

**1457 El Camino Real Project
Class 32 CEQA Exemption
City of Burlingame, San Mateo County, California**

Prepared for:
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Report Date: January 23, 2020

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ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ARB	California Air Resources Board
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMP	Best Management Practice
C/CAG	City/County Association of Governments
CalEEMod	California Emissions Estimator Model
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CCFD	Central County Fire Department
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
COA	Condition of Approval
CPTED	Crime Prevention through Environmental Design
CRHR	California Register of Historical Resources
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DTSC	Department of Toxic Substances Control
DU	dwelling units
DU/acre	dwelling units per acre
EPA	United States Environmental Protection Agency
FTA	Federal Transit Administration
GHG	greenhouse gas
gpd	gallon per day
Hexagon	Hexagon Transportation Consultants, Inc.
HVAC	heating, ventilation, and air conditioning
in/sec	inch per second

Acronyms and Abbreviations

ITE	Institute of Transportation Engineers
lb	pound
L _{dn}	day-night average sound level
L _{eq}	equivalent sound level
LID	Low Impact Development
mcy	million cubic yards
mgd	million gallons per day
MRP	Municipal Regional Permit
MS4	Municipal Separate Storm Sewer System
MT	metric ton
NAHC	Native American Heritage Commission
NO ₂	nitrogen dioxide
NO _x	oxides of nitrogen
NPDES	National Pollution Discharge Elimination System
NWIC	Northwest Information Center
PM	particulate matter
PM ₁₀	particulate matter, including dust, 10 micrometers or less in diameter
PM _{2.5}	particulate matter, including dust, 2.5 micrometers or less in diameter
Ppm	parts per million
PPV	peak particle velocity
ROG	reactive organic gas
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo County Transit District
SB	Senate Bill
SCS	Sustainable Communities Strategy
SFPUC	San Francisco Public Utilities Commission
SLCP	short-lived climate pollutant
TAC	toxic air contaminant
UWMP	Urban Water Management Plan
VOC	volatile organic compounds
WWTF	Wastewater Treatment Facility
ZEV	zero-emission vehicle

SECTION 1: PROJECT DESCRIPTION

Project Title:	1457 El Camino Real Project
Lead Agency Name and Address:	City of Burlingame 501 Primrose Road Burlingame, CA 90410
Contact Person and Phone Number:	Amelia Kolokihakaufisi, Associate Planner 650.558.7216
Project Location:	1457 El Camino Real Burlingame, CA 94010
Project Sponsor's Name and Address:	Rabih Balout 3000 Hillside Drive Burlingame, CA 94010
Existing General Plan Designation:	Medium-High Density Residential
Existing Zoning:	R-3: Multi-family Residential

1.1 - Existing Setting and Neighboring Land Uses

The 1457 El Camino Real Project (proposed project) site is an approximately 8,160-square-foot (0.19-acre) parcel, located in the City of Burlingame, in San Mateo County, California. Exhibit 1 shows the project site in relation to the Bay Area region, including surrounding communities and other major geographic features.

The project site is located on the southwest side of State Route 82 (SR-82)/El Camino Real, approximately 0.5-mile southwest of U.S. Highway 101. On a regional basis, the project site is approximately 1.06 miles southeast of the Millbrae Bay Area Rapid Transit (BART) Station, 1.7 miles northwest of the Burlingame Caltrain Station, and approximately 1.59 miles northwest of the City of Burlingame downtown area.

The project site is surrounded by El Camino Real to the north; medium/high density residential use and El Camino Real to the east; medium density residential use to the west; and low density residential to the south. The topography of the site is generally flat. The right-of-way along El Camino Real contains *The Howard Ralston Eucalyptus Tree Row*. The Tree Row is listed in the National Register as a Historical Resource. Exhibit 2 shows the project site in relation to its immediate surroundings.

The project site is designated “medium/high density residential” and zoned “R-3” (multi-family residential use). This zone is different from R-4 zones (also multi-family residential use), which also allows for churches, convents, and parish houses.¹ The site is currently developed with a single-story,

¹ City of Burlingame. Burlingame Municipal Code Title 25 Zoning.

approximately 1,700-square-foot duplex, and an approximately 700-square-foot, two-story home, built in the 1940s. There is also a brick patio and wooden deck in the south corner adjacent to the house. One point of vehicular ingress/egress to El Camino Real provides access to the site. Exhibit 3 shows the project site's existing condition.

1.2 - Proposed Project

The proposed project would result in the demolition of the existing residential buildings and subsequent construction of nine market-rate condominium units (Exhibit 4). The complex would be 4-stories tall, at 47 feet.

The project would maintain the existing access point and add a second access point using the driveway of the adjacent building to the southeast. Both access points are on El Camino Real along the northeast project site boundary. The northern driveway would lead to an underground garage with a drive aisle leading to 12 parking spaces for residents. The southern driveway would provide access to eight at-grade parking spaces for residents, guests, and service/delivery vehicles. Every unit would receive ownership of at least one parking space. The 20 parking spaces would include one accessible space (in conformance with the Americans with Disabilities Act (ADA), one guest and one accessible guest space, and one service/delivery space, meeting Municipal Code § 26.30.070, which requires two guest spaces and a delivery area.² A warning device shall be placed to warn pedestrians of oncoming vehicles exiting both the northern and southern driveways.

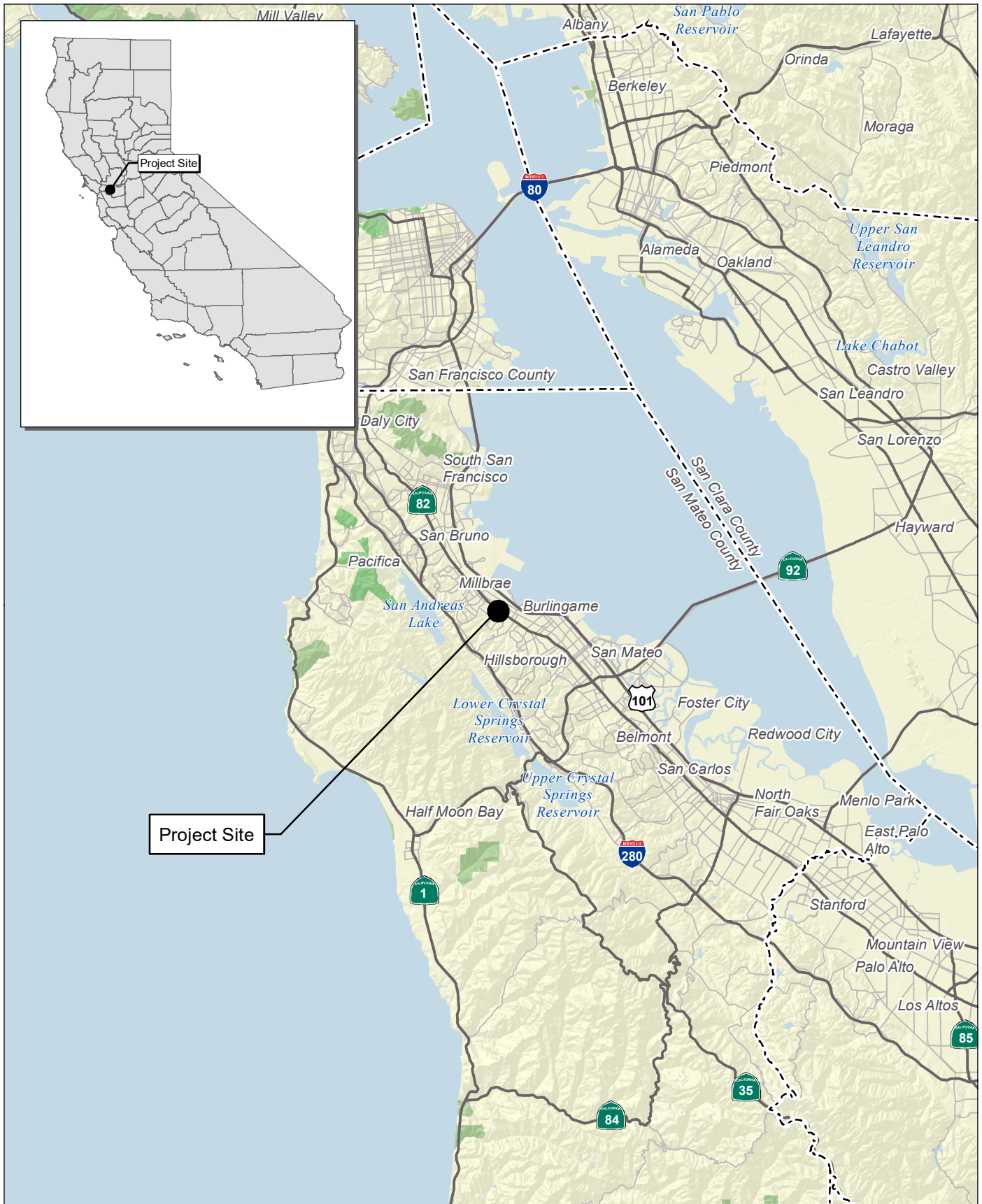
A sidewalk along the project's El Camino Real frontage would be maintained or replaced at the same dimensions. The project site would feature a 905-square-foot common open space area for project residents' use. The site would provide a total of 2,919 square feet of open space, including the common open space area, private patios, and roof terraces. The provided open space exceeds the City's required 100 square feet of common open space per unit, and 75 square feet of private open space per unit, or a total of 1,575 square feet for nine units.³ Landscaping would be provided within the front setback and rear common open space area.

Existing wet utilities (e.g., sewer, water, stormwater) adjacent to the project site would be used for proposed new connections. A new joint trench for gas, electric, and telephone lines is proposed along the southwest project boundary, leading into the project site. The off-site improvements necessary to serve the proposed project would be limited to trenching within the unnamed alley to the rear of the project site parallel to El Camino Real and widening of the existing curb cut into the California Department of Transportation (Caltrans) right-of-way in El Camino Real.

Exhibit 4 shows the plans for the proposed project. As illustrated, the proposed project would include landscaping in the front setback and rear common open space area, including the planting of five trees, 49 shrubs, and 17 succulents. Two tree species would be planted: Swan Hill olive tree (*Olea europaea* "swan hill") and white-barked Himalayan birch (*Betula utilis* var. *jacquemontii* multi-stem). Landscaping between the two driveways shall be kept below 3 feet to allow drivers to see pedestrians on sidewalks.

² City of Burlingame. Burlingame Municipal Code Section 26.30.070 Minimum project requirements.

³ Ibid.



Source: Census 2000 Data, The CaSIL.

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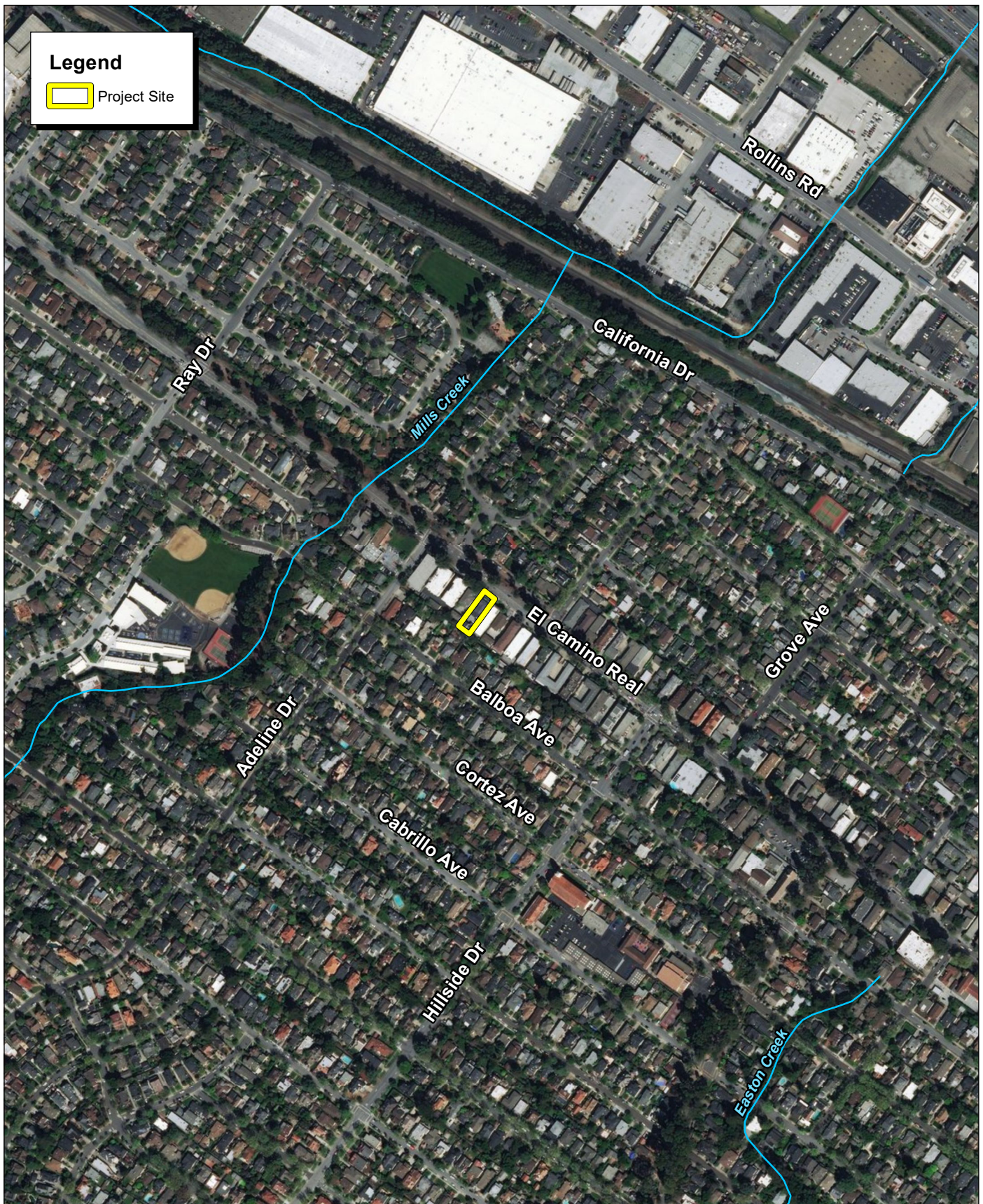


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Miles

Exhibit 1

Regional Location Map

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Source: ESRI Aerial Imagery.

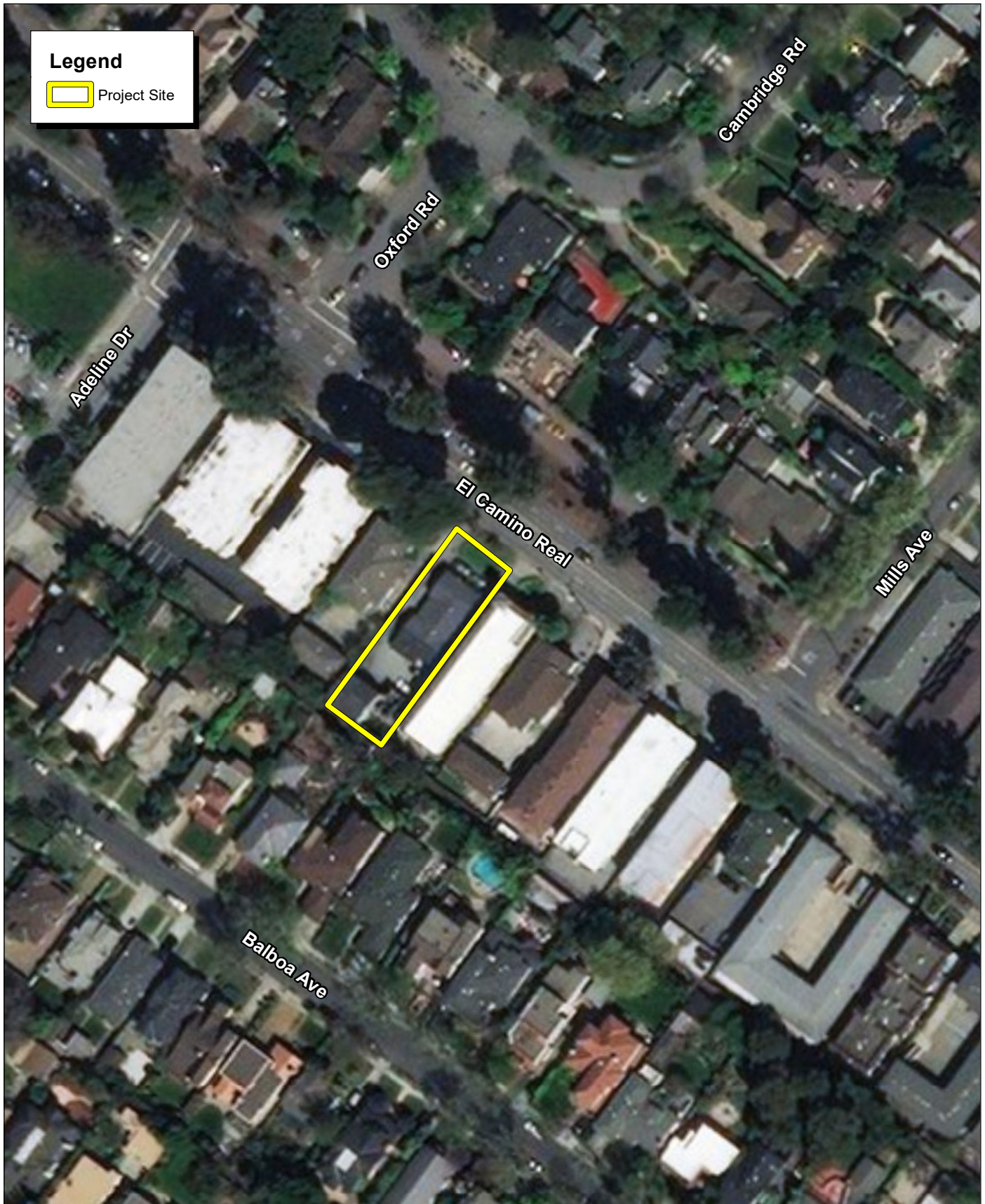
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Feet

Exhibit 2 Local Vicinity Map Aerial Base

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Source: ESRI Aerial Imagery.

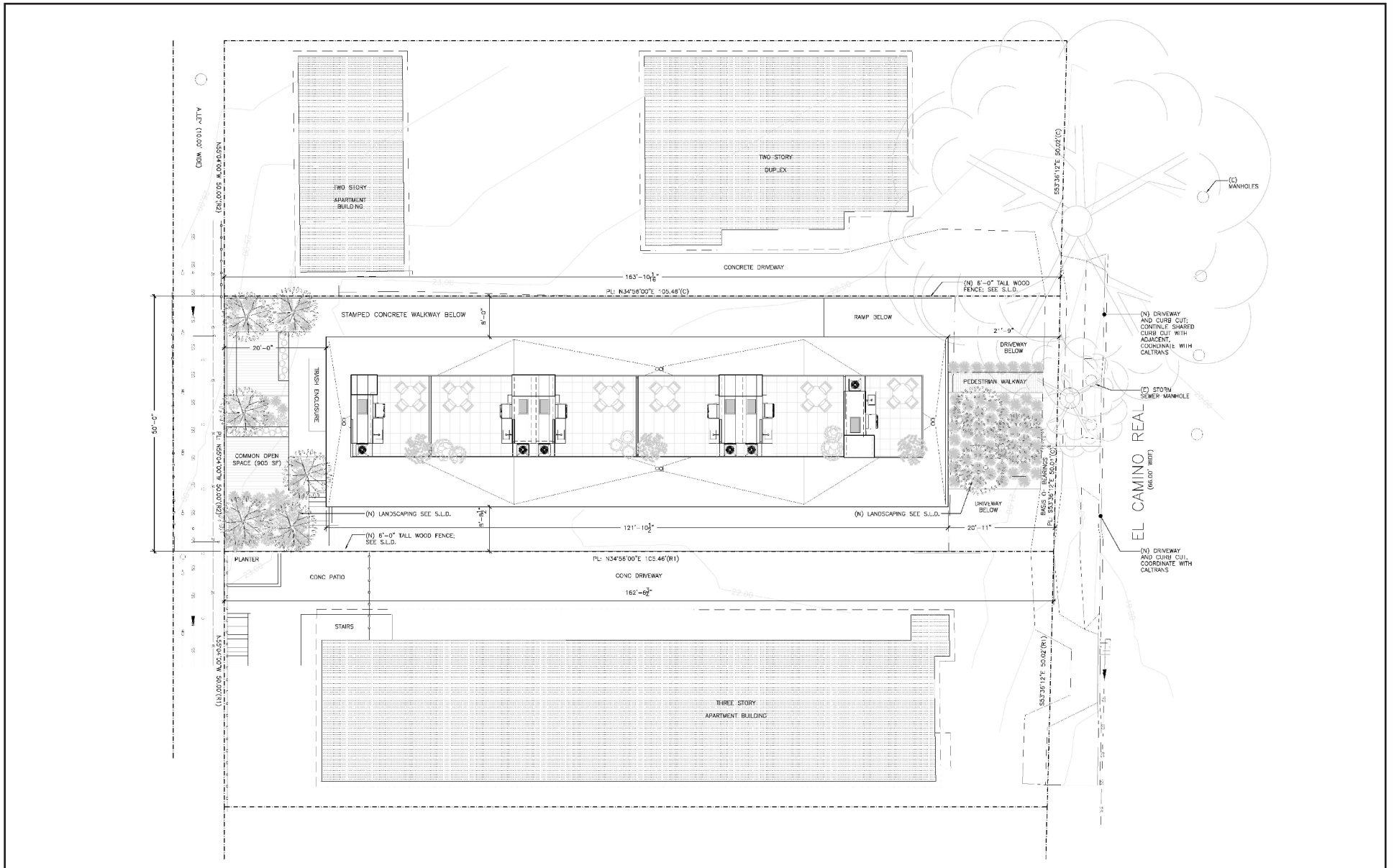
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Exhibit 3 Existing Conditions

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Source: Troy Kashanipour Architecture, May 24, 2019.

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1.2.1 - Construction

The proposed project's construction activities would span an estimated 13 months and would occur in six phases. Construction would be restricted to weekdays between 8:00 a.m. and 7:00 p.m., and Saturdays between 9:00 a.m. and 6:00 p.m. No construction is allowed on Sundays or holidays.

Demolition of the existing structures is estimated to take approximately two weeks of the 13-month schedule. Tree and vegetation removal would occur outside the typical avian nesting season (March through early September). Subsequent grading activities would include approximately 1,420 cubic yards of export that would occur over approximately four months. Dewatering will likely be necessary during construction because of groundwater levels. Construction equipment (e.g., scrapers, loaders, dump trucks) would include use of rubber tires. No fixed crane or tracked equipment is anticipated. As part of the Project, the applicant has specified that Project construction methods will not include the use of impact, sonic, or vibratory pile driving methods. In addition, foundation compaction techniques will exclude the use of vibratory rollers on the project site and will exclude the use of all vibration-compaction equipment within 25-feet of the project boundaries. Alternate methods of compaction to be used will include the use of back-hoe mounted, non-vibratory, sheepsfoot rollers, or the use of hand-controlled jump-jack compactors, or similar low- or non-vibratory compaction equipment. As part of the Project approval, the applicant will provide a Construction Vibration Management Plan which will include a list of all heavy construction equipment to be used on the project site that are known to produce high vibration levels (tracked vehicles, vibratory compaction, jackhammers, hoe rams, etc.) to the Community Development Director or the Director's designee. This list shall be used to identify equipment and activities that would potentially generate substantial vibration and to define the level of effort required for continuous vibration monitoring to ensure the project would not exceed acceptable thresholds.

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SECTION 2: CATEGORICAL EXEMPTION

Article 19 of the California Environmental Quality Act (CEQA) Guidelines includes, as required by Public Resources Code Section 21084, a list of classes of projects that have been determined not to have a significant effect on the environment and, as a result, are exempt from review (i.e., do not require the preparation of a Negative Declaration/Mitigation Declaration or Environmental Impact Report [EIR]) under CEQA. The following discusses the exemption class applicable to the project.

2.1 - Class 32 (In-Fill Development Projects)

CEQA Guidelines Section 15332 is applicable to projects characterized as in-fill development meeting the following conditions:

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
- (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
- (c) The project site has no value as habitat for endangered, rare or threatened species.
- (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
- (e) The site can be adequately served by all required utilities and public services.

The analysis below provides substantial evidence that the proposed project properly qualifies for an exemption under CEQA Guidelines Section 15332 (i.e., Class 32) and, as a result, would not have a significant effect on the environment. Additionally, the analysis shows there are no exceptions to qualifying for the categorical exemption that would apply to the project as identified at CEQA Guidelines Section 15300.2.

(a) Criterion Section 15332(a): General Plan and Zoning Consistency

The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.

The project site is designated Medium-High Density Residential by the City of Burlingame General Plan,⁴ which allows for 21 to 50 dwelling units per acre (DU/acre). The project site is 0.19 acres in size, and the proposed nine units therefore represent a density of approximately 47 units per acre, which is consistent with the General Plan designation. The City of Burlingame Zoning Ordinance designates the project site as R-3, or multi-family residential use.^{5,6} As a condominium project, the proposed project is consistent with the zoning designation. Therefore, the proposed project adheres to the criteria of CEQA Guidelines Section 15332(a).

⁴ City of Burlingame. 2000. General Plan Land Use Map. April.

⁵ City of Burlingame. 2016. Draft Citywide Zoning Map. June.

⁶ City of Burlingame. Burlingame Municipal Code Section 25.28.020, Permitted Uses.

(b) Criterion Section 15332(b): Project Location, Size, and Context

The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The project site is located at 1457 El Camino Real, within the City of Burlingame. The project site is approximately 0.19-acre (8,160 square feet). Surrounding the site are other developed urban residential properties and a paved public street (El Camino Real) (see Exhibit 3). Therefore, the proposed project adheres to the criteria of CEQA Guidelines Section 15332(b).

(c) Criterion Section 15332(c): Endangered, Rare, or Threatened Species

The project site has no value as habitat for endangered, rare or threatened species.

As shown in Exhibit 3 the proposed project site consists of minimal landscaping, a deck and patio, two residential buildings, and a paved driveway. Because of the site condition, the habitat suitability for rare or native vegetation in these areas is very low, and the project site is under an altered hydrologic regime, being either covered by hardscape or irrigated to support landscaping. Developed habitats primarily support common, urban-adapted wildlife species, though overall wildlife abundance and diversity are low. Likewise, most wildlife species use landscaped habitats only sparingly, largely because of the uniform, open nature of most landscaping and the regular disturbance that occurs due to landscape maintenance and use. Consequently, the project site does not include habitat for endangered, rare, or threatened species.

The project site includes trees that would be removed. There are three trees (one dead eucalyptus, one live eucalyptus, and a young elm), all on the Caltrans right-of-way at the project frontage. The elm is a contributing element of the *Howard Ralston Eucalyptus Tree Row* and would either remain on-site or be replaced by another Accolade elm (*Ulmus 'Accolade'*) or Patriot elm (*Ulmus 'Patriot'*). The eucalyptuses do not require replacement trees and are recommended for removal by Caltrans. Burlingame Municipal Code Section 11.06.090 requires one tree planting for every 2,000 square feet of lot coverage for condominiums.⁷ The proposed project includes the planting of approximately five trees on-site, thereby meeting City requirements.

Proposed landscape trees exceed the number of existing trees and would only increase potential habitat for bird species. Therefore, the proposed project adheres to the criteria of CEQA Guidelines Section 15332(c).

(d) Criterion Section 15332(d): Traffic, Noise, Air Quality, or Water Quality

Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.

Relative to CEQA Guidelines Section 15332(d), the following pages of this technical report provide substantial evidence that the proposed project, compared with the applicable thresholds of significance, will not result in a significant effect on the topics of traffic, noise, air quality, or water quality. Therefore, the proposed project meets the criteria of CEQA Guidelines Section 15332(d).

⁷ City of Burlingame. Burlingame Municipal Code Section 11.06.090, Tree Requirements and Reforestation.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation	Less than Significant Impact	No Impact
Transportation <i>Would the project:</i>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially increase hazards due to a geometric 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"/>

Introduction

The analysis and conclusions described under this environmental topic are derived from the project-specific Trip Generation Analysis and Site Review Memorandum prepared by Hexagon Transportation Consultants, Inc. (Hexagon) dated July 17, 2019 (see Appendix A).

Would the project:

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

Less than significant impact. The Trip Generation Analysis included in Appendix A analyzes the potential impacts of the proposed project on traffic operations under existing traffic conditions. As set forth more fully below and in Appendix A, the project would not result in any significant impacts.

Trip Generation

The anticipated trip generation for the proposed project was estimated using standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 10th Edition, 2017 for Multi-family Housing (Mid-Rise) (Land Use 221). Multi-family Housing (Mid-Rise) is defined as apartments, townhouses, or condominiums that have between three and 10 levels. The proposed project would be four stories in height.

Hexagon compared the trips generated by the existing single-family house and duplex apartment to the trips that would be generated by the proposed residential use. The trips generated by the existing single family home were estimated using standard rates published by the Institute of Transportation Engineers (ITE) in Trip Generation Manual, 10th Edition, 2017 for Single-family Detached Housing (Land Use 210), while the trips generated by the existing duplex were estimated

based on ITE Multi-family Housing (Low-Rise) (Land Use 220). Multi-family Housing (Low-Rise) is defined as apartments, townhouses, or condominiums that have one or two levels (floors).

As shown in Table 1, the proposed project is estimated to generate 25 new daily trips, including one during the AM peak-hour and two during the PM peak-hour. This would be an insignificant impact to existing traffic volumes.

Table 1: Project Trip Generation Estimates

Land Use	Size	Unit	Daily		AM Peak-hour				PM Peak-hour			
			Rate	Trips	Rate	In	Out	Total	Rate	In	Out	Total
Proposed Uses												
Multi-family Housing ¹	9	DU	5.44	49	0.36	1	2	3	0.44	2	2	4
Existing Use												
Single-family Home ²	1.0	DU	9.44	(9)	0.74	0	(1)	(1)	0.99	(1)	0	(1)
Duplex Apartments ³	2.0	DU	7.32	(15)	0.46	0	(1)	(1)	0.56	(1)	0	(1)
Total Existing Trips				(24)	—	0	(2)	(2)	—	(2)	0	(2)
Net Project Trips				25		1	0	1		0	2	2
Notes: DU = Dwelling Unit Trip rates for multi-family and single-family detached housing uses are from the ITE Trip Generation Manual, 10 th Edition, 2017. ¹ Multi-family Housing (Mid-Rise) (Land Use 221), average rates expressed in trips per DU are used. ² Single-family Detached Housing (Land Use 210), average rates expressed in trips per DU are used. ³ Multi-family Housing (Low-Rise) (Land Use 220), average rates expressed in trips per DU are used. Source: Hexagon Transportation Consultants, Inc. 2019												

Project Driveways and El Camino Real

The two driveways would allow both right and left turns on and off El Camino Real. To determine whether there would be sufficient gaps in traffic to allow these movements, Hexagon counted traffic on El Camino Real on July 10, 2019. The time between vehicle arrivals was compared to the critical gap and follow-up times to determine the number of vehicles that could successfully complete the inbound left turn, outbound left-turn, and outbound right turn movements during the AM and PM peak-hours. Based on the observed arrival times of the traffic along El Camino Real, there are sufficient gaps to accommodate up to 256 and 236 outbound left turns during the AM and PM peak-hours, respectively. Additionally, there are sufficient gaps to accommodate up to 186 and 127 outbound left turns during the AM and PM peak-hours, respectively. Finally, there are sufficient gaps to accommodate up to 218 and 183 outbound right turns during the AM and PM peak-hours, respectively. Table 2 shows the number of gaps available for the analyzed turning movements.

Table 2: Gap Data

Peak-hours	Gaps for Inbound LT from El Camino Real	Gaps for Outbound LT from Project Driveway	Gaps for Outbound RT from Project Driveway
AM Peak-hour	256	186	218
PM Peak-hour	236	127	183
Notes: LT = Left Turn; RT = Right Turn Source: Hexagon Transportation Consultants, Inc. 2019			

The average delay for the outbound left-turn and right-turn movements was analyzed based on the estimated outbound volume (two vehicles in the AM and PM peak-hours) and the observed movement capacity. The inbound left-turn movement was also analyzed (one vehicle in the AM peak-hour and two vehicles in the PM peak-hour). Based on the low amount of traffic coming in and out of the project site and the number of sufficient gaps for the left and right turns, it is expected that there would be a low average delay for vehicles entering and exiting the driveway onto El Camino Real, and therefore a less than significant impact.

Both the City of Burlingame General Plan and the San Mateo County Comprehensive Bicycle and Pedestrian Plan provide adopted policies, plans, and programs for bicycle and pedestrian facilities. While the El Camino Real public right-of-way abutting the project site is in a Pedestrian Focus Area, neither plan assigns designations (such as proposed trail or bicycle lane) for the roadway.⁸ The proposed project would maintain the existing roadway width and sidewalks, and the site's existing accessibility and proximity to nearby transit options, including the San Mateo County Transit District (SamTrans) bus service, Millbrae BART Station, and Burlingame Caltrain Station. As such, the proposed project would not conflict with, or otherwise decrease the performance of any adopted policy, plan, or program related to bicycle and pedestrian facilities.

A SamTrans bus stop is located approximately 350 feet (0.07 mile) northwest of the project site at the intersection of El Camino Real and Adeline Drive. SamTrans Routes 397 and ECR serve the stop at approximately 1-hour and 15-minute intervals, respectively.^{9,10} Both routes connect to the Millbrae Transit Center, San Francisco International Airport, and Caltrain stations from at least Hillsdale to Redwood City. According to the U.S. Census Bureau's 2018 American Community Survey, approximately four percent of employed persons in San Mateo County use public transportation to commute to work. The average household size for the City of Burlingame is 2.4 persons.^{11,12} Conservatively assuming that all household members would be employed, the nine units would result in approximately 22 residents and one new transit trips (four percent of 22 persons).¹³ One transit trip would not impact existing service levels. The proximity of the project site to the bus stop,

⁸ Alta Planning + Design. 2011. San Mateo County Comprehensive Bicycle and Pedestrian Plan. September 8.

⁹ San Mateo County Transit District. 2019. Route 397. August 18.

¹⁰ San Mateo County Transit District. 2019. Route ECR. June 23.

¹¹ United States Census Bureau. 2018. American Community Survey: Means of Transportation to Work by Selected Characteristics for Workplace Geography.

¹² State of California, Department of Finance. 2019. E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011–2019. May.

¹³ Calculation: 2.4 persons/household X 9 units = 21.6 persons

as well as the BART and Caltrain stations, would encourage increased transit use rather than vehicle trips. Thus, the proposed project would not conflict with, or otherwise decrease the performance of any adopted policies, plans, or programs regarding public transit.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 subdivision (b)?

No impact. As shown in Table 1 above, the proposed project would generate less than five net peak period trips. Additionally, the project is within 0.5-mile of a transit stop along a high quality transit corridor as defined by California Public Resources Code 21155(b).¹⁴ Therefore, a vehicle miles traveled evaluation is not necessary and no impact would result under these criteria.

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

No impact. The proposed project's design does not increase hazards to traffic circulation.

The southern driveway would provide access to at-grade parking for residents, guests, and service/delivery vehicles. The driveway would be combined with the existing driveway for the adjacent building so that the total driveway width would be approximately 24 feet. A fence would separate the two properties' driveways.

The northern driveway would lead to an underground garage with 12 parking spaces for residents. The driveway exists today and is shared with the adjacent property. The driveway would lead to a garage ramp shown to be approximately 12 feet wide, which meets the City standard for parking areas with fewer than 30 spaces.

Within the underground parking garage, the drive aisle would have 90-degree perpendicular parking. The drive aisle would be 27 feet 10-inches wide, which meets the City standard and would provide sufficient space for vehicles to back out of the parking stalls. The proposed plan provides one turnaround space for residents to turn around and exit the underground parking garage.

From a review of the proposed site plan, sight distance for vehicles exiting the project site onto El Camino Real is sufficient in both directions because no street parking is allowed. To maintain adequate sight lines for vehicles leaving the site, the proposed project includes low-lying vegetation no greater than 3 feet in height between the two driveways. The project sponsor has also agreed to install a warning device at both project driveways to warn pedestrians of exiting vehicles. Therefore, no impacts would occur related to traffic hazards.

d) Result in inadequate emergency access?

No impact. The proposed project's southern driveway would provide access for emergency service personnel (e.g., fire, ambulance) responding to calls for service on-site, and would be required to meet all applicable standards. Consistent with General Plan Policy CS-2.3, project plans were reviewed to assure adequate access to fire equipment. Furthermore, the proposed project would not modify El Camino Real, which presently provides emergency access to other nearby properties. Therefore, no impacts would occur related to inadequate emergency access.

¹⁴ State of California. 2009. Public Resources Code Chapter 4.2: Implementation of the Sustainable Communities Strategy (Section 21155). January 1.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Noise <i>Would the project result in:</i>				
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"/>

Environmental Evaluation

Characteristics of Noise

Noise is generally defined as unwanted sound. Sound becomes unwanted when it interferes with normal activities, causes physiological harm or interferes with communication, work, rest, recreation, and sleep. The vibration of sound pressure waves in the air produces sound. Sound pressure levels are used to measure the intensity of sound and are described in terms of decibels. The decibel (dB) is a logarithmic unit, which expresses the ratio of the sound pressure level being measured to a standard reference level. The 0 point on the dB scale is based on the lowest sound level that the healthy, unimpaired human ear can detect. Changes of 3 dB or less are only perceptible in laboratory environments. Audible increases in noise levels generally refer to a change of 3 dB or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. Only audible changes in existing ambient or background noise levels are considered potentially significant.

An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense, and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness. Sound intensity is normally measured through the A-weighted sound level. A-weighted decibels (dBA) approximate the subjective response of the human ear to a broad frequency noise source by discriminating against very low and very high frequencies of the audible spectrum. They are adjusted to reflect only those frequencies that are audible to the human ear.

Noise Descriptors

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound, including during sensitive times of the day and night. The predominant rating scales in the State of California are the equivalent sound level (L_{eq}), the community noise equivalent level (CNEL), and the day-night average sound level (L_{dn}) are based on dBA. The equivalent continuous sound level (L_{eq}) is the total sound energy of time varying noise over a sample period. The CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly L_{eq} for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). The L_{dn} is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and L_{dn} measurements are typically within 1 dBA of each other and are normally exchangeable. These additions are made to the sound levels at these times because there is a decrease in the ambient noise levels during the evening and nighttime hours, which creates an increased sensitivity to sounds. For this reason, sound is perceived to be louder in the evening and nighttime hours as compared with daytime hours, and is weighted accordingly. Many cities rely on the CNEL noise standard to assess transportation-related impacts on noise-sensitive land uses.

Regulatory Framework

The project site is located within the City of Burlingame, which is within San Mateo County. This analysis was performed using the City's noise regulations. The City of Burlingame addresses its policies and regulations for noise in the Community Safety Element of the City of Burlingame General Plan and in the City's Code of Ordinances.^{15,16}

City of Burlingame General Plan

The City of Burlingame General Plan establishes noise standards for various land uses. The policies contained in the Noise section of the Community Safety Element serve as a guide for identifying noise levels, and reducing or avoiding adverse noise effects on residents. According to the City's General Plan, potential construction and vibration impacts are subject to a noise study ensuring nearby sensitive uses would not be impacted, and that all feasible mitigation measures are met.

City of Burlingame Municipal Code

The City also addresses noise in the noise ordinances of the Municipal Code. These ordinances intended to implement the policies of the noise element of the General Plan and provide standards for noise mitigation that are intended to limit exposure to unhealthy effects of noise.

The City does not set a specific quantifiable noise level limit for construction. Rather, construction activity noise is regulated by limiting construction activity to the least intrusive periods; thus, the City provides an exemption to the noise performance standards for construction activities under specified conditions. Section 18.07.110 limits the hours of construction to between 8:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on Saturdays, except in the case of urgent necessity in the interest of public health and safety, and then only with written approval from the

¹⁵ City of Burlingame. 2018. Community Safety Element. January.

¹⁶ City of Burlingame. 2017. Burlingame Municipal Code.

building official. No person shall erect (including excavation and grading), demolish, alter or repair any building or structure on Sundays or on holidays.

The City sets noise limits and operational requirements for mechanical equipment in Burlingame Municipal Code Section 25.58.050. According to this section, mechanical equipment shall include machines and devices, including heating, ventilation, and air conditioning (HVAC) units, fans, vents, generators, and elevator motors integral to the regular operation of climate control, electrical, and similar building systems. Mechanical equipment may only be located in the rear 75 percent of the lot. Mechanical equipment shall not exceed a maximum daytime (7:00 a.m.–10:00 p.m.) outdoor noise level of 60 dBA nor a maximum nighttime (10:00 p.m.–7:00 a.m.) outdoor noise level of 50 dBA as measured at the receiving property.

- 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?**

Short-term Construction Impacts

Less than significant impact. A significant impact would occur if the proposed project resulted in the exposure of persons to or generation of noise levels that exceed the standards established by the City of Burlingame General Plan or City noise ordinance. Noise impacts from construction activities associated with the proposed project would be a function of the noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities.

Two types of short-term noise impacts could occur during the construction of the proposed project. First, construction crew commutes and the transport of construction equipment and materials to the project site would incrementally increase noise levels on access roads leading to the project site (vehicle engine noise, the sound of vehicle doors shutting, etc.). Although there would be a relatively high single event noise exposure potential causing intermittent noise nuisance, the effect on longer-term (hourly or daily) ambient noise levels would be small. Therefore, short-term construction-related impacts associated with worker commute and equipment transport to the project site would be less than significant.

The second type of short-term noise impact is related to noise generated during construction on the project site. Construction is completed in discrete steps, each of which has its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on the site and, therefore, the noise levels surrounding the site as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction related noise ranges to be categorized by work phase.

The site preparation construction phase is expected to require the use of front-end loaders, compactors, hydraulic backhoes, and haul trucks. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4

minutes at lower power settings. Impact equipment such as pile drivers is not expected to be used during construction of this project.

Because the noisiest construction equipment is earthmoving equipment, the site preparation phase is expected to be the loudest phase of construction. A characteristic of noise is that each doubling of the sound sources with equal strength increases the noise level by 3 dBA. Assuming that each piece of construction equipment operates at some distance from the other equipment, the worst-case combined noise level during this phase of construction would be 90 dBA L_{max} at a distance of 50 feet from an active construction area. The acoustical center reference is used because construction equipment must operate at some distance from one another on a project site, and the combined noise level as measured at a point equidistant from the sources (acoustic center) would be the worst-case maximum noise level. These operations would be expected to result in a reasonable worst-case hourly average of 86 dBA L_{eq} at a distance of 50 feet from the acoustic center of a construction area.

Construction of the proposed project would require the use of heavy construction equipment. The closest sensitive receptor to proposed areas of construction is the two-story apartment building located at 1461 El Camino Real, northwest of the project site. The façade of the closest apartment would be located approximately 55 feet from the acoustic center of construction activity where multiple pieces of heavy construction equipment would potentially operate at the project site. At this distance, worst-case construction noise levels could range up to approximately 89.2 dBA L_{max} , intermittently, and could have an hourly average of up to 85.2 dBA L_{eq} , at the façade of the nearest receiving apartment unit when multiple pieces of equipment operate simultaneously at the nearest center of construction activity. These noise levels would occur for only a short period, as noise levels would drop off at a rate of 6 decibels per doubling of distance as construction equipment moves across the site.

However, the proposed project will comply with permissible hours of construction outlined in Section 18.07.110 of the Municipal Code, which limits the hours of construction to between 8:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on Saturdays. No construction activities shall be permitted on Sundays or holidays. Compliance with these hours of construction would ensure that proposed project construction activities would not result in a substantial temporary increase in ambient noise levels that would result in annoyance or sleep disturbance of nearby sensitive receptors, and the impact would be less than significant.

Operational/Stationary Source Noise Impacts

Less than significant impact. A significant impact would occur if operational noise levels generated by the proposed project would result in a substantial permanent increase in ambient noise levels in excess of any of the noise performance thresholds established by the City of Burlingame.

Mechanical Equipment Operations

The City sets noise limits and operational requirements for mechanical equipment in Section 25.58.050 of its Municipal Code. This section requires that mechanical equipment shall not exceed a

maximum daytime (7:00 a.m.–10:00 p.m.) outdoor noise level of 60 dBA, nor a maximum nighttime (10:00 p.m.–7:00 a.m.) outdoor noise level of 50 dBA as measured from the property line.

At the time of preparation of this analysis, details were not available pertaining to proposed mechanical ventilation systems for the project. Therefore, a reference noise level for typical residential mechanical ventilation systems was used. Noise levels from typical residential mechanical ventilation equipment are sound rated from 45 dBA to 60 dBA L_{eq} as measured at approximately 3 feet from the operating unit.

Mechanical ventilation systems could be located as close as 25 feet from the nearest off-site residential receptor, a two-story apartment building located at 1461 El Camino Real, northwest of the project site. At this distance, noise generated by mechanical ventilation equipment would attenuate to less than 42 dBA L_{eq} at the façade of the nearest noise-sensitive receptor. These noise levels would not exceed the City's normally acceptable threshold of a maximum outdoor noise level of up to 60 CNEL.

Therefore, proposed mechanical ventilation equipment operational noise levels, as measured at the façade of the nearest off-site receptors, would not result in a substantial permanent increase in ambient noise levels in excess of the City's acceptable land use compatibility standards as measured at the nearest receiving properties; and the impact would be less than significant.

Traffic Noise Impacts

A significant impact would occur if the proposed project would result in a substantial permanent increase in ambient noise levels in the project vicinity. However, the City does not define "substantial increase." Therefore, for the purposes of this analysis, a substantial increase is based on the following criteria. As noted in the characteristics of noise discussion, audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, a significant impact would occur if the project would cause the L_{dn} to increase by more than 5 dBA.

The proposed project would result in the addition of approximately 25 daily vehicle trips on nearby roadways, including one new trip during the AM peak-hour and two new trips during the PM peak-hour. These project trips would not result in a doubling of traffic volumes along any roadway segment in the project vicinity on an hourly or on a 24-hour average basis. As a result, the project would not result in even a perceptible increase (defined to be a 3 dBA or greater) in traffic noise levels along any roadway segment in the project vicinity, and any increase would be well below the threshold of a 5 dBA increase that would be considered substantial. Therefore, impacts from project-related traffic noise levels would not result in a substantial permanent increase in traffic noise levels in excess of applicable standards, and the impact would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact. A significant impact would occur if the proposed project would generate groundborne vibration or groundborne noise levels in excess of established standards. For determining construction-related vibration impacts, the Federal Transit Administration (FTA) Construction Vibration Impact Criteria are utilized. The FTA has established industry accepted standards for vibration impact assessment in its Transit Noise and Vibration Impact Assessment Manual, dated September 2018.

Groundborne noise is generated when vibrating building components radiate sound, or noise generated by groundborne vibration. In general, if groundborne vibration levels do not exceed levels considered perceptible, then groundborne noise levels would not be perceptible in most interior environments. Therefore, this analysis focuses on determining exceedances of groundborne vibration levels.

In extreme cases, excessive groundborne vibration has the potential to cause structural damage to buildings. Common sources of groundborne vibration include construction activities such as blasting, pile driving and operating heavy earthmoving equipment. However, construction vibration impacts on building structures are generally assessed in terms of peak particle velocity (PPV). For purposes of this analysis, project related impacts are expressed in terms of PPV.

Short-term Construction Vibration Impacts

A significant impact would occur if existing structures at the project site or in the proposed project vicinity would be exposed to groundborne vibration levels in excess of levels established by the FTA's Construction Vibration Impact Criteria for the type of structure.

As noted in the project description, the [Project construction methods will not include the use of impact, sonic, or vibratory pile driving methods. In addition, foundation compaction techniques will exclude the use of vibratory rollers on the project site and will exclude the use of all vibration-compaction equipment within 25-feet of the project boundaries.](#)

Therefore, of the variety of equipment anticipated to be used during construction, a large bulldozer is the equipment that would produce the greatest groundborne vibration levels. Large bulldozers produce groundborne vibration levels ranging up to 0.089 inch per second (in/sec) PPV at 25 feet from the operating equipment.

The nearest off-site receptor to the project site is the two-story apartment building located at 1461 El Camino Real, northwest of the project site. The façade of this building would be located approximately 15 feet from the nearest construction footprint where the heaviest construction equipment would potentially operate. At this distance, groundborne vibration levels would range up to 0.19 PPV from operation of a large bulldozer, the type of equipment that would be used on the site that would produce the highest vibration levels. These levels are below the FTA's vibration impact threshold of 0.20 in/sec PPV for buildings that are of non-engineered timber and masonry construction. Therefore, construction-related vibration impacts would be less than significant and proposed project construction activities would not generate excessive groundborne vibration levels.

Operational Vibration Impacts

A significant impact would occur if the proposed project would generate excessive groundborne vibration levels at sensitive receptors in the project vicinity.

Implementation of the proposed project would not include any permanent sources of vibration that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use near the project site. Therefore, operational groundborne vibration impacts would 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?**

No impact. The closest airport to the project site is the San Francisco International Airport, located approximately 1.2 miles north of the project site's northern boundary. The project site is not located within the 60 dBA CNEL forecast 2020 airport noise contours. In addition, the project site is not located with the vicinity of a private airstrip. Therefore, the proposed project would not expose persons residing or working in the project area to noise levels in excess of established standards or any noise land use compatibility standards. Therefore, no impact would occur.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Air Quality <i>Would the project:</i>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 or) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Introduction

Air pollutants relevant to the CEQA checklist questions for Air Quality are briefly described below.

- Ozone is a gas that forms when reactive organic gases (ROG) and nitrogen oxides (NO_x)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are conducive to its formation. Health effects can include, but not be limited to irritated respiratory system, reduced lung function, and aggravated chronic lung diseases.
- ROG, or volatile organic compounds (VOCs), are defined as any compound of carbon—excluding carbon monoxide (CO), carbon dioxide (CO₂), carbonic acid, metallic carbides or carbonates, and ammonium carbonate—that participates in atmospheric photochemical reactions. Although there are slight differences in the definition of ROG and VOCs, the two terms are often used interchangeably.
- Nitrogen dioxide (NO₂) forms quickly from NO_x emissions. Health effects from NO₂ can include the following: potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; contribution to atmospheric discoloration; increased visits to hospital for respiratory illnesses.
- CO is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during the winter morning, with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines—unlike ozone—and motor vehicles operating at slow speeds are a

primary source of CO in the Sonoma County region, the highest ambient CO concentrations are generally found near congested transportation corridors and intersections. Potential health effects from CO depends on exposure and can include slight headaches; nausea; aggravation of angina pectoris (chest pain) and other aspects of coronary heart disease; decreased exercise tolerance in persons with peripheral vascular disease and lung disease; impairment of central nervous system functions; possible increased risk to fetuses; death.

- Respirable Particulate Matter (PM₁₀) and Fine Particulate Matter (PM_{2.5}) consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities. Health effects from short-term exposure (hours/days) can include the following: irritation of the eyes, nose, throat; coughing; phlegm; chest tightness; shortness of breath; aggravate existing lung disease, causing asthma attacks and acute bronchitis; those with heart disease can suffer heart attacks and arrhythmias. Health effects from long-term exposure can include the following: reduced lung function; chronic bronchitis; changes in lung morphology; or death.
- Toxic air contaminants (TACs) refer to a diverse group of air pollutants that can affect human health, but have not had ambient air quality standards established for them. Diesel particulate matter (DPM) is a TAC emitted from construction equipment and diesel fueled vehicles and trucks. Some short-term (acute) effects of DPM exposure include eye, nose, throat, and lung irritation, coughs, headaches, light-headedness, and nausea. Studies have linked elevated particle levels in the air to increased hospital admissions, emergency room visits, asthma attacks, and premature deaths among those suffering from respiratory problems. Human studies on the carcinogenicity of DPM demonstrate an increased risk of lung cancer, although the increased risk cannot be clearly attributed to diesel exhaust exposure.

The project site is located in the San Francisco Bay Area Air Basin (Air Basin), within the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). The Air Basin is currently designated as a nonattainment area for 1-hour ozone (State), 8-hour ozone (State and national), 24-hour PM₁₀ (State), annual PM₁₀ (State), and PM_{2.5} (State and national). The Air Basin's nonattainment status is attributed to the region's development history. Past, present and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a project's contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant.

The thresholds contained in the BAAQMD CEQA Guidelines are considered regional thresholds and are shown in Table 3. Development of these regional thresholds was based on the BAAQMD's treatment of a project-level source.

Table 3: BAAQMD Thresholds of Significance

Pollutant	Construction Thresholds Average Daily Emissions (pounds/day)	Operational Thresholds	
		Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
Criteria Air Pollutants			
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82 (exhaust)	82	15
PM _{2.5}	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance, other BMPs (BAAQMD Basic Construction Mitigation Measures)	Not Applicable	
Notes: ROG = reactive organic gas NO _x = oxides of nitrogen ppm = parts per million PM ₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 µm or less PM _{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less Source: BAAQMD. 2017. CEQA Air Quality Guidelines. May.			

Would the project:

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

Less than significant impact. The project would not significantly conflict with or obstruct implementation of an Air Quality Attainment Plan. The project site is within the San Francisco Bay Area Air Basin. As previously mentioned, the BAAQMD regulates air emissions in the Air Basin.

The BAAQMD is required, pursuant to the Clean Air Act, to reduce emissions of criteria pollutants for which the Air Basin is in non-attainment for. The Air Basin is currently designated as a nonattainment area for 1-hour ozone (State), 8-hour ozone (State and national), 24-hour PM₁₀ (State), annual PM₁₀ (State), and PM_{2.5} (State and national). Strategies to achieve emissions reductions are in the 2017 Multi-Pollutant Clean Air Plan prepared by BAAQMD for the region.¹⁷ The Clean Air Plan is based on the Association of Bay Area Governments' (ABAG) population projections as well as land use designations and population projections included in general plans for communities within the basin. Population growth is typically associated with the construction of residential units or large employment centers. A project would be inconsistent with the Clean Air Plan if it resulted in population and/or employment growth in excess of the ABAG growth estimates for the area. The proposed project does not include large residential development or large local or regional

¹⁷ Bay Area Air Quality Management District (BAAQMD). 2017. Spare the Air, Cool the Climate: Final 2017 Clean Air Plan. April 19.

employment centers, and therefore would not result in significant population or employment growth. Furthermore, since the existing General Plan and Zoning designations allow on-site multi-family development, and the project is consistent with the density allowed under the existing general plan land use designation and zoning, it can be assumed that the potential for future on-site residential development has been previously contemplated for the site. In addition, the proposed project is a small residential development that does not exceed the BAAQMD operational and construction threshold levels for criteria pollutants (see Table 3 and Table 4). As such, there are no significant adverse regional air quality impacts from such projects since they are proposed in compliance with area population growth. The proposed development is subject to the requirements of the United States Environmental Protection Agency (EPA), the California Air Resources Board (ARB), and the BAAQMD. The proposed project would be required to comply with all existing and new rules and regulations that are implemented by the EPA, the ARB, and the BAAQMD. The proposed project would not significantly conflict with or obstruct implementation of the applicable Clean Air Plan, and no further analysis related to potential conflicts with air quality plans is required. Therefore, impacts would be less than significant.

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?

Less than significant impact. This impact is related to the cumulative effect of a project's regional criteria pollutant emissions. The cumulative analysis focuses on whether a specific project would result in cumulatively considerable emissions. According to CEQA Guidelines Section 15064(h)(4), the existence of significant cumulative impacts caused by other projects alone does not constitute substantial evidence that the project's incremental effects would be cumulatively considerable. Rather, the determination of cumulative air quality impacts for construction and operational emissions is based on whether the project would result in regional emissions that exceed the BAAQMD regional thresholds of significance for construction and operations on a project level. The thresholds of significance represent the allowable amount of emissions each project can generate without generating a cumulatively considerable contribution to regional air quality impacts. Therefore, a project that would not exceed the BAAQMD thresholds of significance on the project level also would not be considered to result in a cumulatively considerable contribution to these regional air quality impacts. Construction and operational emissions are discussed separately below.

Construction Emissions

During construction, site grading and other earth moving activities would generate fugitive dust (PM₁₀ and PM_{2.5}). The majority of this fugitive dust would remain localized and be deposited near the project site. However, the potential for impacts from fugitive dust exists unless control measures are implemented to reduce the emissions from this source. Operation of the off-road construction equipment would also generate exhaust emissions.

Construction Fugitive Dust

The BAAQMD does not recommend a numerical threshold for fugitive dust particulate matter emissions. Instead, the BAAQMD bases the determination of significance for fugitive dust on a consideration of the control measures to be implemented. If all appropriate emissions control

measures recommended by the BAAQMD are implemented for a project, then fugitive dust emissions during construction are not considered significant. The following air BMPs are recommended:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (California Code of Regulations [CCR] Title 13 § 2485). Clear signage regarding idling restrictions shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- The prime construction contractor shall post a publicly visible sign with the telephone number and person to contact at the City of Burlingame regarding dust complaints. The City of Burlingame and the construction contractor shall take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

The proposed project would implement BMPs recommended by the BAAQMD as a standard condition of approval (COA). Therefore, short-term construction impacts associated with the generation of fugitive dust would be less than significant.

Construction: ROG, NO_x, PM₁₀, PM_{2.5}

The 2017 Air Quality Guidelines provide screening criteria developed for criteria pollutants and precursors.¹⁸ According to the 2017 Air Quality Guidelines, if the project meets the screening criteria then its air quality impacts relative to the criteria pollutants may be considered less than significant. In developing the 2017 Air Quality Guidelines, the BAAQMD also considered the emission levels for which a project's individual emissions would be cumulatively considerable. For construction specifically, the project would result in a less than significant impact to air quality if the following screening criteria are met:

1. The project is below the applicable screening level size (see Table 4).

¹⁸ Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Air Quality Guidelines. May.

2. All basic construction mitigation measures would be included in the project design and implemented during construction.
3. Construction-related activities would not include any of the following:
 - a) Demolition;
 - b) Simultaneous occurrence of more than two construction phases (e.g., paving and building construction would occur simultaneously);
 - c) Simultaneous construction of more than one land use type (e.g., project would develop residential and commercial uses on the same site) (not applicable to high density infill development);
 - d) Extensive site preparation (i.e., greater than default assumptions for grading, cut/fill, or earth movement); or
 - e) Extensive material transport (e.g., greater than 10,000 cubic yards of soil import/export) requiring a considerable amount of haul truck activity.

Table 4: Criteria Air Pollutant and Precursors Screening Level for Construction Emissions

Land Use	Screening Size	Project Size
Condominium/townhouse, general	240 DU	9 DU
DU = dwelling units Source: Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. January 5. Website: http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status . Accessed August 2019.		

The proposed project would result in the demolition of the existing residential buildings and subsequent construction of nine condominium units. Although the project size would not exceed the BAAQMD screening size thresholds, the proposed project would not meet all of the screening criteria outlined by the BAAQMD. Unless the proposed project meets all of the screening criteria, construction activities may have the potential to generate significant quantities of air pollutants. As listed below, the proposed project would meet some of the other screening criteria:

- As a standard COA, the proposed project would include all basic construction Best Management Practices;
- Construction-related activities would not violate the screening size (refer to Table 4);
- Construction would involve demolition;
- The proposed project may involve the simultaneous occurrence of more than two construction phases or construction of more than one land use type;
- Site preparation is not expected to be greater than default values;
- The proposed project would require the removal of the existing duplex, the existing single-family home, and existing hardscape during the demolition phase. It was estimated that the existing hardscape and buildings would generate approximately 312 tons of debris,¹⁹ and 31

¹⁹ See Appendix B for the calculations used to estimate the amount of debris expected to be removed in the demolition phase.

hauling trips would be required during the demolition phase. During the grading phase, the proposed project is expected to require the excavation and removal of material totaling approximately 1,421 cubic yards and no import of material. As such, the proposed project would not require extensive material transport requiring a considerable amount of haul truck activity in excess of haul truck activity exceeding the screening criteria of 10,000 cubic yards.

Because the detailed construction is unknown at this time, there is no certainty that the proposed project would not involve the simultaneous occurrence of more than two construction phases; therefore, it was assumed that the proposed project would not meet this criterion. Based on the preliminary construction schedule (Table 5), the proposed project is likely to involve the simultaneous occurrence of multiple construction activities. In addition, the proposed project would require demolition of existing structures currently occupying the project site. Thus, the proposed project cannot be deemed less than significant using the screening method, and proposed project construction emissions must be compared with the BAAQMD significance thresholds.

Construction of the proposed project was assumed to begin in March 2020 and last for 12 months. Construction emissions would likely decrease because of improvements in technology and more stringent regulatory requirements if the construction schedule moves to later years. The preliminary construction schedule is provided in Table 5.

Table 5: Preliminary Construction Schedule

Construction Phase	Construction Schedule		Total Number of Working Days
	Start Date	End Date	
Demolition	3/1/2020	3/13/2020	10
Site Preparation	3/14/2020	3/27/2020	10
Grading	3/28/2020	7/17/2020	80
Building Construction	8/1/2020	1/15/2021	120
Paving	1/1/2021	1/28/2021	20
Architectural Coating	1/5/2021	3/1/2021	40
Source: Appendix B.			

The duration of construction activity and associated equipment represent a reasonable approximation of the expected construction fleet as required by CEQA Guidelines. The construction parameters used in estimating air pollutant emissions are included in Appendix B. Table 6 below summarizes the construction-generated emissions in tons per day, while the construction-related emissions in average daily pounds is shown in Table 7. As provided in Table 7, the BAAQMD's regional emission thresholds for construction exhaust would not be exceeded for any regional pollutant. Therefore, the proposed project would have a less than significant regional emissions impact from proposed project construction.

Table 6: Annual Construction Emissions (Unmitigated)

Construction Activity	Tons/Year			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
2020				
Demolition	0.00	0.04	0.00	0.00
Site Preparation	0.00	0.04	0.00	0.00
Grading	0.04	0.34	0.02	0.02
Building Construction—2020	0.05	0.50	0.03	0.03
2021				
Building Construction—2021	0.00	0.05	0.00	0.00
Paving	0.01	0.07	0.00	0.00
Architectural Coating	0.09	0.03	0.00	0.00
2020–2021				
Total Construction Emissions	0.20	1.08	0.06	0.06
Notes: ROG = reactive organic gas NO _x = oxides of nitrogen PM ₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 µm or less PM _{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less Unrounded numbers from the California Emissions Estimator Model (CalEEMod) output were used for all calculations; therefore, sums may appear not to total correctly due to rounding. Source of Emissions: Appendix B.				

Table 7: Construction Emissions (Unmitigated Average Daily Rate)

Parameter	Air Pollutants			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
Total Emissions (tons/year)	0.20	1.08	0.06	0.06
Total Emissions (lbs/year)	396	2,155	119	111
Average Daily Emissions (lbs/day) ¹	1.52	8.26	0.45	0.42
Significance Threshold (lbs/day)	54	54	82	54
Exceeds Significance Threshold?	No	No	No	No
Notes: lbs = pounds ROG = reactive organic gas NO _x = oxides of nitrogen PM ₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 µm or less PM _{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less ¹ Calculated by dividing the total lbs by the 261 total working days of construction for the duration of construction (March 2020 through March 2021). Calculations use unrounded totals. Source: Appendix B.				

As shown in Table 7, the construction emissions from all construction activities are well below the recommended thresholds of significance; therefore, construction of the proposed project would have a less than significant impact in regards to emissions ROG, NO_x, exhaust PM₁₀, and exhaust PM_{2.5}. As previously discussed, the proposed project would implement BMPs recommended by the BAAQMD as a standard condition to reduce potential impacts related to fugitive dust emissions during the construction period. Therefore, proposed project construction would have a less than significant impact.

Long-term Operational Impacts

Generally, long-term operational emissions could result from project-related traffic and through the routine use of maintenance equipment. The BAAQMD 2017 Guidelines provide guidance and screening criteria for determining if a project could potentially result in significant air quality impacts. As shown in Table 8, the proposed project would not result in operational-related air pollutants or precursors that would exceed the BAAQMD's thresholds of significance. The operational criteria pollutant screening size for a condominium/townhouse general land use is 451 DU. The proposed project is well below the BAAQMD screening threshold, indicating that ongoing project operations would not be considered to have the potential to generate a significant quantity of air pollutants. Therefore, long-term operation impacts associated with criteria pollutant emissions would be less than significant.

Table 8: Criteria Air Pollutants and Precursors Screening Level Sizes for Operational Emissions

Land Use Type	Operational Criteria Pollutant Screening Size	Project Size
Condominium/townhouse, general	451 DU	9 DU
DU = dwelling units Source: Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. January. Website: http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status . Accessed August 2019.		

c) Expose sensitive receptors to substantial pollutant concentrations?

Less than significant impact. A project would expose sensitive receptors to substantial pollutant concentrations if emissions from the project would exceed ambient air quality standards for criteria pollutants or cause a significant increase in cancer risk from exposure to TACs at the location of the nearest sensitive receptor. To assist the lead agency in evaluating air quality impacts at the community scale, thresholds of significance listed in Table 3 have been established for local community risks and hazards associated with TACs and PM_{2.5} with respect to siting a new source and/or receptor.

The project site is surrounded by El Camino Real to the north; medium/high density residential use and El Camino Real to the east; medium density residential use to the west; and low density residential use to the south. Predominantly residential land uses surround the project site.

Residential areas are considered sensitive to air pollution exposure. Given its residential nature, the proposed project would produce minimal emissions during project operations. During proposed project construction, the operation of diesel-powered equipment would emit PM_{2.5} and DPM that could affect sensitive receptors in the project vicinity, the closest of which include multi-family residential buildings located approximately 15 feet from the proposed project's construction footprint. The maximum daily construction emissions were evaluated using the California Emissions Estimator Model (CalEEMod). It should be noted that maximum daily emissions are the highest emissions that could occur on any single day. The results of the analysis are included in Table 9. As shown, off-site construction emissions are not projected to exceed BAAQMD thresholds and therefore are not projected to pose a human health risk. After proposed project grading and site preparation, only limited use of diesel-powered equipment would be necessary for the aboveground construction portion of the proposed project.

Table 9: Off-site Construction Emissions

Activity/Year	Peak Daily Emissions (lb/day)			
	ROG	NO _x	PM ₁₀ (Exhaust)	PM _{2.5} (Exhaust)
2020				
Demolition	0.93	8.90	0.47	0.45
Site Preparation	0.70	8.44	0.34	0.31
Grading	0.92	8.62	0.47	0.45
Building Construction—2020	0.91	9.22	0.52	0.48
2021				
Building Construction—2021	0.82	8.32	0.45	0.41
Paving	0.79	6.75	0.35	0.33
Architectural Coating	4.57	1.53	0.09	0.09
Overlap of 2021 Building Construction, Paving, and Architectural Coating	6.17	16.60	0.90	0.84
2020–2021				
Maximum Daily Emissions	6.17	16.60	0.90	0.84
BAAQMD Screening Thresholds	54	54	82	54
Exceeds Threshold?	No	No	No	No
Notes: ROG = reactive organic gas NO _x = oxides of nitrogen PM ₁₀ = coarse particulate matter or particulates with an aerodynamic diameter of 10 µm or less PM _{2.5} = fine particulate matter or particulates with an aerodynamic diameter of 2.5 µm or less Source of Emissions: Appendix B.				

The motor vehicle trips generated by the project would produce CO emissions. CO emissions can contribute to CO hotspots that could result in an impact to sensitive receptors if traffic volumes and congestion reach high levels. According to the BAAQMD screening guidelines, a project would result in a significant CO impact if it would produce high volumes of traffic that would exceed the air quality 8-hour standard of 9.0 parts per million (ppm), or the 1-hour standard of 20.0 ppm, or that would contribute considerably to intersections with high levels of existing congestion.

Table 10 presents the forecasted average daily trips for the proposed project based on the traffic analysis prepared for the project by Hexagon.²⁰

Table 10: Project-specific Trip Generation Rates

Land Use	Quantity	Units	Daily Trips (trips/day)
Proposed Land Use			
Multi-family Housing	9	DU	49
Existing Land Use			
Single-family Home	1	DU	-9
Duplex Apartments	2	DU	-15
Proposed Increase in Average Daily Trips			
Net Project Trips			25
Notes: DU = dwelling units Source: Hexagon Transportation Consultants, Inc. 2019. Trip Generation Analysis and Site Review for the Proposed Condominium Located at 1457 El Camino Real in Burlingame, California. July 17.			

The project would not produce high volumes of traffic needed to exceed the air quality standard for CO (9.0 ppm, 8-hour and 20.0 ppm, 1-hour) or that would contribute considerably to intersections with high levels of existing congestion. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant.

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

Less than significant impact. The proposed project would not be expected to emit any significant objectionable odors, which may affect a substantial number of people. Land uses that have the potential to create objectionable odors, (such as landfills, waste recycling facilities, agriculture, wastewater treatment plants, food processing plants, chemical plants, composting, dairies, etc.) are not part of the proposed project. Short-term construction-related impacts could result from the use of construction equipment and the resulting diesel exhaust, such as graders, dump trucks, and worker vehicles, as well as from fugitive dust during excavation and site preparation activities. Long-

²⁰ Hexagon Transportation Consultants, Inc. 2019. Trip Generation Analysis and Site Review for the Proposed Condominium Located at 1457 El Camino Real in Burlingame, California. July 17.

term, operational air quality impacts could occur from vehicle emissions related to automobile trips to and from the proposed project site. Emissions from VOCs from architectural coatings and paving activities may generate objectionable odors as well; however, these odors would be temporary and would not be expected to affect a substantial number of people, as the proposed project will take approximately 12 months to complete. The only operational odor sources associated with the proposed project would be typical waste management activities associated with a small residential project; however, proper maintenance and implementation of established waste management practices would be expected to reduce the potential for objectionable odors during proposed project operations to a less than significant level. Thus, potential impacts associated with objectionable odors would be less than significant, and no further analysis is required.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Greenhouse Gas Emissions <i>Would the project:</i>				
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 checked="" type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Introduction

Where available, the significance criteria established by the applicable air quality management or air pollution control district (in this case, the BAAQMD) may be relied upon to make the following determinations. Supporting information, including detailed greenhouse gas (GHG) emission estimates, is provided in Appendix B.

Would the project:

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

Less than significant impact. This analysis is restricted to GHGs identified by Assembly Bill 32 (AB 32), which include CO₂, methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. The proposed project would generate a variety of GHGs during construction and operation, including several defined by AB 32 such as CO₂, methane, and nitrous oxide.

The proposed project would not emit certain GHGs defined by AB 32. Perfluorocarbons and sulfur hexafluoride are typically used in industrial applications, none of which would be used by the proposed project. Therefore, it is not anticipated that the proposed project would emit perfluorocarbons or sulfur hexafluoride.

An upstream emission source (also known as life cycle emissions) refers to emissions that were generated during the manufacture of products to be used for construction of the proposed project. Upstream emission sources for the proposed project include but are not limited to emissions from the manufacture of cement, emissions from the manufacture of steel, and/or emissions from the transportation of building materials to the seller. The upstream emissions were not estimated because they are not within the control of the proposed project and to do so would be speculative. Additionally, the California Air Pollution Control Officers Association (CAPCOA) White Paper on CEQA and Climate Change supports this conclusion by stating, “The full life-cycle of GHG emissions from construction activities is not accounted for . . . and the information needed to characterize [life-cycle emissions]

would be speculative at the CEQA analysis level.”²¹ Therefore, pursuant to CEQA Guidelines Sections 15144 and 15145, upstream/life cycle emissions are speculative and no further discussion is necessary.

Short-term Construction Impacts

During project construction, GHG emissions would be generated by construction activities such as site preparation and grading/earthwork, the operation of heavy-duty construction vehicles, materials and debris hauling, asphalt paving, and construction worker vehicle trips. These emissions would be considered short-term in duration. The BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions; however, the BAAQMD does recommend that lead agencies quantify, disclose, and provide a significance determination for construction-related GHG emissions. Thus, the operational emissions bright-line threshold of 1,100 metric tons (MT) of CO₂ equivalents (CO₂e) per year is used for this analysis to determine significance of the project’s construction-related emissions.

Construction emissions were estimated using CalEEMod (version 2016.3.2). Construction of the proposed project was assumed to start in March 2020 and last 12 months. The construction phases are anticipated to include demolition, site preparation, site grading, building construction, paving, and architectural coating. Table 11 shows the GHG emissions estimated to be generated by proposed project construction, indicating that the construction-related GHG emissions are below 1,100 MT CO₂e for the construction year. Therefore, construction-related GHG emissions would be less than significant on a project basis.

Table 11: Construction Greenhouse Gas Emissions

Construction Phases	Total Emissions (MT CO ₂ e/year)
2020	
Demolition	7
Site Preparation	4
Grading	52
Building Construction—2020	64
2021	
Building Construction—2021	6
Paving	11
Architectural Coating	5
2020-2021	
Annual Construction Emissions	149
Threshold of Significance	1,100
Does project exceed threshold?	No
MT CO ₂ e = metric tons of carbon dioxide equivalent. Source: CalEEMod Output (see Appendix B).	

²¹ California Air Pollution Control Officers Association (CAPCOA). 2008. CEQA and Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act. January.

Long-term Operational Impacts

A preliminary screening method is provided in BAAQMD's 2017 Guidelines for operational GHGs.²² The preliminary screening is used to indicate whether a project's operational GHGs could potentially exceed BAAQMD's thresholds of significance. Based on the BAAQMD screening criteria, the operation of a condominium/townhouse general land use would result in a less than significant impact if the proposed project size were less than 78 DU. As shown in Table 12, the project is well below the BAAQMD's screening threshold. Because the proposed project would not exceed the BAAQMD's screening threshold based on size, ongoing project operations would not be considered to have the potential to generate GHG emissions that would have significant impact on the environment. Therefore, long-term operation impacts associated with operational GHG emissions would be less than significant.

Table 12: Operational Greenhouse Gas Screening Level Sizes

Land Use Type	Operational Greenhouse Gas Screening Size	Project Size
Condominium/townhouse, general	78 DU	9 DU
DU = dwelling units Source: Bay Area Air Quality Management District (BAAQMD). 2017. Air Quality Standards and Attainment Status. January. Website: http://www.baaqmd.gov/research-and-data/air-quality-standards-and-attainment-status . Accessed August 2019.		

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

Less than significant impact. As provided by BAAQMD's 2017 Air Quality Guidelines:²³

BAAQMD's approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move us towards climate stabilization. If a project would generate GHG emissions above the threshold level, it would be considered to contribute substantially to a cumulative impact, and would be considered significant.

Thus, if a project is less than the BAAQMD threshold of significance for GHGs, it stands to reason that the proposed project would not substantially conflict with existing California legislation adopted to reduce Statewide GHG emissions. As shown in GHG Impact 1, the proposed project would not exceed the BAAQMD's applicable threshold of significance for GHGs. Therefore, the proposed project would not substantially conflict with existing California legislation adopted to reduce Statewide GHG emissions. This analysis also analyzes whether the proposed project would conflict with either the City of Burlingame 2030 Climate Action Plan Update or the 2017 Climate Change Scoping Plan Update.

²² Bay Area Air Quality Management District (BAAQMD). 2017. CEQA Air Quality Guidelines. May.

²³ Ibid.

City of Burlingame Climate Action Plan

In 2009, the City of Burlingame prepared a Climate Action Plan (2009 CAP) to address the City's impacts to climate change.²⁴ The City adopted the 2030 CAP Update in 2019, which supersedes the 2009 CAP prepared by the City.²⁵ The 2030 CAP Update focuses on reducing annual GHG emissions assist Burlingame in reducing its emissions to align with the State's goals for 2020 and 2030. Projects consistent with the City's 2030 CAP would not conflict with the provisions of either AB 32 or Senate Bill 32 (SB 32).

The 2030 CAP Update provides methods and guidance to reduce GHG emissions in the City. The program and policy recommendations contained in the 2030 CAP were reviewed to determine if development of the proposed project would conflict with any of the recommendations. As discussed below, implementation of the proposed project would not conflict with the 2030 CAP Update. Moreover, the proposed project promotes several goals of the City of Burlingame 2030 CAP Update.^{26,27}

Implementation of the proposed project supports the City's goal to promote higher-density infill development on underutilized parcels, particularly near transit stations and stops. The proposed project would construct a four-story condominium complex containing nine units and is consistent with the 2030 CAP recommendation to encourage development that is infill and higher density. The proposed project site is currently developed with a single-story, approximately 1,700-square-foot duplex, and an approximately 700-square-foot, two-story home. Compared with the current land use, the proposed project would promote higher-density residential development. Furthermore, the proposed project includes a below-grade parking garage, in which bicycle storage could occur for both residents and visitors. By enabling bicycle storage, the proposed project would provide a safe and convenient option for bicycle transportation in the area. In addition, the proposed project would maintain the sidewalk along the project's El Camino Real frontage, which further promotes the goals and recommendations provided in the 2030 CAP. Future residents would have access to public transportation to connect to destinations throughout the greater Bay Area. Specifically, an existing bus stop along El Camino Real is located approximately 350 feet (0.07-mile) northwest of the project site. The project site is also located approximately 0.6-mile from Broadway Station, which is the closest train station. The proposed project's proximity to nearby transit would provide future residents and visitors with easy access to sustainable transportation options. The proposed project would also meet the requirements of the 2019 California Building Standards Code, including all of the latest regulatory standards for energy efficiency, sustainable development, and the enhancement of environmental quality.

In summary, the proposed project would not conflict with the City's 2030 CAP Update or the provisions of AB 32 or SB 32.

²⁴ City of Burlingame. 2009. City of Burlingame Climate Action Plan (2009 CAP). June.

²⁵ City of Burlingame. 2019. City of Burlingame 2030 Climate Action Plan (2030 CAP) Update. August 28.

²⁶ City of Burlingame. 2019. City Council/Planning Commission Retreat: Draft Climate Action Plan. April 27.

²⁷ City of Burlingame. 2019. City of Burlingame 2030 Climate Action Plan (2030 CAP) Update. August 28.

Senate Bill 32 2017 Scoping Plan Update

The 2017 Climate Change Scoping Plan Update addressing the SB 32 targets was adopted on December 14, 2017.²⁸ Table 13 provides an analysis of the proposed project's consistency with the 2017 Scoping Plan Update measures. As shown in Table 13, many of the measures are not applicable to the proposed project. Table 13 also indicates the applicable measures with which the proposed project is consistent.

Table 13: Consistency with Senate Bill 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Proposed Project Consistency
SB 350: 50 Percent Renewable Mandate. Utilities subject to the legislation will be required to increase their renewable energy mix from 33 percent in 2020, to 50 percent in 2030.	Not applicable. This measure would apply to utilities and not to individual development projects. The proposed project would purchase electricity from a utility subject to the SB 350 Renewable Mandate. The proposed project would have the option to receive electricity through Peninsula Clean Energy or PG&E. Peninsula Clean Energy and PG&E already meet or exceed the proposed 2020 renewable standards.
SB 350: Double Building Energy Efficiency by 2030. This is equivalent to a 20 percent reduction from 2014 building energy usage compared to current projected 2030 levels.	Not applicable. This measure applies to existing buildings. New structures are required to comply with Title 24 Energy Efficiency Standards that are expected to increase in stringency over time. The proposed project would comply with the applicable Title 24 Energy Efficiency Standards in effect at the time building permits are received.
Low Carbon Fuel Standard. This measure requires fuel providers to meet an 18 percent reduction in carbon content by 2030.	Not applicable. This is a Statewide measure that cannot be implemented by a project applicant or lead agency. However, vehicles accessing the proposed residential buildings at the project site would benefit from the standards.
Mobile Source Strategy (Cleaner Technology and Fuels Scenario). Vehicle manufacturers will be required to meet existing regulations mandated by the LEV III and Heavy-Duty Vehicle programs. The strategy includes a goal of having 4.2 million zero-emission vehicles (ZEVs) on the road by 2030 and increasing numbers of ZEV trucks and buses.	Not applicable. This measure is not applicable to the proposed project; however, vehicles accessing the future project site would benefit from the increased availability of cleaner technology and fuels. Future residents and visitors can be expected to purchase increasing numbers of more fuel-efficient and zero emission cars and trucks each year. Furthermore, delivery trucks and buses that would serve future residents will be made by increasing numbers of ZEV delivery trucks.
Sustainable Freight Action Plan. The plan's target is to improve freight system efficiency 25 percent by increasing the value of goods and services produced from the freight sector, relative to the amount of carbon that it produces by 2030. This would be achieved by deploying over 100,000 freight vehicles and equipment capable of zero emission operation and maximize near-zero emission freight vehicles and equipment powered by renewable energy by 2030.	Not applicable. This measure applies to owners and operators of trucks and freight operations. The proposed project is residential in nature and would not support truck and freight operations. It is expected that deliveries throughout the State would be made with an increasing number of ZEV delivery trucks, including deliveries that would be made to future residents.

²⁸ California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November.

Table 13 (cont.): Consistency with Senate Bill 32 2017 Scoping Plan Update

2017 Scoping Plan Update Reduction Measure	Proposed Project Consistency
Short-Lived Climate Pollutant (SLCP) Reduction Strategy. The strategy requires the reduction of SLCPs by 40 percent from 2013 levels by 2030 and the reduction of black carbon by 50 percent from 2013 levels by 2030.	Consistent. Consistent with BAAQMD Regulation 6, Rule 3, no wood-burning devices are proposed as part of the proposed project.
SB 375 Sustainable Communities Strategies. Requires Regional Transportation Plans to include a Sustainable Communities Strategy (SCS) for reduction of per capita vehicle miles traveled.	Not applicable. The proposed project does not include the development of a Regional Transportation Plan.
Post-2020 Cap-and-Trade Program. The Post 2020 Cap-and-Trade Program continues the existing program for another 10 years. The Cap-and-Trade Program applies to large industrial sources such as power plants, refineries, and cement manufacturers.	Not applicable. The proposed project is not one targeted by the cap-and-trade system regulations, and, therefore, this measure does not apply to the proposed project. However, the post-2020 Cap-and-Trade Program indirectly affects people and entities who use the products and services produced by the regulated industrial sources when increased cost of products or services (such as electricity and fuel) are transferred to the consumers.
Natural and Working Lands Action Plan. The ARB is working in coordination with several other agencies at the federal, State, and local levels, stakeholders, and with the public, to develop measures as outlined in the Scoping Plan Update and the governor's Executive Order B-30-15 to reduce GHG emissions and to cultivate net carbon sequestration potential for California's natural and working land.	Not applicable. The proposed project is residential development in a built-up urban area and would not be considered natural or working lands.
Source of ARB 2017 Scoping Plan Update Reduction Measures: California Air Resource Board (ARB). 2017. California's 2017 Climate Change Scoping Plan. November.	

Summary

The proposed project is consistent with the applicable policies and programs of the City of Burlingame's CAP and would not conflict with the recommendations of AB 32 in achieving a Statewide reduction in GHG emissions. Considering this information, the proposed project would not significantly hinder or delay the State's ability to meet the reduction targets contained in AB 32 or conflict with implementation of the Scoping Plan. Furthermore, as shown in Table 13, implementation of the proposed project would not conflict with the reduction measures proposed in SB 32. Considering this information, the proposed project would not conflict with any applicable plan, policy, or regulation of an agency adopted to reduce GHG emissions. The impact would be less than significant.

Environmental Issues	Potentially Significant Impact	Less than Significant Impact with Mitigation Incorporated	Less than Significant Impact	No Impact
Hydrology and Water Quality <i>Would the project:</i>				
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:				
i) result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input 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;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input 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 checked="" type="checkbox"/>	<input 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"/>

Would the project:

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

Less than significant impact. Regulations promulgated under the federal Clean Water Act require municipalities to obtain National Pollution Discharge Elimination System (NPDES) permits to regulate the discharge of pollutants from stormwater. Municipalities, such as the City of Burlingame, must eliminate or reduce “non-point” pollution, consisting of all types of substances generated as a result of urbanization (e.g. pesticides, fertilizers, automobile fluids, sewage, litter), to the “maximum extent practicable” (as required by Clean Water Act § 402(p)(3)(iii)).

Clean Water Act Section 402(p) and EPA regulations (40 Code of Federal Regulations [CFR] § 122.26) specify a municipal program of BMPs to control stormwater pollutants. BMPs refer to any kind of procedure or device designed to minimize the quantity of pollutants that enter the storm drain system. To comply with these regulations, San Mateo County, all of its cities (including the City of Burlingame), and the City/County Association of Governments (C/CAG) joined in 1990 to form the San Mateo Countywide Water Pollution Prevention Program.

In California, the Regional Water Quality Control Board (RWQCB) is authorized by the EPA to implement the NPDES program emanating from the federal Clean Water Act. The RWQCB does this through a Municipal Regional Permit (MRP), adopted on October 14, 2009, as the NPDES permit for all San Francisco Bay Region municipalities (including the City of Burlingame). The MRP includes a Provision C.3 that applies to the proposed project and requires the treatment of stormwater runoff. As of December 1, 2012, additional requirements, also applicable to the proposed project, went into effect requiring the incorporation of Low Impact Development (LID) site design features (such as runoff reduction features).

Mandatory compliance with the MRP ensures the proposed project would result in a less than significant impact on water quality through the implementation of applicable, uniform standards that, without limitation, minimize imperviousness, detain runoff, infiltrate runoff, treat runoff prior to discharge from the site, ensure runoff does not exceed pre-project peaks and durations, and provide long-term maintenance of treatment facilities. Such standards must be incorporated into the proposed project and apply to both construction and post-construction periods.

The proposed project would, with implementation of mandatory stormwater quality treatment methods noted above, result in a less than significant impact relative to the topic of stormwater quality.

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

No impact. The City of Burlingame does not utilize significant groundwater supply or participate in management of the Westside Groundwater Basin.²⁹ No pumping activities currently occur at the project site. The proposed project does not propose to use or pump groundwater, and, therefore would not deplete groundwater supplies or interfere substantially with groundwater recharge. Because of the high water table, dewatering of the site during the construction of the below-grade parking garage may be required. This would be temporary and comply with the MRP BMPs. The proposed project would result in no impact under this criterion.

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:

i) result in substantial erosion or siltation on- or off-site?

No impact. The proposed project would not substantially alter existing drainage patterns and, as such, would not result in substantial erosion or siltation on- or off-site. The project site is currently

²⁹ Erler & Kalinowski, Inc. 2016. 2015 Urban Water Management Plan for the City of Burlingame. June.

developed and the proposed general pattern of stormwater drainage would be similar to existing conditions. The proposed project would not alter a stream or river. Therefore, the proposed project would result in no impact under this criterion.

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

Less than significant impact. The project site is currently covered by 6,514 square feet of impervious surfaces, and all stormwater runoff from the site is directed to the municipal stormwater conveyance system, otherwise known as a Municipal Separate Storm Sewer System (MS4) located in El Camino Real. The proposed project would result in approximately 7,418 square feet of impervious surface, an increase of 904 square feet or 14 percent. Stormwater from the site would continue to be directed to the MS4 located in El Camino Real. The proposed project would not create or contribute runoff water that would result in additional sources of polluted runoff because of the mandatory compliance with the MRP. No stream or river is present on-site. Thus, the proposed project would result in a less than significant impact relative to drainage patterns and stormwater runoff.

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

Less than significant impact. The project site is within a 0.2 percent annual chance flood hazard zone.³⁰ It is unlikely that the project site would experience flooding, and so would have a less than significant impact on flows.

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

Less than significant impact. A seiche is a tidal change in an enclosed or semi-enclosed water body caused by sustained high winds or an earthquake. Tsunamis are seismically induced sea waves that, upon entering shallow near-shore waters, may reach heights capable of causing widespread damage to coastal areas. The proposed project is not located nearby any water body with the potential to generate a seiche, and is in an urbanized area with no potential for exposure to mudflows. Though the proposed project is within a coastal city, the project site is inland and not subject to tsunami inundation, based on maps prepared by the California Emergency Management Agency.³¹ The project site is within a 0.2 percent annual chance flood hazard zone.³² Therefore, impacts related to risk of pollutant release due to inundation would be less than significant.

³⁰ Federal Emergency Management Agency (FEMA). 2019. Flood Map Number 06081C0153F. April 5.

³¹ California Emergency Management Agency. 2009. Tsunami Inundation Map for Emergency Planning: San Mateo Quadrangle. June 15.

³² Federal Emergency Management Agency (FEMA). 2019. Flood Map Number 06081C0153F. April 5.

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

No impact. The City of Burlingame does not utilize significant groundwater supply or participate in management of the Westside Groundwater Basin.³³ Therefore, the proposed project would not conflict with or obstruct the South Westside Basin Groundwater Management Plan, which also implements the San Francisco Bay Basin Water Quality Control Plan.

(e) Criterion Section 15332(e): Utilities and Public Services

The site can be adequately served by all required utilities and public services.

The project site is in an urban location already served by all supporting municipal utilities (stormwater, water, wastewater, and solid waste) and public services (police, fire, and schools). The following analysis reviews whether the proposed project, as required by CEQA Guidelines Section 15332(e), can be “adequately served by all required utilities and public services.”

2.1.1 - Stormwater

Under existing conditions, the MS4 conveys stormwater from the project site. This would remain the same under the proposed project. The proposed project would increase impervious surface area by 904 square feet. Therefore, a minimal increase in contributions to the MS4 would result, and the existing stormwater conveyance system would be adequate to accommodate the proposed project.

2.1.2 - Water

The project site is served by existing water supplies, treatment facilities, and distribution systems operated and managed by the City of Burlingame Water Division. The City of Burlingame June 2015 Urban Water Management Plan (UWMP) includes projections of potable water demands through the year 2040. The UWMP’s future water demands were calculated using the Demand Management Decision Support System Model provided by Maddaus Water Management, Inc. As indicated in Table 4-1 of the UWMP, the Water District’s multi-family residence accounts used approximately 230 million gallons of potable water in 2015.³⁴ The City of Burlingame UWMP estimates a residential daily per capita water use of 75 gallons per day (gpd).³⁵ Assuming the average Burlingame persons per household of 2.4, on-site population is expected to be approximately 22 persons.^{36,37} Using these amounts, daily water demand would be approximately 1,650 gpd.³⁸

The UWMP includes an evaluation of water demand, conservation, and existing and potential sources of supplies including continued use of San Francisco Public Utilities Commission (SFPUC) water, recycled water, desalination, and water transfers. Near-term demands can be met under normal conditions, but in regional drought years, there could be a supply shortfall of up to 43 million

³³ Erler & Kalinowski, Inc. 2016. 2015 Urban Water Management Plan for the City of Burlingame. June.

³⁴ Ibid.

³⁵ Ibid.

³⁶ State of California, Department of Finance. 2019. E-5 Population and Housing Estimates for Cities, Counties and the State—January 1, 2011–2019. May.

³⁷ Calculation: 2.4 persons/household X 9 units = 21.6 persons

³⁸ Calculation: 75 gallons/capita/day X 22 persons = 1,650 gallons/day

gallons per day (mgd).³⁹ Future demands will be met through continued renewal of the Water District's water service contract for SFPUC water and potentially an expanded recycled water project.⁴⁰

The development assumptions that underlie the UWMP included the growth projections of the ABAG Projections 2013.⁴¹ The General Plan designated the project site for medium/high density residential land use and is currently a residential property.⁴² Therefore, residential water use on-site was previously considered and is in place. Further, the project would implement water conservation strategies as required by Part 11, Title 24 of the California Code of Regulations. Therefore, there are adequate water supplies to serve the proposed project.

2.1.3 - Wastewater

The City of Burlingame Public Works Department's Streets and Sewer Division provides wastewater service to the project site and throughout the City's 4.3-square-mile service area. The Streets and Sewer Division's wastewater infrastructure consists of 81.4 miles of gravity sewers, 31 miles of lower laterals, 6.1 miles of force mains, seven pump stations, and manholes.⁴³ Veolia Water North America operates the City's Wastewater Treatment Facility (WWTF).⁴⁴ The WWTF provides treatment for an average dry weather flow of 200 gpd per unit for multi-family residential uses. Residential peak daily flows shall be a ratio of 1 to 5 for peak to average daily dry weather flow. The WWTF has a maximum permitted capacity of 5.5 mgd and 16 mgd of wet weather flow.⁴⁵

It is expected that the proposed project would result in an increase in wastewater generation compared to existing conditions at the project site, as there would be an increase of six units. However, such an increase would be marginal in comparison to demands from throughout the City, which already has available treatment capacity. The proposed project expects to produce approximately 200 gpd of wastewater per unit, or 1,800 gpd, which is the average dry weather flow for multi-family residential for the City's WWTF. This represents less than 1 percent of the WWTF's maximum permitted capacity. Therefore, there is adequate wastewater treatment capacity to serve the proposed project.

2.1.4 - Solid Waste

Solid waste generated in Burlingame is generally disposed of at the Corinda Los Trancos Landfill, a Class III landfill in the City of Half Moon Bay. The permitted capacity of the landfill is 60.5 million cubic yards (mcy) and its estimated closure date is the year 2034. As of 2015, the remaining capacity was 22.2 mcy.⁴⁶

³⁹ Erler & Kalinowski, Inc. 2016. 2015 Urban Water Management Plan for the City of Burlingame. June.

⁴⁰ Ibid.

⁴¹ Ibid.

⁴² City of Burlingame. 2017. Burlingame General Plan Land Use Plan. July.

⁴³ City of Burlingame. 2018. Sewer System Management Plan. October 15.

⁴⁴ City of Burlingame. 2018. Wastewater Treatment Facility. Website:

https://www.burlingame.org/departments/public_works/waste_water_treatment_plant.php. Accessed August 6, 2019.

⁴⁵ City of Burlingame. 2018. Sewer System Management Plan. October 15.

⁴⁶ California Department of Resources Recycling and Recovery (CalRecycle). 2019. SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Website: <https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002>. Accessed August 12, 2019.

The proposed project's demolition and construction activities would generate solid waste, including debris from demolition of the existing site, improvements, and construction material waste. However, at least 60 percent of proposed project construction and demolition debris would be diverted from landfill disposal by reuse or recycling, in accordance with City Municipal Code. Upon completion of the proposed project, a report is required to verify, with measurement records as proof, the material quantities recycled, reused, salvaged, or otherwise disposed.⁴⁷

Operation of the proposed project would also generate solid waste in quantities typical of other residential uses. Assuming an operational solid waste generation rate of 5.31 lbs per multi-family unit per day, project operation is expected to result in approximately 47.8 lbs of solid waste per day (17,443 lbs, or 8.72 tons, annually). Current solid waste generation could be estimated at 11.4 lbs per single-family unit per day for the existing home, and 8.6 lbs per multi-family dwelling unit per day for the existing duplex. Therefore, existing conditions may be expected to generate 28.6 lbs of solid waste per day.⁴⁸ Though the proposed project would almost double waste generation compared to existing conditions, the proposed project is still relatively small, and adequate solid waste disposal capacity exists at the Corinda Los Trancos Landfill. Consequently, there is sufficient solid waste service for the proposed project.

2.1.5 - Police Services

The proposed project would increase the on-site population over that of current use. Such an increase could result in an increase in reported crimes. Construction plans for the proposed project would be sent to the Burlingame Police Department for review and comment during the initial phase of project review. This review process affords the Burlingame Police Department an opportunity to ensure that site-specific design features (e.g., lighting, landscaping) incorporate Crime Prevention through Environmental Design (CPTED) features to deter criminal acts. Because the proposed project is relatively small, it is not likely it would result in the need for any new physical facilities to maintain acceptable service ratios, response times, or other Burlingame Police Department performance objectives. The nine-unit proposed project would be required to pay \$259 per multi-family unit, or \$2,331, in development impact fees to the Burlingame Police Department.⁴⁹ Therefore, current police services could adequately serve the proposed project.

2.1.6 - Fire Protection Services

The proposed project would increase the on-site population over that of current use. This increase could result in an increase in calls for fire and emergency services. Central County Fire Department (CCFD) closest stations are Station 36 (1399 Rollins Road, Burlingame), approximately 2,165 feet (0.4-mile) northeast of the project site, and Station 35 (2832 Hillside Drive, Burlingame), approximately 4,266 feet (0.8-mile) southwest of the project site. Both stations are capable of providing prompt fire protection service to the project site in an emergency. Mandatory development impact fees paid to the CCFD would offset the proposed project's increase in demand for services. The nine-unit

⁴⁷ City of Burlingame. 2000. Burlingame Municipal Code Chapter 8.17: Recycling and Diversion of Debris from Construction and Demolition.

⁴⁸ California Department of Resources Recycling and Recovery (CalRecycle). 2019. Estimated Solid Waste Generation Rates. Website: <https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates>. Accessed August 13, 2019.

⁴⁹ City of Burlingame. 2019. Master Fee Schedule. July 10.

proposed project would be required to pay \$381 per multi-family unit, or \$3,429, in development impact fees to the CCFD.⁵⁰ In addition, the proposed project would incorporate all contemporary fire prevention features through its mandatory compliance with contemporary building and fire codes. Therefore, existing fire protection services can adequately serve the proposed project.

2.1.7 - Schools

As a residential development, it is possible that the proposed project could house school-age children and therefore generate an increased need for school services. While the proposed project would not result in the need for new physical school facilities due to its small size, it would generate revenue through the payment of development fees to offset the increase in demand for school services. The 11,988-square-foot proposed project would be required to pay developer fees of \$2.09 per square foot of residential space, or approximately \$25,055, to Burlingame School District, and the High School District only portion of School Impact Fees of \$1.39 per square foot of residential space, or approximately \$16,663, to San Mateo Union High School District.^{51,52}

The Developer Fee Justification Study for Burlingame School District provides student generation factors for new housing developments. Using the rates in Table 14, the nine units would generate approximately two transitional kindergarten to Grade 6 level students, and potentially one Grade 7 or Grade 8 level student. San Mateo Union High School District does not provide student generation factors; however, it is assumed that the number of high school students potentially living at the proposed project would also be small given there are only nine units.

Table 14: Student Generation Factors

Grades	Students per Household
TK*–6	0.2067
7–8	0.0525
Note: * TK—Transitional Kindergarten Source: SchoolWorks, Inc. 2016. Level 1—Developer Fee Justification Study for Burlingame School District. May.	

Lincoln Elementary School, Burlingame Intermediate School, and Burlingame High School would serve the project site. Table 15 describes school enrollment and capacity.

⁵⁰ City of Burlingame. 2019. Master Fee Schedule. July 10.

⁵¹ SchoolWorks, Inc. 2016. Level 1—Developer Fee Justification Study for Burlingame School District. May.

⁵² San Mateo Union High School District. School Impact (Developer) Fees. Website: <https://www.smuhsd.org/Page/5186>. Accessed August 15, 2019.

Table 15: School Enrollment

School	2018–2019 Enrollment	Capacity
Lincoln Elementary	457	500
Burlingame Intermediate	1,081	1,255
Burlingame High	1,492	1,700
<p>Sources: California Department of Education. 2019. DataQuest. Website: https://dq.cde.ca.gov/dataquest/. Accessed August 16, 2019.</p> <p>LPA, Inc. 2016. Facilities Master Plan: Burlingame School District. June.</p> <p>San Mateo Union High School District. 2010. Surplus Property Advisory Committee Final Report on Findings and Recommendations. May 13.</p>		

As shown in Table 15, the elementary and intermediate schools that would serve the project site are nearing capacity. However, the proposed project’s potential student generation would be insignificant. Through payment of developer fees, the proposed project would be adequately served by school services.

2.1.8 - Parks

As a residential development, the proposed project would house residents that may use area parks. Land dedication or payment of in-lieu fees is a COA of residential subdivisions. The nine-unit proposed project would be required to pay \$350 per multi-family unit, or \$3,150 in development impact fees to the Parks and Recreation Department.⁵³ The proposed project includes an approximately 905-square-foot common open space area for residents’ use. A total of 2,919 square feet of open space would be provided throughout the site via common space, private patios, and roof terraces. The provided open spaces meet or exceed the City’s requirements for dimension and size per dwelling unit for condominiums.⁵⁴

The nearest local public park to the project site is Ray Park, located approximately 658 feet (0.1-mile) to the west. Other local public parks in the vicinity include Village and Laguna Parks. Two regional parks are located on the waterfront in Burlingame: Fisherman’s Park and Robert E. Wooley State Park. Parts of the Golden Gate National Recreation Area lie just outside the City west of Interstate 280 (I-280), and Coyote Point Recreation Area, a San Mateo County Park, is east of the City in San Mateo. These parks would be available to proposed project residents; however, any increase in park use would be nominal. Therefore, the proposed project would be adequately served by park services.

2.2 - Exceptions to Categorical Exemptions

In addition to investigating the applicability of CEQA Guidelines Section 15332 (Class 32), this technical report also assesses whether any of the exceptions to qualifying for a Class 32 categorical exemption are present. Note that the list of exceptions analyzed below applies to all categories of

⁵³ City of Burlingame. 2019. Master Fee Schedule. July 10.

⁵⁴ City of Burlingame. Burlingame Municipal Code 26.30.070.e: Landscaping and Open Space Standards.

categorical exemptions, not just the Class 32 evaluated herein. The following analysis compares the criteria of CEQA Guidelines Section 15300.2 with the proposed project.

Criterion 15300.2(a): Location

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

The proposed project is not relying on an exemption under Classes 3, 4, 5, 6, or 11. Therefore, the exception under CEQA Guidelines Section 15300.2(a) does not apply to the proposed project.

Criterion 15300.2(b): Cumulative Impact

- (b) All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

The geographic scope of the potential cumulative environmental effects associated with the proposed project (and other similar successive projects of the same type in the same general location in the area) is limited to the project site, its surrounding area, or a broader area depending on the topic. For example, the geographic scope of potential cumulative air quality impacts would be the San Francisco Bay Area Air Basin, whereas the geographic scope of potential cumulative biological resource impacts would be limited to the project site and its immediate surrounding area. Because of the proposed project's small size (9 residential units), its contribution to any potentially cumulative impacts would be small. Furthermore, as indicated throughout this document, the proposed project would not result in any significant impacts, and therefore would not have the potential to significantly contribute to cumulative impacts.

The Trip Generation Analysis and Site Review Memorandum prepared for the proposed project, included as Appendix A, analyzes the potential transportation impacts associated with the proposed project and concludes that impacts would be less than significant. The area surrounding the project site is primarily built out; any potential cumulative effects associated with the proposed project would be similar to those identified in the General Plan. Furthermore, as discussed previously, proposed project related traffic would not significantly contribute to the existing area and conditions. Because impacts under existing conditions would be less than significant, the proposed project traffic would not contribute significantly to any potential cumulative traffic impacts.

Concerning potential cumulative air quality effects, additional analysis (beyond that accomplished in the preceding pages) is not necessary. In developing thresholds of significance, the BAAQMD considered the levels at which individual impacts would be cumulatively considerable. As described previously, the proposed project would result in a less than significant impact relative to air quality impacts and, therefore would not contribute to cumulative air quality impacts.

Therefore, given the above facts, the exception under CEQA Guidelines Section 15300.2(b) does not apply to the proposed project.

Criterion 15300.2(c): Significant Effect

- (c) A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

There are no known unusual circumstances related to site conditions or the type of project proposed. The project site consists of a developed site in an urban location comparable in context to many other areas of the City of Burlingame. The site does not contain any unique or unusual features, the disturbance of which could result in significant environmental impacts. As discussed throughout this document, implementation of the proposed project and its features would not result in unusual circumstances that could result in significant environmental impacts. Therefore, the exception under CEQA Guidelines Section 15300.2(c) does not apply to the proposed project.

Criterion 15300.2(d): Scenic Highway

- (d) A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

The project site has no rock outcroppings (or similar resources) and is not visible from a State Scenic Highway. I-280 is designated as a State Scenic Highway and is approximately 1.66 miles to southwest of the project site; intervening topography and development precludes visibility of the site from this designated highway. The project site is bordered by the National Register of Historic Places listed Historic Resource *The Howard Ralston Eucalyptus Tree Row*, in the Caltrans El Camino Real right-of-way.

The project site includes trees that would be removed. There are three trees (one dead eucalyptus, one live eucalyptus, and a young elm), all on the Caltrans right-of-way at the proposed project frontage. The elm is part of the historic tree row and will either remain on-site or be replaced by either an Accolade or Patriot elm. The eucalyptuses do not require replacement trees and are recommended for removal by Caltrans. Burlingame Municipal Code Section 11.06.090 requires one tree planting for every 2,000 square feet of lot coverage for condominiums.⁵⁵ The proposed project includes the planting of approximately five trees on-site, thereby meeting City requirements.

Given the above facts, the exception under CEQA Guidelines Section 15300.2(d) does not apply to the proposed project.

⁵⁵ City of Burlingame. Burlingame Municipal Code Section 11.06.090, Tree Requirements and Reforestation.

Criterion 15300.2(e): Hazardous Waste Sites

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

As indicated by the EnviroStor website, the project site is not included on a list of hazardous sites as compiled by the California Department of Toxic Substances Control (DTSC).⁵⁶ As compiled by the State Water Resources Control Board, the project site is not included on a list of open active leaking underground storage tank sites, as indicated by the GeoTracker website, a list of sites identified with waste constituents above hazardous waste levels, or a list of “active” Cease and Desist or Cleanup and Abatement Orders.^{57,58,59} Therefore, the exception under CEQA Guidelines Section 15300.2(e) does not apply to the proposed project.

Criterion 15300.2(f): Historical Resources

- (f) A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

For purposes of Criterion 15300.2(f), historical resources include both built environment and archaeological resources. The project site is developed with a single-story residential duplex, two-story single-family home, paved parking lot, and minimal landscaping. Original construction of these improvements occurred on or about the year 1941. A records search conducted at the Northwest Information Center (NWIC) on August 13, 2019, identified 14 historic and prehistoric resources within a 0.5-mile radius of the proposed project, none of which are located within the proposed project boundaries, or would be adversely affected by the proposed project.

A letter was sent to the Native American Heritage Commission (NAHC) on August 12, 2019, requesting a search of the NAHC Sacred Lands file for recorded Tribal Cultural Resources in proximity to the proposed project. A response was received on August 16, 2019, indicating the results of the search were negative. The letter included contact information for five tribal representatives who may have additional information or interest in the proposed project. Letters containing a project description and location map were sent to all five representatives on August 28, 2019. No responses have been received to date.

The two existing structures on-site were built in 1941, and are consequently over 50 years in age. Buildings and structures over 50 years in age are potentially eligible for inclusion on the California Register of Historical Resources (CRHR), which in turn, would qualify them as significant historic resources under CEQA. Archival research, information obtained from the County Assessor’s office, and a site visit were used to evaluate both structures pursuant to the four eligibility criteria for inclusion on the CRHR. The results of the assessment concluded both buildings are ineligible for

⁵⁶ Department of Toxic Substances Control (DTSC). 2019. EnviroStor. Website: <http://www.envirostor.dtsc.ca.gov/public/>. Accessed August 19, 2019.

⁵⁷ State Water Resources Control Board (State Water Board). 2015. GeoTracker. Website: <https://geotracker.waterboards.ca.gov/>. Accessed January 3, 2020.

⁵⁸ State Water Resources Control Board (State Water Board). Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit.

⁵⁹ State Water Resources Control Board (State Water Board). List of “active” CDO and CAO.

inclusion on the CRHR, and both buildings were photographed and recorded using 523 series Department of Parks and Recreation (DPR) recordation forms.

As such, no local, State, or federal registers of historic resources identify any known resources that will be adversely affected by the proposed project, and the exception under CEQA Guidelines Section 15300.2(f) does not apply to the proposed project. A cultural resources assessment containing the results of the records searches, Native American outreach, and historic assessment of on-site structures can be found in confidential Appendix C.

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