.XV.c) to a level of less than significant, and no mitigation is required.

[89] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact PUB-3, p. 3.13-26

d) Library Facilities

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR concluded that while additional demand could require more staffing and equipment at existing libraries, the new Community Civic Campus library would accommodate a portion of the increased need, and existing facilities could be expanded or reconfigured if necessary. Relevant SSF 2040 General Plan policies (LU-1.4, ECS-7.1, ECS-7.7) commit the City to maintaining adequate library and community services and monitoring performance through surveys and ongoing evaluation.

To ensure facilities keep pace with development, SSFMC Chapter 8.74 (Library Impact Fee) establishes library impact fees to fund improvements such as expanding or remodeling branches, acquiring or repurposing space, upgrading technology, and maintaining service standards. Any future new or expanded library or public facility would be reviewed for consistency with SSF 2040 General Plan policies, the SSFMC, and applicable mitigation measures. Because potential facilities are already contemplated in the "Public" land use designation and would undergo environmental review as individual projects, the General Plan EIR determined that physical impacts from future library or other public facility construction would be less than significant.[90]

PROJECT ANALYSIS

The General Plan EIR concluded that future development consistent with the SSF 2040 General Plan would not require expansion of library facilities beyond those already planned, particularly following completion of the new main library at the Community Civic Campus, which provides capacity for additional staffing, programming, and technology to meet expected citywide growth through 2040.

The proposed Project would not generate new population, new housing, or new residents who might increase library usage. It is a redevelopment and modest operational improvement to an existing community-serving preschool located within an already developed park. Because the preschool population already exists and would simply be relocated and modestly expanded within the same service area, the proposed Project would not increase demand for library services.

Additionally, the proposed Project includes park and circulation improvements that enhance public recreational amenities, representing a beneficial effect, not a strain on public facilities. Therefore, the proposed Project would not require the construction or expansion of library facilities and impacts would be less than significant. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with all regulatory requirements of the SSFMC. As such, the proposed Project's contribution to cumulatively increased demands on library facilities (CEQA Checklist Question 5.XV.d) to a level of less than significant, and no mitigation is required**.**

[90] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact PUB-4, p. 3.13-27

e) Other Public Facilities

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that full buildout of the SSF 2040 General Plan, adding approximately 14,300 new housing units, 42,000 jobs, and a population increase of about 40,000 residents, would increase demand for other public facilities such as community centers, civic buildings, and public service facilities. This growth could necessitate additional staffing and equipment to maintain acceptable service levels, and if existing facilities cannot accommodate such increases, expansion or new construction may be required.

However, the General Plan EIR found that any new or expanded public facilities would occur within areas designated "Public" in the SSF 2040 General Plan Land Use Map, where such uses are contemplated and evaluated under the Program EIR. Approximately 68,000 square feet of new nonresidential public facility space was projected citywide to support future needs. The General Plan EIR concluded that the construction and operation of new or expanded public facilities would have environmental effects comparable to other urban infill development analyzed under the SSF 2040 General Plan, and such projects would undergo individual review to ensure compliance with City policies, the SSFMC, and applicable mitigation measures.

The physical effects associated with new or expanded public facilities were determined to be less than significant, and future development consistent with the SSF 2040 General Plan would not result in significant adverse effects related to other public facilities.

PROJECT ANALYSIS

The proposed Project would redevelop an existing portion of Westborough Park with a new preschool facility, public restroom, with site and parking improvements. The proposed Project would not involve construction of housing or commercial uses that would increase population or intensify citywide service demands. Therefore, it would not generate new demand for community centers, civic buildings, or other public facilities beyond what currently exists.

The General Plan EIR found that buildout of the SSF 2040 General Plan would increase demand for public facilities as population and employment grow, but concluded that existing and planned facilities such as those within the Public land use designation are adequate to support expected growth. The General Plan EIR determined that the construction or expansion of these facilities would be subject to site-specific review and compliance with SSF 2040 General Plan policies and the SSFMC, and that environmental impacts would be less than significant.

The proposed Project is consistent with the SSF 2040 General Plan PR zoning and land use designation and would not create new or accelerated demand for public facilities such as libraries, community centers, or civic offices**. (Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with all regulatory requirements of the SSFMC. The proposed Project would serve existing residents, would not generate population or significant employment growth, and is consistent with the SSF 2040 General Plan assumptions for public service capacity, and it would not require expansion of other public facilities (CEQA Checklist Question 5.XV.e). This impact would be less than significant, and no mitigation is required.

f) Parks

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact REC-1) found that implementation of the SSF 2040 General Plan would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. Development would increase demand for parks and recreational facilities, and as the demand for parks and recreational facilities increases, there may be a need to increase staffing and other resources to maintain existing parks and recreational facilities from their increased use. Additionally, as the demand for parks and recreational facilities increases, there may be a need to expand existing parks and recreational facilities or construct new parks and recreational facilities to maintain acceptable service ratios. Future development applications will be reviewed for compliance with the policies and actions of the SSF 2040 General Plan to ensure that parks and recreational facilities keep pace with new development. The General Plan EIR concluded that future development pursuant to the SSF 2040 General Plan would not result in significant adverse effects related to parks and recreational facilities, and impacts would be less than significant.[91]

PROJECT ANALYSIS

The Project site is located within Westborough Park, a developed public recreation area that already accommodates park visitors, community activities, and the existing preschool use through the community center. The proposed Project includes the modest expansion of the existing preschool operation and upgrades to related park amenities, including landscaping, pedestrian walkways, lighting, and a new public restroom. These improvements would enhance accessibility and functionality for existing park users rather than generate additional demand for neighborhood or regional recreational facilities.

The proposed Project would not result in new housing or population growth that could increase the citywide use of park or recreation facilities. Instead, the upgraded preschool facilities would continue to serve existing families in the surrounding neighborhoods. Because the proposed Project does not add new residential units, it would not contribute to the demand that typically drives the need for expanded park acreage or new recreational facilities.

In addition, the General Plan EIR determined that implementation of the SSF 2040 General Plan would not result in significant physical impacts related to parks and recreational facilities, as future development would be offset by ongoing facility improvements and funding mechanisms such as park impact fees and parks maintenance programs administered by the City Parks and Recreation Department**. (Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with all regulatory requirements of the SSFMC. As such, the proposed Project's contribution to cumulatively increased demands on parks and recreation services (CEQA Checklist Question 5.XV.f) would be less than significant, and no mitigation is required.

[91] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact REC-1, p. 3.13-30

g) Adverse Effects from Construction or Expansion of Parks or Recreational Facilities

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR evaluated how implementation of the SSF 2040 General Plan would affect parks, open spaces, and recreational facilities citywide. The plan envisions new parks, enhanced open spaces adjacent to SR-35, and expanded pedestrian and bicycle connections, primarily in the East of 101, Lindenville, Downtown, Orange Park, and Westborough subareas. These improvements are intended to increase recreational access and connectivity throughout the City.

While the construction of new or expanded parks and recreational facilities could result in environmental effects such as temporary noise, dust, or minor grading impacts, the General Plan EIR determined that these impacts would be comparable to those of other urban infill development analyzed under the SSF 2040 General Plan. The specific environmental effects of future facilities could not be precisely determined because their locations and designs are not yet finalized; however, each project will undergo review to ensure consistency with SSF 2040 General Plan policies, the SSFMC, and applicable mitigation measures.

As such, the General Plan EIR concluded that the physical effects on the environment from new or expanded parks and recreational facilities would be less than significant, and that future park development consistent with the SSF 2040 General Plan would not result in significant adverse environmental impacts.

PROJECT ANALYSIS

The Project site is within the boundaries of Westborough Park, an existing neighborhood park in South San Francisco. Proposed improvements include replacement of the existing preschool building, construction of a new public restroom, installation of upgraded pedestrian pathways and lighting, and landscape enhancements. These improvements would occur entirely within the existing developed park footprint and would not extend into undeveloped land or require expansion of recreational facilities beyond the park's existing boundaries.

The proposed Project does not include new recreational amenities that would substantially increase park capacity or alter park use patterns, such as new athletic fields, courts, or public event spaces. Instead, the proposed Project would improve existing facilities to better serve current users. The temporary effects that accompany construction activities would be short-term, limited to the construction period, and mitigated through standard construction BMPs and compliance with applicable City noise, air quality, and stormwater regulations.

The General Plan EIR found that redevelopment and improvement of existing public facilities, including neighborhood parks, would not result in significant environmental impacts when consistent with SSF 2040 General Plan policies and City regulations. The proposed Project is fully consistent with these planning conditions, as it would modernize an existing park facility without expanding its footprint or creating new recreational demand. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with all regulatory requirements of the SSFMC, would improve existing recreational facilities within an already developed park and would not require or trigger the construction of new recreation facilities, and would not have an adverse physical effect on the environment (CEQA Checklist Question 5.XV.g). This impact would be less than significant, and no mitigation is required.

CEQA Conclusions Pertaining to Public Services and Recreational Facilities

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts related to public services as identified in that Program EIR, nor would it result in new significant impacts related to public services that were not previously identified. The General Plan EIR did not identify any mitigation measures related to public services that would apply to the proposed Project and none would be required.

XVI. Transportation

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subsection(b)?	SU	■	□	–	LTS
b) Conflict with a program, plan, ordinance or policy assessing the circulation system, including bicycle, pedestrian facilities, circulation system including transit?	LTS	■	□	–	LTS
c) Substantially increase hazards due to a geometric design feature?	SU	■	□	SSFMC 20.300.016.B	LTS
d) Result in inadequate emergency access?	LTS	■	□	–	LTS

Information related to the Project and the Project site in the Transportation section of this CEQA Checklist has been derived in part from the *SSF Westborough Preschool Expansion Project VMT/CEQA Initial Study Assessment Technical Memorandum* (Transportation Assessment) (attached as checklist Appendix D).[92]

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to transportation resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to transportation are avoided, minimized, or reduced to a less-than-significant level.

SSFMC Section 20.300.016.B: Visibility at Intersections and Driveways – Driveways. Visibility of a driveway approach to a public street shall not be blocked above a height of three feet by vegetation or structures for a depth of 12 feet as viewed from the edge of the right-of-way on either side of the driveway at a distance of 12 feet.

a) Consistency with State CEQA Guidelines Section 15064.3(b) – Vehicle Miles Traveled

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact TRANS-1) determined that future development and land use activities that occur within South San Francisco in a manner consistent with the SSF 2040 General Plan would conflict or be inconsistent with State CEQA Guidelines Section 15064.3(b). Development under the SSF 2040 General Plan would result in new nonresidential development throughout South San Francisco. Because the city is fully built out, any new development will consist of the redevelopment of parcels that contain

[92] Kittelson & Associates, Inc. 2025. *SSF Westborough Preschool Expansion Project VMT/CEQA Initial Study Assessment Technical Memorandum*. Prepared for SWCA Environmental Consultants.

existing businesses. The General Plan EIR explains that the City's primary approach to accommodating growth is to locate new development in four planning subareas. Each of these subareas are well served by transit service and have good access to jobs, neighborhood amenities and health care facilities. However, the General Plan EIR concluded that the implementation of the SSF 2040 General Plan would result in VMT in excess of the City's VMT threshold of 15% below the current regional average. [93]

The SSF 2040 General Plan and SSFMC policies ordinances address VMT reduction by managing vehicle trips and incentivizing transit use and active transportation. This includes SSF 2040 General Plan Policy MOB-2-1, which calls for incorporating complete street improvements into all roadway and development projects; Policy MOB 3-1, which calls for promoting mode shift among employers; and Policy MOB 4-1, which calls for increasing substantially the proportion of travel using modes other than driving alone.

These policies primarily apply to new development, and existing land uses and land uses that have already been approved and are under construction are generally not affected. Because of the programmatic nature of the SSF 2040 General Plan, the General Plan EIR concluded that no mitigation measures are available, and this impact was found to be significant and unavoidable.

PROJECT ANALYSIS

As of July 1, 2020, SB 743 replaced level of service (LOS) with the VMT metric for use in transportation analyses pursuant to the CEQA.[94] This change was codified in State CEQA Guidelines Section 15064.3. Guidelines for the analysis of VMT impacts are provided in the California Governor's Office of Land Use and Climate Innovation (LCI; formerly the Office of Planning and Research) *Technical Advisory on Evaluating Transportation Impacts in CEQA*[95] and the *South San Francisco General Plan Update: Transportation Analysis Guidelines* (SSF TA Guidelines).

Per the SSF TA Guidelines, certain projects are assumed to have a less-than-significant impact on VMT if they fall within one of the following categories:

1. Projects located within 0.5-mile walkshed around major transit stops.
2. 50% affordable housing projects.
3. Small projects that generate less than 100 new trips per day.
4. Locally serving public facilities that encompass government, civic, cultural, health, and infrastructure uses and activity which contribute to and support community needs.
5. Neighborhood-serving retail projects that are less than 50,000 square feet.
6. Hotels designed to serve business travelers or individuals flying in or out of SFO.
7. Residential and office projects in low VMT areas.[96]

Under Category 4, locally serving public facilities can include police stations, fire stations, passive parks (parks designed for use in an informal way and typically less developed), branch libraries, community

[93] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact TRANS-1, p. 3.14-35

[94] City of South San Francisco. 2022b. *South San Francisco General Plan Update: Transportation Analysis Guidelines.* Available at: https://www.ssf.net/files/assets/public/v/1/economic-amp-community-development/documents/transportation-analysis-gu.pdf. Accessed July 21, 2025.

[95] California Governor's Office of Land Use and Climate Innovation (LCI. 2018. *Technical Advisory on Evaluating Transportation Impacts in CEQA.* April. Available at: https://lci.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf. Accessed November 2025.

[96] City of South San Francisco, *South San Francisco General Plan Update: Transportation Analysis Guidelines*, 2022b.

centers, public utilities, and neighborhood public schools. The Transportation Assessment prepared for the proposed Project found that the average trip length to the school is 1.8 miles per student, with 43 out of 55 students living within 2 miles of the school. Accordingly, the proposed preschool meets the definition of a locally serving public facility, which under the SSF TA Guidelines are presumed to have a less-than-significant VMT impact. Additionally, the C/CAG VMT Estimation Tool, which uses the County's travel demand model to estimate project VMT, also indicates that the proposed Project would have a less-than-significant VMT impact.

Further, the new preschool would meet an existing demand for early childhood education within the community. By increasing preschool capacity at a dedicated, accessible neighborhood facility, average trip lengths are actually expected to decrease as families previously traveling further within the city or outside the city no longer need to travel as far for childcare. None of the other proposed Project improvements are anticipated to result in measurable increases in VMT as they would improve existing facilities and are inherently local serving. For these reasons, the proposed Project would have a less-than-significant, and potentially beneficial, impact on VMT. **(Less than Significant)**

CONCLUSION

Although the General Plan EIR determined that VMT impacts would remain Significant and Unavoidable at full plan buildout, the proposed Project represents a lesser impact relative to that analysis because it would not contribute to regional population or employment growth. Therefore, the proposed Project would not conflict with or be inconsistent with State CEQA Guidelines Section 15064.3(b) regarding VMT (CEQA Checklist Question 5.XVI.a). This impact would be less than significant, and no mitigation is required.

b) Consistency with Circulation Programs, Plans, Ordinances, and Policies

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact TRANS-2) concluded that future development would contribute to and increase the use of bicycle and pedestrian facilities in South San Francisco, which may have a significant impact on the environment. Implementation of the SSF 2040 General Plan may additionally result in other private and public improvements throughout the City that have the potential for environmental effects related to bicycle and pedestrian facilities. Nevertheless, the General Plan EIR noted that the SSF 2040 General Plan aligns with the existing *Active South City Plan: South San Francisco's Bicycle and Pedestrian Master Plan* (Active South City Plan),[97] which enhances bicycle and pedestrian facilities citywide, improves connectivity, and shortens walking and biking distances.[98]

Future development pursuant to the SSF 2040 General Plan would increase use of transit service and transit facilities in South San Francisco. Adding new residents and jobs near transit will increase the number of destinations that can be easily served via transit. Pairing transit-oriented development with improvements to transit access and street designs supports ridership growth for rail, bus, shuttle, and ferry services.

[97] City of South San Francisco. 2022. *Active South City Plan: South San Francisco's Bicycle and Pedestrian Master Plan.* Prepared by Alta Planning + Design. June. Available at: https://www.ssfca.gov/files/assets/public/v/1/city-manager/documents/active-south-city-ssf-bic.pdf. Accessed November 2025.

[98] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact TRANS-2, p. 3.14-41

The SSF 2040 General Plan adopts several policies that result in improving the bicycle and pedestrian network and supporting programs to increase bicycle and pedestrian travel. This includes SSF 2040 General Plan Policies MOB-2-1, MOB-3-1, and MOB-5-2, along with the City's TDM Ordinance, which were found to improve the bicycle and pedestrian network and support programs to increase transit, bicycle, and pedestrian travel and ensure that the proposed Project would not conflict with a program, plan, ordinance, or policy of the circulation system regarding bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Accordingly, the General Plan EIR concludes that, following implementation of these policies, impacts regarding circulation programs, plans, ordinances, and policies will be less than significant.

The General Plan EIR (Impact TRANS-3) concluded that future development pursuant to the SSF 2040 General Plan would not conflict with a program, plan, ordinance or policy regarding transit facilities, and would not decrease the performance or safety of such facilities in a manner that may have a significant impact on the environment.[99]

PROJECT ANALYSIS

The proposed Project is consistent with the SSF 2040 General Plan Mobility Element, which emphasizes creating a safe, connected, and multimodal transportation system with a focus on Safe Routes to School and neighborhood-serving facilities. The proposed Project provides six dedicated pick-up/drop-off stalls, 15 staff stalls, and three ADA stalls within the existing 59-space parking lot. A new internal sidewalk directly connects the drop-off area to the preschool entrance, minimizing conflicts between vehicles and pedestrians. Marked crosswalks on Galway Drive provide safe neighborhood access, while the South City Shuttle (Orange Route) and nearby SamTrans routes support transit accessibility. The site design and location are therefore consistent with circulation system policies for all modes.

The SSFMC Section 20.330.004 (Development on Lots Divided by District Boundaries), Table 20.330.004 (Required On-Site Parking Spaces), and Chapter 20.350 (Standards and Requirements for Specific Uses and Activities) require daycare centers to provide bicycle parking facilities as part of the site plan review process. Again, the SSF 2040 General Plan Mobility Element (Action MOB-5.1.3) further emphasizes the expansion of bicycle parking at activity centers to promote cycling. The proposed Project currently includes the installation of a small bicycle parking area that can accommodate up to eight bicycles, which meets the City's short-term parking demand (SSFMC 20.330.007 – Bicycle Parking). However, the proposed Project currently does not include any provision for long-term parking. Consistent with the SSFMC, the proposed Project should provide at least two long-term secure bicycle stalls for staff that involves secure, weather protected storage such as a bike room or enclosed bicycle locker. Incorporating these facilities will improve multimodal access and support consistency with the City's circulation system policies. **(Less than Significant)**

[99] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact TRANS-3, p. 3.14-44

Table 5-5. Project Consistency with Plans, Ordinances, and Policy Summary

Plan/Ordinance/Policy	Project Consistency
City of South San Francisco 2040 General Plan Update Mobility Element	**Goal MOB-4:** South San Francisco's land use and transportation actions reduce vehicle miles traveled (VMT) and greenhouse gas emissions. • Action MOB-4.1.1: Use site plan review to improve connectivity. • Action MOB-5.1.3: Expand bicycle parking at activity centers. The proposed Project includes a bike parking facility to promote cycling. The proposed Project is consistent with the SSF 2040 General Plan Goal as it involves an expansion and relocation within the same vicinity as the existing site. As described in checklist item B, the additional VMT generated by the expansion will be minimal. The proposed Project also meets the bicycle parking requirements outlined in the municipal code. Hence, the proposed Project is Consistent with the SSF 2040 General Plan.
Active South City Plan	**Upgraded Crossings and Bikeways along Westborough Boulevard and Galway Drive** By providing on-site sidewalks, ADA stalls, and bicycle parking, the proposed Project complements these planned City investments and supports broader goals to expand safe routes for walking and cycling to schools and community facilities. Hence, the Project is consistent with the Active South City Plan.
South San Francisco Municipal Code	**Section 20.330.004.A Required Parking Spaces – Maximum Number of Spaces Required.** As per Table 20.330.004 in the SSFMC, the maximum number of parking spaces required for the Day Care Center is one per employee, plus additional parking as provided in the Pick-Up/Drop-Off Plan required pursuant to Chapter 20.350 (Standards and Requirements for Specific Uses and Activities). **Section 20.350.004: Standards and Requirements for Specific Uses and Activities – Day Care Centers.** **D. Pick-up/Drop-off Plan.** A plan and schedule for the pick-up and drop-off of children or clients shall be provided for review and approval by the Chief Planner. The plan shall demonstrate that adequate parking and loading are provided on-site to minimize congestion and conflict points on travel aisles and public streets. The plan shall also demonstrate that increased traffic will not cause traffic levels to exceed those levels customary in residential neighborhoods except for higher traffic levels during the morning and evening commute. The plan shall include an agreement for each parent or client to sign, which includes, at a minimum: 1. A scheduled time for pick-up and drop-off with allowances for emergencies. 2. Prohibitions of double-parking, blocking driveways of neighboring houses, or using driveways of neighboring houses to turn around. As discussed earlier, the proposed Project is consistent with SSFMC vehicle and bicycle parking requirements.

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the Project will not conflict with any City plan, ordinance, or policies addressing the circulation systems bicycle, pedestrian, circulation, and transit facilities (CEQA Checklist Question 5.XVI.b). This impact would be less than significant, and no mitigation is required.

c) Substantially Increase Transportation Hazards

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact TRANS-4) determined that implementation of the SSF 2040 General Plan would modify the existing transportation network to accommodate existing and future users, which could change travel patterns or traveler expectations. For example, the General Plan EIR explains that SSF 2040

General Plan implementation would increase vehicle trips on city freeway ramps, which could exacerbate vehicle queues on ramps already in excess of their storage capacity.[100]

The General Plan EIR identified several policies that would reduce the impacts to transportation patterns, which includes completing 25 circulation improvements. For example, SSF 2040 General Plan Policy MOB-2-1 calls for incorporating complete street improvements into all new development projects and Policy MOB-5-1 calls for expanding the City's low-stress bicycle and pedestrian network. General Plan EIR MM TRANS-4 requires the City to work with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections that help manage off-ramp queues.

Nevertheless, even with mitigation implemented, given uncertainties around specific operational conditions and the ability to mitigate those conditions, implementation of the SSF 2040 General Plan could result in significant and unavoidable impacts causing traffic hazards.

PROJECT ANALYSIS

Land Use Compatibility and Circulation Safety

The Project site is currently occupied by a public restroom, maintenance yard, portions of a park maintenance road, small, landscaped areas, and associated community-serving facilities within Westborough Park. Following redevelopment, the Project site would continue to support the same overall community-serving use by accommodating the City's preschool program and associated recreational and park functions. Because the proposed Project does not introduce a new land use or alter the fundamental function of the Project site, there would be no change in land use relative to existing conditions.

School uses within established residential neighborhoods are inherently compatible, and the surrounding area already functions as a park- and community-centered environment. Preschool operations generate predictable, low-speed traffic patterns that are typically supported within residential settings. As such, the proposed Project would not introduce any incompatible uses or increase transportation hazards. Instead, the proposed Project's modernized layout featuring pedestrian paths, dedicated receiving stalls, and improved access design would enhance safety for both park users and residents compared to existing conditions.

Geometric Design

Six dedicated pick-up/drop-off stalls are located adjacent to the preschool entrance and connected by sidewalk, eliminating the need for children to walk through parking aisles. The proposed Project's circulation system intends to keep the current partial one-way driveway with a single entry near the proposed school site and two exits onto Galway Drive.

Since caregivers are required to park and personally escort each child into the building for check-in, rather than using curbside drop-off, minimal queuing is anticipated at the Project driveway. In the rare instance of queuing during parking turnover, the 82-foot driveway section between the first drop-off stall and the public sidewalk would accommodate up to four queued vehicles. To discourage parking within the driveway, a red curb and landscaped strip will be installed to prevent vehicles from blocking access. Additional details on the pick-up and drop-off procedures are provided in the peak morning period included in Appendix D. Considering these procedures, no off-site queuing along Galway Drive is expected.

[100] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact TRANS-4, p. 3.14-48

The existing crosswalks on Galway Drive provide pedestrian connections from adjacent residential neighborhoods, consistent with the SSF 2040 General Plan's school and community zone safety priorities. The parking lot currently experiences approximately 30% utilization during normal school hours, ensuring available capacity and reducing the likelihood of potential conflicts or hazards, such as double parking, resulting from overflow activity.[101]

The proposed Project would not modify the existing circulation system or introduce new geometric design features that would result in hazards. Sight distance at the driveways is not expected to change from what is available under existing conditions and is expected to be adequate for drivers exiting the Project site and for pedestrians crossing the driveways.

Additionally, City design standards require clear sight distance at driveway entries, generally with landscaping and other features maintained between 3 and 7 feet in height. Landscaping within the parking lot and along driveways will be maintained to preserve required sight lines.

Since the proposed Project involves relocation and expansion of the existing preschool use within Westborough Park, the Project use is compatible with the surrounding use.

For the above reasons, the proposed Project would not include any uses that are incompatible with the surrounding land use or existing roadway system. Therefore, the proposed Project is not expected to result in a substantial increase to hazards, and the proposed Project's impacts to hazards would be less than significant under Existing plus Project conditions, and less than cumulatively considerable under Cumulative plus Project conditions, and no mitigation is required. **(Less than Significant)**

CONCLUSION

Consistent with the conclusions of the General Plan EIR, the proposed Project will not substantially increase transportation hazards due to a geometric design feature or other transportation hazard (CEQA Checklist Question 5.XVI.d). This impact would be less than significant, and no mitigation is required.

d) Emergency Access

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact TRANS-5) acknowledges that SSF 2040 General Plan implementation will alter land use patterns and increase travel demand in the city. The proposed circulation improvements identified in the SSF 2040 General Plan would improve connectivity and promote emergency access.[102]

In addition to the previously identified SSF 2040 General Plan policies, such as Policy MOB-2-1 calling for complete streets, Policy SA-16.4 calls for coordination with the SSFFD and SSFPD to ensure that public services can accommodate growth in the East of 101 subarea. These policies will ensure adequate emergency access across the City. The General Plan EIR recognizes that the implementation of the City's TDM Ordinance will reduce the amount of VMT generated by new development and, thus, reduce traffic congestion, which will inherently improve emergency access. The General Plan EIR concludes that, following implementation of these policies, impacts to emergency access will be less than significant.

[101] City of South San Francisco. Staff Observation and Dorman Associates, Parking Management Plan (11.11.2025)

[102] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact TRANS-5, p. 3.14-50

PROJECT ANALYSIS

Emergency access to Westborough Park would continue to be provided by two exit driveways and a circulation loop designed to meet City Fire Code standards for width and turning radii. The parking layout preserves clear lanes for emergency vehicles, and the Project site is directly adjacent to South San Francisco Fire Station 64, thus ensuring rapid emergency response times. These features demonstrate compliance with both the SSF TA Guidelines and SSF 2040 General Plan goals related to safe and reliable emergency access. Therefore, the proposed Project would result in adequate emergency access, and the proposed Project's impacts to emergency access would be less than significant**. (Less than Significant)**

CONCLUSION

The proposed Project will not exacerbate emergency access impacts or result in inadequate emergency access (CEQA Checklist Question 5.XVI.e) beyond that identified in the General Plan EIR. This impact would be less than significant, and no mitigation is required.

CEQA Conclusions Pertaining to Transportation

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant transportation impacts identified in that prior Program EIR. The proposed Project would not result in new significant impacts related to transportation that were not previously identified in the General Plan EIR. No further environmental analysis of the Project pertaining to the topic of transportation is required.

XVII. Tribal Cultural Resources

Would the Project: Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Regulations	Resulting Level of Significance
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	LTS	■	□	General Plan Policy ES-10.5	LTS
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	LTS	■	□	General Plan Policy ES-10.5	LTS

Information related to the Project and the Project site in the Tribal Cultural Resources section of this CEQA Checklist has been derived from the Cultural Resources Technical Report prepared for the Project.[103]

a)–b) Tribal Cultural Resources

SSF 2040 GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that the SSF 2040 General Plan would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k). In February 2022, as part of its efforts toward preparation of the General Plan EIR, the City sent a letter to the NAHC to determine whether any sacred sites within South San Francisco are listed on the Sacred Lands File (SLF). The response from the NAHC, received on March 27, 2022, indicated that the search returned negative results for tribal cultural resources. A separate records search conducted at the Northwest Information Center (NWIC) identified 15 listed prehistoric sites that meet the definition of a tribal cultural resource.

In accordance with requirements promulgated by SB 18 and AB 52, the City notified the Amah Mutsun Tribal Band, Coastanoan Rumsen Carmel Tribe, Indian Canyon Mutsun Band, Muwekma Ohlone Indian Tribe of San Francisco Bay, Ohlone Indian Tribe, and Wuksache Indian Tribe/Eshom Valley Band of its proposed SSF 2040 General Plan and invited the tribes to participate in consultation. No responses to that invitation were received.

[103] SWCA Environmental Consultants (SWCA), *Cultural Resources Technical Report for the Westborough Preschool Expansion Project, South San Francisco San Mateo County, California*, 2025.

The General Plan EIR noted that it is possible for subsurface excavation activities to encounter previously undiscovered tribal cultural resources, and therefore unidentified tribal cultural resources could be adversely affected by development. The General Plan EIR determined that the SSF 2040 General Plan does not directly propose any adverse changes to any recorded tribal cultural resources, but that future development pursuant to the SSF 2040 General Plan could affect known or previously unidentified tribal cultural resources. The potential for additional undiscovered eligible tribal cultural resources to be present varies by location, with the waterfront and areas around Colma and San Bruno Creeks having the greatest potential for buried tribal cultural resources to be present. The SSF 2040 General Plan includes policies and actions intended to conserve and reduce impacts to tribal cultural resources. By adhering to the policies and actions in the General Plan, specifically Policy ES-10.5, as well as state provisions pursuant to SB 18 and AB 52, potential impacts to existing or undiscovered eligible tribal cultural resources were found to be reduced to less than significant.

PROJECT ANALYSIS

The PRC requires a lead agency to consult with California Native American tribes that request consultation and that are traditionally and culturally affiliated with the geographic area of a proposed project. Tribal consultation must take place prior to the release of a ND, an MND, or an EIR for a project. That consultation took place pursuant to the General Plan EIR process and yielded no indication of additional known areas of tribal cultural resources within the vicinity of the Project site. As a project consistent with the SSF 2040 General Plan and the General Plan EIR, no subsequent ND, MND, or EIR is required of the proposed Project, and therefore no further consultation is required.

Based on a review of information on Native American resources in the Project vicinity, including the results of CHRIS records searches and an SLF search through the NAHC, as well as a review of environmental site conditions, historic aerials, and relevant literature, there are no recorded tribal cultural resources within 0.5 mile of the Project site. Additionally, an intensive pedestrian survey was conducted that did not identify any evidence of resources, artifacts, or features within the Project site. Letters and phone calls were also made to individuals identified by the NAHC who possibly would have knowledge of tribal cultural resources within the Project area; no tribal cultural resources were identified in response to these outreach efforts. Accordingly, the proposed Project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in in the CRHR, or in a local register of historical resources as defined in PRC Section 5020.1(k).

The Project site is mostly covered in urban overlay, comprised of turf grasses, concrete, asphalt, landscaping, and structures with variable construction dates. As such, there is a low potential to encounter intact undiscovered subsurface tribal cultural resources within the Project site. Despite this low archaeological sensitivity, it is possible for undiscovered resources to be present that the City determines to be significant pursuant to criteria set forth in PRC Section 5024.1(c). As accounted for in the General Plan EIR, the proposed Project includes demolition and construction activities that could encounter such resources, if present underneath the Project site.

As discussed under Section 5.V, *Cultural Resources*, in the event that construction or grading activities result in the discovery of potentially significant archaeological resources, including tribal cultural resources, SSF 2040 General Plan Policy ES-10.5 requires that all work within 100 feet of the discovery shall cease, the City shall be notified, and the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures. As stipulated by Policy ES-10.5, work may only resume when appropriate protections are in place and the protections have been approved by the City Economic and Community Development Department. The Cultural Resources Technical Report found that adherence with Policy ES-10.5 would be sufficient to ensure that Project impacts to any potentially significant resources pursuant to PRC Section 5024.1 that are encountered during Project construction would be less than significant, and no mitigation would be required. **(Less than Significant Impact)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the project would result in less-than-significant impacts to tribal cultural resources with adherence to the policies identified in the SSF 2040 General Plan, specifically Policy ES-10.5. Therefore, the proposed Project would not cause any new specific effects or more significant effects than identified for the SSF 2040 General Plan, and no additional environmental review of the project as relates to tribal cultural resources would be required.

CEQA Conclusions Pertaining to Tribal Cultural Resources

Based on the analysis, findings, and conclusions of the General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts to tribal cultural resources as identified in that Program EIR, nor would it result in new significant impacts to tribal cultural resources that were not previously identified. The proposed Project would have specific effects associated with demolition and construction activities. As documented above, these specific impacts would be less than significant with adherence to SSF 2040 General Plan Policy ES-10.5, and the proposed Project would not result in any more significant effects in comparison with the General Plan EIR. Accordingly, no additional environmental review of the proposed Project as it relates to tribal cultural resources would be required.

XVIII. Utilities and Service Systems

Would the Project:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	LTS	■	□	–	LTS
b) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	LTS	■	□	–	LTS
c) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? Comply with federal, state, and local statutes and regulations related to solid waste?	LTS	■	□	SSFMC 15.60	LTS
d) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	LTS	■	□	SSFMC 14.14	LTS

General Plan EIR Policies and Mitigation Measures

The General Plan EIR identified the following SSF 2040 General Plan policies and, where applicable, mitigation measures that address potential impacts to utilities and service systems resulting from buildout of the SSF 2040 General Plan. These policies and mitigation measures apply to all subsequent development projects in the city, including the proposed Project, and are intended to ensure that impacts to utilities and service systems are avoided, minimized, or reduced to a less-than-significant level.

SSFMC Chapter 15.60: Construction and Demolition Waste Management Plan. Pursuant to Chapter 15.60 of SSFMC, a Waste Management Plan for the proposed Project will be required to be prepared and submitted to the City Building Official, demonstrating how the contractor intends to reduce the amount of waste disposed in a landfill.

- Contractors are encouraged to make every structure planned for demolition available for deconstruction, salvage, and recovery prior to demolition and to recover the maximum feasible amount of salvageable designated recyclable and reusable materials prior to demolition, but at least at the rate set forth in CALGreen.
- The diversion requirements shall be met by submitting and following a waste management plan that includes deconstructing and salvaging all or part of the structure as practicable; directing

100% of inert solids to reuse or recycling facilities approved by the City; and either taking all mixed construction and demolition debris to mixed construction and demolition debris recycling facilities, or source separating non-inert materials and directing them to recycling facilities approved by the City, and taking the remainder to a facility for disposal.

- Every contractor shall submit a properly completed waste management plan as an integral part of the building or demolition permit application.

SSFMC Chapter 14.14: Sewer Lateral Construction, Maintenance and Inspection. Pursuant to SSFMC Chapter 14.14, the Project applicant will be responsible for constructing, operating, and maintaining all individual sanitary sewer laterals from each new building to the City sanitary sewer main. Any new sewer lateral connections must obtain all applicable permits, including encroachment permits, building permits, and/or plumbing permits.

SSFMC Section 14.12: Sewer Rates. Pursuant to California Health and Safety Code Section 5470 et seq. and SSFMC Section 14.12, the proposed Project must pay established City sewer system fees for all domestic and commercial uses, which fund ongoing operation, maintenance, and capacity upgrades of the municipal sewage system.

a) Water Supplies

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR identified that the City receives most of its water supply from California Water Service (Cal Water), with a small area (the Westborough neighborhood) serviced by the WWD. The General Plan EIR relied on a threshold that a significant impact would occur if water demand for development facilitated by the SSF 2040 General Plan could not be met by the providers' existing entitlements and water supply resources. The General Plan EIR (Impact UTIL-2) found that sufficient water supplies would be available to serve the reasonably foreseeable future development pursuant to the SSF 2040 General Plan buildout during normal, dry and multiple dry years.[104]

The WWD is a special district serving about 12,500 residents within a 1-square-mile area of South San Francisco's Westborough neighborhood, bordered by Skyline Boulevard, Daly City, I-280, and San Bruno. The WWD operates roughly 4,000 service connections and maintains a distribution system with three pressure zones, five pumps, three storage tanks totaling 5.8 million gallons (MG), and a shared 0.5 MG tank with the North Coast County Water District (NCCWD). According to the General Plan EIR, the system's total storage capacity can supply approximately six days of emergency water under current demand levels.

The WWD's sole source of water is the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS), with an Individual Supply Guarantee (ISG) of 482 MG per year. From 2016 through 2020, WWD used about 267 to 329 MG annually, representing 56% to 68% of its allocation. Residential customers account for about 71% of total demand. Current and projected supplies are sufficient to meet normal-year demand through 2045; however, the WWD anticipates potential shortfalls during single- and multiple-dry years associated with implementation of the Bay-Delta Plan Amendment.

To address potential shortages, WWD prepared a Water Shortage Contingency Plan (Appendix I of the *Public Review Draft 2020 Urban Water Management Plan for Westborough Water District*

[104] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact UTIL-2, p. 3.15-30

[WWD UWMP])[105] consistent with California Water Code 10632. The plan defines six shortage stages, with measures ranging from voluntary conservation and water-use restrictions to Stage 6 mandatory reductions exceeding 50% in severe drought or emergency conditions. the WWD coordinates regionally with the Bay Area Water Supply and Conservation Agency and SFPUC to enhance supply reliability and may amend the WWD UWMP as new information becomes available.

Overall, the WWD has adequate normal-year supplies and emergency interties with Daly City and NCCWD, providing redundancy during local supply interruptions.

Under state and county water conservation ordinances, each jurisdiction within the water service area is required to conserve its water use through water-efficiency measures. As required by the SSF 2040 General Plan, the City will continue to coordinate with regional water districts regarding water conservation efforts, demand management measures promoted by the water districts, compliance with current CALGreen measures, and 2022 SSF CAP measures promoting efficient indoor and outdoor water use. These measures would serve to reduce water use and demand overall, and especially during drought years.

In conclusion, the General Plan EIR determined that both Cal Water and WWD have considered projected growth and have determined that sufficient water supplies are anticipated to be available to accommodate future demands of development associated with SSF 2040 General Plan buildout within their respective service areas. Compliance with future water reductions under dry year scenarios, compliance with the policies and actions in the SSF 2040 General Plan, compliance with SB 610 and SB 221 or provision of will-serve letters, and compliance with existing water conservation regulations and drought plans would ensure that impacts related to water supply remain less than significant.

PROJECT ANALYSIS

According to the General Plan EIR, the Westborough planning subarea, served by the WWD, is projected to have adequate water supplies to meet existing and future demand under full SSF 2040 General Plan buildout. WWD's service area is distinct from the remainder of the city, which is served by Cal Water; however, the WWD UWMP accounts for the modest growth expected within Westborough, including institutional and park improvements consistent with existing land use and zoning. The Project site, designated PR under the SSF 2040 General Plan and Zoning Map, is therefore already included in the growth and demand projections analyzed by the WWD and the General Plan EIR.

The proposed Project would result in incremental and temporary water demand increases during construction, followed by low operational water use consistent with the existing use type. The proposed Project will be required to implement water efficiency and conservation measures, including compliance with CALGreen standards, the City's Model WELO, and applicable 2022 SSF CAP policies promoting efficient indoor and outdoor water use. These measures, along with WWD's demand management and drought contingency programs, would ensure the Project's water consumption remains efficient and consistent with the WWD's long-term supply planning.

Therefore, given that the proposed Project is consistent with the SSF 2040 General Plan and PR zoning designations and its anticipated demand has been incorporated into WWD's existing and future supply projections, it is reasonable to conclude that WWD has sufficient water supplies available to serve the proposed Project during normal, single-dry, and multiple-dry year conditions.

[105] Westborough Water District (WWD). 2021. *Public Review Draft 2020 Urban Water Management Plan for Westborough Water District*. May. Available at: https://www.westboroughwater.org/article/uwmp2020.php. Accessed November 2025.

Water Conservation and Use Regulations

Consistent with the regulatory framework and assumptions of the General Plan EIR, the proposed Project would comply with all applicable state and local regulations that govern water conservation and use efficiency. The WWD incorporates the effects of these requirements in the WWD UWMP and water demand projections; therefore, the proposed Project's compliance would ensure its water use remains consistent with or below those projections.

Under CALGreen, all new buildings are required to install high-efficiency plumbing fixtures and water-efficient appliances. The proposed Project's new preschool facility would be required to meet or exceed these standards, including the use of low-flow faucets, toilets, and irrigation systems, thereby reducing indoor and outdoor water demand relative to older facilities.

Additionally, the City has adopted the State Model WELO, which applies to all new development. Pursuant to SSFMC Section 20.300.008 (Landscaping) and WWD Ordinance 59 (Conservation in Landscaping), the proposed Project must prepare a Water Efficient Landscape Worksheet documenting the irrigation methods, plant factors, and hydrozones used in landscape design. The worksheet must demonstrate that the proposed Project's evapotranspiration adjustment factor (ETAF) does not exceed 0.45 for nonresidential areas and that the Estimated Total Water Use (ETWU) is below the Maximum Applied Water Allowance (MAWA). These standards ensure landscape water use remains efficient and consistent with regional water conservation objectives.

As a customer of the WWD, the proposed Project would also be subject to the WWD's Water Shortage Contingency Plan (WWD UWMP Appendix I), which establishes mandatory water-use restrictions during drought conditions or supply shortages. Depending on regional conditions, the WWD may impose irrigation schedules, usage limits, or other conservation measures, all of which would apply equally to the proposed Project.

Through compliance with CALGreen, the State Model WELO, and WWD water shortage contingency regulations, the proposed Project's overall water consumption would remain within the projections and supply capabilities identified in the WWD UWMP and General Plan EIR. Accordingly, Project water demand would be consistent with regional conservation goals and would represent a less-than-significant impact on water supply resources**. (Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to implement water saving and conservation measures. These conservation measures would control the Project water demands to a level fully contemplated in the WWD UWMP. The proposed Project would not result in exceeding water supplies available to serve the proposed Project and reasonably foreseeable future development during normal, dry, and multiple dry years (CEQA Checklist Question 5.XVIII.a), and no mitigation is required. The proposed Project would not generate a substantial increase in the severity of water-related impacts or in a new significant water supply impact.

b) Wastewater Treatment

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact UTIL-3) found that the wastewater treatment providers (the City Public Works Department and the WWD/NSMCSD) would have adequate capacity to serve new development pursuant to the SSF 2040 General Plan buildout, in addition to the provider's existing commitments.

Collection System

The WWD operates approximately 20 miles of gravity sanitary sewer mains, 0.75 mile of force main, and three sewer lift stations: Avalon, Westborough, and Rowntree. Each station includes two to three pumps, which convey wastewater from the local collection system. The WWD contracts with the City of Daly City's NSMCSD for all maintenance, emergency response, and treatment services; the WWD itself does not directly maintain or operate the sewer infrastructure.

Average flows from the WWD service area are approximately 598,000 gallons per day (gpd) during wet weather and 648,000 gpd during dry weather, equating to about 222 MG collected in 2020. Since 2010, the WWD has recorded only one sanitary sewer overflow, attributed to a power failure, indicating a generally reliable and well-maintained collection system.

Treatment System

Wastewater collected by WWD is treated at the NSMCSD treatment plant, located at 153 Lake Merced Boulevard in Daly City. This regional facility serves Daly City, Broadmoor Village, part of Colma, the WWD area of South San Francisco, and the San Francisco County Jail in San Bruno. The treatment plant provides secondary treatment and discharges treated effluent to the Pacific Ocean via an ocean outfall.

The facility has a design capacity of 10.3 million gallons per day (MGD) and an average flow of 5.6 MGD, with the ability to handle up to 15 MGD during peak wet-weather events. A tertiary treatment facility, completed in 2004, further refines a portion of the secondary effluent for recycled water use in Daly City irrigation systems and in-plant operational needs, contributing to regional water conservation and reuse goals.

Overall, the WWD wastewater system provides adequate collection and treatment capacity, with contractual service through the NSMCSD ensuring regional consistency, reliability, and compliance with applicable wastewater discharge regulations. The General Plan EIR concludes that, following implementation of these policies, impacts to wastewater treatment will be less than significant.

PROJECT ANALYSIS

The proposed Project would include the redevelopment of an existing portion of Westborough Park with a new preschool facility and replacement of a public restroom. Wastewater generated during operation would consist primarily of domestic wastewater from restrooms and janitorial uses, consistent with the existing park and preschool use. The Project site is located within the WWD service area, which contracts with the NSMCSD for wastewater collection, conveyance, and treatment.

The WWD UWMP and General Plan EIR determined that the Westborough service area has sufficient collection and treatment capacity to serve existing and future development under full SSF 2040 General Plan buildout. The NSMCSD treatment plant, located in Daly City, has an average daily flow of 5.6 MGD and a permitted capacity of 10.3 MGD, leaving adequate reserve capacity to serve incremental increase produced by the proposed Project.

The proposed Project would also be required to comply with several regulatory measures that minimize wastewater flows and ensure proper system management:

- **Water Efficiency:** As described in the water supply section, CALGreen requirements for high-efficiency plumbing fixtures and water-saving appliances directly reduce indoor water use and, by extension, wastewater generation.

- **Sewer Fees:** Pursuant to California Health and Safety Code Section 5470 et seq. and SSFMC Section 14.12, the proposed Project must pay established City sewer system fees for all domestic and commercial uses, which fund ongoing operation, maintenance, and capacity upgrades of the municipal sewage system.
- **Wastewater Discharge Permits:** Under SSFMC Section 14.08.100 (Wastewater Discharge Permits), any user discharging to the City's wastewater system must comply with pretreatment standards to prevent pollutant introduction that could interfere with collection or treatment operations. While the proposed Project would not constitute a "significant industrial user," this regulatory framework ensures all discharges meet water quality requirements and protect the integrity of the treatment process.

Compliance with these requirements will ensure that wastewater generation from the proposed Project remains minimal and consistent with the assumptions of the General Plan EIR. Additionally, because the proposed Project is consistent with the PR land use designation and Westborough planning subarea projections, its wastewater demands have already been accounted for in WWD and NSMCSD system planning.

The proposed Project would not require construction or expansion of off-site wastewater collection or treatment facilities and would not exceed the capacity of the existing WWD/NSMCSD system. Through compliance with applicable regulatory requirements and City standards, impacts related to wastewater collection, treatment, and disposal would be less than significant, and no mitigation is required.
(Less Than Significant)

CONCLUSION

Consistent with the findings of the SSF 2040 General Plan, the Project wastewater demands would not result in a determination by the wastewater treatment provider that it does not have adequate capacity to serve the proposed Project's projected demand in addition to the provider's existing commitments (CEQA Checklist Question 5.XVIII.b), and the proposed Project's impact on wastewater treatment would be less than significant. The proposed Project would not generate a substantial increase in the severity of wastewater impacts or in a new significant impact to the provision of wastewater treatment services.

c) Landfill Capacity and Compliance with Solid Waste Regulations

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact UTIL-4) determined that implementation of the SSF 2040 General Plan would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. In addition, new development pursuant to the SSF 2040 General Plan would comply with federal, state, and local statutes and regulations related to solid waste.[106]

Development and growth in the city would increase the generation of solid waste (both temporary construction and permanent operation waste), but implementation of SSF 2040 General Plan policies and actions would reduce and divert solid waste, including requirements for 75% waste diversion for municipal construction and demolition projects, maintenance and regular updates of the City's waste reduction plans and programs to ensure consistency with California's waste reduction goals, and education and technical assistance programs to help all residents and businesses to compost and recycle. In accordance with City requirements, development that does occur would be required to be served with

[106] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact UTIL-4, p. 3.15-38

solid waste, recycling, and green waste services provided by the City's franchise hauler. Additionally, construction and demolition debris from new development would be required to be recycled. Statewide ordinances require waste reduction, recycling, and diversion, and would be applicable to development occurring pursuant to the SSF 2040 General Plan.

Construction waste would be temporary and required to be diverted from landfills in accordance with SSFMC Chapter 15.60 (Recycling and Diversion of Debris from Construction and Demolition). Operationally, development pursuant to the SSF 2040 General Plan was found to generate approximately 191 tons per day of solid waste at full buildout. For the solid waste that would be landfilled, four landfills serving the City have a combined remaining capacity of 43.43 million cubic yards. The solid waste generated by the SSF 2040 General Plan represents only approximately 0.09% of the remaining capacity of these servicing landfills. This capacity would be more than sufficient to accommodate the solid waste generated by implementation of the SSF 2040 General Plan. Therefore, the General Plan EIR determined this impact to be less than significant.

PROJECT ANALYSIS

During construction, the proposed Project will generate solid waste consisting primarily of demolition debris such as concrete, asphalt, metal, lumber, and miscellaneous building materials. Construction waste would be typical for a small-scale redevelopment project of this type and would occur over a limited duration. Consistent with 2025 CALGreen Section 5.408, the Project contractor would be required to develop and implement a Construction Waste Management Plan to divert at least 65% of nonhazardous construction and demolition waste from landfills through reuse and recycling. Compliance with this requirement would substantially reduce the volume of construction-related waste disposed of at regional landfill facilities.

During operation, the proposed Project's employees and students would generate typical solid waste, including garbage, recyclables, and green waste, at levels comparable to the existing preschool and park use on-site. The Project site is served by South San Francisco Scavenger Company (SSFSC), which collects and transports solid waste, recyclables, and organics.

The proposed Project will also be required to comply with all applicable state and local solid waste reduction and diversion regulations, including:

- As noted above, CALGreen measures reduce construction and operational waste generation through material efficiency and recycling standards.
- **SB 1383 (Short-Lived Climate Pollutant Reduction Act):** Requires organic waste diversion from landfills and recovery of at least 75% of organic material through composting or anaerobic digestion programs.
- **SSFMC Chapter 8.16 (Solid Waste Collection):** Establishes requirements for waste separation, collection, and recycling for residential, commercial, and institutional uses.

Through compliance with these measures, the proposed Project would reduce its contribution to regional landfill disposal volumes and align with the City's waste reduction and diversion goals.

Waste generated by the proposed Project during both construction and operation would be minor in volume relative to citywide totals, would not exceed the capacity of existing permitted disposal facilities, and would be managed in full compliance with applicable federal, state, and local solid waste regulations. Implementation of mandatory CALGreen and City waste diversion standards would ensure that recyclable and compostable materials are recovered to the maximum extent feasible. Therefore, impacts related to

solid waste generation and landfill capacity would be less than significant, and no mitigation is required. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to implement existing regulatory requirements related to waste management and landfill diversion, and these regulatory requirements would reduce impacts to public utilities or services. The proposed Project would not generate solid waste in excess of state or local standards, generate solid waste in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals and would comply with federal, state, and local statutes and regulations related to solid waste (CEQA Checklist Question 5.XVIII.c). The impact would be less than significant, and no mitigation is required.

d) Construction of New Utility Service Infrastructure

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR (Impact UTIL-1) determined that implementation of the SSF 2040 General Plan would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects.[107]

Water Infrastructure

The General Plan EIR found that most new development pursuant to the SSF 2040 General Plan is expected to be infill, which would rely on the existing water distribution network that has sufficient capacity to convey available water supplies. As such, implementation of the SSF 2040 General Plan was not found to result in the need to construct or expand water supply and treatment facilities that have not already been described and accounted for in the *2020 Urban Water Management Plan: South San Francisco District* [108] (Cal Water UWMP) and WWD UWMP. The General Plan EIR also cited the Cal Water UWMP and WWD UWMP, which state that there are currently no planned future water supply projects or programs that are expected to provide a quantifiable increase to the water supply. However, Cal Water is currently in the process of developing a regional water supply reliability study using integrated resource planning practices to create a long-term supply reliability strategy through 2050 for Cal Water districts in the Bay Area. It is anticipated that this study will identify feasible water supply projects that may benefit the South San Francisco District. The SFPUC has been implementing its Water System Improvement Plan (WSIP) since it was adopted in 2008, and it includes several water supply projects to address Level of Service Goals and Objectives. The SFPUC's Alternative Water Supply Planning Program is also being implemented to explore other projects that would increase overall water supply resiliency. Individual infrastructure improvements that may occur under the applicable UWMPs would be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Therefore, the General Plan EIR determined that no new or expanded water facilities would be, and this impact would be less than significant. The proposed Project would not generate a substantial increase in the severity of impacts to water-related infrastructure or in a new significant impact.

[107] City of South San Francisco, *SSF 2040 General Plan Draft EIR*, 2022, Impact UTIL-1, p. 3.15-28

[108] California Water Service (Cal Water). 2021. *2020 Urban Water Management Plan: South San Francisco District*. June. Available at: https://www.calwater.com/docs/uwmp2020/SSF_2020_UWMP_FINAL.pdf. Accessed November 2025.

Wastewater Infrastructure

The General Plan EIR determined that future development pursuant to the SSF 2040 General Plan would be located within the urban framework of the city and near existing wastewater infrastructure. As such, buildout of the SSF 2040 General Plan would not result in the need to construct or expand wastewater collection and treatment facilities that have not already been described and accounted for in the applicable Sewer System Master Plans. Therefore, the SSF 2040 General Plan would not result in insufficient wastewater collection and treatment, no new or expanded wastewater treatment facilities would be needed, and this impact was found to be less than significant. The proposed Project would not generate a substantial increase in the severity of impacts to wastewater treatment facilities or associated infrastructure or in a new significant impact.

Storm Drainage Capacity

The General Plan EIR determined that, pursuant to SSF 2040 General plan policies, new development would be required to install on-site storm drainage infrastructure that would detain stormwater and release runoff at a rate no greater than the pre-development condition of the Project site (see further discussion in Section 5.X, *Hydrology and Water Quality*, of this CEQA Checklist). City requirements and policies would ensure that runoff would not inundate downstream storm drainage facilities such that new or expanded facilities would be required, and this impact was found to be less than significant.

Electric Power, Natural Gas, and Telecommunications

The General Plan EIR indicated that electricity, natural gas, and telecommunications utilities prepare long-range plans to accommodate projected growth in their service areas. Telecommunications companies continually expand their infrastructure to serve the growing population. These planning efforts take into account growth projections. Because the SSF 2040 General Plan would not result in unplanned growth, the majority of growth would be infill, and because the utility providers take into consideration all future growth projections in their planning efforts, the General Plan EIR concluded that new development pursuant to the SSF 2040 General Plan would not be expected to require or result in new or expanded electricity, natural gas, or telecommunications facilities beyond those already planned. This impact was found to be less than significant.

PROJECT ANALYSIS

The proposed Project would connect to existing water, wastewater, and storm drainage infrastructure that exist within the Galaway Drive right-of-way. Additional connections will also be made to existing PG&E electrical power lines and gas mains and telecommunication systems. All unused connections to the utility systems that served the former maintenance building on the Project site will be disconnected and removed. All construction activity (i.e., trenching and installation) will be conducted in conformance with the erosion control dust suppression and water quality requirements as cited in separate sections of this CEQA Checklist. Additionally, the proposed Project will be required to comply with the following regulatory requirements intended to address new utility service infrastructure:

The proposed Project would connect to existing water, wastewater, storm drainage, and utility infrastructure located within the Galway Drive right-of-way, and all unused connections associated with the former maintenance building would be removed. Because the proposed Project would rely on existing infrastructure with sufficient capacity and would comply with all applicable utility regulations and construction standards, it would not require or result in the expansion of existing facilities or construction of new off-site utility systems. Therefore, impacts related to utility service connections would be less than significant, and no mitigation is required. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the General Plan EIR, the proposed Project would be required to fully comply with regulations pertaining to construction-related erosion, water quality, and dust suppression as applicable to new construction, and to implement other existing regulatory requirements related to construction of new utility service infrastructure. These regulatory requirements would reduce impacts associated with the construction or relocation of new utility systems. The proposed Project would not require or result in the relocation or construction of new or expanded infrastructure facilities that could cause significant environmental effects (CEQA Checklist Question 5.VIII.d). The impact would be less than significant, and no mitigation is required.

CEQA Conclusions Pertaining to Utilities and Service Systems

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the Project would not substantially increase the severity of any significant impacts related to utilities or service systems as identified in that prior Program EIR. The proposed Project would not result in new significant impacts related to utilities or service systems that were not previously identified. The General Plan EIR did not identify any mitigation measures related to utilities or service systems that would apply to the Project and none would be required.

XIX. Wildfire

Would the Project: If located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones:	General Plan EIR Findings	Relationship to General Plan EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a) Due to slope, prevailing winds and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of a wildfire?	LTS	■	□	–	No Impact
b) Substantially impair an adopted emergency response plan or emergency evacuation plan?	LTS	■	□	–	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment?	LTS	■	□	–	No Impact
d) Expose people or structures to significant risk, including downslope or downstream flooding or landslides from runoff post-fire slope instability, or drainage changes?	LTS	■	□	–	No Impact

a)–d) Wildfire

GENERAL PLAN EIR CONCLUSIONS

The General Plan EIR determined that no portion of the city lies within or adjacent to State Responsibility Areas (SRAs) or areas classified as Very High Fire Hazard Severity Zones (VHFHSZs). The General Plan EIR found that implementation of the SSF 2040 General Plan would not substantially increase wildfire risk or exposure for people or structures.

The General Plan EIR concluded that future development under the SSF 2040 General Plan:

- Would not expose people or structures to significant wildfire-related risk (Impact WILD-1),
- Would not impair emergency response or evacuation plans (Impact WILD-2),
- Would not exacerbate wildfire risk due to slope, wind, or other factors (Impact WILD-3),
- Would not require new infrastructure that increases fire hazards (Impact WILD-4), and
- Would not expose people or property to post-fire hazards such as flooding or landslides (Impact WILD-5).

Although the General Plan EIR acknowledged that incremental increases in population and development could marginally expand exposure to wildfire hazards, it emphasized that new growth is concentrated in already urbanized areas, far from wildland interfaces. For properties near hillside or open-space areas, the

City requires submittal of a Standard Landscape Plan consistent with the Model WELO, including defensible space and fire-resistant landscaping.

The General Plan EIR further noted that implementation of SSF 2040 General Plan policies, SSFMC provisions, and regional programs such as the San Mateo–Santa Cruz County Community Wildfire Protection Plan (CWPP), San Mateo County Local Hazard Mitigation Plan (LHMP), and County Emergency Operations Plan (EOP), would continue to minimize fire risks and ensure adequate emergency response coordination.

Accordingly, the General Plan EIR concluded that potential wildfire impacts would be less than significant, and that no mitigation is required.

PROJECT ANALYSIS

As shown in Exhibit 3.16-1 (Wildfire Hazard Severity Zones) of the General Plan EIR, the Project site is not located within or adjacent to an SRA or a VHFHSZ. The Project site lies within an entirely urbanized portion of the South San Francisco, surrounded by existing residential neighborhoods, public facilities, and a park. Because the Project site is not within or near a wildland area, the potential for wildfire occurrence or spread is extremely low.

The proposed Project would not expose people or structures to the risk of loss, injury, or death involving wildland fires. The proposed Project's improvements would occur within an already developed site that lacks significant vegetation or steep slopes. There are no topographic, vegetative, or wind-related conditions on or near the Project site that could exacerbate wildfire risks or contribute to the uncontrolled spread of fire.

The proposed Project would also not impair or conflict with adopted emergency response or evacuation plans. Access to the Project site for emergency vehicles would continue to be provided via existing public streets (Galway Drive and Westborough Boulevard).

In addition, the proposed Project would not require the installation or maintenance of infrastructure that could increase fire hazards or result in ongoing impacts to the environment. The proposed Project would connect to existing utility systems within the public right-of-way and would not involve new long utility corridors, fuel management zones, or other facilities usually associated with increased fire risk.

The Project site is generally flat and fully urbanized; therefore, it would not expose people or structures to risks associated with post-fire hazards such as downslope or downstream flooding, landslides, or drainage changes.

The proposed Project is consistent with the findings of the General Plan EIR, which determined that wildfire-related hazards in South San Francisco are minimal due to its urbanized setting and absence of designated fire hazard zones. The proposed Project would not increase wildfire risk, interfere with emergency response, or exacerbate post-fire conditions. Potential wildfire impacts would be less than significant, and no mitigation is required. **(Less than Significant)**

CONCLUSION

Consistent with the findings of the SSF 2040 General Plan, the Project would not have an adverse effect related to wildfire risk.

CEQA Conclusions Pertaining to Wildfire

Based on the analysis, findings, and conclusions of the prior General Plan EIR, implementation of the proposed Project would not substantially increase the severity of any significant impacts related to wildfire as identified in that prior Program EIR. The proposed Project would not result in new significant impacts related to wildfire that were not previously identified.

XX. Mandatory Findings of Significance

		Relationship to General Plan EIR Findings:		Project Conclusions:	
	General Plan EIR Findings	Equal or Less Severe	New or Substantial Increase in Severity	Applicable Standards and Requirements	Resulting Level of Significance
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal? Does the project have the potential to eliminate important examples of the major periods of California history or prehistory?	SU	■	□	General Plan SSFMC California Health and Safety Code PRC Construction General Permit MM AIR-1a, MM AIR-1b, MM BIO-1, MM BIO-2, MM GEO-6, MM HYD-5, MM NOI-1	LTS w/MM
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	SU	■	□	–	LTS w/MM
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	LTS with MM	■	□	–	LTS w/MM

Degrade the Quality of the Environment

The General Plan EIR concluded that the SSF 2040 General Plan would result in significant and unavoidable impacts related to VMT, roadway safety, criteria air pollutants, and the 2017 Clean Air Plan. As documented in Sections 5.III, *Air Quality*, and 5.XVI, *Transportation*, the proposed Project would have a less-than-significant impact on these environmental topics. Furthermore, the analysis in Chapter 5, *Initial Study/CEQA Checklist*, determined that as a whole, the proposed Project's impacts on the environment would be less than significant with implementation of all applicable General Plan EIR mitigation measures and other regulatory requirements. Therefore, the proposed Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The Project would also not eliminate important examples of the major periods of California history or prehistory. Accordingly, no additional environmental review of the project regarding this topic would be required.

Cumulative Impacts

State CEQA Guidelines Section 15183 provides that future projects analyzed in relationship to a prior Program EIR may be excluded from further analysis of off-site or cumulative impacts, if those off-site or cumulative impacts were adequately discussed in the prior Program EIR. The General Plan EIR examined the potential cumulative effects of new development pursuant to the SSF 2040 General Plan. General Plan EIR determined that, for the majority of environmental topics analyzed, cumulative development consistent with the SSF 2040 General Plan would result in environmental impacts that would be reduced to levels of less than significant with implementation of existing regulatory requirements, implementation of policies contained within the General Plan EIR, and additional mitigation measures as identified in the General Plan EIR. However, the General Plan EIR determined that the following list of environmental impacts would be cumulatively significant and unavoidable.

Cumulative Vehicle Miles Traveled

The General Plan EIR concluded that cumulative growth and development throughout the city and the nine-county Bay Area would result in a cumulative increase in VMT as measured in total VMT per service population and as home-based work VMT per employee. Although cumulative development within the South San Francisco would be required to implement TDM measures, an East of 101 Area Trip Cap, and parking requirements to reduce cumulative VMT increases, the effectiveness of the VMT reduction strategies were not able to be quantified in the General Plan EIR analysis, which concluded that the City may not be able to achieve a cumulative reduction in overall VMT to below threshold level, and this cumulative impact was found to be significant and unavoidable.

Cumulative Roadway Safety

The General Plan EIR concluded that cumulative growth and development throughout the city, as well as cumulative development throughout the nine-county Bay Area, would increase vehicle trips on the city's freeway ramps. That traffic would cause vehicle queues to exceed off-ramp storage capacity or exacerbate off-ramps that already experience off-ramp queues exceeding storage capacity, resulting in a potentially significant cumulative impact. Although the City will continue to work with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections that help manage off-ramp queues to minimize queueing hazards, the General Plan EIR concluded that there is uncertainty around specific operational conditions and the ability to mitigate such conditions in a constrained right-of-way. This cumulative impact was found to remain significant and unavoidable.

Conflict with 2017 Bay Area Clean Air Plan

The General Plan EIR concluded that new cumulative development facilitated by the SSF 2040 General Plan would increase VMT by approximately 94% through 2040, whereas population would grow by only approximately 61% during the same period. Forecasted VMT growth would outpace population growth and the General Plan EIR concluded that this imbalance between cumulative VMT and cumulative population growth would be inconsistent with the 2017 Clean Air Plan. Because the effectiveness of identified VMT reduction strategies could not be quantified, the General Plan EIR determined that the City may not achieve cumulative VMT reductions, and this impact was found to be cumulatively significant and unavoidable.

Cumulative Criteria Air Pollutants

The General Plan EIR similarly concluded cumulative VMT growth would result in a cumulatively considerable net increase in criteria pollutants. The General Plan EIR determined there is no reasonable mitigation that can be implemented to keep growth in VMT to a minimum, while also increasing

population. The cumulative increase in VMT was found to result in a cumulatively considerable net increase in criteria air pollutants and ozone precursors, and this cumulative impact was found to remain significant and unavoidable.

Project Contributions

This Initial Study/CEQA Checklist analyzes whether the proposed Project may contribute to cumulative environmental effects as identified in the General Plan EIR. This Initial Study/CEQA Checklist also considers whether mitigation measures, development standards, policies and/or regulations identified in the General Plan EIR would apply to the proposed Project. The analysis in this Initial Study/CEQA Checklist finds that the proposed Project would not have environmental impacts that are unique to the proposed Project, and that the proposed Project's contribution to cumulative effects were fully evaluated and disclosed in the prior General Plan EIR, and that certain mitigation measures, development standards, policies, and ordinances identified in that prior EIR would apply to the proposed Project.

As specifically addressed in Sections 5.III, *Air Quality*, and 5.XVI, *Transportation*, of this Initial Study/CEQA Checklist:

- As a local-serving public facility, the proposed Project would be expected to reduce average trip lengths, which are expected to decrease as families previously traveling farther within the city or outside the city no longer need to travel as far for childcare. None of the other proposed Project improvements are anticipated to result in measurable increases in VMT as they would improve existing facilities and are inherently local serving. For these reasons, the proposed Project would have a less-than-significant, and potentially beneficial, impact on VMT, and would not conflict with the 2017 Clean Air Plan.
- The proposed Project's predicted average daily and annual operational-generated emissions of NO_X, PM_{10}, and $PM_{2.5}$ criteria air pollutants are below the operational significance thresholds as recommended by the Bay Area Air District, and as relied on in the General Plan EIR. Therefore, operational air quality impacts related to a cumulatively considerable net increase of these non-attainment criteria pollutants would be less than significant.
- Once operational, the proposed Project would not increase roadway hazards due to any geometric design features or incompatible land uses. The analysis also found that the proposed Project would not result in significant roadway queuing, and the proposed Project includes improvements to the parking lot and sidewalks that would be expected to improve safety at the Project site. Accordingly, the proposed Project would not contribute to a cumulative roadway safety impact

As demonstrated in this Initial Study/CEQA Checklist, the proposed Project does not have any unique or peculiar effect that would indicate a new significant cumulative impact, or a substantial increase in a previously identified significant cumulative environmental impact. Accordingly, this Initial Study/CEQA Checklist relies on the streamlining provisions of State CEQA Guidelines Section 15183 to address cumulative effects and finds that the proposed Project would not contribute to any cumulative effects not previously disclosed and adequately analyzed in the prior General Plan EIR.

Effects on Human Beings

As discussed in Chapter 5, *Initial Study/CEQA Checklist*, and summarized below, the proposed Project would not result in direct or indirect environmental effects that would cause substantial adverse effects on human beings.

- Construction and operation of the project would generate TAC and $PM_{2.5}$ emissions, but would not expose sensitive receptors to substantial pollutant concentrations in excess of Bay Area Air

District with adherence to General Plan EIR MM AIR-1a and MM AIR-1b (CEQA Checklist Questions 5.III.c and 5.III.e).

- The proposed Project would only result in temporary, intermittent emissions during construction, and operation would not result in other emissions, including odors, that could adversely affect a substantial number of people (CEQA Checklist Question 5.III.f).
- The Project site is located in a seismically active region. During a major earthquake the Project site will experience very strong to violent ground shaking, similar to other areas of the seismically active region. Compliance with CBC regulations and building standards, with site-specific recommendation as provided by a geotechnical engineer, will reduce the effects of strong ground shaking in the event of a likely earthquake scenario to levels considered acceptable by professional engineers, and therefore considered under CEQA to be less than significant (CEQA Checklist Question 5.VII.a)
- Hazardous materials used during Project construction and operation would be typical for the proposed demolition, construction, and operational activities proposed, and would follow all federal, state, and local guidance ensuring the public is not exposed to significant hazards. The proposed Project would not emit hazardous emissions and is not on the Cortese List (CEQA Checklist Questions 5.IX.a through 5.IX.d).
- The Project site is not located within an ALUCP and therefore would not expose people to safety hazards or excessive noise associated with airport operations (CEQA Checklist Question 5.IX.e).
- The proposed Project would not impair or interfere with emergency plans or expose people or structures to wildland fires or wildfires (CEQA Checklist Questions 5.IX.f and 5.IX.g; CEQA Checklist Questions 5.XIX.a through 5.XIX.d).
- The Project site is not located within a 100-Year Flood Hazard Zone (1% Annual Chance Flood Hazard), a 500-Year Flood Hazard Zone (2% Annual Chance Flood Hazard), or a Tsunami Susceptibility location (CEQA Checklist Question 5.X.d).
- The proposed Project would generate noise and vibration during Project construction, but construction noise and vibration would not significantly impact human health. The proposed Project's unmitigated mechanical equipment noise levels may result in a substantial permanent increase in ambient noise levels, but noise impacts would be reduced to a less-than-significant level with adherence to General Plan EIR MM NOI-1 (CEQA Checklist Questions 5.XIII.a through 5.XIII.c).
- The proposed Project would not displace any people or housing (CEQA Checklist Question 5.XIV.b).
- The proposed Project would not increase transportation hazards or result in inadequate emergency access (CEQA Checklist Questions 5.XVI.c and 5.XVI.d).

6 CEQA DETERMINATION / FINDINGS

Based on the information and analysis contained in this Initial Study/CEQA Checklist, the proposed Project is consistent with the development density and land use characteristics established by existing zoning and General Plan policies for which an EIR was certified (i.e., the SSF 2040 General Plan and General Plan EIR).

The proposed Project would be required to comply with all applicable regulatory requirements and/or mitigation measures as cited in the General Plan EIR. With implementation of those regulatory requirements and/or mitigation measures, the preceding Initial Study/CEQA Checklist concludes that the proposed Project would not result in a substantial increase in the severity of any significant impact and would not result in any new significant impacts that were not previously identified in that prior EIR.

In accordance with State CEQA Guidelines Sections 15183 and as set forth in this Initial Study/CEQA Checklist, the proposed Project qualifies for CEQA streamlining provisions because the following findings can be made.

6.1 Consistency with Community Plan or Zoning (State CEQA Guidelines Section 15183)

State CEQA Guidelines Section 15183 provides that, "projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site." These CEQA provisions are intended to streamline the environmental review of certain types of projects, and to reduce the need to prepare redundant environmental studies. These provisions of CEQA apply only to those projects that are consistent with a community plan adopted as part of a General Plan, a zoning action that zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or the General Plan of a local agency. Per State CEQA Guidelines Section 15183 (i)(2), "'consistent' means that the density of the proposed project is the same or less than the standard expressed for the involved parcel in the general plan, community plan or zoning action for which an EIR has been certified, and that the project complies with the density-related standards contained in that plan or zoning. Where the zoning ordinance refers to the general plan or community plan for its density standard, the project shall be consistent with the applicable plan." An EIR must have been certified by the Lead Agency for the community plan, the zoning action, or the General Plan for these provisions to apply.

State CEQA Guidelines Section 15183(b) provides that, in approving a project meeting these requirements, a public agency shall

> . . . limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
>
> (1) Are peculiar to the project or the parcel on which the project would be located,
>
> (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,
>
> (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or

> (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

This Initial Study/CEQA Checklist includes information that demonstrates the proposed Project is consistent with the development density established by existing zoning and the SSF 2040 General Plan. Chapter 4, *Project's Consistency with the General Plan and Zoning*, demonstrates that the proposed Project is consistent with the density and land use standards as established by policies of SSF 2040 General Plan and implementing regulations of the applicable zoning district for the site.

- A Program EIR was prepared and certified by the City for the SSF 2040 General Plan. The proposed Project is consistent with the development assumptions of that prior General Plan EIR.
- This Initial Study/CEQA Checklist examines whether the potential impacts of the proposed Project have already been addressed in the General Plan EIR and concludes that the proposed Project's effects have been thoroughly addressed in that prior EIR, and no Project-specific significant effects that are peculiar to the proposed Project or Project site will occur.
- This Initial Study/CEQA Checklist demonstrates that the proposed Project will not result in significant impacts that were not previously identified in the General Plan EIR as significant Project-level, cumulative, or off-site effects.
- This Initial Study/CEQA Checklist also presents substantial evidence that the proposed Project would not result in new or more severe environmental effects than those previously disclosed in the General Plan EIR, or which may be peculiar to the proposed Project or Project site.
- The proposed Project's potentially significant effects have already been addressed as such in the General Plan EIR and will be substantially mitigated by implementation of General Plan EIR mitigation measures and/or imposition of identified regulatory requirements, and/or the proposed Project's plans as prepared pursuant to those mitigation measures and regulations.

Therefore, the proposed Project would meet the CEQA streamlining criteria of State CEQA Guidelines Section 15183 and no further environmental review is required. Based on an examination of the analysis, findings, and conclusions of the General Plan EIR, all of which are summarized in this Initial Study/CEQA Checklist, the potential environmental impacts associated with the proposed Project have been adequately analyzed and covered in that prior General Plan EIR. No further review or analysis under CEQA is required.

6.2 Reliance on a Prior Program EIR

Pursuant to State CEQA Guidelines Section 15168, "A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either: (1) Geographically, (2) As logical parts in the chain of contemplated actions, (3) In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or (4) As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways." State CEQA Guidelines Section 15168(c) provides that,

> Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared (unless that project is determined to be eligible for a categorical exemption):
>
> (1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a

negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.

(2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

Based on information presented in this Initial Study/CEQA Checklist, the proposed Project would not have effects that were not examined in the General Plan EIR, no subsequent EIR would be required, the City may approve the proposed Project as being within the scope of the project covered by the General Plan EIR, and no additional environmental document is required.

This Initial Study/CEQA Checklist documents the evaluation of the proposed Project and Project site and determines that the environmental effects of the proposed Project are within the scope of the prior General Plan EIR. A finding of reliance on a prior program EIR may be made concurrently, and in addition to a finding for CEQA streamlining pursuant to State CEQA Guidelines Section 15183.

Based on the analysis presented in this Initial Study/CEQA Checklist, the City has determined that none of the conditions described in State CEQA Guidelines Section 15162 calling for the preparation of a subsequent EIR, ND, or MND have occurred. This Initial Study/CEQA Checklist references and relies on the analyses completed in the General Plan EIR and incorporates the conclusions of that prior EIR by reference, as appropriate.

Each of the above findings provides a separate and independent basis for CEQA compliance.

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APPENDIX A

Air Quality and Greenhouse Gas Report

Air Quality and Greenhouse Gas Report for the Westborough Preschool Expansion Project, San Mateo County, California

DECEMBER 2025

PREPARED FOR

The City of South San Francisco

PREPARED BY

SWCA Environmental Consultants

AIR QUALITY AND GREENHOUSE GAS REPORT FOR THE WESTBOROUGH PRESCHOOL EXPANSION PROJECT, SAN MATEO COUNTY, CALIFORNIA

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SWCA Project No. 98470

December 2025

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ACRONYMS AND ABBREVIATIONS

2017 Clean Air Plan	*2017 Clean Air Plan: Spare the Air, Cool the Climate*
$\mu g/m^3$	Micrograms per cubic meter
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ADA	Americans With Disabilities Act
AQMP	Air Quality Management Plan
AQP	Air quality plan
ATCM	Airborne Toxic Control Measures
BAAD	Bay Area Air District
BAAQMD	Bay Area Air Quality Management District
BMP	Best management practices
C_3H_4O	Acrolein
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CalEPA	California Environmental Protection Agency
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CAT	California Action Team
CCAA	California Clean Air Act
CCAP	Community Climate Action Plan
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CALGreen Code	California Green Building Standards Code
CH_4	Methane
City	The City of South San Francisco
CO	Carbon monoxide

CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
County	County of San Mateo
Diesel PM	Diesel particulate matter
EIR	Environmental Impact Report
Energy Code	Building Energy Efficiency Standards (24 CCR 6)
EO	Executive Order
EPA	U.S. Environmental Protection Agency
GHG	Greenhouse gas
H_2S	Hydrogen sulfide
IQ	Intelligence quotient
LCFS	Low Carbon Fuel Standard
Mandatory Reporting Rule	Mandatory Reporting of Greenhouse Gas Emissions
MEIR	Maximally Exposed Individual Resident
$MTCO_2e$	Metric tons CO_2 equivalent
N_2O	Nitrous oxide
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	Nitrogen dioxide
NO_x	Nitrogen oxides
NOA	Naturally occurring asbestos
O_3	Ozone
OEHHA	California Office of Environmental Health Hazard Assessment
OPR	Governor's Office of Land Use and Climate Innovation
OSHA	Occupational Safety and Health Administration
$PM_{2.5}$	Particulate matter less than 2.5 microns in diameter
PM_{10}	Particulate matter less than 10 microns in diameter

ppb	Parts per billion
ppm	Parts per million
project	Westborough Preschool Expansion Project
ROG	Reactive organic gases
SAFE	Safer Affordable Fuel-Efficient Vehicles Rule
SB	Senate Bill
SFBAAB	San Francisco Bay Area Air Basin
SO_2	Sulfur dioxide
SO_X	Sulfur oxides
SCS	Sustainable Communities Strategy
SWCV	Solid waste collection vehicle
TAC	Toxic Air Contaminant
TRU	Transport Refrigeration Units
TSCA	Toxic Substances Control Act
VMT	Vehicle miles traveled
VOC	Volatile organic compounds
ZEV	Zero Emission Vehicle

1 INTRODUCTION

SWCA Environmental Consultants has prepared this air quality/greenhouse gas (GHG) report at the request of the City of South San Francisco (City) in support of the Westborough Preschool Expansion Project (project) in South San Francisco, San Mateo County, California. This report describes the methodologies used to quantify project air pollutant and GHG emissions and to evaluate the air quality and GHG impacts associated with the construction and operation of the project. This report also addresses the consistency of the project with applicable state and local regulatory policies pertaining to air quality and GHGs, and analyzes whether the project would cause an exceedance of an ambient air quality standard or Bay Area Air District (BAAD; formerly the Bay Area Air Quality Management District [BAAQMD]) significance thresholds.

2 PROJECT DESCRIPTION

2.1 Location

The 0.48-acre (approximately 21,125-square-foot) project site intersects Assessor's Parcel Numbers 091-150-080 and -090, and is located at 2350 Galway Drive in South San Francisco, San Mateo County, California. The project is located in the Westborough Subarea (Figure 1), which is west of Highway 280 (City of South San Francisco 2022).

Westborough Park is bounded by Westborough Boulevard and single-family homes to the south, Westborough Middle School to the west, single-family homes to the north, and Galway Drive and single-family homes to the east. The project site is bounded by Galway Drive and residences to the east, Westborough Park facilities (tennis court, picnic shelter, picnic areas, lawn, and parking lot) to the south and west and the Westborough Fire Station and single-family homes to the north (Figure 2).

2.2 Project Components

The project would include demolition of existing structures and trees on-site, as well as the construction of a new preschool facility, public restroom and other ancillary facilities. The new preschool facilities would include a new building with five indoor classrooms, one covered outdoor classroom, and an administrative office space.

The project would include the following primary components:

- Construction of an outdoor play area including trike path, climbing structures, and natural play areas
- Construction of an Americans With Disabilities Act (ADA)-compliant ramp to access existing tennis courts
- Alterations to the existing parking lot
- Realignment and construction of a new section of maintenance road to connect with existing park maintenance roads
- New curb cut, cattle gate, and realignment of maintenance road off Westborough Boulevard
- Construction of new retaining walls on the north and west sides of the new preschool building
- Construction of new 6-foot fencing and retaining wall

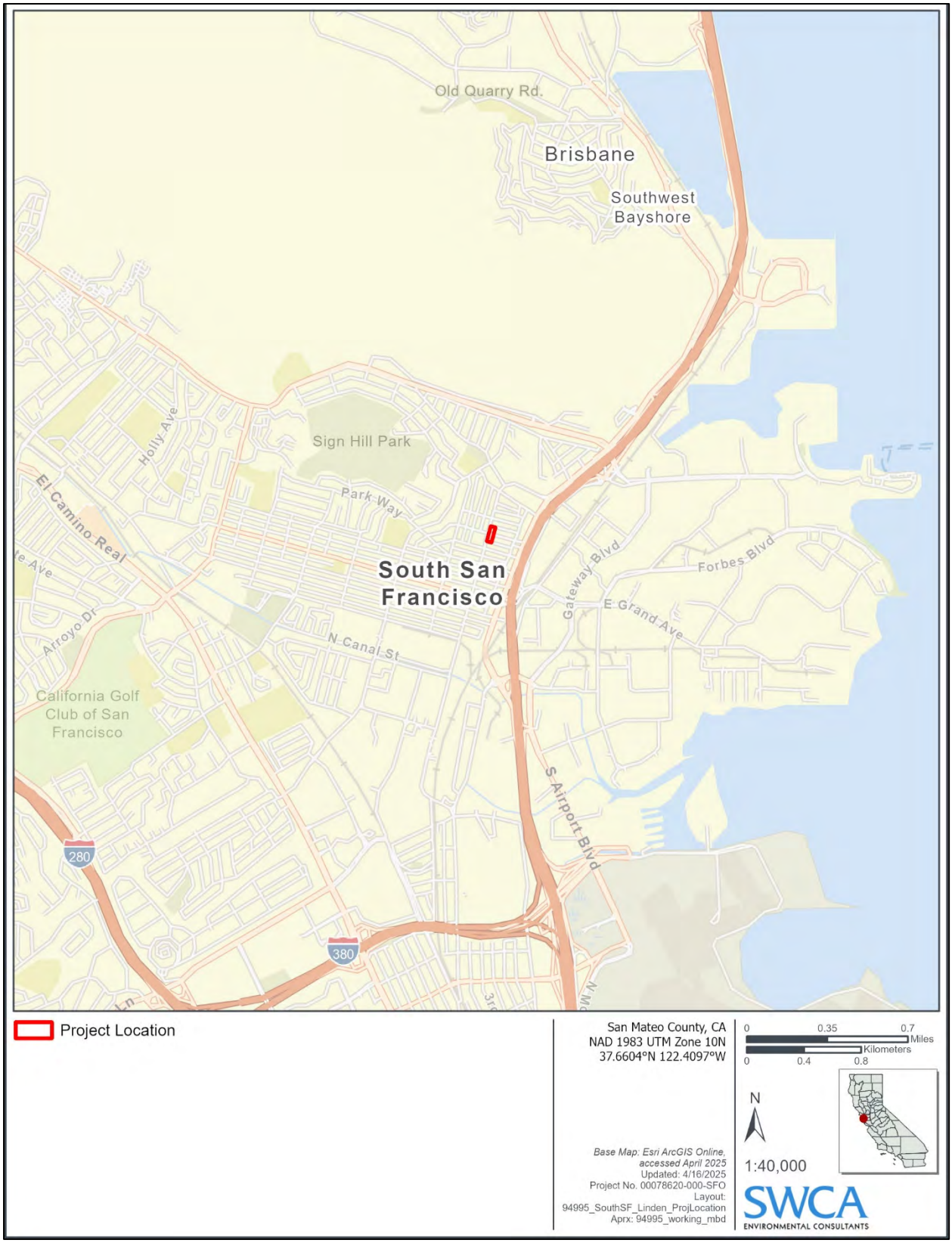

Figure 1. Vicinity map.

Figure 2. Project boundaries.

- Installation of new landscaping and irrigation facilities, including 16 trees and native and low-water plants
- Installation of new stormwater bioretention and treatment facilities
- Installation of new fire hydrant and transformer to serve the preschool

The existing maintenance building at the northwest corner of Westborough Park will be demolished to make way for the new preschool facilities. The additional classrooms would increase student capacity to 100 children and require up to 15 staff on-site. Buildings would be one story, with a maximum height of 17 feet 8.5 inches. The proposed parking plan maintains a total of 59 stalls: pickup/dropoff stalls would increase by three and would be moved to the north end of the parking lot. Handicapped stalls would increase by one, three regular stalls would be converted to compact stalls, and regular stalls would decrease from 56 to 50. The community center would continue to function as a preschool until construction is complete; preschool operations would move to the new preschool facilities immediately following completion.

Construction emissions associated with the project, including emissions associated with the operation of off-road equipment, haul-truck trips, on-road worker vehicle trips, vehicle travel on paved and unpaved surfaces, and fugitive dust from material handling activities, were calculated using CalEEMod version 2022.1.1.33 (California Air Pollution Control Officers Association [CAPCOA] 2022). Construction of the project, from mobilization to the site to final completion, is expected to begin in February 2026 and would last for approximately 12 months. The project would be constructed in six phases: 1) demolition 2) site preparation; 3) grading; 4) building construction (three stages); 5) paving; and 6) architectural coating. All construction activities, including staging of construction equipment, would be entirely within the project site. Typical construction equipment would be used during all phases of project construction and would be stored within the staging area, potentially including bulldozers, excavators, backhoes, compactors, scrapers, graders, air compressors, all-terrain passenger vehicles, backhoes, cranes, a drill rig, tractor-trailers, flat-bed trucks, telehandlers, pickup trucks, pile drivers, trenchers, portable generators, and water trucks. Section 5.2.1 of Appendix A details the specific equipment that would operate during each phase.

The project is within a 0.48-acre parcel, with disturbance occurring over approximately 20,500 square feet. Construction will take place from February 1, 2026, until March 1, 2027. Two CalEEMod land use categories were used to represent the project: Day Care Center (0.48 acre) and Parking Lot (0.15 acre). The demolition phase assumes the export of material from a 700-square-foot building. No import or export from cut and fill activities is anticipated. This analysis includes quantification of construction and operation off-road equipment, fugitive dust, and on road mobile sources, as well as the operation and maintenance emissions. The construction emissions were mitigated in the CalEEMod model to comply with any BAAD standard control measures identified in Section 8.

Once construction is complete, preschool operations will resume in the new preschool facilities with the increased preschool capacity. Criteria pollutant and GHG emissions from the operation and maintenance of the preschool facility were also estimated using CalEEMod version 2022.1.1.33. Year 2028 was assumed as the first full year of operations after completion of construction. The project site would be staffed during operation. Details of the modeling assumptions and emission factors are provided in Appendix A.

3 ENVIRONMENTAL SETTING AND OVERVIEW OF AIR POLLUTION AND POTENTIAL HEALTH EFFECTS

The proposed project is located within the San Francisco Bay Area Air Basin (SFBAAB), which consists of the entirety of Alameda, Contra Costa, Marin, Napa, San Francisco, San Mateo, and Santa Clara Counties; the western portion of Solano County; and the southern portion of Sonoma County. The air basin is characterized by complex terrain consisting of coastal mountain ranges, inland valleys, and bays. The regional climate of the air basin is characterized by mildly dry summers and moderately wet winters. The region experiences moderate humidity with wind patterns consisting of mild onshore breezes during the day. The location of a strong subtropical high-pressure cell in the Pacific Ocean induces foggy mornings and moderate temperatures during the summer, as well as occasional rainstorms during the winter.

The sections that follow discuss the air pollutants most relevant to air quality planning and regulation in the Bay Area, as well as GHGs. Construction and operation of the proposed project would be subject to applicable BAAD (formerly BAAQMD) rules and requirements. The BAAD has developed California Environmental Quality Act (CEQA) thresholds and guidelines to assist local jurisdictions and lead agencies in complying with the requirements of CEQA regarding potentially adverse impacts to air quality. The screening criteria established by the *Bay Area Air Quality Management District California Environmental Quality Act Air Quality Guidelines*, dated April 2022 (BAAD 2025a), have been relied upon to make the significance determinations in this report.

3.1 Air Pollutants

The air pollutants for which national and state standards have been promulgated and that are most relevant to air quality planning and regulation in the Bay Area include ozone (O_3); nitrogen dioxide (NO_2); carbon monoxide (CO); particulate matter, including dust, 10 microns or less in diameter (PM_{10}) and 2.5 micrometers or less in diameter ($PM_{2.5}$); sulfur dioxide (SO_2); lead; sulfates; and hydrogen sulfide (H_2S). These pollutants, as well as vinyl chloride, volatile organic compounds (VOCs), and toxic air contaminants (TACs), are briefly described below. The national and state criteria pollutants and the applicable ambient air quality standards are listed in Table 1.

Table 1. State and Federal Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards	National Standards	
			Primary	Secondary
Ozone (O_3)	1 hour	0.09 ppm (180 µg/m³)	–	Same as Primary
	8 hour	0.070 ppm (137 µg/m³)	0.070 ppm (137µg/m³)	
Respirable particulate matter (PM_{10})	24 hour	50 µg/m³	150 µg/m³	Same as Primary
	Annual mean	20 µg/m³	–	
Fine particulate matter ($PM_{2.5}$)	24 hour	--	35 µg/m³	Same as Primary
	Annual mean	12 µg/m³	9.0 µg/m³	15 µg/m³
Carbon monoxide (CO)	1 hour	20 ppm (23 µg/m³)	35 ppm (40 mg/m³)	–
	8 hour	9.0 ppm (10 mg/m³)	9 ppm (10 mg/m³)	–
Nitrogen dioxide (NO_2)	1 hour	0.18 ppm (339 µg/m³)	100 ppb (188 µg/m³)	–
	Annual mean	0.030 ppm (57 µg/m³)	0.053 ppm (100 µg/m³)	Same as Primary

Pollutant	Averaging Time	California Standards	National Standards	
			Primary	Secondary
Sulfur dioxide (SO_2)	1 hour	0.25 ppm (655 µg/m³)	75 ppb (196 µg/m³)	–
	3 hour	–	–	0.5 ppm (1,300 µg/m³)
	24 hour	0.04 ppm (105 µg/m³)	0.14 ppm	–
	Annual mean	–	0.010 ppm	–
Lead	30-day average	1.5 µg/m³	–	–
	Calendar quarter	–	1.5 µg/m³	Same as Primary
	Rolling 3-month average	–	0.15 µg/m³	Same as Primary
Visibility-reducing particles	8 hour	10-mile visibility standard, extinction of 0.23 per kilometer	No National Standards	
Sulfates	24 hour	25 µg/m³		
Hydrogen sulfide (H_2S)	1 hour	0.03 ppm (42 µg/m³)		
Vinyl chloride	24 hour	0.01 ppm (265 µg/m³)		

Source: California Air Resources Board (CARB) (2024); U.S. Environmental Protection Agency (EPA) (2025a).
Notes: ppm = parts per million; ppb = parts per billion; µg/m³ = micrograms per cubic meter; – = no standard.

3.1.1 Ozone

Ozone (O_3) is a strong-smelling, pale blue, reactive, toxic chemical gas consisting of three oxygen atoms. It is a secondary pollutant formed in the atmosphere by a photochemical process involving the sun's energy and O_3 precursors. These precursors are mainly nitrogen oxides (NO_X) and VOCs. The maximum effects of precursor emissions on O_3 concentrations usually occur several hours after they are emitted and many miles from the source. Meteorology and terrain play major roles in O_3 formation, and ideal conditions occur during summer and early autumn on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. O_3 exists in the upper atmosphere O_3 layer (stratospheric ozone) and at the Earth's surface in the troposphere (ozone).

The O_3 that the U.S. Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) regulates as a criteria air pollutant is produced close to the ground level, where people live, exercise, and breathe. Ground-level O_3 is a harmful air pollutant that causes numerous adverse health effects and is thus considered "bad" O_3. Stratospheric, or "good," O_3 occurs naturally in the upper atmosphere, where it reduces the amount of ultraviolet light (i.e., solar radiation) entering the Earth's atmosphere. Without the protection of the beneficial stratospheric O_3 layer, plant and animal life would be seriously harmed. O_3 in the troposphere causes numerous adverse health effects; short-term exposures (lasting for a few hours) can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes (EPA 2024). These health problems are particularly acute in sensitive receptors such as the sick, the elderly, and young children.

3.1.2 Nitrogen Dioxide

Nitrogen dioxide (NO_2) is a brownish, highly reactive gas that is present in all urban atmospheres. The major mechanism for the formation of NO_2 in the atmosphere is the oxidation of the primary air pollutant nitric oxide, which is a colorless, odorless gas. NO_X plays a major role, together with VOCs, in the atmospheric reactions that produce O_3. NO_X is formed from fuel combustion under high temperature or

pressure. In addition, NO_X is an important precursor to acid rain and may affect both terrestrial and aquatic ecosystems. The two major emissions sources are transportation and stationary fuel combustion sources such as electric utility and industrial boilers. NO_2 can irritate the lungs, cause bronchitis and pneumonia, and lower resistance to respiratory infections (EPA 2022).

3.1.3 Carbon Monoxide

Carbon monoxide (CO) is a colorless, odorless gas formed by the incomplete combustion of hydrocarbon, or fossil fuels that is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, such as the project location, automobile exhaust accounts for the majority of CO emissions. CO is a nonreactive air pollutant that dissipates relatively quickly; therefore, ambient CO concentrations generally follow the spatial and temporal distributions of vehicular traffic. CO concentrations are influenced by local meteorological conditions—primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, which is a typical situation at dusk in urban areas from November to February. The highest levels of CO typically occur during the colder months of the year, when inversion conditions are more frequent. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions (EPA 2022).

3.1.4 Particulate Matter

Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. $PM_{2.5}$ and PM_{10} represent fractions of particulate matter.

Coarse particulate matter (PM_{10}) is about 1/7 the thickness of a human hair, and major sources include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; smoke from wildfires and brush and waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

Fine particulate matter ($PM_{2.5}$) is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g., from motor vehicles and power generation and industrial facilities), residential fireplaces, and woodstoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur oxides (SO_X), NO_X, and VOCs.

$PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances such as lead, sulfates, and nitrates can cause lung damage directly or be absorbed into the bloodstream, causing damage elsewhere in the body. Additionally, these substances can transport adsorbed gases such as chlorides or ammonium into the lungs, also causing injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissue. Suspended particulates also damage and discolor surfaces on which they settle and produce haze and reduce regional visibility. People with influenza, people with chronic respiratory and cardiovascular diseases, and the elderly may suffer worsening illness and premature death as a result of breathing particulate matter. People with bronchitis can expect aggravated symptoms from breathing in particulate

matter. Children may experience a decline in lung function due to breathing in $PM_{2.5}$ and PM_{10} (EPA 2022).

3.1.5 Sulfur Dioxide

Sulfur dioxide is a colorless, pungent gas formed primarily from incomplete combustion of sulfur-containing fossil fuels. The main sources of SO_2 are coal and oil used in power plants and industries; as such, the highest levels of SO_2 are generally found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs and can cause acute respiratory symptoms and diminished ventilator function in children. When combined with particulate matter, SO_2 can injure lung tissue and reduce visibility and the level of sunlight. SO_2 can also yellow plant leaves and erode iron and steel (EPA 2022).

Sulfur dioxide is regulated but is not considered an issue in the project area; the proposed project would not emit substantial quantities of this pollutant, so it is not discussed further in this report.

3.1.6 Lead

Lead in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturing of batteries, paints, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phaseout of leaded gasoline reduced the overall inventory of airborne lead by nearly 95%. With the phaseout of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities are becoming lead-emissions sources of greater concern. Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient (IQ) performance, psychomotor performance, reaction time, and growth. Children are highly susceptible to the effects of lead (EPA 2022).

Lead is regulated but is not considered an issue in the project area; the proposed project would not emit substantial quantities of this pollutant, so it is not discussed further in this report.

3.1.7 Sulfates, Vinyl Chloride, and Hydrogen Sulfide

Sulfates are the fully oxidized form of sulfur, which typically occur in combination with metals or hydrogen ions. Sulfates are produced from reactions of SO_2 in the atmosphere. Sulfates can result in respiratory impairment, as well as reduced visibility.

Vinyl chloride is a colorless gas with a mild, sweet odor, which has been detected near landfills, sewage plants, and hazardous waste sites, due to the microbial breakdown of chlorinated solvents. Short-term exposure to high levels of vinyl chloride in air can cause nervous system effects, such as dizziness, drowsiness, and headaches. Long-term exposure through inhalation can cause liver damage, including liver cancer.

Hydrogen sulfide (H_2S) is a colorless and flammable gas that has a characteristic odor of rotten eggs. Sources of H_2S include geothermal power plants, petroleum refineries, sewers, and sewage treatment plants. Exposure to H_2S can result in nuisance odors, as well as headaches and breathing difficulties at higher concentrations.

Sulfates, vinyl chloride, and H_2S are regulated but are not considered an issue in the project area; the proposed project would not emit substantial quantities of these pollutants, so they are not discussed further in this report.

3.1.8 Volatile Organic Compounds

VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids. Some VOCs are also classified by the State as TACs. While there are no specific VOC ambient air quality standards, VOC is a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as O_3, NO_2, and certain fine particles are formed. They are, thus, regulated as "precursors" to the formation of those criteria pollutants.

3.1.9 Toxic Air Contaminants

TACs refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional.

TACs are identified by federal and state agencies, including the California Office of Environmental Health Hazard Assessment (OEHHA), based on a review of available scientific evidence. In the state of California, TACs are identified through a two-step process that was established in 1983 under the Toxic Air Contaminant Identification and Control Act. This two-step process of risk identification and risk management and reduction was designed to protect residents from the health effects of toxic substances in the air. In addition, the California Air Toxics "Hot Spots" Information and Assessment Act, Assembly Bill (AB) 2588, was enacted by the state legislature in 1987 to address public concern over the release of TACs into the atmosphere. The law requires facilities emitting toxic substances to provide local air pollution control districts with information that will allow an assessment of the air toxics problem, identification of air toxics emissions sources, location of resulting hot spots, notification of the public exposed to significant risk, and development of effective strategies to reduce potential risks to the public over 5 years.

The federal TACs are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health, although there are no ambient standards established for TACs. Many pollutants are identified as TACs because of their potential to increase the risk of developing cancer or other acute (short-term) or chronic (long-term) health problems. For TACs that are known or suspected carcinogens, the CARB has consistently found that there are no levels or thresholds below which exposure is risk free. Individual TACs vary greatly in the risks they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another. For certain TACs, a unit risk factor can be developed to evaluate cancer risk. For acute and chronic health effects, a similar factor, called a Hazard Index, is used to evaluate risk. TACs are identified and their toxicity is studied by the OEHHA.

Examples of TAC sources include industrial processes, dry cleaners, gasoline stations, paint and solvent operations, and fossil fuel combustion sources. The TAC that is relevant to the implementation of the project include diesel particulate matter (diesel PM). Diesel PM was identified as a TAC by the CARB in August 1998 (CARB 1998). Diesel PM is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute approximately 40% of the statewide total, with an additional 57% attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and transport refrigeration units. Stationary sources, contributing about 3% of emissions, include shipyards, warehouses, heavy-equipment repair yards, and oil and gas production operations.

Emissions from these sources are from diesel-fueled internal combustion engines. Stationary sources that report diesel PM emissions also include heavy construction, manufacturers of asphalt paving materials and blocks, and diesel-fueled electrical generation facilities.

Exposure to diesel PM can have immediate health effects. Diesel PM can have a range of health effects including irritation of eyes, throat, and lungs, causing headaches, lightheadedness, and nausea. Exposure to diesel PM also causes inflammation in the lungs, which may aggravate chronic respiratory symptoms and increase the frequency or intensity of asthma attacks. Children, the elderly, and people with emphysema, asthma, and chronic heart and lung disease are especially sensitive to fine-particle pollution. In California, diesel PM has been identified as a carcinogen.

While not a TAC, fine particulate matter ($PM_{2.5}$) has been identified by the BAAQMD as a pollutant with potential non-cancer health effects that should be included when evaluating potential community health impacts under the CEQA. Diesel exhaust is the predominant TAC in air in urban areas and is estimated to contribute more than 85% of a 2006 inventory of Bay Area cancer risk from TACs (BAAQMD 2014). According to CARB, diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB, and are listed as carcinogens either under the State of California's Proposition 65 or under the federal Hazardous Air Pollutants programs.

CARB has adopted and implemented a number of regulations to reduce emissions of diesel PM from stationary and mobile sources. Several of these regulatory programs affect medium- and heavy-duty diesel trucks that represent the bulk of diesel PM emissions from California highways. These regulations include the solid waste collection vehicle (SWCV) rule, in-use public and utility fleets, and the heavy-duty diesel truck and bus regulations. In 2008, CARB approved a new regulation to reduce emissions of diesel PM and NO_x from existing on-road heavy-duty diesel-fueled vehicles, including those used at construction sites. The regulation requires affected vehicles to meet specific performance requirements between 2014 and 2023, with all affected diesel vehicles required to have 2010 model year engines or equivalent by 2023. Therefore, as of January 1, 2023, all trucks and buses are 2010 or newer model year engines.

Naturally occurring asbestos (NOA) areas are identified based on the type of rock found in the area. Asbestos-containing rocks found in California are ultramafic rocks, including serpentine rocks. Asbestos has been designated a TAC by the CARB and is a known carcinogen. When this material is disturbed in connection with construction, grading, quarrying, or surface mining operations, asbestos-containing dust can be generated. Exposure to asbestos can result in adverse health effects such as lung cancer, mesothelioma (cancer of the linings of the lungs and abdomen), and asbestosis (scarring of lung tissues that results in constricted breathing) (Van Gosen and Clinkenbeard 2011).

NOA is prevalent in at least 44 of California's 58 counties. Asbestos is the name for a group of naturally occurring silicate minerals. Asbestos may be found in serpentine, other ultramafic and volcanic rock. When rock containing NOA is broken or crushed, asbestos may become released and become airborne, causing a potential health hazard. BAAD Regulation 11, Rule 2, in addition to the California Airborne Toxic Control Measures (ATCMs) 17 California Code of Regulations (CCR) Section 93105 and 17 CCR Section 93106, controls emissions of asbestos to the atmosphere during demolition, renovation, milling, and manufacturing and establishes appropriate waste disposal procedures. The project site is not located in a geologic setting with a potential to contain asbestos; therefore, NOA will not be an issue for this project (CARB 2000a).

3.2 Greenhouse Gases

Although there are National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS) for the criteria air pollutants discussed above, there are currently no NAAQS or specific ambient air quality standards for GHGs under the Clean Air Act (CAA). GHGs—including carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O)—trap heat in the atmosphere and occur both naturally and from human activities such as fossil fuel combustion. Carbon is the most abundant GHG. Other GHGs are less abundant but have higher global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as carbon dioxide equivalent (CO_2e). While GHGs are not considered toxic or hazardous at typical ambient concentrations, they are subject to reporting and permitting thresholds under applicable federal regulations.

3.3 Existing Air Quality Conditions in the Project Area

3.3.1 Regional Attainment Status

Depending on whether the applicable ambient air quality standards are met or exceeded, the SFBAAB is classified on a federal and state level as being in "attainment" or "nonattainment." The EPA and CARB determine the air quality attainment status of designated areas by comparing ambient air quality measurements from state and local ambient air monitoring stations with the NAAQS and CAAQS. These designations are determined on a pollutant-by-pollutant basis. Consistent with federal requirements, an unclassifiable/ unclassified designation is treated as an attainment designation. The SFBAAB and San Mateo County are currently designated as nonattainment for both California and national O_3 and $PM_{2.5}$ standards. For all other criteria pollutants, the SFBAAB and San Mateo County are designated as attainment or unclassified (BAAD 2025b; EPA 2025b).

3.3.2 Sensitive Uses

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardiorespiratory diseases), are considered more sensitive to air pollution than others. A sensitive receptor is a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. The following are land uses where sensitive receptors are typically located:

- Schools, playgrounds and childcare centers
- Long-term health care facilities
- Rehabilitation centers
- Convalescent centers
- Hospitals
- Retirement homes
- Residences

Existing sensitive receptors near the project site include single-family residences adjacent to the north, east, and south of the project site. The Westborough Middle School is located about 1,145 feet to the west of the project site. In addition, sensitive receptors on the project site include the classrooms where children congregate throughout the school day. All other air quality sensitive receptors are located at greater distances from the project and would be less impacted by project emissions. Implementation of the

proposed project would not result in the long-term operation of any emission sources that would adversely affect nearby sensitive receptors. Short-term (12 months) construction activities could result in temporary increases in pollutant concentrations.

4 REGULATORY SETTING

4.1 Federal

4.1.1 Federal Clean Air Act

The federal CAA, which was passed in 1970 and last amended in 1990, forms the basis for the national air pollution control effort. The CAA delegates primary responsibility for clean air to the EPA. The EPA develops rules and regulations to preserve and improve air quality and delegates specific responsibilities to state and local agencies. Under the act, the EPA has established the NAAQS for six criteria air pollutants that are pervasive in urban environments and for which state and national health-based ambient air quality standards have been established. Ozone (O_3), CO, NO_2, SO_2, lead, and particulate matter (PM_{10} and $PM_{2.5}$) are the six criteria air pollutants. Ozone is a secondary pollutant; NO_X and VOCs are of particular interest as they are precursors to O_3 formation. The NAAQS are divided into primary and secondary standards; the primary standards are set to protect human health within an adequate margin of safety, and the secondary standards are set to protect environmental values, such as plant and animal life.

The CAA requires the EPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The act also mandates that the State submit and implement a State Implementation Plan for areas not meeting the NAAQS. These plans must include pollution control measures that demonstrate how the standards will be met.

4.1.2 Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. TSCA became law on October 11, 1976, and became effective on January 1, 1977. The TSCA authorized the EPA to secure information on all new and existing chemical substances, as well as to control any of the substances that were determined to cause unreasonable risk to public health or the environment. Congress later added additional titles to the Act, with this original part designated at Title I – Control of Hazardous Substances. TSCA regulatory authority and program implementation rests predominantly with the federal government (i.e., the EPA). However, the EPA can authorize states to operate their own EPA-authorized programs for some portions of the statute. TSCA Title IV allows states the flexibility to develop accreditation and certification programs and work practice standards for lead-related inspection, risk assessment, renovation, and abatement that are at least as protective as existing federal standards.

4.1.3 National Emission Standards for Hazardous Air Pollutants (Asbestos)

The EPA's air toxics regulation for asbestos is intended to minimize the release of asbestos fibers during activities involving the handling of asbestos. Asbestos was one of the first hazardous air pollutants regulated under the air toxics program as there are major health effects associated with asbestos exposure (lung cancer, mesothelioma, and asbestosis). On March 31, 1971, the EPA identified asbestos as a hazardous pollutant, and on April 6, 1973, EPA promulgated the Asbestos National Emission Standards

for Hazardous Air Pollutants (NESHAP), currently found in 40 Code of Federal Regulations 61(M). The Asbestos NESHAP has been amended several times, most comprehensively in November 1990. In 1995 the rule was amended to correct cross-reference citations to Occupational Safety and Health Administration (OSHA), U.S. Department of Transportation, and other EPA rules governing asbestos. Air toxics regulations under the CAA have guidance on reducing asbestos in renovation and demolition of buildings; institutional, commercial, and industrial building; large-scale residential demolition; exceptions to the asbestos removal requirements; asbestos control methods; waste disposal and transportation; and milling, manufacturing, and fabrication.

4.2 State

4.2.1 California Clean Air Act

The California Clean Air Act (CCAA) was adopted by the CARB in 1988. The CCAA requires that all air districts in the state endeavor to achieve and maintain CAAQS for O_3, CO, SO_2, and NO_2 by the earliest practical date. The CCAA specifies that districts focus particular attention on reducing the emissions from transportation and area-wide emission sources, and the act provides districts with authority to regulate indirect sources. The CARB and local air districts are responsible for achieving CAAQS, which are to be achieved through district-level air quality management plans (AQMPs) that would be incorporated into the State Implementation Plan. In California, the EPA has delegated authority to prepare State Implementation Plans to CARB, which in turn, has delegated that authority to individual air districts. Each district plan is required to either 1) achieve a 5% annual reduction, averaged over consecutive 3-year periods, in district-wide emissions of each nonattainment pollutant or its precursors, or 2) to provide for implementation of all feasible measures to reduce emissions. Any planning effort for air quality attainment would thus need to consider both state and federal planning requirements.

The State of California began to set its ambient air quality standards (i.e., CAAQS) in 1969, under the mandate of the Mulford-Carrell Air Resources Act. The CCAA requires all air districts of the state to achieve and maintain the CAAQS by the earliest practical date. Table 1 (above) shows the CAAQS currently in effect for each of the criteria pollutants, as well as the other pollutants recognized by the State. As shown in Table 1, the CAAQS are generally more stringent than the corresponding federal standards and incorporate additional standards for sulfates, H_2S, vinyl chloride, and visibility-reducing particles.

California has also adopted a host of other regulations that reduce criteria pollutant emissions, including:

- CCR Title 20 – Appliance Energy Efficiency Standards: Title 20 of the CCR encompasses the Appliance Energy Efficiency Standards, which are designed to reduce energy consumption and promote energy efficiency across a wide range of appliances and equipment used in residential and commercial settings. These standards set minimum efficiency requirements for various appliances, including refrigerators, air conditioners, water heaters, and lighting products. The regulations aim to lower energy demand, reduce GHG emissions, and provide cost savings to consumers through decreased energy bills. Compliance with these standards is mandatory for manufacturers and retailers, ensuring that all products sold in California meet the specified energy efficiency criteria. The overarching goal is to support California's broader environmental and energy conservation objectives.
- CCR Title 24, Part 6 – Building Energy Efficiency Standards (Energy Code): Energy consumption by new buildings in California is regulated by the Building Energy Efficiency Standards, in Part 6 of Title 24 of the CCR, known as the Energy Code. The CEC first adopted the Building Energy Efficiency Standards for Residential and Non-residential Buildings in 1978

in response to a legislative mandate to reduce energy consumption in the State. The Energy Code is updated every 3 years, with the most recent update consisting of the 2022 Energy Code that became effective January 1, 2023. Mid-cycle supplements to the 2022 Code will become effective on July 1, 2024. The efficiency standards apply to both new construction and rehabilitation of both residential and nonresidential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those provided in the Energy Code and the California Green Building Standards Code.

- CCR Title 24, Part 11 – Green Building Standards Code: In 2010, the California Building Standards Commission adopted Part 11 of the Title 24 Building Energy Efficiency Standards, referred to as the California Green Building Standards Code (CALGreen Code). The CALGreen Code took effect on January 1, 2011. The CALGreen Code is updated on a regular basis, with the most recent update consisting of the 2022 CALGreen Code standards that became effective January 1, 2023. The CALGreen Code established mandatory measures for residential and nonresidential building construction and encouraged sustainable construction practices in the following five categories: 1) planning and design, 2) energy efficiency, 3) water efficiency and conservation, 4) material conservation and resource efficiency, and 5) indoor environmental quality. Although the CALGreen Code was adopted as part of the State's efforts to reduce GHG emissions, the CALGreen Code standards have co-benefits of reducing energy consumption from residential and nonresidential buildings subject to the standard.

4.2.2 California Code of Regulations

The CCR is the official compilation and publication of regulations adopted, amended, or repealed by the state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in Title 13 of the CCR states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to 5 minutes at any location. In addition, Section 93115 in Title 17 of the CCR states that operation of any stationary, diesel-fueled, compression-ignition engine shall meet specified fuel and fuel additive requirements and emission standards.

4.2.3 Toxic Air Contaminants Regulations

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act of 1983 (AB 1807, also known as the Tanner Air Toxics Act) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (AB 2588 – Connelly). In the early 1980s, the CARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Tanner Air Toxics Act (AB 1807) created California's program to reduce exposure to air toxics. The Air Toxics "Hot Spots" Information and Assessment Act (AB 2588) supplements the AB 1807 program by requiring a statewide air toxics inventory, notification of people exposed to a significant health risk, and facility plans to reduce these risks (CARB 2011).

In August 1998, CARB identified diesel PM emissions from diesel-fueled engines as a TAC. In September 2000, CARB approved a comprehensive diesel risk reduction plan to reduce emissions from both new and existing diesel-fueled engines and vehicles (CARB 2000b). The goal of the plan is to reduce diesel PM_{10} (inhalable particulate matter) emissions and the associated health risk by 75% in 2010, and by 85% by 2020. The plan identified 14 measures that target new and existing on-road vehicles (e.g., heavy-duty trucks and buses, etc.), off-road equipment (e.g., graders, tractors, forklifts, sweepers, and boats), portable equipment (e.g., pumps, etc.), and stationary engines (e.g., stand-by power generators, etc.).

During the control measure phase, specific statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles were evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. The project would be required to comply with applicable diesel control measures.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High priority facilities are required to perform a health risk assessment, and if specific thresholds are exceeded, the facilities are required to communicate the results to the public through notices and public meetings.

CARB has promulgated the following specific rules to limit TAC emissions:

- 13 CCR Chapter 10, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.
- 13 CCR Chapter 10, Section 2480, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools.
- 13 CCR Section 2477 and Article 8, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

4.2.4 Executive Order S-3-05, Executive Order B-30-15, and Executive Order B-55-18

In 2005, the governor issued Executive Order (EO) S-3-05, establishing statewide GHG emissions reduction targets, as well as a process to ensure the targets are met. The order directed the Secretary of the California Environmental Protection Agency (CalEPA) to report every 2 years on the State's progress toward meeting the governor's GHG emission reduction targets. The statewide GHG targets established by EO S-3-05 are as follows:

- By 2010, reduce to 2000 emission levels
- By 2020, reduce to 1990 emission levels
- By 2050, reduce to 80% below 1990 levels

EO B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions 40% below their 1990 levels by 2030. Reducing GHG emissions by 40% below 1990 levels in 2030 and by 80% below 1990 levels by 2050 (consistent with EO S-3-05) aligns with scientifically established levels needed in the United States to limit global warming below 2 degrees Celsius (35.6°F).

The state legislature adopted equivalent 2020 and 2030 statewide targets in the California Global Warming Solutions Act of 2006 (also known as AB 32) and Senate Bill (SB) 32, respectively, both of which are discussed below. However, the legislature has not yet adopted a target for the 2050 horizon year. As a result of EO S-3-05, the California Action Team (CAT), led by the Secretary of CalEPA, was formed. The CAT is made of representatives from a number of state agencies and was formed to implement global warming emission reduction programs and to report on the progress made toward meeting statewide targets established under the EO. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the EO.

The CAT stated that "smart" land use is an umbrella term for strategies that integrate transportation and land use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. "Intelligent transportation systems" is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.

EO B-55-18, issued by Governor Brown in September 2018, establishes a new statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Based on this EO, CARB would work with relevant state agencies to develop a framework for implementation and accounting that tracks progress toward this goal, as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

4.2.5 Assembly Bill 32 – California Global Warming Solution Act

The California Global Warming Solutions Act of 2006 (AB 32) commits the State to achieve the following:

- By 2010, reduce to 2000 GHG emission levels
- By 2020, reduce to 1990 levels

To achieve these goals, which are consistent with the California CAT GHG targets for 2010 and 2020, AB 32 mandates that the CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources consistent with the CAT strategies, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. To achieve the reductions, AB 32 requires CARB to adopt rules and regulations in an open, public process that achieves the maximum technologically feasible and cost-effective GHG reductions.

SB 32, signed September 8, 2016, updates AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40% below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

4.2.6 Climate Change Scoping Plan

In 2008, CARB approved a Climate Change Scoping Plan, as required by AB 32. Subsequently, CARB approved updates of the Climate Change Scoping Plan in 2014 (First Update) and 2017 (2017 Update), with the 2017 Update considering SB 32 (adopted in 2016) in addition to AB 32 (CARB 2014, 2017). The First Update highlights California's progress toward meeting the "near-term" 2020 GHG emission reduction goals (to the level of 427 MMT CO_2e) defined in the original Scoping Plan. It also evaluates how to align the State's longer-term GHG reduction strategies with other State policy priorities, such as for water, waste, natural resources, clean energy and transportation, and land use. In November 2022, the final 2022 Scoping Plan Update and Appendices was released. This 2022 Scoping Plan Update assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045 (CARB 2022). The 2022 Scoping Plan Update focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the State's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

4.2.7 Assembly Bill 197

AB 197, signed September 8, 2016, is a bill linked to SB 32 that prioritizes efforts to reduce GHG emissions in low-income and minority communities. AB 197 requires CARB to make available, and update at least annually on its website, the emissions of GHGs, criteria pollutants, and TACs for each facility that reports to CARB and air districts. In addition, AB 197 adds two members of the legislature to the CARB board as ex officio, non-voting members and creates the Joint Legislative Committee on Climate Change Policies to ascertain facts and make recommendations to the legislature concerning the State's programs, policies, and investments related to climate change.

4.2.8 Cap-and-Trade Program

The 2008 Climate Change Scoping Plan identified a cap-and-trade program as one of the strategies for California to reduce GHG emissions. The cap-and-trade program is a key element in California's climate plan. It sets a statewide limit on sources responsible for 85% of California's GHG emissions and establishes a price signal needed to drive long-term investment in cleaner fuels and more efficient use of energy. The cap-and-trade rules came into effect on January 1, 2013, and apply to large electric power plants and large industrial plants. In 2015, fuel distributors, including distributors of heating and transportation fuels, also became subject to the cap-and-trade rules. At that stage, the program will encompass around 360 businesses throughout California and nearly 85% of the state's total GHG emissions. Covered entities subject to the cap-and-trade program are sources that emit more than 25,000 metric tons CO_2e ($MTCO_2e$) per year. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule).

Under the cap-and-trade regulation, companies must hold enough emission allowances to cover their emissions and are free to buy and sell allowances on the open market. California held its first auction of GHG allowances on November 14, 2012. California's GHG cap-and-trade system was projected to reduce GHG emissions to 1990 levels by the year 2020 and would achieve an approximate 80% reduction from 1990 levels by 2050.

4.2.9 Assembly Bill 1493 (Pavley I)

AB 1493, passed in 2002, requires the development and adoption of regulations to achieve the maximum feasible reduction in GHG emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHG from passenger vehicles in September 2004, which took effect in 2009. On September 24, 2009, CARB adopted amendments to these regulations that reduce GHG emissions and new passenger vehicles from 2009 through 2016. Although setting emission standards on automobiles is solely the responsibility of the EPA, the federal CAA allows California to set state-specific emission standards on automobiles, and the State first obtains a waiver from the EPA. The EPA granted California that waiver until July 1, 2009. The comparison between the AB 1493 standards and the federal Corporate Average Fuel Economy standards was completed by CARB, and the analysis determined the California emission standards were 16% more stringent through the 2016 model year and 18% more stringent for the 2020 model year. CARB is also committed to further strengthening these standards beginning with 2020 model year vehicles, to obtain a 45% GHG reduction in comparison to 2009 model years.

In March 2020, the EPA issued the Safer Affordable Fuel-Efficient Vehicles Rule (SAFE) which would roll back fuel economy standards and revoke California's waiver. Under this rule, EPA would amend certain average fuel economy and GHG standards for passenger cars covering model years 2021 through 2026. In September 2019, the EPA withdrew the waiver previously provided for California's GHG and

Zero Emission Vehicle (ZEV) programs under Section 209 of the CAA. The withdrawal of the waiver beginning effective on November 26, 2019. In response, several states including California filed a lawsuit challenging the withdrawal of the EPA waiver. These actions continue to be challenged in court. As noted above, on January 20, 2021, President Biden issued an EO directing all executive departments and agencies to take action, as appropriate, to address federal regulations and other actions taken during the last 4 years that conflict with the administration's climate and environmental justice goals, which include SAFE.

4.2.10 Executive Order S-01-07 (California Low Carbon Fuel Standard)

EO S-01-07, the Low Carbon Fuel Standard (LCFS) (issued January 18, 2007), requires a reduction of at least 10% in the carbon intensity of California transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS was directed to CARB. CARB released a draft version of the LCFS in October 2008. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the LCFS became effective on the same day.

The 2017 update identified LCFS as a regulatory measure to reduce GHG emissions to meet the 2030 emissions target. In calculating statewide emissions and targets, the 2017 update assumed that the LCFS would be extended to an 18% reduction in carbon intensity beyond 2020. On September 27, 2018, CARB approved a rulemaking package that amended the LCFS to relax the 2020 carbon intensity reduction from 10% to 7.5% and to require a carbon intensity reduction of 20% by 2030.

4.2.11 Advanced Clean Car Regulations

In 2012, CARB approved the Advanced Clean Cars program, a new emissions control program for model years 2015 through 2025. The components of the advance clean car standards include the Low-Emission Vehicle regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the ZEV regulation, which requires manufacturers to produce an increasing number of pure ZEVs, with provisions to also produce plug-in hybrid electric vehicles in the 2018 through 2025 model years period. In March 2017, CARB voted unanimously to continue with the vehicle GHG emission standards and the ZEV programs for cars and light trucks sold in California through 2025.

4.2.12 Senate Bill 375

This bill requires CARB to set regional emissions reduction targets for passenger vehicles. The Metropolitan Planning Organization for each region must then develop a Sustainable Communities Strategy (SCS) that integrates transportation, land use, and housing policies to plan how it will achieve the emissions target for its region. If the SCS is unable to achieve the regional GHG emissions reductions targets, then the Metropolitan Planning Organization is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target can be achieved through alternative development patterns, infrastructure, and/or transportation measures.

SB 375 requires CARB to update regional GHG emission targets every 8 years, with last update formally adopted March 2018. As part of the 2018 update, CARB has adopted a passenger vehicle–related GHG reduction target of 19% by 2035 for the Association of Bay Area Governments (ABAG) region, which is more stringent than the previous reduction target of 15% for 2035 (ABAG 2018).

4.2.13 Senate Bill 97

Senate Bill 97 (SB 97) was enacted in 2007. SB 97 required Governor's Office of Planning and Research (OPR; now the Governor's Office of Land Use and Climate Innovation) to develop, and the California Natural Resources Agency to adopt, amendments to the State CEQA Guidelines (California Association of Environmental Professionals 2025) addressing the analysis and mitigation of GHG emissions (OPR 2008, 2018). Those CEQA Guidelines (California Natural Resources Agency 2018) amendments clarified several points, including the following:

- Lead agencies must analyze the GHG emissions of proposed projects and must reach a conclusion regarding the significance of those emissions.
- When a project's GHG emissions may be significant, lead agencies must consider a range of potential mitigation measures to reduce those emissions.
- Lead agencies must analyze potentially significant impacts associated with placing projects in hazardous locations, including locations potentially affected by climate change.
- Lead agencies may significantly streamline the analysis of GHGs on a project level by using a programmatic GHG emissions reduction plan meeting certain criteria.
- CEQA mandates analysis of a proposed project's potential energy use (including transportation-related energy), sources of energy supply and ways to reduce energy demand, including through the use of efficient transportation alternatives.

As part of the administrative rulemaking process, the California Natural Resources Agency developed a Final Statement of Reasons explaining the legal and factual basis, intent, and purpose of the CEQA Guidelines amendments (California Natural Resources Agency 2009). The amendments to the State CEQA Guidelines implementing SB 97 became effective on March 18, 2010. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document required by CEQA that has not been finalized.

4.3 Regional

4.3.1 Bay Area Air District

The BAAD is the agency responsible for ensuring that the NAAQS and CAAQS are attained and maintained in the SFBAAB. Air quality conditions in the SFBAAB have improved significantly since BAAD was created in 1955. The BAAD prepares AQMPs to attain ambient air quality standards in the SFBAAB. BAAD prepares O_3 attainment plans for the national O_3 standard and clean air plans for the California O_3 standard. The BAAD prepares these AQMPs in coordination with ABAG and the Metropolitan Transportation Commission to ensure consistent assumptions about regional growth.

4.3.1.1 BAY AREA AIR QUALITY MANAGEMENT DISTRICT 2017 CLEAN AIR PLAN

BAAQMD (now BAAD) adopted the *2017 Clean Air Plan: Spare the Air, Cool the Climate* (2017 Clean Air Plan) on April 19, 2017, making it the most recently adopted comprehensive plan. The 2017 Clean Air Plan incorporates significant new scientific data, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes, and new air quality modeling tools (BAAQMD 2017). The 2017 Clean Air Plan serves as an update to the adopted Bay Area 2010 Clean Air Plan and continues to provide the framework for SFBAAB to achieve attainment of the NAAQS and

CAAQS. The 2017 Clean Air Plan updates the Bay Area's O_3 plan, which is based on the "all feasible measures" approach to meet the requirements of the CCAA. It sets a goal of reducing health risk impacts to local communities by 20% between 2015 and 2020 and lays the groundwork for reducing GHG emissions in the Bay Area to meet the State's 2030 GHG reduction target and 2050 GHG reduction goal. It also includes a vision for the Bay Area in a post-carbon year 2050 that encompasses the following:

- Construct buildings that are energy efficient and powered by renewable energy.
- Walk, bicycle, and use public transit for the majority of trips and use electric-powered autonomous public transit fleets.
- Incubate and produce clean energy technologies.
- Live a low-carbon lifestyle by purchasing low-carbon foods and goods in addition to recycling and putting organic waste to productive use.

A multipollutant control strategy was developed to be implemented in the next 3 to 5 years to address public health and climate change and to set a pathway to achieve the 2050 vision. The control strategy includes 85 control measures to reduce emissions of O_3, particulate matter, TACs, and GHGs from a full range of emission sources. These control measures cover the following sectors: 1) stationary (industrial) sources; 2) transportation; 3) energy; 4) agriculture; 5) natural and working lands; 6) waste management; 7) water; and 8) super-GHG pollutants and 9) buildings. The proposed control strategy is based on the following key priorities:

- Reduce emissions of criteria air pollutants and TACs from all key sources.
- Reduce emissions of "super-GHGs" such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
- Increase efficiency of the energy and transportation systems.
- Reduce demand for vehicle travel, and high-carbon goods and services.
- Decarbonize the energy system.
- Make the electricity supply carbon-free.
- Electrify the transportation and building sectors.

4.3.1.2 COMMUNITY AIR RISK EVALUATION PROGRAM

The BAAD Community Air Risk Evaluation program was initiated in 2004 to evaluate and reduce health risks associated with exposure to outdoor TACs in the Bay Area, primarily diesel PM. The last update to this program was in 2014 (BAAQMD 2014). Based on findings of the latest report, diesel PM was found to account for approximately 85% of the cancer risk from airborne toxics. Carcinogenic compounds from gasoline-powered cars and light-duty trucks were also identified as significant contributors: 1,3-butadiene contributed 4% of the cancer risk-weighted emissions, and benzene contributed 3%. Collectively, five compounds—diesel PM, 1,3-butadiene, benzene, formaldehyde, and acetaldehyde—were found to be responsible for more than 90% of the cancer risk attributed to emissions. All of these compounds are associated with emissions from internal combustion engines. The most important sources of cancer risk-weighted emissions were combustion-related sources of diesel PM, including on-road mobile sources (31%), construction equipment (29%), and ships and harbor craft (13%). Overall, cancer risk from TAC dropped by more than 50% between 2005 and 2015, when emissions inputs accounted for State diesel regulations and other reductions.

The major contributor to acute and chronic non-cancer health effects in the SFBAAB is acrolein (C_3H_4O). Major sources of acrolein are on-road mobile sources and aircraft near freeways and commercial and military airports (BAAQMD 2006). Currently CARB does not have certified emission factors or an analytical test method for acrolein. Since the appropriate tools needed to implement and enforce acrolein emission limits are not available, the BAAD does not conduct health risk screening analysis for acrolein emissions (BAAQMD 2016).

4.3.1.3 ASSEMBLY BILL 617 COMMUNITY ACTION PLANS

AB 617 was signed into law in July 2017 to develop a new community-focused program to reduce exposure more effectively to air pollution and preserve public health in environmental justice communities. AB 617 directs CARB and all local air districts to take measures to protect communities disproportionally impacted by air pollution through monitoring and implementing air pollution control strategies.

On September 27, 2018, CARB approved BAAQMD's recommended communities for monitoring and emission reduction planning. The State approved communities for Year 1 of the program as well as communities that would move forward over the next 5 years. Bay Area recommendations included all the Community Air Risk Evaluation areas, areas with large sources of air pollution (refineries, seaports, airports, etc.), areas identified via statewide screening tools as having pollution and/or health burden vulnerability, and areas with low life expectancy (BAAQMD 2019).

4.3.2 County of San Mateo 2020 Climate Action Plan

The San Mateo County 2022 Community Climate Action Plan (CCAP) outlines priority actions to achieve a 45% reduction of GHG emissions over 1990 levels by 2030 and carbon neutrality by 2040 (County of San Mateo 2025a). The CCAP streamlines the development process by meeting BAAD's requirements for a Qualified GHG Reduction Strategy. The CCAP also supports the goals and policies of AB 32 –The California Global Warming Solutions Act of 2006. The County of San Mateo's (County's) strategies and actions are structured around four focus areas: building energy, transportation, waste and working lands.

Buildings are the second largest contributor to GHG emissions in unincorporated areas of the county, accounting for 32% of all emissions. These emissions stem primarily from the use of natural gas in residential and commercial buildings.

Emissions in the transportation sector come from people driving vehicles (vehicle miles traveled or VMT) on roads within the county. In 2017, this represented 40% of San Mateo County's emissions inventory and remains the largest contributor when compared to the other sectors. Reducing this emissions source will require reducing VMT as well as increasing the community adoption of electric vehicles (EVs). While making this change will require multijurisdictional action beyond San Mateo County's jurisdiction, and will rely upon individual behavior change, the County can still play a critical role. The County can facilitate EV adoption, build the necessary charging infrastructure to enable widespread EV use, increase access to jobs, goods and services in neighborhoods, help its communities shift to active transportation (human-powered forms of transportation including walking, rolling, and biking), and work in partnership to enhance and improve public transit access and ridership.

Waste produced in unincorporated communities is sent to Ox Mountain Landfill where the organic materials decompose and produce methane, which is a GHG. Waste represents a smaller share of overall county emissions at 26%. There are measures designed to prevent materials from entering the landfill

through source reduction and waste diversion actions such as reducing waste generated, reusing materials, composting organics, and recycling.

Rangeland and cropland, including publicly and privately managed lands, compose a large portion of the land base in California and in San Mateo County. These working lands have significant potential for sequestering carbon from the atmosphere, thus serving as a climate mitigation strategy. Active management of working lands can enhance the rate of carbon sequestration in soils and vegetation, therefore carbon farming (i.e., the suite of practices that brings about more sequestration) has a critical role to play in helping San Mateo County develop resilience to climate change while simultaneously reducing atmospheric GHGs driving climate change.

4.3.3 County of San Mateo General Plan

The County's General Plan (County of San Mateo 2025b) is the County's vision for future development. It identifies goals, policies, and objectives to govern the physical development of San Mateo County. State law requires each city and county to adopt a General Plan with a minimum of seven elements: Land Use, Circulation, Housing, Conservation, Open-Space, Noise, and Safety. The General Plan contains 17 chapters addressing each of the required elements and additional elements such as transportation and climate change. Many of the general plan policies affect air quality and GHG emissions for the county. For example, Chapter 17, Climate Element (County of San Mateo 2022) demonstrates the County's commitment to achieve energy efficiency and mitigate its impact on climate change by reducing GHG emissions consistent with state legislation.

4.3.4 Shape SSF: 2040 General Plan

Shape SSF: 2040 General Plan (City of South San Francisco 2022a) outlines the City's long-term vision through 2040, covering land use, housing, mobility, environmental stewardship, resilience, climate protection, and more. Part IV of the plan, Our Environment—which includes chapters on Climate Protection, Environmental & Cultural Stewardship, and Community Resilience—sets the foundation for the city's environmental and climate policies. The city aims for a carbon-neutral community by 2045. To support that, the plan calls for a regularly updated Climate Action Plan (CAP) and periodic GHG inventories (both community-wide and municipal) to monitor progress. The plan explicitly encourages the use of emerging technologies and innovative pilot programs to reduce emissions across sectors: buildings and energy, transportation, waste, and water—including carbon sequestration via green infrastructure.

4.3.5 City of South San Francisco Climate Action Plan

South San Francisco aims to reduce communitywide GHG emissions 40% by 2030, and to reach a carbon-neutral community by 2045 (City of South San Francisco 2022b). More broadly, the South San Francisco Climate Action Plan (CAP) commits to reduce energy and water use, minimize waste sent to landfills, and increase resilience — including through green buildings, sustainable municipal infrastructure, clean energy, and waste diversion.

5 THRESHOLDS OF SIGNIFICANCE

5.1 Air Quality

Based upon the environmental checklist presented in Appendix G of the State CEQA Guidelines, the project would have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan (Impact AQ-1);
- Result in cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under applicable federal or state ambient air quality standards (Impact AQ-2);
- Expose sensitive receptors to substantial pollutant concentrations (Impact AQ-3); or
- Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people (Impact AQ-4).

The BAAD CEQA Air Quality Guidelines assist in the evaluation of air quality impacts of projects and plans proposed within the Bay Area. The guidelines provide recommended procedures for evaluating potential air impacts during the environmental review process, consistent with CEQA requirements, and include recommended thresholds of significance, mitigation measures, and background air quality information. They also include recommended assessment methodologies for air toxics, odors, and GHG emissions. These thresholds are designed to establish the level at which the Applicant believes air pollution emissions would cause significant environmental impacts under CEQA. Table 2 presents the criteria air pollutant significance thresholds for the BAAD region.

Table 2. BAAD Regional (Mass Emission) Criteria Air Pollutant Significance Thresholds

	Construction Phase	Operational Phase	
Pollutant	**Average Daily Emissions (pounds/day)**	**Average Daily Emissions (pounds/day)**	**Maximum Annual Emissions (tons/year)**
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	82 (exhaust)	54	10
PM_{10} and $PM_{2.5}$ fugitive dust	Best management practices	None	None

Source: BAAD (2025a)

ROG = reactive organic gases

Projects that do not exceed the emissions in Table 2 would not cumulatively contribute to health effects in the SFBAAB. If projects exceed the emissions in Table 2, emissions would cumulatively contribute to the nonattainment status and would contribute to increased health effects associated with these criteria air pollutants. Known health effects related to O_3 include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Reducing emissions would further contribute to reducing possible health effects related to criteria air pollutants.

However, for projects that exceed the emissions in Table 2, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or with how many additional individuals in the air basin would be affected by the health effects cited above. The BAAD is the primary agency responsible for ensuring the health and welfare of sensitive individuals to elevated concentrations of air quality in the SFBAAB and at the present time, it has not provided methodology to assess the specific correlation between mass emissions generated and the effect on health in order to address the issue raised in *Sierra Club v. County of Fresno (Friant Ranch, L.P.)* (2018) 6 Cal.5th 502, Case No. S21978.

Ozone concentrations are dependent upon a variety of complex factors, including the presence of sunlight and precursor pollutants, natural topography, nearby structures that cause building downwash, atmospheric stability, and wind patterns. Because of the complexities of predicting ground-level O_3 concentrations in relation to the NAAQS and CAAQS, it is speculative to link health risks to the magnitude of emissions exceeding the significance thresholds. To achieve the health-based standards established by the EPA, the air districts prepare AQMPs that detail regional programs to attain the NAAQS and CAAQS. However, if a project within the BAAD exceeds the regional significance thresholds, the project could contribute to an increase in health effects until such time as the attainment standards are met in the SFBAAB.

In addition, congested intersections have the potential to create elevated concentrations of CO, referred to as CO hotspots. The significance criteria for CO hotspots are based on the CAAQS for CO, which are 9.0 parts per million (ppm) (8-hour average) and 20.0 ppm (1-hour average). With the turnover of older vehicles, introduction of cleaner fuels, and implementation of control technology, the SFBAAB is in attainment of the CAAQS and NAAQS, and CO concentrations in the SFBAAB have steadily declined. Because CO concentrations have improved, the BAAD does not require a CO hotspot analysis if the following criteria are met (CARB 2014):

- The project is consistent with an applicable congestion management program established by the County Congestion Management Agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- The project would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.

The project would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

5.1.1 Toxic Air Contaminants

The BAAD's significance thresholds for local community risk and hazard impacts apply to both the siting of a new source and the siting of a new receptor. Local community risk and hazard impacts are associated with TACs and $PM_{2.5}$ because emissions of these pollutants can have significant health impacts at the local level. The proposed project would generate TACs and $PM_{2.5}$ during construction activities that could elevate concentrations of air pollutants at the nearby residential, day care, and school-based sensitive receptors. The thresholds for construction-related local community risk and hazard impacts are the same as those for project operations. BAAD has adopted screening tables for air toxics evaluation during construction (BAAD 2017, 2025a). Construction-related TAC and $PM_{2.5}$ impacts should be addressed on a case-by-case basis, taking into consideration the specific construction-related characteristics of each project and proximity to off-site and on-site receptors, as applicable.

Project-level emissions of TACs or $PM_{2.5}$ from individual sources that exceed any of the thresholds listed below are considered a potentially significant community health risk:

- An excess cancer risk level of more than 10 in one million, or a non-cancer (i.e., chronic or acute) hazard index greater than 1.0 would be a significant project contribution.
- An incremental increase of greater than 0.3 µg/m³ annual average $PM_{2.5}$ from a single source would be a significant project contribution.

Cumulative sources represent the combined total risk values of each of the individual sources within the 1,000-foot evaluation zone. A project would have a cumulative considerable impact if the aggregate total of all past, present, and foreseeable future sources within a 1,000-foot radius from the fence line of a source or location of a receptor, plus the contribution from the project, exceeds any of the following:

- An excess cancer risk level of more than 100 in one million or a chronic non-cancer hazard index (from all local sources) greater than 10.0
- 0.8 µg/m³ annual average $PM_{2.5}$

In February 2015, the OEHHA adopted new health risk assessment guidance that includes several efforts to be more protective of children's health. These updated procedures include the use of age sensitivity factors to account for the higher sensitivity of infants and young children to cancer-causing chemicals, and age-specific breathing rate (OEHHA 2025). See Table 1 in Appendix B for the BAAD health risk screening thresholds used for the health risk assessment.

5.2 Greenhouse Gases

Consistent with Appendix G of the State CEQA Guidelines, a project would have a significant GHG impact if it would

- Generate GHG emissions, either directly or indirectly, that may have an adverse effect on the environment (Impact GHG-1); or
- Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs (Impact GHG-2).

State CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions projects and consider several other factors that may be used in the determination of significance of project-related GHG emissions, including 1) the extent to which the project may increase or reduce GHG emissions; 2) whether the project exceeds an applicable significant threshold; and 3) the extent to which the project complies with the regulations or requirements adopted to implement a reduction or mitigation of GHG.

Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look at thresholds developed by other public agencies or suggested by other experts, such as CAPCOA, as long as any threshold chosen is supported by substantial evidence (see State CEQA Guidelines Section 15064.7(c)). The State CEQA Guidelines also clarify that the events of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see State CEQA Guidelines Section 15130(f)). It is noted that the State CEQA Guidelines were amended in response to SB 97. In particular, the State CEQA Guidelines were amended to specify that compliance with the GHG emissions reduction plan renders a cumulative impact less than significant.

Per State CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions" (14 CCR Section 15064(h)(3)). Put another way, State CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

Although GHG emissions can be quantified, CARB, BAAD, and the County have not adopted quantitative project-level significance thresholds for GHG emissions that would be applicable to the project. Per State CEQA Guidelines Section 15064.4(b), "in determining the significance of a project's greenhouse gas emissions, the lead agency should focus its analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. A project's incremental contribution may be cumulatively considerable even if it appears relatively small compared to statewide, national or global emissions." When determining the significance of GHG impacts, lead agencies should consider the project's impact as compared to the existing environmental setting, whether the project exceeds a threshold of significance, and compliance with relevant GHG-related plans (see, for example, State CEQA Guidelines Section 15064.4(b)). Regarding the latter criterion, lead agencies should consider "the extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions (see, for example, State CEQA Guidelines Section 15183.5(b))." Per State CEQA Guidelines Section 15064.4(b)(3), such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions.

For the project, no quantitative threshold has been adopted to evaluate significance for GHG emissions to address the State's more recent GHG reduction target of achieving carbon neutrality by 2045, per EO B-55-18 (2018). To achieve carbon neutrality by 2045, it is recommended that future development include measures to support building decarbonization, including the replacement of natural gas service with other alternatives, such as use of electrically powered equipment (CARB 2022; CEC 2021). Based on recent GHG threshold updates and supportive documentation prepared by the BAAD, the thresholds are now focused on the design of a project as well as building operations and transportation. At a minimum, building projects cannot include natural gas appliances or natural gas plumbing and cannot result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and State CEQA Guidelines Section 15126.2(b). For transportation, the project operations must also achieve a reduction in project-generated VMT below the regional average consistent with the current version of the Climate Change Scoping Plan or meet a locally adopted VMT target. 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 (BAAD 2025). Alternatively, a project for which these design elements are not implemented could still be determined to make a less-than-significant contribution of GHG emissions by demonstrating consistency with a local GHG reduction strategy that is consistent with state guidance, the South San Francisco CAP (State CEQA Guidelines Section 15183.5[b]).

6 ENVIRONMENTAL EVALUATION

Would the project conflict with or obstruct implementation of the applicable air quality plan? (Impact AQ-1)

Less-than-Significant Impact. The 2017 Clean Air Plan (BAAD 2017) is the current applicable regional air quality plan (AQP) for the SFBAAB. The primary goals of the 2017 Clean Air Plan are to protect public health and protect the climate, and the plan acknowledges that these two stated goals of protection are closely related. As such, the 2017 Clean Air Plan identifies a wide range of control measures intended to decrease both criteria pollutants and GHG emissions. Determining consistency with the 2017 Clean Air Plan involves assessing whether applicable control measures contained in the 2017 Clean Air Plan are implemented and whether implementation of the proposed project would disrupt or hinder implementation of AQP control measures. The control measures are organized into five categories: 1) stationary and area source control measures; 2) mobile source measures; 3) transportation control measures; 4) land use and local impact measures; and 5) energy and climate measures. The control measures are geared toward traditional land uses (e.g., residential, commercial, industrial uses) and buildings. All control measures contained in the 2017 Clean Air Plan applicable to the project will be implemented. In addition, all projects within BAAD's jurisdiction are required to implement the BAAD standard control measures or best management practices (BMPs) during construction activities. As discussed in Section 8 below, the proposed project would implement all BMPs for construction activities and would be consistent with the assumptions in the AQP. The project would not significantly increase employment, population, or growth within the region. The project does not include residential development or large local or regional employment centers and thus would not result in significant population or employment growth. Furthermore, the proposed project would not include any special features that would disrupt or hinder implementation of the AQP control measures. Therefore, the proposed project would not obstruct implementation of the 2017 Clean Air Plan.

Furthermore, the thresholds of significance, adopted by BAAD, determine compliance with the goals of attainment plans in the region. As such, emissions below the BAAD significance thresholds would not conflict with or obstruct implementation of the applicable AQPs. As Table 3 and Table 4 show, the emissions from project construction and operations are below the thresholds of significance; therefore, the project does not conflict with implementation of the BAAD applicable AQPs.

Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard? (Impact AQ-2)

Less-than-Significant Impact. The BAAD's thresholds of significance represent the allowable emissions a project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAD thresholds of significance on a project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. The region is in nonattainment for federal and state O_3 standards, and federal and state $PM_{2.5}$ standards. Impacts related to construction and operation of the proposed project are addressed separately below.

CONSTRUCTION

Project implementation would generate emissions of criteria air pollutants during construction. Unmitigated emissions were calculated using the construction assumptions above and detailed in Appendix A (Table 3). Mitigation was not required for the project's emissions to be below the BAAD

significance thresholds for CAPs but do reflect the BMPs required for all projects (see Section 8). The detailed assumptions and calculations, as well as CalEEMod outputs, are provided in Appendix A.

Table 3. Unmitigated Construction Emissions Summary

Construction Year	Unmitigated Construction Emissions Summary					
	ROG	**NOx**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
Pollutant Emission (pounds per day)						
2026 Average Daily Emission	0.49	1.95	2.97	0.77	0.18	0.004
2027 Average Daily Emission	0.02	0.17	0.23	0.10	0.02	< 0.005
BAAD Significance Thresholds	*54*	*54*	*N/A*	*82*	*54*	*N/A*
Threshold Exceeded?	*No*	*No*	*N/A*	*No*	*No*	*N/A*
Pollutant Emission (tons per year)						
2026 Maximum Annual	0.09	0.36	0.54	0.14	0.03	< 0.005
2027 Maximum Annual	<0.01	0.03	0.04	0.02	<0.01	< 0.005
BAAD Significance Thresholds	*10*	*10*	*N/A*	*15*	*10*	*N/A*
Threshold Exceeded?	*No*	*No*	*N/A*	*No*	*No*	*N/A*

Note: Emissions were quantified using CalEEMod version 2022.1.1.33 (CAPCOA 2022). Model results (summer, winter, and annual) and assumptions are provided in Appendix A.

Totals may not sum due to rounding.

N/A = Not applicable, no threshold; ROG = reactive organic gases

As Table 3 shows, estimated unmitigated construction emissions for all pollutants are below BAAD significance thresholds. The combined construction emissions from all components of the proposed project are below the recommended BAAD thresholds of significance. Therefore, project construction would have a less-than-significant impact. However, BAAD standard control measures have been included to further reduce localized impacts (see Section 8).

OPERATIONS

Project operations would generate VOC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from mobile sources, including vehicle trips, and water sources. The estimated emissions from operation of the project are summarized in Table 4. Complete details of the emissions calculations are provided in Appendix A.

Table 4. Unmitigated Operational Emissions Summary

Operation Year 2028	Unmitigated Operational Emissions Summary					
	ROG	**NOx**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_2**
Pollutant Emission (pounds per day)						
Mobile	2.32	1.16	14.09	3.30	0.85	0.03
Area	0.28	0.003	0.38	<0.01	<0.01	<0.001
Energy	0.01	0.10	0.08	0.01	0.01	<0.001
Water	0	0	0	0	0	0
Waste	0	0	0	0	0	0
Refrigeration	0	0	0	0	0	0
Total	**2.61**	**1.26**	**14.56**	**3.31**	**0.86**	**0.04**

BAAD Significance Thresholds	*54*	*54*	*N/A*	*82*	*54*	*N/A*
Threshold Exceeded?	*No*	*No*	*N/A*	*No*	*No*	*N/A*
Pollutant Emission (tons per year)						
Mobile	0.31	0.18	1.96	0.46	0.12	0.004
Area	0.04	<0.01	0.03	<0.01	<0.01	<0.001
Energy	<0.01	0.01	0.01	<0.01	<0.01	<0.001
Water	0	0	0	0	0	0
Waste	0	0	0	0	0	0
Refrigeration	0	0	0	0	0	0
Total	**0.35**	**0.20**	**2.01**	**0.46**	**0.12**	**0.005**
BAAD Significance Thresholds	*10*	*10*	*N/A*	*15*	*10*	*N/A*
Threshold Exceeded?	*No*	*No*	*N/A*	*No*	*No*	*N/A*

Source: Emissions were quantified using CalEEMod version 2022.1.1.33 (CAPCOA 2022). Model results (summer, winter, and annual) and assumptions are provided in Appendix A.

Totals may not sum due to rounding.

N/A = Not applicable, no threshold; ROG = reactive organic gases

As Table 4 shows, estimated unmitigated operational emissions for all pollutants are below BAAD significance thresholds. Also, project operations would meet the BAAD CO hotspot analysis screening criteria regarding traffic volumes at any affected intersection. Therefore, the proposed project would not need a CO hotspot analysis. Therefore, based on the above criteria, the proposed project would have a less-than-significant impact related to CO hotspots.

The combined construction emissions and combined operational emissions from all components of the proposed project are below the recommended BAAD thresholds of significance. Therefore, the project would not be anticipated to exceed any significance threshold and would have a less-than-significant contribution to cumulative impacts with mitigation.

Would the project expose sensitive receptors to substantial pollutant concentrations? (Impact AQ-3)

Less-Than-Significant Impact. Some population groups, such as children, the elderly, and acutely and chronically ill persons are considered more sensitive to air pollution than others. Sensitive receptor locations typically include residential areas, hospitals, eldercare facilities, rehabilitation centers, daycare centers, and parks. The preschool is located near the single-family residences adjacent to the north, east, and south of the project site. The Westborough Middle School is located about 1,145 feet to the west of the project site. Sensitive receptors on the project site include the preschool classrooms where children congregate throughout the school day.

While criteria air pollutants (such as particulate matter [PM_{10} and $PM_{2.5}$]) are a concern at the regional level, community risk impacts from TACs and annual $PM_{2.5}$ exposure to nearby sensitive receptors are also a localized concern. While the discussion under Impact AQ-2 above addressed particulate matter at the regional level, this impact addresses particulate matter at the localized level. Operation of the project is not expected to cause any localized emissions that could expose sensitive receptors to unhealthy air pollutant levels, because no stationary sources of TACs, such as generators, are proposed as part of the project and none of the modernizations would increase current operational emissions. However, the project is a sensitive receptor that could be exposed to existing sources of TACs. Project-related construction activity would temporarily generate dust and equipment exhaust that could affect nearby sensitive receptors.

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAD CEQA Air Quality Guidelines consider these impacts to be less than significant if BMPs are employed to reduce these emissions. The project would comply with all control measures in Section 8.

Construction equipment and associated heavy-duty truck traffic would also generate diesel exhaust, which is a known TAC. Construction exhaust emissions may pose community risks for sensitive receptors such as nearby residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust poses both a potential health and nuisance impact to nearby receptors.

A community risk assessment was conducted to evaluate potential health effects on sensitive receptors at these nearby residences from construction emissions of diesel PM and $PM_{2.5}$. Results are presented in a health risk assessment in Appendix B. Emissions and dispersion modeling was conducted to predict the diesel PM concentrations resulting from project construction, so that lifetime cancer risks and non-cancer health effects could be evaluated at each sensitive receptor. This dispersion modeling was completed using the CalEEMod results presented in Appendix A. As shown in Table 2 of Appendix B (p. 5), for the Maximally Exposed Individual Resident (MEIR) the excess cancer risk level for unmitigated diesel PM was 7.1 in one million which would not exceed the 10 in one million TAC threshold of significance and the unmitigated annual average $PM_{2.5}$ was 0.06 $\mu g/m^3$, which would not exceed the 0.3 $\mu g/m^3$ annual average $PM_{2.5}$ threshold of significance. For the On-Site Student, the average annual concentration for the unmitigated annual average $PM_{2.5}$ was 0.02 $\mu g/m^3$, which does not exceed the 0.3 $\mu g/m^3$ annual average $PM_{2.5}$ threshold of significance, and the excess cancer risk for unmitigated diesel PM was 1.0 in one million, which would not exceed the 10 in one million TAC threshold of significance. Table 2 in Appendix B shows the health risks during project construction would be below the TAC and $PM_{2.5}$ significance thresholds. The project's construction emissions from particulate exhaust matter, which is used to represent diesel PM, would be less than 1 pound per day and 0.02 ton per year as shown in Appendix A. The project's operations emissions from particulate exhaust matter would be less than 0.05 pound per day and 0.01 ton per year, as shown in Appendix A. Therefore, TAC emissions would be low and consistent with TAC-related rules and regulations and would have a less-than-significant impact. Estimates of the cumulative health risks for the MEIR for the project are summarized and compared to the BAAD's cumulative thresholds of significance in Table 3 of Appendix B (p. 6). As shown in Table 3, the cumulative cancer risk, chronic hazard index, and annual average $PM_{2.5}$ concentration at the MEIR would be below the BAAD's cumulative thresholds. Therefore, implementation of the project would not expose existing sensitive receptors to substantial concentrations of TACs and $PM_{2.5}$ that would be considered cumulatively considerable.

As discussed, NOA is prevalent in at least 44 of California's 58 counties. When broken or crushed, asbestos may become released and become airborne, causing a potential health hazard. BAAD Regulation 11, Rule 2, in addition to the ATCMs, controls emissions of asbestos to the atmosphere during demolition, renovation, milling, and manufacturing and establishes appropriate waste disposal procedures. The project is not located in a geologic setting with a potential to host asbestos; therefore, NOA asbestos would not be an issue for this project (CARB 2000a).

Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? (Impact AQ-4)

Less-than-Significant Impact. Odors are generally regarded as an annoyance rather than a health hazard. Manifestations of a person's reaction to odors can range from psychological (e.g., irritation, anger, or anxiety) to physiological (e.g., circulatory and respiratory effects, nausea, vomiting, and headache). The ability to detect odors varies considerably among the population and overall is quite subjective. People may have different reactions to the same odor. An odor that is offensive to one person may be perfectly acceptable to another (e.g., coffee roaster). An unfamiliar odor is more easily detected and is more likely to cause complaints than a familiar one. In a phenomenon known as odor fatigue, a person can become desensitized to almost any odor, and recognition may only occur with an alteration in the intensity. The occurrence and severity of odor impacts depends on the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receptors.

The project would not be a source of any odors during operations. During construction, a limited number of diesel engines would be operated on the project site for limited durations. Diesel exhaust and VOCs from these diesel engines would be emitted during construction of the proposed project, which are objectionable to some; however, the duration of construction activities is expected to last approximately 12 months, emissions would disperse rapidly from the project site, and diesel exhaust odors would be consistent with existing vehicle odors in the area. Considering this information, construction and operation of the proposed project would not create other emissions or odors adversely affecting a substantial number of people; impacts would be less than significant.

Would the project generate GHG emissions, either directly or indirectly, that may have an adverse effect on the environment? (Impact GHG-1)

Less-than-Significant Impact. Construction of the project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road vendor trucks, and worker vehicles. Total GHG emissions from all phases of construction activities were amortized over the estimated 30-year life of the project and added to the annual operational emissions of GHGs.

Project construction GHG emissions were calculated and amortized over a 30-year project lifetime. CalEEMod was used to calculate the annual GHG emissions based on the construction scenario described. However, on April 20, 2023, the BAAQMD (now BAAD) adopted changes to its thresholds for evaluating the significance of climate impacts from land use projects and plans under CEQA. In place of numerical thresholds, the focus will be on the design of a project as well as building operations and transportation. For construction, BAAD requires GHG emissions for the project to be calculated and presented. Table 5 presents construction GHG emissions.

Table 5. Estimated Annual Construction Greenhouse Gas Emissions

Construction Years	CO_2e	CO_2	N_2O	CH_4
	Metric Tons CO_2 Equivalent per Year			
2026	2,387	2,362	0.12	0.12
2027	916	908	0.02	0.04
Total	**3,303**	**3,270**	**0.14**	**0.16**
		Amortized construction emissions		***110.1***

As shown in Table 5, the estimated total GHG emissions during construction would be approximately 3,303 $MTCO_2e$ over the construction period. Estimated project-generated construction emissions

amortized over 30 years would be approximately 110.1 $MTCO_2e$ per year. As with project-generated construction criteria air pollutant emissions, GHG emissions generated during construction of the project would occur only when construction is active, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions.

Operation of the project would generate GHG emissions through motor vehicle trips to and from the project site, area, energy, waste and water use. CalEEMod was used to calculate the annual GHG emissions based on the operational assumptions described in Section 2.2 and are presented in Appendix A. As discussed, the BAAD adopted changes to its thresholds for evaluating the significance of climate impacts and current guidance now focused on the design of a project as well as building operations and transportation. At a minimum, building projects cannot include natural gas appliances or natural gas plumbing and cannot result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and State CEQA Guidelines Section 15126.2(b). The project will not use natural gas and will not result in any wasteful, inefficient, or unnecessary energy usage. The project operations must also achieve a reduction in project-generated VMT below the regional average consistent with the current version of the Climate Change Scoping Plan or meet a locally adopted VMT target, and VMT thresholds for San Mateo County are determined on a case-by-case basis. The project maintains a total of 59 stalls, would increase student capacity to 100 children and require up to 15 staff on-site; therefore, it is not expected to significantly increase students or permanent employees. In addition, the transportation report determined that the project is a local-serving facility and therefore is presumed to generate VMT below the regional average consistent with BAAD guidance and verified by the County's VMT Estimation Tool. The project is also consistent with the local GHG reduction strategy, the South San Francisco CAP, which meets the criteria under State CEQA Guidelines Section 15183.5(b) and is discussed further below.

The project will be consistent with local GHG reduction strategies meeting the criteria under State CEQA Guidelines Section 15183.5(b). Therefore, construction- and operation-related GHG emissions would be less than significant.

Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs? (Impact GHG-2)

Less-than-Significant Impact. *Shape SSF: 2040 General Plan* (City of South San Francisco 2022a) outlines plans to achieve a carbon-neutral community by 2045, which is consistent with the goals outlined in the South San Francisco CAP (City of South San Francisco 2022b).

The South San Francisco CAP is intended to establish an analytical pathway per CEQA Guidelines Section 15183.5(b) to allow projects to be analyzed through a streamlined or tiered approach utilizing an adopted Greenhouse Gas Reduction Plan. Whereas the *Shape SSF: 2040 General Plan* EIR was certified and the South San Francisco CAP was adopted, the updated South San Francisco CAP is considered a qualified GHG Reduction strategy.

Accordingly, and pursuant to CEQA Guidelines Section 15183.5(b)(2), the South San Francisco CAP is used in the analysis of the project to identify those requirements specified in the South San Francisco CAP that apply to the project, and providing substantial evidence to demonstrate the project's compliance with the specific requirements of the South San Francisco CAP. This analysis identifies those Actions of the South San Francisco CAP that apply to the project, and a discussion of the project’s compliance with those Actions.

Consistent with Clean Energy and Built Environment Actions, the project will comply with all CALGreen energy efficiency codes and strive to surpass the minimum requirements with energy efficient appliances

and building practices. By obtaining its electrical needs from Peninsula Clean Energy's renewable energy portfolio (and delivered by Pacific Gas & Electric (PG&E)), this CAP Action can be achieved. Natural gas will not be utilized for project construction or operations and operations will utilize electric building systems.

Consistent with the Transportation and Land Use Actions, the project is required to and shall implement and monitor a Transportation Demand Management (TDM) Plan. The purpose of the TDM Plan is to provide options to encourage future employers and employees to use non-automobile transportation modes, to encourage carpooling, biking, walking and transit use, and to incorporate on-site design features to promote the same. A TDM plan meeting the City's Tier 2 requirements will be initiated at the start of the project, consistent with South San Francisco's City TDM Ordinance and South San Francisco CAP Transportation Action. In addition, the proposed parking plan maintains a total of 59 stalls: pickup/dropoff stalls would increase by three and would be moved to the north end of the parking lot. Handicapped stalls would increase by one, three regular stalls would be converted to compact stalls, and regular stalls would decrease from 56 to 50, which will include three electric vehicle charging stations (EVCS) consistent with parking requirements of the South San Francisco CAP and CALGreen.

Consistent with Waste Actions, the project shall enroll in the city's three-container organic waste collection services with source-separated recyclable materials, thereby assisting in the reduction of landfill methane emissions. Additionally, the project will arrange for and have solid waste collection service, with solid waste, recyclable materials and salvageable materials (including organics/food waste) separated for collection by the city's authorized recycling agent. Consistent with Water and Wastewater Actions, the project will comply with CALGreen building standards, including those standards pertaining to water efficiency. The current CALGreen standards contain mandatory measures for water-efficient fixtures and equipment in new buildings, and the project will be required to comply with these measures. The project would replace and add new wastewater, water, and stormwater drainage throughout the project site. The South San Francisco CAP Water and Wastewater Actions requires projects to meet a higher efficiency standard, comparable to the CALGreen "voluntary" Tier 1 or Tier 2 standards. The Project will be required to meet these higher standards pursuant to future building permits in order to demonstrate compliance with the South San Francisco CAP. Consistent with Carbon Sequestration Actions, project landscaping would include drought tolerant and native species with new efficient drip irrigation that meets state Water Efficient Landscape Ordinance (WELO) requirements. Five planting areas would be added on-site for stormwater bioretention and treatment.

Based on the above analysis, the project is, and/or will be required to demonstrate consistency with the South San Francisco CAP. The project's proposed development plans indicate that the project will be consistent with individual CAP Actions related to clean energy, building design, transportation and land use, solid waste, water and wastewater, and carbon sequestration. The project does not present any inherent inconsistencies with other South San Francisco CAP Actions. Based on the project's consistency with applicable CAP Actions, the project meets the CEQA threshold of less than a significant impact for GHG by being consistent with the South San Francisco CAP.

The project would also be consistent with the policies, regulations, or guidelines in the General Plan, 2017 Clean Air Plan, or any other applicable plans and/or regulations adopted for the purposes of reducing GHG emissions. Furthermore, GHG emissions from the project, as shown Appendix A, would not generate substantial GHG emissions during construction or operation. Therefore, impacts would be less than significant.

7 CONCLUSION

The proposed project would result in minimal criteria pollutant emissions during construction and operation and would not exceed any BAAD thresholds. The project would not expose sensitive receptors to substantial pollutant concentrations and would not be a source of odors or other adverse emissions. Therefore, the project would not result in impacts related to air quality.

8 STANDARD CONTROL MEASURES AND MITIGATION MEASURES

Mitigation will not be necessary; however, all construction projects within BAAD jurisdiction must comply with the BMPs regarding fugitive dust, GHG, and equipment exhaust emissions. The BMPs to be included in the project consistent with regional rules and regulations are as follows:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, unpaved access roads) shall be watered with non-potable water two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- 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.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- 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 in 13 CCR Section 2485). Clear signage shall be provided for construction workers at all access points.
- 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. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City of South San Francisco regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAD's phone number shall also be visible to ensure compliance with applicable regulations.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

Implementation of these control measures would ensure that the recommended BAAD BMPs are implemented to reduce impacts. The BAAD's standard control measures should be stipulated in contract requirements and detailed on all construction plans.

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APPENDIX A

CalEEMod Results

Air Pollutant and Greenhouse Gas Emission Calculation

Westborough Preschool Expansion V3 Detailed Report

Table of Contents

1. Basic Project Information

1.1. Basic Project Information

Data Field	Value
Project Name	Westborough Preschool Expansion V3
Construction Start Date	2/16/2026
Operational Year	2027
Lead Agency	—
Land Use Scale	Project/site
Analysis Level for Defaults	County
Windspeed (m/s)	4.6
Precipitation (days)	43
Location	37.644597125846445, -122.45702711301892
County	San Mateo
City	South San Francisco
Air District	Bay Area AQMD
Air Basin	San Francisco Bay Area
TAZ	1218
EDFZ	1
Electric Utility	Pacific Gas & Electric Company
Gas Utility	Pacific Gas & Electric
App Version	2022.1.1.35

1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Day-Care Center	21	1000sqft	0.48	8,823	1,400	0.00	—	—

Parking Lot	6.6	1000sqft	0.15	0.00	300	0.00	—	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.1. Construction Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	19	19	8.1	11	0.02	0.31	1.2	1.5	0.28	0.18	0.47	—	2,306	2,306	0.12	0.09	2.1	2,337
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1.4	1.1	9.8	11	0.02	0.42	3.2	3.6	0.39	1.2	1.6	—	2,362	2,362	0.12	0.12	0.06	2,387
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.56	0.49	2.0	3.0	< 0.005	0.06	0.71	0.78	0.06	0.12	0.18	—	791	791	0.05	0.05	0.51	807
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.10	0.09	0.36	0.54	< 0.005	0.01	0.13	0.14	0.01	0.02	0.03	—	131	131	0.01	0.01	0.08	134

2.2. Construction Emissions by Year, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Year	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily - Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

2026	19	19	8.1	11	0.02	0.31	1.2	1.5	0.28	0.18	0.47	—	2,306	2,306	0.12	0.09	2.1	2,337
Daily - Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	1.4	1.1	9.8	11	0.02	0.42	3.2	3.6	0.39	1.2	1.6	—	2,362	2,362	0.12	0.12	0.06	2,387
2027	0.32	0.27	1.9	2.6	0.01	0.07	1.1	1.2	0.06	0.16	0.22	—	908	908	0.04	0.02	0.03	916
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.56	0.49	2.0	3.0	< 0.005	0.06	0.71	0.78	0.06	0.12	0.18	—	791	791	0.05	0.05	0.51	807
2027	0.03	0.02	0.17	0.23	< 0.005	0.01	0.09	0.10	0.01	0.01	0.02	—	82	82	< 0.005	< 0.005	0.04	83
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
2026	0.10	0.09	0.36	0.54	< 0.005	0.01	0.13	0.14	0.01	0.02	0.03	—	131	131	0.01	0.01	0.08	134
2027	0.01	< 0.005	0.03	0.04	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	14	14	< 0.005	< 0.005	0.01	14

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.8	2.6	1.3	15	0.04	0.03	3.3	3.3	0.03	0.83	0.86	17	3,679	3,696	1.8	0.14	9.3	3,794
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.7	2.5	1.5	15	0.03	0.03	3.3	3.3	0.03	0.83	0.86	17	3,528	3,544	1.9	0.16	0.27	3,639
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2.1	1.9	1.1	11	0.03	0.02	2.5	2.5	0.02	0.63	0.65	17	2,774	2,791	1.8	0.12	3.1	2,875
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	0.38	0.35	0.20	2.0	< 0.005	< 0.005	0.45	0.46	< 0.005	0.11	0.12	2.7	459	462	0.30	0.02	0.52	476

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.5	2.3	1.2	14	0.03	0.02	3.3	3.3	0.02	0.83	0.85	—	3,533	3,533	0.17	0.14	9.3	3,588
Area	0.28	0.28	< 0.005	0.38	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.6	1.6	< 0.005	< 0.005	—	1.6
Energy	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	141	141	0.01	< 0.005	—	142
Water	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Waste	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	2.8	2.6	1.3	15	0.04	0.03	3.3	3.3	0.03	0.83	0.86	17	3,679	3,696	1.8	0.14	9.3	3,794
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	2.4	2.3	1.4	15	0.03	0.02	3.3	3.3	0.02	0.83	0.85	—	3,383	3,383	0.20	0.15	0.24	3,435
Area	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Energy	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	141	141	0.01	< 0.005	—	142
Water	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Waste	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	2.7	2.5	1.5	15	0.03	0.03	3.3	3.3	0.03	0.83	0.86	17	3,528	3,544	1.9	0.16	0.27	3,639
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1.8	1.7	0.99	11	0.03	0.02	2.5	2.5	0.01	0.63	0.64	—	2,629	2,629	0.14	0.11	3.1	2,670
Area	0.25	0.25	< 0.005	0.19	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.78	0.78	< 0.005	< 0.005	—	0.78
Energy	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	141	141	0.01	< 0.005	—	142
Water	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Waste	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	2.1	1.9	1.1	11	0.03	0.02	2.5	2.5	0.02	0.63	0.65	17	2,774	2,791	1.8	0.12	3.1	2,875
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	0.33	0.31	0.18	2.0	< 0.005	< 0.005	0.45	0.46	< 0.005	0.11	0.12	—	435	435	0.02	0.02	0.52	442
Area	0.05	0.04	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.13	0.13	< 0.005	< 0.005	—	0.13
Energy	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23	23	< 0.005	< 0.005	—	23
Water	—	—	—	—	—	—	—	—	—	—	—	0.29	0.55	0.84	0.03	< 0.005	—	1.8
Waste	—	—	—	—	—	—	—	—	—	—	—	2.4	0.00	2.4	0.24	0.00	—	8.6
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	0.38	0.35	0.20	2.0	< 0.005	< 0.005	0.45	0.46	< 0.005	0.11	0.12	2.7	459	462	0.30	0.02	0.52	476

3. Construction Emissions Details

3.1. Demolition (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.53	0.44	4.1	5.6	0.01	0.13	—	0.13	0.12	—	0.12	—	852	852	0.03	0.01	—	855
Demolition	—	—	—	—	—	—	0.05	0.05	—	0.01	0.01	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7

Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.11	0.15	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	23	23	< 0.005	< 0.005	—	23
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	3.9	3.9	< 0.005	< 0.005	—	3.9
Demolition	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.02
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.1	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	305	305	0.01	0.01	0.02	309
Vendor	0.05	0.01	0.49	0.30	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.02	354
Hauling	0.05	0.01	0.48	0.33	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	307	307	0.05	0.05	0.02	323
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.4	8.4	< 0.005	< 0.005	0.01	8.5
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.3	9.3	< 0.005	< 0.005	0.01	9.7
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.4	8.4	< 0.005	< 0.005	0.01	8.9

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.4	1.4	< 0.005	< 0.005	< 0.005	1.4
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.5	1.5	< 0.005	< 0.005	< 0.005	1.6
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.4	1.4	< 0.005	< 0.005	< 0.005	1.5

3.3. Site Preparation (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.52	0.44	3.7	5.5	0.01	0.19	—	0.19	0.17	—	0.17	—	858	858	0.03	0.01	—	861
Dust From Material Movement	—	—	—	—	—	—	0.21	0.21	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.02	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	4.7	4.7	< 0.005	< 0.005	—	4.7
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—

Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.02	0.02	< 0.005	< 0.005	< 0.005	0.02
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.78	0.78	< 0.005	< 0.005	—	0.78
Dust From Material Movement	—	—	—	—	—	—	< 0.005	< 0.005	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.1	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	305	305	0.01	0.01	0.02	309
Vendor	0.05	0.01	0.49	0.30	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.02	354
Hauling	0.05	0.01	0.48	0.33	< 0.005	< 0.005	0.07	0.08	< 0.005	0.02	0.02	—	307	307	0.05	0.05	0.02	323
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.01	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	1.7	1.7	< 0.005	< 0.005	< 0.005	1.7
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.9	1.9	< 0.005	< 0.005	< 0.005	1.9
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.7	1.7	< 0.005	< 0.005	< 0.005	1.8
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.28
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.32
Hauling	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.29

3.5. Grading (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	1.2	1.0	9.2	9.7	0.02	0.42	—	0.42	0.39	—	0.39	—	1,714	1,714	0.07	0.01	—	1,720
Dust From Material Movement	—	—	—	—	—	—	2.1	2.1	—	1.0	1.0	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.18	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33	33	< 0.005	< 0.005	—	33
Dust From Material Movement	—	—	—	—	—	—	0.04	0.04	—	0.02	0.02	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.07	0.07	< 0.005	< 0.005	< 0.005	0.07
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Road Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.4	5.4	< 0.005	< 0.005	—	5.5
Dust From Material Movement	—	—	—	—	—	—	0.01	0.01	—	< 0.005	< 0.005	—	—	—	—	—	—	—
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	0.01	0.01	< 0.005	< 0.005	< 0.005	0.01
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.1	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	305	305	0.01	0.01	0.02	309
Vendor	0.05	0.01	0.49	0.30	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.02	354
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	5.9	5.9	< 0.005	< 0.005	0.01	6.0
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	6.5	6.5	< 0.005	< 0.005	0.01	6.8
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	< 0.005	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	0.97	0.97	< 0.005	< 0.005	< 0.005	0.99
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.1	1.1	< 0.005	< 0.005	< 0.005	1.1
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.7. Building Construction Phase 1 (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	0.27	2.6	4.0	0.01	0.10	—	0.10	0.09	—	0.09	—	603	603	0.02	< 0.005	—	605
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.33	0.27	2.6	4.0	0.01	0.10	—	0.10	0.09	—	0.09	—	603	603	0.02	< 0.005	—	605
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.11	0.09	0.85	1.3	< 0.005	0.03	—	0.03	0.03	—	0.03	—	198	198	0.01	< 0.005	—	199
Onsite truck	< 0.005	< 0.005	0.01	< 0.005	< 0.005	< 0.005	0.21	0.21	< 0.005	0.02	0.02	—	1.2	1.2	< 0.005	< 0.005	< 0.005	1.2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.16	0.24	< 0.005	0.01	—	0.01	0.01	—	0.01	—	33	33	< 0.005	< 0.005	—	33
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.04	0.04	< 0.005	< 0.005	< 0.005	—	0.19	0.19	< 0.005	< 0.005	< 0.005	0.20
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.07	1.2	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	323	323	0.01	< 0.005	0.96	325
Vendor	0.05	0.01	0.46	0.29	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.80	355
Hauling	0.03	< 0.005	0.23	0.16	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	154	154	0.02	0.02	0.30	162
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.1	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	305	305	0.01	0.01	0.02	309
Vendor	0.05	0.01	0.49	0.30	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.02	354
Hauling	0.03	< 0.005	0.24	0.16	< 0.005	< 0.005	0.04	0.04	< 0.005	0.01	0.01	—	154	154	0.02	0.02	0.01	162
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.03	0.03	0.03	0.34	0.00	0.00	0.11	0.11	0.00	0.02	0.02	—	101	101	< 0.005	< 0.005	0.14	102
Vendor	0.02	< 0.005	0.16	0.10	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	111	111	0.01	0.02	0.11	117
Hauling	0.01	< 0.005	0.08	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	51	51	0.01	0.01	0.04	53
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.06	0.00	0.00	0.02	0.02	0.00	< 0.005	< 0.005	—	17	17	< 0.005	< 0.005	0.02	17
Vendor	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	18	18	< 0.005	< 0.005	0.02	19
Hauling	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	8.4	8.4	< 0.005	< 0.005	0.01	8.8

3.9. Building Construction Phase 3 (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	0.19	1.7	1.5	< 0.005	0.07	—	0.07	0.06	—	0.06	—	495	495	0.02	< 0.005	—	497
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.01	0.14	0.12	< 0.005	0.01	—	0.01	0.01	—	0.01	—	40	40	< 0.005	< 0.005	—	40
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.05	0.05	< 0.005	0.01	0.01	—	0.28	0.28	< 0.005	< 0.005	< 0.005	0.30
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.03	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	6.6	6.6	< 0.005	< 0.005	—	6.6
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.1	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	305	305	0.01	0.01	0.02	309
Vendor	0.02	< 0.005	0.16	0.10	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	113	113	0.01	0.02	0.01	118
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Worker	0.01	0.01	0.01	0.08	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	25	25	< 0.005	< 0.005	0.03	25
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.1	9.1	< 0.005	< 0.005	0.01	9.5
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	< 0.005	< 0.005	0.00	< 0.005	< 0.005	—	4.1	4.1	< 0.005	< 0.005	0.01	4.1
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.5	1.5	< 0.005	< 0.005	< 0.005	1.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.11. Building Construction Phase 3 (2027) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.22	0.18	1.6	1.5	< 0.005	0.07	—	0.07	0.06	—	0.06	—	495	495	0.02	< 0.005	—	497
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.6
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.02	0.02	0.15	0.14	< 0.005	0.01	—	0.01	0.01	—	0.01	—	45	45	< 0.005	< 0.005	—	45
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.06	0.06	< 0.005	0.01	0.01	—	0.31	0.31	< 0.005	< 0.005	< 0.005	0.33
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	7.4	7.4	< 0.005	< 0.005	—	7.4
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	0.05	0.05	< 0.005	< 0.005	< 0.005	0.05
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.09	0.09	0.07	1.0	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	299	299	0.01	< 0.005	0.02	300
Vendor	0.01	< 0.005	0.15	0.10	< 0.005	< 0.005	0.03	0.03	< 0.005	0.01	0.01	—	110	110	0.01	0.02	0.01	115
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.01	0.01	0.01	0.09	0.00	0.00	0.03	0.03	0.00	0.01	0.01	—	27	27	< 0.005	< 0.005	0.03	27
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.9	9.9	< 0.005	< 0.005	0.01	10
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.02	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	4.5	4.5	< 0.005	< 0.005	0.01	4.5
Vendor	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	1.6	1.6	< 0.005	< 0.005	< 0.005	1.7
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.13. Building Construction Phase 2 (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Off-Roa Equipment	0.12	0.10	0.91	1.2	< 0.005	0.04	—	0.04	0.04	—	0.04	—	183	183	0.01	< 0.005	—	184
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.12	0.10	0.91	1.2	< 0.005	0.04	—	0.04	0.04	—	0.04	—	183	183	0.01	< 0.005	—	184
Onsite truck	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	0.74	0.74	< 0.005	0.07	0.07	—	3.5	3.5	< 0.005	< 0.005	< 0.005	3.7
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	0.02	0.02	0.15	0.19	< 0.005	0.01	—	0.01	0.01	—	0.01	—	30	30	< 0.005	< 0.005	—	30
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.11	0.11	< 0.005	0.01	0.01	—	0.58	0.58	< 0.005	< 0.005	< 0.005	0.61
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Roa d Equipm ent	< 0.005	< 0.005	0.03	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	5.0	5.0	< 0.005	< 0.005	—	5.0
Onsite truck	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	0.02	0.02	< 0.005	< 0.005	< 0.005	—	0.10	0.10	< 0.005	< 0.005	< 0.005	0.10
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.07	1.2	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	323	323	0.01	< 0.005	0.96	325
Vendor	0.05	0.01	0.46	0.29	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.80	355
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.10	0.09	0.09	1.1	0.00	0.00	0.33	0.33	0.00	0.08	0.08	—	305	305	0.01	0.01	0.02	309
Vendor	0.05	0.01	0.49	0.30	< 0.005	< 0.005	0.09	0.09	< 0.005	0.02	0.03	—	339	339	0.03	0.05	0.02	354
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.02	0.01	0.01	0.17	0.00	0.00	0.05	0.05	0.00	0.01	0.01	—	50	50	< 0.005	< 0.005	0.07	51
Vendor	0.01	< 0.005	0.08	0.05	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	—	56	56	0.01	0.01	0.06	58
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	< 0.005	< 0.005	< 0.005	0.03	0.00	0.00	0.01	0.01	0.00	< 0.005	< 0.005	—	8.3	8.3	< 0.005	< 0.005	0.01	8.4
Vendor	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	9.2	9.2	< 0.005	< 0.005	0.01	9.6
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.15. Paving (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.66	0.55	4.7	5.6	0.01	0.20	—	0.20	0.18	—	0.18	—	884	884	0.04	0.01	—	887
Paving	0.08	0.08	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.01	0.01	0.06	0.08	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	12	12	< 0.005	< 0.005	—	12
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	2.0	2.0	< 0.005	< 0.005	—	2.0
Paving	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

3.17. Architectural Coating (2026) - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Location	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Onsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	0.15	0.12	0.86	1.1	< 0.005	0.02	—	0.02	0.02	—	0.02	—	134	134	0.01	< 0.005	—	134
Architectural Coatings	19	19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	0.01	0.02	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.8	1.8	< 0.005	< 0.005	—	1.8

Architectural Coating	0.26	0.26	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Off-Road Equipment	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.30	0.30	< 0.005	< 0.005	—	0.30
Architectural Coatings	0.05	0.05	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Onsite truck	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Offsite	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Worker	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Vendor	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Hauling	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

4. Operations Emissions Details

4.1. Mobile Emissions by Land Use

4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	2.5	2.3	1.2	14	0.03	0.02	3.3	3.3	0.02	0.83	0.85	—	3,533	3,533	0.17	0.14	9.3	3,588
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	2.5	2.3	1.2	14	0.03	0.02	3.3	3.3	0.02	0.83	0.85	—	3,533	3,533	0.17	0.14	9.3	3,588
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	2.4	2.3	1.4	15	0.03	0.02	3.3	3.3	0.02	0.83	0.85	—	3,383	3,383	0.20	0.15	0.24	3,435
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00
Total	2.4	2.3	1.4	15	0.03	0.02	3.3	3.3	0.02	0.83	0.85	—	3,383	3,383	0.20	0.15	0.24	3,435
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	0.33	0.31	0.18	2.0	< 0.005	< 0.005	0.45	0.46	< 0.005	0.11	0.12	—	435	435	0.02	0.02	0.52	442
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	0.00	0.00	0.00	0.00

Total	0.33	0.31	0.18	2.0	< 0.005	< 0.005	0.45	0.46	< 0.005	0.11	0.12	—	435	435	0.02	0.02	0.52	442

4.2. Energy

4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	—	22	22	< 0.005	< 0.005	—	22
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	3.2	3.2	< 0.005	< 0.005	—	3.3
Total	—	—	—	—	—	—	—	—	—	—	—	—	25	25	< 0.005	< 0.005	—	25
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	—	22	22	< 0.005	< 0.005	—	22
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	3.2	3.2	< 0.005	< 0.005	—	3.3
Total	—	—	—	—	—	—	—	—	—	—	—	—	25	25	< 0.005	< 0.005	—	25
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	—	3.6	3.6	< 0.005	< 0.005	—	3.7
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	—	0.53	0.53	< 0.005	< 0.005	—	0.54
Total	—	—	—	—	—	—	—	—	—	—	—	—	4.2	4.2	< 0.005	< 0.005	—	4.2

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	116	116	0.01	< 0.005	—	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	116	116	0.01	< 0.005	—	116
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	116	116	0.01	< 0.005	—	116
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	0.01	0.01	0.10	0.08	< 0.005	0.01	—	0.01	0.01	—	0.01	—	116	116	0.01	< 0.005	—	116
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	—	0.00	0.00	—	0.00	—	0.00	0.00	0.00	0.00	—	0.00
Total	< 0.005	< 0.005	0.02	0.01	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	19	19	< 0.005	< 0.005	—	19

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.19	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.07	0.06	< 0.005	0.38	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.6	1.6	< 0.005	< 0.005	—	1.6
Total	0.28	0.28	< 0.005	0.38	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	1.6	1.6	< 0.005	< 0.005	—	1.6
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.19	0.19	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	0.22	0.22	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Consumer Products	0.03	0.03	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural Coating	< 0.005	< 0.005	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	0.01	0.01	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.13	0.13	< 0.005	< 0.005	—	0.13
Total	0.05	0.04	< 0.005	0.03	< 0.005	< 0.005	—	< 0.005	< 0.005	—	< 0.005	—	0.13	0.13	< 0.005	< 0.005	—	0.13

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.01	0.01	< 0.005	< 0.005	—	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	1.7	3.3	5.0	0.18	< 0.005	—	11
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	0.29	0.55	0.83	0.03	< 0.005	—	1.8
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	< 0.005	< 0.005	< 0.005	< 0.005	—	< 0.005
Total	—	—	—	—	—	—	—	—	—	—	—	0.29	0.55	0.84	0.03	< 0.005	—	1.8

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52
Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	15	0.00	15	1.5	0.00	—	52
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	2.4	0.00	2.4	0.24	0.00	—	8.6

Parking Lot	—	—	—	—	—	—	—	—	—	—	—	0.00	0.00	0.00	0.00	0.00	—	0.00
Total	—	—	—	—	—	—	—	—	—	—	—	2.4	0.00	2.4	0.24	0.00	—	8.6

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.03	0.03
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Day-Care Center	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.01	0.01

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

5. Activity Data

5.1. Construction Schedule

Phase Name	Phase Type	Start Date	End Date	Days Per Week	Work Days per Phase	Phase Description
Demolition	Demolition	2/16/2026	3/2/2026	5.0	10.0	—

Site Preparation	Site Preparation	3/3/2026	3/4/2026	5.0	2.0	—
Grading	Grading	3/5/2026	3/13/2026	5.0	7.0	—
Building Construction Phase 1	Building Construction	3/14/2026	8/28/2026	5.0	120	—
Building Construction Phase 3	Building Construction	11/21/2026	2/15/2027	5.0	61	—
Building Construction Phase 2	Building Construction	8/29/2026	11/20/2026	5.0	60	—
Paving	Paving	7/27/2026	8/3/2026	5.0	5.0	—
Architectural Coating	Architectural Coating	8/4/2026	8/10/2026	5.0	5.0	—

5.2. Off-Road Equipment

5.2.1. Unmitigated

Phase Name	Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
Demolition	Tractors/Loaders/Backhoes	Diesel	Average	2.0	6.0	84	0.37
Demolition	Rubber Tired Dozers	Diesel	Average	1.00	1.00	367	0.40
Demolition	Concrete/Industrial Saws	Diesel	Average	1.00	8.0	33	0.73
Site Preparation	Graders	Diesel	Average	1.00	8.0	148	0.41
Site Preparation	Tractors/Loaders/Backhoes	Diesel	Average	1.00	8.0	84	0.37
Grading	Graders	Diesel	Average	1.00	6.0	148	0.41
Grading	Rubber Tired Dozers	Diesel	Average	1.00	6.0	367	0.40
Grading	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.0	84	0.37
Building Construction Phase 1	Forklifts	Diesel	Average	2.0	6.0	82	0.20
Building Construction Phase 1	Tractors/Loaders/Backhoes	Diesel	Average	2.0	4.0	84	0.37

Building Construction Phase 1	Dumpers/Tenders	Diesel	Average	1.00	4.0	16	0.38
Building Construction Phase 1	Excavators	Diesel	Average	1.00	3.0	36	0.38
Building Construction Phase 3	Cranes	Diesel	Average	1.00	4.0	367	0.29
Building Construction Phase 2	Forklifts	Diesel	Average	2.0	4.0	82	0.20
Building Construction Phase 2	Dumpers/Tenders	Diesel	Average	1.00	4.0	16	0.38
Paving	Tractors/Loaders/Backhoes	Diesel	Average	1.00	7.0	84	0.37
Paving	Cement and Mortar Mixers	Diesel	Average	4.0	6.0	10.0	0.56
Paving	Pavers	Diesel	Average	1.00	7.0	81	0.42
Paving	Rollers	Diesel	Average	1.00	7.0	36	0.38
Paving	Pumps	Diesel	Average	1.00	6.0	11	0.74
Architectural Coating	Air Compressors	Diesel	Average	1.00	6.0	37	0.48

5.3. Construction Vehicles

5.3.1. Unmitigated

Phase Name	Trip Type	One-Way Trips per Day	Miles per Trip	Vehicle Mix
Demolition	Worker	40	12	LDA,LDT1,LDT2
Demolition	Vendor	12	8.4	HHDT,MHDT
Demolition	Hauling	4.0	20	HHDT
Demolition	Onsite truck	1.00	0.50	HHDT
Site Preparation	Worker	40	12	LDA,LDT1,LDT2
Site Preparation	Vendor	12	8.4	HHDT,MHDT
Site Preparation	Hauling	4.0	20	HHDT
Site Preparation	Onsite truck	1.00	0.50	HHDT

Grading	Worker	40	12	LDA,LDT1,LDT2
Grading	Vendor	12	8.4	HHDT,MHDT
Grading	Hauling	0.00	20	HHDT
Grading	Onsite truck	1.00	0.50	HHDT
Building Construction Phase 1	Worker	40	12	LDA,LDT1,LDT2
Building Construction Phase 1	Vendor	12	8.4	HHDT,MHDT
Building Construction Phase 1	Hauling	2.0	20	HHDT
Building Construction Phase 1	Onsite truck	1.00	0.50	HHDT
Building Construction Phase 3	Worker	40	12	LDA,LDT1,LDT2
Building Construction Phase 3	Vendor	4.0	8.4	HHDT,MHDT
Building Construction Phase 3	Hauling	0.00	20	HHDT
Building Construction Phase 3	Onsite truck	1.00	0.50	HHDT
Building Construction Phase 2	Worker	40	12	LDA,LDT1,LDT2
Building Construction Phase 2	Vendor	12	8.4	HHDT,MHDT
Building Construction Phase 2	Hauling	0.00	20	HHDT
Building Construction Phase 2	Onsite truck	1.00	0.50	HHDT
Paving	Worker	0.00	12	LDA,LDT1,LDT2
Paving	Vendor	0.00	8.4	HHDT,MHDT
Paving	Hauling	0.00	20	HHDT
Paving	Onsite truck	0.00	0.00	HHDT
Architectural Coating	Worker	0.00	12	LDA,LDT1,LDT2
Architectural Coating	Vendor	0.00	8.4	HHDT,MHDT
Architectural Coating	Hauling	0.00	20	HHDT
Architectural Coating	Onsite truck	0.00	0.00	HHDT

5.4. Vehicles

5.4.1. Construction Vehicle Control Strategies

Non-applicable. No control strategies activated by user.

5.5. Architectural Coatings

Phase Name	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
Architectural Coating	0.00	0.00	13,235	4,412	396

5.6. Dust Mitigation

5.6.1. Construction Earthmoving Activities

Phase Name	Material Imported (Cubic Yards)	Material Exported (Cubic Yards)	Acres Graded (acres)	Material Demolished (Building Square Footage)	Acres Paved (acres)
Demolition	0.00	0.00	0.00	700	0.00
Site Preparation	0.00	0.00	0.50	0.00	0.00
Grading	0.00	0.00	1.5	0.00	0.00
Paving	0.00	0.00	0.00	0.00	0.15

5.6.2. Construction Earthmoving Control Strategies

Control Strategies Applied	Frequency (per day)	PM10 Reduction	PM2.5 Reduction
Water Exposed Area	2	61%	61%
Water Demolished Area	2	36%	36%

5.7. Construction Paving

Phase Name	Land Use	Area Paved (acres)	% Asphalt
Paving	Day-Care Center	0.00	0%
Paving	Parking Lot	0.15	100%

5.8. Construction Electricity Consumption and Emissions Factors

kWh per Year and Emission Factor (lb/MWh)

Year	kWh per Year	CO2	CH4	N2O
2026	0.00	204	0.03	< 0.005
2027	0.00	204	0.03	< 0.005

5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Day-Care Center	1,005	131	123	275,230	4,668	1,052	987	1,323,234
Parking Lot	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

5.10. Operational Area Sources

5.10.1. Hearths

Land Use	Hearth Type	Unmitigated (number)	Mitigated (number)
Day-Care Center	Wood Fireplaces	0	0
Day-Care Center	Gas Fireplaces	0	0
Day-Care Center	Propane Fireplaces	0	0
Day-Care Center	Electric Fireplaces	0	0
Day-Care Center	No Fireplaces	0	0
Day-Care Center	Conventional Wood Stoves	0	0
Day-Care Center	Catalytic Wood Stoves	0	0
Day-Care Center	Non-Catalytic Wood Stoves	0	0
Day-Care Center	Pellet Wood Stoves	0	0
Parking Lot	Wood Fireplaces	0	0
Parking Lot	Gas Fireplaces	0	0
Parking Lot	Propane Fireplaces	0	0
Parking Lot	Electric Fireplaces	0	0

Parking Lot	No Fireplaces	0	0
Parking Lot	Conventional Wood Stoves	0	0
Parking Lot	Catalytic Wood Stoves	0	0
Parking Lot	Non-Catalytic Wood Stoves	0	0
Parking Lot	Pellet Wood Stoves	0	0

5.10.2. Architectural Coatings

—	Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
undefined	0.00	0.00	13,235	4,412	396

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Day-Care Center	39,151	204	0.0330	0.0040	362,280
Parking Lot	5,782	204	0.0330	0.0040	0.00

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)

Day-Care Center	904,970	11,606
Parking Lot	0.00	2,487

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Day-Care Center	27	0.00
Parking Lot	0.00	0.00

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Day-Care Center	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Day-Care Center	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.0	4.0	18
Day-Care Center	Stand-alone retail refrigerators and freezers	R-134a	1,430	< 0.005	1.00	0.00	1.00
Day-Care Center	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.5	7.5	20

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)

6. Climate Risk Detailed Report

6.1. Climate Risk Summary

Cal-Adapt midcentury 2040–2059 average projections for four hazards are reported below for your project location. These are under Representation Concentration Pathway (RCP) 8.5 which assumes GHG emissions will continue to rise strongly through 2050 and then plateau around 2100.

Climate Hazard	Result for Project Location	Unit
Temperature and Extreme Heat	6.1	annual days of extreme heat

Extreme Precipitation	10	annual days with precipitation above 20 mm
Sea Level Rise	—	meters of inundation depth
Wildfire	23	annual hectares burned

Temperature and Extreme Heat data are for grid cell in which your project are located. The projection is based on the 98th historical percentile of daily maximum/minimum temperatures from observed historical data (32 climate model ensemble from Cal-Adapt, 2040–2059 average under RCP 8.5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Extreme Precipitation data are for the grid cell in which your project are located. The threshold of 20 mm is equivalent to about ¾ an inch of rain, which would be light to moderate rainfall if received over a full day or heavy rain if received over a period of 2 to 4 hours. Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.
Sea Level Rise data are for the grid cell in which your project are located. The projections are from Radke et al. (2017), as reported in Cal-Adapt (Radke et al., 2017, CEC-500-2017-008), and consider inundation location and depth for the San Francisco Bay, the Sacramento-San Joaquin River Delta and California coast resulting different increments of sea level rise coupled with extreme storm events. Users may select from four scenarios to view the range in potential inundation depth for the grid cell. The four scenarios are: No rise, 0.5 meter, 1.0 meter, 1.41 meters
Wildfire data are for the grid cell in which your project are located. The projections are from UC Davis, as reported in Cal-Adapt (2040–2059 average under RCP 8.5), and consider historical data of climate, vegetation, population density, and large (> 400 ha) fire history. Users may select from four model simulations to view the range in potential wildfire probabilities for the grid cell. The four simulations make different assumptions about expected rainfall and temperature are: Warmer/drier (HadGEM2-ES), Cooler/wetter (CNRM-CM5), Average conditions (CanESM2), Range of different rainfall and temperature possibilities (MIROC5). Each grid cell is 6 kilometers (km) by 6 km, or 3.7 miles (mi) by 3.7 mi.

6.2. Initial Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score
Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	3	0	0	N/A
Sea Level Rise	1	0	0	N/A
Wildfire	1	0	0	N/A
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	0	0	0	N/A

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores do not include implementation of climate risk reduction measures.

6.3. Adjusted Climate Risk Scores

Climate Hazard	Exposure Score	Sensitivity Score	Adaptive Capacity Score	Vulnerability Score

Temperature and Extreme Heat	N/A	N/A	N/A	N/A
Extreme Precipitation	3	1	1	3
Sea Level Rise	1	1	1	2
Wildfire	1	1	1	2
Flooding	N/A	N/A	N/A	N/A
Drought	N/A	N/A	N/A	N/A
Snowpack Reduction	N/A	N/A	N/A	N/A
Air Quality Degradation	1	1	1	2

The sensitivity score reflects the extent to which a project would be adversely affected by exposure to a climate hazard. Exposure is rated on a scale of 1 to 5, with a score of 5 representing the greatest exposure.
The adaptive capacity of a project refers to its ability to manage and reduce vulnerabilities from projected climate hazards. Adaptive capacity is rated on a scale of 1 to 5, with a score of 5 representing the greatest ability to adapt.
The overall vulnerability scores are calculated based on the potential impacts and adaptive capacity assessments for each hazard. Scores include implementation of climate risk reduction measures.

6.4. Climate Risk Reduction Measures

7. Health and Equity Details

7.1. CalEnviroScreen 4.0 Scores

The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Exposure Indicators	—
AQ-Ozone	11
AQ-PM	22
AQ-DPM	46
Drinking Water	6.9
Lead Risk Housing	33
Pesticides	0.00
Toxic Releases	31
Traffic	64

Effect Indicators	—
CleanUp Sites	58
Groundwater	47
Haz Waste Facilities/Generators	0.00
Impaired Water Bodies	0.00
Solid Waste	0.00
Sensitive Population	—
Asthma	28
Cardio-vascular	7.1
Low Birth Weights	84
Socioeconomic Factor Indicators	—
Education	52
Housing	28
Linguistic	71
Poverty	15
Unemployment	9.7

7.2. Healthy Places Index Scores

The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

Indicator	Result for Project Census Tract
Economic	—
Above Poverty	77.64660593
Employed	93.31451302
Median HI	79.34043372
Education	—
Bachelor's or higher	71.35891184
High school enrollment	100
Preschool enrollment	66.7393815

Transportation	—
Auto Access	49.51879892
Active commuting	80.35416399
Social	—
2-parent households	48.0816117
Voting	50.9816502
Neighborhood	—
Alcohol availability	30.64288464
Park access	81.35506224
Retail density	65.78981137
Supermarket access	94.25125112
Tree canopy	81.71435904
Housing	—
Homeownership	68.57436161
Housing habitability	50.08340819
Low-inc homeowner severe housing cost burden	49.31348646
Low-inc renter severe housing cost burden	46.42627999
Uncrowded housing	44.45014757
Health Outcomes	—
Insured adults	94.43089953
Arthritis	0.0
Asthma ER Admissions	64.0
High Blood Pressure	0.0
Cancer (excluding skin)	0.0
Asthma	0.0
Coronary Heart Disease	0.0
Chronic Obstructive Pulmonary Disease	0.0
Diagnosed Diabetes	0.0

Life Expectancy at Birth	84.6
Cognitively Disabled	76.7
Physically Disabled	62.2
Heart Attack ER Admissions	88.5
Mental Health Not Good	0.0
Chronic Kidney Disease	0.0
Obesity	0.0
Pedestrian Injuries	67.9
Physical Health Not Good	0.0
Stroke	0.0
Health Risk Behaviors	—
Binge Drinking	0.0
Current Smoker	0.0
No Leisure Time for Physical Activity	0.0
Climate Change Exposures	—
Wildfire Risk	0.0
SLR Inundation Area	0.0
Children	68.4
Elderly	43.3
English Speaking	16.7
Foreign-born	88.0
Outdoor Workers	80.6
Climate Change Adaptive Capacity	—
Impervious Surface Cover	56.5
Traffic Density	61.4
Traffic Access	87.4
Other Indices	—
Hardship	25.1

Other Decision Support	—
2016 Voting	54.1

7.3. Overall Health & Equity Scores

Metric	Result for Project Census Tract
CalEnviroScreen 4.0 Score for Project Location (a)	17
Healthy Places Index Score for Project Location (b)	84
Project Located in a Designated Disadvantaged Community (Senate Bill 535)	No
Project Located in a Low-Income Community (Assembly Bill 1550)	No
Project Located in a Community Air Protection Program Community (Assembly Bill 617)	No

a: The maximum CalEnviroScreen score is 100. A high score (i.e., greater than 50) reflects a higher pollution burden compared to other census tracts in the state.
b: The maximum Health Places Index score is 100. A high score (i.e., greater than 50) reflects healthier community conditions compared to other census tracts in the state.

7.4. Health & Equity Measures

No Health & Equity Measures selected.

7.5. Evaluation Scorecard

Health & Equity Evaluation Scorecard not completed.

7.6. Health & Equity Custom Measures

No Health & Equity Custom Measures created.

8. User Changes to Default Data

8.1. Justifications

Screen	Justification
Land Use	Construction occurring on a 0.48 acre parcel
Construction: Construction Phases	12 month construction duration
Construction: Off-Road Equipment	Anticipated Equipment
Construction: Dust From Material Movement	no cut and fill

Construction: Trips and VMT	Anticipated workers and deliveries/hauls

APPENDIX B

Health Risk Assessment

Air Quality Health Risk Assessment for the Westborough Preschool Expansion Project

MEMORANDUM

Date: December 11, 2025 **Job No.:** 25218-00

To: Erin Wielenga, Air Quality Specialist, SWCA Environmental Consultants

From: Yilin Tian, Project Environmental Engineer, Baseline Environmental Consulting

Subject: **Air Quality Health Risk Assessment for the Westborough Preschool Expansion Project**

The Westborough Preschool Expansion Project (project) proposes to demolish the existing structures and construct new preschool facilities at Westborough Park at 2350 Galway Drive in South San Francisco, California (site). The new preschool facilities would include a new building with five indoor classrooms, one covered outdoor classroom, and administrative office space.

This technical memorandum evaluates the potential health risk impacts to nearby sensitive receptors exposed to diesel particulate matter (DPM) and fine particulate matter ($PM_{2.5}$) emissions from project construction. The health risks to nearby sensitive receptors were evaluated in accordance with guidance from the Office of Environmental Health Hazard Assessment (OEHHA)[1] and the Bay Area Air District (BAAD).[2] This study will be used to support environmental review of the project under the California Environmental Quality Act (CEQA).

PROJECT ANALYSIS

During construction, the project would generate emissions of DPM and $PM_{2.5}$ from the exhaust of diesel-powered engines; these emissions are a complex mixture of soot, ash particulates, metallic abrasion particles, volatile organic compounds, and other components that can penetrate deeply into the lungs and contribute to a range of health problems. In 1998, the California Air Resources Board (CARB) identified DPM from diesel-powered engines as a toxic air contaminant (TAC) based on its potential to cause cancer and other adverse health effects.[3] BAAD also recommends that construction emissions of $PM_{2.5}$, in addition to TACs, be considered in health risk assessments of air pollution due to its correlation with diesel exhaust and strong evidence for adverse health effects.

[1] Office of Environmental Health Hazard Assessment (OEHHA), 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, May.
[2] Bay Area Air District (BAAD), 2023. CEQA Air Quality Guidelines. April.
[3] California Air Resources Board (CARB), 1998. Initial Statement of Reasons for Rulemaking; Proposed Identification of Diesel Exhaust as a Toxic Air Contaminant, June.

Health Risk Screening Thresholds

For risk assessment purposes, exposure to TACs may result in cancer and non-cancer health impacts. Cancer risk is expressed as the incremental probability that an individual will develop cancer over a lifetime as a direct result of exposures to potential carcinogens from anthropogenic sources. The estimated cancer risk is a unitless probability, often expressed as chances in a million. A hazard index (HI) is used to assess non-cancer health impacts for different exposure scenarios (chronic and acute). The HI is based on the ratio of the potential exposures to a chemical by the levels at which no adverse effects are expected.

The project site is located in the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of BAAD. BAAD has adopted thresholds of significance to assist lead agencies in the evaluation and mitigation of air quality impacts under CEQA.[4] BAAD's recommend health risk thresholds are summarized in **Table 1**.

Table 1: BAAD Health Risk Screening Thresholds

Impact Analysis	Pollutant	Screening Thresholds
Local Community Risks and Hazards (Operation and/or Construction)	$PM_{2.5}$ (project)	0.3 µg/m^3 (annual average)
	TACs (project)	Cancer risk increase > 10 in one million Chronic hazard index > 1.0
	$PM_{2.5}$ (cumulative)	0.8 µg/m^3 (annual average)
	TACs (cumulative)	Cancer risk > 100 in one million Chronic hazard index > 10.0

Notes: TACs = Toxic air contaminants; $PM_{2.5}$ = Fine particulate matter; µg/m^3 = micrograms per cubic meter.
Source: BAAD, 2023. CEQA Air Quality Guidelines. April.

Sensitive Receptors

Sensitive receptors are areas where individuals are more susceptible to the adverse effects of poor air quality. Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, parks, elderly housing, and convalescent facilities. Residential areas are also considered sensitive receptors because people are often at home for extended periods, thereby increasing the duration of exposure to potential air contaminants. Existing sensitive receptors near the project site include single-family residences adjacent to the north, east, and south of the project site. The Westborough Middle School is located about 1,145 feet to the west of the project site.

BAAD also recommends evaluating health risks to offsite worker receptors, which are not considered sensitive receptors. Since the offsite workers are located further away than the sensitive land uses surrounding the project site, and residential and school receptors have a

[4] Bay Area Air District (BAAD), 2023. CEQA Air Quality Guidelines. April.

longer exposure duration, larger age sensitivity factor, and/or higher exposure frequency than workers, the offsite worker receptors are not evaluated in this analysis.

DPM and $PM_{2.5}$ Emissions from Construction

Project construction would generate DPM and $PM_{2.5}$ emissions from the exhaust of off-road diesel construction equipment, and fugitive $PM_{2.5}$ emissions from construction activities. BAAD recommends using the most recent version of the California Emissions Estimator Model (CalEEMod Version 2022.1) to estimate air pollutant emissions from construction of a project. CalEEMod uses widely accepted models for emission estimates combined with appropriate default data for a variety of land use projects that can be used if site-specific information is not available. The project's emissions of criteria air pollutants during construction were evaluated in the *Air Quality Technical Report for the Westborough Preschool Expansion Project* dated December 2025 (Air Quality Report).[5] The primary input data used to estimate emissions associated with construction of the project were generally based on CalEEMod defaults for the Day-Care Center land use type and project-specific information. Construction of the project is expected to commence in February 2026 and end in March 2027, lasting for approximately 12 months. A copy of the CalEEMod report is included as Attachment A of the Air Quality Report.

Health Risk Assessment

Exposure to DPM and $PM_{2.5}$ Emissions during Construction

In accordance with guidance from BAAD and OEHHA, an assessment was conducted to evaluate potential health risks to sensitive receptors exposed to DPM and $PM_{2.5}$ emissions during project construction. The acute HI for DPM was not calculated because an acute reference exposure level has not been approved by OEHHA and CARB, and BAAD does not recommend analysis of acute non-cancer health hazards from construction activity.

The annual average concentrations of DPM and $PM_{2.5}$ during construction were estimated within 1,000 feet of the project site using the U.S. Environmental Protection Agency's AERMOD air dispersion model. For this analysis, emissions of exhaust coarse particulate matter (PM_{10}) were used as a surrogate for DPM, which is a conservative assumption because more than 90 percent of DPM is less than 1 micron in diameter. For modeling purposes, daily emissions from construction were assumed to occur between 8 a.m. and 5 p.m. Monday through Friday. The exhaust and fugitive dust emissions from off-road equipment were represented in the AERMOD model as area sources encompassing the proposed new preschool building footprints. The exhaust and fugitive dust emission rates for off-road equipment were modeled using a unit emission rate of 1 gram per second, and then the model concentrations were scaled by the actual emission rates based on the total mass of emissions averaged over the entire duration of

[5] SWCA Environmental Consultants, 2025. Air Quality Technical Report for the Westborough Preschool Expansion Project. December.

construction. During non-work hours, the emission rates were assumed to be zero. The input parameters and assumptions used for estimating the dispersion of DPM and $PM_{2.5}$ from off-road diesel construction equipment are included in **Attachment A**.

A uniform grid of receptors spaced 20 meters apart was created for ground level receptors at a standard breathing height of 1.5 meters to develop isopleths (i.e., concentration contours) around the project site that illustrate the air dispersion pattern from the emissions sources. In addition, discrete receptors were created for ground level receptors at heights of 1.5 meters to calculate concentrations at the maximally exposed individual resident (MEIR) and the onsite maximally exposed individual student (Onsite MEIS). The AERMOD model input parameters included 1 year of BAAD meteorological data from the San Francisco International Airport Automated Surface Observing Systems (ASOS) Met Site (KSFO) located about 5.4 miles to the southeast of the project site.

The air dispersion model was used to estimate annual average concentrations of DPM and $PM_{2.5}$ from project construction emissions at nearby receptors. Based on the results of the air dispersion model (**Attachment A**), potential health risks were evaluated for the following receptors (**Figure 1**):

- The MEIR on the ground floor of a single-family residence located to the east of the project site across Galway Drive; and
- The Onsite MEIS at the existing Alice Peña Bulos Community Center (community center) at 2380 Galway Drive. The community center would continue to function as a preschool until construction of the project is complete.

For the MEIR, the incremental increase in cancer risk was conservatively assessed for an infant starting from birth that would be exposed to annual average DPM concentrations over the entire duration of project construction (12 months). This exposure scenario represents the most sensitive individual who could be exposed to adverse air quality conditions in the vicinity of the project site. For the Onsite MEIS, it was conservatively assumed that the preschool would be in session and a student 2 years of age would attend the preschool during the entire project construction duration.

Estimates of the health risks at the MEIR and Onsite MEIS from exposure to DPM and $PM_{2.5}$ concentrations during project construction are summarized and compared to the BAAD's thresholds of significance in **Table 2**. At the MEIR and the Onsite MEIS, the estimated excess cancer risks and chronic HIs for DPM and annual average $PM_{2.5}$ concentrations from uncontrolled construction emissions were below the thresholds of significance. Therefore, construction of the project would not expose existing sensitive receptors to substantial concentrations of TACs and $PM_{2.5}$ from project construction.

Table 2: Health Risks during Project Construction

Emissions Scenario	Receptor	Diesel Particulate Matter		$PM_{2.5}$ Annual Average Concentration (µg/m³)
		Cancer Risk (per million)	Chronic Hazard Index	
Uncontrolled Off-Road Construction Equipment	MEIR	7.1	0.01	0.06
	Onsite MEIS	1.0	<0.01	0.02
Thresholds of Significance		**10**	**1.0**	**0.3**
Exceed Threshold?		**No**	**No**	**No**

Notes: µg/m³ = micrograms per cubic meter
Source: Attachment A

Cumulative Exposure to TACs and $PM_{2.5}$ Emissions

In addition to a project's individual DPM and $PM_{2.5}$ emissions during construction, the potential cumulative health risks to sensitive receptors from existing TACs and $PM_{2.5}$ were evaluated. Cumulative health risks were estimated at the MEIR to represent the worst-case-exposure scenario for sensitive receptors in the project vicinity.

Based on the BAAD's permitted stationary source risk map,[6] there is one existing stationary source within 1,000 feet of the MEIR (**Figure 1**): ARCO Facility #83129 (112119-1). However, BAAD's permitted stationary source inventory does not provide cancer risk or chronic HI estimates for this facility. Cancer risks associated with most retail gas stations are typically less than 10 in a million.[7] To provide a conservative analysis, the cancer risk and chronic HI for this facility were each assumed to be 10 in a million and 1.0, respectively. Preliminary health risk screening values at the MEIR associated with the stationary source were determined using this assumption and the BAAD Health Risk Calculator with Distance Multipliers (Beta Version 5.0). At the time of preparation of this analysis, there were no reasonably foreseeable future projects identified within 1,000 feet of the project that would introduce a new source of TACs and/or $PM_{2.5}$ emissions.

Preliminary health risk screening values at the MEIR from exposure to mobile sources of TACs and $PM_{2.5}$ were estimated based on the BAAD's Mobile Source Screening Map,[8] which provides

[6] Bay Area Air District (BAAD), 2024. Stationary Source Screening Map. Available at: https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=845658c19eae4594b9f4b805fb9d89a3.
[7] South Coast Air Quality Management District, 2025. Rules & Compliance – Retail Gasoline Dispensing Facilities. Available at: https://www.aqmd.gov/home/rules-compliance/compliance/toxic-hot-spots-ab-2588/iws-facilities/iws-gas-station#:~:text=The%20risk%20assessment%20for%20retail%20gas%20stations,assessment%20are%20conservative%20and%20may%20overestimate%20risks.
[8] Bay Area Air District (BAAD), 2024. Bay Area Air Quality Management District Mobile Source Screening Map, Beta Version. Available at: https://mtc.maps.arcgis.com/apps/instant/sidebar/index.html?appid=c5f9b1a40326409a89076bdc0d95e429.

health risk estimates reflective of 2022 conditions for residents living near major roadways, and reflective of 2024 conditions for residents living near rail lines and rail yards.

Estimates of the cumulative health risks at the MEIR for the project are summarized and compared to the BAAD's cumulative thresholds of significance in **Table 3**. As shown in **Table 3**, the cumulative cancer risk, chronic HI, and annual average $PM_{2.5}$ concentration at the MEIR were below the BAAD's cumulative thresholds. Therefore, implementation of the project would not expose existing sensitive receptors to substantial concentrations of TACs and $PM_{2.5}$ that would be considered cumulatively considerable.

Table 3: Cumulative Health Risks

Source	Source Type	Ref	Toxic Air Contaminants		$PM_{2.5}$ Annual Average Concentration ($\mu g/m^3$)
			Cancer Risk (per million)	Chronic Hazard Index	
Project					
Off-Road Construction Equipment	Diesel Exhaust		7.1	0.01	0.06
Existing Stationary Sources					
ARCO Facility #83129 (112119-1)[1]	Gasoline Station	1	1.8	0.18	0.00
Existing Mobile Sources					
Major Roadway	Mobile	2	2.9	0.02	0.14
Cumulative Health Risks			11.8	0.2	0.2
Thresholds of Significance			**100**	**10.0**	**0.8**
Exceed Threshold?			**No**	**No**	**No**

Notes: $\mu g/m^3$=micrograms per cubic meter; HI=hazard index; Ref=reference
Health risk screening values derived using the following BAAD tool and methodology references:
1) BAAD's Health Risk Calculator (Beta Version 5.0): General Multiplier Tool.
2) BAAD Beta version Mobile Source Screening Map for Roadway, Rail, and Railyard.
1 BAAD's permitted stationary source inventory does not provide cancer risk or chronic HI estimates for this facility. To provide a conservative analysis, the cancer risk and chronic HI for this facility were each assumed to be 10 in a million and 1.0, respectively.
Source: Attachment A

CONCLUSION

Based on the analysis of the potential health risk impacts related to emissions from off-road construction equipment, the project would not result in a substantial increase in the exposure of sensitive receptors to DPM and $PM_{2.5}$.

FIGURE

Legend

- MEIR
- MEIW
- Project Boundary
- 1,000-Feet Buffer around MEIR
- Existing Stationary Source

N

0 400 Feet

Figure 1
Sensitive Receptors and Cumulative Sources of TACs

BASELINE ENVIRONMENTAL CONSULTING

ATTACHMENT A

Health Risk Assessment Results

Summary of AERMOD Model Parameters, Assumptions, and Results for DPM and $PM_{2.5}$ Emissions from Construction

AERMOD Model Parameters and Assumptions			
Source Type	**Units**	**Value**	**Notes**
Volume Source: Off-Road Equipment Exhaust (DPM)			
Average Hours/Work Day	hours/day	9.0	Assumed Monday to Friday: 8 am to 5 pm
DPM Emission Rate	gram/second	0.00138	Exhaust PM10 from off-road construction equipment. Scaling factor used to convert result from AERMOD (Assumed 1 gram/second emission rate in the AERMOD model)
Release Height	meters	5.0	SMAQMD, 2015
Initial Vertical Dimension	meters	1.4	U.S. EPA, 2022
Area Source: On-Site Fugitive PM2.5			
Fugitive PM2.5 Emission Rate	gram/second	0.000399	Fugitive PM2.5 from on-site construction activities. Scaling factor used to convert result from AERMOD (Assumed 1 gram/second emission rate in the AERMOD model)
Release Height	meters	0.0	SMAQMD, 2015
Initial Vertical Dimension	meters	1.0	SMAQMD, 2015

AERMOD Model Results				
Sensitive Receptor	**Pollutant**	**Annual Average Concentration (unit emission rate)**	**Annual Average Concentration (actual emission rate)**	**Notes**
MEIR	DPM ($\mu g/m^3$)	31.23	0.04	DPM: exhaust only $PM_{2.5}$: exhaust and fugitive $PM_{2.5}$
	$PM_{2.5}$ ($\mu g/m^3$)	50.82	0.06	
Onsite MEIS	DPM ($\mu g/m^3$)	11.72	0.016	
	$PM_{2.5}$ ($\mu g/m^3$)	14.79	0.02	

Notes:

DPM = diesel particulate matter

PM_{10} = particulate matter with aerodynamic resistance diameters equal to or less than 10 microns

$PM_{2.5}$ = particulate matter with aerodynamic resistance diameters equal to or less than 2.5 microns

$\mu g/m^3$ = micrograms per cubic meter

Sacramento Metropolitan Air Quality Management District (SMAQMD), 2015. *Guide to Air Quality Assessment in Sacramento County* . June.
U.S. Environmental Protection Agency (EPA), 2022. U*ser's Guide for the AMS/EPA Regulatory Model (AERMOD)* .

Summary of Health Risk Assessment for DPM Emissions during Construction

Health Risk Assessment Parameters and Results				
Inhalation Cancer Risk Assessment for DPM	**Units**	**0-2 Years Old Infant (MEIR)**	**2-16 Years Old Student (Onsite MEIS)**	**Notes**
DPM Concentration (C)	$\mu g/m^3$	0.043	0.016	AERMOD Annual Average
Daily Breathing Rate (DBR)	L/kg-day	1090	520	BAAD, 2023
Inhalation absorption factor (A)	unitless	1.0	1.0	OEHHA, 2015
Exposure Frequency (EF)	unitless	0.96	0.68	MEIR: 350 days/365 days; Onsite MEIS: 250 days/365 days in a year (OEHHA, 2015)
Dose Conversion Factor (CF_D)	$mg\text{-}m^3/\mu g\text{-}L$	0.000001	0.000001	Conversion of µg to mg and L to m^3
Dose (D)	mg/kg/day	0.000045	0.000006	$C*DBR*A*EF*CF_D$ (OEHHA, 2015)
Cancer Potency Factor (CPF)	$(mg/kg/day)^{-1}$	1.1	1.1	Inhalation CPF for Diesel exhaust, OEHHA, 2015
Age Sensitivity Factor (ASF)	unitless	10	3	OEHHA, 2015
Annual Exposure Duration (ED)	years	1.0	1.0	12 months of construction
Averaging Time (AT)	years	70	70	70 years for residents (OEHHA, 2015)
Fraction of time at home (FAH)	unitless	1	--	OEHHA, 2015
Worker Adjustment Factor (WAF)	unitless	--	3.73	Assumes the average emissions occur 9 hours/day, 5 days per week
Cancer Risk Conversion Factor (CF)	m^3/L	1000000	1000000	Chances per million (OEHHA, 2015)
Cancer Risk	per million	7.1	1.0	MEIR: D*CPF*ASF*ED/AT*FAH*CF*IF MEIS: D*CPF*ASF*ED/AT*WAF*CF*IF
Hazard Index for DPM	**Units**	**MEIR**	**Onsite MEIS**	**Notes**
Chronic REL	$\mu g/m^3$	5.0	5.0	OEHHA, 2015
Chronic Hazard Index for DPM	unitless	0.009	0.003	HI=C/REL (OEHHA, 2015)

Notes:

DPM = diesel particulate matter

REL = reference exposure level

$\mu g/m^3$ = micrograms per cubic meter

L/kg-day = liters per kilogram-day

m^3/L = cubic meters per liter

$(mg/kg/day)^{-1}$ = 1/milligrams per kilograms per day

MEIR = maximum exposed individual resident

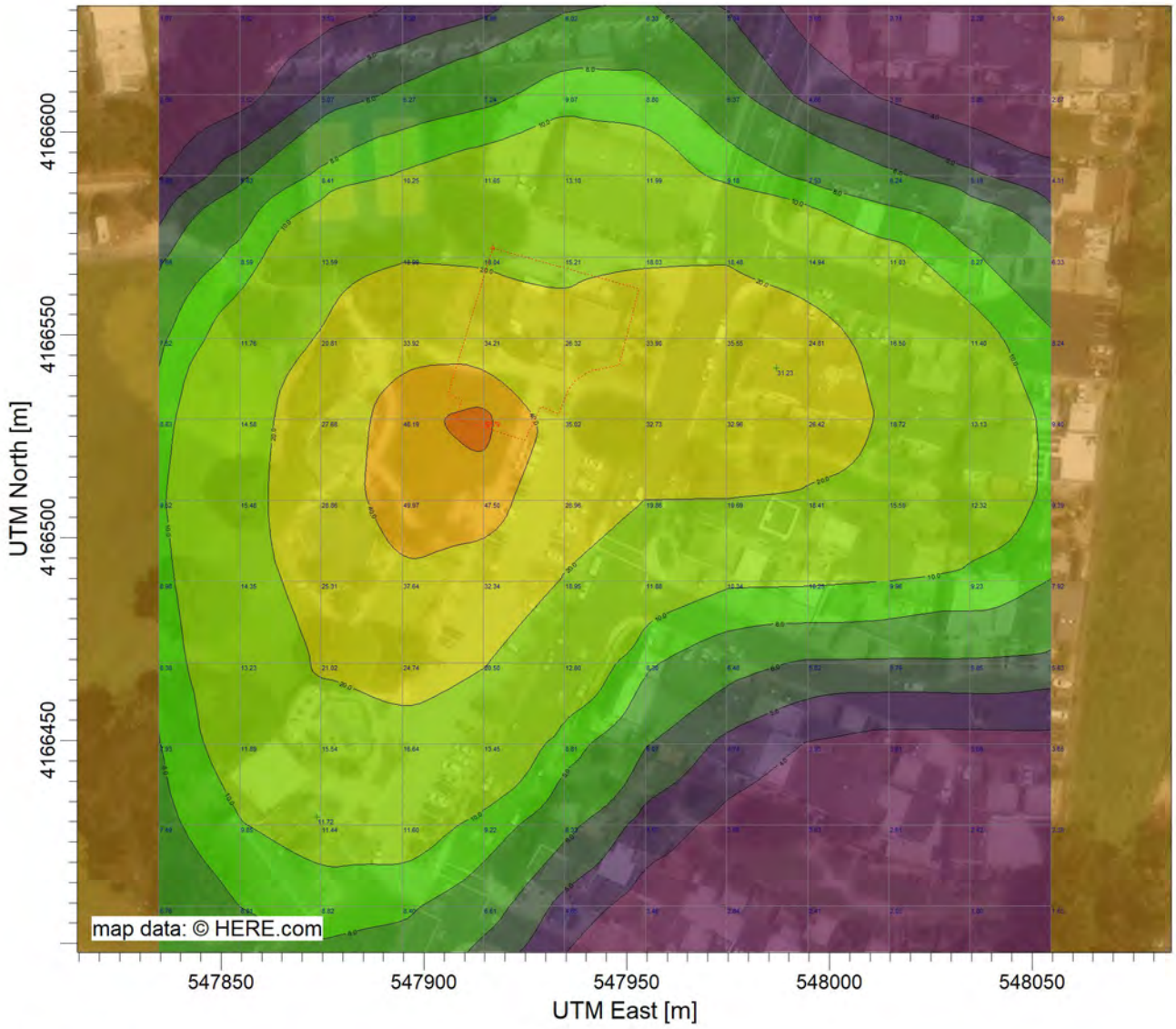
MEIW = maximum exposed individual worker

Bay Area Air District (BAAD), 2023. *CEQA Air Quality Guidelines.* May.

Office of Environmental Health Hazard Assessment (OEHHA), 2015. *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. February.*

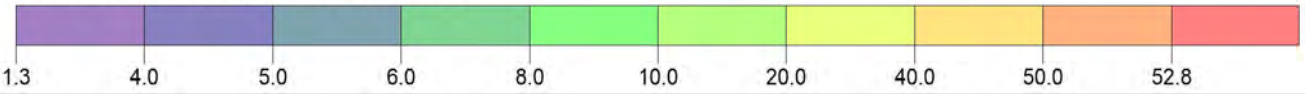
PROJECT TITLE:

Westborough Preschool Expansion Project
Construction Off-Road Equipment Exhaust



PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: EXHAUST ug/m^3

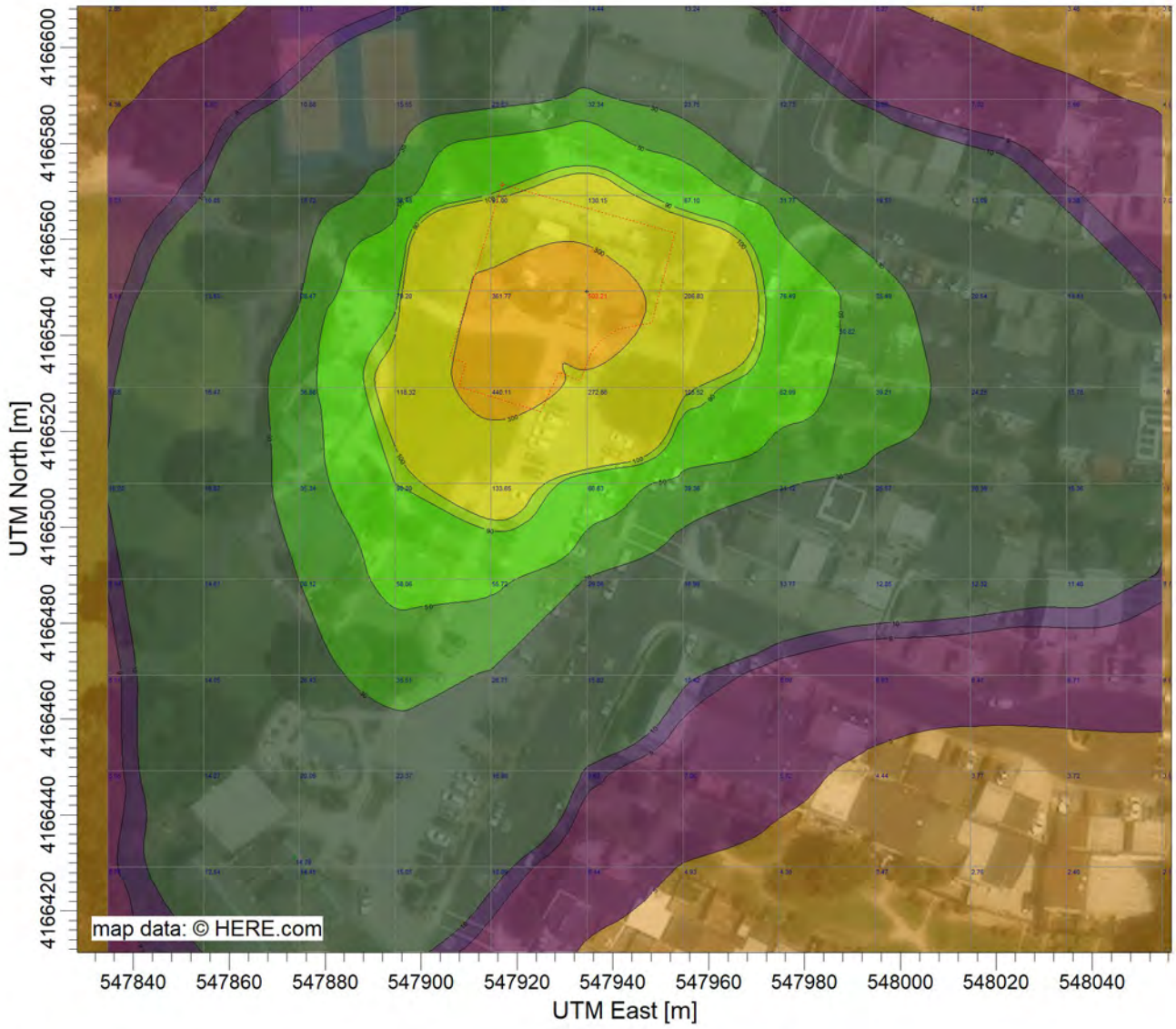
Max: 52.8 [ug/m^3] at (547914.62, 4166529.19)



COMMENTS:	SOURCES:	COMPANY NAME:	
Annual concentration based on unit emission rate.	**2**	**Baseline Environmental Consulting**	
	RECEPTORS: **170**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:1,697 0 0.05 km	
	MAX: **52.8 ug/m^3**		PROJECT NO.: **25218-00**

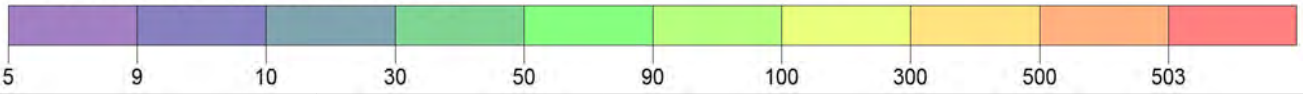
PROJECT TITLE:

Westborough Preschool Expansion Project
Construction Off-Road Equipment Fugitive Dust



PLOT FILE OF PERIOD VALUES AVERAGED ACROSS 0 YEARS FOR SOURCE GROUP: DUST ug/m^3

Max: 503 [ug/m^3] at (547934.62, 4166549.19)



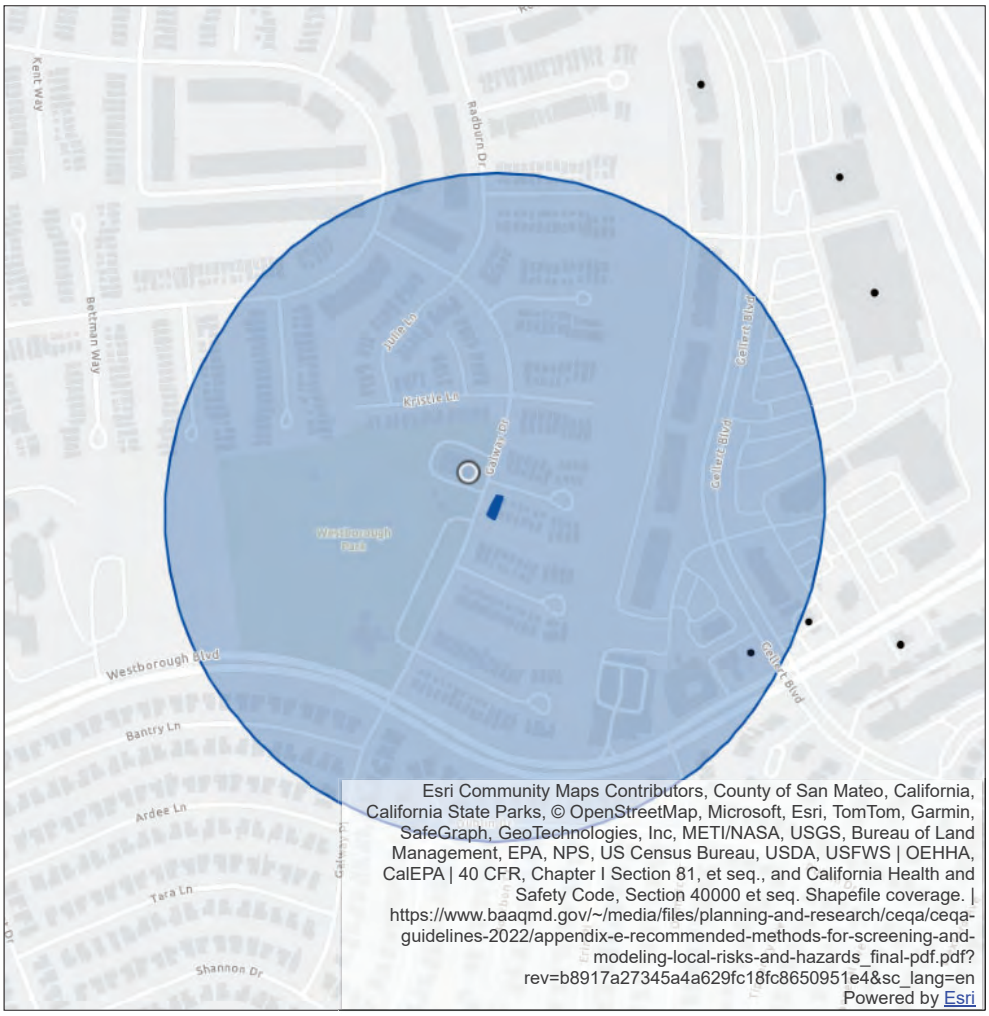
COMMENTS: Annual concentration based on unit emission rate.	SOURCES: **2**	COMPANY NAME: **Baseline Environmental Consulting**	
	RECEPTORS: **170**		
	OUTPUT TYPE: **Concentration**	SCALE: 1:1,435 0 0.05 km	
	MAX: **503 ug/m^3**		PROJECT NO.: **25218-00**

Near Me Report

Area of Interest (AOI) Information

Area: 3,334,597.14 ft²

Date: Thu Dec 11 2025 14:26:35 GMT-0800 (Pacific Standard Time)



Permitted Stationary Sources
●

Bay Area Air District Boundary

Overburdened Communities

Permitted Stationary Sources | Total count: 1

#	OBJECTID	FacilityID	FacilityName
1	10329	112119-1	ARCO Facility #83129

#	Address	City	State
1	2300 Westborough Blvd	South San Francisco	CA

#	Zip	County	Latitude
1	94080	San Mateo	37.643587

#	Longitude	SourceType	NAICS
1	-122.453325	Retail Gas Station	457110

#	NAICS Sector	NAICS Subsector	NAICS Industry
1	Retail Trade	Gasoline Stations	Gasoline Stations with Convenience Stores

#	CancerRisk	ChronicHI	PM25	Throughput_Gal/yr
1	*No data*	*No data*	0.00	726832.0

APPENDIX B

Geotechnical Evaluation and Geologic Hazards Assessment

Geotechnical Evaluation and Geologic Hazards Assessment

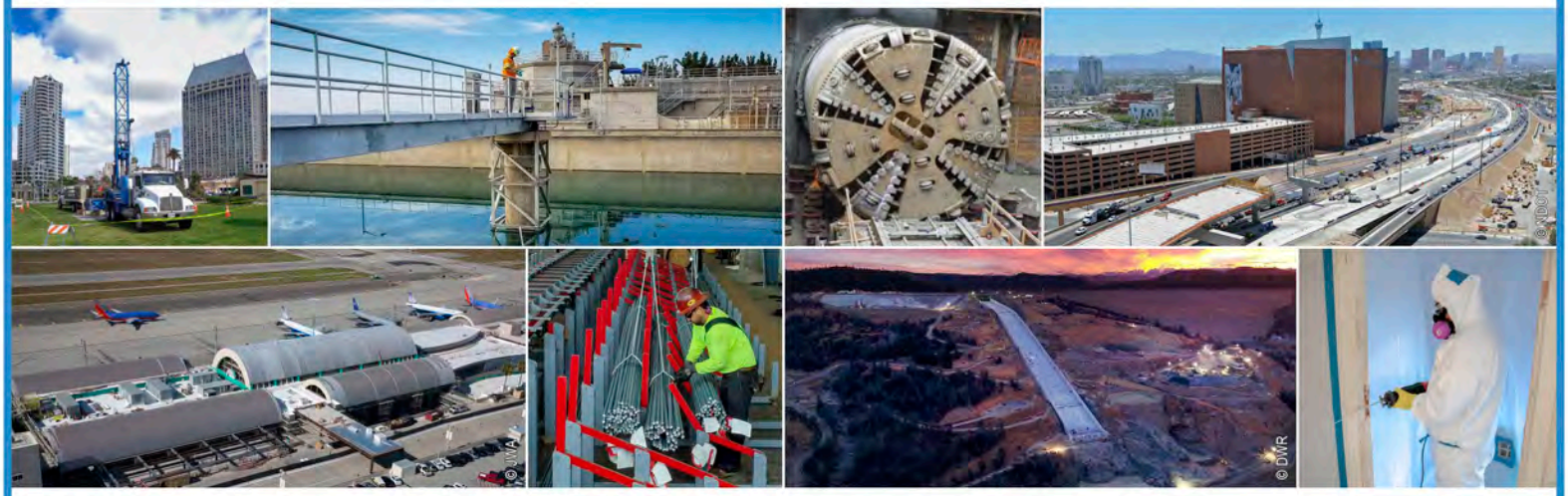
New Portable Classrooms
Westborough Recreation Center
2380 Galway Drive

South San Francisco, California

Kitchell

405 14th Street, Suite 1000 | Oakland, California 94612

August 9, 2024 | Project No. 404831001



Geotechnical | Environmental | Construction Inspection & Testing | Forensic Engineering & Expert Witness

Geophysics | Engineering Geology | Laboratory Testing | Industrial Hygiene | Occupational Safety | Air Quality | GIS

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

35+ YEARS

Geotechnical Evaluation and Geologic Hazards Assessment

New Portable Classrooms
Westborough Recreation Center
2380 Galway Drive
South San Francisco, California

Mr. Farshid Samsami
Kitchell
405 14th Street, Suite 1000 | Oakland, California 94612

August 9, 2024 | Project No. 404831001

Shravya S. Anipindi
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Project Engineer

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Senior Project Geologist

SSA/ARD/TBG/CEH/gvr

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1 INTRODUCTION

In accordance with your authorization, we have conducted a geotechnical evaluation and geologic hazards assessment for the new portable classrooms located at 2350 and 2380 Galway Drive, in South San Francisco, California (Figure 1). The scope of our evaluation and assessment was conducted in accordance with our proposal dated June 28, 2024. The purpose of our study was to assess the subsurface conditions and geologic hazards at the site, and to provide recommendations for the design and construction of the proposed new portable classrooms. This report presents the findings and conclusions from our geohazard assessment and geotechnical evaluation, and our recommendations for the geotechnical aspects of design and construction of this project.

2 SCOPE OF SERVICES

Our scope of services included the following:

- Reviewing readily available geologic and seismic literature pertinent to the project area including geologic maps and reports, regional fault maps, seismic hazard maps, and aerial imagery.
- Reviewing existing geotechnical reports or subsurface information that is available in the vicinity of the site.
- Performing a site reconnaissance to observe the general site conditions and to mark the locations for our subsurface exploration.
- Reviewing existing utility plans provided. Coordination with Underground Service Alert (USA) to locate underground utilities in the vicinity of our subsurface exploration.
- Performing a private utility survey by ground penetrating radar and electro-magnetic scanning to check the exploration locations for potential conflicts with underground utilities.
- Obtaining a drilling permit from San Mateo County Environmental Health Services.
- Performing a subsurface exploration consisting of six (6) borings.
- Laboratory testing on selected samples to evaluate in-situ soil density and moisture content, Atterberg limits, particle size distribution, shear strength, expansion index, R-value, and soil corrosivity.
- Compiling and performing engineering analysis of the field and laboratory data, and the findings from our background review.
- Preparing this geotechnical report presenting our findings regarding the geotechnical conditions encountered at the project site, the conclusions from our geologic hazards assessment, and our recommendations for the design and construction of the project.

3 SITE DESCRIPTION

The site is located northwest of the intersection of Galway Drive and Westborough Boulevard in South San Francisco, California (Figure 1) and is part of Westborough Park. The three potential locations are located in the eastern portion of the park, bound by South San Francisco Fire Department Station 64 to the north, Galway Drive to the east, Westborough Boulevard to the south, and Westborough Park to the west (Figures 1 and 2). The overall site is relatively flat when moving from the north to the south, with elevations varying between 409 to 430 feet above mean sea level (MSL) (Google, 2024). The site is sloped when moving from the east to the west of the site, with an estimated percent grade of around 25.

The park is located on the United States Geological Survey (CGS, 2021) San Francisco South 7.5-minute quadrangle, with the approximate center of the three potential building locations at 37.6442° north latitude and 122.4574° west longitude.

4 PROJECT DESCRIPTION

Based on our correspondence and the site boundary document provided to us, we understand that the new portable classrooms will be installed in one of the three locations (Figure 2):

Option 1 – the area south of South San Francisco Fire Department Station 64 currently used as a maintenance yard;

Option 2 – the grass field and basketball court east of Westborough Norrha Kid Playground and west of the parking lot;

Option 3 – an area west of the existing Westborough Recreation Building and east of the ballfield.

We understand that the approach will be to grade a flat pad for the structure. Depending on which option is chosen, grading of the slope and the use of retaining walls may be needed.

5 FIELD EXPLORATION AND LABORATORY TESTING

5.1 Field Exploration

Our field exploration for this study included a site reconnaissance and subsurface exploration. The subsurface exploration was conducted on July 8, 2024, and consisted of the drilling, logging, and sampling of six solid-stem auger borings. Prior to commencing our subsurface exploration, we notified Underground Service Alert (USA) for field marking of the existing utilities and a private utility

survey was conducted to further assess and locate any utilities that may conflict with the exploration locations. The approximate locations of our borings are presented on Figure 2.

5.1.1 Geotechnical Borings

Ninyo & Moore retained Hanlon Drilling of Granite Bay, California to drill six geotechnical borings with a CME-75 truck-mounted drill rig, equipped with 4-inch-diameter solid flight augers. The borings were advanced to depths up to about 36 feet below the existing grade (bgs). Disturbed and relatively undisturbed soil samples were collected from the boreholes using a 3-inch outside diameter (O.D.) Modified California sampler lined with 2½-inch O.D. stainless steel liners or a split barrel Standard Penetration Test (SPT) sampler with an O.D. of 2 inches and an unlined internal diameter of 1⅜ inches. The contractor drove the samplers into the underlying soil a maximum of 18 inches, using a 140-pound automatic trip hammer falling 30 inches. The number of blows required to drive the sampler the last 12 inches of the 18-inch drive are shown as BLOWS/FOOT (blows per foot) on the boring logs. The blow count values on the boring logs have not been corrected for the effects of overburden pressure, sampler size or hammer efficiency.

A representative from Ninyo & Moore logged the samples in the field before transporting them to our geotechnical laboratory for testing. These field logs were then used to develop the boring logs included with this report (Appendix A).

The borings were backfilled with neat cement grout after completion of drilling and sampling.

5.2 Laboratory Testing

Geotechnical laboratory testing of soil samples recovered from the borings included tests to evaluate in-situ soil density and moisture content, Atterberg limits, particle size distribution, shear strength, expansion index, R-value, and soil corrosivity. The results of the laboratory tests performed are presented in Appendix B, with the results of the in-place moisture content and dry density tests (shown at the corresponding sample depths) included on the boring logs in Appendix A.

Additionally, one sample of the near-surface soil was sent to CERCO Analytical (CERCO) in Concord, California for corrosivity analysis. The results of this analysis, including a brief evaluation, are presented in Appendix C, and are discussed in Section 7.6.

6 GEOLOGIC AND SUBSURFACE CONDITIONS

Our findings regarding regional geologic setting, site geology, subsurface stratigraphy, and groundwater conditions at the subject site are provided in the following sections.

6.1 Regional Geologic Setting

The site is located approximately 2½ miles west of San Francisco Bay, on the San Francisco Peninsula. The San Francisco Peninsula is part of the Coast Ranges geomorphic province of California. The Coast Ranges have experienced a complex geological history that has resulted in a series of northwest-trending mountain ranges and valleys. The present physiography and geology of the Coast Ranges are a result of deposition and deformation along the boundary between the North American plate and the Pacific plate, a tectonic setting experiencing both translational and compressional stresses. Movement along this boundary is largely concentrated along well-known fault zones, including the San Andreas, Calaveras, and Hayward faults, as well as associated lesser-order faults.

Bedrock in the Coast Ranges typically consists of igneous, metamorphic, and sedimentary rock ranging in age from the Jurassic to the Pleistocene.

6.2 Site Geology

Regional geology of the city of South San Francisco and San Francisco Bay has been the subject of numerous studies for more than 100 years. Many of these studies were conducted in response to damage caused by the 1906 San Francisco and the 1989 Loma Prieta earthquakes, and for the design of the bridges that cross San Francisco Bay. Regional geologic mapping by Bonilla (1998) indicates that the site is underlain by the Merced Formation, which consists of Pleistocene and Pliocene sandstone, siltstone and claystone, with some conglomerate lenses and minor volcanic ash. A map of the regional geology is presented as Figure 3.

6.3 Subsurface Conditions

The following sections provide a generalized description of the geologic units encountered during our subsurface evaluation at the project site. More detailed descriptions are presented on the boring logs in Appendix A. Our interpretation of the subsurface conditions is depicted on the geologic cross-sections in Appendix D.

6.3.1 Pavement Section

Pavement was encountered at the surface at Borings B-2 and B-4, both of which are located in the parking lot to the east of the site. The pavement section consisted of 3 to 3½ inches of asphaltic concrete overlying 5 to 6 inches of aggregate base rock.

6.3.2 Undocumented Fill

Fill materials were encountered in Borings B-4 and B-6 from beneath the pavement to the depths explored and in Boring B-5 from the ground surface to a depth of about 10 feet bgs. The fill, as encountered in the borings, generally consisted of very stiff, sandy silt, medium dense clayey sand, hard, silty clay, and stiff to hard, lean clay.

6.3.3 Merced Formation (QTm)

The Merced Formation was encountered in Borings B-1, B-2, B-3 from beneath the ground surface or pavement to the depths explored. In Borings B-4 and B-5, the Merced Formation was encountered below the undocumented fill from a depth of about 10 feet bgs to the depths explored. The Merced Formation, as encountered in the borings, generally consisted of very stiff to hard, sandy silt with varying amounts of scattered well-rounded gravel.

6.4 Groundwater

Groundwater was not encountered in the borings. Fluctuations in the groundwater level across the site and over time may occur due to seasonal precipitation, variations in topography or subsurface hydrogeologic conditions, or as a result of changes to nearby irrigation practices or groundwater pumping. In addition, seeps may be encountered at elevations above the observed groundwater levels due to perched groundwater conditions, leaking pipes, preferential drainage, or other factors not evident at the time of our exploration.

According the California Geological Survey (CGS, 2021), the site is not located within the limits of any groundwater basin.

7 GEOLOGIC HAZARDS AND CONSIDERATIONS

The geohazards assessment portion of this evaluation considered geologic conditions within the area that could be a potential danger to life or property. Potential concerns evaluated included seismic activity and associated ground motion, ground rupture, liquefaction and strain softening, slope stability (landsliding), flood hazards (including flooding associated with dam failure and

tsunami), expansive soil, static settlement of compressible soil layers, and corrosivity of the near-surface soil. These issues are discussed in the following subsections.

7.1 Seismology and Calculation of Earthquake Ground Motion

The site is located within the San Francisco Bay Area, a region considered seismically active due to the presence of multiple active faults. Numerous small earthquakes occur every year in the region, and large (greater than Moment Magnitude 7) earthquakes have occurred in the past, and can be expected to occur in the future. In the following sections, we discuss the historical seismicity of the region and the effect on the site, and the potential for strong ground motion.

7.1.1 Historical Seismicity

Figure 4 presents the location of the site relative to the epicenters of historic earthquakes with magnitudes of 5.5 or more from 1800 to 2000. Table 1, below summarizes historical seismic events in the region based on a search of the USGS Earthquake Catalog for events between 1800 and today, with a magnitude ≥5.5, and located within an 80-kilometer radius of the site.

Table 1 – Summary of Historical Seismicity[1]

Event ID	Date	Magnitude	Approximate Distance from Site	
			Km	Miles
The 2014 South Napa, California Earthquake	08/24/2014	6.0	64.8	40.2
15 km NE of East Foothills, California	03/31/1986	5.7	70.4	43.7
The 1984 Morgan Hill, California Earthquake	04/24/1984	6.2	78.1	48.6
The 1980 Livermore, California Earthquake	01/24/1980	5.8	61.0	37.9
7 km NNW of Boulder Creek, California	09/05/1955	5.8	57.6	35.8
1 km WNW of Davenport, California	10/24/1926	5.5	73.1	45.5
The 1906 San Francisco, California Earthquake	04/18/1906	7.9	14.3	8.9
Near San Jose, California	08/03/1903	6.2	69.5	43.2
Near San Jose, California	06/11/1903	6.1	76.2	47.4
Near San Francisco, California	06/02/1899	5.6	7.2	4.5
South of Sonoma, California	03/31/1898	6.4	61.9	38.5
Near Napa, California	10/12/1891	5.8	73.1	45.4
Near San Jose, California	01/02/1891	5.8	69.5	43.2
San Francisco Bay area, California	07/31/1889	5.6	28.5	17.7
North of Antioch, California	05/19/1889	6.0	76.8	47.7
West of Santa Cruz, California	03/26/1884	5.9	73.9	46.0
Santa Cruz Mountains, California	06/27/1882	5.8	78.0	48.5

Table 1 – Summary of Historical Seismicity[1]				
Event ID	Date	Magnitude	Approximate Distance from Site	
			Km	Miles
Near Berkeley, California	04/02/1870	5.8	31.6	19.7
North of Santa Cruz, California	02/17/1870	5.9	72.8	45.2
The 1868 Hayward Fault, California Earthquake	10/21/1868	6.8	32.1	19.9
South of San Jose, California	10/08/1865	6.5	69.7	43.3
Alameda County, California	05/21/1864	5.8	49.3	30.7
Alameda County, California	03/05/1864	6.0	54.0	33.6
Near San Ramon, California	07/04/1861	5.8	46.2	28.7
North of San Jose, California	11/26/1858	6.2	60.1	37.4
San Mateo County, California	02/15/1856	5.9	21.2	13.2
Offshore San Mateo County, California	01/02/1856	5.7	38.5	23.9
North of San Francisco, California	08/27/1855	5.5	50.8	31.6
The 1838 San Andreas Fault, California Earthquake	06/25/1838	7.4	46.9	29.2
Near San Francisco, California	06/21/1808	5.5	21.4	13.3

Note:
[1] United States Geological Survey (USGS), Earthquake Hazards Program, https://earthquake.usgs.gov/earthquakes/search/

Records compiled by Schmitt et al. (2022), indicate that no ground effects related to historical seismic activity (e.g. liquefaction, sand boils, lateral spreading, ground cracking, landsliding) have been reported for the site vicinity.

7.1.2 Ground Motion

The project site is located within the San Francisco Bay Area, a seismically active region. There are several active faults in the Bay Area, including the San Andreas, Hayward, and Calaveras, that are capable of producing strong ground shaking at the site. The Working Group on California Earthquake Probabilities (WGCEP) periodically assesses the probabilities of earthquakes for numerous faults in California and provides probability estimates (Field et al., 2015). According to the 2015 assessment, there is a 72 percent probability that at least one magnitude 6.7 or greater earthquake will occur in the Bay Area between 2014 and 2043. Probabilities of a magnitude 6.7 or greater earthquake occurring on the Hayward, Calaveras, and San Andreas faults during this period are 14.3%, 7.4%, and 6.4%, respectively.

Considering the proximity of the site to active faults capable of producing a maximum moment magnitude of 6.0 or more, the project area has a high potential for experiencing strong ground motion. The peak ground acceleration with adjustment for site class effects (PGA_M) was calculated using the seismic design tool developed by the Structural Engineers Association of California in conjunction with the Office of Statewide Health Planning and Development (SEAOC/OSHPD, 2022). The site modified peak ground acceleration, PGA_M, modified based on Site Class D-Stiff Soil, calculated based on the 2022 CBC and American Society of Civil Engineers (ASCE) Standard 7-16, is 1.257g. The Site Class utilized is Site Class D-Stiff Soil, since the site is unlikely to contain E or F soil given the soil profile of undocumented fill and the Merced Formation. Seismic design parameters calculated using the SEAOC/OSHPD web-based seismic design tool are provided below in Section 9.1.

7.2 Fault Rupture Hazard Analysis

In response to hazards associated with ground rupture, or surface displacement, the State of California enacted the Alquist-Priolo (A-P) Earthquake Fault Zoning Act (A-P Act) in 1972. The purpose of the A-P Act is to regulate development of structures for human occupancy in areas within active fault zones in order to reduce the hazards associated with ground rupture. The A-P Act requires that the State Geologist delineate zones of required investigation along active faults to evaluate these risks. As defined by the California Geological Survey (CGS, 2018), active faults are faults that have caused surface displacement within Holocene time, or within approximately the last 11,700 years. Based on our review, the site is not located within an established Earthquake Fault Zone (CGS, 1982) (Figure 5).

The San Francisco Bay Area is considered seismically active due to the presence of multiple faults in the region. Figure 4 shows the approximate locations of active and potentially active faults, as well as significant historical earthquake epicenters mapped within the San Francisco Bay Region.

The nearest known active fault is the San Andreas fault, located less than 1 mile west of the site. Table 2, below, shows the fault characteristics of known nearby active and potentially active faults capable of producing significant ground shaking at the site. Active and potentially active faults are designated due to offsets in the geologic units along the fault from the Holocene time (the last 11,000 years) and the Quaternary period (the last 1,800,000 years), respectively (CGS, 2003).

Table 2 – Principal Active Faults				
Fault	Type	Approximate Fault-to-Site Distance		Maximum Moment Magnitude
		Miles	Kilometers	Ellsworth[1]
N. San Andreas	strike-slip	0.3	0.5	7.9
San Gregorio Connected	strike-slip	5.3	8.4	7.5
Hayward-Rodgers Creek	strike-slip	18.2	29.2	7.3
Monte Vista-Shannon	thrust	18.2	29.3	6.5
Calaveras	strike-slip	27.2	43.8	7
Mount Diablo Thrust	thrust	27.9	44.9	6.7
Point Reyes	reverse	29.2	47.0	6.9
Green Valley Connected	strike-slip	31.1	50.0	6.8

Note:
[1]WGCEP (2013)

Based on our review of the referenced geologic maps, the project site is not underlain by known active faults (i.e., faults that exhibit evidence of surface displacement in the last 11,700 years). Therefore, the potential for ground surface rupture because of faulting at the site is considered low. Lurching or cracking of the ground surface as a result of nearby seismic events is possible.

7.3 Liquefaction/Seismic Settlement Analysis

The strong vibratory motions generated by earthquakes can trigger a rapid loss of shear strength in saturated, loose, granular soils of low plasticity (liquefaction) or in wet, sensitive, cohesive soils (strain softening). Liquefaction and strain softening can result in a loss of foundation bearing capacity or lateral spreading of sloping or unconfined ground. Liquefaction can also generate sand boils leading to subsidence at the ground surface. The potential for liquefaction to occur is considered more significant where Holocene alluvial deposits along with shallow groundwater are present within the upper 50 feet of the ground surface.

7.3.1 Liquefaction

As shown in Figure 5, the site is not located within a liquefaction hazard zone established by the State Geologist (CGS, 2021). Regional studies of liquefaction susceptibility (Knudsen et al., 2000) indicate that the liquefaction susceptibility at the site is very low (Figure 5).

Due to the fine granular materials encountered in our borings and with no groundwater encountered, we do not regard the potential for liquefaction as design considerations for the project.

The moisture content of the clay encountered during our subsurface exploration, when compared to the liquid limit and plastic limit from the results of our laboratory testing, is not consistent with a soil that is particularly sensitive. As such, we do not regard seismically induced strain-softening behavior as a design consideration.

7.3.2 Dynamic Settlement

The strong vibratory motion associated with earthquakes can also dynamically compact loose granular soil, which leads to surficial settlements. Dynamic settlement may occur in both dry and saturated sand as well as silt. Cohesive soil is not typically susceptible to dynamic settlement. Based on the subsurface materials encountered, we do not regard dynamic settlement as a design consideration.

7.3.3 Sand-Boil-Induced Ground Subsidence

Sand boils that occur when liquefied, near-surface soil escapes to the ground surface, can result in ground subsidence due to a loss of material that is in addition to dynamic settlement. We do not anticipate liquefaction at the site and as such, we do not anticipate the occurrence of sand boil and ground subsidence at the site.

7.3.4 Lateral Spreading

In addition to vertical displacements, seismic ground shaking can induce horizontal displacements as surficial soil deposits spread laterally by floating atop liquefied subsurface layers. Lateral spread can occur on sloping ground or on flat ground adjacent to an exposed face. Liquefiable soil layers were not encountered during our exploration. Based on the absence of liquefaction at the site, we do not anticipate that lateral spreading will occur near the proposed improvements following a significant seismic event.

7.4 Seismic Slope Stability

The proposed project is not located within a hazard zone for earthquake-induced landslides as shown on the Seismic Hazard Zones Map (Figure 5) prepared by the CGS (2021). Additionally, the site is relatively flat when moving north to south of the site, but sloped when moving from the east to the west of the site with elevations varying between 409 to 430 feet above MSL (Google, 2024) over a horizontal distance of 240 feet (equating to about a 25 percent grade). Due to the shallow slope angle and subsurface conditions explored, we do not expect slope stability to be a design consideration.

7.5 Expansive Soil

Some clay minerals undergo volume changes upon wetting or drying. Unsaturated soil containing those minerals will shrink/swell with the removal/addition of water. The heaving pressures associated with this volume change can damage structures and flatwork. The expansion index test resulted in “very low”, “low”, and “low” expansion potential for soils in Borings B-1, B-4, and B-5, respectively, we judge that risks related to expansive soils are low.

7.6 Corrosive/Deleterious Soil

As previously mentioned, a corrosivity analysis was performed by CERCO on a sample of the near-surface soil. Based on the resistivity measurement, CERCO categorizes the soil sample as “corrosive” and recommends that *“All buried iron, steel, cast iron, ductile iron, galvanized steel and dielectric coated steel or iron should be properly protected against corrosion depending upon the critical nature of the structure. All buried metallic pressure piping such as ductile iron firewater pipelines should be protected against corrosion”*. The full evaluation, including test results, prepared by CERCO is provided in Appendix C.

7.7 Flooding

7.7.1 Riverine

Based on the flood insurance rate maps (FIRMs) prepared by the Federal Emergency Management Agency (FEMA, 2019), the site lies in an area of minimal flood hazard, labeled Zone X (unshaded). Areas designated as Zone X (unshaded) are determined to be outside the 0.2 percent annual chance flood plain (500-year flood zone). A copy of the FIRM is presented in Figure 7.

7.7.2 Dam Inundation

Properties located downstream of dams can be inundated with flood waters if the dams were to fail. Dam owners are required to prepare inundation maps showing the limits of flooding caused by dam failure. There are no dams or large reservoirs located upstream of the site that could fail and inundate the site (DSOD, 2024). As such, inundation due to dam failure is not a design consideration for this project.

7.7.3 Tsunami and Seiche Inundation

Tsunamis are long wavelength seismic sea waves (long compared to ocean depth) generated by the sudden movements of the ocean floor during submarine earthquakes, landslides, or volcanic activity. The Tsunami Hazard Area Map (Figure 6) for San Mateo County (State of California, 2021) and ABAG (2024) map the site outside a tsunami hazard area.

Seiches are waves generated in a large enclosed body of water. Based on the inland location of the site and considering that there are no large enclosed bodies of water nearby, the potential for damage due to tsunamis or seiches is not a design consideration.

7.8 Unsuitable Materials

Fill materials that were not placed and compacted under the observation of a geotechnical engineer, or fill materials lacking documentation of such observation, are considered to be undocumented fill and unsuitable as a bearing material below foundations due to the potential for differential settlement resulting from variable support characteristics or the potential inclusion of deleterious materials. Undocumented fill was encountered in Borings B-4, B-5, and B-6. Based on our review of available topographic maps, and comparing contours from 1956 and 2020, we anticipate the thickness of the undocumented material may be on the order of 50 to 60 feet in some locations. The estimated extent of the undocumented fill, is shown in our cross sections (Appendix D). Recommendations for remedial grading associated with undocumented fill are presented in Section 9.2.3.

7.9 Naturally Occurring Asbestos

Natural occurrences of asbestos are more likely to be encountered in, and immediately adjacent to, outcrops of serpentinite and ultramafic rocks. Serpentinite and ultramafic rocks were not encountered during our subsurface exploration. Regional mapping by Churchill and Hill (2000) indicate that no ultramafic rocks have been mapped in the general vicinity of the project. Based on these conditions, we judge that the risk of encountering significant concentrations of naturally occurring asbestos at the site is low.

7.10 Static Settlement

Although building loads were not available at the time of this report, based on the results of our subsurface evaluation and laboratory testing, and the absence of compressible soil layers, static settlement due to building loads is anticipated to be on the order of 1 inch, with associated differential settlement of about ½ inches over a distance of 50 ft.

7.11 Collapsible Soils

Collapsible soil is broadly defined as loose and cemented soil with low moisture content that is susceptible to a large and sudden reduction in volume upon wetting, with no increase in vertical stress. The process of soil collapse upon wetting is referred to as hydrocollapse. Another type of collapse can occur in saturated soil bearing soluble minerals when subjected to continuous leaching. Some common soluble soil minerals include calcium chloride, magnesium chloride, sodium chloride, potassium chloride, gypsum, anhydrite, dolomite, and calcium carbonate (Mansour et al., 2008). The composition of minerals dissolved in leaching water will affect the soil mineral dissolution rate. Collapsible soils were not encountered during our subsurface evaluation.

8 CONCLUSIONS

Based on our review of the referenced background data, our site field reconnaissance, subsurface evaluation, and laboratory testing, it is our opinion that proposed construction is feasible from a geotechnical standpoint. Geotechnical considerations include the following:

- Our subsurface exploration encountered fill and the Merced formation. The fill, as encountered in the borings B-4, B-5 and B-6, generally consisted very stiff, sandy silt, hard silty clay, and stiff to hard, lean clay. The Merced formation, as encountered in the borings B-1, B-2, B-3, B-4 and B-5, generally very stiff to hard, sandy silt with varying amounts of scattered well-rounded gravel.

- Groundwater was not encountered in our borings. The site is not within the limits of any groundwater basins. Variation and fluctuation in groundwater levels should be anticipated as discussed in Section 6.4.

- The site could experience a relatively large degree of ground shaking during a significant earthquake on a nearby fault. Seismic design criteria are presented in Section 9.1.

- The site has a low liquefaction potential (Knudsen, 2000), and based on our subsurface evaluation we do not anticipate liquefaction or any associated effects of liquefaction (dynamic settlement, sand-boil-induced ground subsidence, or lateral spreading) to be design constraints for the project.

- Based on the nature of the proposed improvements, static settlement of new foundations is estimated to be less than approximately 1 inch with a differential static settlement of less than ½ inch over 50 feet.

- Landslides, seiches, dam inundation, flood hazard and ground surface rupture due to faulting are not design considerations based on the location and subsurface conditions of the project site.

- High concentrations of naturally occurring asbestos (NOA) in the natural soils at the site are unlikely based on the location of the project and the findings from our subsurface exploration.

- Expansion Index testing indicates that the near-surface soil on site has a very low to low expansion characteristic.

- Based on the results of the soil corrosivity tests during this study, the soils are considered to be corrosive (Appendix C) to buried metal structures. A corrosion engineer should be consulted to provide specific guidance on protective measures to mitigate corrosion.

9 RECOMMENDATIONS

The following sections present our geotechnical recommendations for the design and construction of the proposed improvements. The project improvements should be designed and constructed in accordance with these recommendations, applicable codes, and appropriate construction practices.

9.1 Seismic Design Criteria

Table 3 presents the Risk-Targeted, Maximum Considered Earthquake (MCE_R) spectral response accelerations consistent with the 2022 California Building Code (CBC) and corresponding site-adjusted and design level spectral response accelerations based on the USGS seismic design maps (SEAOC/OSHPD, 2023). Seismic Site Class D- Stiff Soil was selected based on the subsurface conditions encountered in this report (see Section 6.3). The seismic design criteria provided in the table may be used for structures with a fundamental period of ½ second or less such that the exception to Site Class F in Section 20.3.1-1 of ASCE Standard 7-16 is applicable.

Table 3 – 2022 California Building Code Seismic Design Criteria

Site Coefficients and Spectral Response Acceleration Parameters	Values
Site Class	D – Stiff Soil
Site Coefficient, F_a	1
Site Coefficient, F_v	-
Mapped Spectral Response Acceleration at Short Periods, S_s	2.448g
Mapped Spectral Response Acceleration at 1.0-second Period, S_1	1.026g
Site-Specific Spectral Response Acceleration at Short Periods, S_{MS}	2.448g
Site-Specific Spectral Response Acceleration at 1.0-second Period, S_{M1}	-
Site-Specific Design Spectral Response Acceleration at Short Periods, S_{DS}	1.632g
Site-Specific Design Spectral Response Acceleration at 1.0-second Period, S_{D1}	-
Site-Specific Maximum Considered Earthquake Geometric Mean (MCEG) Peak Ground Acceleration, PGA_M	1.151g
Risk Category	II

9.2 Earthwork

Earthwork should be performed in accordance with the requirements of applicable governing agencies and the recommendations presented below. The geotechnical consultant should observe foundation excavations and earthwork operations. Evaluations performed by the geotechnical consultant during the course of operations may result in new recommendations, which could supersede the recommendations in this section.

9.2.1 Pre-Construction Conference

We recommend that a pre-construction conference be held to discuss the recommendations presented in the report. Representatives of the District, the design engineer, Ninyo & Moore, and the contractor should be in attendance to discuss project schedule and earthwork requirements.

9.2.2 Site Preparation

Site preparation should begin with the removal of existing vegetation, utility lines, debris and other deleterious materials from areas to be graded. Tree stumps and roots should be removed to such a depth that organic material is generally not present. Clearing and grubbing should extend beyond the proposed excavation and fill areas. Rubble and excavated materials that do not meet criteria for use as fill should be disposed of in an appropriate landfill. Existing utilities in the work area should be relocated away from the proposed structures. Existing utilities to be abandoned should be removed, crushed in place, or backfilled with grout.

Excavations resulting from removal of buried utilities, tree stumps, or obstructions should be backfilled with compacted fill in accordance with the recommendations in the following sections.

9.2.3 Observation and Removals

Prior to placement of fill, or the placement of forms or reinforcement for foundations, the client should request an evaluation of the exposed subgrade by Ninyo & Moore. Materials that are considered unsuitable shall be excavated under the observation of Ninyo & Moore in accordance with the recommendations in this section or supplemental recommendations by the geotechnical engineer.

Unsuitable materials include, but may not be limited to dry, loose, soft, wet, expansive, organic, or compressible natural soil, and undocumented or otherwise deleterious fill materials. Unsuitable materials should be removed from trench bottoms and below bearing surfaces to a

depth at which suitable foundation subgrade is exposed, as evaluated in the field by Ninyo & Moore.

9.2.4 Material Recommendations

Materials used during earthwork, grading, and paving operations should comply with the requirements listed in Table 4. Materials should be evaluated by the geotechnical engineer for suitability prior to use. The contractor should notify the geotechnical consultant prior to import of materials or use of on-site materials to permit time for sampling, testing, and evaluation of the proposed materials. On-site materials may need to be dried out before re-use as fill. The contractor should be responsible for the uniformity of import material brought to the site.

Table 4 – Recommended Material Requirements

Material and Use	Source	Requirements[1,2,3]
Select Fill: • Top 18 inches of finished pad below building slabs • Top 12 inches of finished subgrade below concrete flatwork	Import	Close-graded with 35% or more passing No. 4 sieve and either: • Expansion Index of 50 or less, • Plasticity Index of 12 or less, or • Less than 10 percent, by dry weight, passing No. 200 sieve
Pipe/Conduit Bedding and Pipe Zone Material: • Material below conduit invert to 12 inches above conduit	Import	90 to 100 percent (by mass) should pass No. 4 sieve, and 5 percent or less should pass No. 200 sieve
Trench Backfill: • Above bedding material	Import or On-Site Borrow	As per general fill and excluding rock/lumps retained on 4-inch sieve or 2-inch sieve in top 12 inches
Controlled Low Strength Material (CLSM)	Import	CSS[5] Section 19-3.02G

Notes:
1 In general, fill should be free of rocks or lumps in excess of 6 inches in diameter, trash, debris, roots, vegetation or other deleterious material.
2 In general, import fill should be tested or documented to be non-corrosive[4] and free from hazardous materials in concentrations above levels of concern.
3 Specifications of utility owner or local agency may supersede the requirements indicated in this table
4 Non-corrosive as defined by the Corrosion Guidelines (Caltrans, 2021).
5 California Standard Specifications (Caltrans, 2018).

9.2.5 Subgrade Preparation

Subgrade below slabs or fill should be prepared as per the recommendations in Table 5. Prepared subgrade should be maintained in a moist (but not saturated) condition by the periodic sprinkling of water prior to placement of additional overlying fill. Subgrade that has been permitted to dry out and loosen or develop desiccation cracking, should be scarified, moisture-conditioned, and recompacted as per the requirements above

Table 5 – Subgrade Preparation Recommendations

Subgrade Location	Recommendations
Below Slabs, Pavement, and General Fill	• After clearing, per Section 9.2.2, check for unsuitable materials, as per Section 9.2.3 • Scarify 8 inches then moisture condition and compact per Section 9.2.6 • Keep in a moist condition

9.2.6 Fill Placement and Compaction

Fill and backfill should be compacted in horizontal lifts in conformance with the recommendations presented in Table 6. The allowable uncompacted thickness of each lift of fill depends on the type of compaction equipment utilized, but generally should not exceed 8 inches in loose thickness for large equipment and 4 inches for manually operated equipment.

Table 6 – Fill Placement and Compaction Recommendations

Fill Type	Location	Relative Compaction[1]	Minimum Moisture Content[2]
Subgrade	Below pavement (within 12 inches of finished subgrade)	95 percent	+2% or above
	Below slabs or fill and in locations not already specified	90 percent	+2% or above
General Fill	Below pavement (within 12 inches of finished subgrade)	95 percent	+2% or above
	In locations not already specified	90 percent	+2% or above
Bedding and Pipe Zone Fill	Material below invert to 12 inches above pipe or conduit	90 percent	±2% of Optimum
Trench Backfill	Top 12 inches below finish subgrade for areas subject to vehicular loading	95 percent	+2% or above
	In locations not already specified	90 percent	+2% or above
Aggregate Base	Below slabs-on-grade, flatwork and pavements	95%	Optimum

Notes:

1 Expressed as percent relative compaction or ratio of field density to reference density (typically on a dry density basis for soil and aggregate). The reference density of soil and aggregate should be evaluated by ASTM D1557.

2 Target moisture content at compaction relative to the optimum as evaluated by ASTM D1557.

Compacted fill should be maintained in a moist (but not saturated) condition by the periodic sprinkling of water prior to placement of additional overlying fill. Fill that has been permitted to dry out and loosen or develop desiccation cracking, should be scarified, moisture-conditioned, and recompacted as per the requirements above.

Prior to final subgrade preparation in the pavement areas, utility trench backfill should be properly placed and compacted as previously recommended. The compacted subgrade should be non-yielding when proof-rolled with a loaded ten-wheel truck, such as a water truck or dump truck, prior to pavement construction. Subgrade soils should be maintained in a moist and compacted condition until covered with the complete pavement section.

Aggregate base should be placed in thin lifts in a manner to prevent segregation, uniformly moisture conditioned, and compacted to at least 95 percent relative compaction to provide a smooth, unyielding surface.

9.2.7 Excavation Characteristics

We anticipate that the project will involve excavations for foundations and open pits or trenches for utilities. We anticipate that conventional earthmoving equipment in good working condition should be able to make the proposed excavations. Excavations in any fill that might be present may encounter obstructions consisting of debris, rubble, abandoned structures, or over-sized materials that may require special handling or demolition equipment for removal.

Near-vertical temporary cuts in the near surface deposits up to 4 feet in depth should remain stable for a limited period of time. However, sloughing of the materials exposed on the excavation sidewall may occur, particularly if the excavation extends near the groundwater level, encounters granular soil, is exposed to water, or if the sidewall is disturbed during construction operations. Excavation subgrade may become unstable if exposed to wet conditions. The subsurface materials at the project site are mainly cohesive and due to the groundwater levels discussed in Section 6.4, and sloughing around the excavations is not anticipated.

9.2.8 Temporary Excavations and Shoring

We understand that the total depth of the foundations are unknown but should be shallow.

Excavations should be stabilized in accordance with the Excavation Rules and Regulations (29 Code of Federal Regulations [CFR], Part 1926) stipulated by the Occupational Safety and

Health Administration (OSHA). Stabilization should consist of shoring sidewalls or laying slopes back.

Table 7 lists the OSHA material type classifications and corresponding allowable temporary slope layback inclinations for soil deposits that may be encountered on site. We encountered soils that consisted of very stiff, sandy silt, hard silty clay, stiff to hard, lean clay, and very stiff to hard, sandy silt with varying amounts of scattered well-rounded gravel, which corresponds to OSHA Type B soil. If materials other than those anticipated are encountered, Ninyo & Moore should be provided an opportunity to review subsurface conditions.

Alternatively, an internally-braced shoring system or trench shield conforming to the OSHA Excavation Rules and Regulations (29 CFR, Part 1926) may be used to stabilize excavation sidewalls during construction. The lateral earth pressures listed in Table 7 may be used to design or select the internally-braced shoring system or trench shield. The recommendations listed in Table 7 are based upon the limited subsurface data provided by our subsurface exploration and reflect the influence of the environmental conditions that existed at the time of our exploration. Excavation stability, material classifications, allowable slopes, and shoring pressures should be re-evaluated and revised, as-needed, during construction. Excavations, shoring systems and the surrounding areas should be evaluated daily by a competent person for indications of possible instability or collapse.

If the contractor intends to use temporary shoring to support the excavation during construction, and does not have a fully redundant groundwater control system (meaning extra pumps and power sources available on site at all times), then the shoring should be designed to resist full hydrostatic water pressures on the shoring.

Table 7 – OSHA Material Classifications and Allowable Slopes

Formation	OSHA Classification	Allowable Temporary Slope[1,2,3]	Lateral Earth Pressure on Shoring[4] (psf)
Merced formation	Type B	1H:1V (45°)	45×D + 72

Notes:
1 Allowable slope for excavations less than 20 feet deep. Excavation sidewalls in cohesive soil may be benched to meet the allowable slope criteria (measured from the bottom edge of the excavation). The allowable bench height is 4 feet. The bench at the bottom of the excavation may protrude above the allowable slope criteria.
2 In layered soil, layers shall not be sloped steeper than the layer below.
3 Temporary excavations less than 5 feet deep may be made with vertical side slopes and remain unshored if judged to be stable by a competent person (29 CFR, Part 1926.650).
4 'D' is depth of excavation for excavations up to 20 feet deep. Includes a surface surcharge equivalent to two feet of soil.

The shoring system should be designed or selected by a suitably qualified individual or specialty subcontractor. The shoring parameters presented in this report are preliminary design criteria, and the designer should evaluate the adequacy of these parameters and make appropriate modifications for their design. We recommend that the contractor take appropriate measures to protect workers. OSHA requirements pertaining to worker safety should be observed.

Excavations made in close proximity to existing structures may undermine the foundation of those structures and/or cause soil movement related distress to the existing structures. Stabilization techniques for excavations in close proximity to existing structures will need to account for the additional loads imposed on the shoring system and appropriate setback distances for temporary slopes. The contractor should be solely responsible for protection of existing site improvements and provide shoring and/or underpinning as needed.

The excavation bottoms may encounter wet, loose material which may be subject to pumping under heavy equipment loads. The contractor should be prepared to stabilize the bottom of the excavations. In general, unstable bottom conditions may be mitigated by using a stabilizing geogrid, overexcavating the excavation bottom to suitable depths and replacing with compacted fill, or other suitable method. Additionally, aeration of wet soils should be anticipated.

9.2.9 Utility Trenches

Trenches constructed for the installation of underground utilities should be stabilized in accordance with our recommendations in Section 9.2.8. Utility trenches should be backfilled with materials that conform to our recommendations in Section 9.2.4. Trench backfill, bedding, and pipe zone fill should be compacted in accordance with Section 9.2.6 of this report. Bedding and pipe zone fill should be shoveled under pipe haunches and compacted by manual or mechanical, hand-held tampers. Trench backfill should be compacted by mechanical means. Densification of trench backfill by flooding or jetting should not be permitted.

Trenches should not be excavated adjacent to footings. If trenches are to be excavated near a continuous footing, the bottom of the trench should be located above a 2:1 (horizontal to vertical) plane projected downward from the bottom of the footing. Utility lines that cross beneath footings should be encased in concrete or CLSM below the footing for a distance equivalent to the depth of the excavation.

9.3 Foundation Recommendations

Foundations should be designed in accordance with structural considerations and the following recommendations. In addition, requirements of the governing jurisdictions, practices of the Structural Engineers Association of California, and applicable building codes should be considered in the design of the structures. The foundation design parameters provided in the following sections are not intended to preclude differential movement of foundations. Minor cracking may occur.

9.3.1 Shallow Footings

New footings should bear at a depth of 18 inches or more below the adjacent finished grade, on moisture-conditioned and compacted engineered fill as described in this report. Footings should have a width of 18 inches or more. Spread footings should be reinforced in accordance with the recommendations of the structural engineer.

Footings may be designed using a net allowable bearing capacity of 2,000 pounds per square foot (psf) for static conditions. The allowable bearing capacity may be increased by one-third when considering loads of short duration such as wind or seismic forces. Total static settlement is estimated to be approximately 1 inch for sustained column and wall loads presumed to be not more than 100 kips and 18 kips per foot, respectively. The differential static settlement is estimated to be approximately ½ inch over a horizontal distance of 50 feet. Footing settlement due to static loads may be further evaluated using a modulus of subgrade reaction. Recommended values for the modulus of subgrade reaction in pounds per cubic inch (pci) are provided in Table 8. The designer may interpolate between the values in the table for intermediate footing widths. The values shown in Table 8 are acceptable for a length that is no greater than two times the width. In the event in which the length is significantly larger than the width, a geotechnical engineer should be consulted.

Table 8 – Footing Modulus of Subgrade Reaction

Footing	Footing Width				
	1 foot	2 feet	3 feet	4 feet	5 feet
Wall Footing	116 pci	58 pci	39 pci	29 pci	23 pci

A lateral bearing pressure of 250 psf per foot of depth up to 1,500 psf may be used to evaluate the resistance of footings to lateral loads. The recommended lateral bearing pressure is for level and gently sloping ground conditions where the ground slope adjacent to the foundation is 5 percent or less. The lateral bearing pressure should be neglected to a depth of 12 inches where the ground adjacent to the foundation is not covered by a slab or pavement. The lateral bearing

pressure may be increased by one-third when considering wind or seismic alternative basic load combinations. A friction coefficient of 0.35 may be assumed for evaluating frictional resistance to lateral loads.

9.4 Retaining Walls

Gravity or semi-gravity walls backfilled with imported granular or fine-grained fill and retaining up to 6 feet of soil above the wall footing may be designed for an active and at-rest equivalent fluid earth pressures of 90 and 100 psf per foot depth, respectively for undrained conditions with level backfill. If the backfill is drained, the wall footings may be designed for active and at-rest equivalent fluid earth pressures of 45 and 50 psf per foot depth, respectively. Where wall heights exceed 6 feet, seismic loading will also need to be considered. Retaining walls exceeding 6 feet in retained soil height should be designed for an additional seismic equivalent earth pressure of 30 psf per foot depth. Wall height should be evaluated as the vertical distance above the wall footing to the ground surface at the heel of the wall. Where footings are in close proximity to the back side of retaining walls, the base of the footing should be located below a plane extending up from the base of the retaining wall at an inclination of 1.5 horizontal to 1 vertical (1.5H:1V) to avoid applying a surcharge load on the wall.

9.5 Pavements and Flatwork

Recommendations for flexible and rigid pavements and exterior concrete flatwork are presented in the following sections. A design R-value of 19 was selected based on the type of material encountered in the borings. The pavement subgrade should be observed by the geotechnical engineer during grading to check the finish subgrade for consistency with the assumed condition. Subgrade soils should be prepared by scarifying the soils to a depth of 12 inches, moisture conditioned and compacted as discuss in Section 9.2.6. Prepared subgrade should be maintained in a moist (but not saturated) condition by the periodic sprinkling of water until such time as it is covered by placement of additional overlying fill. Subgrade that has been permitted to dry out and loosen or develop desiccation cracking, should be reprocessed including scarification, moisture conditioning and recompacting.

9.5.1 Asphalt Pavement

Aggregate base for pavement should be placed in lifts of no more than 8 inches in loose thickness and compacted per Section 9.2.6. Asphalt concrete should be placed and compacted in accordance with Caltrans Standard Specification and Construction Manual; asphalt concrete should be compacted to between 92 and 96 percent of the theoretical maximum specific gravity and density (Rice gravity – ASTM D 2041) of the material. Pavements should be sloped so that runoff is diverted to an appropriate collector (concrete gutter, swale, or area drain) to reduce the potential for ponding of water on the pavement. Concentration of runoff over asphalt pavement should be discouraged. Below is a table summarizing the recommended asphalt pavement sections based on the assumed TI and design R-value.

Table 9 – Asphalt Concrete Pavement Sections

Traffic Index	R-Value	Alternative 1	Alternative 2
3 (Non-vehicular Walkways)	19	3-1/4 inches AC	1-1/2 inches AC 4-1/4 inches AB
5 (Parking Lot)	19	6-1/2 inches AC	2-3/4 inches AC 8-1/4 inches AB
6 (Fire Lanes)	19	8 inches AC	3-1/4 inches AC 10-1/4 inches AB
8 (Truck Ramps & Roads)	19	11inches AC	4-3/4 inches AC 14-1/4 inches AB

Notes:
[1] AC is Type A, Dense-Graded Hot Mix Asphalt complying with Caltrans Standard Specification 39-2 (2018).
[2] AB is Class 2 Aggregate Base complying with Caltrans Standard Specification 26-1.02 (2018).

9.5.2 Exterior Flatwork

Pedestrian sidewalks, walkways, and other flatwork constructed of Portland cement concrete should consist of no less than 4 inches of concrete over 4 inches of aggregate base. The concrete thickness and aggregate base thickness should each be increased to 6 inches or more for flatwork subject to vehicular traffic and 8 inches or more for trash enclosures. Criteria for typical aggregate base are presented in Section 9.2.6.

Appropriate jointing of concrete flatwork can encourage cracks to form at joints, reducing the potential for crack development between joints. Joints should be laid out in a square pattern at consistent intervals. Contraction and construction joints should be detailed and constructed in accordance with the guidelines of ACI Committee 302. The ratio of lateral spacing between

contraction joints to the nominal thickness of the slab should not exceed 24 for jointed plain concrete. Contraction joints formed by premolded inserts, grooving plastic concrete, or saw-cutting at initial hardening, should extend to a depth equivalent to 25 percent of the slab thickness and 1 inch or more for thin slabs. The joint location and layout of new or reconstructed flatwork abutting existing flatwork should be consistent with joint location/layout of the existing flatwork.

Flatwork may be reinforced with distributed steel to reduce the potential for differential slab movement where cracking occurs. The distributed reinforcing steel should be terminated about 3 inches from contraction joints and should consist of No. 3 deformed bars at 18 inches on center, both ways, or with 6x6-D4/D4 welded wire fabric supplied as sheets (not rolls). Slabs reinforced with distributed steel should be 6 inches thick (or more) for No. 3 bar reinforcement and 5 inches thick (or more) for 6x6-D4/D4 reinforcement to provide adequate concrete cover for the steel. To reduce the potential for differential slab movement across joints, the distributed steel may be extended through the joints. This improvement will be balanced by a reduction in the functionality of the contraction joint to encourage crack formation at joints. Flatwork subject to impact from unloading of dumpsters should be reinforced with No. 4 deformed bars at 12 inches on center, both ways extending through contraction joints, if present. Masonry briquettes or plastic chairs should be used to maintain the position of the reinforcement in the upper half of the slab with 1½ inches of cover over the steel and 3 inches of cover under the steel. Root barriers adjacent to trees may be considered to reduce the potential for pavement heave from root growth.

9.6 Review of Construction Plans

The recommendations provided in this report are based on preliminary design information for the proposed construction. We recommend that a copy of the plans be provided to Ninyo & Moore for review before bidding to check the interpretation of our recommendations and that the designed improvements are consistent with our assumptions. It should be noted that, upon review of these documents, some recommendations presented in this report might be revised or modified to meet the project requirements.

9.7 Construction Observation and Testing

The recommendations provided in this report are based on subsurface conditions encountered in discrete exploratory borings. During construction, the geotechnical engineer or his representative in the field should be allowed to check the exposed subsurface conditions. During construction, the geotechnical engineer or his/her representative should be allowed to:

- Check for unsuitable materials and observe foundation excavations.
- Observe preparation and compaction of subgrade.
- Check and test imported materials prior to import to the project site.
- Observe placement and compaction of fill.
- Perform field density tests to evaluate fill and subgrade compaction.

The recommendations provided in this report assume that Ninyo & Moore will be retained as the geotechnical consultant during the construction phase of the project. If another geotechnical consultant is selected, we request that the selected consultant provide a letter to the architect and the owner (with a copy to Ninyo & Moore) indicating that they fully understand Ninyo & Moore's recommendations, and that they are in full agreement with the recommendations contained in this report. Ninyo & Moore cannot assume responsibility for aspects of construction for which we have not been given an opportunity to observe/test.

10 LIMITATIONS

The field evaluation, laboratory testing, geotechnical analyses, and assessment of geologic hazards presented in this report have been conducted in general accordance with current practice and the standard of care exercised by geotechnical consultants performing similar tasks in the project area at the time this report was prepared. No warranty, expressed or implied, is made regarding the conclusions, recommendations, and opinions presented in this report. There is no evaluation detailed enough to reveal every subsurface condition. Variations may exist, and conditions not observed or described in this report may be encountered during construction. Uncertainties relative to subsurface conditions can be reduced through additional subsurface exploration. Additional subsurface evaluation will be performed upon request. Please also note that our evaluation was limited to assessment of the geotechnical aspects of the project, and did not include evaluation of structural issues, environmental concerns, or the presence of hazardous materials.

This document is intended to be used only in its entirety. No portion of the document, by itself, is designed to completely represent any aspect of the project described herein. Ninyo & Moore should be contacted if the reader requires additional information or has questions regarding the content, interpretations presented, or completeness of this document.

This report is intended for design purposes only. It does not provide sufficient data to prepare an accurate bid by contractors. It is suggested that the bidders and their geotechnical consultant perform an independent evaluation of the subsurface conditions in the project areas. The independent evaluations may include, but not be limited to, review of other geotechnical reports prepared for the adjacent areas, site reconnaissance, and additional exploration and laboratory testing.

Our conclusions, recommendations, and opinions are based on an analysis of the observed site conditions. If geotechnical conditions different from those described in this report are encountered, our office should be notified and additional recommendations will be provided, as appropriate. It should be understood that the conditions of a site could change with time as a result of natural processes or the activities of man at the subject site or nearby sites. In addition, changes to the applicable laws, regulations, codes, and standards of practice may occur due to government action or the broadening of knowledge. The findings of this report may, therefore, be invalidated over time, in part or in whole, by changes over which Ninyo & Moore has no control.

This report is intended exclusively for use by the client. Any use or reuse of the findings, conclusions, and/or recommendations of this report by parties other than the client is undertaken at said parties' sole risk.

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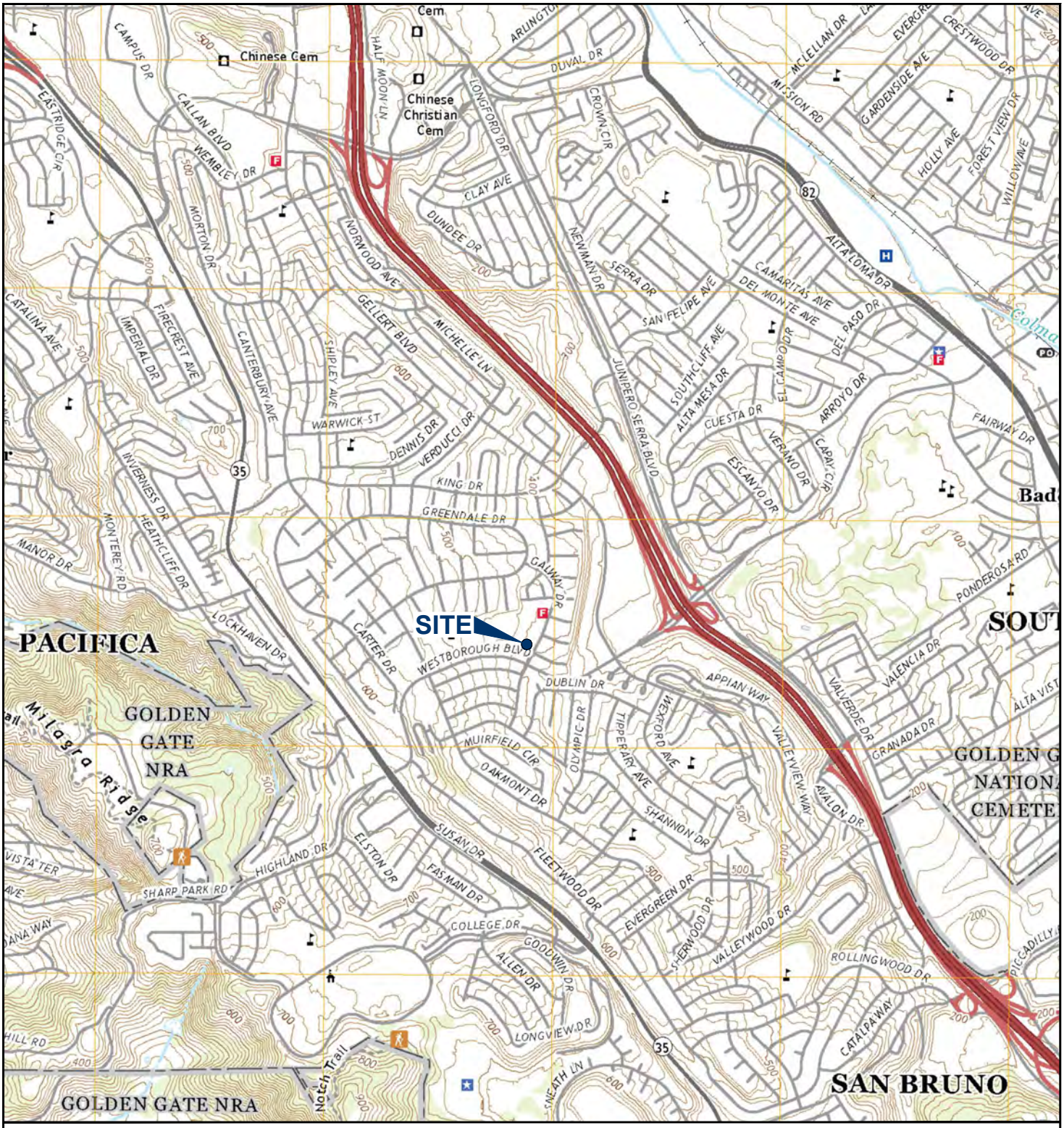
FIGURES



NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE I REFERENCE: USGS, 2018

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FIGURE 1

SITE LOCATION

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA
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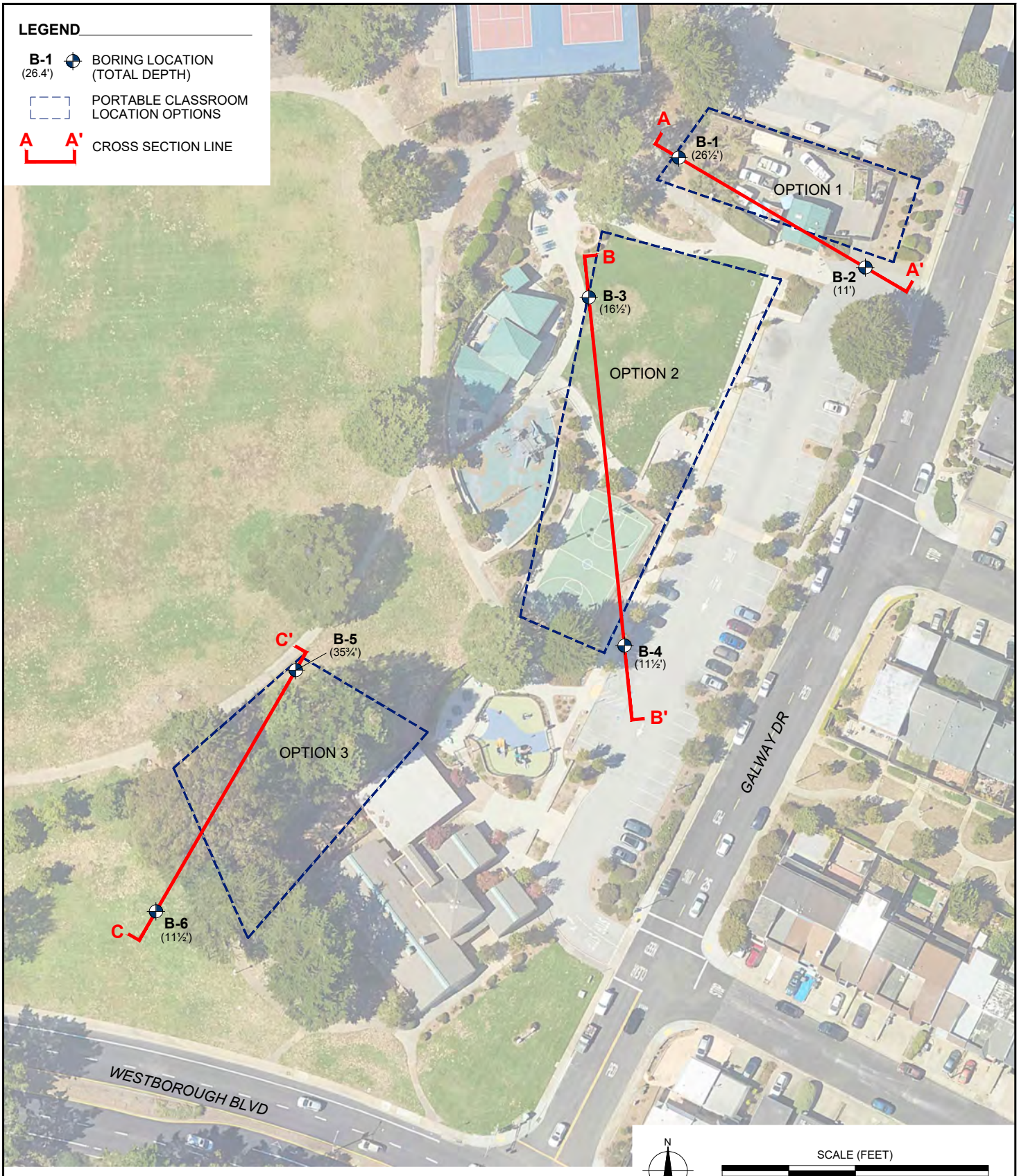
Ninyo & Moore
Geotechnical & Environmental Sciences Consultants



NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE I REFERENCE: GOOGLE EARTH, 2024

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FIGURE 2

Ninyo & Moore
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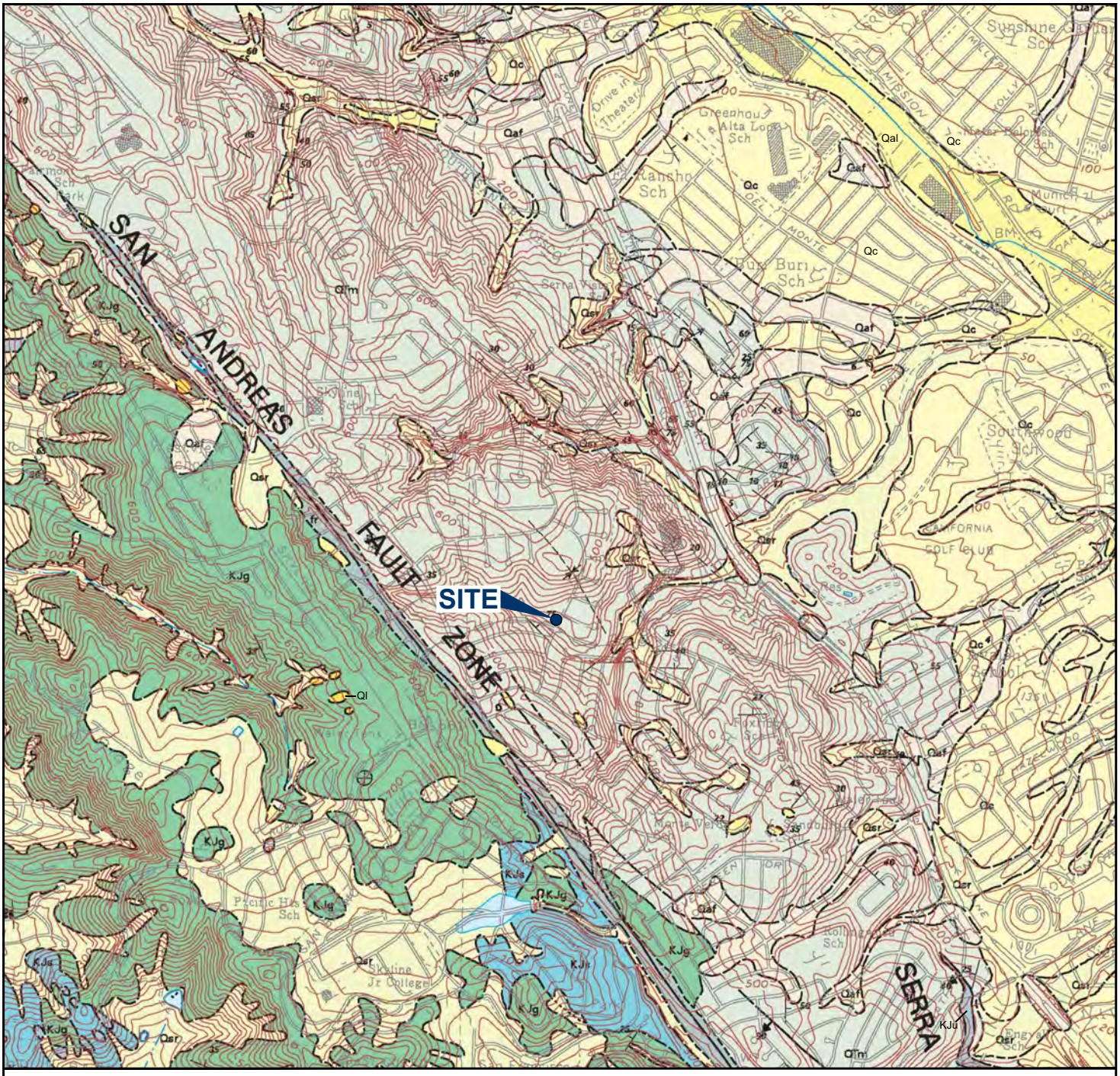
SITE PLAN

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

404831001 I 08/24



LEGEND

Qaf	ARTIFICIAL FILL (HOLOCENE)	fr	FAULT ROCKS (HOLOCENE/ PLEISTOCENE)	KJs	FRANCISCAN COMPLEX: SANDSTONE & SHALE (CRETACEOUS/JURASSIC)		THRUST FAULT
Ql	LANDSLIDE DEPOSITS (HOLOCENE)	Qc	COLMA FORMATION (PLEISTOCENE)	KJg	FRANCISCAN COMPLEX: GREENSTONE (CRETACEOUS/JURASSIC)		FAULT
Qal	ALLUVIUM (HOLOCENE)	QTm	MERCED FORMATION (PLEISTOCENE/PLIOCENE)	KJu	FRANCISCAN COMPLEX: SHEARED ROCKS (CRETACEOUS/JURASSIC)		GEOLOGIC CONTACT
Qsr	SLOPE DEBRIS & RAVINE FILL (HOLOCENE/ PLEISTOCENE)						STRIKE AND DIP OF BEDDING

NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE I REFERENCE: USGS, BONILLA, 1998

N

SCALE (FEET)
0 2,000 4,000

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FIGURE 3

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REGIONAL GEOLOGY

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

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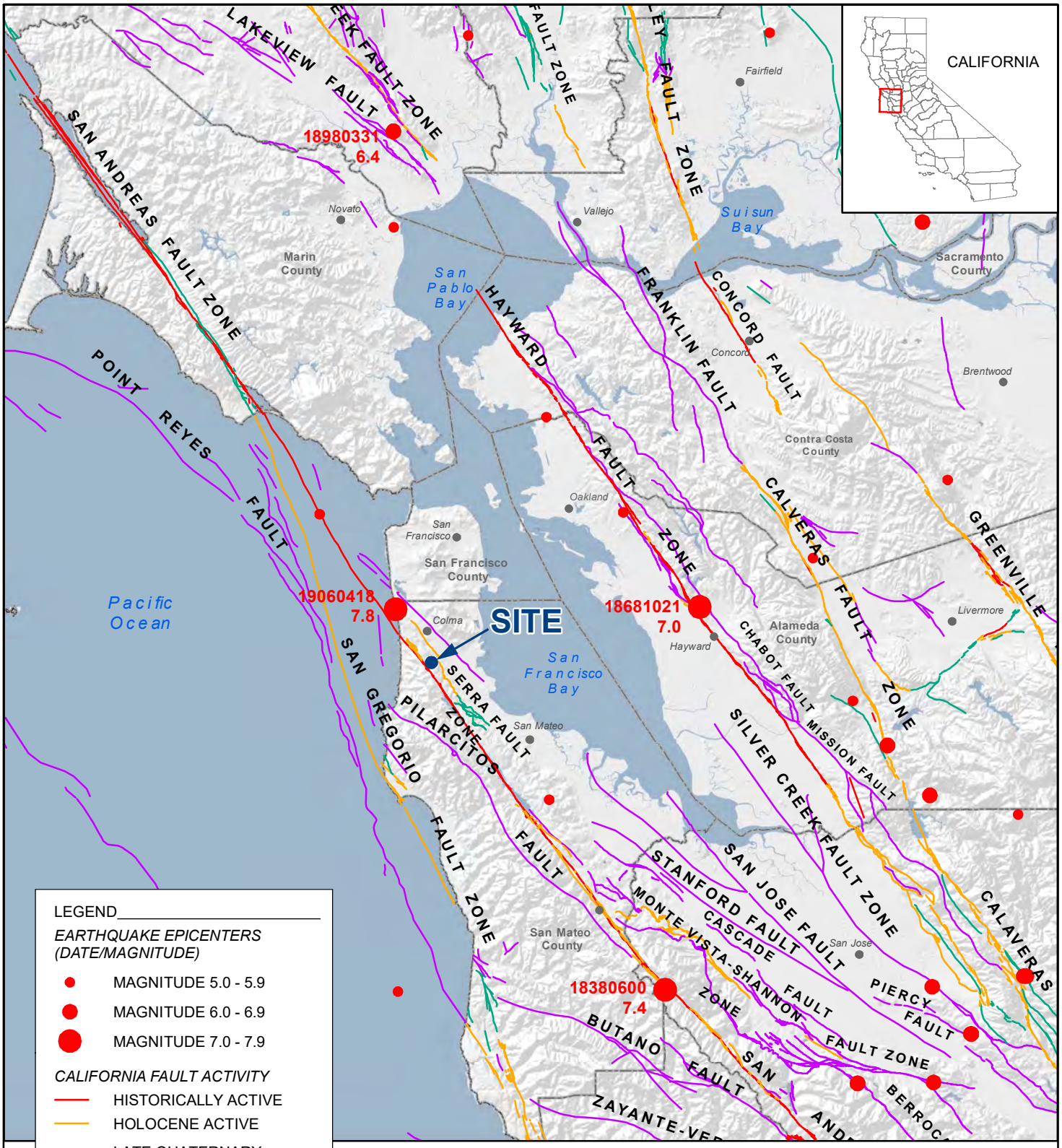

NOTE: DIRECTIONS, DIMENSIONS, AND LOCATIONS ARE APPROXIMATE

SOURCES: CALIFORNIA GEOLOGICAL SURVEY, 2010, FAULT ACTIVITY MAP OF CALIFORNIA; CALIFORNIA GEOLOGICAL SURVEY, 2000, MAP SHEET MS 49

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FIGURE 4

FAULT LOCATIONS AND EARTHQUAKE EPICENTERS

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA
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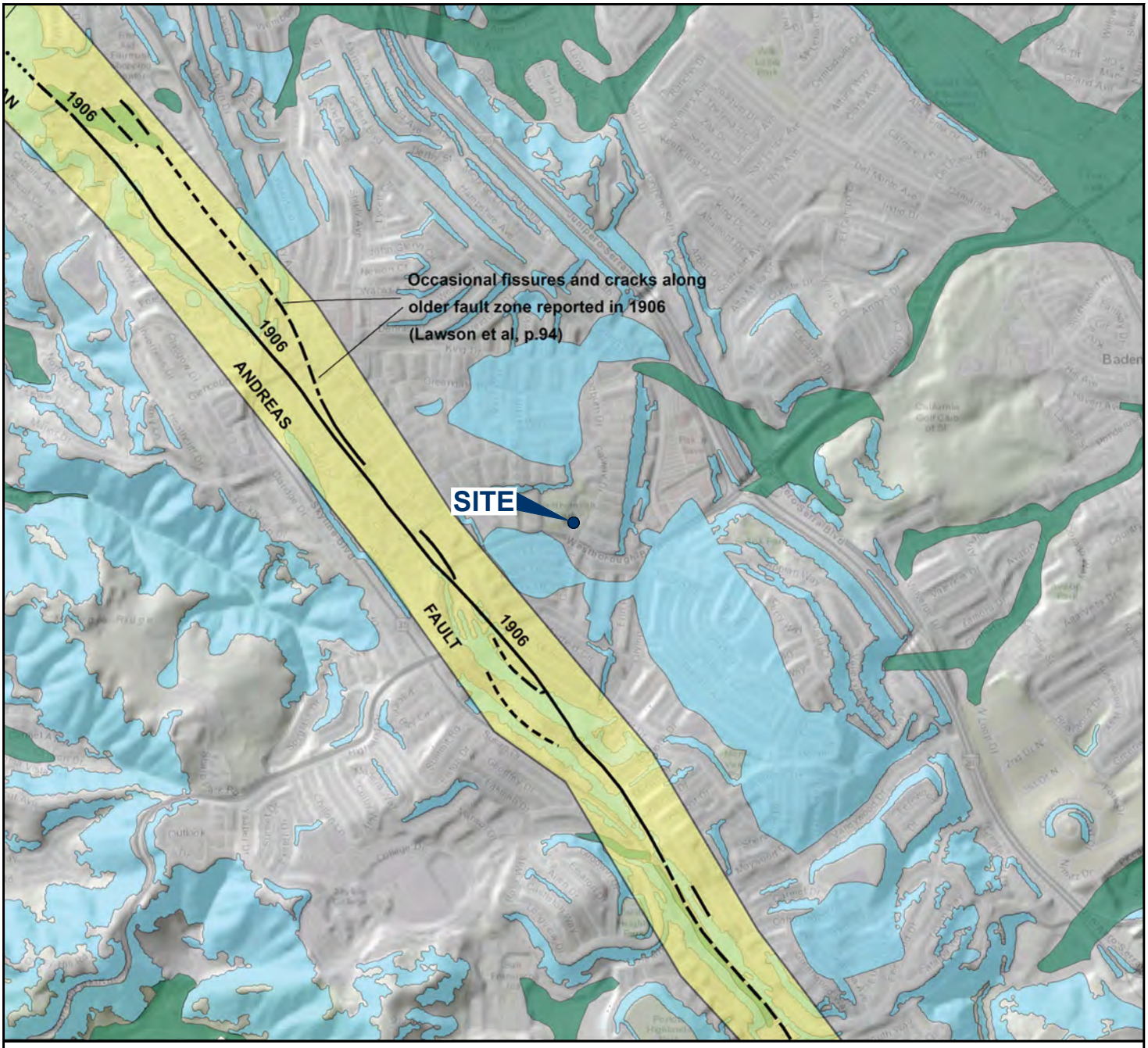

LEGEND

EARTHQUAKE FAULT ZONES:
Zone boundaries are delineated by straight-line segments; the boundaries define the zone encompassing active faults that constitute a potential hazard to structures from surface faulting or fault creep such that avoidance as described in Public Resources Code Section 2621.5(a) would be required.

OVERLAP OF EARTHQUAKE FAULT ZONE AND LIQUEFACTION ZONE:
Areas that are covered by both Earthquake Fault Zone and Liquefaction Zone.

OVERLAP OF EARTHQUAKE FAULT ZONE AND EARTHQUAKE-INDUCED LANDSLIDE ZONE:
Areas that are covered by both Earthquake Fault Zone and Earthquake-Induced Landslide Zone.

LIQUEFACTION ZONES:
Areas where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

EARTHQUAKE-INDUCED LANDSLIDE ZONES:
Areas where previous occurrence of landslide movement, or local topographic, geological, geotechnical and subsurface water conditions indicate a potential for permanent ground displacements such that mitigation as defined in Public Resources Code Section 2693(c) would be required.

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SCALE (FEET)
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NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE I REFERENCE: CGS, 1982, 2021

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FIGURE 5

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Geotechnical & Environmental Sciences Consultants

SEISMIC HAZARD ZONES

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

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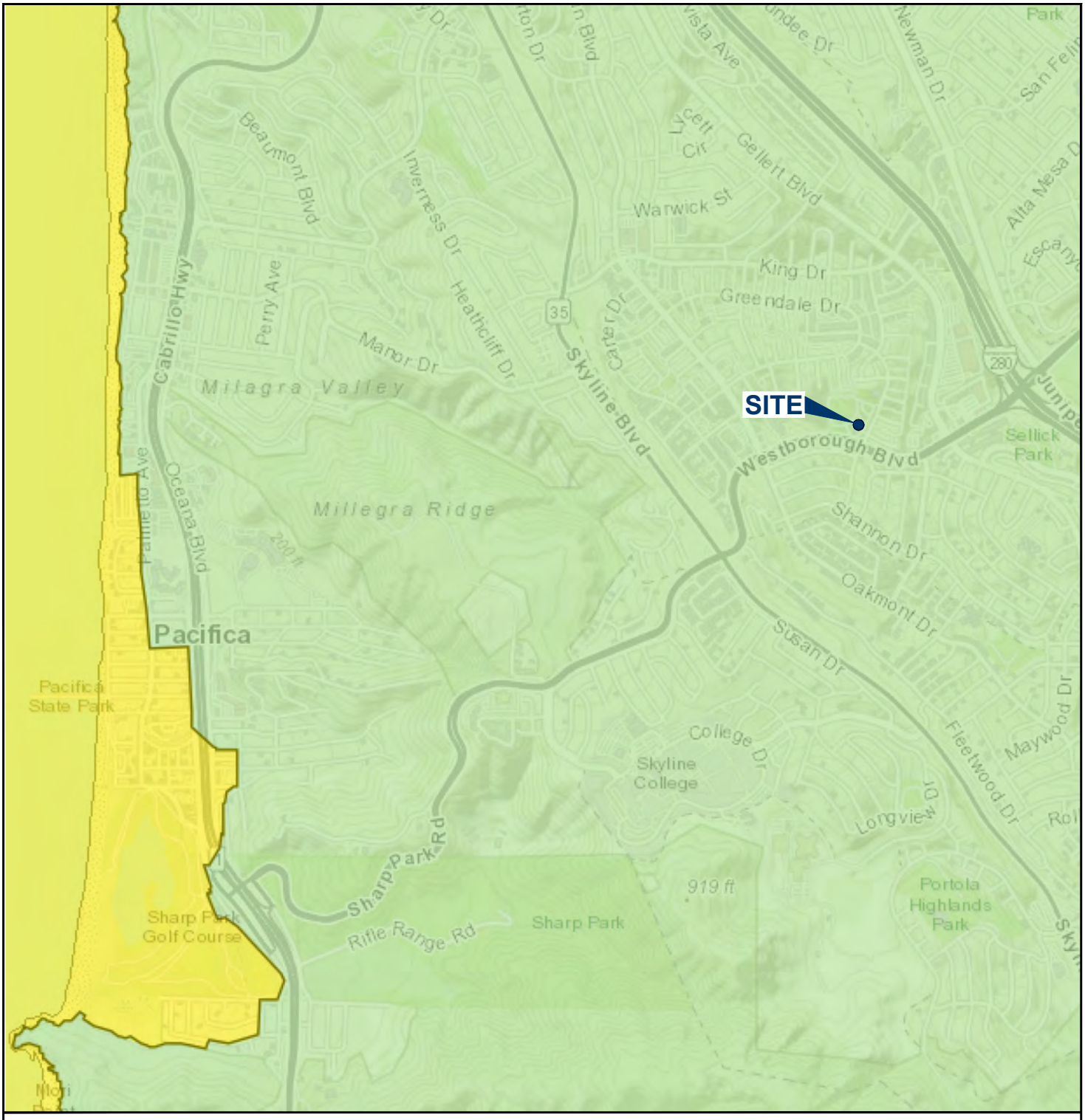

LEGEND

CALIFORNIA TSUNAMI HAZARD AREA:

TSUNAMI HAZARD AREA

OUTSIDE OF TSUNAMI HAZARD AREA

NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE I REFERENCE: CGS, 2024

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SCALE (FEET)

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FIGURE 6

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TSUNAMI INUNDATION MAP

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

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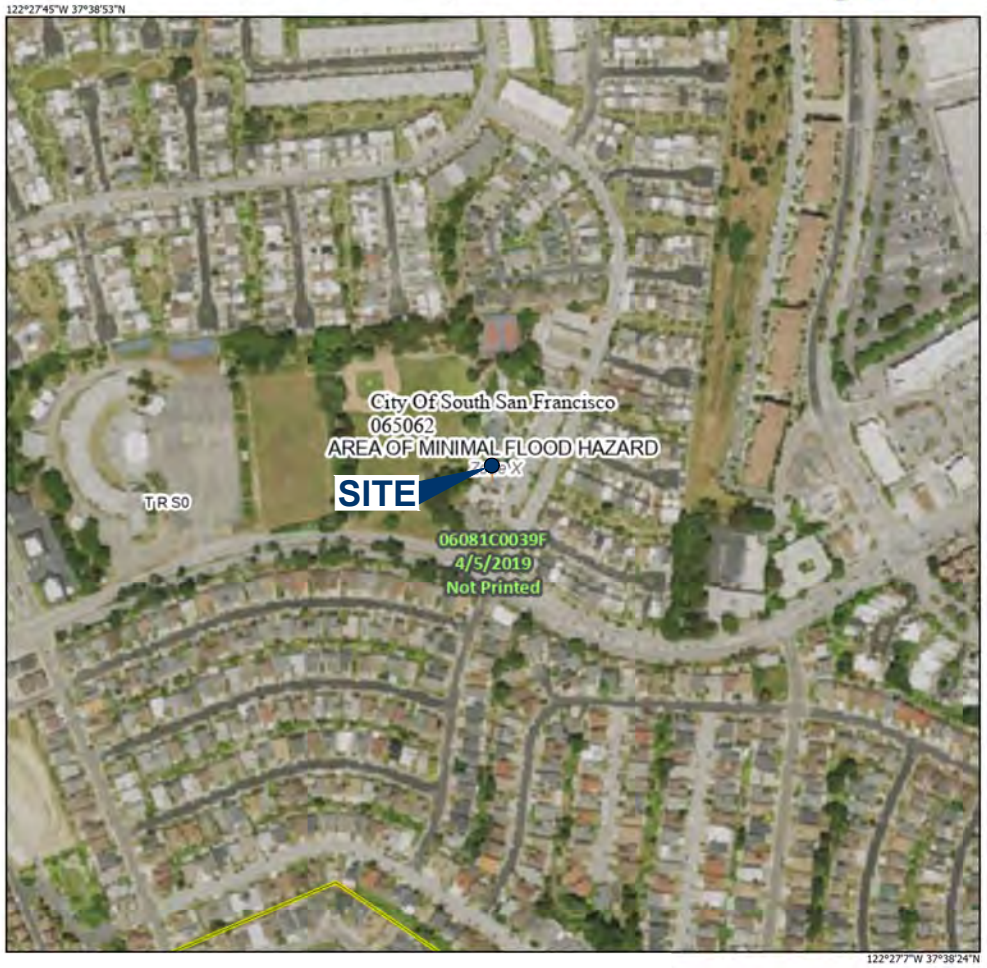
National Flood Hazard Layer FIRMette



Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

- SPECIAL FLOOD HAZARD AREAS: Without Base Flood Elevation (BFE) Zone A, V, A99; With BFE or Depth Zone AE, AO, AH, VE, AR; Regulatory Floodway
- OTHER AREAS OF FLOOD HAZARD: 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X; Future Conditions 1% Annual Chance Flood Hazard Zone X; Area with Reduced Flood Risk due to Levee. See Notes. Zone X; Area with Flood Risk due to Levee Zone D
- OTHER AREAS: NO SCREEN Area of Minimal Flood Hazard Zone X; Effective LOMRs; Area of Undetermined Flood Hazard Zone D
- GENERAL STRUCTURES: Channel, Culvert, or Storm Sewer; Levee, Dike, or Floodwall
- OTHER FEATURES: 20.2 / 17.5 Cross Sections with 1% Annual Chance; Water Surface Elevation; Coastal Transect; Base Flood Elevation Line (BFE); Limit of Study; Jurisdiction Boundary; Coastal Transect Baseline; Profile Baseline; Hydrographic Feature
- MAP PANELS: Digital Data Available; No Digital Data Available; Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE I REFERENCE: FEMA, 2024

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SCALE (FEET)

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FIGURE 7

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Geotechnical & Environmental Sciences Consultants

FEMA FLOOD MAP

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

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APPENDIX A

Boring Logs

APPENDIX A

Field Procedure for the Collection of Disturbed Samples

Disturbed soil samples were obtained in the field using the following methods.

Bulk Sample

Bulk samples of representative earth materials were obtained from the borings. The samples were bagged and transported to the laboratory for testing.

The Standard Penetration Test (SPT) Sampler

Disturbed drive samples of earth materials were obtained by means of a Standard Penetration Test sampler. The sampler is composed of a split barrel with an external diameter of 2 inches and an unlined internal diameter of 1-3/8 inches. The sampler was driven into the ground 18 inches with a 140-pound hammer falling freely from a height of 30 inches in general accordance with ASTM D 1586. The blow counts were recorded for every 6 inches of penetration; the blow counts reported on the logs are those for the last 12 inches of penetration. Soil samples were observed and removed from the sampler, bagged, sealed and transported to the laboratory for testing.

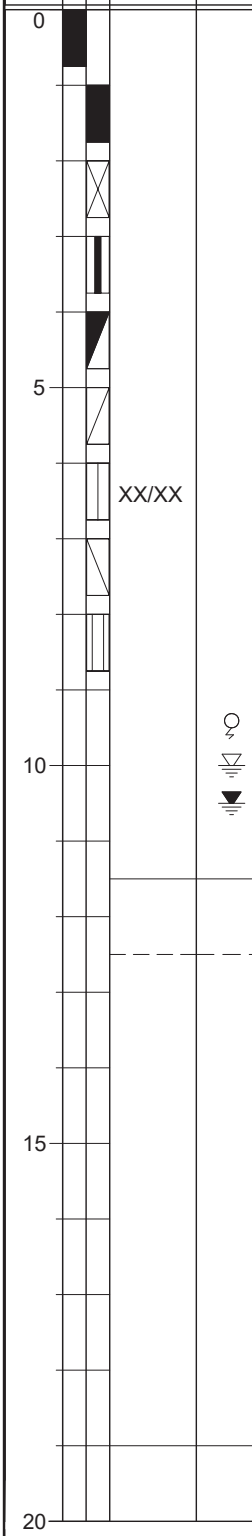
Field Procedure for the Collection of Relatively Undisturbed Samples

Relatively undisturbed soil samples were obtained in the field using the following method.

The Modified Split-Barrel Drive Sampler

The sampler, with an external diameter of 3.0 inches, was lined with 6-inch long, thin brass liners with an inside diameter of approximately 2.4 inches. The sample barrel was driven into the ground with the weight of a hammer in general accordance with ASTM D 3550. The driving weight was permitted to fall freely. The approximate length of the fall, the weight of the hammer, and the number of blows per foot of driving are presented on the boring log as an index to the relative resistance of the materials sampled. The samples were removed from the sample barrel in the brass liners, sealed, and transported to the laboratory for testing.

BORING LOG EXPLANATION SHEET



Bulk sample.

Modified split-barrel drive sampler.

No recovery with modified split-barrel drive sampler.

Sample retained by others.

Standard Penetration Test (SPT).

No recovery with a SPT.

Shelby tube sample. Distance pushed in inches/length of sample recovered in inches.

No recovery with Shelby tube sampler.

Continuous Push Sample.

Seepage.

Groundwater encountered during drilling.

Groundwater measured after drilling.

SM

MAJOR MATERIAL TYPE (SOIL):

Solid line denotes unit change.

CL

Dashed line denotes material change.

Attitudes: Strike/Dip
b: Bedding
c: Contact
j: Joint
f: Fracture
F: Fault
cs: Clay Seam
s: Shear
bss: Basal Slide Surface
sf: Shear Fracture
sz: Shear Zone
sbs: Shear Bedding Surface

The total depth line is a solid line that is drawn at the bottom of the boring.

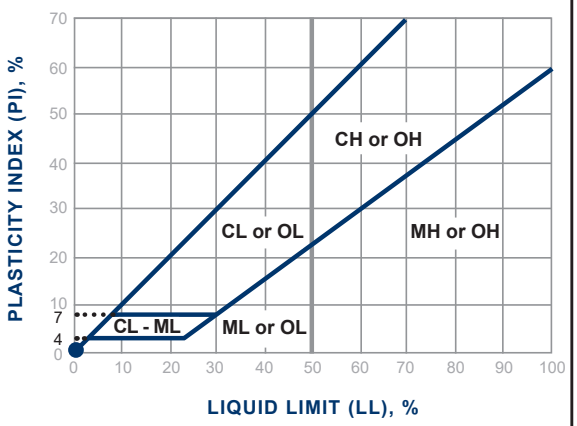
Soil Classification Chart Per ASTM D 2488

Primary Divisions			Secondary Divisions	
			Group Symbol	Group Name
COARSE-GRAINED SOILS more than 50% retained on No. 200 sieve	**GRAVEL** more than 50% of coarse fraction retained on No. 4 sieve	CLEAN GRAVEL less than 5% fines	GW	well-graded GRAVEL
			GP	poorly graded GRAVEL
		GRAVEL with DUAL CLASSIFICATIONS 5% to 12% fines	GW-GM	well-graded GRAVEL with silt
			GP-GM	poorly graded GRAVEL with silt
			GW-GC	well-graded GRAVEL with clay
			GP-GC	poorly graded GRAVEL with
		GRAVEL with FINES more than 12% fines	GM	silty GRAVEL
			GC	clayey GRAVEL
			GC-GM	silty, clayey GRAVEL
	SAND 50% or more of coarse fraction passes No. 4 sieve	CLEAN SAND less than 5% fines	SW	well-graded SAND
			SP	poorly graded SAND
		SAND with DUAL CLASSIFICATIONS 5% to 12% fines	SW-SM	well-graded SAND with silt
			SP-SM	poorly graded SAND with silt
			SW-SC	well-graded SAND with clay
			SP-SC	poorly graded SAND with clay
		SAND with FINES more than 12% fines	SM	silty SAND
			SC	clayey SAND
			SC-SM	silty, clayey SAND
FINE-GRAINED SOILS 50% or more passes No. 200 sieve	**SILT and CLAY** liquid limit less than 50%	INORGANIC	CL	lean CLAY
			ML	SILT
			CL-ML	silty CLAY
		ORGANIC	OL (PI > 4)	organic CLAY
			OL (PI < 4)	organic SILT
	SILT and CLAY liquid limit 50% or more	INORGANIC	CH	fat CLAY
			MH	elastic SILT
		ORGANIC	OH (plots on or above "A"-line)	organic CLAY
			OH (plots below "A"-line)	organic SILT
	Highly Organic Soils		PT	Peat

Grain Size

Description		Sieve Size	Grain Size	Approximate Size
Boulders		> 12"	> 12"	Larger than basketball-sized
Cobbles		3 - 12"	3 - 12"	Fist-sized to basketball-sized
Gravel	Coarse	3/4 - 3"	3/4 - 3"	Thumb-sized to fist-sized
	Fine	#4 - 3/4"	0.19 - 0.75"	Pea-sized to thumb-sized
Sand	Coarse	#10 - #4	0.079 - 0.19"	Rock-salt-sized to pea-sized
	Medium	#40 - #10	0.017 - 0.079"	Sugar-sized to rock-salt-sized
	Fine	#200 - #40	0.0029 - 0.017"	Flour-sized to sugar-sized
Fines		Passing #200	< 0.0029"	Flour-sized and smaller

Plasticity Chart



Apparent Density - Coarse-Grained Soil

Apparent Density	Spooling Cable or Cathead		Automatic Trip Hammer	
	SPT (blows/foot)	Modified Split Barrel (blows/foot)	SPT (blows/foot)	Modified Split Barrel (blows/foot)
Very Loose	≤ 4	≤ 8	≤ 3	≤ 5
Loose	5 - 10	9 - 21	4 - 7	6 - 14
Medium Dense	11 - 30	22 - 63	8 - 20	15 - 42
Dense	31 - 50	64 - 105	21 - 33	43 - 70
Very Dense	> 50	> 105	> 33	> 70

Consistency - Fine-Grained Soil

Consis-tency	Spooling Cable or Cathead		Automatic Trip Hammer	
	SPT (blows/foot)	Modified Split Barrel (blows/foot)	SPT (blows/foot)	Modified Split Barrel (blows/foot)
Very Soft	< 2	< 3	< 1	< 2
Soft	2 - 4	3 - 5	1 - 3	2 - 3
Firm	5 - 8	6 - 10	4 - 5	4 - 6
Stiff	9 - 15	11 - 20	6 - 10	7 - 13
Very Stiff	16 - 30	21 - 39	11 - 20	14 - 26
Hard	> 30	> 39	> 20	> 26

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

USCS METHOD OF SOIL CLASSIFICATION

DATE DRILLED 7/8/2024 BORING NO. B-1

GROUND ELEVATION 425' ± MSL SHEET 1 OF 1

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0						ML	MERCED FORMATION: Olive brown and gray, moist, very stiff, sandy SILT; scattered well rounded gravel.
		25	17.5	111.6			
		52					Hard.
10		50/6" 50/4"					Gray.
		68					
20		50/5" 93/11"					
		96/10"	15.2				
30							Total depth = 26.4 feet. Backfilled with neat cement grout shortly after drilling. Notes: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report. The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents (Google, 2024).
40							

DATE DRILLED 7/8/2024 BORING NO. B-2

GROUND ELEVATION 418' ± MSL SHEET 1 OF 1

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0							ASPHALT CONCRETE: Approximately 3 inches thick.
							AGGREGATE BASE: Approximately 6 inches thick.
		50/5"				CL-ML	MERCED FORMATION:
		82/11"					Olive brown, moist, hard, silty CLAY.
		50/5"	13.4	101.2			
		50/5.5"					
10		50/5"					
							Total depth = 11 feet.
							Backfilled with neat cement grout and patched with fast-setting concrete mix shortly after drilling.
							Notes: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report.
20							The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents (Google, 2024).
30							
40							

DATE DRILLED 7/8/2024 BORING NO. B-3

GROUND ELEVATION 423' ± MSL SHEET 1 OF 1

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0						ML	MERCED FORMATION: Dark olive, moist, very stiff, sandy SILT.
		22					
		26	17.4	148.2			Dark yellowish brown.
10		90/10"	13.2 12.9	116.0 118.5			Hard.
		47					
							Total depth = 16.5 feet.
							Backfilled with neat cement grout shortly after drilling.
20							Notes: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report.
							The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents (Google, 2024).
30							
40							

DATE DRILLED 7/8/2024 BORING NO. B-4

GROUND ELEVATION 413' ± MSL SHEET 1 OF 1

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0							ASPHALT CONCRETE: Approximately 3.5 inches thick.
						ML	AGGREGATE BASE: Approximately 5 inches thick.
		20	24.5	99.5			FILL: Dark olive, gray and brown, moist, very stiff, sandy SILT.
		15					
10		40				CL	Light brown and dark brown, moist, hard, lean CLAY.
20							
30							
40							

Total depth = 11.5 feet.

Backfilled with neat cement grout and patched with fast-setting concrete mix shortly after drilling.

Notes:
Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report.

The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents (Google, 2024).

DATE DRILLED 7/8/2024 BORING NO. B-5

GROUND ELEVATION 433' ± MSL SHEET 1 OF 2

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0						CL	FILL: Brown, moist, stiff, sandy lean CLAY.
		11					
		12	24.2	99.1			
10		80/11"	18.9	104.4		ML	MERCED FORMATION: Yellowish brown and gray, moist, hard, sandy SILT.
		50/5"	18.8	106.8			
20		50/3"	17.4	95.4			
		97/10"					
30		83/10"					
		50/3"	17.8				
							Total depth = 35.8 feet. Backfilled with neat cement grout shortly after drilling.
40							

FIGURE A- 5

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA
404831001 | 08/24

DATE DRILLED 7/8/2024 BORING NO. B-5

GROUND ELEVATION 433' ± MSL SHEET 2 OF 2

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES Bulk	SAMPLES Driven	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
40								Notes: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report. The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents (Google, 2024).
50								
60								
70								
80								

DATE DRILLED 7/8/2024 BORING NO. B-6

GROUND ELEVATION 428' ± MSL SHEET 1 OF 1

METHOD OF DRILLING 4" Solid-Stem Auger, CME-75 (Hanlon Drilling)

DRIVE WEIGHT 140 lbs (automatic) DROP 30 inches

SAMPLED BY SSA LOGGED BY SSA REVIEWED BY TBG/ARD

DEPTH (feet)	SAMPLES (Bulk / Driven)	BLOWS/FOOT	MOISTURE (%)	DRY DENSITY (PCF)	SYMBOL	CLASSIFICATION U.S.C.S.	DESCRIPTION/INTERPRETATION
0						ML	FILL: Olive brown, dark brown, gray and brown, moist, very stiff, sandy SILT.
		14					
		25	15.2	109.7			
10		35				CL	Dark brown, black and gray, moist, hard, sandy lean clay.
20							Total depth = 11.5 feet. Backfilled with neat cement grout shortly after drilling. Notes: Groundwater, though not encountered at the time of drilling, may rise to a higher level due to seasonal variations in precipitation and several other factors as discussed in the report. The ground elevation shown above is an estimation only. It is based on our interpretations of published maps and other documents reviewed for the purposes of this evaluation. It is not sufficiently accurate for preparing construction bids and design documents (Google, 2024).
30							
40							

APPENDIX B

Laboratory Testing

APPENDIX B

LABORATORY TESTING

Classification
Soils were visually and texturally classified in accordance with the Unified Soil Classification System (USCS) in general accordance with ASTM D 2488-00. Soil classifications are indicated on the logs of the exploratory borings in Appendix B.

In-Place Moisture and Density Tests
The moisture content and dry density of relatively undisturbed samples obtained from the exploratory borings were evaluated in general accordance with ASTM D 2937-04. The test results are presented on the logs of the exploratory borings in Appendix A.

200 Wash Analysis
An evaluation of the percentage of particles finer than the No. 200 sieve in a selected sample was performed in accordance with ASTM D 1140. The test results are presented on Figure B-1.

Gradation Analysis
A gradation analysis test was performed on a selected representative soil sample in general accordance with ASTM D 422. The grain-size distribution curve is shown on Figures B-2 through B-4. These test results were utilized in evaluating the soil classifications in accordance with the USCS.

Atterberg Limits
Tests were performed on a selected sample to evaluate the liquid limit, plastic limit, and plasticity index in accordance with ASTM D 4318. These test results were used to evaluate the soil classification in accordance with the USCS. The test results and classifications are shown on Figure B-5.

Expansion Index
The expansion index of a selected material was evaluated in general accordance with ASTM D 4829. The specimen was molded under a specified compactive energy at approximately 50 percent saturation (plus or minus 1 percent). The prepared 1-inch thick by 4-inch diameter specimen was loaded with a surcharge of 144 pounds per square foot and inundated with tap water. Readings of volumetric swell were made for a period of 24 hours. The test results are presented on Figure B-6.

Unconsolidated Undrained Triaxial Compression Test
A triaxial compression test was performed on a selected relatively undisturbed sample in general accordance with ASTM D 2850. The test results are shown on Figure B-7.

R-Value
The resistance value, or R-value, for site soils was evaluated in general accordance with California Test (CT) 301. Samples were prepared and evaluated for exudation pressure and expansion pressure. The equilibrium R-value is reported as the lesser or more conservative of the two calculated results. The test results are shown on Figure B-8.

SAMPLE LOCATION	SAMPLE DEPTH (ft)	DESCRIPTION	PERCENT PASSING NO. 4	PERCENT PASSING NO. 200	USCS (TOTAL SAMPLE)
B-3	5.5 - 6.0	sandy SILT	96	56	ML
B-5	3.0 - 3.5	sandy lean CLAY	100	80	CL
B-6	2.5 - 3.0	sandy SILT	100	75	ML

PERFORMED IN ACCORDANCE WITH 1140

FIGURE B-1

NO. 200 SIEVE ANALYSIS TEST RESULTS

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA

404831001 | 08/24

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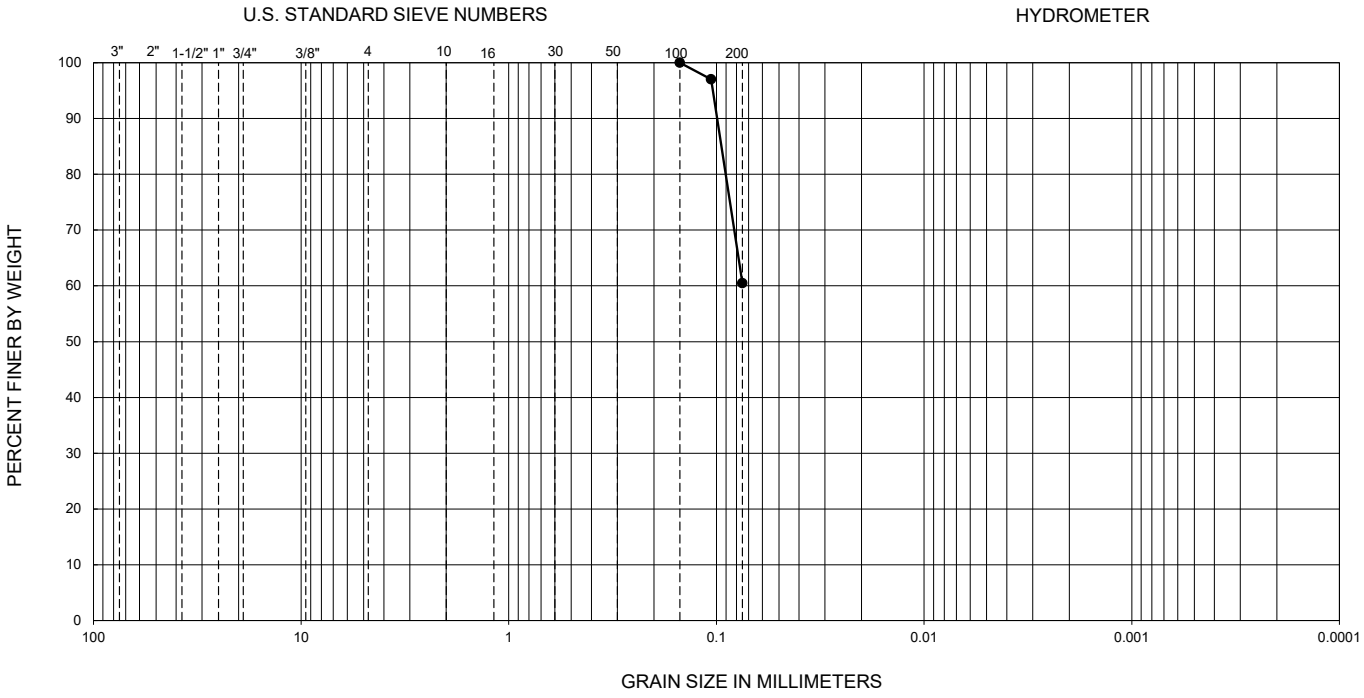
Geotechnical & Environmental Sciences Consultants

GRAVEL		SAND			FINES	
Coarse	Fine	Coarse	Medium	Fine	SILT	CLAY



Symbol	Sample Location	Depth (ft)	Liquid Limit	Plastic Limit	Plasticity Index	D_{10}	D_{30}	D_{60}	C_u	C_c	Passing No. 200 (percent)	USCS
●	B-1	10.0 - 10.5	--	--	--	--	--	0.07	--	--	61	ML

PERFORMED IN ACCORDANCE WITH ASTM D 422 / D6913

Soak Time: 2.0

Group Name: sandy SILT

% Gravel 0

% Sand 40

% Fines 61

FIGURE B-2

GRADATION TEST RESULTS

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA

404831001 | 08/24

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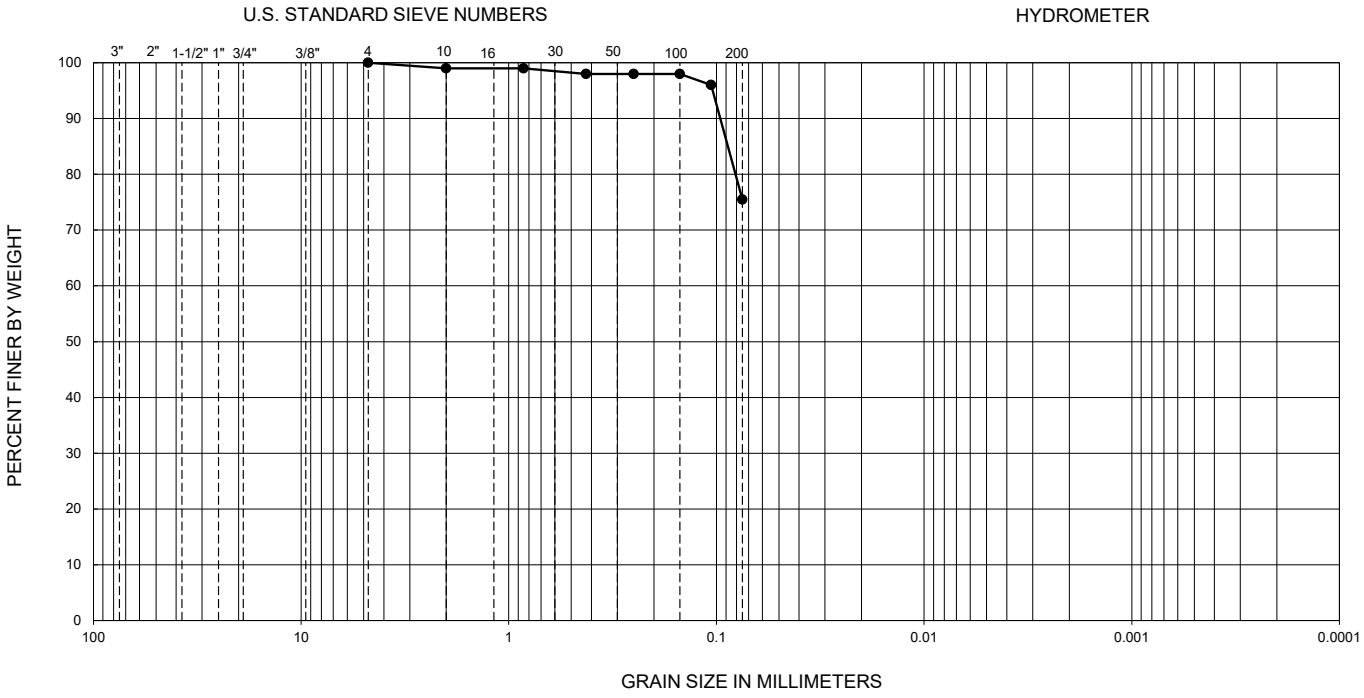
Geotechnical & Environmental Sciences Consultants

GRAVEL		SAND			FINES	
Coarse	Fine	Coarse	Medium	Fine	SILT	CLAY



Symbol	Sample Location	Depth (ft)	Liquid Limit	Plastic Limit	Plasticity Index	D_{10}	D_{30}	D_{60}	C_u	C_c	Passing No. 200 (percent)	USCS
●	B-1	15.0 - 16.5	--	--	--	--	--	0.06	--	--	75	ML

PERFORMED IN ACCORDANCE WITH ASTM D 422 / D6913

Soak Time: 2.1

Group Name: sandy SILT

% Gravel 0

% Sand 25

% Fines 75

FIGURE B-3

GRADATION TEST RESULTS

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA

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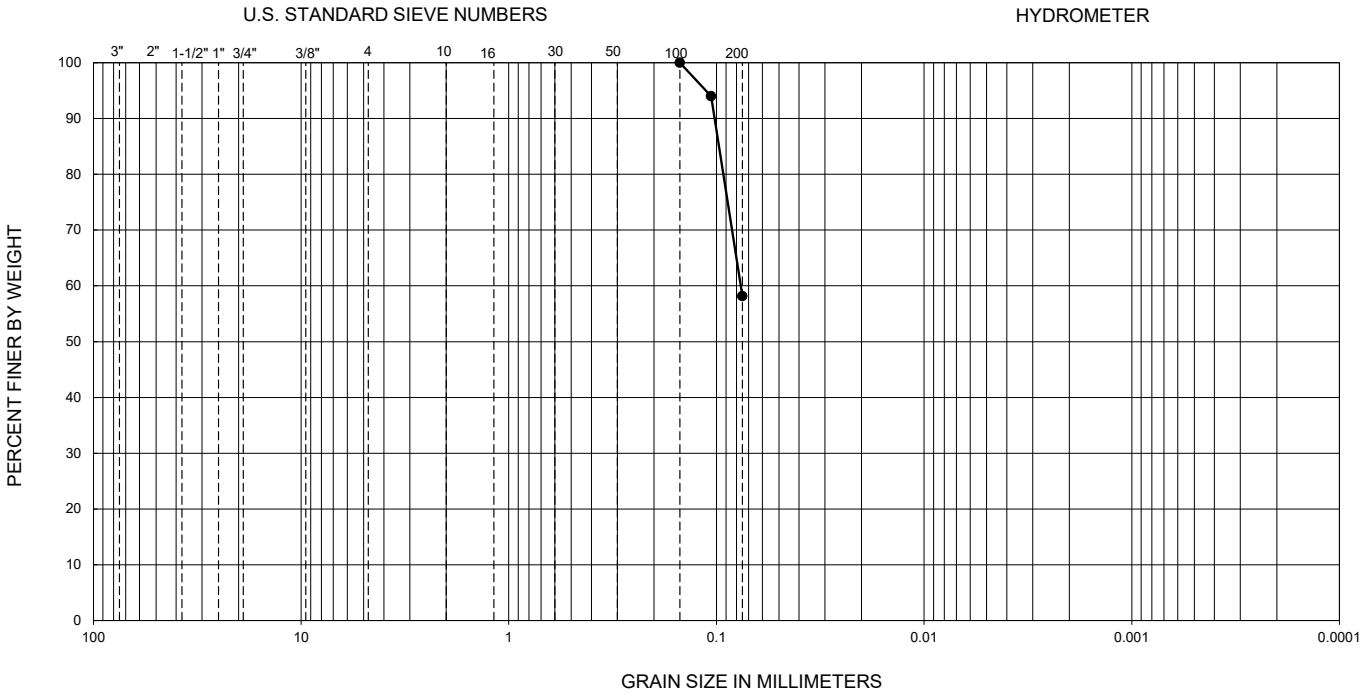
GRAVEL		SAND			FINES	
Coarse	Fine	Coarse	Medium	Fine	SILT	CLAY



Symbol	Sample Location	Depth (ft)	Liquid Limit	Plastic Limit	Plasticity Index	D_{10}	D_{30}	D_{60}	C_u	C_c	Passing No. 200 (percent)	USCS
●	B-2	2.5 - 3.0	--	--	--	--	--	0.08	--	--	58	CL-ML

PERFORMED IN ACCORDANCE WITH ASTM D 422 / D6913

Soak Time: 2.2

Group Name: silty CLAY

% Gravel 0

% Sand 42

% Fines 58

FIGURE B-4

GRADATION TEST RESULTS

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA

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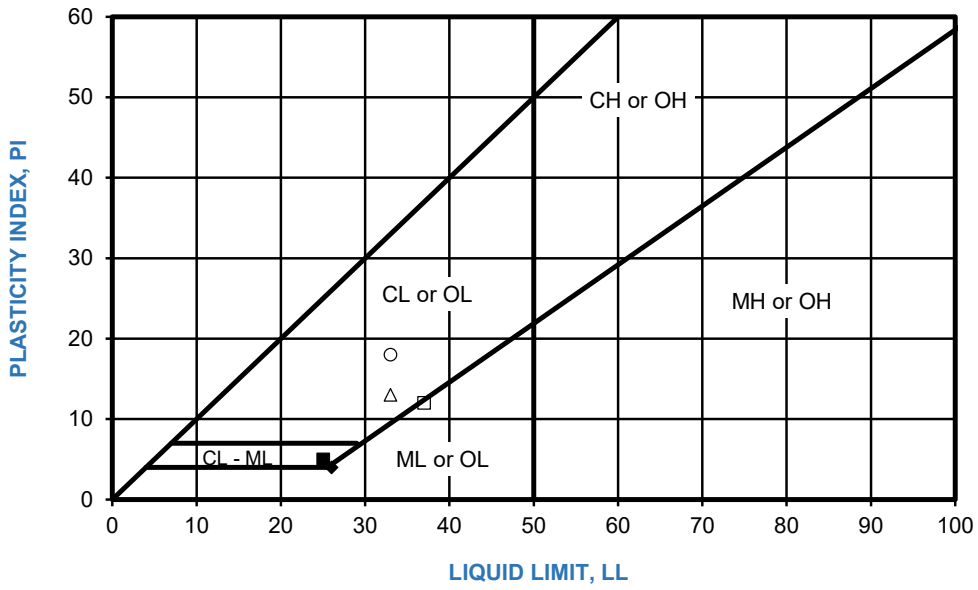
SYMBOL	LOCATION	DEPTH (ft)	LIQUID LIMIT	PLASTIC LIMIT	PLASTICITY INDEX	USCS CLASSIFICATION (Fraction Finer Than No. 40 Sieve)	USCS
●	B-1	3.0 - 3.5				NP	NP
■	B-2	5.0 - 5.5	25	20	5	CL-ML	CL-ML
◆	B-3	15.0 - 16.5	26	22	4	ML	ML
○	B-4	10.0 - 10.5	33	15	18	CL	CL
□	B-5	30.0 - 31.33	37	25	12	ML	ML
△	B-6	11.0 - 11.5	33	20	13	CL	CL



PERFORMED IN ACCORDANCE WITH ASTM D 4318

FIGURE B-5

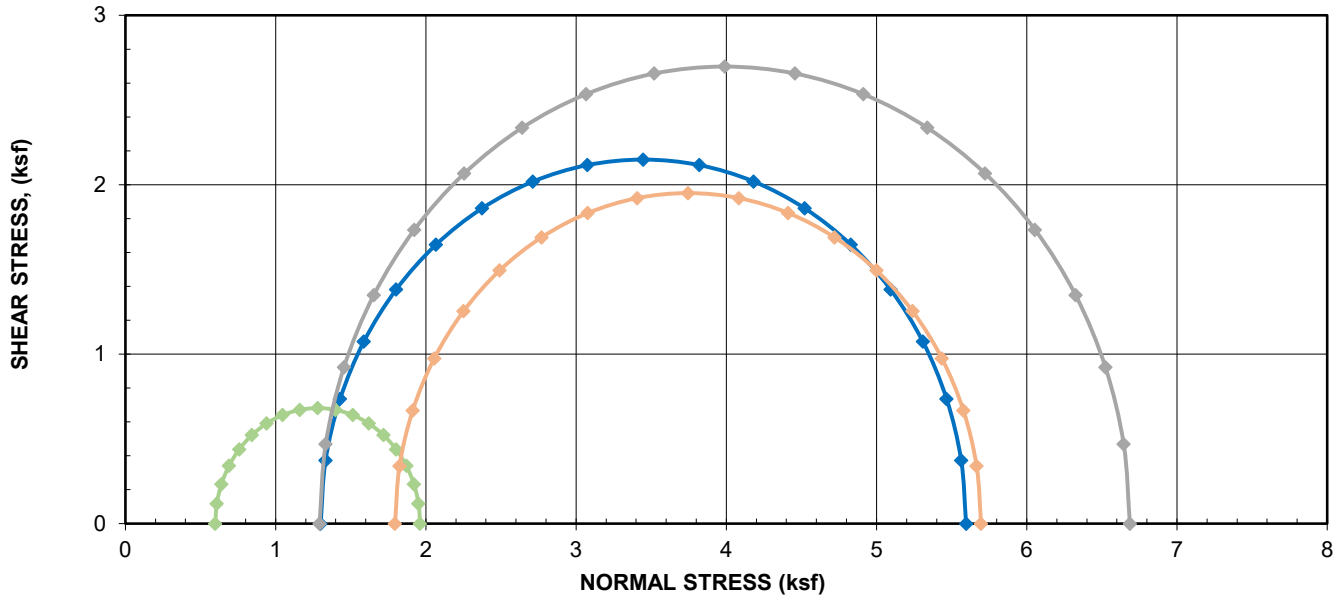
ATTERBERG LIMITS TEST RESULTS

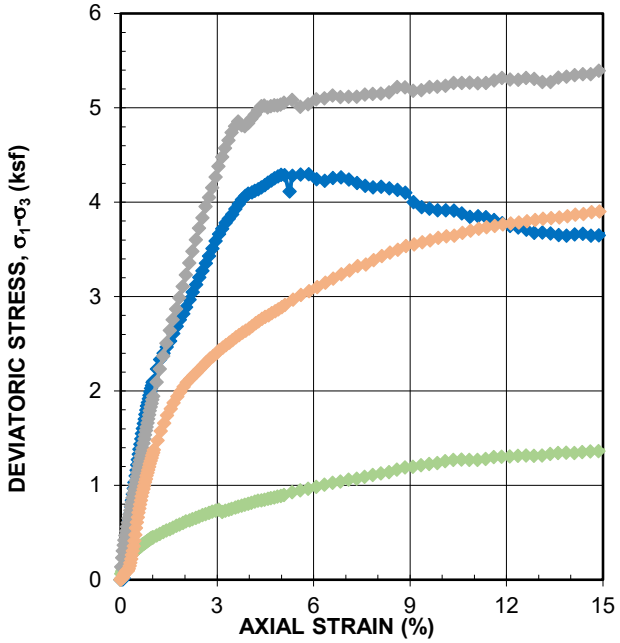
Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA
404831001 | 08/24

SAMPLE LOCATION	SAMPLE DEPTH (ft)	INITIAL MOISTURE (percent)	COMPACTED DRY DENSITY (pcf)	FINAL MOISTURE (percent)	VOLUMETRIC SWELL (in)	EXPANSION INDEX	POTENTIAL EXPANSION
B-1	0.0 - 5.0	11.8	102.3	21.2	0.004	4	Very Low
B-4	0.0 - 5.0	13.1	100.3	24.3	0.025	25	Low
B-5	0.0 - 5.0	12.6	100.8	23.7	0.023	23	Low

PERFORMED IN ACCORDANCE WITH ASTM D 4829





SYMBOL		◆	◆	◆	◆
SAMPLE LENGTH, (in)		6.00	5.80	6.00	5.85
SAMPLE DIAMETER, (in)		2.42	2.40	2.40	2.40
SPECIFIC GRAVITY, ( )		2.65	2.65	2.65	2.65
INITIAL	MOISTURE, (%)	13.2	24.2	18.9	17.4
	DRY DENSITY, (pcf)	116.0	99.1	104.4	95.4
	VOID RATIO, ( )	0.4255	0.6686	0.58391	0.7333
	SATURATION, (%)	82.2	95.9	85.8	62.9
CELL PRESSURE, (ksf)		1.3	0.6	1.3	1.8
BACK PRESSURE, (ksf)		0.0	0.0	0.0	0.0
STRAIN RATE, (%/minute)		1.0	1.0	1.0	1.0
AT FAILURE	ELAPSED TIME, tf (min)	5.9	14.9	14.9	15.0
	AXIAL STRAIN, εf (%)	5.8	14.9	14.9	14.9
	DEVIATOR STRESS (ksf)	4.30	1.4	5.4	3.9
	MAJOR STRESS, σ1f (ksf)	5.60	1.96	6.69	5.70
	MINOR STRESS, σ3f (ksf)	1.30	0.60	1.29	1.79
MEMBRANE CORRECTION USED		NO	YES	NO	NO

	DESCRIPTION (USCS SOIL TYPE)	SAMPLE LOCATION	SAMPLE DEPTH (feet)	COMPRESSIVE STRENGTH (ksf)	UU SHEAR STRENGTH s_u, (ksf)	REMARKS
◆	sandy SILT (ML)	B-3	10.5-11.0	4.30	2.15	
◆	sandy lean CLAY (CL)	B-5	6.0-6.5'	1.36	0.68	
◆	sandy SILT (ML)	B-5	10.5-11.0'	5.39	2.70	
◆	sandy SILT (ML)	B-5	20.0-20.5'	3.90	1.95	

PERFORMED IN ACCORDANCE WITH ASTM D 2850 ON INTACT SPECIMENS

MOISTURE CONTENT & DENSITY EVALUATED BY ASTM D 2216 & ASTM D 7263, SPECIFIC GRAVITY ASSUMED

FIGURE B-7

UNCONSOLIDATED-UNDRAINED TRIAXIAL COMPRESSION RESULTS

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

NEW PORTABLE CLASSROOMS
2380 GALWAY DRIVE, SOUTH SAN FRANCISCO, CALIFORNIA

SAMPLE LOCATION	SAMPLE DEPTH (ft)	SOIL TYPE	R-VALUE
B-1	0.0 - 5.0	sandy SILT	69.0
B-4	0.0 - 5.0	sandy SILT	19.0

PERFORMED IN ACCORDANCE WITH ASTM D 2844/CT 301

APPENDIX C

Corrosivity Testing
(CERCO Analytical)

CERCO analytical
1100 Willow Pass Court, Suite A
Concord, CA 94520-1006
925 462 2771 Fax. 925 462 2775
www.cercoanalytical.com

7 August, 2024

Job No. 2407066
Cust. No.13270

Ms. Tatiana Gospe
Ninyo & Moore
2149 O'Toole Avenue, Suite 30
San Jose, CA 95131

Subject: Project No.: 404831001
Project Name: New Portable Classrooms, 2380 Galway Dr., South San Francisco, CA
Corrosivity Analysis – ASTM Test Methods

Dear Ms. Gospe:

Pursuant to your request, CERCO Analytical has analyzed the soil sample submitted on July 31, 2024. Based on the analytical results, this brief corrosivity evaluation is enclosed for your consideration.

Based upon the resistivity measurement, this sample is classified as "corrosive". All buried iron, steel, cast iron, ductile iron, galvanized steel and dielectric coated steel or iron should be properly protected against corrosion depending upon the critical nature of the structure. All buried metallic pressure piping such as ductile iron firewater pipelines should be protected against corrosion.

The chloride ion concentration reflects none detected with a reporting limit of 15 mg/kg.

The sulfate ion concentration is 82 mg/kg and is determined to be insufficient to damage reinforced concrete structures and cement mortar-coated steel at this location.

The pH of the soil is 6.42, which does not present corrosion problems for buried iron, steel, mortar-coated steel and reinforced concrete structures.

This corrosivity evaluation is based on general corrosion engineering standards and is non-specific in nature. For specific long-term corrosion control design recommendations or consultation, please call *JDH Corrosion Consultants, Inc. at (925) 927-6630.*

We appreciate the opportunity of working with you on this project. If you have any questions, or if you require further information, please do not hesitate to contact us.

Very truly yours,
CERCO ANALYTICAL, INC.

for

J. Darby Howard, Jr., P.E.
President

JDH/jdl
Enclosure

CERCO analytical
1100 Willow Pass Court, Suite A
Concord, CA 94520-1006
925 462 2771 Fax. 925 462 2775
www.cercoanalytical.com

Client: Ninyo & Moore
Client's Project No.: 404831001
Client's Project Name: New Portable Classrooms, 2380 Galway Drive, South San Francisco, CA
Date Sampled: 10-Jul-24
Date Received: 31-Jul-24
Matrix: Soil
Authorization: Signed Chain of Custody

Date of Report: 7-Aug-2024

Job/Sample No.	Sample I.D.	Redox (mV)	pH	Conductivity (umhos/cm)*	Resistivity (100% Saturation) (ohms-cm)	Sulfide (mg/kg)*	Chloride (mg/kg)*	Sulfate (mg/kg)*
2407066-001	B-4/0.0-5.0'	-	6.42	-	1,700	-	N.D.	82

Method:	ASTM D1498	ASTM D4972	ASTM D1125M	ASTM G57	ASTM D4658M	ASTM D4327	ASTM D4327
Reporting Limit:	-	-	10	-	50	15	15
Date Analyzed:	-	1-Aug-2024	-	31-Jul-2024	-	1-Aug-2024	1-Aug-2024

Julia Clauson
Chemist

* Results Reported on "As Received" Basis
N.D. - None Detected

Quality Control Summary - All laboratory quality control parameters were found to be within established limits

Chain of Custody

2407066

Page 1 of 1

1100 Willow Pass Court
Concord, CA 94520-1006
925 462 2771
Fax: 925 462 2775

CERCO analytical

Job No.	CU#	Client Project I.D.	Schedule	Date Sampled	Date Due
404831001	13270		Analyte	7/10/24	

Full Name Tatiana Gospe

Phone 4084359000 X 15208

Fax

Company and/or Mailing Address Ninyo & Moore 2149 O'Toole Avenue Suite 30 San Jose CA

Cell ☒

Sample Source New Portable Classrooms, 2380 Galway Drive, South San Francisco, CA

Lab No.	Sample I.D.	Date	Time	Matrix	Contain.	Size	Preserv.	Qtv.	Redox Potential	pH	Sulfate	Chloride	Resistivity-100% Saturated			Brief Evaluation						
									ANALYSIS													ASTM
1	B-4/0.0-5.0'			S						x	x	x	x			x						

MATRIX
DW - Drinking Water
GW - Ground Water
SW - Surface Water
WW - Waste Water
Water
SL - Sludge
S - Soil
Product

ABBREVIATIONS
HB - Hosebib
PV - Petcock Valve
PT - Pressure Tank
PH - Pump House
RR - Restroom
GL - Glass
PL - Plastic
ST - Sterile

SAMPLE RECEIPT
Total No. of Containers
Rec'd Good Cond/Cold
Conforms to Record
Temp. a t Lab -°C
Sampler

Comments:

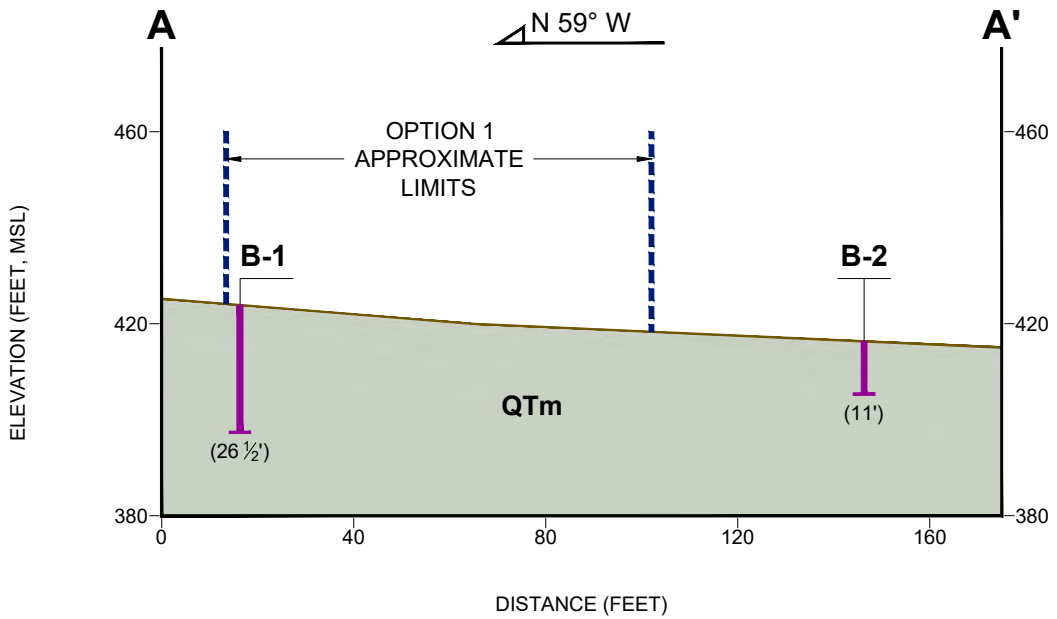
THERE IS AN ADDITIONAL CHARGE FOR EXTRUDING SOIL FROM METAL TUBES

Email Address tgospe@ninyoandmoore.com

Relinquished By:		Date 7/24/24	Time 10:30 am
Received By:	Diana Juell	Date 7/31/24	Time 0730
Relinquished By:		Date	Time
Received By:		Date	Time
Relinquished By:		Date	Time
Received By:		Date	Time

APPENDIX D

Geologic Cross-Sections



LEGEND

QTm	MERCED FORMATION	GEOLOGIC CONTACT: APPROXIMATE, QUERIED WHERE UNCERTAIN	B-1 BORING
MSL	MEAN SEA LEVEL	(26 ½')	TOTAL DEPTH

NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

404831001.dwg 08/05/2024 AEK

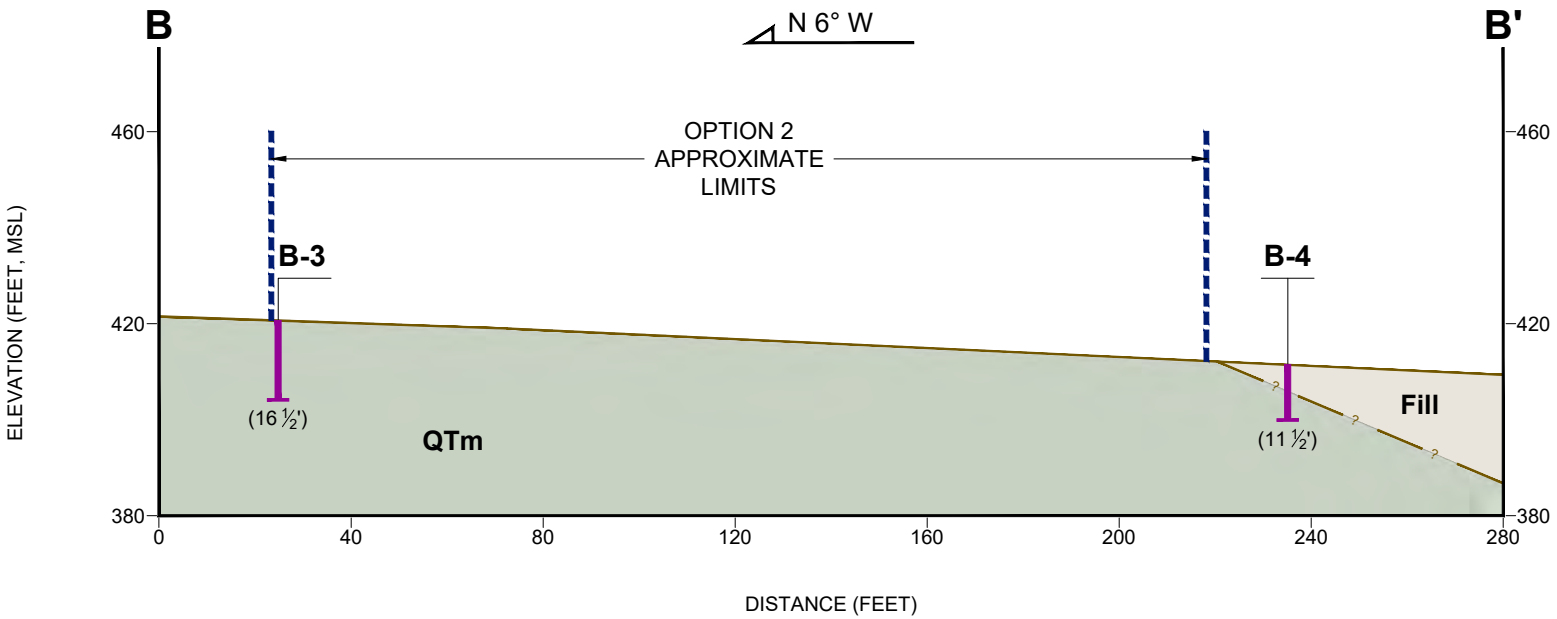
FIGURE D1

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

GEOLOGIC CROSS SECTION A-A'

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

404831001 I 08/24



LEGEND

Fill	UNDOCUMENTED FILL	??	GEOLOGIC CONTACT: APPROXIMATE, QUERIED WHERE UNCERTAIN	B-3	BORING
QTm	MERCED FORMATION	MSL	MEAN SEA LEVEL	(16 ½')	TOTAL DEPTH

NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

404831001.dwg 08/05/2024 AEK

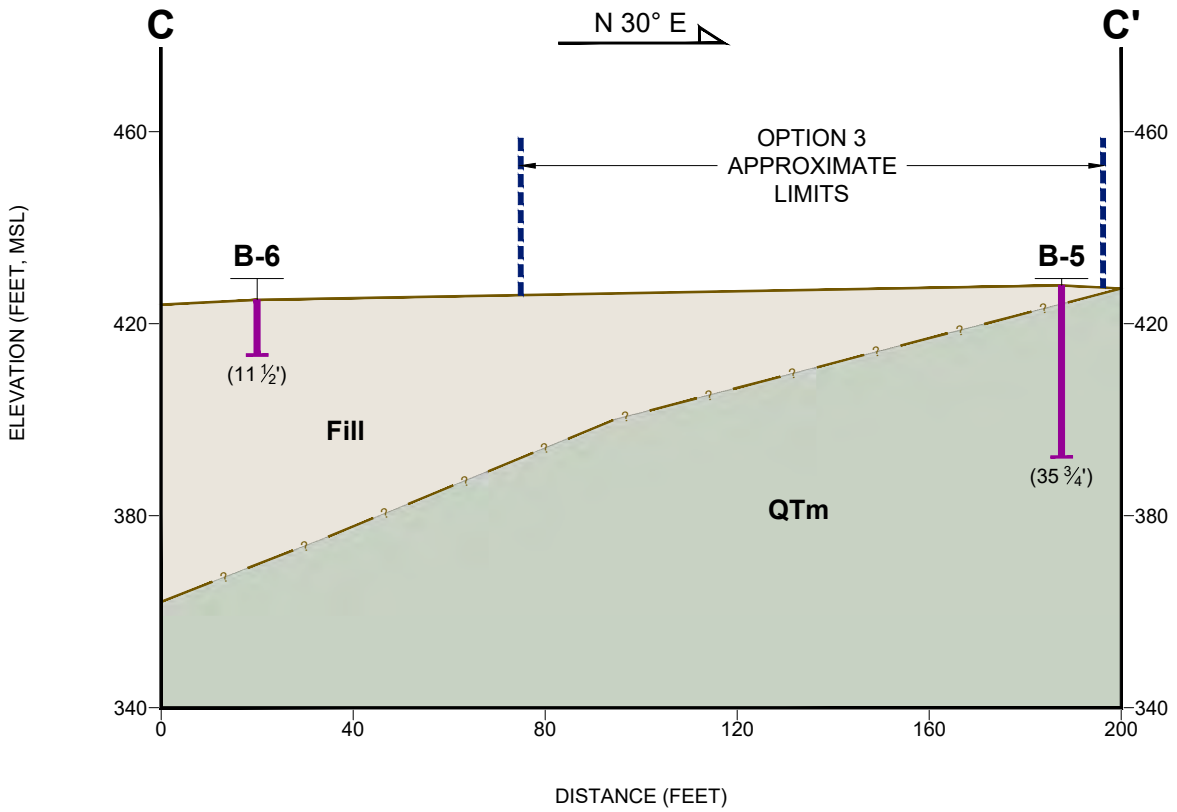
FIGURE D2

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

GEOLOGIC CROSS SECTION B-B'

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

404831001 I 08/24



LEGEND

Fill	UNDOCUMENTED FILL	??	GEOLOGIC CONTACT: APPROXIMATE, QUERIED WHERE UNCERTAIN	B-6	BORING
QTm	MERCED FORMATION	MSL	MEAN SEA LEVEL	(11 ½')	TOTAL DEPTH

NOTE: DIMENSIONS, DIRECTIONS, AND LOCATIONS ARE APPROXIMATE

404831001.dwg 08/05/2024 AEK

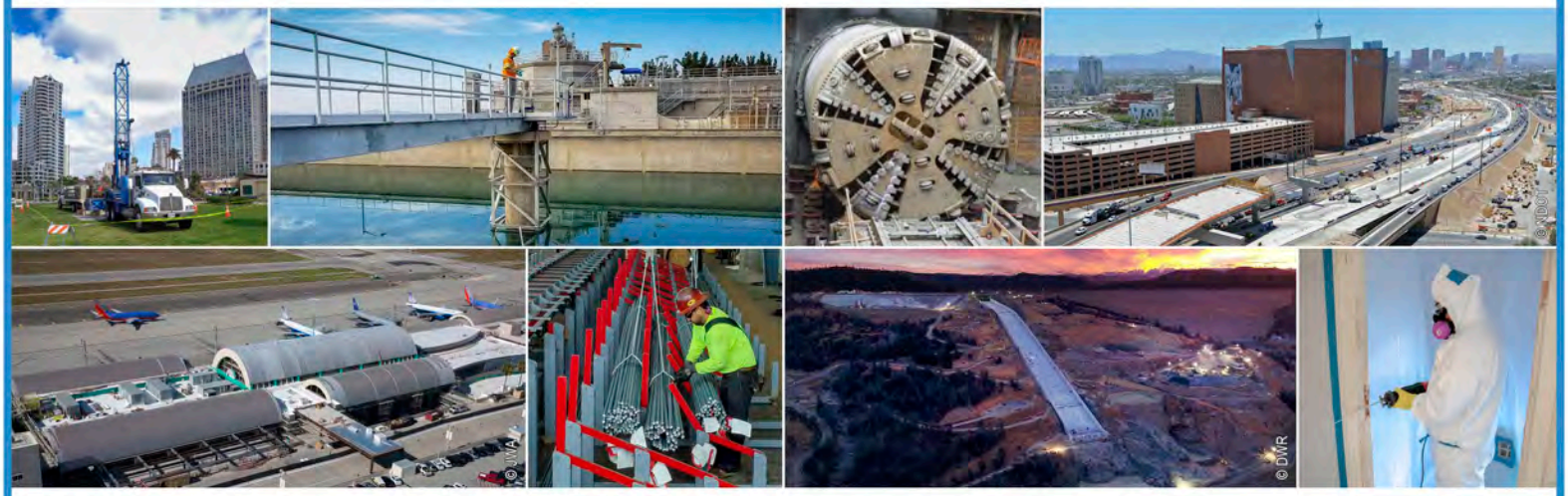
FIGURE D3

Ninyo & Moore
Geotechnical & Environmental Sciences Consultants

GEOLOGIC CROSS SECTION C-C'

WESTBOROUGH RECREATION CENTER
2380 GALWAY DRIVE
SOUTH SAN FRANCISCO, CALIFORNIA

404831001 I 08/24



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Geotechnical & Environmental Sciences Consultants

APPENDIX D

VMT/CEQA Initial Study Assessment Technical Memorandum

KITTELSON & ASSOCIATES
155 Grand Avenue, Suite 505
Oakland, CA 94612
P 510.839.1742

TECHNICAL MEMORANDUM

December 17, 2025 Project# 31964

To: Matthew "Lee" Moore
SWCA Environmental Consultants
95 3rd Street, Second Floor
San Francisco, CA 94104

From: Dhawal Kataria, Andy Han, Amanda Leahy and Damian Stefanakis

CC: Julie Barlow, SWCA

RE: **SSF Westborough Preschool Expansion Project VMT/CEQA Initial Study Assessment**

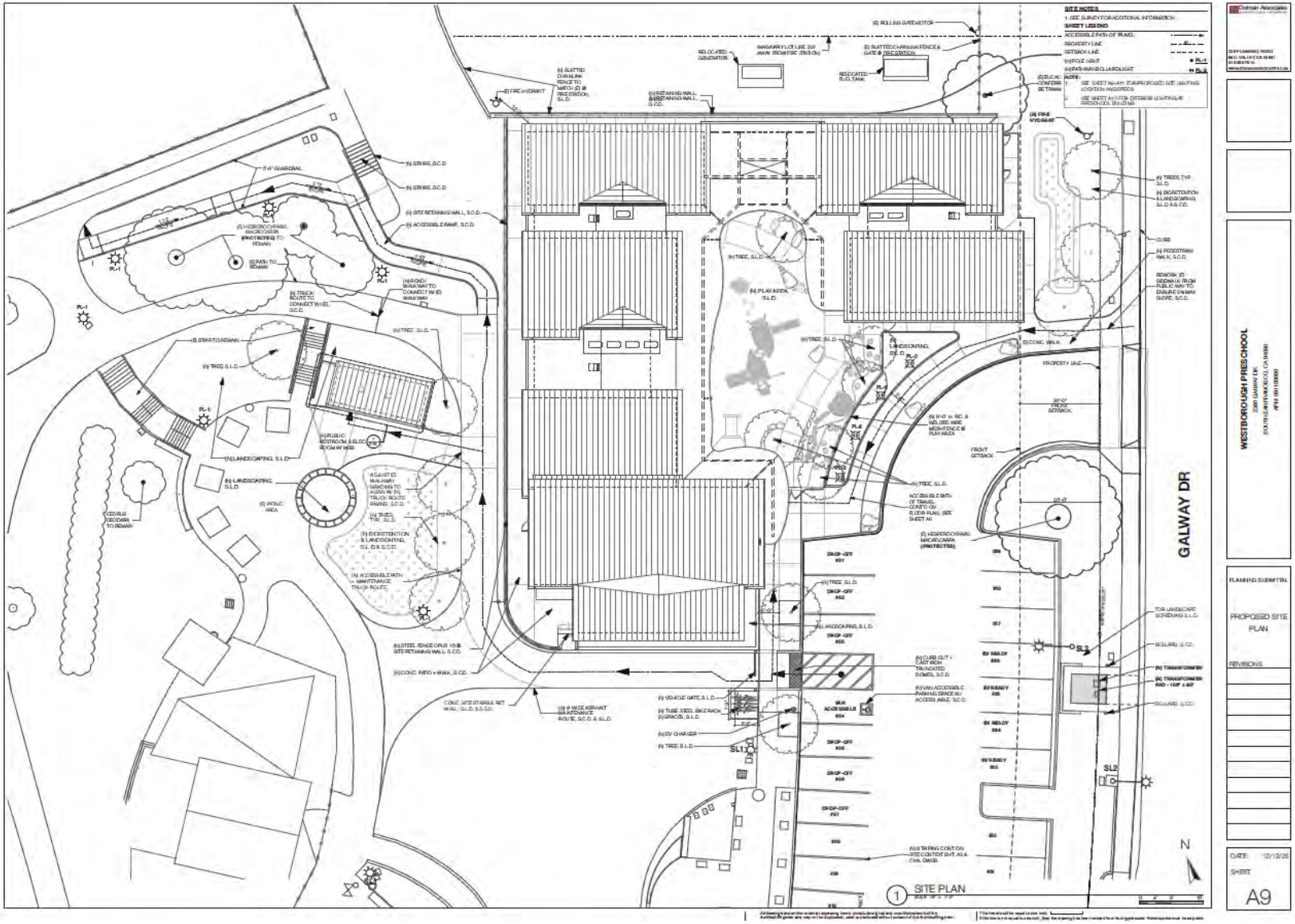
Background

Kittelson has drafted this revised memorandum to report the results of a trip generation and vehicle miles traveled (VMT) screening assessment for the redevelopment of the Westborough Preschool located at 2350/2360 Galway Drive, South San Francisco, CA ("Project"). Kittleson prepared the CEQA Transportation Appendix G Checklist as summarized in this memorandum. The Project involves the construction of a new preschool building at the north end of the existing Westborough Park parking lot, which will house five (5) classrooms and accommodate up to 100 students with support from 15 staff. The existing preschool program, currently located at the Alice Bulos Community Center (serving approximately 59 students), will remain active during construction, but ultimately the program will fully transfer over to the new preschool once construction is completed. The community center space will be repurposed for expanded community programming. **Figure 1** shows the proposed Project site plan dated December 12, 2025, and **Figure 2** shows the traffic management plan prepared by Dorman Associates dated December 12, 2025. The traffic management plan details circulation movement within and around the project area, including designated drop-off parking locations.

The preschool operates Monday through Friday from 7:30 AM to 6:00 PM and serves children ages 2–5 years. Drop-off typically occurs between 7:30 AM and 9:30 AM, while pick-up occurs between 4:00 PM and 6:00 PM, with staggered arrivals and departures every 15 minutes. The new building will include six designated pick-up/drop-off parking stalls adjacent to the entry, a reconfigured parking layout with 59 total spaces (including three accessible spaces), and circulation improvements to support a one-way loop system for vehicles entering and exiting from Galway Drive.

The expansion is intended to meet a growing demand for childcare services in the Westborough neighborhood. Enrollment capacity at the current facility is insufficient to serve local families, and the proposed new preschool is designed to provide a modern, purpose-built facility that better accommodates students, staff, and caregivers. Trip generation for the Project is anticipated to peak during the morning and evening drop-off and pick-up periods, with minimal mid-day activity.

Figure 1: Proposed Site Plan



Source: Dorman Associates, 12/12/2025

Figure 2: Traffic Management Plan

Source: Dorman Associates, 12/10/2025

Vehicle Parking Requirements

Kittelson reviewed the Westborough Preschool Parking Management Plan (PMP) prepared by Dorman Associates (dated December 12, 2025), included in **Appendix A**. The PMP notes that the total number of parking spaces in the lot will remain unchanged and that, based on staff observations, the lot currently operates at about 30 percent utilization during normal school hours. Most spaces are expected to be used by staff, while student pick-up and drop-off will occur in six spaces located at the north end of the lot near the new preschool entry. The PMP also anticipates that some students will arrive by other modes of transportation, and some families will have two children in the program.

The PMP concludes that the current parking lot would meet the Project parking requirements (15 for staff and 6 for pick-up/drop-off). It also explains that while the parking lot is shared between park visitors, community center users and proposed preschool, due to non-overlapping parking needs, the shared lot would be able to support the shared parking needs among the three activities/land uses. In addition, approximately 20 on-street spaces adjacent to the school are available for overflow during peak periods. While the Active South City Plan recommends a Class IIIB Bicycle Boulevard along Galway Drive, this would not affect the availability of on-street parking.

Based on the PMP, Kittelson anticipates that overall parking supply will be adequate. Furthermore, strategies are available to encourage staff to use alternatives to driving.

Trip Generation

To estimate trip generation for the Westborough Preschool Project, Kittelson used the Institute of Transportation Engineers (ITE) *Trip Generation Manual, 12th Edition*, Land Use Code (LUC) 565 – Day Care Center. This land use category is the most appropriate match for a preschool facility serving children ages 2–5. The analysis used student enrollment as the independent variable.

Trip generation rates from ITE were applied to both the existing program (59 students, 8 staff) and the proposed program (100 students, 15 staff) to estimate weekday daily and peak hour trips. Results for daily and peak hour trips are summarized in **Table 1**. Under proposed conditions, the Project is expected to generate 379 weekday daily trips, compared to 224 trips under existing conditions, resulting in a net increase of 155 daily trips. In addition, during the AM and PM peak hours the project is expected to generate 79 AM and PM peak trips, compared to 47 AM and PM peak trips under existing conditions, resulting in a net increase of 32 peak hour trips.

The PMP estimated a total of 446 daily trips based on a conservative assumption that all 100 children would be driven individually to the school. In contrast, the ITE estimates presented in Table 1 are based on comparable sites and account for children who may walk or carpool. Therefore, the estimated 379 daily trips is considered a more realistic estimate.

Table 1: Project Daily & Peak Hour Trip Generation

Land Use Code	Scenario	Number of Students	Average Daily Rate	Weekday Daily Trips	Weekday AM Peak Hour Trips	Weekday PM Peak Hour Trips
Day Care Center (565)	Existing	59	3.79	224	47	47
	Proposed	100	3.79	379	79	79
Net Change				**155**	**32**	**32**

Source: ITE Trip Generation Manual, 12th Edition

As with other childcare facilities, trip generation at the preschool will be concentrated during the morning drop-off period (7:30–9:30 AM) and the afternoon pick-up period (4:00–6:00 PM), with minimal activity during the mid-day. Based on the Project's operational plan, approximately 12–15 students are expected to arrive or depart every 15 minutes within these peak windows.

CEQA Appendix G Transportation Checklist

A. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

The Project is consistent with the South San Francisco 2040 General Plan (Shape SSF) Mobility Element, which emphasizes creating a safe, connected, and multimodal transportation system with a focus on Safe Routes to School and neighborhood-serving facilities. The Project provides six dedicated pick-up/drop-off stalls, 15 staff stalls, and three ADA stalls within the existing 59-space parking lot. A new internal sidewalk directly connects the drop-off area to the preschool entrance, minimizing conflicts between vehicles and pedestrians. Marked crosswalks on Galway Drive provide safe neighborhood access, while the South City Shuttle (Orange Route) and nearby SamTrans routes support transit accessibility. The site design and location are therefore consistent with circulation system policies for all modes.

The South San Francisco Municipal Code (§20.330.004, Table 20.330.004, and §20.350) requires daycare centers to provide bicycle parking facilities as part of the site plan review process. Again, the 2040 General Plan Mobility Element (Action MOB-5.1.3) further emphasizes the expansion of bicycle parking at activity centers to promote cycling. The Project currently proposes installing a small bicycle parking area near the drop-off vehicle parking spaces that can accommodate up to five (5) bicycles; which exceeds the City's short-term parking demand of four bicycles (SSF Municipal Code § 20.330.007 Bicycle Parking). Additionally, the Project includes one (1) long-term parking space located within the building next to the main entrance to the lobby. The proposed amount of bicycle parking is consistent with City's municipal code. These facilities will improve multimodal access and make the Project consistent with the City's circulation system policies.

Table 2 presents a summary of review of Project consistency with applicable planning efforts regarding the circulation system.

Table 2: Project Consistency with Plans, Ordinances and Policy Summary

Plan/Ordinance/Policy	Project Consistency
South San Francisco 2040 General Plan Mobility Element	Goal MOB-4: South San Francisco's land use and transportation actions reduce vehicle miles traveled (VMT) and greenhouse gas emissions. • Action MOB-4.1.1: Use site plan review to improve connectivity. • Action MOB-5.1.3: Expand bicycle parking at activity centers. The Project proposes to include a bike parking facility to promote cycling. The Project is consistent with the General Plan Goal as it involves an expansion and relocation within the same vicinity as the existing site. As described in checklist item B, the additional VMT generated by the expansion will be minimal. The project also meets the bicycle parking requirements outlined in the municipal code. Hence, the Project is Consistent with the General Plan.
Active South City Plan	Upgraded crossings and bikeways along Westborough Boulevard and Galway Drive By providing on-site sidewalks, ADA stalls, and bicycle parking, the Project complements these planned City investments and supports broader goals to expand safe routes for walking and cycling to schools and community facilities. Hence, the Project is consistent with the Active South City Plan.
South San Francisco Municipal Code	§ 20.330.004 Required Parking Spaces. Maximum Number of Spaces Required. As per Table 20.330.004 of the SSF Municipal Code, the Maximum number of parking spaces required for the Day Care Center is 1 per employee, plus additional parking as provided in the Pick-Up/Drop-Off Plan required pursuant to Chapter 20.350, Day Care Centers. Pick-up/Drop-off Plan. A plan and schedule for the pick-up and drop-off of children or clients shall be provided for review and approval by the Chief Planner. The plan shall demonstrate that adequate parking and loading are provided on-site to minimize congestion and conflict points on travel aisles and public streets. The plan shall also demonstrate that increased traffic will not cause traffic levels to exceed those levels customary in residential neighborhoods except for higher traffic levels during the morning and evening commute. The plan shall include an

Plan/Ordinance/Policy	Project Consistency
	agreement for each parent or client to sign, which includes, at a minimum: 1. A scheduled time for pick-up and drop-off with allowances for emergencies. 2. Prohibitions of double-parking, blocking driveways of neighboring houses, or using driveways of neighboring houses to turn around. As discussed earlier, the Project is consistent with South San Francisco Municipal Code vehicle and bicycle parking requirements.

Source: South San Francisco 2040 General Plan Mobility Element; Active South City Plan and South San Francisco Municipal Code

Based on the review of relevant planning efforts, it can be concluded that the Project will have **no impact**.

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

Kittelson requested home address information from the existing Westborough Preschool for currently enrolled students. Using ArcGIS Pro, a geographic information system (GIS), the information was mapped and analyzed. Kittelson then employed travel route tools within ArcGIS Pro to establish and measure the likely routes between students' homes and the School. The travel routes are shown in **Figure 3.**

Based on this analysis, Kittelson found that the average trip length to the School is 1.8 miles per student, with 43 out of 55 students living within 2 miles of the School. The analysis assumes that the distribution of current student home locations is representative of future enrollment when the School expands to 90 students. Therefore, the average trip length is expected to remain the same under both current and full enrollment conditions, and Project trips are classified as local-serving.

According to the Governor's Office of Land Use and Climate Innovation (LCI, formerly the Office of Planning and Research) Technical Advisory and the City of South San Francisco Transportation Analysis Guidelines (SSF TA Guidelines), all land use Projects must be evaluated for transportation impacts under CEQA using vehicle miles traveled (VMT) as the primary metric. The proposed preschool is classified as a Locally Serving Public Facility, which is presumed not to require a detailed CEQA VMT analysis. Similar to other neighborhood-serving land uses, the new preschool would meet an existing demand for early childhood education within the community. Families currently travel outside South San Francisco for childcare; by relocating the preschool to a dedicated, accessible neighborhood facility, average trip lengths are expected to decrease as families no longer need to travel farther for services. Therefore, the Project is presumed to result in a **less-than-significant VMT impact under CEQA.**

To further confirm this conclusion, Kittelson reviewed the City/County Association of Governments (C/CAG) VMT Estimation Tool, which applies the C/CAG Travel Demand Model to estimate VMT/worker

generated by the Project site. The results show that the Project qualifies for a low VMT Screening Analysis. The summary report from the VMT Estimation Tool is provided in Appendix B.

Figure 3: Student Travel Pattern

C. Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Six dedicated pick-up/drop-off stalls are located adjacent to the preschool entrance and connected by sidewalk, eliminating the need for children to walk through parking aisles. The Project's circulation system intends to keep the current partial one-way driveway with a single entry near the proposed school site and two exits onto Galway Drive.

Since caregivers are required to park and personally escort each child into the building for check-in, rather than using curbside drop-off, minimal queuing is anticipated at the Project driveway. In the rare instance of queuing during parking turnover, the 82-foot driveway section between the first drop-off stall and the public sidewalk would accommodate up to four queued vehicles. To discourage parking within the driveway, a red curb and landscaped strip will be installed to prevent vehicles from blocking access. Additional details on the pick-up and drop-off procedures are provided in the PMP included in Appendix A. Considering these procedures, no off-site queuing along Galway Drive is expected.

The existing crosswalks on Galway Drive provide pedestrian connections from adjacent residential neighborhoods, consistent with the General Plan's school and community zone safety priorities. The parking lot currently experiences approximately 30 percent utilization during normal school hours, ensuring available capacity and reducing the likelihood of potential conflicts or hazards, such as double parking, resulting from overflow activity.[1]

The Project does not modify the existing circulation system and would not introduce new geometric design features that would result in hazards. Sight distance at the driveways is not expected to change from what is available under existing conditions and is expected to be adequate for drivers exiting the Project site and for pedestrians crossing the driveways.

Additionally, City of South San Francisco design standards require clear sight distance at driveway entries, generally with landscaping and other features maintained between 3 and 7 feet in height. Landscaping within the parking lot and along driveways will be maintained to preserve required sight lines.

Since the Project involves relocation and expansion of the existing preschool use within Westborough Park the Project use is compatible with the surrounding use.

For the above reasons, the Project would not increase hazards or result in incompatible use. Hence, the Project will result in a **less significant impact under CEQA.**

D. Result in inadequate emergency access?

Emergency access to the preschool is provided by two driveways and a circulation loop designed to meet City fire code standards for width and turning radii. The parking layout preserves clear lanes for emergency vehicles, and the site is directly adjacent to South San Francisco Fire Station 64, and would have rapid emergency response capability. These features demonstrate compliance with both the City's Transportation Analysis Guidelines and General Plan goals related to safe and reliable emergency access.

[1] City of South San Francisco. Staff Observation and Dorman Associates, Parking Management Plan (11.11.2025)

Therefore, the Project would result in adequate emergency access, and the Project's impacts to emergency access would be **less than significant**.

Table 3 summarizes the CEQA assessment for the transportation checklist.

Table 3: CEQA Assessment Summary - Transportation

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

Source: Kittelson & Associates, Inc. 2025

Findings and Recommendations

Based on our review of the Westborough Preschool Project, Kittelson concludes that the Project provides adequate vehicle and bicycle parking and that the existing circulation system can accommodate the proposed preschool expansion. The findings also conclude that the Project has no impacts or is less significant for the four transportation CEQA checklist items.

Kittelson recommends the following improvements to ensure consistency with City of South San Francisco requirements and best practices:

- **Landscape Maintenance**: Ensure landscaping at driveway entries complies with City design standards, which require vegetation to be maintained between three and seven feet in height to preserve sight distance. Final compliance should be confirmed during City review, and landscaping should be maintained to prevent obstructed lines of sight.

Appendix A – Westborough Preschool Parking Management Plan

Dorman Associates
COMMERCIAL AND RESIDENTIAL ARCHITECTURE

PARKING MANAGEMENT PLAN - WESTBOROUGH PRESCHOOL

TO: City of South San Francisco Planning Commission

FROM: Mary Peterson
Dorman Associates Inc.
229 Flamingo Road
Mill Valley, CA 94941
mp@dormanassociates.com

DATE: December 12, 2025

PROJECT: Westborough Preschool
2360 Galway Dr.
South San Francisco

About Westborough Preschool & Westborough Park

The City of South San Francisco Parks & Recreation Department offers childcare through its Preschool Early Learning Program, serving children ages 2 yrs – 5 yrs of age. The existing community center located at 2380 Galway Dr. has a student enrollment of 59 children distributed among three classrooms. One classroom is located within the community center, and two classrooms are in modular buildings directly adjacent. These classrooms currently use a play area that is also available for public use outside of school hours. The preschool operates Monday-Friday, 7:30am-6pm.

Westborough Park also includes a community center, picnic shelter, a small, uncovered picnic area, baseball field, walking trails, tennis courts, playgrounds, park restrooms, basketball courts and an informal lawn area. The picnic areas are rentable to the public on the weekends from March through October. The Alice Bulos Community Center is available to the public Monday - Saturday with limited community programs and is also available as a rental facility when not in use for other programs -- typically Saturdays and Sundays. The relocating of the preschool component may allow for increased community programming within the community center. There is also a ball field in the park, however, it is not presently used for games and practices, only informal play.

Planning & New Development

The need for childcare in the community has led to the desire to increase enrollment capacity at the Westborough location. A new building is being proposed at the north end of the parking lot that will accommodate (5) classrooms and (100) students. The existing preschool at the community center will remain active during construction, but ultimately the program will fully transfer over to the new preschool once construction is completed.

Parking Requirements for Preschool

Vehicle Parking

The existing preschool serves 59 children with 8 staff; the new program will serve 100 children with 15 staff. Per South San Francisco zoning, one stall per staff plus pick-up/drop-off spaces are required—totaling **15 staff stalls and 6 pick-up/drop-off spaces** (up from 8 and 3, respectively).

The existing lot has 59 spaces, including 2 accessible and 3 pick-up/drop-off stalls. The proposed plan maintains 59 spaces, increases to 3 accessible stalls (one EV), and relocates and expands pick-up/drop-off spaces to 6 at the north end near the new preschool entry. Three standard stalls will convert to compact and four standard stalls will be EV-ready.

As a community school, many caregivers walk for drop-off and pick-up, and nearby transit— including the South City Free Shuttle (Orange route stop across the street)—also serves children, caregivers, and staff.

VEHICULAR PARKING		
PARKING TYPE	**EXISTING**	**NEW**
ACCESSIBLE VAN STANDARD	**2** 1 VAN 1 STANDARD	**3** 2 VAN (1 EV) 1 STANDARD
STANDARD	**54**	**47** (4 EV-READY)
PICK-UP / DROP-OFF (POSTED HOURS)	**3**	**6**
COMPACT	**0**	**3**
TOTAL SPACES	**59**	**59**

Bicycle Parking

Per SSFMC Sec. 20.330.007(A)(1), short-term bicycle parking must equal 5% of required vehicle spaces, with a minimum of four. Based on 15 required vehicle spaces and 6 pick-up/drop-off spaces, four short-term bicycle spaces are required; five are provided within 50 feet of the preschool entry. One long-term bicycle space is also provided per Sec. 20.330.007(B)(1)(b).

Drop-off & Pick-up Process & Schedule

The preschool's drop-off and pick-up process differs significantly from that of a typical K–12 school. Since children are between the ages of 2 and 5, caregivers are required to park and personally escort each child into the building for check-in, rather than using a curbside drop-off. Caregivers enter through the main lobby and walk their child to the classroom, ensuring a safe and supervised transition.

Unlike K–12 programs, the preschool does not follow a fixed daily schedule or bell time. Families have flexibility within broad two-hour arrival and departure windows, which accommodate varying family schedules and the needs of young children. This staggered timing distributes vehicle activity throughout the morning and afternoon, resulting in far less traffic congestion than at a traditional school where large numbers of students arrive and depart simultaneously.

The largest shift of staff members would work a maximum total of 9 hours per day, from 7am-6:30pm. Their shifts are as follows:

7:00am - 4:00pm (2 staff members)
7:30am - 4:30pm. (2 staff members)
8:30am - 5:30pm (6 staff members)
9:00am - 6:00pm (5 staff members)

The new preschool will have a maximum of 100 enrolled children. Based on operational data from the existing 59-child program, typical drop-off takes 10–15 minutes, with 8–10 children arriving every 15 minutes between 7:30–9:30 am and pick-ups occurring every 15 minutes from 4:00–6:00 pm. With the expanded program, we anticipate 12–15 children will be dropped off and picked up every 15 minutes during the same timeframes. Caregivers are required to escort children to their classrooms and sign them in.

The existing preschool currently provides three pick-up/drop-off spaces. With the expanded program serving 100 children, six dedicated pick-up/drop-off spaces are proposed (parking spaces #1–3 and #5–7) to accommodate increased activity. In addition to these six spaces, the remaining parking spaces will remain available for caregiver use during pick-up and drop-off as needed, as well as for staff and public parking throughout the day.

The six dedicated spaces will be clearly signed and restricted for pick-up/drop-off use during the primary two-hour morning and afternoon windows (7:30 am–9:30 am and 4:00 pm–6:00 pm). Outside of these designated hours, the spaces will be open for general use by staff and the public, maximizing overall parking efficiency while ensuring safe and convenient access for families during peak arrival and departure times.

Trip Analysis

The trip analysis for the center assumes 15 employees, generating 30 daily trips, with a potential 10 additional trips for lunch or other reasons. Cleaning, maintenance, and deliveries add an average of 6 trips per day. Each of the 100 children will be dropped off and picked up, totaling 400 trips; however, some families have two children in the program, which reduces the total number of trips slightly. An additional 10 trips are included for occasional guests. Overall, morning trips until 9:30 am are 215, daytime trips from 9:30 am–4:00 pm are 16, and evening trips from 4:00–6:00 pm are 215, for a total of 446 daily trips.

The existing parking lot has an entry/exit drive at the north end of the lot off Galway Dr., and a one-way, two-lane exit at the south end off Galway Drive near Westborough Boulevard. This controlled

circulation reduces congestion near the Galway / Westborough intersection and allows for orderly drop-off and pick-up. The entry drive provides approximately 82 ft between the first drop-off stall and the public sidewalk, allowing up to four cars to queue briefly if needed while waiting for cars to pull out of or into parking spaces. The curb of the entry drive will be painted red, and a landscape strip will be added along the curb with planting. Since caregivers are required to escort their children into the school, it is highly unlikely that they would park along the red curbed area for pick-up/drop-off as may be expected at a K-12 school. The red curb and landscaping will deter this activity by caregivers and general park users.

Caregivers can loop through the lot if spaces are unavailable. Drop-off/pick-up stalls are adjacent to the preschool entry, with a sidewalk ensuring children do not walk through the parking area, maintaining safety and efficient traffic flow.

Special School Events

The school is expected to host two special events per year; a Halloween costume parade and a Trike-a-thon. Parents drop off children at the usual arrival time and return at a designated time for the event. They may park in the school lot or on nearby streets, but because children are already in the school's care, parking and circulation have not been an issue in the past and have not required management. Not all the parents are able to attend so parking in the past has not been an issue and has not needed to be managed. Traffic management and parking plans will be made if necessary to minimize any impacts on park operations and the surrounding neighborhood.

Park Day Use Observations

On weekdays, Westborough Park is primarily used mid-day by the public for playgrounds, tennis courts, and small community activities such as Tai Chi. Observations during preschool hours show the parking lot at roughly 30% capacity, with additional on-street parking available along Galway Drive. Some overnight parking by neighborhood residents may occur, though it is prohibited between 3:00 am and 5:00 am, with signage posted accordingly.

The park includes a community center, picnic shelter and uncovered picnic areas, baseball field, walking trails, tennis courts, playgrounds, basketball courts, restrooms, and informal lawn areas. Picnic areas are rentable on weekends from March through October. The Alice Bulos Community Center is open Monday–Saturday for limited programs and available for rentals, typically on weekends. Relocating the preschool may allow for expanded community programming. The ball field is currently used only for informal play, not organized games or practices.

Westborough Middle School Drop-off / Pick-up Schedule

Westborough Middle School borders the park to the west and operates a traditional K-8 school scheduling. The parking lot entry for pick-up & drop-off is approximately ¼ mile west of the Westborough / Galway intersection, providing decent separation from the preschool pick-up/drop-off operations. Additionally, its traffic patterns differ significantly from preschool operations and occur at distinct times.

Daily Schedule:

- Start Time: 8:40am
- Drop-off Window: 8:20am-8:40am
- Dismissal: 3:15pm
- Pick-up Window: 3:15-3:30pm

Wednesday Early Release

- Dismissal: 1:50pm
- Pick-up Window: 1:50-2:10pm

Interaction with Preschool Circulation:

- Preschool arrival (7:30am-9:30an) overlaps only partially with middle school drop-off (8:20-8:40am)
    - Preschool traffic is distributed over a two-hour window
    - Middle school traffic occurs in a 20-minute peak surge
- Afternoon preschool pick-up (4:00-6:00pm) occurs well after middle school dismissal at 3:15 pm, and Wednesday early release at 1:50pm.

The staggered nature of preschool operations, combined with separate parking areas and circulation paths, avoids any potential conflicts between the two facilities.

Environmental and Land Use Benefits of Reduced the Impervious areas

The new program for Westborough Preschool includes several environmental benefits which are enhanced by maintaining the existing parking count. The primary benefits are larger outdoor play areas, the preservation of the existing lawn space, reduced stormwater runoff, and mitigation of heat island effect.

The existing lawn area is used by the local community. Keeping much of the existing lawn space intact decreases stormwater runoff by allowing for more pervious areas on-site.

Another environmental benefit of maintaining the existing parking lot is that less pavement surface area helps reduce heat island effect. Asphalt absorbs and re-emits the sun’s heat more than the natural landscape, which then increases the temperature of the buildings on-site and raises the demand for air conditioning / cooling systems.

Based on the new drop-off management plan of the preschool, and the addition of new play areas and preserved community open spaces, we request that the Economic & Community Development Department for the City of South San Francisco approves the proposed parking plan to serve Westborough Park & Preschool.

Appendix B – VMT Screening

C/CAG VMT Estimation Tool Report

Project Details

Timestamp of Analysis: September 23, 2025, 12:00:40 PM

Project Name: Westborough Preschool

Project Description: The project involves the construction of a new preschool building at the north end of the existing Westborough Park parking lot, which will house five (5) classrooms and accommodate up to 90 students with support from 15 staff.

Project Location

jurisdiction:
South San Francisco

apn	TAZ
091150080	1930

Inside a TPA?
No (Fail)

Analysis Details

Data Version: C/CAG Travel Model

Analysis Methodology: TAZ

Baseline Year: 2015

Project Land Use

Residential:

Single Family DU:

Multifamily DU:

Total DUs: 0

Non-Residential:

Office KSF:

Local Serving Retail KSF:

Industrial KSF:

Residential Affordability (percent of all units):

Extremely Low Income: 0 %

Very Low Income: 0 %

Low Income: 0 %

Parking:

Motor Vehicle Parking:

Bicycle Parking:

Office Vehicle Miles Traveled (VMT) Screening Results

Land Use Type 1:	Office
VMT Without Project 1:	Total Project Generated VMT per Service Population
VMT Baseline Description 1:	County Average
VMT Baseline Value 1:	30.5
VMT Threshold Description 1:	0%
Land Use 1 has been Pre-Screened by the Local Jurisdiction:	N/A

	Without Project	With Project & Tier 1-3 VMT Reductions	With Project & All VMT Reductions
Project Generated Vehicle Miles Traveled (VMT) Rate	28.6	null	null
Low VMT Screening Analysis	Yes (Pass)	null	null