

NOTICE OF EXEMPTION

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

From: South San Francisco Unified School District
398 B Street
South San Francisco, CA 94080

San Mateo County Clerk
555 County Center
Redwood City, CA 94063

Project Title: Sunshine Gardens Elementary School Modernization

Project Location: 1200 Miller Avenue

Project Location: South San Francisco County: San Mateo

Description of Nature, Purpose, and beneficiaries of Project:

The project includes constructing a new exploratorium building and modernizing existing facilities, along with upgrading site infrastructure to enhance long-term functionality, safety, and accessibility of the Sunshine Gardens Elementary School.

Name of Public Agency Approving Project: South San Francisco Unified School District

Name of Person or Agency Carrying Out Project: South San Francisco Unified School District

Exempt Status:

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

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

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

☒ Categorical Exemption Section 15301 Class 1, *Existing Facilities*; Section 15302 Class 2, *Replacement or Reconstruction*, and Section 15314, Class 14, *Minor Additions to Schools*.

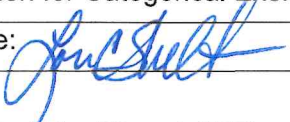
☐ Statutory Exemptions. State code number:

Lead Agency: South San Francisco Unified School District Area Code/Telephone: 650-877-8700

Contact Person: Lori Shelton, Director of Bond Program

Attachment:

Justification for Categorical Exemption

Signature:  Date: 2/3/2026 Title: BOND DIRECTOR

Date received for filing at OPR:

SUNSHINE GARDENS ELEMENTARY SCHOOL MODERNIZATION

SOUTH SAN FRANCISCO UNIFIED SCHOOL DISTRICT JUSTIFICATION FOR CATEGORICAL EXEMPTION

This section provides the justification for the determination that the proposed project is categorically exempt from the California Environmental Quality Act (CEQA).

I- Project Description

Site Location

The project site is located at 1200 Miller Avenue in South San Francisco, California (**Figure 1**). Sunshine Gardens Elementary School (SGES) is part of the South San Francisco Unified School District (SSFUSD or District). SGES serves children from transitional kindergarten (TK) through grade five. The school also provides a Pre-Kindergarten through Kindergarten (Pre-K-K) program onsite.

SSFUSD comprises nine elementary schools, three middle schools, two comprehensive high schools, and one continuation high school. In addition, Pre-Kindergarten program is provided at various District locations. Located in San Mateo County, the District spans portions of three cities: South San Francisco, Daly City, and San Bruno.

SGES is located within the Sunshine Gardens sub-area of South San Francisco. This neighborhood is generally located in the northwestern portion of the city, north of El Camino Real. It is mostly residential, consisting of a mix of middle-density and multi-family residential buildings.

The school is located on Miller Avenue, a local street that accommodates school-specific traffic. The neighborhood is served by several key local and regional roadways, including Mission Road and El Camino Real (State Route 82).

Existing Conditions

The 14-acre school campus consists of four long classroom wings that are oriented northwest to southeast (Buildings A, B, C, and D on **Figure 2**). Two other classroom buildings flank each side of Buildings C and D creating a central quad. A multi-purpose building, that includes the school cafeteria, is adjacent to Building A from the southeast (Building G on **Figure 2**). Portable classroom buildings are located at the northwest end of the main buildings (Buildings P29, P30, P31, and P32 on **Figure 2**), and playgrounds located on the east and west of the classroom buildings (**Figure 1**). A major portion of the project site to the northeast is an open space area. There is a parking lot near the southwest boundary of the campus adjacent to Miller Avenue. The paved playground area east of the classroom buildings has two solar exchange structures that shelter the student lunch area picnic tables.

Buildings A and B were constructed in 1954. Buildings C, D, E, F, and G were constructed in the 1960s. Few alterations appear to have been performed between the 1960s and 2025. Site elevations across the project site is approximately 130 feet.

Table 1, Sunshine Gardens Elementary School Campus Existing Facilities, provides a detailed list of the campus buildings and their corresponding square footage. The location of these buildings is depicted on the campus map on **Figure 2**. As indicated in Table 1, the total

square footage of the built area within the campus is approximately 43,604 square feet, with approximately 90 percent of this space designated for classrooms.

TABLE 1 SUNSHINE GARDENS ELEMENTARY SCHOOL CAMPUS - EXISTING FACILITIES

Building Name	Use	Year of Construction	Size (square feet)
Building A	Two classrooms, library, administration. Teacher lounge, workroom, offices, and storage	1954	7,475
Building B	Two day-care rooms, two preschool rooms, kitchen, office, and storage	1954	5,440
Building C	Four classrooms, art storage, and bathrooms	1960s	5,002
Building D	Five classrooms	1960s	4,972
Building E	Four classrooms, custodial facilities, and restrooms	1960s	5,073
Building F	Four classrooms, storage, electrical room, and restrooms	1960s	5,063
Building G	Multi-purpose, kitchen, office, storage, and stage	1960s	6,668
Portable Classroom (P29)	Student Support	1997	996
Portable Classroom (P30)	Classroom	1997	981
Portable Classroom (P31)	Daycare	1997	981
Portable Classroom (P32)	Preschool	1997	953
Total			43,604

SOURCE: SOHA Engineers, 2006; Noll & Tam, 2025;

Playgrounds and Outdoor Areas

The campus includes a playground on the western side featuring play structures serving preschool through 3rd-grade students. A separate play yard located on the east side accommodates 4th- and 5th-grade students. The remaining area along the east-southeast portion of the campus is fully paved and functions as a hardscape activity zone (See **Figure 1**).

Additional outdoor spaces include the central courtyard framed by Buildings C, D, E, and F; the esplanade located between Buildings A and D; a plaza south of Building F; two small yards west of Building E; and a designated welcome zone along the south façades of Buildings A and B (**Figure 1**).

The large open space area located on the north half of the school campus is separated in some locations from the built area by a chain link fence.

Access and Circulation

The campus is accessed from Miller Avenue via a one-way drop-off/pick-up lane that provides both entrance and exit (ingress/egress) and accommodates vehicle queuing. Two other closed gates are located at each end of the campus along Miller Avenue. Pedestrian access is provided through a gated pathway near the vehicular entrance.

Campus Vehicular Parking. Along with the short-term parking designated for student drop-off and pick-up, a dedicated parking area for staff and visitors is located to the east.

As shown in **Table 2 – Student Enrollment**, SGES had an approximate enrollment of 329 students for the 2024–25 school year. Districtwide, SSFUSD’s total enrollment for the same year is approximately 7,664 students. SSFUSD experienced an approximate 14.5 percent decline in enrollment between the 2014–15 and 2023–24 school years and is projected to continue experiencing a slight decline through 2029–30, reaching an estimated 7,478 students.¹ SGES is forecasted to enroll 345 students in 2029–30, resulting in an estimated enrollment of 345 students.² The net capacity of the school is 732 students.³

TABLE 2 - STUDENT ENROLLMENT

	2020-2021	2021-2022	2022-2023	2023-2024	2024-2025
Sunshine Gardens Elementary School ¹	328	325	334	334	329
South San Francisco Unified School District	8,182	7,933	7,868	7,770	7,664

SOURCES:

¹ Ed Data Education Data Partnership. 2025. School Summary. Sunshine Gardens Elementary School. https://www.ed-data.org/school/San-Mateo/South-San-Francisco-Unified/Sunshine-Gardens-Elementary?utm_source=chatgpt.com. Accessed December 1, 2025.

II- Proposed Project

The Sunshine Garden Elementary School Modernization Project (proposed project) includes the construction of a new exploratorium building and the modernization of existing campus facilities.

New Exploratorium Building

The proposed new exploratorium building would be located within the paved area southeast of building F (**Figure 2**). The exploratorium building would be one story and approximately 1,600 square feet. The exploratorium room, of approximately 1,458 square feet, would occupy the major portion of the new building. Other uses would include a meeting room, a staff restroom, and a storage room.

Proposed renovations to existing buildings

Structural and Safety Improvements

The project would implement a series of structural and life-safety upgrades to enhance the integrity and resilience of campus buildings. These improvements include seismic strengthening to meet current structural code requirements, installation of new exterior windows to improve natural light and energy performance, replacement of outdated door hardware, selective replacement of doors for security and accessibility compliance, and repair of exterior finishes to address damage, weathering, and deferred maintenance.

Interior Renovations

¹ School Works, Inc. 2023. South San Francisco Unified School District. 2023/2024 Demographics and Enrollment Projections. December.

² School Works, Inc. 2023. South San Francisco Unified School District. 2023/2024 Demographics and Enrollment Projections. December.

³ School Works, Inc. 2023. South San Francisco Unified School District. 2023/2024 Demographics and Enrollment Projections. December.

Interior areas in campus buildings would undergo modernization to improve functionality, appearance, and accessibility. Renovations include new flooring, ceiling repair, updated casework at sinks, interior painting, and other finish upgrades. Accessibility improvements would be implemented throughout interior circulation paths, including along designated paths of travel and within restrooms and sink areas, to ensure compliance with the California Building Code (CBC) and to provide equitable access for all users.

Building Systems Upgrades

The proposed project would provide modernization of building systems across campus buildings. The proposed improvements would include limited replacement of heating, ventilation, and air-conditioning (HVAC) equipment to increase energy efficiency and indoor air quality; upgrades to electrical and lighting systems to meet current performance and safety standards; improvement of telecommunications infrastructure; updates to plumbing systems to ensure reliability and adequacy for all buildings; and upgrades to fire alarm systems to ensure full code compliance.

Interim Classrooms

The proposed project would include the installation of four temporary interim classrooms northeast of Building F to accommodate instructional needs during construction. These interim classrooms would be removed upon completion of construction activities associated with the proposed project.

Pedestrians Pathways

The proposed project would upgrade all on-campus pedestrian pathways to comply with the accessibility requirements of the CBC. The enhanced pathways would establish continuous, accessible connections among all campus buildings and outdoor play areas.

The proposed project would rehabilitate concrete and asphalt pavement along designated pedestrian pathways throughout the campus. Repair activities would include removal of existing damaged pavement sections and installation of new pavement layers, including proper subgrade preparation and compaction to meet current engineering and safety standards.

Fire Protection Infrastructure

The proposed project would add two fire hydrants at the project site.

Utility Repair

The proposed project would implement targeted repairs to the campus storm drain and sanitary sewer pipeline networks at multiple locations. These improvements are intended to address identified deficiencies within the existing utility systems, including blockages caused by accumulated debris and sediment, root intrusions at pipe joints, circumferential fractures, and areas of pipe sag resulting in improper flow conveyance.

Playgrounds and Outdoor areas

The proposed project would enhance the campus's outdoor recreation areas through a series of landscape and play-environment improvements. In the northwestern playground and the eastern play yard, existing pavement would be repaired, and limited planting and trees would be provided. Additionally, a soccer field may be added on the southeastern side of the campus, as shown in **Figure 2**. As noted above, the large open space area located on the north half of the school campus is separated from the built area in some locations by a chain link fence and no improvements are proposed at this location under the proposed project.

Campus-wide landscape improvements include planting approximately 15 new trees, with species such as California buckeye, flowering dogwood, coast live oak, and bay laurel, to increase canopy coverage and strengthen ecological diversity. The project also proposes the creation of bioswale areas of approximately 625 square feet to enhance on-site stormwater management. The bioswale areas would be planted with brushes and grasses. The proposed project would also include limited habitat areas, incorporating native and pollinator-supportive species such as ceanothus, currant, poppy, and lupine.

Sustainable Measures

The proposed new building and campus improvements are being designed to comply with the Collaborative for High-Performance Schools (CHPS) Design Standards under the CHPS Designed™ recognition program. By adhering to these standards, the proposed project would incorporate design features to reduce environmental impacts, improve energy and water efficiency, enhance indoor environmental quality, and promote sustainable site development. Specific measures may include the use of energy-efficient heating, ventilation, and air-conditioning systems, low-flow plumbing fixtures, sustainable and durable building materials, enhanced daylighting and lighting controls, and stormwater management features such as bioswales.

In addition, the proposed new building and campus improvements would be designed in compliance with the California Green Building Standards Code (CALGreen).

III- Project Best Management Practices

The District will require the project contractor(s) to abide by the project permits requirements and the following project best management practices.

- A. **AIR QUALITY.** All project construction will comply with applicable local and State dust control regulations, as well as local health risk thresholds. The project will meet the **Bay Area Air District** (formerly Bay Area Air Quality Management District) thresholds for construction-related air pollutants.

To ensure compliance with air quality standards, the project will implement project-specific air quality control measures as needed. These may include, but are not limited to:

- Using high-tier engines on construction equipment.
- Employing Verified Diesel Emission Control Strategies (VDECS), such as diesel particulate filters, and low emissions fuel.

- B. **BIOLOGICAL RESOURCES.** Prior to the start of construction, a qualified biologist will conduct a preconstruction survey of the buildings and landscaped areas, to determine the presence of active bird nests. The survey will be conducted no more than 14 days prior to the initiation of construction activities. If active nests are identified, appropriate avoidance measures, including establishment of species-appropriate buffer zones, will be implemented and maintained until the nests are no longer active, as determined by the qualified biologist, in coordination with applicable regulatory requirements.

- C. **CULTURAL RESOURCES.**

1. **Alert Sheet:** Prior to any soils disturbing activities, the District shall distribute the "CULTURAL RESOURCES ALERT Sheet" to each project contractor or vendor involved in project-related soils disturbing activities; ensure that each contractor circulates it to all field personnel; and provide the District with a signed affidavit from each contractor confirming distribution to all field personnel.
2. **Discovery of Archaeological Resources.** The following measures shall be implemented in the event of a discovery during soil disturbance:
 - **Work Suspension.** Should a potential archaeological resource be encountered during project soils disturbing activity, with or without an archaeological monitor present, the project Head Foreman shall immediately suspend soils disturbing activities within 50 feet of the discovery, protect the find from further disturbance, and immediately notify the District Project Manager.
 - **Assessment:** A qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards (36-CFR 61), in consultation with the District, shall document the find, evaluate based on available information whether it qualifies as a significant historical resource under the CEQA criteria, and provide recommendations for additional treatment as warranted. The District will consult with the qualified archaeologist on these recommendations and may require implementation of additional measures, such as preparation and implementation of an Archaeological Monitoring Plan, a Subsurface Testing Plan, and/or an Archaeological Data Recovery Plan.
 - An **Archaeological Monitoring Plan (AMP)** shall be prepared and implemented within areas upon a discovery during construction. The AMP shall include the following elements:
 - Historical context and research design for assessment of resource types likely to be encountered;
 - Project activities to be archaeologically monitored and schedule of monitoring of each type and location of project construction activity; and
 - Procedures for the documentation, significance and integrity assessment, interpretation and reporting of the types of resources likely to be treatment, encountered.
 - **Monitoring Process.** The archaeological consultant will have the authority to halt construction activity at the location of a suspected resource for inspection, documentation, and assessment of the need for further measures, such as archaeological resources testing and recovery. The archaeological consultant shall record and collect soil samples, as warranted, for analysis. At the end of construction, whether or not significant archaeological resources are encountered, the archaeological consultant shall prepare a report of the findings of the monitoring
 - **Subsurface Testing Plans and Data Recovery.** If the District and archaeological consultant determine that the discovery is a significant resource that will be adversely affected, an archaeological field investigation will be conducted to determine whether the discovered resource retains depositional integrity and whether it qualifies as a legally significant resource under CEQA criteria.
 - **Subsurface Testing Plan.** If an archaeological investigation is required in order to verify resource location and/ or assess the significance of the resource, the

archaeological consultant shall prepare and implement a Subsurface Testing Plan (STP) that identifies:

1. Key research goals and associated data requirements,
2. Survey and testing/ sampling methods,
3. Laboratory and analytical methods, and
4. Reporting structure

- **Treatment.** If, based on the STP results, the District finds that significant archaeological resources may be present, preservation in place is the preferred manner of mitigating impacts, as detailed in CEQA Guidelines 15126.6(b) (3)(a) and (b).

If preservation in place is determined to be infeasible, the District at its discretion shall either:

1. Re-design the proposed project so as to reduce the adverse effect through preservation in place or other feasible measures; and/or
2. Document and/or recover the resource for interpretive use, at the discretion of the District, and/or;

For archaeological resources that would require recovery, the District shall prepare an archaeological data recovery program, that will identify how the archaeological resource will be recovered and preserved.

- **Archaeological Resources Reports.** If the discovered archaeological resource is treated during project implementation, the archaeological consultant shall submit an Archaeological Resources Report to the District that evaluates the historical significance of any discovered archaeological resource and describes the archaeological and historical research methods employed in the archaeological testing, monitoring, and data recovery program. Once approved by the District, copies of the Archaeological Resources Report shall be submitted to the California Historic Information System Information Center (CHRIS), one copy to each descendant group involved in the project (if applicable), and documentation to the District of transmittal of the above copies.
3. **Human Remains, Associated or Unassociated Funerary Objects.** The District shall ensure that human remains and associated or unassociated funerary objects discovered during any soils disturbing activity are treated in compliance with applicable State and federal laws. In the event of the discovery of potential human remains, the construction contractor shall ensure that construction activity within 50 feet of the find is halted and the District PM and the County Coroner are notified immediately. If the Coroner determines that the remains are of Native American origin, they will notify the California State Native American Heritage Commission. Subsequent consultation on and treatment of the remains will be conducted consistent with Public Resources Code Section 5097.98 and CEQA Guidelines Section 15064.5(d), in consultation with the District.
- D. **HAZARDOUS MATERIALS.** In the event that site soils or groundwater to be disturbed during construction are suspected or known to contain hazardous materials, including naturally occurring asbestos (NOA), the District shall perform an environmental assessment consistent with applicable regulatory standards (e.g., Phase I and Phase II assessments as warranted).

If the assessment identifies the presence of hazardous materials, the District shall prepare and implement a Hazardous Materials Management Plan or equivalent remediation plan to ensure that such materials are properly treated, contained, or removed in accordance with all applicable local, State, and federal regulations, including those enforced by the California Department of Toxic Substances Control, Regional Water Quality Control Board, San Mateo County Environmental Health Services Division, and Cal/OSHA. The plan shall include measures to prevent adverse exposure to workers, students, and the public during and after construction.

Should unidentified or unexpected hazardous materials (including stained soils, odors, or discolored groundwater) be encountered during construction, work in the immediate area shall be halted until a qualified environmental professional has evaluated the material, coordinated with the appropriate agencies, and ensured proper handling, removal, and disposal consistent with applicable laws and safety protocols.

The District shall also implement best management practices to prevent releases of hazardous materials used during construction activities, including proper storage in accordance with manufacturer recommendations, maintenance of spill containment and cleanup kits onsite, immediate containment of any spills to the extent safe and feasible, and collection and disposal of waste in compliance with applicable regulations.

All spills or releases of reportable quantities shall be promptly reported to the appropriate agencies, including the San Mateo County Environmental Health Services Division, California Office of Emergency Services, Department of Toxic Substances, Regional Water Quality Control Board, and Bay Area Air District, as applicable.

- E. **NOISE.** The project will comply with local noise ordinances regulating construction noise. The District shall undertake measures to minimize noise disruption to nearby neighbors and sensitive receptors during construction. These efforts could include using best available noise control technologies on equipment (i.e., mufflers, ducts, and acoustically attenuating shields), locating stationary noise sources (i.e., pumps and generators) away from sensitive receptors, erecting temporary noise barriers, and other such measures.
- F. **GEOLOGY AND SOILS.** The project will prepare a characterization of soil types and evaluate the potential for liquefaction, subsidence, landslide, fault displacement, and other geological hazards at the project site. The project will be engineered and designed as necessary to minimize risks to safety and reliability arising from these hazards.
- G. **HYDROLOGY AND WATER QUALITY.** The project will implement site-specific erosion and sedimentation controls—such as fiber rolls, gravel bags around stormwater inlets, silt fences, and other appropriate measures—to prevent the discharge of sediment and other pollutants to storm drains and surface waters. Any uncontaminated groundwater encountered during excavation activities will be discharged in compliance with applicable water quality standards and permit requirements.
- H. **TRANSPORTATION.** The project will implement traffic control measures designed to maintain safe and efficient circulation for vehicles and pedestrians on public streets affected by construction. Such measures may include, but are not limited to, flaggers and construction warning signage, scheduling truck trips during non-peak hours where feasible, maintaining access to driveways, private roads, and off-street commercial loading areas using steel trench plates or similar methods, and coordinating with local emergency responders to ensure uninterrupted emergency access. The project will also obtain all required encroachment permits from the relevant jurisdiction for work within public roadways.

IV- Reasons to Support Exemption Findings

CEQA provides several “categorical exemptions” which are applicable to categories of projects and activities that the lead agency has determined generally do not pose a risk of significant impacts on the environment. The District has determined that the proposed project is exempt under CEQA Guidelines Section 15301 – *Existing Facilities*, Section 15302 – *Replacement or Reconstruction*, and Section 15314 – *Minor Additions to Schools*.

Class 1 Exemption applies to the “operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment or topographical features, involving negligible or no expansion of existing or former use.” The key consideration is whether the project involves negligible or no expansion of use. Example of projects that would qualify under Class 1 Exemption include “(a) Interior or exterior alterations involving such things as interior partitions, plumbing, or electrical conveyances” and “(d) Repairs or maintenance of existing structures or facilities (e.g., repairing a damaged building or infrastructure) where the use doesn’t expand.”

Class 2 Exemption applies to the replacement or reconstruction of existing utility systems involving negligible or no expansion of capacity, located on the same site as the structure replaced, and possess substantially the same purpose and capacity as the structure replaced, including but not limited to “(a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.”

Class 14 Exemption applies to the construction of new structures or minor additions at existing school sites, provided that the additions do not increase original student capacity by more than 25 percent or ten classrooms, whichever is less. The addition of temporary interim classrooms is included in this exemption.

The proposed project is exempt per CEQA Guidelines section 15301 Class 1, section 15302 Class 2, and section 15314 Class 14 for the following reasons:

- The proposed project would be fully located within the SGES.
- The proposed project would not result in a change of use of the campus or any of its facilities and would not expand the capacity of the school.
- The proposed project would improve overall campus conditions, constructing an exploratorium and modernizing some existing buildings to be seismically compliant and meet California Green Building Standards (Title 24), without increasing capacity or generating new environmental impacts.
- The project site is not within an environmental sensitive environment.
- The proposed project would improve the existing classrooms and add an exploratorium room of approximately of 1,458 square feet as part of the new 1,600-square-foot building. The exploratorium room is intended for use by all classes for specific experimental and laboratory. Therefore, it would not add more classrooms. In addition, of the approximately 39,000 square feet classroom space on campus (90 percent of the existing buildings space), the exploratorium room represents approximately a 4 percent increase in the total square footage of classrooms on campus, which is below the 25 percent or 10-classroom threshold identified under the Class 14 (Minor Additions to Schools) categorical exemption.

V- Exceptions to Categorical Exemptions

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

A. Cumulative Impact

Exemptions are not applicable when there is a significant cumulative impact of “successive projects of the same type in the same place over time.” There are no known or anticipated projects planned for development on campus or within the immediate vicinity of the project site during the same timeframe as the proposed project. As such, there is no evidence of a potential for cumulative impacts resulting from this project in combination with other foreseeable projects. Therefore, the proposed project would not result in cumulative impacts.

B. Significant Effects

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

No drainages, streams, wetlands, or other jurisdictional features occur onsite. As a result, there are no waters of the United States or waters of the State within the campus boundary. No native or sensitive plant communities are present at the project site. The site also does not provide habitat for special-status plant or wildlife species. Although several federally listed butterfly species, such as the Bay checkerspot butterfly, callippe silverspot butterfly, Mission blue butterfly, and San Bruno elfin butterfly, have been recorded within approximately 3 miles of the site, these occurrences are associated with San Bruno Mountain, located roughly 0.3 mile to the north and separated from the school by dense urban development. No host plants for these butterfly species were observed within or adjacent to the onsite areas proposed for disturbance.

With regard to other federally listed or candidate species known from the region, such as the California red-legged frog, California Ridgway's rail, and San Francisco gartersnake, the project site does not contain suitable habitat. The site is highly urbanized and does not have marshes, ponds, streams, or wetlands; existing development and major roadways create effective barriers to the movement of these terrestrial species. The project site is also not located within any federally designated critical habitat.

Although, the campus is fully developed, and all grading and ground-disturbing activities would occur within previously disturbed areas, nesting birds protected under the Migratory Bird Treaty Act may utilize existing buildings or ornamental landscaping within the construction areas. As indicated in Section III, Project Best Management Practices, above, implementation of the proposed project would be in compliance with all applicable environmental laws and regulations and would include pre-construction surveys of buildings and work areas to identify and avoid potential impacts on nesting birds, thereby ensuring that biological resources are adequately protected during construction.

There are no unusual circumstances associated with the site that would increase the likelihood of significant environmental effects, and no evidence indicates that the proposed project would cause significant direct or indirect impacts. Because the project would occur in previously disturbed areas and includes best management practices that avoid or minimize potential biological impacts, the unusual circumstances exception does not apply.

C. Scenic Highways

A categorical exemption cannot be used for a project which may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a state scenic highway (CEQA Guidelines section 15300.2(c)). The project site is not located within the viewshed of a state-designated scenic highway. The California Department of Transportation (Caltrans) officially designates the segment of Interstate 280 (I-280) from the Santa Clara County line to the northern city limits of San Bruno as a State Scenic Highway. The remaining northern I-280 segment is designated as eligible State Scenic Highway. SGES is located approximately 2 miles north of the officially designated I-280 segment and approximately 1.4 miles northeast of the eligible I-280 segment.⁴ The school is separated from the highway by intervening topography and vegetation, which likely obscures direct views of the campus from the highway. Therefore, the exception to the categorical exemption for projects affecting scenic highways under CEQA Guidelines Section 15300.2(c) does not apply to this project.

D. Hazardous Waste Sites

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

A review of State Water Resources Control Board (SWRCB) GeoTracker⁵ and State Department of Toxic Substances (DTSC) Envirostor⁶ databases confirmed that there are no "Open" hazardous materials sites at the project site or its vicinity. Therefore, the project site is not listed as a hazardous waste site, and the hazardous waste site exception to the use of a categorical exemption does not apply.

As indicated in Section III, Project Best Management Practices, the proposed project would include implementation of best management practices during project construction to prevent the release of hazardous materials at the site. These measures would include storing these materials pursuant to manufacturer recommendation, maintaining spill kits onsite, and containing any spills that occur to the extent safe and feasible followed by collection and disposal in accordance with applicable laws. With implementation of the project's best

⁴ California Department of Transportation. State Scenic Highway.
<https://experience.arcgis.com/experience/47e2009986264718a5a13a2c81382774>. Accessed July 3, 2025.

⁵ SWRCB. GeoTracker.
<https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=sunshine+gardens+elementary+school>. Accessed on July 3, 2025.

⁶ DTSC. Envirostor.
<https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=sunshine+gardens+elementary+school>. Accessed on July 3, 2025.

management practices, adverse effects related to potential exposure of construction workers or the public to hazardous materials are not anticipated.

E. Historical Resources

An exemption cannot be used for a project which may cause a substantial adverse change in the significance of a historical resource. Under the CEQA guidelines, historical resources include buildings, structures, sites, objects, or districts that are listed in, eligible for listing in, or determined eligible for the California Register of Historical Resources; listed in a local register of historical resources; or determined by the lead agency to be historically significant based on substantial evidence, consistent with the California Register criteria.

Based on a preliminary historical resource assessment prepared for SGES,⁷ the campus has been determined ineligible for historical listing and does not qualify as a historical resource under CEQA. The assessment notes that the classroom buildings constructed during the 1950s and 1960s exhibit characteristics of Modernist educational architecture; however, the campus represents a relatively typical example of Midcentury Modern school design and lacks the architectural distinction associated with more significant educational facilities of the era. Cost-efficiency appears to have been the primary design consideration, resulting in buildings that do not embody innovative design trends or high artistic values.

The assessment further concludes that alterations over time, such as the replacement of original windows and other modifications, have diminished the integrity of the buildings' original design, workmanship, and materials. The school's primary designer, Roy G. Watanabe, was a Bay Area architect responsible for several institutional and commercial buildings in San Francisco and the surrounding region. Because his career was disrupted by wartime restrictions and ended prematurely due to his early death, he did not develop a body of work that garnered broad professional recognition or exerted notable influence on architectural practice at the state or national level.

Additionally, no evidence was identified to suggest that the campus is associated with historically significant events or persons. For these reasons, SGES does not appear eligible for listing in the California Register of Historical Resources or the National Register of Historic Places and therefore does not meet the definition of a historical resource under CEQA. Therefore, the exception to the categorical exemption for projects affecting historical resources under CEQA Guidelines Section 15300.2(d) does not apply to the proposed project.

VI- Conclusion

Based on the above discussion, the proposed project is exempt per CEQA Guidelines Section 15301 Class 1, Section 15302 Class 2, and Section 15314 Class 14.

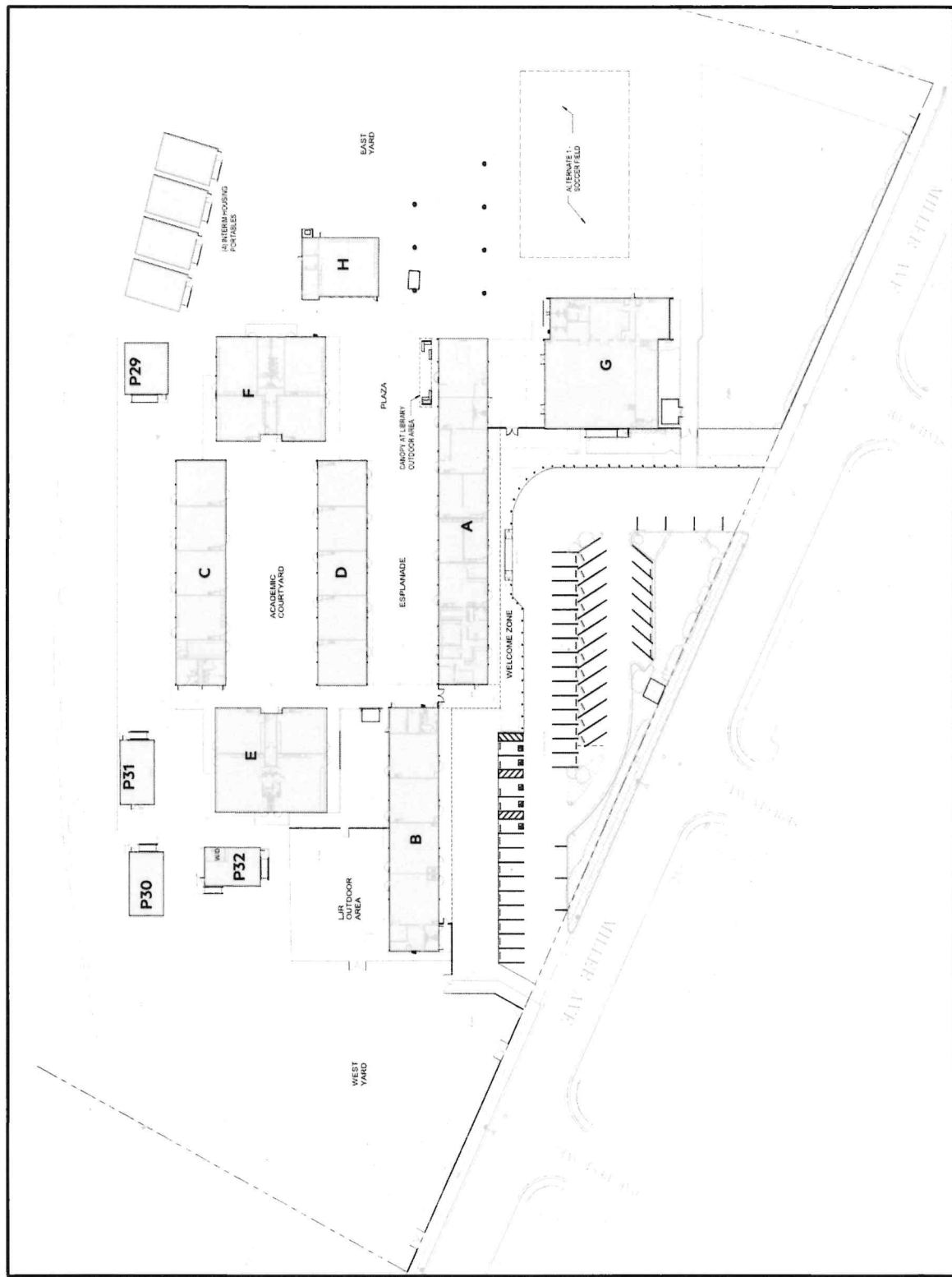
⁷ Brunzell Historical. 2025. Preliminary Historic Resources Assessment for the Sunshine Gardens Elementary School at 1200 Miller Avenue, South San Francisco, San Mateo County, California. August 7.

FIGURES



Source: Google, 2025

FIGURE 1
Project Location
Sunshine Gardens Elementary School Modernization Project



Source: Noll & Tam, 2025.