

ADDENDUM TO THE NEGATIVE DECLARATION  
FOR THE  
SAN MATEO COUNTY TRANSIT DISTRICT (SAMTRANS)  
ZERO EMISSIONS BUS IMPLEMENTATION PROJECT INITIAL  
STUDY / NEGATIVE DECLARATION



San Mateo County Transit District

September 2024

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## 1.0 BACKGROUND AND PURPOSE

### BACKGROUND

The San Mateo County Transit District (District) is the administrative body for the principal public transit and transportation programs in San Mateo County, comprising SamTrans bus service (SamTrans) and other services. This document is the District's California Environmental Quality Act (CEQA) addendum to the Zero Emissions Bus Implementation Project (ZEB Project) Initial Study/ Negative Declaration (IS-ND).

The District published the ZEB Project Draft IS-ND in September 6, 2022. During the 21-day public review period, the District received no comments on the Draft IS-ND. The District prepared the Final IS-ND. In December 2022, the District Board adopted the Negative Declaration, and the District filed a Notice of Determination with the San Mateo County Clerk.

Since completion of the 2022 Final IS-ND and filing of the Notice of Determination at the San Mateo County Clerk, SamTrans has determined that the project scope must be expanded to include SamTrans's acquisition of Assessor Parcels 015180200 and 015180110 in the City of South San Francisco. Acquisition of these parcels will provide additional space for construction staging and laydown for the ZEB Project implementation at SamTrans's North Base bus yard. See Section 2.0 for more information. This addendum supplies SamTrans's environmental review of these activities.

### ADDENDUM PROCESS

When a proposed project is changed or there are changes in the environmental setting, the lead agency must determine whether or not an addendum or subsequent ND is prepared. CEQA Guidelines Sections 15162 and 15164 set forth criteria to assess which environmental document is appropriate. The criteria for determining whether an addendum or subsequent MND is prepared are outlined below. If the criteria below are true, then an addendum is the appropriate document:

- No new significant impacts will result from the project or from new mitigation measures.
- No substantial increase in the severity of environment impact will occur.
- No new feasible alternatives or mitigation measures that will reduce impacts previously found not to be feasible have, in fact, been found to be feasible.

Based upon the information provided in Sections 2.0 and 3.0 of this document, implementation of the ZEB Project, including acquisition of Assessor Parcels 015180200 and 015180110, and use of a portion of Parcel 015180200 for construction staging and laydown, will not result in new significant impacts or substantially increase the severity of impacts previously identified in the 2022 IS-ND, and there are no previously infeasible alternatives that are now feasible. None of the other factors set forth in Section 15162(a)(3) are present. As such, an addendum is appropriate, and this addendum was prepared to address the environmental effects of the project modifications.

An addendum need not be circulated for public review, but it can be included in, or attached to, the IS-ND. The decision-making body (SamTrans's Board) shall consider the addendum with the IS-ND prior to making a decision on the ZEB Project. Once adopted, the addendum, along with the original IS-ND, is placed in the administrative record, and a Notice of Determination will be filed with the County Clerk and State Clearinghouse.

## 2.0 CHANGE IN PROPOSED PROJECT

The ZEB Project entails re-purposing the existing bus maintenance-operations facilities at SamTrans's North Base (South San Francisco) and South Base (San Carlos) from diesel fuel to zero-emissions infrastructure, including battery electric bus (BEB) and fuel cell electric bus (FCEB). Key physical elements include installation of new at-grade,

below-grade, and above-grade charging infrastructure; as well as maintenance bay improvements to address new bus types and maintenance needs. Construction sequencing at each base will depend on the amount of parking area that can be made available while maintaining continuity of bus operations at each base.

As analyzed in the 2022 IS-ND, the ZEB Project would be built almost entirely within the boundaries of North Base and South Base, except for connection to PG&E primary services via local roadways. No property acquisition or use of other parcels would be required.

Since adoption of the Final Negative Declaration in 2022, SamTrans has determined that additional construction staging and laydown space is required near North Base to implement the ZEB Project. Therefore, SamTrans will acquire Assessor Parcels 015180200 and 015180110 in the City of South San Francisco. These parcels are directly east of SamTrans North Base. Concurrent with the acquisition, a lot line adjustment will be applied to expand Assessor Parcel 015180200 to encompass the entire upland area on the eastern portion of Belle Aire Island. Assessor Parcel 015180110 would be reduced by the same area. See Figure 1.

During construction of the ZEB Project, SamTrans will use a portion of Assessor Parcel 015180200 for construction staging and laydown. The area used for staging and laydown is located directly adjacent to the existing North Base bus yard, and it is located more than 100 feet from the San Francisco Bay shoreline. See Figure 1. SamTrans will remove a portion of the existing perimeter fence around North Base to access the construction staging and laydown area. During construction, SamTrans may elect to clear vegetation and/or place a gravel surface in this area. The gravel will be removed upon completion of construction.

No other substantial changes to the ZEB Project will occur.

## 3.0 UPDATED ENVIRONMENTAL IMPACT ANALYSES

### **AESTHETICS**

Assessor Parcels 015180200 and 015180110 are vacant property comprising dirt trails, sparse vegetation, wetlands, and open waters. There are no scenic trees, rock outcropping, historic buildings, or state scenic highways on or adjacent to these parcels. The acquisition, lot line adjustment, and temporary use of a portion of Assessor Parcel 015180200 for construction staging and laydown will not have substantial adverse impacts on aesthetic resources. Construction activities will be temporary and will not result in a substantial degradation to the project site, surrounding area, or significant aesthetic resources. Existing scenic vistas will still be available from the San Francisco Bay Trail. Therefore, impacts to aesthetic resources will be less than significant, and the impact conclusions from the 2022 IS-ND remain unchanged.

### **AIR QUALITY**

The property acquisition, lot line adjustment, and temporary use of a portion of Assessor Parcel 015180200 for construction staging and laydown will not increase construction duration or substantially change construction activities required for implementation of the ZEB project. Temporary construction emissions will be substantially similar to those estimated in the 2022 IS-ND, and the project will result in a long-term reduction in operational emissions. The proposed project will incorporate construction air quality BMPs such that substantial concentrations of pollutants will not occur near these receptors. Sensitive receptors will not be exposed to substantial pollutant concentrations, and diesel odors will be dispersed by prevailing meteorological conditions. Air quality impacts will be less than significant, and the impact conclusions from the 2022 IS-ND remain unchanged.

### **BIOLOGICAL RESOURCES**

The eastern portion of Belle Aire Island (Assessor Parcel 015180200 and the western portion of Assessor Parcel 015180110) is vacant and comprises a mix of developed (dirt trails), disturbed/landscaped, coastal salt marsh, and mudflat land covers. Coastal salt marsh is dominated by native pickleweed (*Salicornia pacifica*), although other

coastal salt marsh plants such as alkali heath (*Frankenia salina*), brass buttons (*Cotula coronopifolia*), fat-hen (*Atriplex prostrata*), goldenthead (*Cuscuta pacifica*), gumweed (*Grindelia sp.*), and salt grass (*Distichlis spicata*) are common. The coastal salt marsh provides habitat for wildlife species that specialize in this habitat type, including certain rare native species. The mudflat is unvegetated because it is often underwater at high tide; it provides habitat for invertebrates and shorebirds.

The remainder of Assessor Parcel 01580110 comprises mudflat land and open water. Open water is salt water and generally not vegetated, although algae or seaweed may grow under the surface. This land cover provides habitat for a variety of marine invertebrates, fish, marine mammals, and waterfowl.

According to the National Wetlands Inventory, the eastern portion of the parcel are estuarine and marine wetland. See Figure 2.

The acquisition of property, lot line adjustment, and temporary use of the western portion of Assessor Parcel 015180200 for construction staging and laydown will not disturb the coastal salt marsh, mudflats, wetlands, or open water. Construction staging and laydown activities will occur more than 100 feet from these habitats and resources. As indicated in the 2022 IS-ND, construction will comply with the National Pollutant Discharge and Elimination System (NPDES)/Construction General Permit, which will ensure that there is no siltation or other degradation of wetlands.

If project construction begins during the avian breeding season, pre-construction surveys will be undertaken to determine the presence of nesting birds. If nesting birds are observed, no site disturbance will occur within 250 feet of non-raptor nests and 1,000 feet of raptor nests until the chicks have fledged. These provisions will ensure that project construction complies with the Migratory Bird Treaty Act.

Depending on the ultimate construction staging and laydown plans, the proposed project may remove or prune trees that are defined as protected trees by South San Francisco's municipal code, or trees that provide visual screening from the San Francisco Bay Trail. Once the required tree removal plan is identified, the District will identify any protected trees that may be affected by the proposed project. The District will comply with municipal code governing protected tree removal or pruning. For trees to remain at each base, prior to construction a tree protection zone will be established around the trees within or adjacent to the impact areas. No heavy machinery will be allowed to pass through or park within this area, nor should debris, tools, or other materials be stored within the tree protection zone or against tree trunks.

Impacts to biological resources will be less than significant, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **CULTURAL RESOURCES**

As indicated in the 2022 IS-ND, there are no known archaeological resources at North Base. The nearest previously identified archaeological site, the North Colma Creek Site (P-41-002164; CA-SMA-000380), is more than 1,000 to the west. The acquisition of property, lot line adjustment, and temporary use of a portion of Assessor Parcel 015180200 for construction staging and laydown will not disturb archaeological resources. There are no buildings or other historic structures on the parcel. There will be no impact, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **GEOLOGY AND SOILS**

Active fault lines are located more than 3 miles away from Assessor Parcels 015180200 and 015180110. Property acquisition, lot line adjustment, and temporary use of Assessor Parcel 015180200 for construction staging and laydown will not result in structures that will be exposed to seismic ground-shaking, liquefaction, landslides, lateral spreading, soil expansion, subsidence, or collapse. If necessary, gravel will be laid down to prevent soil erosion during

construction activities. There are no known paleontological resources at the parcel. There will be no impacts related to Geology and Soils, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **HAZARDS AND HAZARDOUS MATERIALS**

A search of hazardous sites databases was undertaken for the project. At North Base, no federal National Priority List (Superfund) or Hazardous Waste sites were identified. North Base itself (site T0608100723) is the only known or potentially contaminated area of concern (AOC) identified nearby; the base was a leaking underground storage tank (LUST) cleanup site. The case was opened June 29, 1993, and closed on July 26, 2002. There are no identified AOCs at Assessor Parcels 015180200 or 015180110, and they are not identified for use in an emergency response plan or evacuation plan. Construction activities will be substantially similar to those described in the 2022 IS-ND, and there will be no changes in ZEB Project operations. There will be no impact related to hazards and hazardous materials, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **HYDROLOGY AND WATER QUALITY**

As indicated in the 2022 IS-ND, in accordance with NPDES General Permit requirements, for construction a Stormwater Pollution Prevention Plan (SWPPP) will be prepared and implemented. The SWPPP will identify BMPs to address pollutant source reduction and provide measures and controls necessary to address potential pollutant sources. The SWPPP will incorporate the construction staging and laydown activities that will occur on Assessor Parcel 015180200, and the activities will be located more than 100 feet from the San Francisco Bay shoreline. No permanent new impervious surface will be installed. As shown in Figure 3, portions of the parcel are located in the FEMA 500-Year Flood Zone (Zone X), 100-Year Flood Zone (Zone AE) and the 100-Year Flood Zone subject to storm wave hazards (Zone VE), but the acquisition of the parcel and temporary use for construction staging and laydown will not result in habitable structures or otherwise expose people to flood risk. Construction activities will be substantially similar to those described in the 2022 IS-ND, and there will be no changes in ZEB Project operations. Impacts to hydrology and water quality will be less than significant, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **NOISE**

Temporary use of Assessor Parcel 015180200 for construction laydown could temporarily increase noise levels along the San Francisco Bay Trail, which is located 100 feet east of the construction staging and laydown area. These noise increases will be substantially similar to those already analyzed in the 2022 IS-ND for construction activity within the existing boundaries of North Base. There will be no changes in ZEB Project operations, and there will be no operational noise impacts. The impact conclusions from the 2022 IS-ND remain unchanged.

## **RECREATION**

Assessor Parcels 015180200 and 015180110 contain a portion of the San Francisco Bay Trail. Temporary use of a portion of Assessor Parcel 015180200 for construction staging and laydown will occur approximately 100 feet westward of the trail, and therefore the project will not adversely affect trail access or use. Construction activities will be substantially similar to those described in the 2022 IS-ND, and there will be no changes in ZEB Project operations. Impacts to recreation will be less than significant, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **TRANSPORTATION**

Construction access to Assessor Parcel 015180200 will be from the west, through the North Base parking lot. Property acquisition, lot line adjustment, and temporary use of a portion of Assessor Parcel 015180200 for construction staging and laydown will not conflict with transportation plans or programs, increase operational VMT, induce hazards due to design features, or otherwise result in emergency access. Construction activities will be substantially similar to

those described in the 2022 IS-ND, and there will be no changes in ZEB Project operations. Impacts to transportation and traffic will be less than significant, and the impact conclusions from the 2022 IS-ND remain unchanged.

## **OTHER ENVIRONMENTAL TOPICS**

Assessor Parcels 015180200 and 015180110 are vacant. They do not contain agricultural, forestry, or mineral uses, and are it not zoned for such use. The parcels contains no existing housing units and no known tribal cultural resources. Existing land use plans and zoning allow for temporary use of the designated portion of Assessor Parcel 015180200 for construction staging and phasing. Construction activities will be substantially similar to those described in the 2022 IS-ND, and there will be no changes in ZEB Project operations. Therefore, the property acquisition, lot line adjustment, and temporary use of a portion of Assessor Parcel 015180200 during construction will not result in significant impacts to agricultural and forestry resources, energy, greenhouse gases, land use and planning, mineral resources, population and housing, public services, utilities and service systems, or wildfire. The impact conclusions from the 2022 IS-ND remain unchanged.

## **MANDATORY FINDINGS OF SIGNIFICANCE**

With incorporation of identified best management practices as identified in the 2022 IS-ND and this addendum, the proposed project will not have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory. The project does not have impacts that are individually limited but cumulatively considerable, and the project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly. The impact determinations the 2022 IS-ND are unchanged.

Figure 1





Figure 2



Figure 3



FINAL INITIAL STUDY/NEGATIVE DECLARATION  
SAMTRANS ZERO EMISSION BUS IMPLEMENTATION  
PROJECT



San Mateo County Transit District

October 2022

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# Part I Environmental Checklist Form

- 1. Project Title:** SamTrans Zero Emission Bus Implementation Project
- 2. Lead Agency Name and Address:** San Mateo County Transit District
- 3. Contact Person and Phone Number:** Hilda Lafebre, Deputy Director, Capital Projects & Environmental Compliance  
(650) 622-7842
- 4. Project Location** San Mateo County (with limited service to San Francisco and Palo Alto in Santa Clara County)
- 5. Project Sponsor's Name and Address:** San Mateo County Transit District,  
1250 San Carlos Ave., P.O. Box 3006,  
San Carlos, CA 94070-1306
- 6. General Plan Land Use Designations:** Various
- 7. Zoning:** Various
- 8. Description of Project:**

The San Mateo County Transit District (District) is the administrative body for the principal public transit and transportation programs in San Mateo County, comprising SamTrans bus service (SamTrans), including Redi-Wheels and RediCoast paratransit service; Caltrain commuter rail; and the San Mateo County Transportation Authority. SamTrans bus service serves San Mateo County and portions of San Francisco and Palo Alto in neighboring San Francisco and Santa Clara Counties, respectively.

The District proposes the SamTrans Zero Emission Bus Implementation Project (proposed project) at the SamTrans North Base in the City of South San Francisco and South Base in the City of San Carlos, in San Mateo County, California. The proposed project entails re-purposing the existing bus maintenance-operations facilities at North Base and South Base from diesel fuel to battery electric buses (BEBs) and hydrogen fuel cell electric buses (FCEBs).

## Background

SamTrans buses provide service primarily within San Mateo County, with additional connecting service into adjacent San Francisco County. The District has a fleet of more than 300 fixed-route revenue vehicles and 80 paratransit vehicles. SamTrans buses are stored and maintained at two locations, one at North Base in the City of South San Francisco and the other at South Base in the City of San Carlos.

Since early 2016, the District and other transit agencies across California have begun collaborative efforts with the California Air Resources Board (CARB) to reduce emissions and pollutants from conventional bus fleets by purchasing electric buses. In late 2018, CARB mandated that California transit bus fleets must be zero emission by 2040, requiring that all bus purchases in 2029 and after must be BEBs or FCEBs.

The SamTrans Innovative Clean Transit (ICT) Rollout Plan, approved by the District's Board of Directors in December 2020, outlined a plan to guide the District's transition from diesel- and gasoline-powered vehicles to zero emission by 2038, without early retirement of diesel vehicles. It articulated phased infrastructure upgrades to incrementally expand associated infrastructure as new zero-emissions vehicles are inserted in the fleet. Planned improvements included repaving and restriping of bus parking areas, installation of managed bus charging infrastructure, and an electrical service upgrade for each base to support BEBs.

Since the adoption of the ICT Rollout Plan, the District has identified an even earlier target date of 2034 for a full transition to ZEBs. In late 2021, the District's Board of Directors decided to reexamine the possibility of incorporating FCEBs into the ZEB portfolio for two reasons: FCEBs can cover a longer distance than BEBs to match the existing service provided by diesel buses on some routes; and FCEBs can provide additional operating flexibility during blackouts when BEBs are not as resilient.

Therefore, the District completed a Zero Emission Transition Plan in May 2022 that prioritizes BEBs as the default technology, while maintaining flexibility to implement FCEBs. The proposed project supports the Zero Emission Transition Plan's recommended fleet transition strategy and associated facility evaluations and improvements.

### **Proposed Project**

The proposed project entails re-purposing the existing bus maintenance-operations facilities at North Base and South Base from diesel fuel to BEBs. Key physical elements will include:

- New electrical equipment installed at-grade or below-grade, including Pacific Gas & Electric (PG&E) power feeds, master control panels, transfer switches, in-ground trenches for power distribution, in-ground power cable networks, and concrete islands for equipment placement.
- Overhead canopies for final connection and power delivery to BEBs. Bus charging dispensers will be structurally supported overhead by a 22-foot canopy system. Pantographs will connect upward to the dispensers. These canopies will be supported by cast-in-drilled-hole concrete piles that will be installed to depths of 45 feet at North Base and 35 feet at South Base. The design also includes a solar photovoltaic system which converts sunlight into electrical energy, allowing continuation of BEB operation without any support from the electrical grid in case of planned or unforeseen power outages.
- Several additional on-ground charges installed adjacent to maintenance shops to allow BEBs to charge while under repair.
- Maintenance bay upgrades to support BEBs.

Key physical elements involved in the re-purposing either bus base for FCEB implementation include:

- Use of cryogenic fuel storage tanks that will be connected to the facility power and portable fueling dispensers. Tanks will be placed to meet minimum setback requirements for safety.

- New portable fueling dispensers and electrical infrastructure upgrades.
- Maintenance facility upgrades, including new ventilation systems, hydrogen and flame detection systems, emergency shutoffs, and heating ventilation and air conditioning improvements.

Both bases will also include modified parking layouts and travel lanes to accommodate the new charging and refueling infrastructure. With the proposed project, all existing buildings will remain at each base, and all modifications will occur within the existing footprint of each facility, as well as within local roadways for PG&E direct service connection for BEBs.

Construction sequencing at each base will depend on the amount of parking area that can be made available while maintaining continuity of bus operations. Construction will start with installation of underground electrical utilities including conduit between the new main electrical service panel and the new transformer locations in the parking canopy areas. PG&E will bring a new underground 12 kilovolt feeder to the main electrical panel at each base. Following installation of the underground utilities, the canopy piers will be drilled. After the piers are completed, the canopy steel will be trucked in and set in place with a crane. Upon completion of the canopies in each section of the base, the process will repeat until all the canopies are completed. Maintenance facility upgrades will occur concurrently with canopy installation. The BEB chargers will be housed in modified shipping containers delivered to each base. Replacement of the asphalt parking area at South Base with a new concrete surface will occur after the underground electrical work is complete and before installation of the piers.

For proper and safe operations and maintenance at North Base and South Base, the District will develop a Bus Maintenance Electrical Safety Program to serve as a comprehensive training plan that addresses the operation, diagnosis, troubleshooting, repair, and preventative maintenance of ZEBs. All BEB and FCEB curricula will be developed, reviewed, and jointly approved by the management or staff and applicable unions.

### **Surrounding Land Uses and Setting**

**Figure 1** shows the regional project locations, **Figure 2** shows the location of North Base, and **Figure 3** shows the location of South Base. **Figure 4** shows the surrounding land uses at North Base, and **Figure 5** shows the surrounding land uses at South Base.

North Base is located at 301 N. Access Road, South San Francisco, California, 94080. The base is on a peninsula in South San Francisco. The peninsula is directly north of the San Francisco Airport and surrounded on three sides by waters of the San Francisco Bay. The San Francisco Bay Trail runs along the perimeter of the peninsula, outside North Base. North Base houses 169 buses, plus paratransit vehicles, and is situated on 27 acres with 110,400 square feet of buildings for operations and maintenance.

South Base is located at 501 Pico Boulevard, San Carlos, California, 94070. It is adjacent to the San Carlos Airport on the east, south, and southwest. Phelps Slough is located north across Pico Boulevard. Across Phelps Slough are a commercial office building, a hotel, and an on-road segment of the San Francisco Bay Trail. South Base houses 150 buses and is situated on 13 acres with 51,400 square feet of buildings for operations and maintenance.

**Other Required Public Agency Approvals**

Federal Aviation Administration approval may be required for the proposed photo voltaic panel installation at each base.





**Figure 2: North Base Study Area**



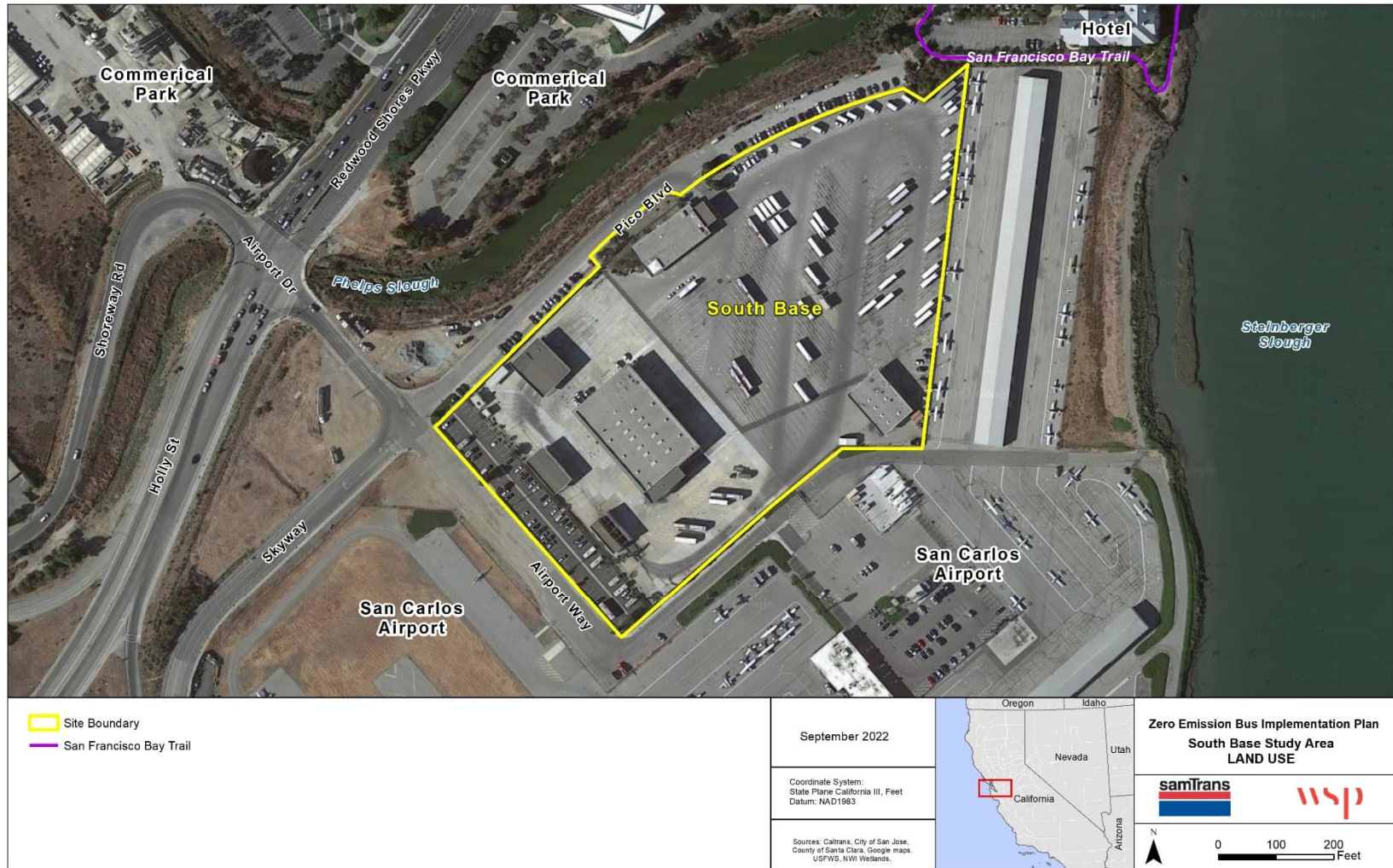
Figure 3: South Base Study Area



**Figure 4: North Base Land Use**



Figure 5: South Base Land Use



## ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project (i.e., the project could result in at least one potentially significant impact to the resource). Please see the checklist on the following pages for additional information.

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

## DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Hilda Lafebre*

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Signature

Hilda Lafebre, Deputy Director, Capital Projects &  
Environmental Compliance

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Printed Name

August 31, 2022

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Date

Date

## Part II Evaluation of Environmental Impacts

This Draft Initial Study (IS) uses the environmental checklist form presented in Appendix G of the California Environmental Quality Act (CEQA) Guidelines. The following terminology is used to evaluate the level of significance of impacts that would result from the proposed plan:

- A finding of *no impact* is made when the analysis concludes that the proposed plan would not affect the particular environmental issue.
- An impact is considered *less than significant* if the analysis concludes that there would be no substantial adverse change in the environment and that no mitigation is needed.
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that there would be no substantial adverse change in the environment with the inclusion of the mitigation measure(s) described.
- An impact is considered *significant* or *potentially significant* if the analysis concludes that there could be a substantial adverse effect on the environment.
- *Mitigation* refers to specific measures or activities adopted to avoid an impact, reduce its severity, or compensate for it.



<b>I. AESTHETICS:</b> Except as provided in Public Resources Code Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a. Have a substantial adverse effect on a scenic vista?**

A scenic vista is typically considered an aesthetically pleasing view as seen from a particular vantage point. In the vicinity of North Base and South Base, scenic vistas are available from the San Francisco Bay Trail across the San Francisco Bay. The proposed project will include the installation of 22-foot canopies for BEB charging stations at each base. These canopies will be installed within the existing property boundaries of each base and will not block vistas of the San Francisco Bay from publicly accessible locations. In addition, there are already structures at and nearby each base that are higher than 22 feet. Therefore, there will be **no impact**.

**b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?**

There are no scenic trees, rock outcroppings, historic buildings, state scenic highways, or other scenic resources in the vicinity of North Base or South Base.<sup>1</sup> Therefore, there will be **no impact**.

**c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?**

Both North Base and South Base are located in urban areas.

<sup>1</sup> Caltrans. Scenic Highways. Available at <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed June 23, 2022.

North Base is located within the City of South San Francisco in a Public/Quasi-Public (PQP) zoning district.<sup>2</sup> In PQP districts, structures are limited to 30 feet in height, and buildings must be set back 10 feet from the street and 5 feet from side and rear property lines when abutting non-residential districts.<sup>3</sup>

South Base is located within the City of San Carlos in a Public (P) zoning district.<sup>4</sup> In P districts, structures are limited to 30 feet in height, and buildings must be set back 30 feet from the street, 20 feet from the rear lot line, and 10 feet from side lot lines. A minimum of 10 percent of the site must be landscaped.<sup>5</sup>

The proposed project will include 22-foot-high canopies that will be set back from the street and adjacent properties in accordance with the zoning regulations. The project will not conflict with applicable zoning regulations governing scenic quality. Therefore, there will be **no impact**.

**d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?**

The proposed canopies for BEB infrastructure may include downward-facing lighting to illuminate the areas beneath the canopies. Lighting will be designed and installed such that it is deflected away from adjacent properties and public streets, and to prevent adverse interference with the normal operation or enjoyment of surrounding properties.

Photo voltaic panels installed on canopies will be designed and installed to meet the requirements of the City of South San Francisco and City of San Carlos municipal codes such that glare will not affect daytime views in the area.

The impact will be **less than significant**.

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<sup>2</sup> City of South San Francisco. Zoning Search (Map). Available online: <https://zoning.ssf.net/>. Accessed April 12, 2022.

<sup>3</sup> City of South San Francisco. Zoning Ordinance. Available online: [https://library.qcode.us/lib/south\\_san\\_francisco\\_ca/pub/municipal\\_code/item/title\\_20-chapter\\_20\\_120-20\\_120\\_002](https://library.qcode.us/lib/south_san_francisco_ca/pub/municipal_code/item/title_20-chapter_20_120-20_120_002). Accessed April 12, 2022.

<sup>4</sup> City of San Carlos Zoning Map. Effective December 28, 2011. Available online: <https://www.cityofsancarlos.org/Home/ShowDocument?id=656>. Accessed April 12, 2022.

<sup>5</sup> City of San Carlos Zoning Ordinance. Available online: <https://www.codepublishing.com/CA/SanCarlos/#!/SanCarlos18/SanCarlos1808.html#18.08.020>. Accessed April 12, 2022.

## II. AGRICULTURE AND FOREST RESOURCES:

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### a. 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?

According to 2016 data provided by the California Department of Conservation's Farmland Mapping & Monitoring Program, San Mateo County has 1,946 acres of prime farmland, 141 acres of farmland of statewide importance, 2,149 acres of unique farmland, and 716 acres of farmland of local importance.<sup>6</sup> Most of this farmland is located in rural areas along the coast or in the southern half of the County.<sup>7</sup> Neither North Base nor South Base are located on mapped important farmlands, and no important farmlands are nearby.

<sup>6</sup> California Department of Conservation. Farmland Mapping & Monitoring Program: 2014–2016 Farmland Conversion Report. Available at [https://www.conservation.ca.gov/dlrp/fmmp/Pages/2014-2016\\_Farmland\\_Conversion\\_Report.aspx](https://www.conservation.ca.gov/dlrp/fmmp/Pages/2014-2016_Farmland_Conversion_Report.aspx), accessed April 12, 2022.

<sup>7</sup> California Department of Conservation. San Mateo County Important Farmland 2018. Available at <https://www.conservation.ca.gov/dlrp/fmmp/Pages/SanMateo.aspx>, accessed April 12, 2022.

The proposed project does not include development in farmland, nor does it propose any type of physical development or construction that will result in conversion of these resources to non-agricultural resources. Therefore, there will be **no impact**.

**b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

Neither North Base nor South Base are zoned for agricultural use. According to the City of South San Francisco Zoning Map, North Base is zoned PQP: Public/Quasi-Public. Government offices, park and recreation facilities, public safety facilities, and parking are permitted uses. Schools, cultural institutions, and utilities are conditionally permitted uses. According to the City of San Carlos Zoning Map, South Base is zoned P: Public. Government offices, park and recreational facilities, public safety facilities, and utilities are permitted uses. Schools, clinics, and other institutional uses are conditionally permitted uses.

Neither North Base nor South Base are subject to Williamson Act contracts.<sup>8</sup>

The proposed plan does not include any type of physical development or construction in areas zoned for agriculture or subject to a Williamson Act contract. Therefore, there will be **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))?**

Neither North Base nor South Base are zoned for forest land or timberland uses. As indicated in response to Question (II)(b), both bases are zoned for P or PQP use.

The proposed project will not conflict with existing zoning for, or cause rezoning of, any forest land or timberland. Therefore, there will be **no impact**.

**d. Result in the loss of forest land or conversion of forest land to non-forest use?**

The proposed project will not remove or convert any forest land. Therefore, there will be **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 forest land to non-forest use?**

The proposed plan does not involve changes that will result in converting farmland to non-agricultural uses. Therefore, there will be **no impact**.

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<sup>8</sup> San Mateo County. Williamson Act Parcels (Interactive Map). Available online: <https://data.smcgov.org/Housing-Development/Williamson-Act-Parcels/sq6e-7j5j>. Accessed April 12, 2022.

### III. AIR QUALITY:

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Ambient air quality standards are set to protect public health. San Mateo County is designated by the U.S. Environmental Protection Agency (EPA) as a non-attainment area for the National Ambient Air Quality Standards for two criteria pollutants: ozone and fine particulates (PM<sub>2.5</sub>).<sup>9</sup> San Mateo County is also designated as a non-attainment area by CARB for state air quality standards for ozone, PM<sub>2.5</sub>, and coarse particulates (PM<sub>10</sub>).<sup>10</sup> Plans to improve air quality and attain ambient air quality standards in the Bay Area are developed by the Bay Area Air Quality Management District (BAAQMD), in cooperation with the Metropolitan Transportation Commission and the Association of Bay Area Governments.

The proposed project will result in temporary emissions from equipment exhaust and fugitive dust during the construction at both North Base and South Base. The following BAAQMD construction air quality best management practices (BMPs) will be incorporated into the project to avoid and minimize construction-related impacts:

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, and graded areas) will be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off-site will be covered.

<sup>9</sup> EPA. Green Book: California Non-attainment/Maintenance Status for Each County by Year for All Criteria Pollutants. September 30, 2021. Available at [https://www3.epa.gov/airquality/greenbook/anayo\\_ca.html](https://www3.epa.gov/airquality/greenbook/anayo_ca.html), accessed June 15, 2022.

<sup>10</sup> CARB. Maps of State and Federal Area Designations. Available at <https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations>, accessed June 15, 2002.

3. 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.
4. All vehicle speeds on unpaved temporary access roads will be limited to 15 mph.
5. All areas to be paved will be completed as soon as possible.
6. Idling times will be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes. Clear signage will be provided for construction workers at all access points.
7. All construction equipment will be maintained and properly tuned in accordance with manufacturer's specifications. All equipment will be checked by a certified mechanic and determined to be running in proper condition prior to operation.
8. A publicly visible sign will be posted with the telephone number and person to contact at the District regarding dust complaints. This person will respond and take corrective action within 48 hours. BAAQMD's phone number will also be visible to ensure compliance with applicable regulations.

The proposed project entails re-purposing the existing bus maintenance-operations facilities at North Base and South Base from diesel fuel to BEBs and FCEBs. Therefore, after construction, the project will result in reduction in air pollutant emissions from buses assigned to these bus bases that operate on routes throughout the District's service area.

**a. Conflict with or obstruct implementation of the applicable air quality plan?**

For North Base, the City of South San Francisco General Plan was reviewed to identify potentially relevant air quality policies.<sup>11</sup> The proposed project is consistent with the General Plan policies to reduce particulate emissions from construction activities through standard use of BAAQMD construction BMPs (Policy 7.3-I-3), encourage clean energy and fuel use (Policy 7.3-I-13), work toward improving air quality by reducing the generation of air pollutants from mobile sources (Policy 7.3-G-1), and promote clean and alternative fuel combustion in vehicles (Policy 7.3-G-5).

For South Base, the City of San Carlos General Plan was reviewed to identify potentially relevant air quality policies.<sup>12</sup> The proposed project is consistent with the General Plan policies to support and comply with BAAQMD, state, and federal standards to improve air quality in the Bay Area (Policy EM-6.1) and reduce particulate emissions from construction activities through standard use of BAAQMD construction BMPs (Policy EM-6.6).

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<sup>11</sup> City of South San Francisco. 1999. General Plan. Available online: <https://www.ssf.net/departments/economic-community-development/planning-division/general-plan>. Accessed June 15, 2022.

<sup>12</sup> City of San Carlos. 2009. General Plan. Available online: <https://www.cityofsancarlos.org/Home/ShowDocument?id=1105>. Accessed June 15, 2022.

BAAQMD's Bay Area 2017 Clean Air Plan was reviewed for potentially applicable policies.<sup>13</sup> The proposed project is consistent with policies such as Transportation Control Measure 3: "Fund local and regional bus projects, including operations and maintenance" and Mobile Source Measure A2: "Increase the adoption of zero emission and plug-in hybrid vehicles and an expanded regional charging network with new stations." Other policies of the Clean Air Plan are not applicable, including policies pertaining to automobile and truck sources (which the proposed project will have no effect on) and policies pertaining to wood burning, stationary and area sources, or land use.

In conclusion, the proposed project will not obstruct implementation of the applicable air quality plans, and there will be **no impact**.

**b. 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?**

Temporary Construction Impact

The proposed project will not exceed any BAAQMD preliminary screening criteria for construction-related impacts: construction activities will not include building demolition, simultaneous occurrence of more than two construction phases, simultaneous construction of more than one land use type, extensive site preparation, extensive material transport, or construction of new buildings. BAAQMD construction air quality BMPs will be incorporated into the project.

Significance thresholds for temporary construction air quality impacts were based on the 2017 BAAQMD CEQA thresholds.<sup>14</sup> Specifically, the significance thresholds are daily average construction emissions exceeding any of the following: 54 pounds (lbs)/day Reactive Organic Gases (ROG), 54 lbs/day nitrogen oxides (NOx), 82 lbs/day PM<sub>10</sub> (exhaust only), or 54 lbs/day PM<sub>2.5</sub> (exhaust only).

The magnitude of construction emissions was estimated using a series of conservative default assumptions from the California Emissions Estimator Model (CalEEMod) version 2020.4.0. CalEEMod is a statewide land use emissions model that provides estimates for construction phasing, off-road equipment, dust from material movement, demolition, trips and vehicle miles traveled, on-road fugitive dust, and architectural coatings based on basic project information. Construction was assumed to take place in 2023 and 2024. The detailed calculations are presented in Appendix A.

As shown in **Table 1**, average daily emissions of ROG, PM<sub>10</sub>, and PM<sub>2.5</sub> will be well under the applicable significance thresholds, and temporary construction air quality impacts will be **less than significant**.

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<sup>13</sup> BAAQMD. 2017. Spare the Air: Cool the Climate: Final 2017 Clean Air Plan. Available online: [https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a\\_-\\_proposed-final-cap-vol-1-pdf.pdf?la=en](https://www.baaqmd.gov/~media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-_proposed-final-cap-vol-1-pdf.pdf?la=en). Accessed Jun 15, 2022.

<sup>14</sup> BAAQMD. 2017. CEQA Air Quality Guidelines. Available online: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa\\_guidelines\\_may2017-pdf.pdf?la=en](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en). Accessed Jun 15, 2022.

**Table 1: Temporary Construction Emissions**

	<i>Maximum Daily Emissions (lbs/day)</i>			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> (exhaust)	PM <sub>2.5</sub> (exhaust)
<i>North Base</i>	5.1	16.4	1.8	1.0
<i>South Base</i>	7.5	17.3	2.3	1.1
<i>Total Project</i>	12.6	33.7	4.1	2.1
<i>BAAQMD Thresholds</i>	54	54	82	54
<i>Threshold Exceeded?</i>	No	No	No	No

Long-Term Operation Impact

As indicated above, the proposed project will result in a reduction in air pollutant emissions from buses. Therefore, it will not result in a significant contribution of any criteria pollutant for which the project region is in non-attainment. Therefore, there will be **no impact**.

**c. Expose sensitive receptors to substantial pollutant concentrations?**

Temporary Construction Impact

From North Base, the nearest residential receptors are located at Safe Harbor Shelter, at 295 N. Access Road, approximately 400 feet from the nearest construction activity. From South Base, the nearest residential receptors are located more than 0.25 miles northeast. The proposed project will incorporate construction air quality BMPs such that substantial concentrations of pollutants will not occur near these receptors. Sensitive receptors will not be exposed to substantial pollutant concentrations. Therefore, the impact will be **less than significant**.

Long-Term Operation Impact

As noted above, the proposed project will result in reduction of air pollutant emissions. Therefore, there will be **no impact**.

**d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?**

Temporary Construction Impact

During construction, operation of heavy equipment will generate diesel odors on-site and in adjacent areas. Diesel odors will be limited in both temporal and geographic extent by the number of pieces of construction equipment operating at any one time and dispersed by prevailing meteorological conditions. Construction air quality commitments incorporated in the project will also minimize diesel exhaust emissions. The impact will be **less than significant**.

Long-Term Operation Impact

The proposed project will result in transition of existing bus maintenance and fueling operations facilities at North Base and South Base from diesel fuel to BEBs and FCEBs. Therefore, after construction, the project will result in reduction in diesel fumes from buses. There will be **no impact**.



**IV. BIOLOGICAL RESOURCES:**

Would the project:

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

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

The California Natural Diversity Database (CNDDDB), California Native Plant Society (CNPS) Rare Plant Program *Inventory of Rare and Endangered Plants of California*, U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC) tool and other relevant scientific literature, technical databases, resource agency reports, and Federal Register notices and other information published by USFWS and the National Marine Fisheries Service were reviewed to assess the current distribution of ecologically sensitive areas and endangered species in the vicinity of the project areas. Both North Base and South Base were visited in May 2022 to identify biological resources that could be affected by the project, avoidance or minimization measures, or required permits.

No endangered species or ecologically sensitive areas were observed or are expected to occur within North Base or South Base. Construction work will occur in the already developed areas of the North Base and South Base sites, as well as within nearby roadways. There will be **no impact** on special-status species.

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

There are no California Department of Fish and Wildlife (CDFW)-classified sensitive natural communities within North Base or South Base. However, the northern coastal salt marsh (tidal marsh) surrounding the North Base project area is classified as a sensitive natural community. Northern coastal saltmarsh is a wetland plant community found in tidal areas and is dominated by salt-tolerant hydrophytic vegetation that typically forms a dense mat of vegetation. In addition, South Base is located about 120 feet south of National Wetlands Inventory (NWI)-mapped Riverine Habitat in Phelps Slough, as well as 315 feet west of NWI-mapped Estuarine and Marine Wetlands in Steinberger Slough. Phelps Slough lies within the CDFW-mapped Redwood Shores Ecological Reserve.

The project will be almost entirely built within the boundaries of North Base and South Base, except for the connection to PG&E primary services, which will be via local roadways. The project will not impact sensitive natural communities. There will be **no impact**.

**c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

North Base is on a peninsula surrounded by the San Francisco Bay and is approximately 40 feet from San Francisco Bay at its closest point. Wetlands in the USFWS NWI are shown in **Figure 6**. The peninsula is surrounded by Estuarine and Marine Wetland.

South Base is located about 120 feet south of NWI-mapped Riverine Habitat in Phelps Slough, as well as 315 feet west of NWI-mapped Estuarine and Marine Wetlands in Steinberger Slough (**Figure 7**).

The project will be almost entirely built within the boundaries of North Base and South Base, except for the connection to PG&E primary services, which will be via local roadways. As explained in Section X, Hydrology and Water Quality, construction will comply with the National Pollutant Discharge and Elimination System (NPDES)/Construction General Permit, which will ensure that there is siltation or other degradation of off-site wetlands.

There will be **no impact** to wetlands.

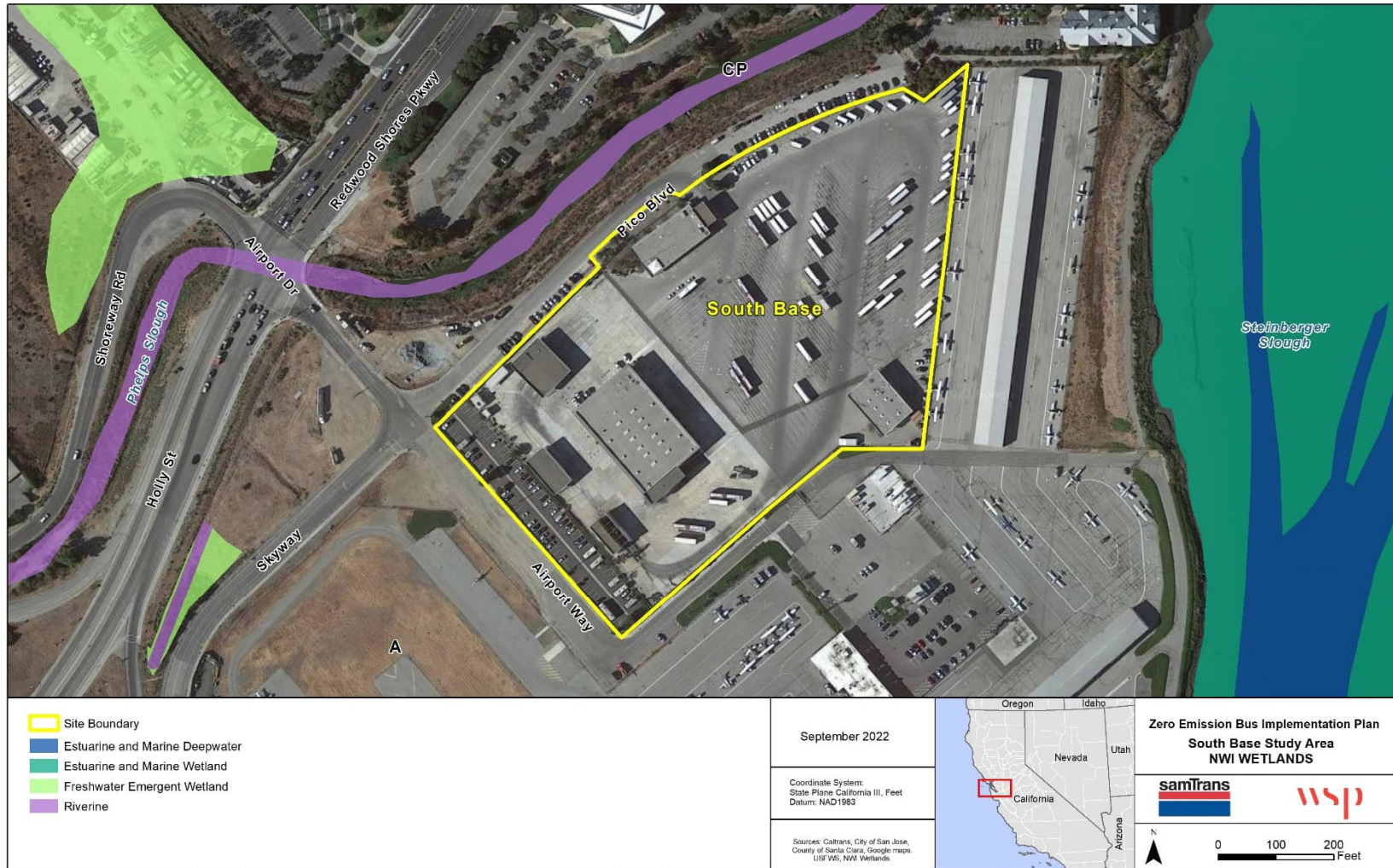
**d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

The project sites do not function as wildlife corridors or wildlife nurseries. Due to habitat fragmentation in the project region, the vegetation communities along streams, sloughs, and other aquatic features often function as environmental corridors that allow animals to move among habitat patches. Both the upland area surrounding the San Francisco Bay Trail near North Base site and Phelps Slough near South Base likely function as wildlife movement corridors. In addition, both North Base and South Base are in the vicinity of San Francisco Bay, which provides aquatic habitats and tidal marsh habitats, and is a stop for birds migrating through the area as part of the Pacific flyway.

**Figure 6: North Base Wetlands**



**Figure 7: South Base Wetlands**



The project will be almost entirely built within the boundaries of North Base and South Base, except for the connection to PG&E primary services, which will be via local roadways. As explained in Section X, Hydrology and Water Quality, construction will comply with the NPDES/Construction General Permit, which will ensure that there is no siltation or other degradation of off-site wetlands and waters.

All migratory bird species and their nests are protected under the Migratory Bird Treaty Act and California Fish and Game Code. If project construction begins during the avian breeding season, pre-construction surveys will be undertaken to determine the presence of nesting birds. If nesting birds are observed, no site disturbance will occur within 250 feet of non-raptor nests and 1,000 feet of raptor nests until the chicks have fledged. These provisions will ensure that project construction complies with the Migratory Bird Treaty Act.

The construction of canopies with solar photo voltaic panels may increase the risk of bird collisions due to the proximity of both bases to tidal marshes and open water habitats of San Francisco Bay. An avian monitoring plan will be developed by a qualified avian ecologist. The plan will focus on post-construction monitoring of the photo voltaic panels for avian fatalities. The purpose of the monitoring will be to determine what type and how many birds are striking the panels, evaluate fatality patterns against published data, and implement measures to avoid or minimize bird strikes.

Therefore, implementation of the proposed project will result in a **less than significant** impact to migratory species.

**e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?**

North Base contains two Peruvian pepper (*Schinus mole*) trees within an island in the middle of the parking lot. Several trees line the perimeter of North Base and provide screening of the site from the surrounding San Francisco Bay Trail. In addition, trees line the entrance roadway. The City of South San Francisco Municipal Code Section 13.30.020 defines “protected trees,” based on factors such as circumference, species, importance to the public (due to location, appearance, historical significance, or other factor), or dependence on others for survival.

South Base contains trees in landscaped islands on the northern edge of the parking lot. The City of San Carlos Municipal Code Section 18.41.020 defines protected trees as any significant tree or heritage tree. Such trees are designated by their circumference, location, and species.

Depending on the ultimate design plans for the bus charging and refueling infrastructure, as well as the PG&E primary service connection, the proposed project may remove or prune trees that are defined as protected trees by South San Francisco’s and San Carlos’s municipal codes, or trees that provide visual screening from the San Francisco Bay Trail. Once the required tree removal plan is identified, the District will identify any protected trees that may be affected by the proposed project. The District will comply with municipal code governing protected tree removal or pruning.

For trees to remain at each base, prior to construction a tree protection zone will be established around the trees within or adjacent to the impact areas. No heavy machinery will be allowed to pass through or park within this area, nor should debris, tools, or other materials be stored within the tree protection zone or against tree trunks.

There will be **no impact**.

**f. Conflict with the provisions of an adopted Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or other approved local, regional, or state habitat conservation plan?**

USFWS has authorized the PG&E Bay Area Habitat Conservation Plan, which applies to North Base and South Base.<sup>15</sup> The proposed connection to PG&E direct service will not conflict with the adopted HCP. There will be **no impact**.

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<sup>15</sup> ICF. Bay Area Habitat Conservation Plan: Operations & Maintenance. Prepared for PG&E. September 2017. Available at [https://ecos.fws.gov/docs/plan\\_documents/thcp/thcp\\_2897.pdf](https://ecos.fws.gov/docs/plan_documents/thcp/thcp_2897.pdf), accessed June 10, 2022.

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

The District contacted the California Historical Resources Information System (CHRIS) Northwest Information Center (NWIC) to identify the previous surveys in the project vicinity and previously recorded sites and structures within a 1.6-kilometer (1.0-mile) radius of each base. The NWIC request included archaeological and non-archaeological resource records, previous reports, shapefiles of surveys and sites, California Office of Historic Preservation (OHP) historic property directory listings, OHP archaeological determinations of eligibility, California Inventory of Historical Resources (1976), Caltrans Bridge Survey, and ethnographic and historical literature.

Archaeological Resources

The records search identified no archaeological sites at North Base. The nearest previously identified archaeological site, the North Colma Creek Site (P-41-002164; CA-SMA-000380), which contains pre-historic shell midden, is more than 1,000 feet away.

The records search identified no archaeological sites at South Base, and no previously identified archaeological sites are within a 1-mile radius of South Base.

Architectural Resources

Records search results show a single architectural resource previously recorded in the project area: the North Base facility itself was recorded in 1998. This resource was recommended as not eligible for listing in the National Register of Historic Places (NRHP). An additional 27 architectural resources were previously recorded within a 1-mile radius, of which three buildings composing the Coast Guard Air Station San Francisco Historic District were recommended as eligible for the NRHP.

The records search identified no architectural resources within a 1-mile radius of South Base.

**a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?**

As described above, no historic resources meet the criteria of §15064.5 in the project area. Therefore, there will be **no impact**.

**b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?**

As discussed above, there are no known historic or prehistoric buried archaeological resources in the project area. The project will involve limited ground disturbance for milling and paving at South Base. Deeper disturbance will be limited to the placement of new piles to support the

overhead canopies. If an unanticipated archaeological resource is discovered during construction, construction will be halted in the area of the find until an archaeologist assesses the resource. Therefore, there will be **no impact**.

**c. Disturb any human remains, including those interred outside of dedicated cemeteries?**

No known human burials or remains are within either North Base or South Base, and no evidence suggesting human remains may be present was identified in the geoarchaeological corings. In the unlikely event that human remains are uncovered, the District will stop work in the area where burial finds are discovered, and conduct the notifications and coordination required by law with the County Coroner and California Native American Heritage Commission. Therefore, there will be **no impact**.



<b>VI. ENERGY:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**

Construction of the proposed project will require a temporary and short-term increase in energy consumption relative to existing conditions. Construction energy consumption will include worker and truck trips and operation of construction equipment. Construction commitments incorporated into the proposed project for purposes of minimizing temporary construction air quality impacts will also serve to reduce energy consumption (e.g., restricting idling time to 2 minutes and requiring the use of newer construction equipment).

The proposed project will not change SamTrans routes or service. It will not result in wasteful or inefficient or unnecessary operational energy consumption.

Therefore, there will be **no impact**.

**b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

The Zero Emissions Fleet Transition Plan illustrates how the District plans to transition its existing diesel bus fleet towards a full ZEB fleet. The transition from diesel buses will allow the District to source renewable electricity for BEBs or hydrogen produced with renewable power for FCEBs, respectively. The proposed project entails the installation of infrastructure to allow for this fleet transition. Therefore, the proposed project does not conflict with the Zero Emissions Fleet Transition Plan or any other state or local plan for renewable energy or energy efficiency.

Therefore, there will be **no impact**.

<b>VII. GEOLOGY/SOILS:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Geotechnical testing was undertaken to evaluate the subsurface conditions at North Base and South Base.<sup>16</sup> The exploration entailed three borings at North Base and two borings at South Base, as well as additional surficial soil sampling. Based on these borings, the geotechnical exploration made earthwork recommendations to address expansive soils, as well as recommendations for on-site clearing, grading, and fill where necessary. The exploration also recommended installation of cast-in-drilled-hole piers to support charging canopies to address structural loads and seismic stability. The proposed project will be installed in accordance with the earthwork recommendations and foundation recommendations included in the geotechnical report.

<sup>16</sup> ENGE0. 2022. SamTrans Preliminary Design of Electrical Infrastructure Upgrades for Bus Maintenance Facilities: Geotechnical Exploration. January 12.

- 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? Refer to Division of Mines and Geology Special Publication 42.**

The nearest earthquake fault, the San Andreas Fault, is located 3 miles southwest of North Base and 4.5 miles southwest of South Base.<sup>17</sup> Therefore, neither North Base nor South Base will be affected by fault rupture. There will be **no impact**.

ii. **Strong seismic ground shaking?**

An earthquake of moderate to high magnitude generated within the San Francisco Bay region could cause considerable ground shaking at both North Base and South Base. Proposed structures will be designed in compliance with the 2019 California Building Code requirements, at a minimum. Conformance to the current building code recommendations does not constitute a guarantee that significant structural damage will not occur in the event of a maximum magnitude earthquake; however, it is reasonable to expect that a well-designed and well-constructed structure will not collapse or cause loss of life in a major earthquake. Therefore, there will be **no impact**.

iii. **Seismic-related ground failure, including liquefaction?**

According to the San Mateo County Planning and Building Department, both North Base and South Base are located in areas with high potential for liquefaction.<sup>18</sup>

However, based on the geotechnical borings undertaken for the proposed BEB canopies at North Base, the potential liquefaction or lateral spreading is localized to only a small portion of the Base, and total liquefaction-induced settlement at the North Base ranges from 0.5 to 1 inch during earthquake shaking.

The geotechnical borings encountered clayey sand beneath South Base, which is not susceptible to liquefaction or lateral spreading.

The proposed project will be installed in accordance with the earthwork recommendations and foundation recommendations included in the geotechnical report. Therefore, there will be **no impact**.

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<sup>17</sup> USGS. The San Andreas Fault and Other Bay Area Faults. Available at <https://earthquake.usgs.gov/earthquakes/events/1906calif/virtualtour/bayarea.php>, accessed June 10, 2022.

<sup>18</sup> San Mateo County Planning and Building. Earthquake Liquefaction (Map). Available at <https://www.smcgov.org/media/73081/download?inline=>, accessed June 10, 2022.

#### iv. Landslides?

According to the San Mateo County Planning and Building Department, neither North Base nor South Base are located in areas susceptible to landslide.<sup>19</sup> Therefore, there will be **no impact**.

#### b. Result in substantial soil erosion or the loss of topsoil?

The proposed project will redevelop existing paved parking lots. Although trenching, milling, and paving will be required, as further described in Section X, Hydrology and Water Quality, construction will comply with all applicable stormwater pollution prevention requirements. The project will not result in soil erosion or loss of topsoil. There will be **no impact**.

#### 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?

The proposed project is not located on a geologic unit that is unstable or would become unstable as a result of the proposed project. At North Base, the geotechnical borings encountered medium-dense to dense clayey sand and silty sand to the bottom of the borings (51.5 feet below ground surface). At South Base, the geotechnical borings encountered very stiff lean clay 20 feet below ground surface, and very stiff fat clay (Old Bay Clay) from 45 feet below ground surface to the bottom of the boring (51.5 feet below ground surface). These are not geologic units subject to landslide, lateral spreading, subsidence, or collapse.

The proposed project will be installed in accordance with the earthwork recommendations and foundation recommendations included in the geotechnical report. Therefore, there will be **no impact**.

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

The geotechnical investigation encountered moderate to highly expansive fat clay near the surface at both North Base and South Base.

Expansive soil changes in volume with changes in moisture. It can shrink or swell and cause heaving and cracking of slabs-on-grade, pavements, and structures founded on shallow foundations. Building damage due to volume changes associated with expansive soil can be reduced by: (1) using a rigid mat foundation that is designed to resist the settlement and heave of expansive soil, (2) deepening the foundations to below the zone of moisture fluctuation, i.e., by using deep footings or drilled piers, and/or (3) using footings at normal shallow depths but bottomed on a layer of select fill having a low expansion potential.

To address expansive soils, the geotechnical report recommends that the upper 18 inches of the structural pad extending at least 5 feet laterally beyond canopies be underlain by non-expansive fill.

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<sup>19</sup> San Mateo County Planning and Building. Existing Landslides (Map). Available at <https://www.smcgov.org/media/73076/download?inline=>, accessed June 10, 2022.

The proposed project will be installed in accordance with the earthwork recommendations and foundation recommendations included in the geotechnical report. Therefore, there will be **no impact**.

**e. Have 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?**

No septic tanks or wastewater disposal systems are associated with the proposed project. Therefore, there will be **no impact**.

**f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?**

Neither North Base nor South Base includes known unique paleontological resources or geologic features. Therefore, there will be **no impact**.

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

**a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**

The proposed project will result in temporary greenhouse gas emissions during the construction period. Temporary greenhouse gas emissions are not considered significant; the BAAQMD CEQA threshold for land use projects applies to long-term emissions only. Air quality construction BMPs such as idling restrictions and the use of newer equipment will serve to minimize temporary construction emissions of greenhouse gases.

The proposed project will allow replacement of diesel buses with BEBs and FCEBs. Diesel buses generate 2.9 well-to-wheel<sup>20</sup> grams of carbon-dioxide-equivalent (CO<sub>2</sub>e) emissions per mile, BEBs generate an average of 0.6 grams of CO<sub>2</sub>e per mile, and FCEBs generate between 0.1 and 2.7 grams of CO<sub>2</sub>e per mile (depending on the power source used to produce the hydrogen). Therefore, post-construction, the proposed project will result in a long-term reduction in greenhouse gas emissions.

Therefore, there will be **no impact**.

**b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

The purpose of the proposed project is to install the necessary BEB and FCEB infrastructure at North Base and South Base to allow transition from diesel buses to BEBs and FCEBs. This transition will meet the goals of the District's Zero Emissions Fleet Transition Plan, which lays out how the District will meet the CARB mandate that California transit bus fleets must be zero-emission by 2040. The District will meet the mandate six years before the deadline, in 2034.

Therefore, there will be **no impact**.

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<sup>20</sup> Well-to-wheel emissions include all emissions related to fuel production, processing, distribution, and use.

**IX. HAZARDS AND HAZARDOUS MATERIALS:**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

FCEBs will require that hydrogen is delivered on a regular basis. The hydrogen will be stored in on-site tanks. Hydrogen will be transported and stored in accordance with proper and established safety protocols.

The District will develop a “Bus Maintenance Electrical Safety Program” (BMESP) which will serve as a comprehensive training plan that addresses the operation, diagnosis, troubleshooting, repair, and preventative maintenance of ZEBs. All BEB and FCEB curriculum will be developed, reviewed, and jointly approved by the District Management or Staff, International Brotherhood of Teamsters (Teamsters) Local 856, and Amalgamated Transit Union (ATU) Local 1574 via the established Zero Emissions Technology Committee (ZET).

Existing operations at each base require the transport, storage, and use of a small amount of hazardous materials for bus maintenance, such as oils, solvents, and cleaning agents. The proposed project will not introduce the routine transport, use, or disposal of additional hazardous materials.

Therefore, there will be **no impact**.

**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?**

Construction of the proposed project will comply with standard BMPs, such as requirements of a Stormwater Pollution Prevention Plan (SWPPP), which will minimize the potential for release of hazardous materials to the environment and ensure that any spills are promptly cleaned up.

Regarding operations, the proposed project will not create conditions that would create a significant hazard as a result of accidents. As indicated under Section IX(a), the District will develop a BMESP which will serve as a comprehensive training plan that addresses the operation, diagnosis, troubleshooting, repair, and preventative maintenance of ZEBs.

Therefore, there will be **no impact**.

**c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?**

Neither North Base nor South Base are located within one-quarter mile of an existing or proposed school. Therefore, there will be **no impact**.

**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?**

To determine whether hazardous materials are potentially present at each base, an environmental database search was undertaken.

At North Base, no federal National Priority List (Superfund) or Hazardous Waste sites were identified. North Base itself (site T0608100723) is the only known or potentially contaminated area of concern (AOC) identified nearby; the base was a leaking underground storage tank (LUST) cleanup site. The case was opened June 29, 1993 and closed on July 26, 2002.

Four AOCs were identified within the study area of the South Base facility on the state database, and one AOC was identified on the federal database. AOCs on the state database include:

- South Base. The record relates to a LUST cleanup site (diesel fuel) at South base. Cleanup of the site was completed in October 2002.
- Beco Inc., Fuel Storage Facility (T0608161648), located at 620 Airport Way, San Carlos, directly south of South Base. The record relates to a LUST cleanup site (gasoline). Cleanup of the site was completed in June 2008.
- Chevron Concession (T0608121614), located at 620 Airport Way, San Carlos, directly south of South Base. The record relates to a LUST cleanup site (aviation fuel). Cleanup of the site was completed in July 2009.
- Redwood Shores II (T0608101039), located at 0 Pico, Redwood City, 200 feet northwest of South Base. The record relates to a LUST cleanup site (diesel fuel). Cleanup of the site was completed in March 2001.



Near South Base, one facility was identified on the federal database. The site, identified as Chuck Aircraft Inc., is located at 670 Airport Way, San Carlos, directly adjacent to South Base. It is a Resource Conservation and Recovery Act Information System, Small Quantity Generator facility with no violations identified. No federal National Priority List (Superfund) or Hazardous Waste sites were identified.

Therefore, construction of the proposed project is not expected to result in adverse effects related to hazardous materials. If unexpected contamination is encountered, the District will dispose of it through standard BMPs in accordance with federal and state regulations.

There will be **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 for people residing or working in the project area?**

North Base is located within the San Francisco International Airport Land Use Compatibility Plan (ALUCP) Zone 3 – Inner Turning Zone. In Zone 3, schools, hospitals/nursing homes, day care centers, stadiums, biosafety facilities,<sup>21</sup> and critical public utilities<sup>22</sup> are considered incompatible uses. See **Figure 8**.

Portions of South Base are located within San Carlos Airport ALUCP Zone 2 – Inner Approach/Departure Zone, Zone 3 – Inner Turning Zone, and Zone 6 – Traffic Pattern Zone. In these zones, schools, hospitals/nursing homes, day care centers, stadiums, biosafety facilities, critical public facilities, hazardous uses,<sup>23</sup> and theaters are considered incompatible uses. See **Figure 9**.

The proposed project will maintain the existing bus maintenance, storage, and fueling uses at each base. The District will develop a BMESP which will serve as a comprehensive training plan that addresses the operation, diagnosis, troubleshooting, repair, and preventative maintenance of ZEBs. All BEB and FCEB curriculum will be developed, reviewed, and jointly approved by the District Management or Staff, International Brotherhood of Teamsters (Teamsters) Local 856, and Amalgamated Transit Union (ATU) Local 1574 via the established Zero Emissions Technology Committee (ZET).

Hydrogen will be transported, handled, and stored in accordance with proper and established safety protocols. Therefore, there will be **no impact**.

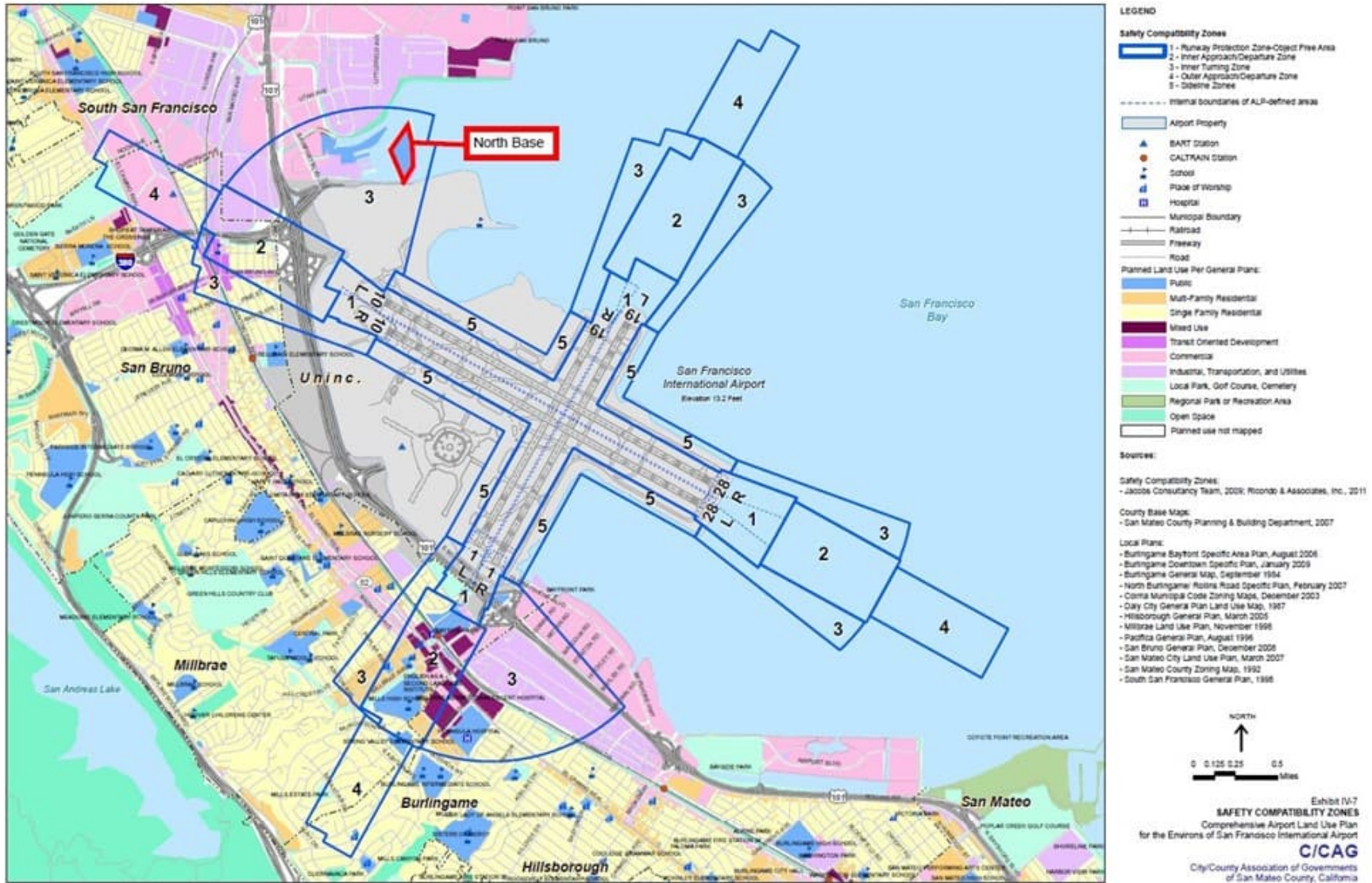
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<sup>21</sup> Biosafety facilities are medical and biological research facilities involving the storage and processing of extremely toxic or infectious agents.

<sup>22</sup> Critical public utilities are facilities that, if disabled by an aircraft accident, could lead to public safety or health emergencies. They are electrical power generation plants, electrical substations, wastewater treatment plants, and public water treatment facilities.

<sup>23</sup> Hazardous facilities are uses involving the manufacture, storage, or processing of flammable, explosive, or toxic materials that would substantially aggravate the consequences of an aircraft accident.

**Figure 8: North Base: San Francisco International Airport Land Use Compatibility Plan**



**Figure 9: South Base: San Carlos Airport Land Use Compatibility Plan**



**f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

The proposed project will be built entirely within the existing boundaries of North Base and South Base, with the exception of PG&E direct service connections via local roadways. Therefore, the proposed project will not result in any activity that will impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. There will be **no impact**.

**g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?**

According to data provided on the Fire Hazard Severity Zones Maps developed by the California Department of Forestry, neither North Base nor South Base are located in or near fire hazard severity zones.<sup>24 25</sup> The proposed project will not result in the development or construction of any habitable structures in wildfire hazard areas. Therefore, the proposed project will not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. There will be **no impact**.

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<sup>24</sup> California Department of Forestry & Fire Protection. Fire Hazard Severity Zones in SRA. November 7, 2007. Available at [https://osfm.fire.ca.gov/media/6802/fhszs\\_map41.pdf](https://osfm.fire.ca.gov/media/6802/fhszs_map41.pdf), accessed April 12, 2022.

<sup>25</sup> California Department of Forestry & Fire Protection. Very High Fire Hazard Severity Zones in LRA. November 24, 2008. Available at [https://osfm.fire.ca.gov/media/6800/fhszl\\_map41.pdf](https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf), accessed April 12, 2022.

**X. HYDROLOGY AND WATER QUALITY:**

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) 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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) impede or redirect floodflows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Temporary Construction Impact

In accordance with NPDES General Permit requirements, an SWPPP will be prepared and implemented. The SWPPP will identify BMPs to address pollutant source reduction and provide measures and controls necessary to address potential pollutant sources. Implementation of the SWPPP during construction will reduce temporary potential water quality impacts to a **less than significant** level.

Long-Term Operation Impact

The proposed project will result in installation of BEB and FCEB infrastructure, which will reduce the use of diesel fuel at both North Base and South Base. At South Base, the existing surface parking lot will be milled and re-paved. The City of San Carlos, when reviewing the South Base building permit application, will determine whether the re-paving at South Base qualifies as a “regulated project” pursuant to the San Mateo County Water Pollution Prevention Program (SMCWPPP). If the project qualifies as a “regulated project,” then the District will incorporate

low-impact development (LID) techniques to provide on-site stormwater treatment. If on-site treatment is not feasible, the District will reduce stormwater runoff or achieve “alternative compliance” in lieu of providing on-site treatment.

With implementation of the SWPPP and requirements of the SMCWPPP, if applicable, the proposed project will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The impact will be **less than significant**.

**b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?**

The proposed project will not increase water demand. Regardless, groundwater is not used as water source in the cities of South San Francisco and San Carlos. In addition, both North Base and South Base are existing surface parking lots, and they will remain surface parking lots with implementation of the proposed project. Therefore, groundwater recharge will not be affected. There will be **no impact**.

**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 in a manner which will:**

**i) result in a substantial erosion or siltation on- or off-site;**

During construction, implementation of the SWPPP will reduce the potential for the project to result in substantial erosion or siltation on- or off-site. The impact will be **less than significant**.

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

At North Base, the existing parking lot will remain with the proposed project. At South Base, the existing surface parking lot will be milled and re-paved. Therefore, the proposed project will not increase impervious surfaces and will not increase the rate or amount of surface runoff. There will be **no impact**.

**iii) 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**

As discussed above, because the proposed project will not increase runoff or provide substantial sources of polluted runoff, there will be **no impact**.

**iv) impede or redirect flood flows?**

The proposed project will not alter the existing drainage patterns or otherwise redirect stormwater flows. Stormwater will continue to be directed to existing catch basins and stormwater pipes. There will be **no impact**.

**d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?**

North Base is not located in the 100-year floodplain. According to Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs), North Base is located in a shaded Zone X, which is an area between the limits of the base flood and the 0.2-percent-annual-chance flood, areas of 1 percent annual chance of flooding with depths of less than 1 foot, or areas with drainage areas less than 1 square mile. No base flood elevations are designated for Zone X, and the National Flood Insurance Program does not have a program regulating activities in Zone X. See **Figure 10**.

South Base is not located in the 100-year floodplain. According to FEMA FIRMs, South Base is located in Zone X, as an area within the 500-year flood zone with reduced flood risk due to a levee. A levee owned by Redwood City buttresses the shoreline. As indicated in the February 2021 SamTrans Adaptation and Resilience Plan, the levee was raised in 2011 and designed to meet FEMA standards for a 1 percent annual chance flood. There is a 460-foot-wide gap in the southeastern portion of the levee to allow planes to safely take off and land at San Carlos Airport. The airport installs a temporary barrier to secure the gap during high water events. See **Figure 11**.

According to the California Geologic Survey, North Base is located in a tsunami hazard zone, and South Base is not located in a designed tsunami hazard zone.<sup>26</sup> There are no published maps or hazard information on seiche hazards in the Bay Area.

The proposed project entails continued use of North Base and South Base as bus storage and maintenance locations. It will not introduce new pollutants that could be released due to inundation. There will be **no impact**.

**e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?**

The proposed project will not conflict with, nor will it hinder implementation of, a sustainable groundwater management plan or water quality control plan. Groundwater is not used as a water source in the cities of South San Francisco or San Carlos, and the project will not increase impervious surfaces. Therefore, there will be **no impact**.

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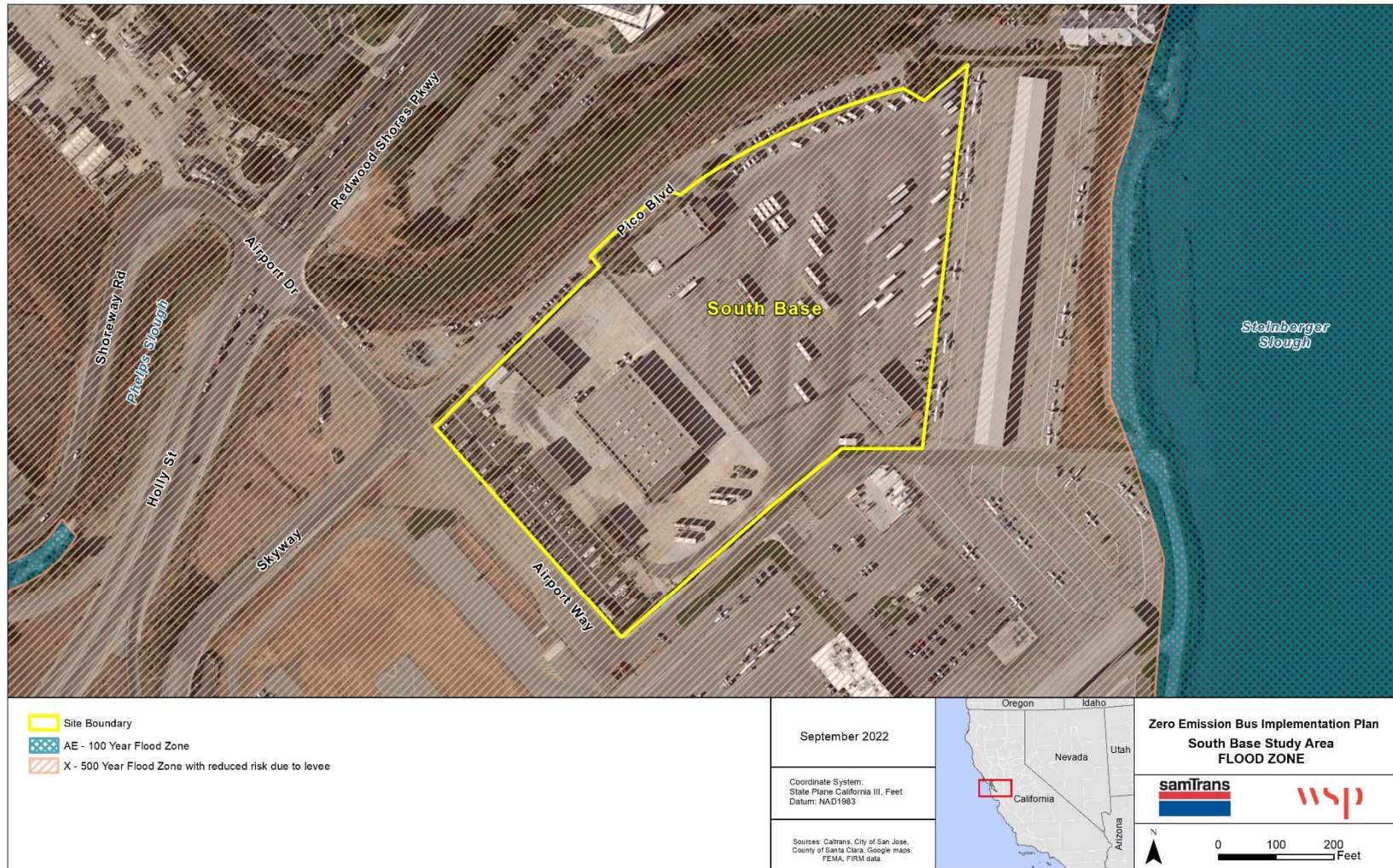
<sup>26</sup> California Department of Conservation. 2022. California Geologic Survey: California Tsunami Maps and Data. Website: <https://www.conservation.ca.gov/cgs/tsunami/maps>. Accessed July 3, 2022.

**Figure 10: North Base Floodplains**





**Figure 11: South Base Floodplains**



<b>XI. LAND USE/PLANNING:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Physically divide an established community?**

Implementation of the proposed project will not result in any activity or the development or construction of any additional physical features or structures that will physically divide an established community. The BEB and FCEB infrastructure will be installed within the boundaries of North Base and South Base. Therefore, there will be **no impact**.

**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?**

North Base is in an area zoned for PQP use by the City of South San Francisco. See **Figure 12**. Parking, fleet-based services, utilities, and government offices are permitted. In addition, North Base is located within the San Francisco International ALUCP Zone 3 – Inner Turning Zone. In Zone 3, schools, hospitals/nursing homes, day care centers, stadiums, biosafety facilities, and critical public utilities are considered incompatible uses. See **Figure 8**.

South Base is in an area zoned for P use by the City of San Carlos. See **Figure 13**. Parking, utilities, and government offices are permitted. Portions of South Base are located within San Carlos Airport ALUCP Zone 2 – Inner Approach/Departure Zone, Zone 3 – Inner Turning Zone, and Zone 6 – Traffic Pattern Zone. In these zones, schools, hospitals/nursing homes, day care centers, stadiums, biosafety facilities, critical public facilities, hazardous uses, and theaters are considered incompatible uses. See **Figure 9**.

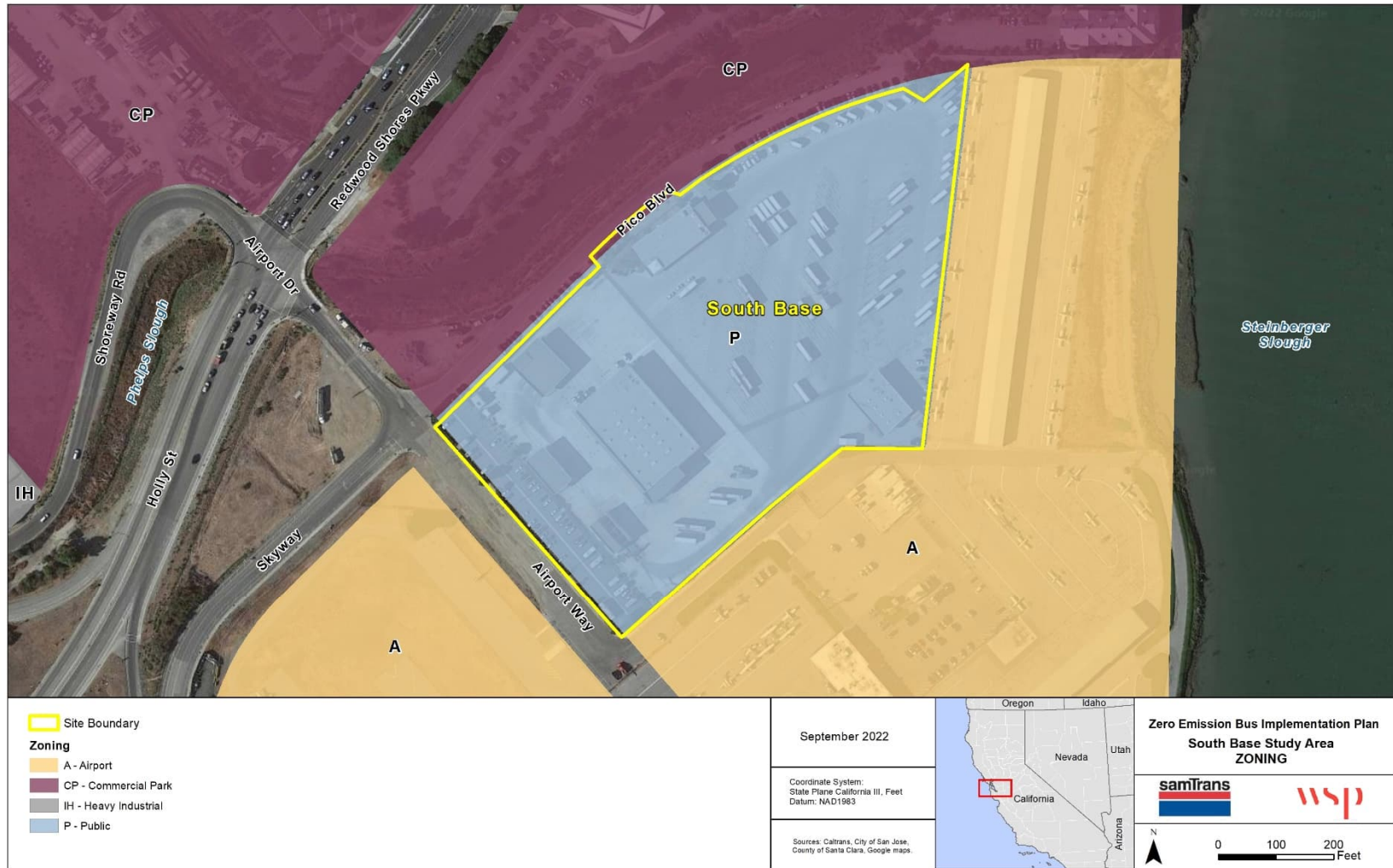
The proposed project will maintain the existing bus maintenance, storage, and fueling uses at each base. The safety measures already in place at both North Base and South Base will be revised to account for operation of the BEB and FCEB technology. Drivers will be trained in the technology and appropriate and safe protocols for site safety. Hydrogen will be transported, handled, and stored in accordance with proper and established safety protocols.

Therefore, the proposed project will not conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. There will be **no impact**.

**Figure 12: North Base Zoning**



Figure 13: South Base Zoning



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

**a. 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?**

***and***

**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?**

The San Mateo County General Plan identifies areas of significant mineral resources in the County.<sup>27</sup> Neither North Base nor South Base are located on a known mineral site or locally important mineral resource recovery site. The proposed project will have no effect on the resources or access to the resources. Therefore, there will be **no impact**.

<sup>27</sup> San Mateo County General Plan. November 1986. Available at <https://planning.smcgov.org/sites/planning.smcgov.org/files/SMC-GP%201986.pdf>, accessed April 12, 2022.

<b>XIII. NOISE:</b> Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Generation of a substantial temporary or 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?**

Regarding construction, for North Base, the City of South San Francisco allows construction activities that are authorized by a valid city permit to occur on weekdays between 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., or at such other hours as may be authorized by the permit, as long as either:

- no individual piece of equipment shall produce a noise level exceeding ninety (90) dB at a distance of twenty-five feet, or
- the noise level at any point outside of the property plane of the project does not exceed 90 dB.<sup>28</sup>

For South Base, the City of San Carlos exempts transportation facilities, including buses, from noise ordinance limitations. San Carlos also exempts construction activities from noise ordinance limitations, as long as such activities are limited to the hours of 8:00 a.m. to 6:00 p.m. Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturdays and Sundays. No construction noise-related activities are allowed on holidays, and all gasoline-powered construction equipment must be equipped with an operating muffler or baffling system as originally provided by the manufacturer, and no modification to these systems is permitted.<sup>29</sup>

The noisiest equipment associated with construction will include excavators (85 A-weighted decibels maximum sound level [dBA Lmax] at 50 feet), jackhammers (88 dBA Lmax at 50 feet), and pavers (89 dBA Lmax at 50 feet). Therefore, if multiple pieces of equipment are operating simultaneously, it is possible that the 90-dBA Lmax threshold for construction noise impacts will

<sup>28</sup> City of South San Francisco. 2022. Municipal Code Chapter 8.32 Noise Regulations. Available online: [https://library.qcode.us/lib/south\\_san\\_francisco\\_ca/pub/municipal\\_code/item/title\\_8-chapter\\_8\\_32-8\\_32\\_050](https://library.qcode.us/lib/south_san_francisco_ca/pub/municipal_code/item/title_8-chapter_8_32-8_32_050). Accessed June 10, 2022.

<sup>29</sup> City of San Carlos. 2022. Municipal Code Chapter 9.30 Noise Control. Available online: <https://www.codepublishing.com/CA/SanCarlos/html/SanCarlos09/SanCarlos0930.html>. Accessed June 10, 2022.

be approached or exceeded at North Base. However, environmental protection features of the proposed project will reduce temporary noise from construction activities, as listed below. The District will comply with all applicable code limitations regarding construction hours.

The following construction noise control measures will be implemented:

- **Construction noise control plan.** The contractor will be required to propose feasible methods of reducing construction noise, such as temporary shrouds around equipment or temporary barriers around particularly noisy activities or activities occurring at night.
- **Construction noise monitoring.** The project will include construction noise monitoring. A long-term unattended noise monitor will be installed to ensure contractor compliance with construction noise mitigation and to enable a proactive response to any problems. The monitoring data will be accessible to the contractor and the District online and will provide automatic notification if preset thresholds are exceeded. The specific details of the noise monitoring will need to be determined as part of a construction noise monitoring plan.
- **Turn off idling equipment.** When not in use, idling equipment will be turned off. All equipment will be turned off within five minutes of idling; diesel equipment will be turned off within two minutes of idling.
- **Use newer equipment with improved noise muffling.** All equipment items will include the manufacturers' recommended noise abatement measures, such as mufflers, engine covers, and engine vibration isolators, intact and operational. Newer equipment will generally be quieter in operation than older equipment. All construction equipment will be inspected at periodic intervals to ensure proper maintenance and presence of noise control devices.

Regarding operations, the proposed project will not result in noise impacts because it will not increase bus volumes. The project will result in a changeover to ZEBs, which will generate less noise than the existing diesel fleet.

Therefore, the impact will be **less than significant**.

#### **b. Generation of excessive groundborne vibration or groundborne noise levels?**

Construction of the proposed project will involve the use of jack hammers, which may generate minimal vibration and groundborne noise. However, there are no vibration-sensitive land uses—such as historic masonry buildings, laboratories, or medical offices with vibration-sensitive equipment or machinery—in in the vicinity of either North Base or South Base. Construction activities will be limited to daytime hours, as required by the South San Francisco and San Carlos municipal codes.

Regarding operations, the proposed project will not result in vibration impacts because it will not increase bus volumes.

The impact will be **less than significant**.

- c. **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?**

North Base is adjacent to San Francisco International Airport. South Base is Adjacent to San Carlos Airport.

District employees work at both North Base and South Base under existing conditions, and they will continue to work at both North Base and South Base with implementation of the proposed project. The proposed project will not increase operational employment at either base. Therefore, there will be **no impact**.



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

**a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

The proposed infrastructure improvements will occur at North Base and South Base. Implementation of the proposed project will not result in development of any new housing or the extension of new physical infrastructure (roads, sewers, electric lines) that will induce development. Therefore, there will be **no impact**.

**b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

The proposed project will not displace any existing people or housing. Therefore, there will be **no impact**.

**XV. PUBLIC SERVICES:**

Would the project:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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- a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks, other public facilities?**

Because the proposed project will not directly or indirectly induce population growth in the area or displace any housing or people, it will not increase demand for fire protection, police protection, schools, parks, or other public facilities or affect levels of those public services. **No impact** on public services will result.

<b>XVI. RECREATION:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**

The proposed project will occur at the existing North Base and South Base facilities. The project will not include any residential or commercial development that will increase use of an existing park or recreational facility. Therefore, there will be **no impact**.

**b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

The proposed project will not construct any new recreational facilities or expand any existing recreational facilities. Therefore, there will be **no impact**.

<b>XVII. TRANSPORTATION/TRAFFIC:</b>	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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project will have no long-term impact on the routes in the SamTrans system.

Portions of each base will be closed to allow for phased installation of overhead canopies and in-ground electrical connections. These closures will temporarily reduce the bus parking capacity at each base. Displaced buses will park in extra available spaces at the other base (i.e., buses displaced from South Base during construction will park at North Base, and vice versa). The South Base parking lot will be milled and repaved, but the project does not entail building demolition or excavation that would result in substantial numbers of truck haul trips.

Connection to dedicated PG&E “primary” services may require temporary lane closures along North Access Road for North Base, as well as along Airport Way and Skyway Road at South Base. If temporary lane closures are required, PG&E will obtain approval from the cities of South San Francisco and San Carlos, respectively.

Temporary construction worker and truck trips will occur during construction, and workers will access the site via Route 101 or Route 280 and local roadways.

**a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?**

The proposed will not conflict with the Reimagine SamTrans plan; City of South San Francisco General Plan; City of San Carlos General Plan; or any other adopted policies, plans, and programs supporting active transportation. The project is supportive of transit system reliability, and the construction phasing will maintain SamTrans service. Therefore, there will be **no impact**.

**b. Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?**

Temporary Construction Impacts

There may be a negligible and temporary increase in vehicle miles travelled during construction of the project, due to worker trips as well as potential off-site storage of buses during phased construction. This potential short-term impact will be **less than significant**.

### Long-Term Operation Impacts

The project will have no long-term effect on vehicle miles traveled. Therefore, there will be **no impact**.

**c. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

The proposed project will include installation of new design features within the boundaries of North Base and South Base to accommodate BEB and FCEB infrastructure. It will not introduce new design features off-site. No new hazards will be introduced. Therefore, there will be **no impact**.

**d. Result in inadequate emergency access?**

The proposed project will have no effect on emergency access. The proposed project does not include new physical infrastructure that will impede emergency response on existing roadways, and existing emergency access to both North Base and South Base will be maintained. Therefore, there will be **no impact**.

**XVIII. 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:

Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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**Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:**

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

There are no known tribal cultural resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historic resources at either North Base or South Base. Therefore, there will be **no impact**.

**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 Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

There are no known resources at North Base or South Base that are anticipated to be culturally significant to a California Native American tribe. As indicated in Section V, Cultural Resources, no cultural resources have been identified at North Base or South Base. In addition, no potential cultural material was identified in the geotechnical boring conducted for the proposed project.

The District contacted eight Native American tribal representatives identified by the California Native American Heritage Commission (NAHC) as potentially interested in the areas of North Base and South Base. No specific information regarding tribal cultural resources was identified as a result of this coordination.

Therefore, there will be **no impact**.

<b>XIX. UTILITIES/SERVICE SYSTEMS:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?**

The proposed project will not increase wastewater production at North Base or South Base. Therefore, there will be **no impact**.

**b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

The proposed project will not increase water demand or wastewater generation. Therefore, it will not require the construction or expansion of treatment facilities. Therefore, there will be **no impact**.

**c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

At both North Base and South Base, the proposed project will not result in the construction of new drainage facilities or the expansion of existing facilities. Existing drainage systems will be used at each site. Therefore, there will be **no impact**.

**d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?**

The proposed project will not generate new water demand. Therefore, there will be **no impact**.

**e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?**

The proposed project will not result in increased wastewater generation. Therefore, there will be **no impact**.

**f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?**

Solid waste generated by the proposed project will be limited to construction waste. Disposal of demolition and construction materials, including any hazardous wastes that may be encountered, will occur in accordance with federal, state, and local regulations. Disposal will occur at permitted landfills. Operation of the project will not result in additional solid waste disposal needs. Therefore, there will be **no impact**.

**g. Comply with federal, state, and local statutes and regulations related to solid waste?**

Implementation of the proposed project will comply with federal, state, and local statutes governing solid waste. Therefore, there will be **no impact**.



<b>XX. WILDFIRE:</b>	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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 risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Substantially impair an adopted emergency response plan or emergency evacuation plan?**

As indicated in Section IX, Hazards and Hazardous Materials, the proposed project will not result in any activity or include or propose the development or construction of any additional physical features or structures that will impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Therefore, there will be **no impact**.

**b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?**

As indicated in Section IX, Hazards and Hazardous Materials, the proposed project will not result in the development or construction of any habitable structures in wildfire hazard areas. Therefore, there will be **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 risk or that may result in temporary or ongoing impacts to the environment?**

The proposed project will include the installation of BEB and FCEB infrastructure. All infrastructure will be installed within the existing boundaries of North Base and South Base, which are existing surface parking lots. Connections to PG&E facilities will be installed within existing streets and on existing PG&E poles.

The project does not require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) in wildfire hazard severity zones. Therefore, the project will not exacerbate fire risk or result in temporary or ongoing impacts to the environment. Therefore, there will be **no impact**.

- d. **Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

The proposed project will not result in the development or construction of any habitable structures in wildfire hazard areas. Therefore, there will be **no impact**.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE:**

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?**

The proposed project would entail installation of BEB and FCEB infrastructure on already developed and highly disturbed existing parking lots, and the project will not result in an adverse effect on special status species or sensitive natural communities. The project will have a net beneficial effect on regional air quality by reducing air pollutant emissions, and the project will have no impact on cultural resources. Plant and animal communities and special-status species will not be substantially affected. Therefore, any potential impacts arising from the implementation of the proposed plan will be **less than significant**.

**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)?**

The impacts of the proposed project will not be cumulatively considerable. The proposed project will not result in substantial physical changes in the environment. In combination with past, present, and reasonably foreseeable future actions—such as the Reimagine SamTrans plan—the proposed project will reduce air pollutant emissions. There will be **no impact**.

**c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?**

The proposed project does not involve features that could cause substantial adverse environmental effects on human beings. Impacts related to air quality, noise, traffic, hazardous materials, and other impact categories affecting human beings will not be significant. There will be **no impact**.

## Appendix A: CalEEMod Calculations

North Base - San Mateo County, Summary Report

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**North Base  
San Mateo, Summary Report**

**1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unenclosed Parking Structure	5.40	Acre	5.40	235,224.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	70
<b>Climate Zone</b>	5			<b>Operational Year</b>	2025
<b>Utility Company</b>					
<b>CO2 Intensity (lb/MWhr)</b>	0	<b>CH4 Intensity (lb/MWhr)</b>	0	<b>N2O Intensity (lb/MWhr)</b>	0

**1.3 User Entered Comments**

Only CalEEMod defaults were used.

Project Characteristics -

Land Use -

**2.0 Peak Daily Emissions**

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**Peak Daily Construction Emissions**

North Base - San Mateo County, Summary Report

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Peak Daily Construction Emissions**

Year	Phase	Unmitigated						Mitigated					
		ROG	NOX	CO	SO2	PM10	PM2.5	ROG	NOX	CO	SO2	PM10	PM2.5
		lb/day											
2023	Demolition	2.3047 W	21.5073 W	19.9463 S	0.0398 S	1.1213 S	0.9612 S	2.3047 W	21.5073 W	19.9463 S	0.0398 S	1.1213 S	0.9612 S
2023	Site Preparation	2.7022 W	27.5517 W	18.6078 S	0.0393 S	21.0716 S	11.3070 S	2.7022 W	27.5517 W	18.6078 S	0.0393 S	21.0716 S	11.3070 S
2023	Grading	1.7465 W	17.9588 W	15.0536 S	0.0307 S	7.9813 S	4.1709 S	1.7465 W	17.9588 W	15.0536 S	0.0307 S	7.9813 S	4.1709 S
2023	Building Construction	1.8491 W	16.4053 W	18.9074 W	0.0418 S	1.7898 W	0.9625 W	1.8491 W	16.4053 W	18.9074 W	0.0418 S	1.7898 W	0.9625 W
2024	Building Construction	1.7351 W	15.4305 W	18.7097 W	0.0414 S	1.7033 W	0.8809 W	1.7351 W	15.4305 W	18.7097 W	0.0414 S	1.7033 W	0.8809 W
2024	Paving	1.0220 W	9.5451 W	14.9100 S	0.0238 S	0.5923 S	0.4642 S	1.0220 W	9.5451 W	14.9100 S	0.0238 S	0.5923 S	0.4642 S
2024	Architectural Coating	5.1320 W	1.2462 W	2.1892 S	4.2700e-003 S	0.2259 S	0.1052 S	5.1320 W	1.2462 W	2.1892 S	4.2700e-003 S	0.2259 S	0.1052 S
	Peak Daily Total	5.1320 W	27.5517 W	19.9463 S	0.0418 S	21.0716 S	11.3070 S	5.1320 W	27.5517 W	19.9463 S	0.0418 S	21.0716 S	11.3070 S
	Air District Threshold												
	Exceed Significance?												

**Peak Daily Operational Emissions**

**Peak Daily Operational Emissions**





South Base - San Mateo County, Summary Report

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**South Base  
San Mateo, Summary Report**

**1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Unenclosed Parking Structure	8.00	Acre	8.00	348,480.00	0

**1.2 Other Project Characteristics**

<b>Urbanization</b>	Urban	<b>Wind Speed (m/s)</b>	2.2	<b>Precipitation Freq (Days)</b>	70
<b>Climate Zone</b>	5			<b>Operational Year</b>	2025
<b>Utility Company</b>					
<b>CO2 Intensity (lb/MWhr)</b>	0	<b>CH4 Intensity (lb/MWhr)</b>	0	<b>N2O Intensity (lb/MWhr)</b>	0

**1.3 User Entered Comments**

Only CalEEMod defaults were used.

Project Characteristics -

Land Use -

**2.0 Peak Daily Emissions**

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**Peak Daily Construction Emissions**

South Base - San Mateo County, Summary Report

**EMFAC Off-Model Adjustment Factors for Gasoline Light Duty Vehicle to Account for the SAFE Vehicle Rule Not Applied**

**Peak Daily Construction Emissions**

Year	Phase	Unmitigated						Mitigated					
		ROG	NOX	CO	SO2	PM10	PM2.5	ROG	NOX	CO	SO2	PM10	PM2.5
		lb/day											
2024	Architectural Coating	7.5148 W	1.2585 W	2.3597 S	4.8600e-003 S	0.3002 S	0.1251 S	7.5148 W	1.2585 W	2.3597 S	4.8600e-003 S	0.3002 S	0.1251 S
2023	Building Construction	1.9798 W	17.3398 W	20.1630 W	0.0487 S	2.3037 W	1.1058 W	1.9798 W	17.3398 W	20.1630 W	0.0487 S	2.3037 W	1.1058 W
2024	Building Construction	1.8597 W	16.3492 W	19.9081 W	0.0482 S	2.2172 W	1.0241 W	1.8597 W	16.3492 W	19.9081 W	0.0482 S	2.2172 W	1.0241 W
2023	Demolition	2.3047 W	21.5073 W	19.9463 S	0.0398 S	1.1213 S	0.9612 S	2.3047 W	21.5073 W	19.9463 S	0.0398 S	1.1213 S	0.9612 S
2023	Grading	1.7465 W	17.9588 W	15.0536 S	0.0307 S	7.9813 S	4.1709 S	1.7465 W	17.9588 W	15.0536 S	0.0307 S	7.9813 S	4.1709 S
2024	Paving	1.0220 W	9.5451 W	14.9100 S	0.0238 S	0.5923 S	0.4642 S	1.0220 W	9.5451 W	14.9100 S	0.0238 S	0.5923 S	0.4642 S
2023	Site Preparation	2.7022 W	27.5517 W	18.6078 S	0.0393 S	21.0716 S	11.3070 S	2.7022 W	27.5517 W	18.6078 S	0.0393 S	21.0716 S	11.3070 S
	Peak Daily Total	7.5148 W	27.5517 W	20.1630 W	0.0487 S	21.0716 S	11.3070 S	7.5148 W	27.5517 W	20.1630 W	0.0487 S	21.0716 S	11.3070 S
	Air District Threshold												
	Exceed Significance?												

**Peak Daily Operational Emissions**

**Peak Daily Operational Emissions**

