567 Airport Boulevard Project

JUNE
2021

Initial Study/Mitigated Negative Declaration

City of Burlingame

DRAFT

567 AIRPORT BOULEVARD PROJECT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

PREPARED FOR:

City of Burlingame
501 Primrose Road
Burlingame, CA 94010
Contact: Ruben Hurin

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San Francisco, CA 94105
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JUNE 2021

ICF. 2021. *567 Airport Boulevard Project Initial Study/Mitigated Negative Declaration*. Draft. June. (ICF 00640.20.) San Francisco, CA. Prepared for City of Burlingame, Burlingame, CA.

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Acronyms and Abbreviations

AA	Anza Area
AB	Assembly Bill
ABAG	Association of Bay Area Governments
AMSD	approximate minimum search distance
APN	Assessor's Parcel Number
ASTM	American Society for Testing and Materials
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Basin Plan	San Francisco Bay Basin Plan
Bay	San Francisco Bay
Bay Trail	San Francisco Bay Trail
BCDC	San Francisco Bay Conservation and Development Commission
bgs	below ground surface
BMPs	best management practices
BPD	Burlingame Police Department
BSD	Burlingame School District
Burlingame General Plan, General Plan, or 2040 General Plan	Envision Burlingame General Plan
C/CAG	City/County Association of Governments
CAA	Clean Air Act
CAAQS	California ambient air quality standards
Cal/OSHA	California Division of Occupational Safety and Health
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CALINE4	California Line Source Dispersion Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCE	community-choice energy
CCFD	Central County Fire Department
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CH_4	methane
City	City of Burlingame
CMP	Congestion Management Program
CNDDB	California Natural Diversity Database

CNEL	community noise equivalent level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	carbon dioxide equivalent
CREC	controlled recognized environmental condition
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
cy	cubic yard
dB	decibel
dBA	A-weighted decibel
DDT	dichlorodiphenyltrichloroethane
DOT	U.S. Department of Transportation
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources
EIR	environmental impact report
EMFAC	EMission FACtor
EMI	Emissions Inventory Data
EPA	U.S. Environmental Protection Agency
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FINDS	Facility Index System
FTA	Federal Transit Administration's
GHG	greenhouse gas
GIS	Geographic information system
gpd	gallons per day
GWP	global warming potential
HCP	habitat conservation plan
HFC	hydroflourocarbon
HRA	health risk assessment
HREC	historical recognized environmental condition
HVAC	heating, ventilation, and air-conditioning
I	Interstate
in/sec	inch per second
IPaC	Information for Planning and Consultation
IPCC	Intergovernmental Panel on Climate Change

JPA	Joint Powers Authority
kW	kilowatt
LEED	Leadership in Energy and Environmental Design
L_{eq}	equivalent sound level
LID	low-impact development
LOS	level of service
mg/m_3	milligrams per cubic meter
mgd	million gallons per day
MRP	Municipal Regional Permit
MRZ	Mineral Resource Zone
MTC	Metropolitan Transportation Commission
Mw	maximum magnitude
N_2O	nitrous oxide
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NCCP	natural community conservation plan
NO_2	nitrogen dioxide
NOP	Notice of Preparation
NO_X	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NWIC	Northwest Information Center
O_3	ozone
OEHHA	Office of Environmental Health Hazard Assessment
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PCE	Peninsula Clean Energy
PG&E	Pacific Gas and Electric Company
Phase I ESA	Phase I Environmental Site Assessment
PM_{10}	particulate matter no more than 10 microns in diameter
$PM_{2.5}$	particulate matter no more than 2.5 microns in diameter
ppm	parts per million
PPV	peak particle velocity
Project	567 Airport Boulevard Project
Project site	567 Airport Boulevard
R&D	research and development
RCRA	Resource Conservation and Recovery Act of 1976
REC	recognized environmental condition
ROGs	reactive organic gases
RTPs	regional transportation plans

RWQCB	Regional Water Quality Control Board
RWS	Regional Water System
SamTrans	San Mateo County Transit District
San Mateo County BI	San Mateo County Business Inventory
SB	Senate Bill
SCSs	sustainable communities strategies
sf	square feet
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SIP	State Implementation Plan
SLF	Sacred Land File
SMCWPPP	San Mateo Countywide Pollution Prevention Program
SMUHSD	San Mateo Union High School District
SO_2	sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
TACs	toxic air contaminants
TDM	transportation demand management
TIA	transportation impact analysis
USFWS	U.S. Fish and Wildlife Service
UST	underground storage tank
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
WWTP	wastewater treatment plant
$\mu g/m^3$	micrograms per cubic meter

Chapter 1
Background

1. **Project Title:**

   567 Airport Boulevard Project

2. **Lead Agency Name and Address:**

   City of Burlingame
   501 Primrose Road
   Burlingame, CA 94010

3. **Contact Person and Phone Number:**

   Ruben Hurin, Planning Manager
   650.558.7256

4. **Project Location:**

   567 Airport Boulevard
   Burlingame, CA 94010

5. **San Mateo County Assessor's Parcel Number (APN):**

   APN 026-363-590 (555 and 577 Airport Boulevard)
   APN 025-290-470 (leased State Lands Commission parcel)

6. **Project Sponsor's Name and Address:**

   EW-PG Airport Owner, LLC
   1099 18th Street, Suite 2900
   Denver, CO 80202

7. **General Plan Designation:**

   Bayfront Commercial

8. **Zoning:**

   Anza Area (AA)

9. **Description of Project:**

   Please refer to Chapter 2, *Project Description*.

10. **Surrounding Land Uses and Setting:**

    The 12.8-acre (558,962-square-foot) site for the 567 Airport Boulevard Project (Project) is in the northeast portion of the city of Burlingame, between US 101 and San Francisco Bay. The Project site is in an urbanized area at the south end of the Burlingame Bayfront area. The northwest property line follows Airport Boulevard, which borders three adjacent office developments (411 Airport Boulevard, 433 Airport Boulevard, and 533 Airport Boulevard). The Anza parking lot (615 Airport Boulevard) is west of the Project site. Sanchez Channel,

Burlingame Lagoon, the San Francisco Bay Conservation and Development Commission Shoreline Band, and the Bay Trail are on the east and south sides of the Project site; these are the public frontages on the Project site. San Francisco Bay is farther to the north.

11. **Other Public Agencies Whose Approval May Be Required (e.g., permits, financing approval, participation agreement), Potential Responsible Agencies, and Trustee Agencies:**

    The following approvals may be required for the Project:

    - Central County Fire Department – Request for alternate means of fire department access.
    - Bay Area Air Quality Management District – Permits for onsite generators, boilers, and other utility equipment.
    - California Regional Water Quality Control Board/San Mateo Countywide Water Pollution Prevention Program – Approval of National Pollutant Discharge Elimination System permit for stormwater discharges.
    - San Mateo County Transportation Authority – Review of potential effects on public transit.
    - San Mateo County Environmental Health Division – Review of food service functions and onsite generators.
    - Native American Heritage Commission – Identification of areas of concern within the vicinity of the Project site or resources that may be listed in the commission's Sacred Land File.
    - San Francisco Bay Conservation and Development Commission – Permit for work within 100 feet of the San Francisco Bay shoreline.
    - Federal Aviation Administration – Determination of "No Hazard to Air Navigation" for 24 Aeronautical Study Numbers.
    - City/County Association of Governments of San Mateo County, Airport Land Use Committee – Review of Project construction within the vicinity of an airport.

12. **Have California Native American tribes that are traditionally and culturally affiliated with the Project area requested consultation, pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?**

    To identify tribal cultural resources within the Project area, the Native American Heritage Commission (NAHC) was contacted on January 27, 2021, and asked to provide a list of California Native American tribes that are geographically affiliated with the Project site. A search of the NAHC's Sacred Lands File was also requested. On February 8, 2021, the NAHC responded with a list of eight individuals for consultation; the search of the Sacred Lands File was negative.

    On February 23, 2021, letters with Project details and a location map were sent by email to the eight Native American contacts. The letters explicitly stated that they represented formal notification of a proposed project, as required under CEQA—specifically, Public Resources Code Section 21080.3.1 and Chapter 532 of the Statutes of 2014 (Assembly Bill 52). Follow-up phone calls were conducted on April 7, 2021.

    Please refer to Section V, Cultural Resources, and Section XVIII, Tribal Cultural Resources, for more details.

Chapter 2
Project Description

The Project Sponsor, EW-PG Airport Owner, LLC, for the 567 Airport Boulevard Project (Project) is proposing development of 12.8 acres of land in the Bayfront area of Burlingame. The parcel at 567 Airport Boulevard (Project site) is currently developed with an office park (known as Bay Park Plaza). Bay Park Plaza includes one five-story office building and one eight-story office building, with a total area of 259,733 square feet (sf), and a surface parking lot with 879 spaces. The Project would include construction of an eight-story, 241,679 sf office/research-and-development (R&D) building and a 5.5-level parking structure on the site of an existing surface parking lot. Bay Park Plaza's existing buildings would remain; therefore, the total building area on the Project site would increase to 501,412 sf. The new parking structure, as well as surface parking lots, would provide 1,520 parking spaces for the new and existing buildings. The Project would also provide new landscaped areas, including promenades, outdoor seating areas, walkways, patios, look-outs, plazas, and stormwater treatment areas. The 100-foot San Francisco Bay Conservation and Development Commission (BCDC) Shoreline Band and the Bay Trail are located at the Project site, along Sanchez Channel to the east and Burlingame Lagoon to the south.

Existing Conditions

Project Location

As shown in Figure 1, the 12.8-acre (558,962 sf) Project site is in the northeastern portion of the city of Burlingame, between US 101 and San Francisco Bay (Bay). The Project site is in a developed and urbanized area at the south end of the Bayfront area in Burlingame. The northwest property line follows Airport Boulevard, which borders three adjacent office developments (411 Airport Boulevard, 433 Airport Boulevard, and 533 Airport Boulevard). The Anza parking lot (615 Airport Boulevard) is west of the Project site. Sanchez Channel, Burlingame Lagoon, the BCDC Shoreline Band,[1] and the Bay Trail are on the east and south sides of the Project site; these are the public frontages on the Project site. San Francisco Bay is farther to the north.

Regional access to the Project site is provided by US 101 via the Broadway, Anza Boulevard, and Peninsula Avenue exits. Commute.org operates a shuttle service from the Millbrae Bay Area Rapid Transit (BART)/Caltrain station to the Bayfront area, with a shuttle stop directly across from the Project site. Airport Boulevard also includes bicycle lanes.

Project Site

The Project site at Bay Park Plaza includes assessor's parcel numbers (APNs) 026-363-590 (555 and 577 Airport Boulevard) and 025-290-470 (the leased State Lands Commission parcel). Bay Park Plaza consists of two multi-tenant office buildings with a total of 259,733 sf. The five-story (69-foot-tall), 120,579 sf

[1] The Shoreline Band is the land extending inland for 100 feet from the shoreline of the Bay, which is within the jurisdiction of BCDC.

building at 555 Airport Boulevard was constructed in 1998. The eight-story (90-foot-tall), 139,154 sf building at 577 Airport Boulevard was constructed in 1983. The Project site currently provides space for approximately 864 employees at the two existing buildings.

The Project site also includes surface parking lots with 879 spaces, including 15 spaces dedicated to the BCDC and Bay Trail. Along the shoreline of the Project site are trails, seating nodes, mature trees, and vegetation. At the southeast corner of the Project site is a large, triangular publicly accessible open space with a plaza, lawns, and seating areas.

Because of their heights and proximity to the shoreline, buildings at 555 Airport Boulevard and 577 Airport Boulevard are highly visible from US 101 and Burlingame Lagoon. The building at 555 Airport Boulevard has curved, bluish-green reflective glass on the north side that transitions to a façade with punched window openings encased in pre-cast concrete pilasters and spandrels. The two ends of the building are stepped down one floor. The building at 577 Airport Boulevard is wrapped in dark glazing, with pre-cast concrete bands throughout the façade. Both buildings have a general off-white tone.

The Project site is relatively flat, with grades between 4 and 12 feet (relative to NAVD 88 datum). The site slopes gently to a low-lying area at the midpoint of the property line, which is shared with other low-lying properties along Airport Boulevard to the northwest. The Project site conforms to the elevations of the shoreline protection to the east at Sanchez Channel and south at Burlingame Lagoon.

Project Characteristics

Land Use and Zoning

The Project site is zoned Anza Area (AA), which allows office uses, including R&D and associated laboratory uses and instructional activities. Building heights of up to 65 feet are permitted. Offices with a maximum floor area ratio (FAR) greater than 0.6, including R&D developments with associated laboratory uses, require a Conditional Use Permit.

Overall, the Project would be consistent with the requirements for development in the AA zoning district. The Envision Burlingame General Plan (General Plan or 2040 General Plan) states that "the Bayfront will be a regional recreation and business destination." The Project would support Goal CC-6.3 (Infill Development) of the plan by encouraging increased intensities through high-quality infill development on surface parking lots and the conversion of surface parking lots into active commercial and hospitality uses.

The Project would increase the intensity of an existing office use. A new office/R&D building (and associated parking structure) would be added at the site of a surface parking lot on the existing two-building office campus. The Project would be consistent with required uses for the AA zoning district. However, the Project would increase the FAR from 0.46 to 0.9 and thus would require a Conditional Use Permit. In addition, the Project would require a Conditional Use Permit for the proposed height. The AA zoning district allows a height of 65 feet; the Project would have a maximum of 133 feet. However, the Project would be consistent with all other zoning regulations, including those pertaining to use, setbacks, parking, view corridors, lot coverage, lot frontage, minimum lot size, landscaping, and trash and loading docks.

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Figure 1
Project Location

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Proposed Development

The Project would subdivide APN 026-363-590 to create two parcels. Parcel A would include the existing 555 Airport Boulevard building, the new office/R&D building (567 Airport Boulevard), the new parking structure (565 Airport Boulevard), and a portion of the remaining site, including landscape improvements and surface parking. Parcel B would encompass the existing 577 Airport Boulevard building and portions of the remaining site and surface parking. Parcel A would reserve the right to create two commercial condominiums for the 555 and 567 Airport Boulevard buildings. Table 2-1 summarizes the Project features, and Figure 2 depicts the proposed site plan.

Table 2-1. Existing Conditions Compared to Project Features

	Existing	Proposed
Buildings		
Building Area		
577 Airport Boulevard	139,154 sf	139,154 sf
555 Airport Boulevard	120,579 sf	120,579 sf
567 Airport Boulevard	—	241,679 sf
Total Building Area	*259,733 sf*	*501,412 sf*
FAR	0.46	0.9
Maximum Building Heights	90 feet	133 feet
Parking		
Surface Parking	879 stalls	376 stalls
Parking Structure	—	1,144 stalls
Total Parking Stalls	*879 stalls*	*1,520 stalls*

Source: DES Architects/EverWest, 2021.

The Project would add a 241,679 sf, eight-story office/R&D building and a 5.5-level parking structure to the existing campus. In total, the building area at the Project site would increase to 501,412 sf, with the FAR increasing from 0.46 to 0.9. The new parking structure and surface parking lots would provide 1,520 spaces for new and existing buildings, at a ratio of three spaces per 1,000 sf. The General Plan Environmental Impact Report assumes one employee per 275 sf of office space, which equates to 880 employees for the Project's 241,679 sf of new office space.[2]

As shown in Figure 3, access to the proposed office/R&D building, the proposed parking structure, and the existing buildings would be from two existing driveways on Airport Boulevard that currently provide access to both 555 Airport Boulevard and 577 Airport Boulevard. Internal drive aisles would connect the driveways and provide direct access to the parking structure and surface parking. The interior circulation roads would include surface parking as well. Most driveways and interior circulation roads would be 26 feet wide; some would be as wide as 29 feet, not including surface parking spaces. Loading zones for freight and trash would serve all buildings and have suitable turning and parking dimensions.

[2] In general, R&D uses have a lower occupancy rate than office uses. However, because the future tenants are unknown at this time, for conservative purposes, this analysis assumes the generation rate for office uses.

Pedestrian access would be provided from internal sidewalks that would connect to existing sidewalks on Airport Boulevard as well as the Bay Trail Class I path that runs along the southern and eastern boundaries of the Project site. Bicycle access to the Project site would be provided by the existing Class II bicycle lanes along Airport Boulevard.

Office/R&D Building

The proposed office/R&D building would be sited on an existing parking lot between two existing buildings, roughly 70 feet from each of the existing buildings. The eight-story building would have an area of 241,679 sf, with each level ranging from 27,199 sf to 31,979 sf. The proposed building floor plans are shown in Figure 4. The proposed office/R&D building would be 133 feet tall (measured to the top of the parapet) and set back 142 feet from the Burlingame Lagoon shoreline. This setback would accommodate an open space area on the south side of the building, with views to Burlingame Lagoon. The top two floors at the building's east end would be setback 25 feet to create a rooftop terrace of approximately 2,500 sf that would be shaded with a metal trellis and canopy. There would also be an 800 sf rooftop terrace on the building's west end. The rooftop patios would provide amenities for building tenants and have glass railings for protection. The building's primary entrance would be on the north side, facing the main campus driveway and Airport Boulevard. The trash enclosure and truck parking space would be screened by new landscaping as well as existing trees along the shoreline. A smaller trash enclosure would be built on the east side of the 555 Airport Boulevard building. The loading and delivery area would be set back 75 feet from the rear property line and located outside the 100-foot BCDC Shoreline Band.

Parking Structure and Surface Parking

The proposed parking structure would have a ground level plus 4.5 levels above, with a building footprint of 65,800 sf and a total building area of 317,042 sf. The parking structure would be behind the existing buildings and the off-site parking deck to the northwest, approximately 73 feet from the new office/R&D building. The top parking level would be set back another 60 feet. The parking structure would be accessible from two access points at the main campus driveway. Accessible parking spaces and electrical-vehicle chargers would be provided in the parking structure. The parking structure floor plans are shown in Figures 5 and 6.

The AA zoning district requires the Project to provide approximately 1,687 parking spaces. However, with implementation of the transportation demand management (TDM) program (see below), the Project would be entitled to a 10 percent reduction in the number of parking spaces required (i.e., 1,520 parking spaces). Therefore, approximately 376 spaces would be provided in the surface parking lots surrounding the buildings and 1,144 spaces would be provided in the parking structure, for a total of 1,520 spaces. Of these, 15 surface parking spaces along the east and south sides of the Project site would continue to be dedicated to the BCDC Shoreline Band and Bay Trail. In addition, approximately 59 spaces would be dedicated to clean-air, vanpool, and electric vehicles. Finally, 41 short-term and long-term bicycle parking spaces would be provided throughout the Project site.

Landscaping and Open Space

The Project site currently contains 303 trees. Construction of the Project would retain 148 existing trees and add 251 new trees. Of the existing trees to be removed, 17 are considered "protected," per the City of Burlingame (City). In addition, approximately 1.44 acres of existing vegetation would be removed, and 2.11 acres of new vegetation would be planted. The outdoor landscaping program

Source: DES Architects/EverWest, 2020.

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Figure 2
Proposed Site Plan

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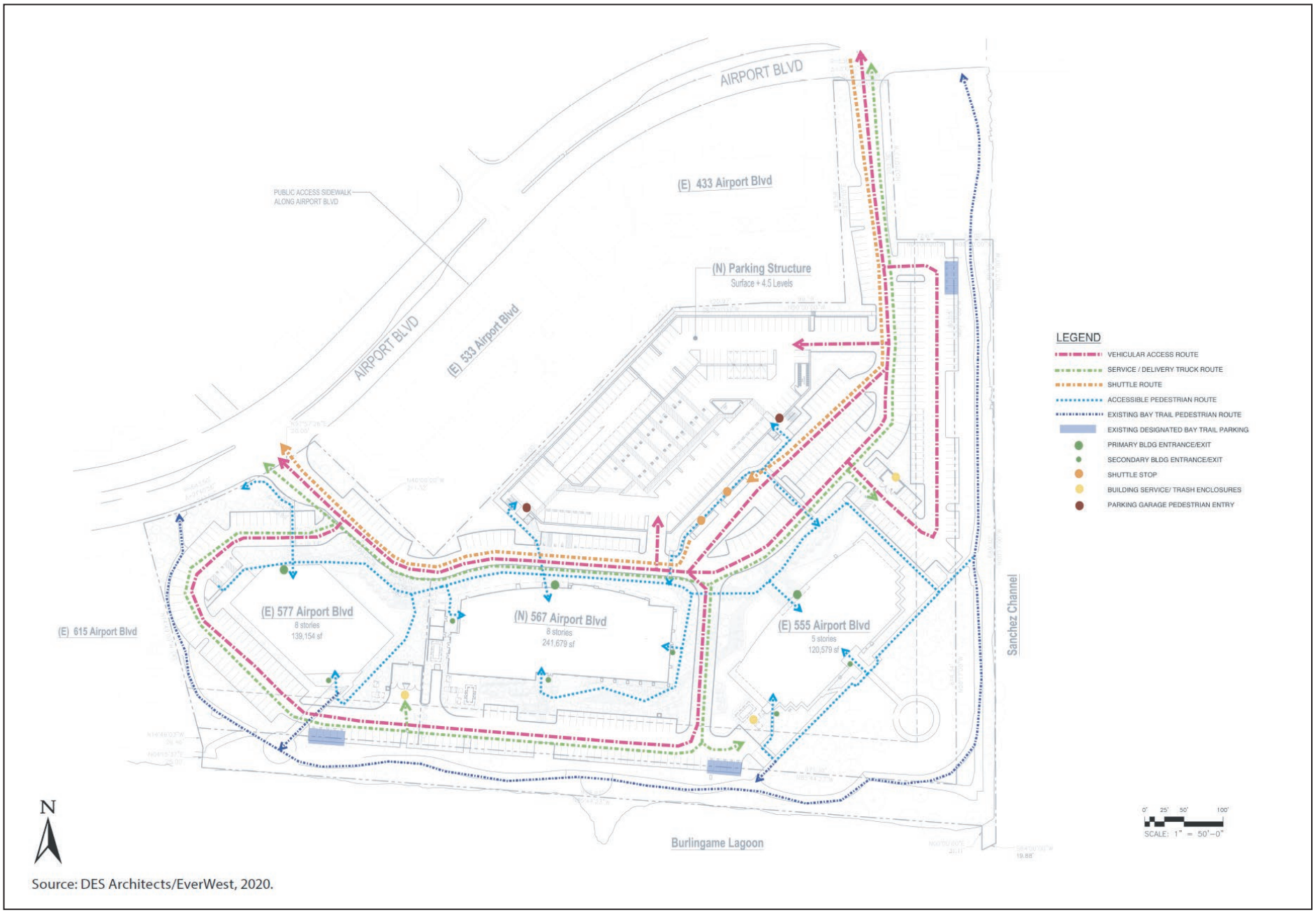

Source: DES Architects/EverWest, 2020.

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Figure 3
Proposed Site Circulation and Access

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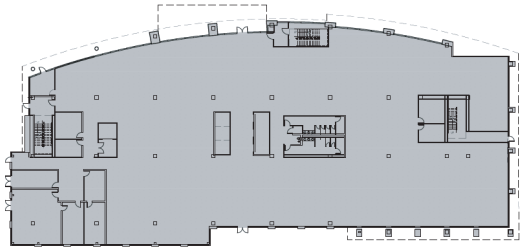
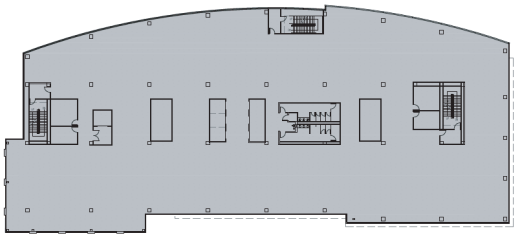
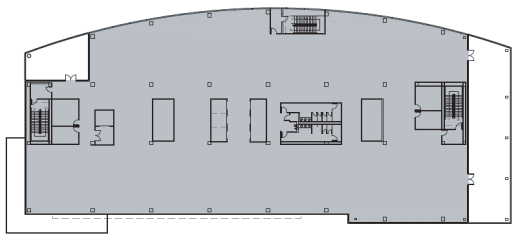


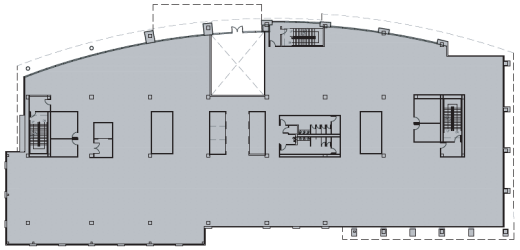
FIRST FLOOR - 30,449 sf



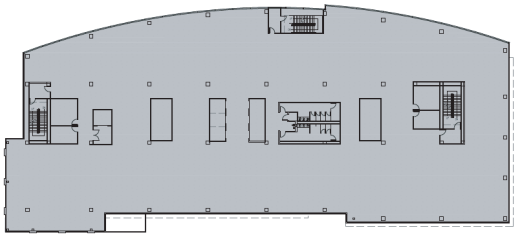
FOURTH FLOOR - 31,979 sf



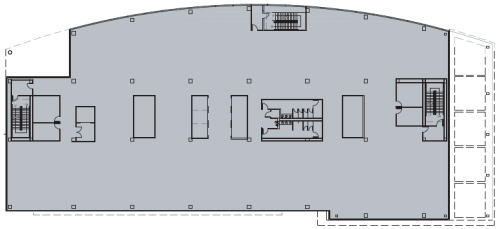
SEVENTH FLOOR - 27,199 sf



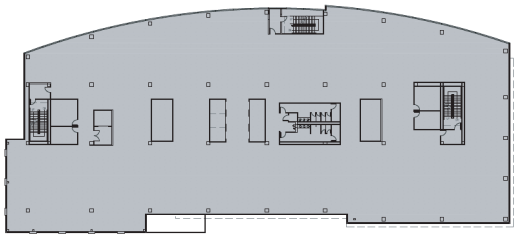
SECOND FLOOR - 29,380 sf



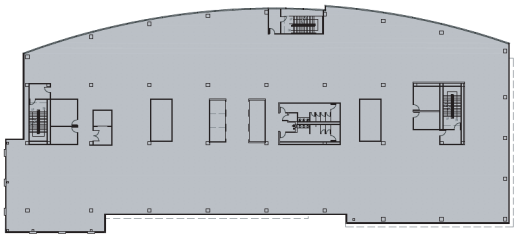
FIFTH FLOOR - 31,747 sf



EIGTH FLOOR - 27,199 sf



THIRD FLOOR - 31,979 sf



SIXTH FLOOR - 31,747 sf

PLANNING SUBMITTAL AREA

First Floor	30,449 sf
Second Floor	29,380 sf
Third Floor	31,979 sf
Fourth Floor	31,979 sf
Fifth Floor	31,747 sf
Sixth Floor	31,747 sf
Seventh Floor	27,199 sf
Eigth Floor	27,199 sf
Total Gross Area	**241,679 sf**

Source: DES Architects/EverWest, 2020.

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Figure 4
Proposed Building Floor Plans

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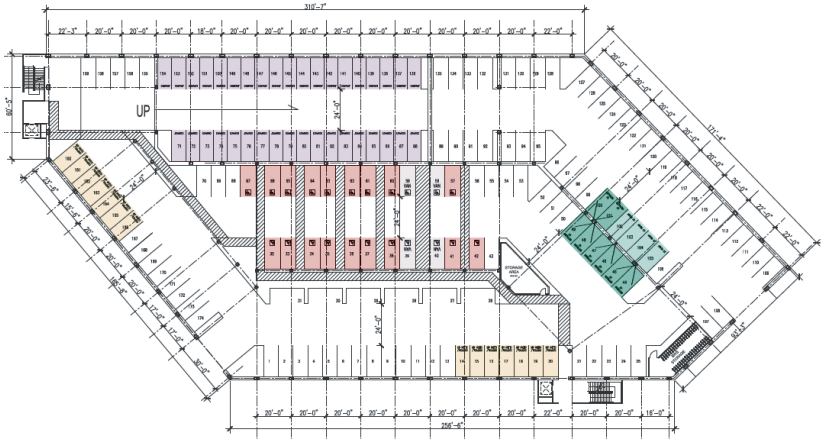
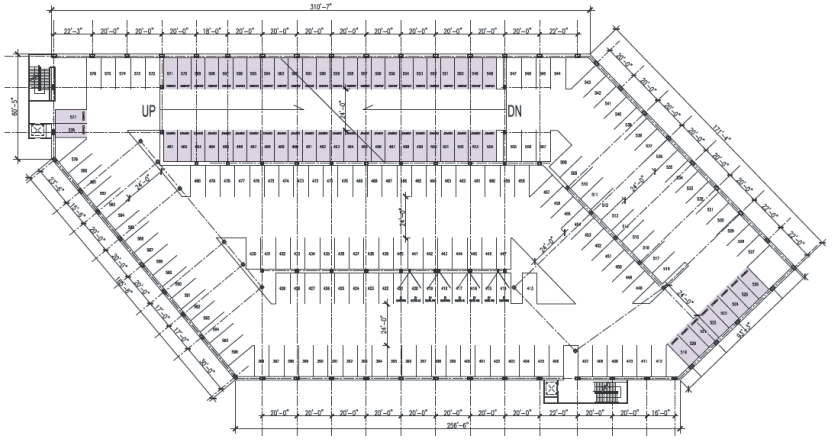
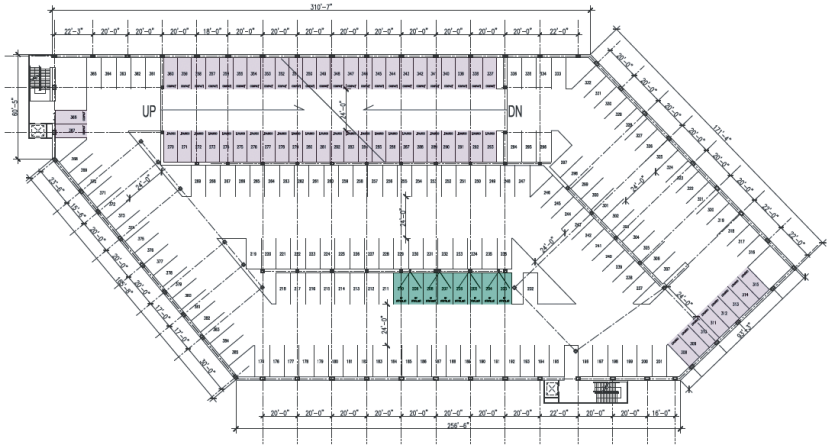


1 Parking Structure Floor Plan - Surface Level
1/32"=1'-0"



3 Parking Structure Floor Plan - Level 3
1/32"=1'-0"



2 Parking Structure Floor Plan - Level 2
1/32"=1'-0"

PARKING STALL TYPES

- ADA STALL (9' X 18')
- ADA VAN STALL (9' X 18')
- VANPOOL / CLEAN AIR STALL
- EV INSTALLED STALL
- EV READY STALL
- COMPACT STALL (8' X 17')
- STANDARD STALL (8.5' X 18')

0' 16' 32' 64'
SCALE: 1/32" = 1'-0"

Source: DES Architects/EverWest, 2020.

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Figure 5
Parking Structure Floor Plan: Levels 1-3

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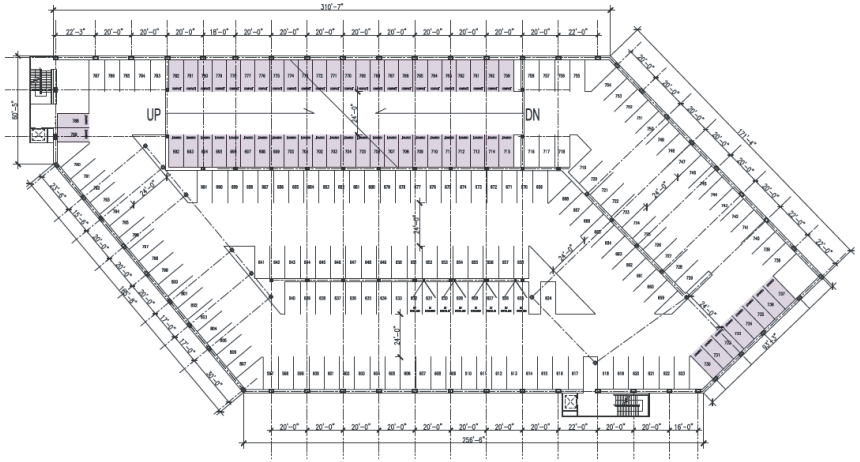
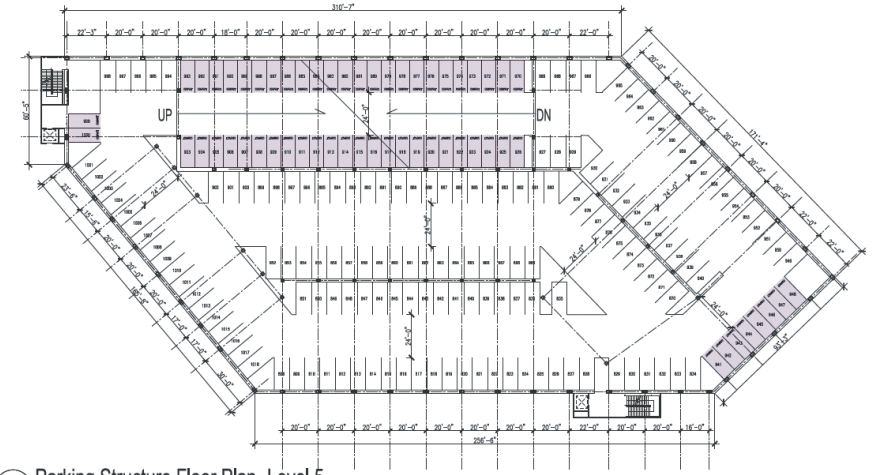
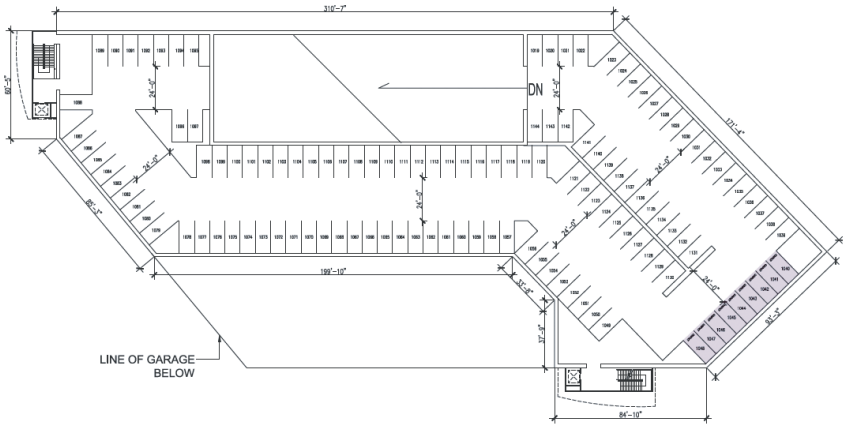


1 Parking Structure Floor Plan - Level 4
1/32"=1'-0"



2 Parking Structure Floor Plan -Level 5
1/32"=1'-0"



3 Parking Structure Floor Plan - Level 5.5
1/32"=1'-0"

PARKING STALL TYPES

- ADA STALL (9' X 18')
- ADA VAN STALL (9' X 18')
- VANPOOL / CLEAN AIR STALL
- EV INSTALLED STALL
- EV READY STALL
- COMPACT STALL (8' X 17')
- STANDARD STALL (8.5' X 18')

0' 16' 32' 64'
SCALE: 1/32" = 1'-0"

Source: DES Architects/EverWest, 2020.

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Figure 6
Parking Structure Floor Plan: Levels 4-5.5

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would incorporate "flex" amenity spaces adjacent to each building and tie the landscape together with appropriate plant materials, hardscape geometry, and paving materials. The plant palette would be derived from a combination of drought-tolerant native and adaptive plants. All plant species would be selected in accordance with the City's Water Conservation in Landscape Ordinance (Ordinance 1845, Chapter 18.17 of the Burlingame Municipal Code). Vegetation would be located on the Project site so as to maximize microclimate factors such as sun exposure, shade, and wind. In addition, bioretention areas would be provided that would fit within the landscape design. Site lighting would complement the geometry of the landscape design as well as the materials used in the architectural design of the new building.

A new open space is proposed for the southern exposure adjacent to the new office/R&D building, providing opportunities for outdoor amenities. The open space would include an overlook with views of Burlingame Lagoon and the Santa Cruz Mountains and provide a variety of seating areas, dining opportunities, and lawn games. Existing open spaces at the Project site would be retained under the Project. The Project would maintain public access to the BCDC Shoreline Band during and after construction as well as the Bay Trail and 15 dedicated parking spaces. The Bay Trail, vegetation, and amenities within the BCDC Shoreline Band would not be altered.

Building Design

The new office/R&D building and parking structure would use high-performance glazing, low-carbon concrete, metal sunshades and fins, and other structural materials and finishes to provide optimal building efficiency. Mechanical and electrical systems as well as lighting controls would be highly efficient (e.g., LED light fixtures, occupancy sensors, electrical generator). The Project would comply with the latest California Green Building Standards Code (CALGreen) and target Leadership in Energy and Environmental Design (LEED) certification rating of Silver. The application for the Project was submitted prior to the City adopting its "Reach Code." Therefore, the Project is not required to meet Reach Code standards.

The building elevations for the office/R&D building and parking structure are shown in Figures 7 and 8, respectively.

Transportation Demand Management Plan

The Project would include a comprehensive TDM Plan,[3] the purpose of which would be to reduce the number of drive-alone trips generated by the Project by shifting a portion of those trips to more sustainable modes (e.g., walking, biking, carpooling, using transit). Implementation of such a plan is envisioned to alleviate some traffic congestion, reduce greenhouse gas emissions and other air pollution, and reduce the demand for parking. The goal of the TDM Plan is to reduce the number of trips by 20 percent, consistent with the City's Climate Action Plan.

The Project, as proposed, includes supportive TDM infrastructure as well as measures such as tenant access to public transportation, pedestrian amenities, bicycle parking, and shower facilities. In addition, because the Project may be occupied by one or more tenants, the Project Sponsor would require tenants, by lease agreement, to actively incorporate and participate in suitable TDM measures to achieve the purpose of the TDM Plan. The following measures could be included in the lease agreements with future tenants:

[3] Krupka Consulting. 2020. *Draft Final TDM Plan Burlingame Bay.* Prepared for EW-PG Airport Owner, LLC. November 6.

- **TDM Coordinator:** A Project TDM coordinator shall be responsible for implementing, maintaining, and monitoring the TDM Plan.
- **Employee Survey:** A confidential survey of the transportation characteristics of employees shall be conducted, with findings submitted to the City upon full occupancy of the Project and periodically thereafter.
- **Commute Alternative Information:** A summary pamphlet shall be prepared that describes alternatives to driving alone and summarizes the TDM Plan.
- **Community Alternative Plan:** The Project shall implement TDM measures consistent with the City's TDM policy and goals and comply with the City/County Association of Governments of San Mateo County Land Use Guidelines. Specific measures to be included in the plan shall include dedicated peak-period shuttle service to/from BART and Caltrain facilities and subsidized transit passes for at least 25 percent of employees. Other TDM measures could include alternative work schedules/telecommuting, a guaranteed emergency ride-home program, a bicycle and walking "buddy" program, trip planning, bicycle parking, preferential parking spaces, and a catalog of available transportation services, bicycle routes, bike-share facilities, and transit/shuttle services.

Utilities

Onsite utilities would served by energy (gas and electric), domestic water, wastewater, and storm drain facilities. All onsite utilities would be designed in accordance with applicable codes and current engineering practices. The Project would meet the latest CALGreen and City Reach Code requirements, as applicable to the Project. The Project would also target at least a LEED rating of Silver. Existing Pacific Gas and Electric Company electric and gas lines in the vicinity of the Project site would continue to serve the site.

The Burlingame Public Works Department provides water and wastewater service at the Project site. New water services would be connected to an existing 12-inch municipal water main located south of the Project site, along Burlingame Lagoon. It is anticipated that operation of the Project would require 24,762 gallons of water per day. Existing sewers would be rerouted as required, and new sewer services would be extended to the proposed office/R&D building and parking structure. Existing sewer connections to the 10-inch municipal sewer in Airport Boulevard would continue to be used.

The Project site currently consists of approximately 2.12 acres of pervious surfaces and 8.72 acres of impervious surfaces.[4] Implementation of the Project would not change the amount of impervious surface cover and, therefore, would not increase runoff from the site. The existing storm drain pump station, connected to Burlingame Lagoon, would continue to be used. In addition, a treatment pump station would be added to direct runoff to treatment planters throughout the Project site.

As an infill development that would replace or alter more than 50 percent of existing impervious surfaces at the site, the Project would be required to provide treatment measures for all impervious surfaces (e.g., on-grade flow-through planters). Flows from the parking structure and the remainder of the site would be treated with the use of treatment planters. In addition, a new pump station would direct runoff. The size of the planters would be based on local requirements but preliminarily sized at 4 percent of the impervious surface from the site plan. Final sizing would be documented in the Stormwater Management Plan to be submitted with the construction documents for the Project.

[4] BKF. 2020. *Burlingame Bay – Hydrology Analysis Memorandum.* BKF No. C20191138-10. April 3.

EAST ELEVATION

NORTH ELEVATION

WEST ELEVATION

SOUTH ELEVATION

Source: DES Architects/EverWest, 2020.

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ICF

Figure 7
Office Building Elevations

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NORTH ELEVATION

EAST ELEVATION

SOUTH ELEVATION

WEST ELEVATION

Source: DES Architects/EverWest, 2020.

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Figure 8
Parking Structure Elevations

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Project Construction

The proposed construction methods, which are considered conceptual at this time, would be subject to review and approval by the City. For purposes of this environmental document, the analysis considers the construction plan described below.

Construction Schedule and Phasing

Project construction is expected to start in January 2022, with projected occupancy to occur in March 2024 (subject to the entitlements timeline, plan check timeline, and final construction schedule). The Project would be constructed in a single phase, consisting of the following six subphases: demolition and site clearing, foundations and slab on grade, superstructure, building skin, interior core buildout, and landscape and site finishes.

Construction would occur 6 to 7 days per week. Standard construction work hours would be 7:00 a.m. to 5:00 p.m. Monday through Friday and 9:00 a.m. to 5:00 p.m. on Saturdays. Construction hours in the City public right-of-way would be limited to weekdays and non-City holidays between 8:00 a.m. and 5:00 p.m. If nighttime or after-hours work is required, local approvals and permits would be obtained prior to the start of construction. Examples of activities that may occur outside of normal working hours are material deliveries and concrete pours. The size of the construction workforce would vary during the different subphases of construction. The maximum number of workers required for construction would be approximately 300 per day. The maximum average number of construction workers would be required during the superstructure subphase (i.e., approximately 125 workers).

Site Grading

The Project site is located largely in Federal Emergency Management Agency Flood Hazard Area AE, which has a base flood elevation of 10.0 feet. The existing grade would be maintained throughout the majority of the Project site. Should grading be required, the additional grading would not add fill at the shoreline. The proposed office/R&D building would have a finished floor of elevation 12.0 feet, which would be 2 feet above the Federal Emergency Management Agency base flood elevation, thereby allowing 2 feet of freeboard for potential sea-level rise. The proposed parking structure would have a finished floor elevation of 6.0 feet and be dry flood proof to 1 foot above the base flood elevation.

Construction Debris and Hauling

The Project would require soil import and export, excavation, and tree removal. Approximately 15,332 cubic yards (cy) of imported and exported soil would be required during construction. Excavation depths would extend approximately 10 to 12 feet below the grade for a utility structure and 4 to 6 feet for foundation pile caps, resulting in dewatering during construction. Water generated by dewatering operation would be treated onsite and discharged to the storm drain system. No permanent groundwater dewatering would be required during operation.

The Project would also produce approximately 3,100 cy of excavated material. About 2,400 cy of the excavated material would be exported offsite; 700 cy is anticipated to be recycled onsite and used as base rock or for temporary roads. As such, construction of the Project would require the disposal of exported materials at a permitted landfill. All soil and debris, including contaminated soil, would be

hauled to the Dumbarton or Newby Landfill or a similar facility. Haul trucks would access and leave the site via Airport Boulevard, either exiting US 101 at Anza Boulevard or taking Airport Boulevard to Broadway.

Structural steel would be hauled by truck from Boise, Idaho, for use in building construction. The maximum anticipated haul distance would be 650 miles (one way). However, most haul trips are anticipated to occur within the Bay Area (e.g., from Tracy, Stockton, Gilroy). The number of truck trips required to dispose of excavated soil would be approximately 91 per day over the entire construction period. In addition, 0.1 to 0.5 acre of land would be graded each day during the site clearing subphase. After this subphase, grading work would be substantially complete, with the exception of fine grading during the landscape and site finishes subphase.

Construction Equipment and Staging

Typical equipment would be used during Project construction, including an excavator, dump truck, backhoe, bulldozer, water truck, loaders, concrete truck, forklift, concrete pump, pile drill rig, tower crane, air compressor, trailer truck, roller, and paver. Pile driving would be required for construction of deep foundations. Piles would either be driven or drilled. This work would occur during the foundation and slab-on-grade subphase of construction. One potential construction laydown and staging area would be located north of Airport Boulevard on a vacant, unused paved parking lot northeast of the Project site.

During construction, the parking areas along Burlingame Lagoon and Sanchez Channel would be fenced off. The 15 existing public parking spaces would be relocated temporarily during construction (but would still be close to the Bay Trail) and restored back to the original location upon completion of construction.

Project Approvals

The following City discretionary approvals would be required prior to development:

- Environmental review, with approval of a mitigation monitoring and reporting program
- Design review
- Conditional Use Permits for height and FAR increases
- Tree removal permit
- Grading, building, occupancy permits

Reviews/Approvals by Responsible Agencies

Reviews and approvals by other agencies that may be needed for the Project to proceed are also identified. Some of these agencies will need to approve certain parts of the Project prior to full implementation.

- Central County Fire Department – Request for alternate means of fire department access.
- Bay Area Air Quality Management District – Permits for onsite generators, boilers, and other utility equipment.

- California Regional Water Quality Control Board/San Mateo Countywide Water Pollution Prevention Program – Approval of National Pollutant Discharge Elimination System permit for stormwater discharges.
- San Mateo County Transportation Authority – Review of potential effects on public transit.
- San Mateo County Environmental Health Division – Review of food service functions and onsite generators.
- Native American Heritage Commission – Identification of areas of concern within the vicinity of the Project site or resources that may be listed in the commission's Sacred Land File.
- San Francisco Bay Conservation and Development Commission – Permit for work within 100 feet of the San Francisco Bay shoreline.
- Federal Aviation Administration – Determination of "No Hazard to Air Navigation" for 24 Aeronautical Study Numbers.
- City/County Association of Governments of San Mateo County, Airport Land Use Committee – Review of Project construction within the vicinity of an airport.

Chapter 3
Environmental Checklist

Environmental Factors Potentially Affected

The environmental factors checked below could be affected by the 567 Airport Boulevard Project (Project) (i.e., the Project would involve at least one impact that would be a "potentially significant impact"), as indicated by the checklists on the following pages.

☐ Aesthetics	☐ Agricultural and Forestry	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards/Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☒ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

Determination

On the basis of this initial evaluation:

☐ I find that the Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that, although the Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the Project have been made by or agreed to by the Project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the Project MAY have an impact on the environment that is "potentially significant" or "potentially significant unless mitigated," but at least one effect (1) has been adequately analyzed in an earlier document, pursuant to applicable legal standards, and (2) has been addressed by mitigation measures, based on the earlier analysis, as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, pursuant to applicable standards, and (b) have been avoided or mitigated, pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Project, nothing further is required.

DocuSigned by:
Kevin Gardiner
28D6423C2E8B49E...

Signature	Date
	6/24/2021
Kevin Gardiner	
Printed Name	For

Evaluation of Environmental Impacts

Introduction

This section identifies the environmental impacts of the Project by answering questions from Appendix G (Environmental Checklist Form) of the California Environmental Quality Act (CEQA) Guidelines. The environmental issues evaluated in this chapter include:

- Aesthetics
- Agricultural and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards/Hazardous Materials
- Hydrology/Water Quality
- Land Use/Planning
- Mineral Resources
- Noise
- Population/Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities/Service Systems
- Wildfire
- Mandatory Findings of Significance

The analysis in this document considers all phases of Project planning, construction, implementation, and operation. Pursuant to Section 15063(d) of the CEQA Guidelines, the document identifies the Project's environmental setting and discusses its environmental effects. For each impact identified, a level of significance is determined, using the following classifications:

- **Potentially Significant Impact** is appropriate if there is substantial evidence that an effect is significant or the established threshold has been exceeded. When a determination of "potentially significant impact" is made, an environmental impact report (EIR) may be required.
- **Less than Significant with Mitigation Incorporated** applies where the incorporation of mitigation measures would reduce an effect from "potentially significant impact" to "less-than-significant impact." Mitigation measures are prescribed to reduce the effect to a less-than-significant level.
- **Less than Significant** applies when the Project would affect or be affected by the environment, but based on sources cited in the report, the impact would not have an adverse effect and would not exceed the established thresholds.
- **No Impact** denotes situations in which there is no adverse effect on the environment. Referenced sources show that the impact does not apply to the Project.
- **Not a CEQA Impact** applies to impacts related to the environment that would affect the Project. Pursuant to the recent Supreme Court case decision in the *California Building Industry Association vs. Bay Area Air Quality Management District* case, CEQA does not require an analysis of how existing environmental conditions would affect a Project's residents or users, unless the Project would exacerbate those conditions. Therefore, when discussing impacts of the environment on the Project, the analysis first determines if the potential exists for the Project to exacerbate the issue. If evidence indicates that it would not, then the analysis concludes by stating such. If it could exacerbate the issue, then evidence is provided to determine if the exacerbation would or would not be significant.

I. Aesthetics

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:					
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a state scenic highway?	☐	☐	☐	☒
c.	Would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d.	Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	☒	☐

Setting

Regional Visual Context

The city of Burlingame is in San Mateo County, east of the Santa Cruz Mountains and west of San Francisco Bay (Bay). Burlingame is surrounded by the city of Millbrae to the northwest, the Bay to the east, the city of San Mateo to the southeast, and the town of Hillsborough to the southwest. Most of the city is within a gently sloping valley in a highly developed urban/suburban area. The western portions of the city are in the foothills of the Santa Cruz Mountains, which offer scenic views of the Bay and the East Bay Hills.

The Santa Cruz Mountains run the length of the San Francisco Peninsula and separate the Pacific Ocean from the Bay. The mountain range is the principal topographic feature in the region and visible from the majority of Burlingame as well as adjacent cities, especially in areas east of US 101. The portion visible from Burlingame includes Montara Mountain, Cahill Ridge, Sawyer Ridge, Skyline Ridge, and Sweeney Ridge. The coastal fog that spills over the ridgeline is a frequent occurrence that contributes to the regional setting's visual character.

The Envision Burlingame General Plan (General Plan or 2040 General Plan) considers views from the hills of marshlands and the Bay, as well as Old Bayshore Highway and Airport Boulevard, to be "scenic resources." According to the Burlingame General Plan, the landscape of the hills in Burlingame and the sweeping Bayfront create scenic views that merit protection and enhancement. In addition, the Burlingame General Plan considers Airport Boulevard and US 101 to be local "Scenic Roadways" through Burlingame. This is because they provide visual access to natural features, such as bodies of water, mountains, and tress, as well as built features, such as architectually significant buildings. Scenic corridors provide an enjoyable travel experience, link urban and open areas, and enable access to recreational areas.

Project Vicinity Visual Context

The Project site is in the northeast portion of the city, between US 101 and the Bay. The visual character of the relatively flat Bayfront area is influenced by both the attractive landscape along the Bay and the mix of man-made elements in the area, including industrial, office, and recreational uses. The Project site is in an urbanized area at the south end of the Burlingame Bayfront area. The northwest property line follows Airport Boulevard, which borders three adjacent office developments (411 Airport Boulevard, 433 Airport Boulevard, and 533 Airport Boulevard). The Anza parking lot (615 Airport Boulevard) is west of the Project site. Sanchez Channel, Burlingame Lagoon, the San Francisco Bay Conservation and Development Commission (BCDC) Shoreline Band, and the San Francisco Bay Trail (Bay Trail) are on the east and south sides of the Project site; these are the public frontages on the Project site. San Francisco Bay is farther to the north. To the east, across Sanchez Channel, is the Burlingame Point office development, which consists of two five-story buildings, one seven-story building, and one eight-story building.

Project Site Visual Context

The Project site, which is at Bay Park Plaza, currently includes a five-story (69-foot-tall) office building (555 Airport Boulevard) and an eight-story (90-foot-tall) office building (577 Airport Boulevard). Together, these buildings total 259,733 square feet (sf) in area. The Project site also includes surface parking lots with 879 spaces, including 15 spaces dedicated to the BCDC and Bay Trail. Along the shoreline of the Project site are paved trails, seating areas, mature trees, and vegetation. At the southeast corner of the Project site is a large, publicly accessible triangular open space with a plaza, lawns, and seating areas. Figure 9 includes views of the Project site from the Bay Trail, Sanchez Channel Bridge, and Airport Boulevard.

Because of their heights and proximity to the shoreline, the buildings at 555 Airport Boulevard and 577 Airport Boulevard are highly visible from US 101 and Burlingame Lagoon. The building at 555 Airport Boulevard has curved, bluish-green reflective glass on the north side that transitions to a façade with punched window openings encased in pre-cast concrete pilasters and spandrels. The two ends of the building are stepped down one floor. The building at 577 Airport Boulevard is wrapped in dark glazing, with pre-cast concrete bands throughout the façade. Both buildings have a general off-white tone.

The Project site is relatively flat, with grades between 4 and 12 feet (relative to NAVD 88 datum). The site slopes gently to a low-lying area at the midpoint of the property line, which is shared with other low-lying properties along Airport Boulevard to the northwest. The Project site conforms to the elevations of the shoreline protection to the east, at Sanchez Channel, and south, at Burlingame Lagoon.

Light and Glare

Light pollution refers to all forms of unwanted light in the night sky, including glare, light trespass or spill on adjacent sensitive receptors, sky glow, and over-lighting. Views of the night sky are an important part of the natural environment. Excessive light and glare can be visually disruptive to humans as well as nocturnal animal species. Commercial development (and associated lighting) is concentrated in the downtown area, at intersections along major arterials, and along the Bayfront area. Light pollution in other areas of the city is relatively minimal and restricted primarily to areas with lighting along major streets and freeways or areas with nighttime illumination within commercial and industrial buildings.

A. Bay Trail, Facing West

B. Sanchez Channel Bridge, Facing West

C. Project Site, Facing North

D. Project Site From Airport Boulevard, Facing South

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Figure 9
Existing Visual Character

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Light sources at the Project site include light fixtures on buildings as well as the lights that have been positioned around the paved parking areas. In addition, cobra-style street lighting is provided along Airport Boulevard. Although there are buildings at the Project site, the surrounding area is not brightly illuminated at night because the commercial and office buildings are in use mainly during the day.

Glare from reflective building surfaces is present because of the architectural styles of the mid-rise buildings on the Project site and in the surrounding areas. However, vegetation often blocks the reflective surfaces on the lower levels of these buildings.

Burlingame General Plan EIR

The Burlingame General Plan EIR determined that no one regulation, goal, policy, or implementation measure would completely avoid or reduce an identified environmental impact related to visual character and quality. However, the collective mitigating benefits of the regulations and policies listed in the Burlingame General Plan would result in a less-than-significant impact related to aesthetics. The following Burlingame General Plan goals and policies would be applicable to the Project:

Discussion

a. Have a substantial adverse effect on a scenic vista? (Less than Significant)

For the purposes of this analysis, a scenic vista is defined as a vantage point with a broad and expansive view of a significant landscape feature (e.g., a mountain range, lake, coastline) or a significant historic or architectural feature (e.g., a historic tower). A scenic vista is a location that offers a high-quality, harmonious, and visually interesting view.

The Burlingame General Plan does not identify scenic vistas. However, it considers views of the hillsides and the waterfront along the Bay to be scenic public views. In the vicinity of the Project site, views of the Santa Cruz Mountains and Skyline Ridge (collectively referred to as "the hillsides") are visible when facing west. However, the hillsides are viewed mainly through channelized view corridors (i.e., between the vegetation and buildings that front Airport Boulevard). The proposed office/research-and-development (R&D) building and parking structure would partially block views of the hillsides, as seen from the Bay Trail and the BCDC Shoreline Band, because of the height, bulk, and massing of the structures. However, the size and scale of the proposed structures would be similar to the size and scale of existing buildings in the Bayfront area. The new height and bulk associated with the Project would not contribute to any significant additional blockage of views to the hillsides. Therefore, although the Project would add new structures, because the height and massing would be similar to that already on the Project site, an insignificant part of the overall view available from the Bay Trail and other public areas would be affected.

The higher elevations of Burlingame provide eastern views of the city, the Bay, and the East Bay Hills. The heights of the proposed buildings would not substantially affect these vistas because of the distance between the viewers and the Project site; the superior position of the viewers (i.e., at a higher elevation), relative to the Project site; the built-out, urban nature of the city; and the vast expanse of the Bay views. The proposed structures would be a minor element in the views from higher elevations in the city. Therefore, the Project would have a ***less-than-significant*** impact on a scenic vista.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a state scenic highway? (No Impact)

The Project site is not adjacent to or in view of a designated state scenic highway or corridor. The closest designated scenic highway is Interstate (I) 280, which is approximately 2.5 miles to the west.[5] The Project site cannot be seen from any portion of I-280. Therefore, ***no impacts*** related to scenic resources within a state scenic highway corridor would occur.

c. Would the project conflict with applicable zoning and other regulations governing scenic quality? (Less than Significant)

The Project site is in an urban area. With a Conditional Use Permit, the Project would be consistent with the requirements set forth for development in the Anza Area (AA) zoning district, which serve to protect the visual character of the Bayfront area. The Project would require a Conditional Use Permit concerning the floor area ratio (FAR) because the new FAR would increase from 0.46 to 0.9. In addition, approval of the Project would require a Conditional Use Permit for the proposed height. The AA zoning district allows a maximum height of 65 feet; the Project would have a maximum height of 133 feet. Therefore, the proposed building would be visible from the surrounding Bayfront area.

The Project would add a 241,679 sf, eight-story office/R&D building and a 5.5-level parking structure at the site. Policy CC-6.3 (Infill Development) encourages increased intensity through high-quality infill development on surface parking lots and supports the conversion of surface parking lots into active commercial and hospitality uses. The proposed building and parking structure would be constructed on the surface parking lot that serves the existing buildings.

Burlingame General Plan Policy CC-6.4 (Design Character) promotes design standards that facilitate attractive interfaces between use types, enhance the public realm, and activate commercial districts. The new office/R&D building would be consistent with this policy. The building would curve slightly at the ends for a smoother visual transition to the existing buildings at the Project site. The building's design would aim to respect the architectural and waterfront context of the entire site. The north side would be clad primarily with slightly tinted glazing, with vertical fins and narrow metal bands. Goal CC-6 of the Burlingame General Plan supports a cohesive design character for the Bayfront area that protects views to the waterfront. To emphasize the view corridor to Airport Boulevard and the Bay, the first two floors at the northwest corner would be recessed and clad with highly transparent structural glass. The façade would change to a tinted glass wall that would be framed in metal pilasters. A view balcony would be on the seventh floor on the northwest corner.

To adhere to Goal CC-6, the south façade of the proposed building would be highlighted through the use of various design elements that would visually connect the design character of the proposed building to that of the existing buildings at the site. The arcades on the first and second floors would complement the architecture of the 555 Airport Boulevard building, then transition gradually to a façade with punched windows on the upper floors, matching the taller 577 Airport Boulevard building. The top two floors at the building's east end would be set back 25 feet for a proposed rooftop terrace that would be shaded by a metal trellis and canopy. This design feature would provide an amenity space for the tenants and also a transition to the shorter 555 Airport Boulevard building.

[5] California Department of Transportation. n.d. *Scenic Highways*. Available: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways. Accessed: March 17, 2021.

The design of the proposed parking structure would also integrate with the surroundings. For example, the height and mass would be similar to that of adjacent structures. The structure would include concrete structural columns and spandrels with painted finishes and varied openings. The entry points and street frontages (between the adjacent office buildings) would be framed by painted off-white portals with perforated metal panels. The two elevator/stair towers would feature an open glass façade and metal canopy that would integrate with the design of the new office/R&D building.

Goal HP-7 and Policies CC-6.1, HP-7.3, and HP-7.7 protect public views of the waterfront by restricting the height of buildings within the associated viewsheds. The AA zoning district allows a maximum height of 65 feet; the Project would have a maximum height of 133 feet. Therefore, a Conditional Use Permit would be required for the proposed height. However, the new structures would not block public views of the Bay from the Bay Trail or the open space in the southeast corner of the Project site. Because of the relatively flat topography of the Project site and vicinity, as well as the prevalence of buildings and vegetation, at-grade views from these locations are largely restricted. The new buildings would not further obstruct public views.

Policy HP-7.3 helps protect local scenic roadways, such as Airport Boulevard. According to this policy, mature trees along Airport Boulevard should be retained, and new development should not detract from the aesthetics of this corridor. The Project site is setback from Airport Boulevard. Specifically, the site is behind the buildings at 433 Airport Boulevard and 533 Airport Boulevard, which are not part of the Project site. Although the building at 577 Airport Boulevard fronts the scenic corridor, no changes are proposed in this area. The new building and parking structure would be separated from Airport Boulevard by existing buildings, which would block most views from the street to the lower levels. As shown in Figure 10, out of the 311 feet of street frontage along Airport Boulevard, approximately 174 feet would continue to have an unblocked view corridor between the existing buildings. Although the upper levels of the proposed structures would be visible, no major views would be blocked.

The Project site currently contains 303 trees, most of which are on the interior of the site and not immediately adjacent to Airport Boulevard. Construction of the Project would retain 148 trees and add 251 new trees. No existing trees adjacent to Airport Boulevard would be removed. In addition, although approximately 1.44 acres of existing vegetation would be removed and 2.11 acres of new vegetation would be planted, these changes would occur within the Project site and would not, for the most part, be visible from Airport Boulevard or the surrounding areas. An outdoor landscaping program would incorporate “flex” amenity spaces adjacent to each building and tie the landscape together with the appropriate plant materials, hardscape geometry, and paving materials.

Policy HP-7.5 identifies connectivity opportunities for areas between scenic routes (e.g., Airport Boulevard) and adjacent public recreation areas such as parks, scenic outlooks, and biking and hiking trails. A new open space is proposed adjacent to the new office/R&D building that would provide opportunities for outdoor amenities. The open space would include an overlook with views of Burlingame Lagoon and the Santa Cruz Mountains and provide a variety of seating areas, dining opportunities, and lawn games. Existing open spaces at the Project site would be retained under the Project. Furthermore, the Project would maintain public access to the BCDC Shoreline Band, including the Bay Trail and 15 dedicated parking spaces, during and after construction. The Bay Trail, vegetation, and amenities within the BCDC Shoreline Band would not be altered.

Although the Project would increase onsite building height, massing, and bulk, the Project would not have a significant impact on existing visual character. Currently, the Bayfront area consists of a variety of buildings that range from older low-rise office and industrial buildings to newer multi-story office and hotel buildings. Although the proposed building would be taller than surrounding development in the immediate area, it would replace existing surface parking lots with structures and enhanced landscaping that would complement the surroundings. The proposed development would increase unity by creating new buildings and landscaped areas that would reflect similar architectural designs.

Consistent with Burlingame Municipal Code Section 25.47.052, the Planning Commission would review the Project for consistency with exterior building design guidelines for the Anza subarea. In particular, the proposed architecture and landscaping would be reviewed for compatibility with the materials used in existing development, the location and use of plant materials, and the transitions where changes in land use would occur.

As discussed above, the Project would require a Conditional Use Permit for the FAR and height. The Project would be consistent with all other zoning regulations that serve to protect the visual character of the Bayfront area, including those pertaining to use, setbacks, parking, view corridors, lot coverage, lot frontage, minimum lot size, landscaping, and trash and loading areas. Therefore, assuming the City of Burlingame (City) approves a Conditional Use Permit for the FAR and height increases, the Project would not conflict with AA zoning requirements. Adherence to relevant design guidelines and Burlingame General Plan goals and policies would ensure that the Project would not result in substantial degradation of the existing visual character or quality of the Project site or its surroundings. Moreover, the Project would be subject to the City's design review process and landscaping standards to ensure visual compatibility with the character of the surrounding area. Therefore, the Project would not conflict with applicable zoning or other regulations that govern scenic quality. The impact would be considered ***less than significant***.

Although a shadow analysis is not required under CEQA, a summary of the shadow analysis for the Project (Appendix A) is included here for informational purposes. Significant shading on a public open space could be considered an impact if new shadows were to change the usability, comfort, or visual appearance of a space. Public recreational fields, pathways, plazas, and courtyards could be affected by new shadows. Nearby parks and public open spaces include Robert E. Wooley State Park, Fisherman's Park, the Bay Trail, the BCDC Shoreline Band, and the plaza at the southeast corner of the Project site. Therefore, a shadow study was conducted for the Project.[6] As shown in Figures 11 through 13, throughout the year, the Project would generate net new morning shadow that would be cast to the west or northwest, at times as far as Airport Boulevard, affecting primarily existing surface parking areas and some small landscaped areas. Midday, net new shadow would be restricted to the parking areas for the building at 533 Airport Boulevard, just north of the proposed parking structure; it would also affect portions of the drive aisle, parking spaces between the proposed office/R&D building and the parking structure, and small areas of landscaping. Afternoon shadows would stretch to the east or northeast and cross surface parking lots and some landscaped areas as well as pedestrian pathways, at times reaching as far east as the channel that connects Burlingame Lagoon to the Bay.

[6] Prevision Design. 2021. *567 Airport Boulevard Shadow Analysis and Findings*. March 30.

PROPOSED CONDITIONS

Total Frontage	311 ft
Unblocked View Corridor (Thru Buildings)	174 ft

56% of Project Frontage

N

Source: DES Architects/EverWest, 2020.

ICF Graphics ... 00640.20 (4-22-2021) JC

ICF

Figure 10
View Corridors

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Source: Prevision Design, 2021

ICF Graphics ... 00640.20 (4-14-2021) JC

Figure 11
Shading Diagrams on Summer Solstice (June 21)

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Source: Prevision Design, 2021

ICF Graphics ... 00640.20 (4-14-2021) JC

Figure 12
Shading Diagrams on Vernal Autumal Equinoxes (March 21, September 21)

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Source: Prevision Design, 2021

ICF Graphics ... 00640.20 (4-14-2021) JC

ICF

Figure 13
Shading Diagrams on Winter Solstice (December 21)

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The proposed structures would be located toward the middle of the Project site. Therefore, for most of the year, nearby areas would not receive any net new shadow from the Project site. However, a portion of the Bay Trail along the eastern border of the Project site, along Sanchez Channel, would be in shadow in the late afternoon during the winter solstice. However, the shadow would affect only a small portion of the Bay Trail. Users of this segment of the Bay Trail, such as cyclists and pedestrians, would be shaded only briefly as they pass by. Therefore, the Project would not substantially alter shadow conditions on the Bay Trail or in surrounding open space areas.

d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area? (Less than Significant)

The Project site is currently developed and urbanized. Streetlights, exterior commercial lighting, and vehicular lights are found in the surrounding area and along adjacent corridors, particularly Airport Boulevard and US 101. Building, parking lot, and security lighting are present throughout the Project site, although to a lesser extent than under Project conditions. Proposed development at the Project site would result in increased nighttime lighting from vehicles, interior circulation areas, the parking structure, the new office/R&D building, and security features. Lighting would continue to be provided throughout the Project site by roadway/driveway lights, area lights, bollards, and in-ground lights.

Site lighting would complement the geometry of the landscape design as well as the materials used in the architectural design of the new building. Although the new buildings would contribute additional sources of light, exterior lighting would be designed and installed to comply with existing regulations, including those regarding light pollution. Exterior light fixtures at the Project site would comply with the California Building Standards Code (Title 24, Building Energy Efficiency Standards), which requires new fixtures to reduce the amount of lateral spreading to surrounding uses. This is consistent with Burlingame Municipal Code Section 18.16.030, which requires all new exterior lighting for commercial developments to be designed and located so that the cone of light and/or glare from the light element is kept entirely on the property or below the top of any fence, edge, or wall. With adherence to this requirement, the light footprint would not extend beyond the periphery of the Project site.

Glass surfaces on the proposed structures would increase reflected sunlight, ambient light, and glare compared with existing conditions. However, as described above, the new exterior lighting for the Project would be designed to minimize light and glare, per existing regulations. Therefore, impacts due to light and glare would be ***less than significant***.

II. Agricultural and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
In determining whether impacts on agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts on forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project, and forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned for timberland production (as defined by Government Code Section 51104[g])?	☐	☐	☐	☒
d. Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment that, because of their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Setting

The Project site at Bay Park Plaza is currently occupied by two multi-tenant office buildings with a total of 259,733 sf and surface parking lots with 879 spaces; therefore, the site is fully developed. The California Department of Conservation map of important farmland identifies the city of Burlingame, including the entirety of the Project site, as Urban and Built-up Land.[7]

Burlingame General Plan EIR

The Burlingame General Plan EIR found no impacts related to agricultural and forestry resources. No mitigation measures were warranted.

Discussion

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use? (No Impact)

The Project site and all surrounding lands are identified as Urban and Built-up Land by the California Department of Conservation. No important farmland, including Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, exists within or adjacent to the Project site.[8] There is no potential for the Project to result in the conversion of important farmland to non-agricultural uses, and there would be ***no impact.***

b. Conflict with existing zoning for agricultural use or conflict with a Williamson Act contract? (No Impact)

The Project site is zoned AA under the Burlingame General Plan; AA zoning does not allow agricultural land uses. Accordingly, no agricultural land, including agricultural land under a Williamson Act or Farmland Security Zone contract, currently exists at the Project site.[9] Therefore, the Project would not result in a conflict with existing zoning for agricultural use or a Williamson Act contract, and there would be ***no impact.***

c. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220[g]), timberland (as defined by Public Resources Code Section 4526), or timberland zoned for timberland production (as defined by Government Code Section 51104[g])? (No Impact)

The site is not zoned for forestland, timberland, or timberland production.[10] Therefore, the Project would not conflict with zoning for such land, and accordingly, there would be ***no impact.***

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7 California Department of Conservation. 2016. *San Mateo County Important Farmland*. Division of Land Resource Protection: Farmland Mapping and Monitoring Program. Available: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed: January 7, 2021.

8 Ibid.

9 City of Burlingame. 2016. *Burlingame General Plan, Zoning*. Draft 1. June. Available: https://cms6.revize.com/revize/burlingamecity/document_center/Zoning/Citywide%20Zoning%20Map%20ZoningMap-Burlingame.pdf. Accessed: January 7, 2021.

10 Ibid.

d. Result in the loss of forestland or conversion of forestland to non-forest use? (No Impact)

As described above, there is no forestland within the Project site.[11] Therefore, the Project would not convert such land to an alternative use, and accordingly, there would be ***no impact.***

e. Involve other changes in the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forestland to non-forest use? (No Impact)

Other changes in the existing environment that, because of their location or nature, could result in the conversion of Farmland to non-agricultural use or the conversion of forestland to non-forest use could include actions that would affect livestock on Farmland of Local Importance or actions that would affect forest health. Because there is no livestock at the Project site, there would be no impact related to the conversion of Farmland to nonagricultural use. Because there is no forestland at the Project site, there would be ***no impact*** related to the conversion of Farmland or forestland to alternative uses.

[11] Ibid.

III. Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b. Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people?	☐	☐	☒	☐

Setting

The Project site is in the city of Burlingame in San Mateo County, which is within the San Francisco Bay Area Air Basin (SFBAAB). Concentrations of ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), lead, and particulate matter (PM_{10} [particulate matter no more than 10 microns in diameter] and $PM_{2.5}$ [particulate matter no more than 2.5 microns in diameter]) are commonly used as indicators of ambient air quality conditions. These pollutants are known as criteria pollutants and regulated by the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) through national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), respectively. The NAAQS and CAAQS limit criteria pollutant concentrations to protect human health and prevent environmental and property damage. Other pollutants of concern in the Project area are nitrogen oxides (NO_X) and reactive organic gases (ROGs), which are precursors to O_3, and toxic air contaminants (TACs), which can cause cancer and other human health concerns.

Ambient Criteria Pollutant Conditions and Regional Attainment Status

Criteria pollutant concentrations in San Mateo County and the SFBAAB are measured at several monitoring stations. The closest to the Project site is the Redwood City station, which is approximately 10.5 miles southeast of the site. However, PM_{10} is not measured at the Redwood City station; therefore, data from the next-closest station that monitors PM_{10} (the San Francisco-Arkansas Street station, approximately 13 miles north of the Project site) have been collected as well. The monitoring data in Table 3-1 show that the stations near the Project site experienced no violations of CO, NO_2, and national PM_{10} standards between 2017 and 2019, the most recent years with available data. There were two violations of both the 1-hour and 8-hour O_3 standards in 2017 and 2019. There were two violations of the state 24-hour PM_{10} standard and six violations of the national 24-hour $PM_{2.5}$ standard in 2017. In addition, there were 13 violations of the national 24-hour $PM_{2.5}$ standard in 2018. Violations of the O_3 and particulate matter ambient air quality standards indicate that exposed individuals may experience certain health effects, including increased incidences of cardiovascular and respiratory ailments.

Table 3-1. Ambient Air Quality Monitoring Data at the Redwood City and San Francisco-Arkansas Street Monitoring Stations (2017–2019)

Pollutant Standards	2017	2018	2019
Ozone (O_3) at Redwood City station			
Maximum 1-hour concentration (ppm)	0.115	0.067	0.083
Maximum 8-hour concentration (ppm)	0.086	0.049	0.077
Fourth-highest 8-hour concentration (ppm)	0.055	0.048	0.054
Number of days standard exceeded			
CAAQS 1-hour standard (> 0.09 ppm)	2	0	0
CAAQS 8-hour standard (> 0.070 ppm)	2	0	2
NAAQS 8-hour standard (> 0.070 ppm)	2	0	2
Particulate Matter (PM_{10}) at San Francisco-Arkansas Street station			
Maximum state 24-hour concentration (μg/m³)	77.0	43.0	42.0
Maximum national 24-hour concentration (μg/m³)	75.9	40.9	42.1
National annual average concentration	11.0	10.0	7.5
Measured number of days standard exceeded			
CAAQS 24-hour standard (50 μg/m³)	2	0	0
NAAQS 24-hour standard (150 μg/m³)	0	0	0
Carbon Monoxide (CO) at Redwood City station			
Maximum 8-hour concentration (ppm)	1.4	1.7	1.1
Maximum 1-hour concentration (ppm)	2.8	2.5	2.0
Number of days standard exceeded			
NAAQS 8-hour standard (≥ 9 ppm)	0	0	0
CAAQS 8-hour standard (≥ 9.0 ppm)	0	0	0
NAAQS 1-hour standard (> 35 ppm)	0	0	0
CAAQS 1-hour standard (≥ 20 ppm)	0	0	0
Particulate Matter ($PM_{2.5}$) at Redwood City station			
Maximum state 24-hour concentration (μg/m³)	60.8	120.9	29.5
Maximum national 24-hour concentration (μg/m³)	60.8	120.9	29.5
National annual average concentration	9.0	10.5	7.0
Measured number of days standard exceeded			
NAAQS 24-hour standard (> 35 μg/m³)	6	13	0
Nitrogen Dioxide (NO_2) from Redwood City station			
Maximum state 1-hour concentration (ppm)	0.067	0.077	0.054
Annual average concentration (ppm)	0.010	0.010	0.009
Number of days standard exceeded			
CAAQS 1-hour standard (0.18 ppm)	0	0	0
NAAQS 1-hour standard (0.100 ppm)	0	0	0

Sources: California Air Resources Board. 2020. *iADAM: Air Quality Data Statistics.* Top 4 Summary. Available: https://www.arb.ca.gov/adam/topfour/topfour1.php. Accessed: April 2021; U.S. Environmental Protection Agency. 2020. *Monitor Values Report*. Available: https://www.epa.gov/outdoor-air-quality-data/monitor-values-report. Accessed: April 2021.

Notes: ppm = parts per million; μg/m³ = micrograms per cubic meter

An exceedance is not necessarily a violation.

State statistics are based on local-conditions data; state statistics are based on California-approved samplers.

National statistics are based on standard-conditions data. In addition, national statistics are based on samplers, using federal reference or equivalent methods.

State criteria for ensuring data are adequate for calculating valid annual averages are more stringent than national criteria.

Local monitoring data are used to designate areas as nonattainment, maintenance, attainment, or unclassified areas, according to the ambient air quality standards. San Mateo County is currently classified as a nonattainment area for the federal and state O_3 and $PM_{2.5}$ standards and a nonattainment area for the state PM_{10} standard.[12]

Regulatory Setting

The Bay Area Air Quality Management District (BAAQMD) is responsible for ensuring that the NAAQS and CAAQS are met within the SFBAAB. BAAQMD manages air quality through a comprehensive program that includes long-term planning, regulations, incentives for technical innovation, education, and community outreach. BAAQMD has also adopted air quality plans to improve air quality, protect public health, and protect the climate; these include BAAQMD's 2017 *Clean Air Plan: Spare the Air, Cool the Climate* (Clean Air Plan).[13] The 2017 Clean Air Plan provides an integrated strategy to reduce O_3, particulate matter, TACs, and greenhouse gas (GHG) emissions in a manner that is consistent with federal and state air quality programs and regulations.

BAAQMD's CEQA Guidelines provide guidance for evaluating air quality impacts. They also contain thresholds of significance for O_3, CO, PM_{10}, $PM_{2.5}$, TACs, and odors.[14] As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make checklist determinations. Accordingly, BAAQMD's thresholds, as outlined in its CEQA Guidelines and summarized in Table 3-2, are used to evaluate the significance of air quality impacts associated with the Project, as described below.

Criteria Air Pollutants

BAAQMD's significance thresholds for criteria pollutants (ROGs, NO_X, PM_{10}, and $PM_{2.5}$), as shown in Table 3-2, are based on the stationary-source emissions limits of the federal Clean Air Act (CAA) and BAAQMD Regulation 2, Rule 2. The federal New Source Review program, created by the federal CAA, set emissions limits to ensure that stationary sources of air pollution are constructed in a manner that is consistent with attainment of the NAAQS. Similarly, to ensure that new stationary sources do not cause or contribute to a violation of the NAAQS, BAAQMD Regulation 2, Rule 2, requires any new source that emits criteria air pollutants above specified emissions limits to offset those emissions. Although the emission limits are adopted in the regulation to control stationary-source emissions, the amount of the emission is the key determining factor, regardless of source, when addressing the public health impacts of regional criteria pollutants. Therefore, the emissions limits are appropriate for the evaluation of land use development and construction activities as well as stationary sources. Those projects that would result in emissions that would be below the thresholds would not be considered projects that would contribute to an existing or projected air quality violation or result in a considerable net increase in criteria pollutant emissions.

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[12] California Air Resources Board. 2021. *Appendix C: Maps and Tables of Area Designations for State and National Ambient Air Quality Standards.* January. Available: https://ww3.arb.ca.gov/regact/2021/sad20/appc.pdf. Accessed: April 2021.

[13] Bay Area Air Quality Management District. 2017. *Clean Air Plan, Spare the Air, Cool the Climate.* Final. Adopted: April 19. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: April 2021.

[14] Bay Area Air Quality Management District. 2017. *California Environmental Quality Act Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: April 2021.

Table 3-2. Bay Area Air Quality Management District Thresholds of Significance

Pollutant	Construction	Operations
ROGs	54 pounds/day	54 pounds/day or 10 tons/year
NO_X	54 pounds/day	54 pounds/day or 10 tons/year
CO	—	Violation of CAAQS
PM_{10} (exhaust)	82 pounds/day	82 pounds/day or 15 tons/year
$PM_{2.5}$ (exhaust)	54 pounds/day	54 pounds/day or 10 tons/year
$PM_{10}/PM_{2.5}$ (dust)	Best management practices	—
TACs (project level)	Increased cancer risk of 10.0 in 1 million, increased non-cancer risk more than 1.0 (hazard index), $PM_{2.5}$ increase more than 0.3 microgram per cubic meter	Same as construction
TACs (cumulative)	Increased cancer risk of 100 in 1 million, increased non-cancer risk more than 10.0, $PM_{2.5}$ increase more than 0.8 microgram per cubic meter at receptors within 1,000 feet	Same as construction
Odors	—	Five complaints per year, averaged over 3 years

Source: Bay Area Air Quality Management District. 2017a. *California Environmental Quality Act: Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: April 2021.

Notes: ROGs = reactive organic gases; NO_X = nitrogen oxide; CO = carbon monoxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter; TACs = toxic air contaminants; CAAQS = California ambient air quality standards

Note that the federal New Source Review emissions limits and BAAQMD's offset limits are identified in the BAAQMD regulation on an annual basis (in tons per year). For construction activities, the limits are converted to average daily emissions (in pounds per day), as shown in Table 3-2, because of the short-term and intermittent nature of construction activities. If emissions would not exceed average daily emissions limits, the Project would not exceed annual levels.

Localized CO Hot Spots

BAAQMD's screening guide for CO impacts requires projects to meet three criteria to result in a less-than-significant impact:

1. Be consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, a regional transportation plan, or local congestion management agency plans.
2. Not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
3. Not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., a tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

If the Project does not meet all of the screening criteria, then CO emissions should be quantified using the EMission FACtor (EMFAC) model and California Line Source Dispersion Model (CALINE4) to determine CO concentrations near affected roadways or facilities. Project CO concentrations plus background concentrations would be compared against the 1-hour and 8-hour NAAQS thresholds of significance for CO to determine whether there would be a significant impact on air quality.

Toxic Air Contaminants

BAAQMD's TAC thresholds are based on the cancer and non-cancer risk limits for new and modified sources adopted in BAAQMD Regulation 2, Rule 5, and EPA's significant impact level for $PM_{2.5}$ concentrations. The EPA significant impact level is a measure of whether a source may cause or contribute to a violation of the NAAQS. Health risks due to TACs from construction, though temporary, can still result in substantial public health impacts because of increased cancer and non-cancer risks. Applying quantitative thresholds allows a rigorous standardized method to be used to determine when a construction project will cause a significant increase in cancer and non-cancer risks. The cumulative health risk thresholds are based on EPA guidance for conducting TAC analyses and making risk management decisions at the facility and community levels. The cumulative health risk thresholds are also consistent with the ambient cancer risk in the most pristine portions of the Bay Area and based on BAAQMD's recent regional modeling analysis as well as the non-cancer mandatory risk reduction levels for hot spots with toxic air.[15]

For evaluation purposes, TACs are separated into carcinogens and non-carcinogens, based on the nature of the physiological effects associated with exposure to the pollutant. Carcinogens are assumed to have no safe threshold below which health impacts would not occur; cancer risk is expressed as excess cancer cases per 1 million exposed individuals, typically over a lifetime of exposure. Non-carcinogenic substances differ in that there is generally assumed to be a safe level of exposure below which no negative health impact is believed to occur. These levels are determined on a pollutant-by-pollutant basis. Acute and chronic exposure to non-carcinogens is expressed as a hazard index, which is the ratio of expected exposure level to an acceptable reference exposure level.[16] BAAQMD's TAC thresholds are presented in Table 3-2 and used to support the health risk assessment for the Project.

Odors

The odor threshold is consistent with BAAQMD Regulation 7 for odorous substances and reflects the most stringent standards derived from the air district rule.

Discussion

a. Conflict with or obstruct implementation of the applicable air quality plan? (Less than Significant)

The federal CAA requires a State Implementation Plan (SIP) or an air quality control plan to be prepared for areas with air quality that violates the NAAQS. The SIP sets forth the strategies and pollution control measures that states use to attain the NAAQS. The California CAA requires attainment plans to demonstrate a 5 percent reduction in nonattainment air pollutants or their precursors each year, averaged every consecutive 3-year period, unless an approved alternative measure of progress is developed. Air quality attainment plans outline emissions limits and control measures to achieve and maintain the standards by the earliest practical date. The current air quality attainment plan for the SFBAAB is the 2017 Clean Air Plan.

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[15] Bay Area Air Quality Management District. 2009. *California Environmental Quality Act Guidelines Update: Proposed Thresholds of Significance*. December. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/proposed-thresholds-of-significance-dec-7-09.pdf?la=en. Accessed: April 2021.

[16] Bay Area Air Quality Management District. 2017. *California Environmental Quality Act Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: April 2021.

Projects that result in regional growth in population, employment, or vehicle miles traveled (VMT) and exceed the estimates used to develop the 2017 Clean Air Plan, which are based on growth projections from the Association of Bay Area Governments (ABAG) and local general plans, would be inconsistent with the 2017 Clean Air Plan. Accordingly, projects that propose development that is consistent with the growth anticipated by ABAG and local general plans would be consistent with the 2017 Clean Air Plan.

As described below in Section XI, *Land Use and Planning*, the Project would be generally consistent with the goals and policies of the Burlingame General Plan. In addition, the Project would be consistent with the existing land use designations and include uses that would be consistent with those permitted under the Burlingame General Plan as well as the Burlingame Municipal Code. Because the Project's land uses are accounted for in the Burlingame General Plan, the Project would be consistent with the growth anticipated in the 2017 Clean Air Plan.

The Project would be close to high-quality transit options provided by the San Mateo County Transit District (SamTrans), the Burlingame Trolley, and the Burlingame Bayside Shuttle. In the immediate vicinity of the Project, SamTrans Routes ECR, 46, 292, 397, and 398 provide service to the Project site and vicinity. The closest SamTrans bus stop, serving Route 292, is 500 feet west of the intersection of Bayshore Highway and Airport Boulevard/Broadway. The closest Burlingame Trolley stop is at the Hilton Hotel, across the street from the Project site. The closest Burlingame Bayside Shuttle stop is adjacent to the Project site at the corner of Airport Boulevard and Bay View Place.

The Project would incorporate transportation demand management (TDM) strategies to achieve a 20 percent reduction in trip generation rates. The TDM would be implemented consistent with the City 2030 Climate Action Plan (see Section VIII, *Greenhouse Gas Emissions*) and City/County Association of Governments (C/CAG) of San Mateo County requirements. The strategies in the TDM would include providing showers and lockers rooms for bicyclists and/or pedestrians who commute to work, subsidized transit passes, and preferential parking for carpools and vanpools. Accordingly, the Project would not conflict with the 2017 Clean Air Plan; this impact would be ***less than significant***.

b. Result in a cumulatively considerable net increase in any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard? (Less than Significant with Mitigation)

To assist lead agencies in determining whether a project would exceed the criteria air pollutant significance thresholds shown in Table 3-2, BAAQMD developed screening criteria as part of its CEQA Guidelines. In developing the thresholds, BAAQMD considered the levels at which a project's emissions become cumulatively considerable. As noted in its CEQA Guidelines:

> In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts on the region's existing air quality conditions. Therefore, additional analysis to assess cumulative impacts is unnecessary.

Consequently, exceedances of project-level thresholds would be cumulatively considerable.

Construction

Construction of the build alternatives would generate emissions of ROG, NO_X, PM_{10}, and $PM_{2.5}$ that could result in short-term air quality effects during the construction period. Emissions would be generated from the exhaust of off-road equipment, employee vehicles and haul trucks, site grading and earth movement (i.e., fugitive dust), re-entrained road dust from vehicle travel, and off-gassing from paving and architectural coatings. For particulate matter emissions, BAAQMD regional thresholds for construction require only an evaluation of exhaust emissions; however, the air quality analysis also estimates fugitive dust emissions for the $PM_{2.5}$ analysis (see Impact IIIc, below). Fugitive dust emissions during construction would be controlled using best management practices (BMPs). Emissions were estimated using emission factors and methodologies consistent with the California Emissions Estimator Model (CalEEMod), version 2016.3.2; CARB's EMFAC2021 model; and EPA's AP-42: Compilation of Air Pollutant Emission Factors. The estimates also relied on a combination of Project-specific information provided by the Project Sponsor and default values from CalEEMod.

Project construction is expected to start in January 2022 and have a duration of approximately 26 months; occupancy is projected to occur in March 2024. The Project would be constructed in one phase, consisting of the following six subphases: demolition and site clearing, foundations and slab on grade, superstructure, building skin, interior core buildout, and landscape and site finishes.

The level of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring simultaneously. To provide the most conservative analysis, maximum daily emissions estimates were calculated to assess construction impacts. Maximum daily emissions typically occur during phases with the greatest intensity of construction activity but also when various construction phases overlap on a given day. The unmitigated maximum daily criteria air pollutant emissions that would be generated during Project construction are shown in Table 3-3. The unmitigated scenario evaluated off-road construction equipment exhaust emissions using CalEEMod's default fleet emissions factors. Model outputs are provided in Appendix B.

Table 3-3. Estimated Unmitigated Maximum Daily Construction Emissions

	Maximum Daily Emissions (pounds/day)[a]					
Construction Phase	**ROG**	**NO_X**	**PM_{10} Fugitive**	**PM_{10} Exhaust**	**$PM_{2.5}$ Fugitive**	**$PM_{2.5}$ Exhaust**
Demolition and Site Clearing	1.90	27.97	12.48	0.80	2.84	0.74
Foundations and Slab On Grade	3.79	57.72	8.61	1.15	1.43	1.09
Superstructure	3.15	36.85	12.28	0.84	1.97	0.82
Superstructure, Haul Trucks Only	0.03	1.62	0.53	0.02	0.09	0.02
Building Skin	10.78	25.34	2.74	0.95	0.56	0.87
Interior Core Buildout	2.81	1.22	1.88	0.01	0.42	0.01
Landscape and Site Finishes	1.05	9.46	2.52	0.38	0.44	0.35
Maximum Daily Emissions	**16.77**	**65.03**	**17.43**	**1.81**	**3.05**	**1.72**
BAAQMD Significance Threshold	54	54	**n/a**	82	**n/a**	54
Exceeds Threshold?	**No**	**Yes**		**No**		**No**

Source: Modeling files provided in Appendix B.

Notes: BAAQMD = Bay Area Air Quality Management District; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter; n/a = BAAQMD has not developed a threshold for this pollutant

[a] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions will be controlled using best management practices.

As shown in Table 3-3, construction of the Project would result in emissions that would exceed the BAAQMD threshold for NO_X; it would not exceed the threshold for any other pollutant. Exceedance of the NO_X threshold would be caused by exhaust emissions generated by off-road equipment (e.g., excavators, backhoes, bulldozers) used on the Project site as well as offsite truck trips (e.g., to haul construction material). Therefore, construction impacts are potentially significant, and mitigation is required.

To mitigate the impact from the exceedance of the NO_X threshold, Mitigation Measure AQ-1 would require the use of EPA-approved Tier 4 Final engines in off-road equipment greater than 50 horsepower during construction. Construction emissions with implementation of Mitigation Measure AQ-1 are shown in Table 3-4. With implementation of this mitigation measure, emissions would be reduced to below the BAAQMD threshold for NO_X emissions. This impact would be less than significant with mitigation.

BAAQMD's CEQA Guidelines consider fugitive dust impacts to be less than significant with application of BMPs. If BMPs are not implemented, then dust impacts would be potentially significant. Therefore, BMPs would be required and implemented to reduce impacts from construction-related fugitive dust emissions, including any cumulative impacts. With BMPs, dust emissions would be reduced, and the impact would be less than significant.

Table 3-4. Estimated Mitigated Maximum Daily Construction Emissions

	Maximum Daily Emissions (pounds/day)[a]					
Construction Phase	**ROG**	**NO_X**	**PM_{10} Fugitive**	**PM_{10} Exhaust**	**$PM_{2.5}$ Fugitive**	**$PM_{2.5}$ Exhaust**
Demolition and Site Clearing	0.74	15.18	12.48	0.18	2.84	0.17
Foundations and Slab On Grade	2.48	41.90	8.61	0.58	1.43	0.55
Superstructure	2.24	28.75	12.28	0.52	1.97	0.50
Superstructure, Haul Trucks Only	0.03	1.62	0.53	0.02	0.09	0.02
Building Skin	9.50	8.50	2.74	0.25	0.56	0.23
Interior Core Buildout	2.81	1.22	1.88	0.01	0.42	0.01
Landscape and Site Finishes	1.05	9.46	2.52	0.38	0.44	0.35
Maximum Daily Emissions	**14.57**	**41.90**	**17.43**	**0.80**	**3.05**	**0.76**
BAAQMD Significance Threshold	54	54	**n/a**	82	**n/a**	54
Exceeds Threshold?	**No**	**No**		**No**		**No**

Source: Modeling files provided in Appendix B.

Notes: BAAQMD = Bay Area Air Quality Management District; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter; n/a = BAAQMD has not developed a threshold for this pollutant

[a] BAAQMD construction thresholds for PM_{10} and $PM_{2.5}$ evaluate only exhaust emissions. Fugitive dust emissions will be controlled using best management practices.

Because construction-related emissions of criteria pollutants would be below BAAQMD thresholds, construction of the Project would not be expected to contribute a significant level of air pollution such that air quality within the SFBAAB would be degraded. Consequently, the impact from construction-generated criteria pollutant emissions would be ***less than significant with mitigation***.

Mitigation Measure AQ-1: Use Tier 4 Construction Equipment

The Project Sponsor shall ensure that all off-road diesel-powered equipment greater than 50 horsepower used during construction is equipped with engines that meet EPA Tier 4 Final emission standards.

Operation

The criteria pollutant emissions that would be generated during Project operations were quantified using CalEEMod and EMFAC2021; average daily traffic was also considered. Long-term emissions would be caused primarily by vehicle trips generated by future occupants and delivery trucks, with additional emissions from area sources (e.g., cleaning supplies, paint applications, landscaping equipment) and energy sources. Stationary-source emissions would be caused by intermittent use of two diesel-powered emergency generators with ratings of 750 kilowatts (kW) and 1,500 kW. The emergency generators would be operated 15 minutes each per month for maintenance testing.

The Project's estimated daily operational emissions are presented in Table 3-5 and compared to BAAQMD's operational criteria pollutant thresholds. Model outputs are provided in Appendix B.

Table 3-5. Estimated Unmitigated Maximum Daily Operational Emissions

	Maximum Daily Emissions (pounds/day)			
Source Category	**ROG**	**NO_X**	**PM_{10}[a]**	**$PM_{2.5}$[a]**
Area	6.10	< 0.01	< 0.01	< 0.01
Energy	0.30	2.69	0.20	0.20
Mobile	6.00	8.14	21.73	5.49
Stationary	1.41	6.31	0.21	0.21
Total Operational Emissions	**13.81**	**17.15**	**22.14**	**5.91**
BAAQMD Significance Threshold	54	54	82	54
Exceeds Threshold?	**No**	**No**	**No**	**No**

Source: Modeling files provided in Appendix B.

Notes: BAAQMD = Bay Area Air Quality Management District; ROG= reactive organic gases; NO_X = nitrogen oxide; PM_{10} = particulate matter no more than 10 microns in diameter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

[a] BAAQMD operational thresholds for PM_{10} and $PM_{2.5}$ include both fugitive dust and exhaust emissions.

As shown in Table 3-5, operation of the Project would not generate ROG, NO_X, or particulate matter that would be in excess of BAAQMD thresholds. The Project would have a less-than-significant impact on air quality during operation. It would not contribute a significant level of air pollution that would degrade regional air quality within the SFBAAB, and the impact would be less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations? (Less than Significant)

Sensitive land uses are defined as locations where human populations, especially children, seniors, and sick persons, are located and where there is reasonable expectation of continuous human exposure, according to the averaging period for the air quality standards (i.e., 24 hours, 8 hours). Per BAAQMD, typical sensitive receptors are residences, hospitals, and schools. Parks and playgrounds

where sensitive receptors (e.g., children and seniors) are present would also be considered sensitive receptors.[17] The nearest sensitive land uses are the residences located approximately 700 feet south of the Project site and south of the US 101.

The primary pollutants of concern with regard to health risks for sensitive receptors are criteria pollutants, including those associated with localized CO hot spots; asbestos; diesel particulate matter (DPM); and localized $PM_{2.5}$. Each of these pollutants, including the potential impact on nearby receptors, is analyzed in the paragraphs that follow.

Criteria Pollutants

As discussed above, BAAQMD has developed region-specific CEQA thresholds of significance for air pollutant concentrations and attainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates that there are safe concentrations for criteria pollutants. Although it recognizes that air quality is a cumulative problem, BAAQMD considers the impacts of projects that generate criteria pollutant and O_3 precursor emissions that are below the thresholds to be minor in nature. Such projects would not adversely affect air quality or cause the NAAQS or CAAQS to be exceeded.

As shown in Table 3-4, construction of the Project would not generate regional criteria pollutants that would be excess of BAAQMD thresholds with implementation of Mitigation Measure AQ-1, which requires the use of Tier 4 Final off-road construction equipment and BMPs to reduce fugitive dust emissions during construction. As such, construction of the Project would not be expected to contribute a significant level of air pollution that would degrade air quality within the SFBAAB. The impact from construction-generated criteria pollutant emissions would be less than significant with mitigation. For criteria air pollutants during construction, the Project would not expose receptors to substantial pollutant concentrations or risks.

As shown in Table 3-5, operation of the Project would not generate regional criteria pollutants or precursors that would exceed BAAQMD's thresholds of significance. Consequently, the impact from operational criteria pollutant emissions would be less than significant. During operations, the Project would not expose receptors to substantial pollutant concentrations or risks.

Localized CO Hot Spots

Continuous engine exhaust may elevate localized CO concentrations, resulting in "hot spots." Receptors who are exposed to these CO hot spots may have a greater likelihood of developing adverse health effects. CO hot spots are typically observed at heavily congested intersections where a substantial number of gasoline-powered vehicles idle for prolonged durations throughout the day.

Peak-hour traffic volumes at 12 intersections in the Project vicinity were analyzed to determine whether the Project would meet BAAQMD screening criteria. Maximum traffic volumes at the intersections under all scenarios would be well below the 44,000-vehicle-per-hour screening threshold. Also, intersection traffic volumes under all scenarios would be below the 24,000-vehicle-per-hour screening threshold for areas where vertical and/or horizontal mixing is substantially

[17] Bay Area Air Quality Management District. 2017. *California Environmental Quality Act Air Quality Guidelines.* May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: April 2021.

limited; therefore, there would be no exceedance of either the non-limited mixing threshold (44,000 vehicles per hour) or the limited vertical/horizontal mixing threshold (24,000 vehicles per hour). Furthermore, none of the 12 intersections is designated as a congestion management program intersection. The Project would not result in an exceedance of the BAAQMD screening criteria, and CO concentrations would not exceed the CAAQS. This impact would be less than significant.

Toxic Air Contaminants

Asbestos

Asbestos is a naturally occurring mineral that was once used in building construction because of its heat resistance and strong insulating properties. Exposure to asbestos, however, has been shown to cause many disabling or fatal diseases, including lung cancer, mesothelioma, and pleural plaques. The Project would not demolish any buildings as part of construction activities but would remove areas of asphalt and hardscape. It is unlikely that the asphalt and hardscape areas contain asbestos and just as unlikely that demolition would expose workers and nearby receptors to asbestos. Regardless, the Project would comply with BAAQMD Regulation 11, Rule 2, Asbestos, Demolition, Renovation, and Manufacturing. The purpose of this rule is to control emissions of asbestos to the atmosphere during demolition and building renovation. Because the Project Sponsor would be required to control asbestos emissions according to BAAQMD regulations, impacts associated with asbestos emissions would be less than significant.

Diesel Particulate Matter and Localized $PM_{2.5}$

Cancer risks associated with exposure to DPM are typically associated with chronic exposure (i.e., a 30-year exposure period). BAAQMD has determined that construction or operational activities occurring more than 1,000 feet from a sensitive receptor most likely do not pose a significant health risk. As stated previously, the closest sensitive receptors are the residences located approximately 700 feet south of the Project site. Accordingly, a health risk assessment (HRA) was undertaken to assess inhalation cancer risks, non-cancer hazard impacts, and $PM_{2.5}$ concentrations, as recommended in BAAQMD's CEQA Guidelines.

During construction activities, DPM and $PM_{2.5}$ exhaust emissions would be generated by heavy-duty off-road equipment as well as heavy-duty trucks. Fugitive $PM_{2.5}$ emissions would be generated from soil disturbance as well as workers' vehicles and heavy-duty trucks traveling on paved and unpaved roads. During operations, DPM and $PM_{2.5}$ exhaust emissions would be generated by heavy-duty delivery trucks and the two emergency generators. In addition, employee vehicles would generate $PM_{2.5}$ exhaust emissions. Fugitive $PM_{2.5}$ emissions would be generated by employee vehicles and heavy-duty delivery trucks traveling on paved roads. The two emergency generators would operate for approximately 15 minutes each month for maintenance testing. Each emergency generator would have a total operating time of 3 hours per year for maintenance testing.

The HRA was prepared consistent with guidance from EPA, the California Environmental Protection Agency, the Office of Environmental Health Hazard Assessment (OEHHA), and BAAQMD. More specifically, the HRA relied on EPA's most recent dispersion model, AERMOD (version 19191). Calculations of cancer risks and chronic non-cancer risks relied on the assessment values developed

from OEHHA's *Air Toxics Hot-spots Program, Risk Analysis Guidelines;*[18] BAAQMD's *Recommended Methods for Screening and Modeling Local Risks and Hazards*; [19] and BAAQMD's *Health Risk Assessment Modeling Protocol*.[20]

Two cancer risk scenarios were evaluated for the Project. Scenario 1 evaluates a receptor in the third trimester of pregnancy who is exposed to the full duration of construction, 2.10 years, and then 28.15 years of operations, for a total exposure duration of 30.25 years. Scenario 2 evaluates a receptor in the third trimester of pregnancy who is exposed to 30 years of operational emissions. Refer to Appendix B for more detailed modeling assumptions and AERMOD outputs.

Scenario 1: Construction plus Operations

Table 3-6 presents the health risks for maximally affected residential receptors. The evaluation of cancer risk was based on an exposure duration of 2.1 years for construction and 28.15 years for operations. For this scenario, the non-cancer hazard index and annual $PM_{2.5}$ concentrations were based solely on construction emissions. This is because annual DPM and $PM_{2.5}$ emissions were highest for construction activities in years that did not overlap with operations. As shown in Table 3-6, the unmitigated health risk results would be below all BAAQMD health risk thresholds. Therefore, unmitigated construction and operational emissions would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

Table 3-6. Estimated Project-Level Health Risk Results from Construction and Operations

Scenario	Cancer Risk (cases per million)[a]	Non-Cancer Hazard Index[b]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)[b]
Construction + Operations	2.0	0.002	0.02
BAAQMD Significance Threshold	10.0	1.0	0.3
Exceeds Threshold?	No	No	No

Notes: BAAQMD = Bay Area Air Quality Management District; $\mu g/m^3$ = micrograms per cubic meter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

[a] Evaluation of cancer risk was based on an exposure duration of 2.1 years for construction and 28.15 years for operations.

[b] Non-cancer hazard index and annual $PM_{2.5}$ concentrations were based solely on annual construction emissions.

Scenario 2: Operations Only

Table 3-7 presents the health risks for maximally affected residential receptors. As shown in Table 3-7, the unmitigated health risk results would be below all BAAQMD health risk thresholds. Therefore, unmitigated operational emissions would not expose sensitive receptors to substantial pollutant concentrations, and impacts would be less than significant.

[18] Office of Environmental Health Hazard Assessment. 2015. *Air Toxics Hot-spots Program, Risk Analysis Guidelines*. Guidance Manual for Preparation of Health Risk Assessments. Available: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed: March 30, 2021.

[19] Bay Area Air Quality Management District. 2012. *Recommended Methods for Screening and Modeling Local Risks and Hazards.* Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en. Accessed: March 30, 2021.

[20] Bay Area Air Quality Management District. 2020. *Health Risk Assessment Modeling Protocol*. December. Available: https://www.baaqmd.gov/~/media/files/ab617-community-health/facility-risk-reduction/documents/baaqmd_hra_modeling_protocol_august_2020-pdf.pdf?la=en. Accessed: March 30, 2021.

Table 3-7. Estimated Project-Level Health Risk Results from Operations Only

Scenario	Cancer Risk (cases per million)	Non-Cancer Hazard Index	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Operations Only	0.13	0.00003	0.004
BAAQMD Significance Threshold	10.0	1.0	0.3
Exceeds Threshold?	No	No	No

Notes: BAAQMD = Bay Area Air Quality Management District; $\mu g/m^3$ = micrograms per cubic meter; $PM_{2.5}$ = particulate matter no more than 2.5 microns in diameter

Cumulative Diesel Particulate Matter, $PM_{2.5}$ Exhaust, and Fugitive Dust

According to BAAQMD's CEQA Guidelines, combined risk levels should be determined for all TAC sources within 1,000 feet of a project site, and the combined risk levels should be compared to BAAQMD's cumulative health risk thresholds.[21]

Nearby TAC sources, as well as Project construction, could contribute to a cumulative health risk for sensitive receptors near the Project site. BAAQMD's inventory of stationary health risks and the distance multiplier tool[22,23] were used to estimate excess impacts from existing stationary sources. Geographic information system (GIS) raster files provided by BAAQMD were used to estimate roadway and railway source emissions.[24] The methods used to estimate Project-related TAC emissions are described above and in Appendix B. The results of the cumulative impact assessment are summarized in Table 3-8, which shows the maximally affected receptor values plus contributions from existing sources. The sum of these values were compared to BAAQMD cumulative thresholds. Individual background contributions from existing sources are included in Appendix B.

As shown in Table 3-8, below, the non-cancer chronic risk would be below cumulative thresholds. The cumulative cancer risk and $PM_{2.5}$ concentrations at the maximally affected receptors would exceed BAAQMD thresholds for cumulative impacts. However, it should be noted that the health risk values for existing background sources associated with cancer risk and annual $PM_{2.5}$ concentrations exceed the BAAQMD's cumulative thresholds without the Project's contributions. As shown in Table 3-8, the Project's contribution to health impacts for the maximally affected receptor would be nominal. Furthermore, according to the BAAQMD CEQA guidelines, if a project would exceed the project-level thresholds of significance, then the proposed project would result in a significant impact and a cumulatively considerable contribution. As shown in Table 3-6 and Table 3-7, the Project would not exceed BAAQMD's project-level thresholds of significance. Accordingly, the contribution of the Project's emissions would not be cumulatively considerable. This impact would be ***less than significant***.

[21] Bay Area Air Quality Management District. 2017. *California Environmental Quality Act Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: April 2021.

[22] Bay Area Air Quality Management District. 2020a. *Permitted Stationary Sources Risk and Hazards.* Available: https://baaqmd.maps.arcgis.com/apps/webappviewer/index.html?id=2387ae674013413f987b1071715daa65. Accessed: April 2021.

[23] Bay Area Air Quality Management District. 2020. *Health Risks Calculator Beta 4.0.* Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools. Accessed: April 2021.

[24] Winkel, Jackie. Principal environmental planner, Bay Area Air Quality Management District. April 12, 2018—email to Darrin Trageser, ICF, Sacramento, CA, regarding GIS files containing data on background health risks from railroads, major roads, and highway sources within BAAQMD jurisdiction.

Table 3-8. Maximum Unmitigated Cumulative Health Risks

Source[a]	Maximum Affected Residential Receptor		
	Cancer Risk (per million)	Non-Cancer Chronic Hazard Index[a]	Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)
Contribution from Existing Sources for Scenario 1			
Stationary	7.63	0.010	0.11
Roadway	90.15	0.000	1.75
Rail	12.97	0.000	0.02
Existing Total	**110.75**	**0.010**	**1.88**
Contribution from Project for Scenario 1			
Project Construction (2.10-year exposure duration)	1.95	0.002	0.02
Project Operations (28.15-year exposure duration)	0.04	—	—
Existing + Construction + Operations (cancer only)	112.75	—	—
Existing + Construction (chronic hazard index/annual $PM_{2.5}$)	—	0.012	1.90
BAAQMD Cumulative Thresholds	100	10.0	0.8
Exceeds Thresholds?	**Yes**	**No**	**Yes**
Contribution from Existing Sources for Scenario 2			
Stationary	7.63	0.01	0.11
Roadway	90.15	0.00	1.75
Rail	12.97	0.00	0.02
Existing Total	110.75	0.01	1.88
Contribution from Project for Scenario 2			
Project Operations (30-year exposure duration)	0.13	0.00	0.00
Existing + Operations	110.89	0.01	1.89
BAAQMD Cumulative Thresholds	100	10.0	0.8
Exceeds Thresholds?	**Yes**	**No**	**Yes**

Source: Modeling files provided in Appendix B.
Notes: BAAQMD = Bay Area Air Quality Management District; $\mu g/m^3$ = micrograms per cubic meter
[a] Data not available for chronic values from roadway and rails sources.
Exceedances denoted with underline.

d. Result in other emissions (such as those leading to odors) that would adversely affect a substantial number of people? (Less than Significant)

Although offensive odors rarely cause physical harm, they can be unpleasant, leading to considerable distress among the public. In addition, they often generate citizen complaints to local governments and air districts. According to CARB's *Air Quality and Land Use Handbook*, land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling

facilities, and manufacturing plants.[25] Odor impacts on residential areas and other sensitive receptors, such as hospitals, day-care centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas.

Odors during construction could be emitted from diesel exhaust, asphalt paving, and architectural coatings. However, construction activities near existing receptors would be temporary and would not result in nuisance odors that would violate BAAQMD Regulation 7. During operation, odors could emanate from vehicle exhaust, intermittent use of the backup generator during emergencies and maintenance testing, and the reapplication of architectural coatings. However, odor impacts would be limited to circulation routes, parking areas, and areas immediately adjacent to recently painted structures. Although such brief exhaust- and paint-related odors may be considered adverse, they would not affect a substantial number of people. Because the Project is not anticipated to result in substantial or long-term odors, the impact would be ***less than significant***.

[25] California Air Resources Board. 2005. *Air Quality and Land Use Handbook: A Community Health Perspective.* April. Available: https://ww3.arb.ca.gov/ch/handbook.pdf. Accessed: April 2021.

IV. Biological Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☒	☐
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e.	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f.	Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Setting

The Project site is completely developed and located within a predominantly developed and urbanized area. The site is bound by Airport Boulevard to the north, a parking lot to the west, and a shoreline made of artificial concrete and riprap to the south and east. Because the Project site is completely developed, it does not contain natural land cover or communities, protected wetlands/waters,[26] riparian habitat, or

[26] U.S. Fish and Wildlife Service. 2019. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: February 23, 2021.

other sensitive natural communities.[27] The onsite ornamental vegetation is not considered a sensitive natural community. No water features or waterways are on the Project site. Although the Project site is developed, some natural resource features are located nearby but outside the site. Undeveloped open space is located approximately 90 feet north of the Project site, across Airport Boulevard, and open deepwater habitat associated with the Bay is located just outside the eastern and southern boundaries of the site. In addition, Anza Lagoon and Robert E. Woolley State Park are approximately 0.11 and 0.2 mile northwest of the Project site, respectively. Fisherman's Park is approximately 0.2 mile northeast of the Project site.

This biological resources impact analysis is based on a desktop review and evaluation of the following sources:

- A California Department of Fish and Wildlife (CDFW) California Natural Diversity Database[28] (CNDDB) species list query for the Project site and a 1-mile buffer area;
- A California Native Plant Society (CNPS)[29] species list query for the U.S. Geological Survey San Mateo (3712253) 7.5-minute series quadrangle;
- A U.S. Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC)[30] query for the Project site;
- The USFWS National Wetland Inventory and U.S. Environmental Protection Agency data for the identification of waters and wetlands;[31, 32]
- Arbor Resources Tree Survey Report, Burlingame Bay, 555 and 577 Airport Boulevard, Burlingame, CA;
- The Burlingame 2040 General Plan Draft Environmental Impact Report;[33] and
- Google Earth for aerial imagery.[34]

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to biological resources. The following goals and policies from the Healthy People and Healthy Places Element were identified to reduce impacts on biological resources: Goal HP-5, Policy HP-5.1, Policy HP-5.2, Policy HP-5.3, Policy HP-5.4, Policy HP-5.5, Policy HP-5.6, Policy HP-5.7, Policy HP-5.8, Policy HP-5.9, Policy HP-5.10, Policy HP-

27 California Department of Fish and Wildlife. 2020. *California Sensitive Natural Communities*. September 9. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline. Accessed: February 26, 2021.

28 California Department of Fish and Wildlife. 2020. *California Natural Diversity Database RareFind Records Search.* RareFind Version 5. Available: https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data. Accessed: February 23, 2021.

29 California Native Plant Society. 2019. *Online Inventory of Rare and Endangered Plants of California*. Available: http://www.rareplants.cnps.org/advanced.html. Accessed: February 23, 2021.

30 U.S. Fish and Wildlife Service. 2019. *IPaC Species List.* Available: https://ecos.fws.gov/ipac/. Accessed: February 23, 2021.

31 U.S. Fish and Wildlife Service. 2019. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: February 23, 2021.

32 U.S. Environmental Protection Agency. 2020. *WATERS GeoViewer*. Available: https://www.epa.gov/waterdata/waters-geoviewer. Accessed: February 23, 2021.

33 City of Burlingame. 2018. *Burlingame 2040 General Plan Public Draft EIR*. Available: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/BurlingameGP_DEIR_FullDocument_06-28-2018.pdf. Accessed: February 23, 2021.

34 Google Earth Pro. 2019. Aerial imagery: 567 Airport Boulevard, 37°35'22.28"N and 122°20'29.34"W. Accessed: February 23, 2021.

5.11, Policy HP-5.12, Policy HP-5.13, Policy HP-5.14, and Policy HP-5.15. No one established regulation, goal, policy, or implementation measure would be expected to completely reduce or avoid an identified potential biological resources impact. However, the combined mitigating benefits of required regulations and policies listed in the Burlingame General Plan EIR would result in a less-than-significant biological resources impact at the programmatic level. No mitigation measures at the programmatic level are therefore warranted.

Discussion

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (Less than significant with mitigation)

Because the Project site is completely developed and no natural land cover or sensitive communities are present on the site or in the immediate vicinity, special-status species are not anticipated to occur on the site, with the exception of pallid bat (*Antrozous pallidus*) and peregrine falcon (*Falco peregrinus*), bats protected under state law (California Fish and Game Code Section 4150), and resident and migratory nesting birds protected under state law (California Fish and Game Code Sections 3503, 3503.5 and 3513) and federal law (e.g., migratory Bird Treaty Act). Queries of the CNDDB, CNPS, and IPaC regarding species with potential to occur in the region are included in Appendix C.

Delta smelt (*Hypomesus transpacificus*), a fish species designated as threatened by USFWS and endangered by CDFW, is not anticipated to occur in aquatic habitat near the Project site, including Sanchez Channel and Burlingame Lagoon because these locations are outside the known range of this species; the known range of delta smelt is restricted to the upper reaches of the Bay and Sacramento-San Joaquin Delta Estuary, from San Pablo Bay upstream to Sacramento on the Sacramento River and Mossdale on the San Joaquin River. However, there is potential for longfin smelt (*Spirinchus thaleichthys*), a fish species designated as threatened by CDFW, in Sanchez Channel and Burlingame Lagoon because these aquatic habitats are within the known range of the species. The Project would not result in direct impacts on longfin smelt because no aquatic habitat is located on the Project site; however, the potential exists for the Project to indirectly affect water quality in Sanchez Channel and Burlingame Lagoon. Indirect impacts on aquatic habitats could occur because of impacts on water quality.

As discussed in more detail in Section X, *Hydrology and Water Quality*, local drainage is managed by storm drain infrastructure. Stormwater runoff from the Project site drains to a pump station on the south side of the site where it is collected and pumped to Burlingame Lagoon. The Project would be required to comply with local and state regulations that call for implementation of best management practices to protect water quality during construction and operation. In addition, discharges from storm drains to surface waters would comply with waste discharge requirements.

Groundwater that fails to meet water quality standards would be treated prior to discharge or hauled offsite for treatment and disposal. Temporary dewatering is anticipated during construction; however, no permanent dewatering would be required during operation. Because there would be no direct impacts on longfin smelt and water quality would be protected with implementation of local and state regulations, the Project's impact on longfin smelt would be less than significant.

Other species listed in the queries have low or no potential to occur on the Project site because the site is outside their range, the site lacks habitat for the species, and/or the surrounding dense urban development acts as a barrier between potential habitat and the site.

Pallid bat is designated as a species of special concern by CDFW. Suitable foraging habitat occurs in open, natural land cover types, such as grasslands, shrublands, woodlands, and forests. For roosting, pallid bat prefers rocky outcrops, cliffs, and crevices with access to open habitats for foraging. Day roosts are in caves, crevices, mines, and occasionally in hollow trees and buildings; night roosts may be in more open sites, such as porches and open buildings. Although completely developed, the Project site has low to moderate potential for pallid bat and other non-special status bats (e.g., Mexican free-tailed bat [*Tadarida brasiliensis*] and Yuma myotis [*Myotis yumanensis*]), which are protected under state law (California Fish and Game Code Section 4150) because of the presence of potential onsite roosting habitat and nearby foraging habitat**.**

Potential onsite roosting habitat for bats includes large trees. Foraging habitat in proximity to the Project site includes the field north of the Project site, across Airport Boulevard; Burlingame Golf Center; Bayside Park; Anza Lagoon; Robert E Woolley State Park; Coyote Point Recreation Area; and Poplar Creek Golf Course. Bat occupancy within trees depends on tree size and the presence of cavities. If bats, including pallid bat, are present onsite and affected by construction activities, including tree removal associated with the Project that results in take (i.e., direct mortality, destruction of active nesting sites, disturbance of nesting adults and associated nest abandonment and/or loss of reproductive effort), a significant impact could occur.

Peregrine falcon is designated as fully protected by CDFW. Peregrine falcons normally nest in a scrape on a cliff ledge but also in snags, large vacant nests in trees, or on ledges, including those on buildings; pigeons are often favored prey around cities.[35] The buildings and trees within and surrounding the Project site may provide suitable nesting and roosting habitat for this species. In addition, open air in and around the Project site provides foraging habitat when prey is present. If nests for this species are present onsite or in the surrounding area and eggs, nestlings, or nesting individuals are harmed or killed during tree removal or substantially affected by construction noise or nighttime lighting during operation, a significant impact could occur.

The landscaping (e.g., shrubs and trees) and structures on or near the Project site offer suitable nesting habitat for migratory birds and raptors, which are protected under the Migratory Bird Treaty Act and California Fish and Game Code Section 3503. The Project would remove nesting and roosting habitat, including landscape vegetation and 155 trees within the Project site. If nests are present onsite or in the surrounding area and eggs, nestlings, or nesting individuals are harmed or killed during tree removal or substantially affected by construction noise or nighttime lighting during operation, a significant impact could occur.

Mitigation Measure BIO-1 would require pre-construction surveys for nesting birds, avoidance during the nesting period to the extent feasible, and avoidance of nesting birds found during the pre-construction surveys. Mitigation Measure BIO-2 would require pre-construction bat surveys prior to tree removal. Mitigation Measure NOI-1, which is discussed in more detail in Section XIII, *Noise*, would require implementation of noise reduction measures to minimize noise generated during construction; such measures would also serve to reduce potential impacts. Existing regulations, including the California Building Standards Code (Title 24, Building Energy Efficiency Standards)

[35] National Audubon Society. 2018. *Guide to North American Birds – Peregrine Falcon*. Available: https://www.audubon.org/field-guide/bird/peregrine-falcon. Accessed: February 25, 2021.

and Burlingame Municipal Code Section 18.16.030, require lighting designs to minimize impacts from light and glare. Implementation of Mitigation Measures BIO-1, BIO-2, and NOI-1, along with compliance with existing lighting regulations, would ensure that bats, including pallid bat, and resident or migratory birds, including peregrine falcon, would be protected. Therefore, impacts on special-status species would be ***less than significant with mitigation.***

Mitigation Measure BIO-1: Preconstruction Nesting Bird Surveys and Protection Measures

The Project Sponsor shall protect nesting birds and their nests during construction through implementation of the following measures:

- Construction shall avoid the avian nesting period (February 1 through August 31) to the extent feasible.
- If construction occurs during the bird nesting season, a qualified wildlife biologist* shall conduct a nesting bird preconstruction survey within 7 days prior to the start of construction at areas that have not been previously disturbed by Project activities or after any construction breaks of 10 days or more. The survey shall be performed within a radius of 100 feet and 500 feet of the construction area to locate any active nests of passerine and raptor (including peregrine falcon) species, respectively, and shall be in those areas that constitute suitable habitat for the species.
- If active nests are located during the preconstruction nesting bird survey, a qualified biologist shall determine if the schedule of construction activities could affect active nests; if so, the following measures shall apply:
    - If the qualified biologist determines that construction is not likely to affect an active nest, construction may proceed without restriction; however, a qualified biologist shall regularly monitor the nest at a frequency determined appropriate for the surrounding construction activity to confirm there is no adverse effect. Spot-check monitoring frequency shall be determined on a nest-by-nest basis, considering the particular construction activity, duration, proximity to the nest, and physical barriers that may screen activity from the nest.
    - If it is determined that construction may cause a direct impact or abandonment of an active nest, the qualified biologist shall establish a no-disturbance buffer around the nest(s), and all Project work shall halt within the buffer to avoid disturbance or destruction until a qualified biologist determines that the nest is no longer active. Typically, buffer distances are a minimum of 50 feet for passerines, 250 feet for raptors, and 500 feet for peregrine falcons; however, the buffers may be decreased if an obstruction, such as a building, is within the line of sight between the nest and construction.
    - Modifying nest buffer distances, allowing certain construction activities within the buffer, and/or modifying construction methods in proximity to active nests shall be approved by the qualified biologist and in compliance with the California Fish and Game Code and other applicable laws.
    - Any work that must occur within established no-disturbance buffers around active nests shall be monitored by a qualified biologist. If adverse effects in response to Project work within the buffer are observed and could compromise the nest, work within the no-disturbance buffer(s) shall halt until the nest occupants have fledged.

- Any birds that begin nesting within the Project site and survey buffers amid construction activities are assumed to be habituated to construction-related or similar noise and disturbance levels. Work may proceed around these active nests, subject to the measure above that begins with "Modifying nest buffer distances…"

*The experience requirements for a "qualified biologist" shall include a minimum of 4 years of academic training and professional experience in biological sciences and related resource management activities and a minimum of 2 years of experience from conducting nesting-bird surveys.

Mitigation Measure BIO-2: Pre-construction Bat Surveys

The Project Sponsor shall protect bats during construction by implementation of the following measures:

- A qualified wildlife biologist (i.e., experienced with roosting habitats in trees and the life histories of local bats) shall examine trees for suitable bat roosting habitat (e.g., large tree cavities, basal hollows, loose or peeling bark, large snags, palm trees with intact thatch) prior to removal or trimming. Trees that provide suitable or potentially suitable bat habitat shall be flagged and identified as habitat. Because of the limited timeframe for tree removal (September 15 to October 31), the tree habitat assessment should be conducted early to provide information for tree removal planning. Riparian woodlands, orchards, and stands of mature broadleaf trees are considered potential habitat for solitary foliage-roosting bat species. Because signs of bat use are not easily found, and because trees cannot be completely surveyed for bat roosts, the protective measures listed below shall be implemented for trees that contain potential roosting habitat.
- Removal or disturbance of trees that provide bat roosting habitat shall be avoided between April 1 and September 15 (the maternity period) to avoid effects on pregnant females and active maternity roosts (whether colonial or solitary).
- Removal of trees providing bat roosting habitat shall be conducted between September 15 and October 31, which corresponds to the time period when bats have not yet entered torpor or begun caring for nonvolant young.
- If a maternity roost is found, whether solitary or colonial, that roost shall remain undisturbed until September 15 or until a qualified biologist has determined that the roost is no longer active. The qualified biologist shall determine the extent of suitable no-work buffers around roost and/or hibernaculum sites. Buffer distances may vary, depending on the species and activities being conducted.
    - Removal of trees (September 15 to October 31) that provide suitable roosting habitat shall be monitored by qualified biologists. Trees that provide suitable habitat for bats shall be trimmed and/or removed in a two-phase removal process conducted over two consecutive days. In the afternoon on the first day, limbs and branches shall be removed by a tree cutter, using chainsaws only. Limbs with cavities, crevices, or deep bark fissures shall be avoided, and only branches or limbs without those features shall be removed. On the second day, the entire tree shall be removed. Biologists shall search downed vegetation for dead and injured bats. The presence of dead or injured bats that are species of special concern shall be reported to CDFW. The biologist shall prepare a biological monitoring report, which shall be provided to the Project lead, sponsor, and CDFW.

The loss of occupied roosting habitat shall be mitigated by constructing and/or installing suitable replacement habitat on the Project site. Suitable replacement habitat could include a bat house mounted on a pole or on the side of a building or structure at least 10 feet off the ground to protect it from predators. Bat houses are usually made of wood or a combination of wood and other materials (e.g., metal and plastic) and vary in size. Bat Conservation International recommends that bat houses be at least 24 inches high and 16 inches wide.[36] Existing and new buildings as well as landscaped areas on the Project site afford ample opportunities for placement of a bat house.

Placement and installation methods for replacement habitat shall be designed so as not to affect riparian habitats or other sensitive natural communities or state or federally protected wetlands. In addition, the installation of replacement habitat shall avoid the avian nesting period (February 1 through August 31) to the extent feasible. If not, Mitigation Measure BIO-1 shall be implemented prior to installation. A roosting habitat design and monitoring plan shall be developed in coordination with CDFW. The roosting habitat shall be monitored to ensure it functions as intended.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? (Less than significant)

No riparian habitat or other sensitive natural community is present on the Project site or in the immediate vicinity. The trees and landscaping on the Project site are not considered a sensitive natural community. The closest areas with potential for sensitive natural communities are the undeveloped open spaces approximately 90 feet north of the Project site, across Airport Boulevard, and the wetland habitat associated with Burlingame Lagoon, approximately 0.12 mile southwest of the Project site.[37]

The Project would not result in any direct impacts on sensitive natural communities; however, indirect impacts on potential sensitive natural communities could occur because of impacts on water quality. Refer to Impact IVa, above, for an explanation of how water quality would be protected. Because there would be no direct impacts on sensitive natural communities and water quality would be protected through compliance with local and state regulations, the Project's impact on sensitive natural communities would be ***less than significant***.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal wetlands, etc.) through direct removal, filling, hydrological interruption, or other means? (Less than significant)

No federally protected wetlands or other jurisdictional waters area present on the Project site. The nearest jurisdictional waters to the Project site are Sanchez Channel and Burlingame Lagoon, which are east and south of the Project site, respectively. The channel and lagoon, which are classified as estuarine and marine deepwater habitat, are connected; they open directly to the Bay northeast of the Project site.[38] A wetland that has been classified as estuarine and marine

[36] Bat Conservation International. 2021. *Bat Houses*. Available: https://www.batcon.org/about-bats/bat-houses/. Accessed: March 19, 2021.

[37] U.S. Fish and Wildlife Service. 2019. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: February 23, 2021.

[38] Ibid.

wetland habitat and associated with Burlingame Lagoon is approximately 0.12 mile southwest of the Project site. In addition, freshwater emergent wetland habitat is located north of Airport Boulevard. Anza Lagoon, which has been classified as freshwater pond habitat, is northwest of the Project site.[39] Because the Project site is relatively flat and separated from Anza Lagoon by urban development, including paved roads and parking lots, the Project would have no impact on Anza Lagoon.

The Project would not result in any direct impacts on Sanchez Channel, Burlingame Lagoon, wetland habitat associated with Burlingame Lagoon, or wetland habitat north of Airport Boulevard; however, the potential exists for the Project to indirectly affect water quality. Refer to Impact IVa, above, for an explanation of how water quality would be protected. Because there would be no direct impacts on jurisdictional waters and wetlands, and because water quality would be protected through compliance with local and state regulations, the Project's impact on potentially protected wetlands would be ***less than significant***.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites? (Less than significant with mitigation)

No wetlands or running waters are present on the Project site; therefore, the Project would not affect fish movement. All Project activities would occur within an already-developed footprint. The Project would not involve the construction of permanent fences; therefore, the Project would not result in fragmentation within natural habitats that would interfere with the movement of wildlife. Any common urban-adapted species that currently move through the Project site would continue to be able to do so following construction. Should non-nesting birds be on the Project site when disturbance occurs, they could readily vacate the site and relocate to other areas.

Wildlife corridors are described as pathways or habitat linkages that connect discrete areas of natural open space that would otherwise be separated or fragmented by topography, changes in vegetation, or other natural or man-made obstacles, such as urbanization. The Project site does not occur between areas of natural open space; open space is located only north of the Project site, across Airport Boulevard. Nonetheless, the Project site is within the Pacific Flyway, a bird migratory route, and the likelihood exists for trees on the Project site to be used by migratory birds. In addition, the likelihood exists for trees on the Project site to be used by bats and birds as a nursery site. If the Project interferes substantially with the movement of wildlife or impedes the use of native wildlife nursery sites, a significant impact could occur.

As described in Impact IVa, above, impacts on bats and nesting birds, including migratory birds, would be minimized through implementation of Mitigation Measures BIO-1, BIO-2, and NOI-1 and compliance with existing lighting regulations, which require pre-construction surveys for bats and nesting birds, avoidance of the nesting period to the extent feasible, avoidance of nesting bats and birds found during pre-construction surveys, measures to reduce lighting impacts, and measures to reduce noise impacts. The impact on bats and migratory birds due to construction would be less than significant with mitigation. However, operation of the Project would include new lighting and a new vertical structure with potentially reflective surfaces. The new lighting and the new surfaces on the building could misdirect or confuse migratory birds, resulting in disruption with respect to natural behavioral patterns and possible injury or death from exhaustion or collisions

[39] Ibid.

with buildings. The potential for these types of impacts could be heightened because of the Project's location within the Pacific Flyway and proximity to the Bay. Impacts on migratory birds from proposed buildings and increased lighting levels would be potentially significant. Mitigation Measure BIO-3 would require implementation of design standards that would reduce hazards for birds. The impact on migratory birds due to operation of the Project would be ***less than significant with mitigation***.

Mitigation Measure BIO-3: Implement Bird-safe Design Standards in Project Buildings and the Lighting Design

The applicant, or contractor, shall implement the following measures to minimize hazards for birds:

- Reduce large areas of transparent or reflective glass;
- Locate water features, trees, and bird habitat away from building exteriors to reduce reflection;
- Reduce or eliminate the visibility of landscaped areas behind glass;
- Turn non-emergency lighting off at night, especially during bird migration season (February–May and August–November);
- Include window coverings that adequately block light transmission from rooms where interior lighting is used at night and install motion sensors or controls to extinguish lights in unoccupied spaces; and
- Design and/or install light fixtures that minimize light pollution, including light trespass, over-illumination, glare, light clutter, and skyglow, and use bird-friendly colors for lighting when possible. The City of San Francisco's *Standards for Bird-safe Buildings*[40] provides an overview of building design and lighting guidelines to minimize bird/building collisions that could be used to guide the applicant.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? (Less than significant with mitigation)

Burlingame Municipal Code Section (11.06.020) defines a "protected tree" as any tree with a circumference of 48 inches or more when measured 54 inches above natural grade. A total of 303 trees were documented on the Project site (Appendix C). Construction of the Project would preserve 148 trees and require the removal of 155 trees, 17 of which have a circumference greater than 48 inches when measured 54 inches above the existing grade and therefore are considered protected trees. The remaining 138 trees that would require removal are not considered protected trees because of their smaller size.

The protected trees to be removed include Fremont cottonwood, blackwood acacia, London plane tree, and Japanese maple. The applicant shall abide by all conditions specified in the Burlingame Municipal Code, which requires the applicant to obtain permits before removing protected trees and compensate for the removal of protected trees. To compensate for the removal of protected trees, the Burlingame Municipal Code (Section 11.06.090) requires trees to be planted at a ratio of 3:1 when using 15-gallon trees, 2:1 when using 24-inch trees, and 1:1 when using 36-inch trees.

[40] City and County of San Francisco. 2011. *Standards for Bird-safe Buildings*. San Francisco Planning Department. July 14. Available: http://www.sf-planning.org/ftp/files/publications_reports/bird_safe_bldgs/Standards_for_Bird_Safe_Buildings_7-5-11.pdf. Accessed: February 26, 2018.

Plantings at the Project site would include 15-gallon trees with a mixture of 24-, 36-, and 48-inch sizes. A total of 251 new trees would be planted as a part of the Project, thereby exceeding the replacement requirements of the Burlingame Municipal Code.

The City has not adopted any ordinance or other guidance for regulating the design of structures to be "bird safe," as some larger Bay Area municipalities (such as San Francisco and Oakland) have done. The decision to develop and adopt such guidance is left to individual municipalities; the State of California does not require the design of buildings to be bird safe. However, the General Plan includes Goal CC-1.14, which states that, for projects in the Bayfront area, the development review process should ensure that projects are designed to promote bird safety to minimize adverse effects on native and migratory birds. Implementation of Mitigation Measure BIO-3, as outlined above, would ensure that implementation design standards would reduce hazards for migratory birds. Therefore, the Project would not conflict with any local policies or ordinances that protect biological resources. Impacts would be ***less than significant with mitigation***.

f. Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan? (No Impact)

The Project site is not part of or near an adopted or proposed habitat conservation plan (HCP) or natural community conservation plan (NCCP) or any other local, regional, or state HCP. The nearest area covered by an HCP is the San Bruno Mountain HCP, which is more than 6 miles northwest of the Project site. Therefore, the Project would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP, and ***no impact*** would occur.

V. Cultural Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b.	Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c.	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

Setting

The Project site is near the eastern edge of Burlingame, approximately 500 feet south of San Francisco Bay and 3 miles southeast of San Francisco International Airport. The geologic setting in the vicinity of the Project site has been dramatically altered over time. The area was within tidal marshes until the 1960s. The underlying landform of the tidal marshes is Holocene and generally considered sensitive for archaeological material. Tidal marshes were important resource collection areas for the native people of the Bay Area and often associated with human occupation. The presence of freshwater streams, shore birds, and marine resources makes tidal marshes rich in dietary material.

The original Bayshore Highway (now US 101) was constructed south of the Project site during the 1930s, although the Project site itself was not created until a campaign of land reclamation began during the 1960s. Historic maps depict the area as mostly marshland in 1968 and as dry land by 1973.[41] During this time, excavated material was used to fill the marshes and create a more stable base for development.[42] After 1973, aerial photographs show the area experiencing growth, and by 2000, it was completely developed. The presence of prehistoric and historic nearshore tidal marshes and Holocene-age landforms indicates increased sensitivity for archaeological materials.

The Project site currently contains two buildings at 555 Airport Boulevard and 577 Airport Boulevard. Both buildings are within the same legal parcel (assessor's parcel number [APN] 026-363-590), with an assessor-assigned construction date of 1986. However, a review of aerial photographs found that the building at 555 Airport Boulevard did not appear until after 1993.

The Project site is adjacent to parcels with three buildings, 533 Airport Boulevard (APN 026-363-250, constructed in 1977), 433 Airport Boulevard (APN 026-363-580, constructed in 1975); and 411 Airport Boulevard (APN 026-363-290, constructed between 1980 and 1982). Therefore, the Project site neither contains nor is adjacent to any built-environment resource that has reached the age at which such

[41] U.S. Geological Survey. 1968, 1973. *San Mateo Topographic Quadrangle Map*. Reston, VA. Accessed: July 25, 2018.

[42] Pampeyan, E.H. 1994. *Geologic Map of the Montara Mountain and San Mateo 7.5-minute Quadrangles, San Mateo County, California.* U.S. Geological Survey.

resources typically qualify for listing in the California Register of Historical Resources (CRHR).[43] Furthermore, none of the buildings appears to have any past survey evaluation or designation that would qualify it as a significant historical resource for the purpose of CEQA review.[44]

ICF archaeologist Lily Arias conducted a review of existing literature in the California Historical Resources System at the Northwest Information Center (NWIC) on February 11, 2021. During the review, the Project site, as well as a 0.5-mile buffer, was examined to identify archaeological resources or previously conducted cultural resource studies. One previously conducted cultural resource study was found that covered the Project site; 21 previously conducted cultural resource studies were found that covered areas within 0.5 mile of the Project site. Of the 21 studies, seven were archaeological field studies, three were archaeological studies with test excavations, seven were field studies that included both archaeological and architectural resources, and four were field studies that pertained to historical architecture. Table 3-9 identifies the previously conducted cultural resource study.

Table 3-9. Previously Conducted Cultural Resource Studies within the Project Site

Study Number	Author	Date	Title
S- 038684	Stacy Kozakavich and Alexandra Merritt-Smith	2008 (Oct.)	A Cultural Resources Study for the San Mateo County SMART Corridors Project, San Mateo County, California

No previously recorded archaeological resources were identified within the Project site or within 0.5 mile of the Project site. Twenty built-environment resources were identified within 0.5 mile of the Project site.

Native American Correspondence

To identify tribal cultural resources within the Project area, the Native American Heritage Commission (NAHC) was contacted on January 27, 2021, and asked to provide a list of California Native American tribes that are geographically affiliated with the Project site. A search of the NAHC's Sacred Land File (SLF) was also requested. On February 8, 2021, the NAHC responded with a list of eight individuals for consultation; the search of the SLF was negative. Letters with Project details, a location map, and a request for consultation were sent on February 23, 2021, to the following individuals:

- Tony Cerda, Chairperson – Costanoan Rumsen Carmel Tribe
- Charlene Nijmeh, Chairperson – Muwekma Ohlone Tribe of the San Francisco Bay Area
- Monica Arellano – Muwekma Ohlone Tribe of the San Francisco Bay Area
- Andrew Galvan – The Ohlone Indian Tribe
- Kanyon Sayers-Roods, Most Likely Descendant Contact – Indian Canyon Mutsun Band of Costanoan Ohlone People

[43] Fifty years serves as the threshold above which a built-environment resource (e.g., building, structure, object, district) typically has the potential to meet the eligibility requirements of the CRHR and require an evaluation for CRHR listing.

[44] ParcelQuest. n.d. *Detail Reports for 555 Airport Boulevard, 533 Airport Boulevard, and 433 Airport Boulevard, Burlingame, California.* Available: www.parcelquest.com. Accessed: January 21, 2021; Nationwide Environmental Title Research, LLC. n.d. *Historic Aerial Photographs of Burlingame, California, 1980, 1982, 1993*. Available: https://www.historicaerials.com/. Accessed: January 21, 2021.

- Ann Marie Sayers, Chairperson – Indian Canyon Mutsun Band of Costanoan Ohlone People
- Irenne Zwierlein, Chairperson – Amah Mutsun Tribal Band of Mission San Juan Bautista
- Dee Dee Ybarra, Chairperson – Rumšen Am:a Tur:ataj Ohlone

Follow-up phone calls were made on April 7, 2021. Kanyon Sayers-Roods, chairperson of the Indian Canyon Mutsun Band of Costanoan Ohlone People, requested that there be both a Native American monitor and archaeological monitor when excavations take place and that cultural sensitivity training be offered at the beginning of the Project. Irenne Zwierlein asked that cultural sensitivity training be offered at the beginning of the Project and that an archaeologist and Native American monitor be called to the site if any Native American archaeological finds are discovered. Dee Dee Ybarra asked that cultural sensitivity training be offered at the beginning of the Project.

To date, no Native American resources have been identified within the Project site. Consultation is ongoing, and consultation records will be updated as necessary. In addition, the records search conducted at the NWIC did not identify any cultural resources within the Project area. Documentation of tribal consultation is included in Appendix D.

Burlingame General Plan EIR

The Burlingame General Plan EIR concluded that no one goal, policy, or implementation measure would be expected to completely avoid or reduce an identified potential impact on cultural resources. However, compliance with existing regulations and policies, including those outlined in the Burlingame General Plan, would reduce impacts to less than significant. The following goals and policies from the Community Character Element would reduce impacts on cultural resources: Goal CC-3, Policy CC-3.1, Policy CC-3.3, Policy CC-3.4, Policy CC-3.5, Policy CC-3.6, Policy CC-3.7, Policy CC-3.8, Policy CC-3.9, Policy CC-3.10, and Policy CC-3.11.

Discussion

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5? (No Impact)

The Project site (APN 026-363-590) neither contains nor is adjacent to any built-environment resource that qualifies as a historical resource for the purposes of CEQA. Therefore, new development on the Project site would not have the potential to cause a substantial adverse change to the significance of any built-environment historical resource, as defined in Section 15064.5 of the CEQA Guidelines. The Project would not demolish a significant historical resource or alter its physical characteristics, nor would it change elements within the historic setting of such a resource. Therefore, the Project would have ***no impact*** on built-environment historical resources.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5? (Less than Significant with Mitigation Incorporated)

No archaeological resources were identified on the Project site or within 0.5 mile of the Project site during the literature review conducted at the NWIC. However, the Project site is in an area that has some potential for encountering as-yet unknown archaeological resources. As stated previously, the Project site is in an area that was previously a tidal marsh and an important resource collection area for the native tribes of the Bay Area. The archaeological and historical contexts of the Project site, combined with its Holocene-age soils, indicate some sensitivity for subsurface archaeological

deposits. The Project site, which has been developed, is in an area with known imported fill, which is between 6 and 10 feet deep and underlain by 2 to 4 feet of younger Bay Mud. Beneath this are interbedded layers of dense sand and stiff clay. With construction expected to reach of a depth of 10 to 12 feet, some of the deeper ground-disturbing activities have the potential to affect intact and as-yet undocumented archaeological resources during construction. Therefore, the Project has the potential to affect as-yet unknown prehistoric and historic archaeological resources. Such resources may be eligible for listing in the CRHR. If such resources were to be destroyed by Project-related activities, the impact would be significant. Implementation of Mitigation Measure CUL-1 would require construction work to stop if an archeological material or feature is encountered during ground-disturbing activities. Mitigation Measure CUL-1 would also require proper treatment of any archeological resources that are found during construction. Implementation of Mitigation Measure CUL-1 would ensure that impacts on as-yet unknown cultural resources would be avoided and minimized, resulting in a ***less-than-significant impact after mitigation***.

Mitigation Measure CUL-1: Stop Work if Archaeological Material or Features Are Encountered during Ground-disturbing Activities

The applicant shall retain a professional archaeologist to provide a preconstruction briefing to supervisory personnel of any excavation contractor and alert them to the possibility of exposing significant prehistoric archaeological resources within the Project site. During the briefing, the archaeologist shall discuss archaeological objects that could be exposed, the need to stop excavation at the site of the discovery, and the procedures to follow regarding protection of the discovery and notification of the Project Sponsor and archaeological team. An "Alert Sheet" shall be posted in conspicuous locations at the Project site to alert personnel to the procedures and protocols to follow regarding the discovery of potentially significant prehistoric archaeological resources.

In the event that archaeological resources are encountered during construction, work shall halt within at least 100 feet of the discovery and the area avoided until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. If the find is determined to be potentially significant, the archaeologist, in consultation with the Native American representative, shall develop a treatment plan, which could include site avoidance, capping, or data recovery.

c. Disturb any human remains, including those interred outside of dedicated cemeteries? (Less than Significant with Mitigation Incorporated)

Although no isolated human remains, cemeteries, or archaeological resources that contain human remains were identified within the Project site during the literature review at the NWIC, the potential exists for previously undiscovered human remains to be encountered during Project demolition or construction. Buried deposits may be eligible for listing in the CRHR; therefore, this impact would be potentially significant. Implementation of Mitigation Measure CUL-2 would require construction work to stop if human remains are encountered during ground-disturbing activities and proper procedures regarding notification followed, per Section 50977.98 of the Public Resources Code and Section 7050.5 of the State Health and Safety Code. Implementation of Mitigation Measure CUL-2 would ensure that impacts on human remains would be minimized, resulting in a ***less-than-significant impact after mitigation***.

Mitigation Measure CUL-2: Stop Work if Human Remains Are Encountered during Ground-disturbing Activities

If human remains are unearthed during construction, pursuant to Section 50977.98 of the Public Resources Code and Section 7050.5 of the State Health and Safety Code, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains. The county coroner shall be informed to evaluate the nature of the remains. If the remains are determined to be of Native American origin, the Lead Agency shall work with the NAHC and the Project Sponsor to develop an agreement for treating or disposing of the human remains.

VI. Energy

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b.	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Setting

Electricity

Grid electricity and natural gas service in Burlingame is provided by Pacific Gas and Electric Company (PG&E) and Peninsula Clean Energy (PCE). PG&E is a publicly traded utility that generates, purchases, and transmits energy under a contract with the California Public Utilities Commission. PG&E's service territory covers 70,000 square miles, extending north to south from Eureka to Bakersfield and east to west from the Sierra Nevada to the Pacific Ocean. PG&E's electricity distribution system consists of 106,681 circuit miles of electric distribution lines and 18,466 circuit miles of interconnected transmission lines.[45] PG&E electricity is generated by a combination of sources, such as hydropower, gas-fired steam, and nuclear energy as well as newer sources as wind turbines and photovoltaic plants, or "solar farms." "The Grid," or "bulk electric grid," is a network of high-voltage transmission lines that link power plants to substations. The distribution system, composed of lower-voltage secondary lines, is at the street and neighborhood level. It consists of overhead or underground distribution lines, transformers, switching equipment, and service "drops" that connect to the individual customer.[46]

The City of Burlingame is part of PCE, which distributes additional renewable power to the region. Through PCE's community-choice energy (CCE) program, residents and businesses are able to choose where their energy comes from. CCE programs allow local governments to pool the electricity demands of their communities, purchase power with higher renewable content, and reinvest in local infrastructure. Currently, PG&E delivers the power, maintains the lines, and bills customers, but the power is purchased through the CCE program from renewable energy sources such as solar, wind, hydroelectric, geothermal, and biomass.[47]

[45] Pacific Gas & Electric. 2021. *Company Profile*. Available: https://www.pge.com/en_US/about-pge/company-information/profile/profile.page. Accessed: January 27, 2021.

[46] Pacific Gas & Electric. 2021. *PG&E's Electric System*. Available: https://www.pge.com/includes/docs/pdfs/shared/edusafety/systemworks/electric/pge_electric_system.pdf. Accessed: January 27, 2021.

[47] Peninsula Clean Energy. 2015. *Community Guide*. Available: https://www.peninsulacleanenergy.com/wp-content/uploads/2015/10/PCE_community_guide_v2_web.pdf. Accessed: January 27, 2021.

Natural Gas

Gas delivered by PG&E originates in California, the Southwest, the Rocky Mountains, and Canada. PG&E's natural gas (methane) delivery system includes 6,700 miles of transmission pipelines and 42,000 miles of distribution pipelines. The large transportation pipelines, which are under high pressure, send natural gas from gas fields and storage facilities. The smaller distribution pipelines deliver gas to individual businesses and residences. PG&E's gas pipelines serve approximately 15 million customers in California. The system is operated under an inspection-and-monitoring program in real time on a 24-hour basis. Under the program, PG&E inspects for leaks, conducts surveys, and patrols the pipelines.[48]

Burlingame General Plan EIR

The Burlingame General Plan EIR prepared an energy conservation analysis pursuant to Public Resources Code Section 2100(b)(3) and Appendix F of the CEQA Guidelines. Implementation of the Burlingame General Plan could increase VMT and energy usage. However, increased density, as proposed under this plan, would provide for more efficient use of resources in the city, ensuring that development would not result in the wasteful or inefficient use of energy resources. Impacts would be less than significant, and no mitigation measures are warranted.

The Healthy People and Healthy Places Element, the Community Character Element, and the Infrastructure Element include the following goals and policies that encourage energy efficiency: Policy HP-2.4, Policy HP-2.5, Policy HP-2.6, Policy HP-2.7, Policy HP-2.8, Policy HP-2.9, Policy HP-2.10, Policy HP-2.13, Policy HP-2.14, and Policy HP-2.15; Policy HP-6.2, Policy HP-6.4, and Policy HP-6.8; Goal CC-1, Policy CC-1.2, Policy CC-1.3, Policy CC-1.4, Policy CC-1.5, Policy CC-1.6, Policy CC-1.7, CC-1.9, Policy CC-1.12, and Policy CC-1.13; Policy IF-2.1 and Policy IF-2.12; Policy IF-5.3, Policy IF-5.5, Policy IF-5.7, Policy IF-5.12, Policy IF-5.15, and Policy IF-5.16; and Goal IF-6, Policy IF-6.7.

Discussion

a. Result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? (Less than Significant)

Construction

Project construction activities would require the use of trucks and other types of heavy equipment that, at present and for the foreseeable future, operate on fossil fuels. Construction activities are expected to require truck trips between the Project site and the Dumbarton Quarry facility and/or the Newby Island Landfill, both of which are within 35 miles of the site, to dispose of demolished materials and excavated soil. In addition to haul trucks, Project construction would require the use of diesel-powered equipment, including, but not limited to, an excavator, water truck, loader, and dump truck.

Emissions generated during construction of the Project would result primarily from the use of diesel-powered construction equipment. In addition, the Project would be required to implement relevant policies from the City's Climate Action Plan. The policies are geared toward reducing

[48] Pacific Gas & Electric. 2021. *Learn about the PG&E Natural Gas System*. Available: https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/natural-gas-system-overview.page. Accessed: January 27, 2021.

construction-related GHG emissions, which would consequently result in reductions in energy use as well. This is discussed further in Section VIII, *Greenhouse Gas Emissions*. Construction emissions would cease once construction of the Project is complete; therefore, such emissions would be considered short term. Construction would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. The impact would be ***less than significant***.

Operation

The Project would consume energy (e.g., electricity) to support normal day-to-day operations associated with proposed office uses. Vehicles, including mass-transit vehicles, used by employees and visitors/guests when traveling to and from the Project site would require energy in the form of gasoline, diesel, natural gas, and/or electricity. The specific fuel required for transport would depend on the mode of transportation and type of engine used to propel the vehicle.

The Project would implement TDM measures to reduce the number of trips generated by the Project (see *Transportation Impact Analysis* in Appendix E). The TDM measures would be implemented consistent with the City 2030 Climate Action Plan (see Section VIII, *Greenhouse Gas Emissions*) and C/CAG of San Mateo County requirements. The goal of the TDM program is to reduce the number of trips by 20 percent, consistent with the City's Climate Action Plan. Specific measures to be included in the plan could include dedicated peak-period shuttle service to/from Bay Area Rapid Transit (BART) and Caltrain facilities and subsidized transit passes for at least 25 percent of employees. Other TDM measures could include alternative work schedules/telecommuting, a guaranteed emergency ride-home program, a "buddy" program for cyclists and pedestrians, trip planning, bicycle parking, preferential parking spaces, and a catalog of available transportation services, bicycle routes, bike-share facilities, and transit/shuttle services. In addition, Commute.org, which operates a shuttle service to the Bayfront area, has a shuttle stop directly across from the Project site.

Energy would also be required to heat and cool the proposed building, provide indoor and outdoor lighting, and convey water/wastewater. The Project would be within the PG&E service territory for electricity and natural gas distribution. Because of the Project's size and location within an urban setting, and because PG&E continues to expand its renewable energy portfolio, buildout of the Project would not significantly increase energy demand within the service territory and would not require new energy facilities. Furthermore, energy projections from energy providers within the state anticipate growth from development such as the Project.

The Project would be required by law to adhere to California Code of Regulations (CCR) Title 24, the California Green Building Standards Code (CALGreen), as well as adopted City energy conservation ordinances and regulations. Unless otherwise noted, all newly constructed buildings in California, such as the building proposed as part of the Project, are subject to the requirements of CALGreen, which contains both mandatory and voluntary measures. For non-residential land uses, there are several mandatory measures, including, but not limited to, measures involving reductions in exterior light pollution, the use of water-conserving plumbing fixtures and fittings, recycling, and efficient heating, ventilation, and air-conditioning (HVAC) systems. In addition, the Project would meet the requirements for Leadership in Energy and Environmental Design (LEED) certification at the silver level.

As part of the City's approval process, the Project would be required to comply with existing regulations, including zoning regulations that promote efficiency by requiring sustainable building practices. Furthermore, the Project would be required to implement relevant policies from the City's

Climate Action Plan that are geared toward reducing operational GHG emissions, which would consequently result in reductions in energy use as well. This is discussed further in Section VIII, *Greenhouse Gas Emissions*. Accordingly, with implementation of adopted state and City energy conservation measures, the Project would result in a ***less-than-significant*** impact with respect to the wasteful, inefficient, or unnecessary consumption of energy resources.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? (Less than Significant)

The Project would be required to use energy-efficient building materials and construction practices, in accordance with CALGreen and Section 18.30 of the Burlingame Municipal Code, which contains the Green Building Standards Code. The Project would also use modern appliances and equipment, in accordance with the 2006 Appliance Efficiency Regulations (CCR Title 20, Sections 1601 through 1608). Per these requirements, the Project would use recycled construction materials; environmentally sustainable building materials; designs that would reduce the amount of energy used in building heating and cooling systems, compared with conventional structures; and landscaping that would incorporate water-efficient irrigation systems, all of which would conserve energy. Furthermore, the Project would be designed to achieve a minimum LEED rating of silver.

The Burlingame General Plan contains goals, policies, and programs that require local planning and development decisions to consider impacts on energy resources. The Project would adhere to Burlingame General Plan goals and policies to support energy conservation efforts and minimize potential impacts associated with energy use. As part of the City's approval process, the Project would be required to comply with existing regulations, including zoning regulations that promote energy conservation and efficiency by requiring sustainable building practices and reducing automobile dependency. Furthermore, implementation of the City's Climate Action Plan and compliance with CALGreen, as well as other applicable state and local energy efficiency measures, would save both energy and money. Refer to Section VIII, *Greenhouse Gas Emissions,* for an additional discussion regarding the Project's consistency with regulations related to sustainability. The Project would result in a ***less-than-significant*** impact with respect to conflicts with a state or local plan regarding renewable energy and energy efficiency.

VII. Geology, Soils, and Paleontological Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
	1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
	2. Strong seismic ground shaking?	☐	☐	☒	☐
	3. Seismically related ground failure, including liquefaction?	☐	☐	☒	☐
	4. Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e.	Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

Setting

Burlingame is in the Coast Ranges geomorphic province, in eastern San Mateo County, and adjacent to San Francisco Bay (Bay).[49] The Bay Area is considered one of the most seismically active areas in the country and, therefore, subject to the effects of earthquakes. The city of Burlingame, as well as the

[49] California Geological Survey. 2002. *California Geomorphic Provinces*. Note 36. Available: https://www.contracosta.ca.gov/DocumentCenter/View/34134/CGS-2002-California-Geomorphic-ProvincesNote-36-PDF. Accessed: February 9, 2021.

Project site, is situated in the central portion of the San Francisco Peninsula, at the eastern edge of a system of ridges, valleys, and hills that lie east of the northwesterly trending rift valley of the active San Andreas fault. The San Andreas fault is a major fault that traverses the Bay Area.

The Project site is located in a commercial area along the southeast side of Airport Boulevard, north of Burlingame Lagoon and west of Sanchez Channel.[50] The site and immediate vicinity are in an area that slopes down very gently to the north and toward the Bay. The Project site is at an elevation of approximately 4 to 9 feet above sea level and underlain by artificial fill, which consists primarily of poorly consolidated to well consolidated gravel, sand, silt, and rock fragments in various combinations. The fill is approximately 6 to 10 feet thick. Underlying the artificial fill are 2 to 4 feet of soft younger Bay Mud with high plasticity. Underlying the younger Bay Mud are interbedded layers of medium-dense to very dense sands and stiff to very stiff clay of low to moderate plasticity. This geologic unit of sandy and clayey material very likely includes both Holocene alluvium and older Pleistocene-era deposits.[51] Both Holocene and Pleistocene geologic units are recorded as surficial geologic units in areas where native sediments are not overlain by artificial fill.

Although subsurface investigation found groundwater at a depth of 19.5 to 20 feet below the ground surface (bgs), the depth to the high groundwater level is considerably less.[52] The historic high groundwater level is less than 10 feet, and because of the low site elevation and proximity to Bay, the highest projected future groundwater depth is estimated to be approximately 1 foot bgs.

Surface Fault Rupture

No mapped faults cross the Project site or are adjacent to the site.[53] In addition, the site is not within a State of California Earthquake Fault Zone. The closest active fault is the San Andreas fault, located approximately 3 miles southeast of the Project site. Accordingly, the likelihood of surface fault rupture resulting from active faulting at the Project site is low.

Ground Shaking

The San Francisco Bay Area is an active seismic region.[54] Historically, the Bay Area has experienced large, destructive earthquakes in 1838, 1868, 1906, and 1989. The faults considered most likely to produce large earthquakes in the area include the San Andreas, San Gregorio, Hayward, and Calaveras faults. Table 3-10 shows the nearby regional faults, the distance and direction of the faults from the Project site, and the maximum magnitude (Mw) expected to occur on the fault.

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50 Romig Engineers. 2020. *Geotechnical Investigation, Burlingame Bay Office Building and Parking Structure, 555 and 577 Airport Boulevard, Burlingame, CA.* (Project No. 5047-1.) April. Prepared for EW-PG Airport Owner, LLC, c/o EverWest Advisor, LLC, Denver, CO. San Carlos, CA.

51 Pampeyan, E.H. 1994. *Geologic Map of the Montara Mountain and San Mateo 7.5-minute Quadrangles, San Mateo County, California*. (U.S. Geological Survey IMAP 2390.) Available: https://pubs.er.usgs.gov/publication/i2390. Accessed: February 9, 2021.

52 Romig Engineers. 2020. *Geotechnical Investigation, Burlingame Bay Office Building and Parking Structure, 555 and 577 Airport Boulevard, Burlingame, CA.* (Project No. 5047-1.) April. Prepared for EW-PG Airport Owner, LLC, c/o EverWest Advisor, LLC, Denver, CO. San Carlos, CA.

53 Ibid.

54 Ibid.

Table 3-10. Regional Faults, Distance and Direction from Project Site, and Maximum Moment Magnitude

Fault	Distance from Project Site (miles)	Direction from Project Site	Maximum Magnitude (Mw)
San Andreas	3	Southeast	7.9
Hayward	15	Northeast	7.1
Calaveras	23	Northeast	6.8
San Gregorio	10	Southwest	7.3

Source: Romig Engineers, 2020.

The Project site is likely to experience strong to severe ground shaking during moderate and large earthquakes along regional Bay Area faults.[55] The U.S. Geological Survey concluded that there is a 72 percent chance for at least one earthquake of magnitude 6.7 or larger in the Bay Area before 2043.[56] The Hayward fault has the highest likelihood of an earthquake greater than or equal to magnitude 6.7 in the Bay Area, estimated at 33 percent; the likelihood on the San Andreas and Calaveras faults is estimated at approximately 22 and 26 percent, respectively.

Liquefaction and Lateral Spreading

Liquefaction occurs when saturated soils lose cohesion, strength, and stiffness with applied shaking, such as that from an earthquake. The lack of cohesion causes solid soil to behave like a liquid, resulting in ground failure. When a load such as a structure is placed on ground that is subject to liquefaction, ground failure can result in the structure sinking and soil being displaced. Ground failure can take on many forms, including flow failures, lateral spreading, ground settlement, loss of bearing strength, ground fissures, and sand boils. Liquefaction within subsurface layers, which can occur during ground shaking associated with an earthquake, can also result in ground settlement.

The Seismic Hazard Zones Map of the San Mateo Quadrangle prepared by the California Geological Survey in 2018 indicates that the site is in an area that may be underlain by soils that could be susceptible to liquefaction during a major earthquake.[57] The geotechnical investigation carried out a site-specific evaluation of the risk of liquefaction at the Project site.[58] The evaluation determined that the interbedded silty sand, sandy silt, and clayey silt to silty clay strata that underlie the younger Bay Mud could liquefy when subjected to strong ground shaking. Total settlement resulting from liquefaction is anticipated to range from 0.6 to 1.7 inches. Differential settlement of 0.8 to 1.3 inches over a horizontal distance of 50 feet could result from liquefaction in areas that are not directly supported by deep foundations.

Lateral spreading, as stated above, can result from liquefaction. Specifically, liquefaction-related lateral spreading results from soil failure on gentle slopes, resulting in horizontal displacement and lateral extension of the soil mass, accompanied by shear and tensile cracking along the ground surface.[59]

[55] Ibid.

[56] Aargaard, B.T., J.L. Blair, J. Boatwright, S.H. Garcia, R.A. Harris, A.J. Michael, D.P. Schwartz, and J.S. DiLeo. 2016. *Earthquake Outlook for the San Francisco Bay Region, 2014–2043*. (U.S. Geological Survey Fact Sheet 2016-3020.) Available: https://pubs.usgs.gov/fs/2016/3020/fs20163020.pdf. Accessed: February 9, 2021.

[57] California Geological Survey. 2018. *Earthquake Zones of Required Investigation: San Mateo Quadrangle.*

[58] Romig Engineers. 2020. *Geotechnical Investigation, Burlingame Bay Office Building and Parking Structure, 555 and 577 Airport Boulevard, Burlingame, CA.* (Project No. 5047-1.) April. Prepared for EW-PG Airport Owner, LLC, c/o EverWest Advisor, LLC, Denver, CO. San Carlos, CA.

[59] Ibid.

Lateral spreading can also occur on nearly flat terrain where horizontal displacement takes place toward an unsupported slope face such as a steep embankment. The anticipated liquefaction at the Project site would take place in the upper 10 feet of sediment; however, the liquefiable layers do not appear to slope toward the an open face, such as Burlingame Lagoon and Sanchez Channel, and the liquefiable layers are not continuous across the Project site. The risk of lateral spreading is anticipated to be low.

Static Settlement, Collapse, and Landslide

The younger Bay Mud present at the Project site is compressible. Applied loads, such as fill and new structures, could result in consolidation and settlement. Furthermore, open excavations and trenches in Bay Mud are prone to instability and collapse because of the lack of soil strength.

Because the Project site is not located in a zone that would be subject to landslide,[60] the risk of landslide is low.

Expansive Soils

Expansive soils are characterized by their ability to undergo significant volume changes (i.e., shrink and swell) with variations in moisture content. Expansive soils are typically very fine grained and have a high to very high percentage of clay. Expansion and contraction can damage structures and buried utilities and increase maintenance requirements. The geotechnical investigation notes that some areas of the artificial fill that blanket the Project site may have moderate to high potential for expansion.[61]

Paleontological Resources

Paleontological resources are fossilized remains, traces, or imprints of once-living organisms that have been preserved in rocks and sediments, providing evidence of past life on Earth. The Society of Vertebrate Paleontology[62] states that significant paleontological resources include fossils of identifiable vertebrate fossils, large or small, and uncommon invertebrate, plant, and trace fossils. The potential for an area to yield significant paleontological resources depends on the geologic age and origin of the underlying rock.

As discussed above, the surficial geologic unit at the Project site is artificial fill to a depth of 6 to 10 feet. This is underlain by 2 to 4 feet of younger Bay Mud, which, in turn, is underlain by sandy clay/clayey sand.[63] Because much of the Burlingame area is underlain by dense alluvial and fluvial sediments of Pleistocene age,[64] this sandy clay/clayey sand at the Project site very likely includes sediments that date to the Pleistocene epoch. Sediments in the Bay Area, including San Mateo County, of Pleistocene age

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60 California Geological Survey. 2018. *Earthquake Zones of Required Investigation: San Mateo Quadrangle.*

61 Romig Engineers. 2020. *Geotechnical Investigation, Burlingame Bay Office Building and Parking Structure, 555 and 577 Airport Boulevard, Burlingame, CA.* (Project No. 5047-1.) April. Prepared for EW-PG Airport Owner, LLC, c/o EverWest Advisor, LLC, Denver, CO. San Carlos, CA.

62 Society of Vertebrate Paleontology. 2010. *Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources.* Available: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf. Accessed: February 16, 2021.

63 Ibid.

64 City of Burlingame. 2010. *Burlingame Downtown Specific Plan*. Initial Study/Mitigated Negative Declaration. May 27. Prepared by PGS&J, San Francisco, CA. Prepared for City of Burlingame, Burlingame, CA. Available: https://www.burlingame.org/departments/planning/general_and_specific_plans.php. Accessed: February 10, 2021.

have yielded vertebrate fossils.[65] Such fossils have the potential to be important in scientific investigation and understanding the history of life on Earth. Vertebrate fossils retrieved from the inland portion of San Mateo County include *Camelops hesternus*, an extinct species of camel; *Equus*, a genus of horse; *Glossotherium*, an extinct genus of ground sloth; and *Allodesmus*, an extinct genus of pinniped.

Burlingame General Plan EIR

The Burlingame General Plan EIR determined that, in most cases, no one goal, policy, or implementation measure is expected to completely avoid or reduce an identified potential environmental impact. However, the cumulative mitigating benefits of governing regulations and policies would result in a less-than-significant impact. In addition, the following goals and policies from the Community Safety Element would reduce impacts on geological and paleontological resources: Goal CS-7, Policy CS-7.1, Policy CS-7.2, and Policy CS-7.3. Burlingame General Plan Mitigation Measure 12-1 would reduce impacts on paleontological resources to less than significant with mitigation.

Discussion

a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. (Less than Significant)

The Project site is not within an earthquake fault zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act (1972) or the Seismic Hazards Mapping Act (1990), and no known fault or potentially active fault exists within the Project site. In seismically active areas, such as the San Francisco Bay Area, the remote possibility exists for future faulting in areas where faults were not previously mapped; however, the likelihood of surface fault rupture as a result of seismic activity at the Project site is low. Impacts would be ***less than significant***.

2. Strong seismic ground shaking? (Less than Significant)

The city of Burlingame lies close to historically active faults that are capable of generating strong earthquakes. Development in the city is likely to be subject to strong seismic ground shaking in the future. This includes development at the Project site. The intensity of earthquake ground motions depend on the characteristics of the generating fault, distance to the fault and rupture zone, earthquake magnitude, earthquake duration, and site-specific geologic conditions. The San Andreas fault is the closest active fault to the Project site, approximately 3 miles to the southeast. This fault is estimated to have an average moment magnitude of 7.9. The Hayward, Calaveras, and San Gregorio faults are also nearby, also with a large average moment magnitude. Accordingly, implementation of the Project would expose people and structures to strong seismic ground shaking during an earthquake.

[65] University of California Museum of Paleontology. 2021. *UCMP Advanced Specimen Search: San Mateo County.* Available: https://ucmpdb.berkeley.edu/advanced.html. Accessed: February 10, 2021.

According to Burlingame Municipal Code Chapter 18.08.095, the City has adopted the 2019 California Building Standards Code, Part 2, Volumes 1 and 2, which requires a design-level geotechnical study to be performed for structures that would be built in areas with known geological hazards, including seismic hazards. Implementation of the recommendations provided in the design-level Project geotechnical study would minimize risks to public safety. Impacts would be ***less than significant***.

3. Seismically related ground failure, including liquefaction? (Less than Significant)

As discussed above, the city of Burlingame lies close to historically active faults that can generate strong earthquakes. As explained above, the Project site could liquefy when subjected to ground shaking. It is possible that the Project would exacerbate risks related to liquefaction. For example, the weight of structures constructed as part of the Project on liquefiable soils would make displacement more likely. The geotechnical report notes that liquefaction-related settlement is expected to be on the order of 0.6 to 1.7 inches.

According to Burlingame Municipal Code Chapter 18.08.095, the City has adopted the 2019 California Building Standards Code, Part 2, Volumes 1 and 2, which requires a design-level geotechnical study to be performed for structures that would be built in areas with known geological hazards. With implementation of the recommendations provided in the design-level Project geotechnical study, impacts related to liquefaction would be ***less than significant***.

4. Landslides? (No Impact)

As discussed above, the Project site is not within a mapped landslide zone or a designated earthquake-induced landslide zone, as shown on the Seismic Hazard Zone Map for the area produced by the California Geological Survey. The Project site is relatively flat, with minor grade variations for drainage. Therefore, the Project would not exacerbate landslide risks. There would be ***no impact*** related to landslide hazards.

b. Result in substantial soil erosion or the loss of topsoil? (Less than Significant)

As discussed in Chapter 2, the Project site contains two multi-tenant office buildings, surface parking lots, and open space, including trails, seating areas, mature trees, and vegetation along the shoreline as well as a publicly available open space with a plaza, lawns, and seating areas in the southeast corner of the Project site. The Project would not increase the amount of impervious surfaces at the Project site.

Construction activities would be required to comply with the provisions in Appendix J of the 2007 California Building Standards Code regarding grading, excavation, and earthwork. In addition, because more than 1 acre of soil would be affected, the Project would be subject to a Construction General Permit from the City, which would stipulate erosion control requirements. Such requirements could include preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs. The purpose of the SWPPP is to identify potential sediment sources and prescribe BMPs to ensure that adverse erosion impacts do not occur during construction. Implementation of the SWPPP, including BMPs, would help the Project control stormwater runoff emanating from the construction site. BMPs may include damp street sweeping; appropriate covers, drains, and storage procedures for outdoor storage areas; and temporary cover for disturbed surfaces, all of which would help the Project minimize erosion.

Furthermore, conformance with City grading standards and the San Mateo County Stormwater Management Plan would help the Project prevent substantial erosion as a result of construction and Project operation. Therefore, the impact would be ***less than significant***.

c. Be located on a geologic unit or soil that is unstable or that would become unstable as a result of the project and potentially result in an onsite or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse? (Less than Significant)

Refer to the discussion under Impact VIIa, above, regarding liquefaction and landslides.

Because the Project site is underlain by younger Bay Mud, the potential exists for soil collapse at the site. Excavation within or near the soft, saturated younger Bay Mud would require special methods (e.g., shoring, bracing, sloping the cut to an appropriate inclination during construction to avoid collapse and/or failure). In addition, the use of heavy equipment or stockpiles at the Project site could cause settlement within the younger Bay Mud and cause instability at nearby open trenches.

The younger Bay Mud, discussed previously under the Static Settlement, Collapse, and Landslide subheading, is also prone to consolidation and settlement. It is expected that it would be compressible under the new building and fill loads. Static settlement could range from 0.9 to 11.2 inches, depending on loading conditions, including the depth of the fill at the Project site, over a 30-year consolidation settlement period. Substantial settlement could undermine foundations and utilities, depending on construction practices.

Although the Project site has the potential for liquefaction, the Project is not expected to cause lateral spreading. The anticipated liquefaction at the Project site would take place in the upper 10 feet of sediment; however, the liquefiable layers do not appear to slope toward an open face, such as Burlingame Lagoon and Sanchez Channel, and the liquefiable layers are not continuous across the Project site. The risk of lateral spreading is anticipated to be low.

According to Burlingame Municipal Code Chapters 18.08.005 and 18.08.095, the City has adopted the 2019 California Building Standards Code, Part 2, Volumes 1 and 2, which requires a design-level geotechnical study to be performed for structures that would be built in areas with known geological hazards. With implementation of the Geotechnical Engineer's recommendations in the design-level geotechnical study, the Project would be designed to withstand soil hazards at the site, including settlement. The Project impact would be ***less than significant***.

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

As discussed previously under the Expansive Soils subheading, some artificial fill at the Project site could have moderate to high potential for expansion. However, recommendations made in the field by the Geotechnical Engineer and outlined in the preliminary geotechnical investigation would be followed. In addition, with implementation of further recommendations anticipated to be provided in the design-level geotechnical study, impacts related to expansive soils would be ***less than significant***.

e. Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater? (No Impact)

During construction and operation, the Project would dispose of wastewater by using the existing wastewater infrastructure operated by the City. No aspect of the Project would entail any new use of septic tanks or alternative wastewater disposal systems. Therefore, there would be ***no impact*** related to the use of septic tanks or alternative wastewater disposal systems.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? (Less than Significant with Mitigation)

The Project site is underlain by 6 to 10 feet of artificial fill. The fill is underlain by 2 to 4 feet of younger Bay Mud, which, in turn, is underlain by dense alluvial and fluvial sediments of Pleistocene age at a minimum depth of approximately 8 feet bgs. These Pleistocene deposits could contain significant fossils. Therefore, the potential exists for paleontological resources to be present in the soil underlying the Project site.

The Project would require excavation to a maximum depth of 10 to 12 feet bgs for a utility structure and 4 to 6 feet bgs for foundation pile caps. Because excavation associated with utility structures could extend into the paleontologically sensitive Pleistocene alluvial and fluvial sediments, it is possible that excavation could encounter significant paleontological resources. Any damage or destruction of these paleontological resources would constitute a significant impact. Implementation of Burlingame General Plan Mitigation Measure 12-1 (reproduced below) would reduce impacts on paleontological resources to ***less than significant with mitigation***.

Mitigation Measure 12-1: Paleontological Assessment

In areas containing Middle to Late Pleistocene–era sediments where it is unknown if paleontological resources exist, prior to grading, an assessment shall be made by a qualified paleontological professional to establish the need for paleontological monitoring. Should paleontological monitoring be required after recommendation by the professional paleontologist and approval by the Community Development Director, paleontological monitoring shall be implemented.

VIII. Greenhouse Gas Emissions

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the Project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?	☐	☐	☒	☐

Setting

Global Climate Change

The process known as the *greenhouse effect* keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight that strikes Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thereby enhancing the greenhouse effect and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution.[66] Rising atmospheric concentrations of GHGs in excess of natural levels result in increasing global surface temperatures—a process commonly referred to as *global warming*. Higher global surface temperatures, in turn, result in changes to Earth's climate system, including increased ocean temperatures and acidity, reduced areas of sea ice, variable precipitation, and increased frequencies and intensities during extreme weather events.[67] Large-scale changes to Earth's system are collectively referred to as *climate change.*

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to understanding climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming reached a level approximately 1°C above pre-industrial levels in 2017 and is increasing at a rate of 0.2°C per decade. With current nationally determined contributions from mitigation through 2030, global warming is

[66] Intergovernmental Panel on Climate Change. 2007. *Climate Change 2007: The Physical Science Basis.* Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Available: https://www.ipcc.ch/site/assets/uploads/2018/05/ar4_wg1_full_report-1.pdf. Accessed: April 2021.

[67] Intergovernmental Panel on Climate Change. 2018. *Global Warming of 1.5°C.* Contribution of Working Groups I, II, and III. Available: https://www.ipcc.ch/sr15/. Accessed: April 2021.

expected to increase the temperature by 3°C by 2100, with warming to continue afterward.[68] Large increases in global temperatures could have substantial adverse effects on natural and human environments worldwide.

Greenhouse Gases

The principal anthropogenic (human-made) GHGs that contribute to global warming are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), and fluorinated compounds, including sulfur hexafluoride, hydrofluorocarbons (HFCs), and perfluorocarbons. Water vapor, the most abundant GHG, is not included in this list because its natural concentrations and fluctuations far outweigh its anthropogenic sources.

The primary GHGs of concern associated with the Project are CO_2, CH_4, and N_2O. The principal characteristics of these pollutants are discussed below.

CO_2 enters the atmosphere through fossil fuel (i.e., oil, natural gas, coal) combustion, solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., from cement manufacturing). CO_2 is also removed from the atmosphere (or *sequestered*) when it is absorbed by plants as part of the biological carbon cycle.

CH_4 is emitted during the production and transport of coal, natural gas, and oil. CH_4 emissions also result from livestock and agricultural practices as well as the decay of organic waste in municipal solid waste landfills.

N_2O is emitted during agricultural and industrial activities as well as the combustion of fossil fuels and solid waste.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method for comparing GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO_2e) emissions, which compares the gas in question to that of the same mass of CO_2 (CO_2 has a global warming potential of 1 by definition). Table 3-11 lists the global warming potential of CO_2, CH_4, and N_2O and their lifetimes in the atmosphere.

Table 3-11. Lifetime and Global Warming Potential of Key Greenhouse Gases[69]

Greenhouse Gas	Global Warming Potential (100 years)	Lifetime (years)
CO_2	1	50–200
CH_4	25	9–15
N_2O	298	121

Notes: CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide

[68] Ibid.

[69] California Air Resources Board. 2018. *Global Warming Potentials.* Last reviewed: June 22. Available: https://www.arb.ca.gov/cc/inventory/background/gwp.htm#transition. Accessed: September 2020.

All GWPs used for CARB's GHG inventory, as well as an assessment of attainment with respect to the state's 2020 and 2030 reduction targets, are considered over a 100-year timeframe (as shown in Table 3-11). However, CARB recognizes the importance of short-lived climate pollutants as well as the importance of reducing emissions to achieve the state's overall climate change goals. Short-lived climate pollutants have atmospheric lifetimes on the order of a few days to a few decades. Their relative climate-forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of times greater than that of CO_2.[70] Recognizing their short-term lifespan and warming impact, short-lived climate pollutants are measured in terms of CO_2e, using a 20-year time period. The use of GWPs with a time horizon of 20 years captures the importance of the short-lived climate pollutants and gives a better perspective on the speed at which emission controls affect the atmosphere relative to CO_2 emission controls. The Short-Lived Climate Pollutant Reduction Strategy addresses CH_4, HFC gases, and anthropogenic black carbon. CH_4 has lifetime of 12 years and a 20-year GWP of 72. HFC gases have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200.[71] The Project would be evaluated with the 100-year GWPs in Table 3-11 to be consistent with CARB's emissions inventory and plans. In addition, the Project would not include emissions sources that emit substantial amounts of short-lived climate pollutants; therefore, the 20-year GWP is presented for informational purposes only.

Greenhouse Gas Reporting

A GHG inventory is a quantification of all GHG emissions and sinks[72] within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources. Table 3-12 outlines the most recent global, national, statewide, and local GHG inventories to help contextualize the magnitude of potential Project-related emissions.

Regulatory Setting

State

California has established various regulations to address GHG emissions. The most relevant of these regulations are described below.

State Legislative Reduction Targets

Assembly Bill (AB) 32 (Chapter 488, Statutes of 2006), the Global Warming Solutions Act of 2006, requires the state to reduce GHG emissions to 1990 levels by 2020. Senate Bill (SB) 32 (2016) requires the state to reduce emissions to 40 percent below the 1990 level by 2030. The state's plan to reach these targets is presented in periodic scoping plans. CARB adopted the 2017 climate change scoping plan

[70] California Air Resources Board. 2017. *Short-Lived Climate Pollutant Reduction Strategy*. March. Available: https://ww2.arb.ca.gov/sites/default/files/2020-07/final_SLCP_strategy.pdf. Accessed: April 2021.

[71] Ibid.

[72] A GHG sink is a process, activity, or mechanism that removes GHG from the atmosphere.

Table 3-12. Global, National, State, and Regional Greenhouse Gas Emission Inventories

Emissions Inventory	CO_2e (metric tons)
2017 IPCC Global GHG Emissions Inventory[a]	53,500,000,000
2019 EPA National GHG Emissions Inventory[b]	6,577,000,000
2018 CARB State GHG Emissions Inventory[c]	425,300,000
2015 BAAQMD GHG Emissions Inventory[d]	85,000,000

Sources:

[a] United Nations. 2018. *Emissions Gap Report 2018*. December 5. Available: https://www.ipcc.ch/site/assets/uploads/2018/12/UNEP-1.pdf. Accessed: April 2021.

[b] U.S. Environmental Protection Agency. 2021. *Draft Inventory of U.S. Greenhouse Gas Emissions and Sinks.: 1990–2019.* Available: https://www.epa.gov/sites/production/files/2021-02/documents/us-ghg-inventory-2021-main-text.pdf. Accessed: April 2021.

[c] California Air Resources Board. 2020. *California Greenhouse Gas Emission Inventory – 2020 Edition*. Available: https://ww2.arb.ca.gov/ghg-inventory-data. Accessed: April 2021.

[d] Bay Area Air Quality Management District. 2017a. *Final 2017 Clean Air Plan, Spare the Air, Cool the Climate*. Adopted: April 19. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed: February 25, 2021.

Notes: IPCC = Intergovernmental Panel on Climate Change; EPA = U.S. Environmental Protection Agency; CARB = California Air Resources Board; BAAQMD = Bay Area Air Quality Management District; CO_2e = carbon dioxide equivalent

in November 2017 to meet the GHG reduction requirement set forth in SB 32[73] and proposed continuing the major programs of the previous scoping plan (e.g., programs involving cap-and-trade regulation, low-carbon fuel standards, more efficient cars and trucks, more efficient freight movement, the Renewables Portfolio Standard, CH_4 emissions from agricultural and other wastes). The current scoping plan articulates a key role for local governments, recommending that they establish GHG reduction goals for both municipal operations and the community consistent with those of the state.

Energy Efficiency Standards

The California Green Building Standards Code (Title 24, proposed Part 11) was adopted as part of the California Building Standards Code (California Code of Regulations Title 24). Part 11 established voluntary standards (known as the CALGreen standards) that became mandatory under the 2010 edition of the code. The standards concerned sustainable site development, energy efficiency (in excess of California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The current energy efficiency standards were adopted in 2019 and took effect on January 1, 2020.

Local

Metropolitan Transportation Commission

The Metropolitan Transportation Commission (MTC) is the metropolitan planning organization for the nine counties that make up the San Francisco Bay Area and the SFBAAB, which includes the city of Burlingame. As described above, SB 375 requires the metropolitan planning organizations to prepare regional transportation plans/sustainable communities strategies (RTPs/SCSs) that present integrated regional land use and transportation approaches for reducing VMT and their associated GHG emissions. CARB identified an initial goal for the SFBAAB, which is to reduce VMT per capita by 7 percent by 2020 and

[73] California Air Resources Board. 2017. *The 2017 Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 GHG Target.* November. Available: https://ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf. Accessed: April 2021.

15 percent by 2035 compared to 2005 levels. The MTC adopted an RTP/SCS in 2013 known as *Plan Bay Area,* which was updated in 2017 and named *Plan Bay Area 2040,* to meet the initial goal. In 2018, CARB updated the per capita GHG emissions reduction targets, which called for a 10 percent per capita GHG reduction by 2020 and 19 percent per capita GHG reduction by 2035 compared to 2005 levels.[74] MTC will be addressing the revised goals in the next RTP/SCS.

Plan Bay Area 2040 and the next RTP/SCS are relevant to the Project because the CEQA Guidelines require an assessment of a project's consistency with plans to reduce GHG emissions.

Bay Area Air Quality Management District

As discussed in Section III, *Air Quality*, BAAQMD is responsible for air quality planning within the SFBAAB, including projects in the city of Burlingame. BAAQMD has adopted advisory emissions thresholds to assist CEQA lead agencies in determining the level of significance of a project's GHG emissions; the thresholds are outlined in the agency's *California Environmental Quality Act: Air Quality Guidelines*.[75] The emissions thresholds apply only to projects with buildout years prior to 2020. The BAAQMD CEQA Guidelines also outline methods for quantifying GHG emissions as well as potential mitigation measures.

City of Burlingame Climate Action Plan

The City Climate Action Plan, adopted in 2019, is a comprehensive GHG emissions reduction strategy for achieving the Burlingame's fair share of statewide emissions reductions within the 2020 and 2030 timeframe, consistent with AB 32 and SB 32. The Climate Action Plan also forecasts annual GHG emissions and provides reduction targets for 2040 and 2050. However, the Climate Action Plan notes that:

> It is speculative to demonstrate achievement with longer-term goals for 2040 and 2050, based on the information known today. Furthermore, the BAAQMD does not currently recommend demonstrating compliance with these future years.[76]

The Climate Action Plan specifies Burlingame General Plan policies as well as actions, including feasible GHG emissions reduction measures, which are implemented on a project-by-project basis, to achieve Burlingame's reduction targets through 2030. CEQA clearance for discretionary development proposals is required to address issues related to the consistency of individual projects with the reduction measures in a jurisdiction's qualified Climate Action Plan as well as the goals and policies in the Burlingame General Plan to reduce GHG emissions. Compliance with appropriate measures in the Climate Action Plan would ensure an individual project's consistency with an adopted GHG reduction plan. Projects that are consistent with the qualified Climate Action Plan would have a less-than-significant impact related to GHG emissions generated through the 2030 planning horizon of the plan. The City's 2019 Climate Action Plan was prepared consistent with CEQA Guidelines Section 15183.5 and therefore is a qualified strategy. Therefore, the Project is eligible to tier from it.

The Climate Action Plan provides a consistency checklist to ensure that development projects in the city are consistent with the plan and a streamlined process for projects to follow while undergoing CEQA review. The Climate Action Plan states that "projects that are consistent with the Climate Action

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[74] California Air Resources Board. 2018b. *Regional Plan Targets*. March. Available: https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/regional-plan-targets. Accessed: September 2020.

[75] Bay Area Air Quality Management District. 2017a. *California Environmental Quality Act: Air Quality Guidelines*. May. Available: http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: September 2020.

[76] City of Burlingame. 2019. *City of Burlingame 2030 Climate Action Plan.* Available: https://www.burlingame.org/document_center/Sustainability/CAP/Climate%20Action%20Plan_FINAL.pdf#page=50. Accessed: September 2020.

Plan (as demonstrated with use of the checklist) may rely on the Climate Action Plan for the impact analysis of GHG emissions, as required under CEQA." The project-specific checklist is included in Appendix F of this document.

Discussion

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? (Less than Significant)

Construction is anticipated to span approximately 26 months, beginning in 2022. Construction activities would generate direct emissions of CO_2, CH_4, and N_2O from the use of mobile and stationary construction equipment as well as vehicles (e.g., employee and vendor vehicles, trucks for hauling materials). Indirect emissions (i.e., emissions that occur offsite) would be generated with the use of electricity for construction equipment and water for dust control.

During Project operations, GHG emissions would be associated with on-road vehicles, landscaping equipment, landfill waste, electricity for building energy and water conveyance, and operation of emergency generators for maintenance testing. Specifically, the operational activities that would generate GHG emissions would include vehicle trips made by building occupants and visitors, energy consumption at the building (i.e., electricity and natural gas), water consumption at the building, emergency generator testing, and the generation of waste, which would be sent to landfills.

Water consumption results in indirect GHG emissions from the conveyance, distribution, and treatment of water that is ultimately consumed in a building and then processed in a wastewater treatment plant. Waste emissions would be generated from the release of fugitive CH_4 associated with the decomposition of organic matter at landfills. There would also be emissions from the use of electricity and/or gasoline to power landscaping equipment. The Project would involve the intermittent use of two diesel emergency generators with ratings of 750 kilowatts (kW) and 1,500 kW. The combustion of diesel fuel would result in GHG emissions.

Transportation emissions are usually the largest portion of a typical project's emissions. The Project would implement a number of features to reduce transportation emissions. In addition, the Project would be close to high-quality transit options provided by SamTrans, the Burlingame Trolley, and the Burlingame Bayside Shuttle. In the immediate vicinity of the Project, SamTrans Routes ECR, 46, 292, 397, and 398 provide service to the Project site and vicinity. The closest SamTrans bus stop, serving Route 292, is 500 feet west of the intersection of Bayshore Highway and Airport Boulevard/Broadway. The closest Burlingame Trolley stop is at the Hilton Hotel, across the street from the Project site. The closest Burlingame Bayside Shuttle stop is adjacent to the Project site at the corner of Airport Boulevard and Bay View Place.

The Project would incorporate TDM strategies to achieve a 20 percent reduction in trip generation rates compared to the standard rates estimated by the Institute of Transportation Engineers in its *Trip Generation Manual* (10th edition). The TDM would be implemented consistent with the City 2030 Climate Action Plan and C/CAG of San Mateo County requirements. The strategies would include, but not be limited to, providing showers and lockers rooms for bicyclists and/or pedestrians who commute to work, subsidized transit passes, and preferential parking for carpools and vanpools. These actions would ensure compliance with the City's Climate Action Plan and serve to reduce VMT and GHG emissions.

The Project would incorporate the sustainable design measures listed below in the design of structures if technically and economically feasible. General design approaches and strategies may include:

- Optimizing the building envelope to balance energy uses (e.g., artificial lighting, heating/cooling systems, fans) while also providing healthy, productive spaces for building occupants (e.g., daylight, views, thermal comfort)
- Using passive design strategies to minimize reliance on active heating and cooling systems.
- Selecting energy-efficient heating, ventilation, and air-conditioning approaches and equipment.
- Evaluating electric sources of heat for various applications.
- Balancing ventilation and indoor air quality outcomes alongside energy efficiency considerations.
- Using efficient water-consuming devices (e.g., appliances, cooling equipment) to minimize demand for water and manage energy consumption associated with domestic hot-water systems.
- Prioritizing efficient landscaping practices.
- Reviewing opportunities to reuse water onsite (e.g., stormwater or gray water) to minimize water consumption and manage site outflows.
- Reviewing opportunities for the installation of onsite renewable energy (e.g., photovoltaic, solar thermal).
- Reviewing the technical and financial feasibility of pursuing all-electric energy systems for the building in the context of the laboratory program.

With respect to electric vehicles, the Project would comply with the City's electric-vehicle charging station requirements by installing electric-vehicle chargers. The Project would therefore encourage the use of electric vehicles, consistent with the Climate Action Plan, resulting in fewer transportation emissions generated relative to a scenario with only vehicles powered by internal-combustion engines.

The building's LEED certification rating of Silver would result in reduced GHG emissions related to energy and water consumption. LEED certification would reflect energy and water efficiency improvements, consistent with the goals of the Climate Action Plan. In addition, the Project would exceed CALGreen requirements.

Solid waste, some of which would be recycled or composted, would be collected at the Project site. Recycling and composting diverts organic material from landfills and reduces associated GHG emissions. The Project would provide adequate receptacles for solid waste, recycling, and composting.

The City's Climate Action Plan demonstrates that Burlingame will reduce its GHG emissions in 2030 to 40 percent below 1990 levels, consistent with the goals of SB 32. As discussed above and included in Appendix F (Climate Action Plan Consistency Checklist), the Project would generally comply with the Climate Action Plan by implementing features and strategies that would reduce emissions generated from transportation, energy, water, and waste sources during operations. Other existing regulations and plans, such as those implemented through the scoping plan, would also continue to reduce the Project's GHG emissions and contributions to climate change.

Because the Project would be consistent with the City's Climate Action Plan, it would also be consistent with the GHG reduction goals of Executive Order B-30-15 and SB 32. The Project would therefore facilitate implementation of these goals and, consequently, would not generate GHG emissions that would have a significant impact on the environment. The Project's contribution to GHG impacts would be ***less than significant***, and mitigation is not required.

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases? (Less than Significant)

As discussed above in Impact VIIIa, the Project would be consistent with the City's Climate Action Plan and, therefore, with the goals of SB 32. The features that the Project would implement to reduce emissions, discussed above, would also be generally consistent with the goals of other plans and policies adopted to reduce GHG emissions, such as BAAQMD's 2017 Clean Air Plan and Plan Bay Area. Given its consistency with the Climate Action Plan and statewide goal, which is the pre-eminent regulation pertaining to the science of climate change in California, the Project would not conflict with applicable plans, policies, or regulations adopted to reduce GHG emissions. This impact would be ***less than significant,*** and no mitigation is required.

IX. Hazards and Hazardous Materials

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	☐	☒
d.	Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment?	☐	☐	☐	☒
e.	Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Setting

Hazardous Materials

The setting discussion for hazardous materials is based on the Phase I Environmental Site Assessment (Phase I ESA) prepared for the Project site in May 2018.[77] The purpose of the Phase I ESA was to identify recognized environmental conditions[78] (RECs) at the Project site related to previous ownership and uses at the Project site or on adjoining properties as well as controlled recognized environmental conditions[79] (CRECs) and historical recognized environmental conditions (HRECs).[80] The Phase I ESA was conducted in accordance with 40 Code of Federal Regulations Part 312, Innocent Landowners, Standards for Conducting All Appropriate Inquiries, and American Society for Testing and Materials (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process E 1527-13.

The Phase I ESA found no evidence of RECs, CRECs, or HRECs in connection with the Project site.[81] An Environmental Data Resources (EDR) search of federal, state, local, tribal, and proprietary environmental databases was conducted to determine the environmental regulatory status of the site, adjoining facilities, and facilities identified within the ASTM E 1527-13 approximate minimum search distance (AMSD) from the site. The search returned the following results:

- Project site: The Project site is listed in the Emissions Inventory Data (EMI), HAZNET, San Mateo County Business Inventory (San Mateo County BI), and Facility Index System (FINDS) databases.
    - The EMI database states that air emissions testing has occurred at the site since 2005, most likely in connection with the generators at the site. No air emissions violations were reported.
    - The HAZNET database indicates that former tenants at the site disposed of latex waste, surplus organics, and waste oil in 2009 and 2010; the surplus organics and waste oil were removed in 2010.
    - The San Mateo County BI database has inactive and active registrations for facilities that store fuel or waste oil onsite. Aboveground fuel storage tanks are not considered RECs.

[77] Blackstone Consulting, LLC. 2018. *Phase I Environmental Site Assessment, Burlingame Bay Office Park, 555–577 Airport Boulevard, Burlingame, San Mateo County, California 94010.* May. (Project No. EVRWCO011.01.) Prepared for EW-PG Airport Owner, LLC, and CLNC Credit 1, LLC, and its affiliates, successors, and assigns.

[78] RECs refer to the presence or likely presence of any hazardous substance or petroleum product in, on, or at the site due to (1) a release to the environment, (2) conditions indicative of a release to the environment, or (3) conditions that pose a material threat of a future release to the environment.

[79] A CREC is a recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (e.g., as evidenced by the issuance of a "no further action" letter or equivalent or meeting the risk-based criteria established by a regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to implementation of required controls (e.g., property use restrictions, activity and use limitations, institutional controls, engineering controls).

[80] An HREC is a past release of hazardous substances or petroleum products that occurred in connection with a property that has been addressed to the satisfaction of the applicable regulatory authority or has met the unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (e.g., property use restrictions, activity and use limitations, institutional controls, engineering controls).

[81] Blackstone Consulting, LLC. 2018. *Phase I Environmental Site Assessment, Burlingame Bay Office Park, 555-577 Airport Boulevard, Burlingame, San Mateo County, California 94010*. May. (Project No. EVRWCO011.01.) Prepared for EW-PG Airport Owner, LLC, and CLNC Credit 1, LLC, and its affiliates, successors, and assigns.

- The FINDS database is a "pointer" database (i.e., it points to other regulatory databases that contain more detailed information about a listing). The FINDS database references the state master list and the air emissions database.

The Project site is not listed in any other database that reported a release. Given the absence of reported releases or violations, the database listings do not represent an REC.

- Adjoining facilities or facilities in proximity to the Project site:
  - Sprint Communications and Verizon Wireless (533 Airport Boulevard): Northwest of the site and cross-gradient, based on inferred groundwater flow. This adjoining property is listed on the San Mateo County BI database for storing hazardous materials and fuels/waste oil. This database listing is most likely related to the wireless antennas and other equipment located on the roof. No spills, releases, or violations were identified. Given the absence of reported releases or violations, the database listings do not represent an REC.
  - Sprint Nextel and AT&T Mobility (433 Airport Boulevard): Northwest of the site and cross-gradient, based on inferred groundwater flow. This adjoining property is listed on the San Mateo County BI database for storing hazardous materials and fuels/waste oil. This database listing is most likely related to the wireless antennas and other equipment located on the roof. No spills, releases, or violations were identified. Given the absence of reported releases or violations, the database listings do not represent an REC
  - Clean n Press (500 Airport Boulevard): Approximately 100 feet northwest of the site and downgradient. This facility was listed in the EDR Historical Cleaners database between 1995 and 2005. The EDR Historical Cleaners database is a proprietary database, the contents of which are compiled exclusively from EDR's internal review of historical business listings and names potentially associated with dry-cleaning and not indicative of a confirmed business location or operation. This listing was not identified in any other regulatory databases of active dry-cleaning facilities. Considering the facility's cross-gradient position in relationship to the site and the nature of the listing, this facility is not considered an REC.
  - Hilton San Francisco Airport Hotel and Sheraton Gateway San Francisco Airport Hotel (600 Airport Boulevard): Northwest of the site and downgradient, based on inferred groundwater flow. This adjoining property is listed on the San Mateo County BI database for storing hazardous materials and fuels/waste oil. No spills, releases, or violations were identified. Given the absence of reported releases or violations, the database listings do not represent an REC
  - Golden Gate Drywall (399 Beach Road): Approximately 250 feet southeast of San Francisco Bay and cross-gradient, based on inferred groundwater gradient. This facility is listed in the leaking underground storage tank (UST), HIST UST, CA FID UST, and San Mateo County BI databases. This facility had a 2,000-gallon UST for gasoline installed in 1982; it is currently listed as a historic UST. The UST was reported as leaking in 1993. The leak reportedly affected groundwater. The leaking UST received regulatory closure in 2002. No further action was warranted. Given the inferred groundwater flow, distance from the site, and regulatory closure, operations at this facility do not represent an REC.
- Non-adjoining facilities within the specified AMSD: As detailed in the EDR report, several non-adjoining facilities are within the AMSD. However, based on factors such as distance to the site, topography, media affected (e.g., surface water, soil, soil vapor, air), depth to groundwater, anticipated groundwater flow, and/or regulatory status (i.e., "case closed" and/or "no further

action"), these non-adjoining facilities within the AMSD are unlikely to be the locations of current or past releases of hazardous substances and/or petroleum products that could migrate to the Project site and therefore are not considered RECs.

One "Business Environmental Risk Issue" was identified in connection with the Project site. Because of the site's proximity to San Francisco Bay, a stormwater pump system was installed along the southern portion of the parking area to prevent flooding during high tides or periods of heavy rainfall. Based on the site inspection, discharges associated with the water pump system flow directly to San Francisco Bay. No information regarding the design, permitting, or compliance requirements were identified for review. Given the nature of the system (i.e., for dewatering during storm events/high tides), it is not considered an REC. However, details regarding the configuration, maintenance, permitting, and reporting requirements for the dewatering system should be obtained before Project construction. The system should be operated in accordance with all applicable regulations.

Schools, Airports, and Wildfire

No schools are within 0.25 mile of the Project site.

The Project site is within the land use plan area for San Francisco International Airport (SFO); the site is within approximately 1.6 mile of SFO.[82] It does not lie within a Safety Compatibility Zone.

The city of Burlingame falls within a California Department of Forestry and Fire Protection Local Responsibility Area. The city is zoned as a Non-Very High Fire Hazard Security Zone.[83] The Project site is a developed property within an urban portion of the city, with no nearby wildland areas.

Regulatory Setting

Many federal, state, and local regulations regarding the transport, use, or disposal of hazardous materials apply to the Project. The Federal Toxic Substances Control Act (1976) and the Resource Conservation and Recovery Act of 1976 (RCRA) established an EPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous waste.

U.S. Department of Transportation (DOT) Hazardous Materials Regulations cover all aspects of hazardous materials packaging, handling, and transportation. Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), and 177 (Highway Transportation) are applicable examples.

The Department of Toxic Substances Control (DTSC), a department of the California Environmental Protection Agency, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. Division 20, Chapter 6.5, of the California Health and Safety Code deals with hazardous waste control through regulations pertaining to the transport, treatment, recycling, disposal,

[82] Ricondo and Associates. 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*. November. Prepared for City/County Association of Governments of San Mateo County, Redwood City, CA. Available: https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf. Accessed: March 2, 2021.

[83] California Department of Forestry and Fire Protection. 2008. *Very High Fire Hazard Severity Zones in Local Responsibility Area, San Mateo County*. Available: https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf. Accessed: March 2, 2021.

enforcement, and permitting of hazardous waste. Division 20, Chapter 6.10, contains regulations applicable to the cleanup of hazardous materials releases. Title 22, Division 4.5, contains environmental health standards for the management of hazardous waste. This includes standards for the identification of hazardous waste (Chapter 11) and standards that apply to transporters of hazardous waste (Chapter 13).

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (California Health and Safety Code, Chapter 6.11, Sections 25404–25404.9) consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities of environmental and emergency response programs and provides authority to the Certified Unified Program Agency (CUPA). The CUPA is designed to protect public health and the environment from accidental releases and improper handling, storage, transport, and disposal of hazardous materials and wastes. This is accomplished through inspections, emergency response, enforcement, and site mitigation oversight. The CUPA for Burlingame is San Mateo County Health.[84]

The California Division of Occupational Safety and Health (Cal/OSHA) and the federal Occupational Safety and Health Administration (OSHA) enforce occupational safety standards to minimize worker safety risks from both physical and chemical hazards in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices, all of which would be applicable to construction of the Project. The standards included in Cal/OSHA's Title 8 include regulations pertaining to hazard control, including administrative and engineering controls; hazardous chemical labeling and training requirements; hazardous exposure prevention; hazardous material management; and hazardous waste operations.

The California Labor Code is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials as well as the operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who handle hazardous materials are appropriately trained. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

Dischargers whose projects disturb 1 or more acres of soil, such as the Project, are required to obtain coverage under the Construction General Permit. Construction activities subject to this permit include clearing, grading, and ground disturbances such as stockpiling or excavation. Furthermore, as discussed in Section X, *Hydrology and Water Quality*, the Project would be required to comply with the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) permit (Order No. R2-2015-0049, NPDES Permit No. CAS612008). This NPDES permit is also known as the San Francisco Bay Municipal Regional Permit (MRP). It continues in force and effect until a new permit is issued or the permit is rescinded.

Erosion control requirements are specified in the Construction General Permit and the MRP. These requirements include preparation and implementation of an SWPPP that contains best management practices (BMPs). The SWPPP would identify potential sources of sediment and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination impacts do not occur during construction activities. Implementation of a SWPPP and BMPs would control erosion and protect water quality from potential contaminants in stormwater runoff from the construction site.

[84] San Mateo County Health. 2021. *Certified Unified Program Agency*. Available: https://www.smchealth.org/hazardous-materials-cupa. Accessed: March 2, 2021.

Burlingame General Plan EIR

The Burlingame General Plan EIR concluded that the City will ensure that existing regulations and land use policies will be used to avoid or reduce identified potential environmental impacts associated with hazardous materials. Although no one goal or policy is expected to completely avoid or reduce an impact, the collective, cumulative mitigating benefits of the policies would result in a less-than-significant impact related to hazards and hazardous materials. Per the Burlingame General Plan EIR, the following goals and policies from the Community Safety Element would help reduce impacts to less than significant: Goal CS 6, Policy CS-6.1, Policy CS-6.2, Policy CS-6.3, Policy CS-6.4, and Policy CS-6.5; Goal CS-8, Policy CS-8.1, Policy CS-8.2, and Policy CS-8.3; and Goal CS-2, Policy CS-2.2, Policy CS-2.3, Policy CS-2.4, and Policy CS-2.6.

Discussion

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? (Less than Significant)

Project construction would involve the routine transport, use, and disposal of hazardous materials such as fuel, solvents, paints, oils, grease, and caulking. During Project operation, hazardous materials that are commonly found in office and retail spaces (e.g., paints, solvents, cleaning agents) would be stored and used onsite.

Hazardous materials used during operations would be used in small quantities, and spills would be cleaned up as they occur. The transport, use, and disposal of hazardous materials during construction would be required to comply with applicable regulations, as discussed above. These include the RCRA, DOT Hazardous Materials Regulations, and the local CUPA regulations. Although these materials would be transported, used, and disposed of during construction and operation, they are commonly used in construction projects and would not represent the transport, use, or disposal of acutely hazardous materials. With adherence to applicable regulations, impacts would be ***less than significant***.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment? (Less than Significant)

Hazardous materials, including fuel, solvents, paints, oils, grease, etc., would be transported, stored, used, and disposed of onsite during both Project construction and operation. It is possible that these substances could be released to the environment during transport, storage, use, or disposal. However, compliance with federal, state, and local regulations, in combination with temporary construction BMPs (as part of Construction General Permit requirements), would ensure that all hazardous materials would be used, stored, and disposed of properly, which would minimize potential impacts related to a hazardous materials release during construction and operation of the Project.

As discussed above, the site-specific Phase I ESA did not identify any RECs, CRECs, or HRECs associated with onsite environmental conditions or offsite environmental conditions with the potential to affect the Project site. Because demolition is not proposed, the presence of hazardous materials, such as polychlorinated biphenyls (PCBs), asbestos-containing materials, and lead-based paint, in the existing onsite buildings is not a concern. With adherence to applicable regulations, impacts would be ***less than significant***.

c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school? (No Impact)

No schools are located within 0.25 mile of the Project site. There would be ***no impact***.

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment? (No Impact)

United States Code Section 65962.5 (commonly referred to as the Cortese List) pertains to DTSC-listed hazardous waste facilities and sites, Department of Health Services–listed contaminated wells for drinking water, State Water Resources Control Board–listed sites with leaking USTs or discharges of hazardous wastes or materials into the water or groundwater, and lists of sites from local regulatory agencies with a known migration of hazardous waste/material. The Project site is not included on a list of hazardous materials sites compiled pursuant to Section 65962.5. There would be ***no impact***.

e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within 2 miles of a public airport or public use airport and result in a safety hazard or excessive noise for people residing or working in the project area? (Less than Significant)

The Project site is within the Federal Aviation Regulation Part 77 sphere of influence and the boundary of the SFO Airport Land Use Compatibility Plan.[85] However, it does not lie within a Safety Compatibility Zone. The Federal Aviation Administration (FAA) has evaluated the proposed building under 49 United States Code Section 44718 and Code of Federal Regulations Title 14, Part 77.9. The FAA determined that the proposed building would not exceed obstruction standards and would not be a hazard to air navigation, provided that a Notice of Actual Construction or Alteration (FAA Form 7460-2) is filed within 5 days after construction reaches its greatest height (7460-2, Part 2) or if the Project is abandoned.[86] The proposed building would not pose a safety hazard. Impacts would be ***less than significant***.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? (Less than Significant)

The Project would add a new structure on currently developed commercial land. The site plan includes access points to ensure proper ingress for emergency vehicles. The Project site would be accessed from two existing driveways west and north of the proposed building. These driveways would be used to access the existing buildings, the proposed building, and the proposed parking structure. The interior circulation roads would include surface parking as well. The driveways and interior circulation roads would be between 26 and 29 feet wide, not including parking spaces. There would be adequate space for emergency vehicles to access the site and maneuver as needed. The City does not have an established evacuation plan; however, the Project would adhere to the guidelines established by the Community Safety Element of the Burlingame General Plan. Although the Project would add additional vehicles to Airport Boulevard, their presence

[85] Ricondo and Associates. 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*. November. Prepared for City/County Association of Governments of San Mateo County, Redwood City, CA. Available: https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf. Accessed: March 2, 2021.

[86] Federal Aviation Administration. 2021. *Determination of No Hazard to Air Navigation*. Southwest Regional Office, Obstruction Evaluation Group. (Aeronautical Study No. 2020-AWP-10586-OE.)

would not physically interfere with one's ability to evacuate in the event of an emergency. Therefore, the Project would not conflict with an adopted emergency response or evacuation plan. Impacts would be ***less than significant***.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires? (Less than Significant)

The Project site is in a highly urbanized setting with no nearby wildlands. It is also outside any Very High Fire Hazard Severity Zone of either a State Responsibility Area or Local Responsibility Area. Wildfire is unlikely to occur at the Project site. Impacts would be ***less than significant***.

X. Hydrology and Water Quality

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
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 that would:				
	1. Result in substantial erosion or siltation onsite or offsite;	☐	☐	☒	☐
	2. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite;	☐	☐	☒	☐
	3. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
	4. Impede or redirect floodflows?	☐	☐	☒	☐
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Setting

The Project site is within the San Francisco Bay watershed, which encompasses 202,981 acres, including San Francisco Bay.[87] Stormwater runoff from the Project site ultimately drains into San Francisco Bay. Sanchez Channel and the Burlingame Lagoon, also known as the Bay Front Channel, are on the eastern and

[87] University of California, Davis. n.d. *California Water Indicators Portal – San Francisco Bay*. Available: https://indicators.ucdavis.edu/cwip/huc/1805000410. Accessed: February 16, 2021.

southern sides of the Project site; San Francisco Bay is less than 1 mile north of the Project site. Lower San Francisco Bay is impaired for chlordane, dichlorodiphenyltrichloroethane (DDT), dieldrin, dioxin compounds, furan compounds, invasive species, mercury, PCBs, and trash.[88]

Local drainage is managed by storm drain infrastructure. Stormwater runoff from the Project site drains to a pump station on the south side of the site where it is collected and pumped to Burlingame Lagoon.

The Project site consists of approximately 2.12 acres of pervious surfaces and 8.72 acres of impervious surfaces.[89] The site is relatively flat, with grades between 4 and 12 feet, relative to NAVD 88 datum. The site slopes gently to a low-lying area at the midpoint of the property line.

The City, which participates in the San Mateo Countywide Pollution Prevention Program (SMCWPPP), is required to implement low-impact development (LID) best management practices (BMPs) under the San Francisco Bay Region Municipal Regional Stormwater NPDES permit (Order No. R2-2015-0049, NPDES Permit No. CAS612008). This NPDES permit is also known as the San Francisco Bay MRP. The permit continues in force and effect until a new permit is issued or the permit is rescinded. Provision C.3 of the MRP is directly applicable to the Project. This provision allows permittees to include appropriate source-control, site-design, and stormwater-treatment measures in new development as well as redevelopment projects to address both soluble and insoluble stormwater runoff pollutant discharges and prevent increases in runoff flows from both new development and redevelopment projects. This goal is to be accomplished primarily through implementation of LID techniques. LID practices include source-control BMPs, site-design BMPs, and stormwater-treatment BMPs, either onsite or at a joint stormwater treatment facility.

The city of Burlingame is within the Westside Groundwater Basin.[90] Groundwater depth at the site was observed at approximately 2.8 to 20 feet bgs; however, because of the low site elevation and proximity to San Francisco Bay, the highest groundwater depth is estimated to be approximately 1 foot bgs.[91] The Westside Groundwater Basin is designated as a Very Low Priority Area, per the Sustainable Groundwater Management Act.[92] The South Westside Basin Groundwater Management Plan, which is a voluntary groundwater management plan, ensures a sustainable, high-quality, reliable water supply through local groundwater management for beneficial uses. Groundwater is not a supply or recharge source in the basin.

The Project site is predominantly within the 100-year floodplain. Specifically, it lies within Federal Emergency Management Agency (FEMA) Flood Zone AE, which has a base flood elevation of 10.0 feet. However, the eastern and southern sides of the Project site, including sections of the Bay Trail, are within Flood Zone X. Flood Zone X is the area between the limits of the 100-year and 500-year floodplains, in areas of moderate flood hazard (areas with a 0.2 percent annual chance of flooding). The southeastern portion of the Project site is outside the floodplain.[93]

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88 State Water Resources Control Board. 2018. *Final 2014/2016 California Integrated Report (Clean Water Act Section 303(d) List/305(b) Report).* EPA approved: April 6, 2018. Available: https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml. Accessed: February 16, 2021.

89 BKF. 2020. *Burlingame Bay – Hydrology Analysis Memorandum.* BKF No. C20191138-10. April 3.

90 Department of Water Resources. n.d. *SGMA Basin Prioritization Dashboard*. Available: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed: February 16, 2021.

91 Romig Engineers. 2020. *Burlingame Bay Office Building and Parking Structure, 555 and 577 Airport Boulevard Burlingame, California.* Project No. 5047-1. April.

92 Department of Water Resources. n.d. *SGMA Basin Prioritization Dashboard*. Available: https://gis.water.ca.gov/app/bp-dashboard/final/. Accessed: February 16, 2021.

93 Federal Emergency Management Agency. 2019. *National Flood Hazard Layer FIRM 06081C0154G*. April 5.

Coastal and low-lying areas, such as the Project site, are particularly vulnerable to sea-level rise. Sea-level rise is a concern for the future, particularly in combination with storm events and coastal flooding. A scenario with 100-year high tides, taking into account sea-level rise over a 50- or 100-year horizon, would dramatically increase the risk of flooding in the Project vicinity.[94]

A tsunami is a series of ocean waves caused by displacement of a large volume of water, typically as a result of an undersea earthquake or landslide. The southern portion of the Project site is subject to inundation from a tsunami.[95] San Francisco Bay is a large, open body of water with no immediate risk of seiche. Large waves generated in the Pacific Ocean undergo considerable refraction and diffraction upon passing through the Golden Gate, resulting in greatly reduced heights when they reach the Project site. Flood risks from a seiche event would be minimal in the Project vicinity.

Burlingame General Plan EIR

The Burlingame General Plan EIR concluded that violations of water quality standards due to urban runoff can be prevented through continued implementation of existing regional water quality regulations and successful implementation of the City's local water quality control standards, which are imposed on new development over the long term. The Burlingame General Plan would not interfere with implementation of water quality regulations and standards. Per the Burlingame General Plan EIR, the following goals and policies from the Healthy People and Healthy Places Element and the Infrastructure Element would reduce the impacts of future projects to less-than-significant levels: Goal HP-6, Policy HP-6.1, Policy HP-6.3, Policy HP-6.5, Policy HP-6.6, and Policy HP-6.7, and Goal IF-4, Policy IF-4.1, Policy IF-4.2, Policy IF-4.4, Policy IF-4.5, Policy IF-4.6, and Policy IF-7.

Discussion

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? (Less than Significant)

Construction of the Project would involve ground-disturbing activities, such as excavation. Construction activities have the potential to generate runoff that contains sediments and other pollutants, which could degrade water quality if not properly controlled. Sources of pollution associated with construction also include chemical substances from construction materials as well as hazardous or toxic materials, such as fuels or chemicals. The Project would be subject to state and federal hazardous materials laws and regulations, which are discussed in more detail in Section IX, *Hazards and Hazardous Materials*. Such laws and regulations would minimize risks associated with affecting the quality of surface water and groundwater.

More than 1 acre of soil would be disturbed by the Project; therefore, the Project site, which covers 12.83 acres, would be subject to the Construction General Permit. Furthermore, the Project would be required to comply with the MRP. Erosion control requirements are specified in the Construction General Permit and the MRP. These requirements include preparation and implementation of a SWPPP that contains BMPs. The SWPPP would identify potential sources of sediment and other pollutants and prescribe BMPs to ensure that potential adverse erosion, siltation, and contamination

[94] California Natural Resource Agency. 2018. *State of California Sea-Level Rise Guidance 2018 Update*. Available: http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf. Accessed: January 20, 2021.

[95] California Emergency Management Agency, the University of Southern California, and the California Geological Survey. 2009. *Tsunamic Inundation Map for Emergency Planning*. State of California, County of San Mateo. San Mateo Quadrangle. June 15.

impacts would not occur during construction activities. Implementation of a SWPPP and BMPs would control erosion and protect water quality from potential contaminants in stormwater runoff from the construction site. BMPs may include covers, drains, and storage procedures for outdoor storage areas; temporary cover for disturbed surfaces; and sediment basins or traps, earthen dikes or berms, silt fences, check dams, soil blankets or mats, covers for stock piles, or other BMPs to trap sediments. Such BMPs would help to protect surface water and groundwater quality.

Groundwater dewatering during construction is anticipated. However, dewatering would be temporary, and water quality permits, as required by the San Francisco Bay Regional Water Quality Control Board (RWQCB), would be obtained prior to dewatering. Small amounts of uncontaminated construction-related dewatering are covered under the Construction General Permit; therefore, additional dewatering permits may not be required. The San Francisco Bay RWQCB has regulations specific to dewatering; the regulations typically involve reporting and monitoring. All monitoring and reporting requirements for dewatering would be met, ensuring that water quality would not be affected.

Dewatering methods include options for discharges to surface waters through storm drains, in compliance with waste discharge requirements. If it is found that the groundwater does not meet water quality standards, it must either be treated as necessary prior to discharge so that all applicable water quality objectives, as designated in the San Francisco Bay Basin Plan (Basin Plan), are met or hauled offsite for treatment and disposal at an appropriate waste treatment facility that is permitted to receive such water. For water to be discharged to San Francisco Bay, the San Francisco Bay RWQCB would need to be notified. Discharges would be monitored and treated as needed to comply with RWQCB requirements related to water quality.

Through compliance with the Construction General Permit and San Francisco Bay RWQCB water quality requirements, as well as implementation of the SWPPP and associated BMPs, construction activities would have a less-than-significant impact.

Pollutants in stormwater runoff from urban development, such as the Project, have the potential to violate water quality standards if the types and amounts are not adequately controlled or reduced. Stormwater runoff from the types of urban uses that would result from the Project is regulated under the MRP. The Project Sponsor would be required to submit the SMCWPPP checklist to the City to show compliance with NPDES regional permit requirements. BMPs included in site designs and plans for the Project would be reviewed by the City's engineering staff to ensure appropriateness and adequate design capacity prior to permit issuance. The San Francisco Bay RWQCB has incorporated requirements in the MRP to protect water quality and approved the SMCWPPP, which is in compliance with the NPDES municipal stormwater permit. The City review and permitting process would ensure that the permit's waste discharge requirements would not be violated by the Project.

Implementation of the Project would not change the amount of impervious surface cover. Pervious surfaces would remain at approximately 2.12 acres, and impervious surfaces would cover 8.72 acres. The Project would provide new landscaped areas, including stormwater treatment areas. Vegetation would be derived from a combination of drought-tolerant native and adaptive plants. The plant palette would coordinate with Provision C.3 treatment measures; therefore, bioretention areas would fit within the landscape design. These features would treat stormwater runoff through filtration. In addition, a treatment pump station would be added to direct runoff to treatment planters throughout the Project site. Because the Project would replace or alter more than 50 percent of existing impervious surfaces at the site, the Project would be required to provide

treatment measures for all impervious surfaces (e.g., on-grade flow-through planters). Flows from the parking structure and the remainder of the site would be treated with the use of treatment planters. The size of the planters would be based on local requirements but preliminarily sized at 4 percent of the impervious surface, as indicated by the site plan. In addition, a new pump station would direct runoff to treatment flows distributed throughout the remainder of the Project site. Final sizing would be documented in the Stormwater Management Plan to be submitted with the construction documents for the Project. Stormwater treatment measures implemented on the site would be in compliance with state and County of San Mateo requirements and Provision C.3 measures.

Based on the above, operation of the Project would not violate any waste discharge requirements or otherwise substantially degrade water quality. This impact was adequately addressed in the previous CEQA documents. Consistent with the prior conclusions, operation of the Project would have a ***less-than-significant*** impact.

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

The maximum depth of excavation is expected to be 10 to 12 feet. Therefore, temporary groundwater dewatering is anticipated during construction. However, no permanent groundwater dewatering would be required during operation. Currently, the site is predominantly developed. However, there would be no change in the amount of impervious surface area on the Project site and therefore no change in groundwater recharge. Approximately 24.3 percent of the site would be pervious surface area, the same as under existing conditions. In addition, landscaped areas, including stormwater treatment planters that promote infiltration by draining to pervious surfaces, would allow groundwater recharge.

The Project would not increase demands for groundwater supplies. Furthermore, the Project would comply with the regulations of the Water-Efficient Landscape Ordinance, as required. Groundwater would not be used for construction or operation because groundwater is not a supply source in the basin. Therefore, there would be no impact on the local aquifer. The Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that it would impede sustainable groundwater management within the basin, resulting in a ***less-than-significant*** impact.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:

1. Result in substantial erosion or siltation onsite or offsite? (Less than Significant)

2. Substantially increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite? (Less than Significant)

3. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff? (Less than Significant)

4. Impede or redirect floodflows? (Less than Significant)

During construction, stormwater drainage patterns could be temporarily altered. However, the Project would implement BMPs, as required in the SWPPP, to minimize the potential for erosion or siltation in nearby storm drains as well as temporary changes in drainage patterns during construction. Construction BMPs would capture and infiltrate small amounts of sheet flow into the ground such that offsite runoff from the construction site would not increase, ensuring that drainage patterns would not be significantly altered. Measures required by the NPDES Construction General Permit would also limit site runoff during construction and would not alter stormwater drainage patterns. BMPs would be implemented to control construction site runoff, ensure proper stormwater control and treatment, and reduce the discharge of pollution to the storm drain system. Therefore, construction would not substantially alter the existing drainage pattern of the area in a manner that would result in substantial erosion or siltation or increase the rate or amount of surface runoff in a manner that would result in flooding onsite or offsite. In addition, the MRP provides practices to prevent polluted runoff during construction activities.

Currently, the Project site is predominantly developed. Implementation of the Project would not change the amount of impervious surface cover. Pervious surfaces would remain at approximately 2.12 acres, and impervious surfaces would cover 8.72 acres. As a result, the infill development would not increase runoff from the site. Peak stormwater runoff in a 10-year or 100-year storm event would remain the same with implementation of the Project as under existing conditions.[96]

The Project proposes to treat stormwater for the full site and include stormwater treatment controls, in compliance with the requirements of Provision C.3 of the MRP. The existing storm drain pump station, connected to Burlingame Lagoon, would continue to be used. The Project would modify portions of the onsite storm drain infrastructure. A treatment pump station would be added to direct runoff to treatment planters throughout the Project site. Because more than 50 percent of existing impervious surfaces at the site would be replaced or altered, the Project would be required to provide treatment measures for all impervious surfaces using on-grade flow-through planters. Flows from the parking structure and the remainder of the site would be treated with the use of treatment planters. The planters would be sized to 4 percent of the impervious surface, as indicated by the site plan, which would be finalized in the Stormwater Management Plan. In addition, a new pump station would direct runoff to treatment flows distributed throughout the remainder of the site. These features would reduce runoff and treat stormwater through filtration, in compliance with state and County of San Mateo requirements. Therefore, the Project would not substantially alter existing drainage patterns or result in adverse impacts related to drainage capacity and associated impacts. The impact was adequately addressed in the previous CEQA documents. Consistent with the prior conclusions, the Project would have **less-than-significant** impacts.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? (Less than Significant)

The Project site is predominantly within the 100-year floodplain. Although the Project site is not subject to inundation by seiche, the southern portion of the Project site is subject to inundation from a tsunami.[97]

[96] BKF. 2020. *Burlingame Bay – Hydrology Analysis Memorandum.* BKF No. C20191138-10. April 3.

[97] California Emergency Management Agency, the University of Southern California, and the California Geological Survey. 2009. *Tsunamic Inundation Map for Emergency Planning*. State of California, County of San Mateo. San Mateo Quadrangle. June 15.

In the event of a flood hazard, to reduce the risk of a pollutant release, the Project would comply with the requirements of local water quality programs and associated municipal stormwater-related NPDES permits as well as Burlingame General Plan policies to manage flood risk and water quality. During construction activities, stormwater BMPs would be implemented, as required by federal, state, county, and local policies, to minimize degradation of water quality associated with stormwater runoff or construction-related pollutants. In addition, construction activities and operations would comply with local stormwater ordinances, stormwater requirements established by the MRP and SMCWPPP, and regional waste discharge requirements. Compliance with these requirements would minimize risks related to a release of pollutants due to Project inundation in a flood hazard, tsunami, or seiche zone. Stormwater treatment measures, including the use of landscaped areas and stormwater treatment planters, would also reduce the risk of pollutants during a storm event and meet Provision C.3 requirements. A treatment pump station would direct runoff to treatment planters throughout the Project site. Therefore, the Project would not result in a release of pollutants due to inundation, resulting in a ***less-than-significant*** impact. This impact was adequately addressed in the previous CEQA documents.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? (Less than Significant)

Commonly practiced BMPs, as required by the NPDES Construction General Permit, would be implemented to control construction site runoff and reduce the discharge of pollutants from stormwater and other nonpoint-source runoff to storm drain systems. As part of complying with permit requirements during ground-disturbing or other construction activities, water quality control measures and BMPs would be implemented to ensure that water quality standards would be achieved, including water quality objectives that protect designated beneficial uses of surface water and groundwater, as defined in the Basin Plan.

Construction would comply with the appropriate water quality objectives for the region, including the MRP, regarding runoff. The NPDES Construction General Permit requires stormwater discharges to be free of pollutants that cause or contribute to an exceedance of applicable water quality objectives or water quality standards, including designated beneficial uses. The City's review and permitting process would ensure that the permit's waste discharge requirements would not be violated by the Project. Implementation of the proposed stormwater treatment measures, as well as the incorporation of landscaping and raised stormwater treatment planters, would also reduce stormwater runoff flows and associated pollutants. Furthermore, Burlingame General Plan policies require groundwater resources to be protected, as required by a sustainable groundwater management plan. Groundwater in the basin is not a source for the water supply; therefore, Project operations would not increase demands for groundwater. In addition, new landscaped areas would include stormwater treatment areas.

Based on the above analysis, the Project would not conflict with or obstruct implementation of the Basin Plan or the South Westside Basin Groundwater Management Plan, resulting in **less-than-significant** impacts.

XI. Land Use and Planning

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Physically divide an established community?	☐	☐	☒	☐
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Setting

The Project site is within the Burlingame city limits and governed by the Burlingame General Plan and Burlingame Municipal Code. Burlingame is divided into a series of planning areas with a variety of land uses, including commercial, office, cultural, civic, and quasi-civic uses. Land uses in the vicinity of the Project site include recreational, commercial, office, restaurant, and parking uses.

The Burlingame General Plan has assigned the Project site a land use designation of Bayfront Commercial, which provides for both local and tourist-related commercial uses.[98] Permitted uses include higher-intensity office uses as well as entertainment venues, restaurants, hotels and motels, and retail establishments. In addition to public open spaces, this designation also allows existing open space easements to implement local and regional objectives related to trail plans, recreation, and habitat preservation. This is because the City aims to prioritize public access to the waterfront.

The Project site is also zoned AA under the Burlingame Municipal Code, which allows office uses, including R&D and associated laboratory uses as well as instructional activities. Building heights of up to 65 feet are permitted; however, no building or structure can exceed 40 feet within 100 feet of the Bay shoreline, as defined by the BCDC. Offices with a maximum FAR greater than 0.6, including R&D developments with associated laboratory uses, require a Conditional Use Permit.

Currently, the Project site is within Bay Park Plaza, which consists of two multi-tenant office buildings with a total of 259,733 sf. The five-story (69-foot-tall), 120,579 sf building at 555 Airport Boulevard was constructed in 1998. The eight-story (90-foot-tall), 139,154 sf building at 577 Airport Boulevard was constructed in 1983. The Project site also includes surface parking lots with 879 spaces, including 15 spaces dedicated to the BCDC and Bay Trail. Access to the site is currently provided from driveways on Airport Boulevard.

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to land use and planning with implementation of mitigation measures, standard conditions of approval, and/or Burlingame General Plan goals and policies. The Burlingame General Plan EIR concluded that development would

[98] City of Burlingame. 2019. *Burlingame General Plan*. November. Available: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/General%20and%20Specific%20Plans/BurlingameGP_Final_Nov2019_COMPLETE%20DOCUMENT.pdf. Accessed: January 14, 2021.

not result in significant impacts related to the division of established communities or conflicts with applicable plans, policies, and regulations. The following principles, goals, and policies contained in the Community Character Element of the Burlingame General Plan provide guidance on how land use designations should be developed to contribute to the overall character of Burlingame: Principle 1.a, Principle 1.b, Principle 1.c, and Principle 1.d, and Goal CC-4, Policy CC-4.1, CC-4.3, and CC-4.4.

Discussion

a. Physically divide an established community? (Less than Significant)

The Project would add both a 241,679 sf, eight-story office/R&D building and a 5.5-level parking structure to the existing site. The Project would not limit access to existing streets or bicycle/pedestrian pathways within the Project site or the surrounding community, including the Bay shoreline or the Bay Trail. Furthermore, the Project would not create new streets; rather, it would create new pedestrian pathways within the Project site that would ultimately improve pedestrian circulation throughout the site and in surrounding areas. Therefore, implementation of the Project would not result in physical division of an established community. The impact under the Project would be ***less than significant***.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (Less than Significant)

The Project site is designated Bayfront Commercial in the Burlingame General Plan and within the AA zoning district. The Burlingame General Plan is a legal document that is required by state law. It provides direction for development and the use of land in the city. All development in the city must conform to the land use designations outlined in the Burlingame General Plan. The Project would be consistent with existing land use designations. It would also include uses that would be consistent with those permitted under the Burlingame General Plan as well as the Burlingame Municipal Code. However, the Project would require a Conditional Use Permit pertaining to FAR and building height.

With the Conditional Use Permit, the Project would be consistent with the requirements set forth for development in the AA zoning district, which allows office uses, including R&D and associated laboratory uses as well as instructional activities. The Project would require a Conditional Use Permit for FAR, which would increase from 0.46 to 0.9. In addition, the Project would require a Conditional Use Permit for the proposed height. The AA zoning district allows a maximum height of 65 feet; the Project would have a maximum height of 133 feet. The Project would be consistent with all other zoning regulations, including those pertaining to use, setbacks, parking, view corridors, lot coverage, lot frontage, minimum lot size, landscaping, and trash and loading areas. Therefore, if the City were to approve the requested Conditional Use Permit for FAR and height increases, the Project would be consistent with the AA zoning designation.

The Burlingame General Plan includes various goals, policies, and implementation framework items pertaining to growth, development, design standards, and roadways and infrastructure in the city. The Burlingame General Plan also includes a vision specific to the Bayfront. It states that this area should be a regional recreation and business destination. In addition to the existing land use designation and zoning, numerous policies have been adopted for the purpose of reducing environmental impacts. In particular, the following goals and policies would apply to the Project:

- Goal CC-1: Incorporate sustainable practices in all development decisions.
    - Policy CC-1.2: Mixed-Use, Transit-Oriented Infill Development. Promote higher-density infill development with a mix of uses on underutilized parcels, particularly near transit stations and stops.
    - Policy CC-1.5: Transportation Demand Management. Require that all major development projects include a TDM program, as defined in the City's TDM regulations, to reduce single-occupancy car trips. "Major development" shall be defined in TDM regulations by square footage for commercial development or a minimum number of units for residential development.
    - Policy CC-1.10: Site Design. Establish sustainable site design standards that maintain and protect valuable stands of vegetation, minimize impacts of runoff on San Francisco Bay and local creeks, reduce water consumption, optimize buildings' solar orientation, and minimize the impact of new structures on wind movement.
- Goal CC-5: Maintain and promote the Bayfront area as a premier destination along San Francisco Bay for land- and water-based recreation, hospitality uses, creative industries, logistics support, water-based transit service, and local businesses that benefit from proximity to San Francisco International Airport.
    - Policy CC-5.1: Commercial Destinations. Support and encourage commercial uses along the waterfront that enliven the area and serve as destinations for residents and visitors, including hotels, restaurants, and entertainment venues.
    - Policy CC-5.4: Parks and Open Space. Preserve and enhance Bayfront parks and open spaces, and identify strategies to increase usage of recreational amenities.
    - Policy CC-5.5: Trail Connectivity. Coordinate with partner agencies to connect gaps in the Bay Trail, and require new waterfront development to improve and maintain trail segments along property lines.
- Goal CC-6: Establish a cohesive design character for the Bayfront area that protects views to the waterfront, encourages biking and walking, accommodates water-based recreation and ferry service, and addresses sea-level rise.
    - Policy CC-6.1: View Preservation. Ensure that new development preserves public views to the waterfront. Consider sightlines and viewsheds from Bayfront open spaces when planning future projects.
    - Policy CC-6.3: Infill Development. Encourage increased intensity through high-quality infill development on surface parking lots, and support the conversion of surface parking lots into active commercial and hospitality uses.
    - Policy CC-6.4: Design Character. Establish design standards that facilitate attractive interfaces between use types, enhance the public realm, and activate commercial districts. Prioritize pedestrian improvements and waterfront access.
- Goal HP-7: Protect local scenic resources, and preserve views of the natural amenities of the city.
    - Policy HP-7.3: City and County Scenic Roadways. Protect local scenic roadways by preserving mature trees wherever possible, maintaining landscaping along roadways, and ensuring that development and land uses do not detract from the aesthetics of the corridor. Consider establishing specific design guidelines for residential development, commercial development, and roadway signage along scenic corridors.

  - Policy HP-7.5: Connectivity to Recreational Amenities. Coordinate and identify connectivity opportunities between scenic routes and adjacent public recreation areas such as parks, scenic outlooks, and biking and hiking trails. Prioritize the development of separated bicycle lanes along scenic routes to connect with recreational trails.
  - Policy HP-7.7: Shoreline Views. Protect views to the Bay shoreline by identifying viewsheds to the Bay from key locations and restricting the height of buildings within these viewsheds. Ensure that new Bayfront development does not detract from the scenic qualities of the area, and consider adopting commercial and hotel design guidelines specific to the Bayfront.

- Goal ED-1: Maintain a diversified economic base that provides a wide range of business and employment opportunities and ensures a healthy and prosperous economy for generations to come.
  - Policy ED-1.1: Diverse Building Types and Sizes. Encourage development of new office, research, and technology spaces to diversify the types of businesses in Burlingame, focusing specifically on the Rollins Road, Bayfront, and downtown areas.
- Goal ED-2: Cultivate a business environment that supports long-established enterprises, attracts new and emerging businesses, and provides support for synergistic business relationships and partnerships.
  - Policy ED-2.10: Bayfront Office and Research and Development. Position the Bayfront area as a location for larger office-based and research and development businesses as a complement to the hospitality businesses.
- Goal M-1: Achieve and maintain a citywide circulation network that provides safe, efficient, and convenient mobility for all users and modes of transportation.
- Goal M-5: Implement TDM strategies that reduce overall vehicle trips and encourage the use of transportation modes that reduce vehicle miles traveled and greenhouse gas emissions.
- Goal M-7: Use parking management strategies that promote parking availability, housing affordability, congestion management, and improved air quality.

Given the nature of the Project, as previously described herein, the Project appears to be generally consistent with Burlingame General Plan goals and policies. However, it should be noted that the ultimate determination regarding consistency with the Burlingame General Plan will be made by the Planning Commission.

The ultimate findings regarding Burlingame General Plan consistency do not require the Project to be entirely consistent with each individual goal and policy. A project can be generally consistent with a general plan, even though the project may not promote every applicable goal and policy. A CEQA impact would occur only if a policy inconsistency were to result in a significant physical environmental impact. No such physical impact is associated with the Project's consistency with relevant policies and regulations. In conclusion, the Project would be generally consistent with Burlingame General Plan goals and policies, resulting in a ***less-than-significant*** impact.

XII. Mineral Resources

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Setting

Under the Surface Mining Control and Reclamation Act, the California Geological Survey is responsible for classifying land as a Mineral Resource Zone (MRZ), based on the known or inferred mineral resource potential of that land. According to available data, the Project site and the area surrounding the Project site have been classified as MRZ-1.[99] The California Department of Conservation, Division of Mines and Geology, defines MRZ-1 as follows:

> MRZ-1: Areas where adequate geologic information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence. This zone is applied where well-developed lines of reasoning, based on economic geologic principles and adequate data, indicate that the likelihood for any occurrence of significant mineral deposits is nil or slight.[100]

Burlingame General Plan EIR

The Burlingame General Plan EIR found no impacts related to mineral resources. No mitigation measures were warranted.

Discussion

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? (No Impact)

Because the Project site is identified as MRZ-1, it is not underlain by any known significant mineral deposits. Therefore, the Project would not result in the loss of availability of such resources, and there would be ***no impact***.

[99] California Department of Conservation. 1996. *Generalized Mineral Land Classification Map of the South San Francisco Bay Production—Consumption Region*. Map prepared by Susan Kohler-Antablin. California Department of Conservation, Division of Mines and Geology, Sacramento, CA. Accessed: January 7, 2021.

[100] California Department of Conservation. 2000. *Guidelines for Classification and Designation of Mineral Lands.* Available: https://www.conservation.ca.gov/smgb/Guidelines/Documents/ClassDesig.pdf. Accessed: January 7, 2021.

b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan? (No Impact)

The Project site is developed but not used for mineral recovery. Moreover, no known mineral resources, including locally important mineral resources, are known to exist within the Project site or the surrounding area. Therefore, the Project would not result in the loss of availability of such resources, and there would be ***no impact***.

XIII. Noise

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies?	☐	☒	☐	☐
b.	Generate excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c.	Be located in the vicinity of a private airstrip or airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the area to excessive noise levels?	☐	☐	☒	☐

Setting

Overview of Noise and Sound

Noise is commonly defined as unwanted sound that annoys or disturbs people and potentially has an adverse psychological or physiological effect on human health. Because noise is an environmental pollutant that can interfere with human activities, an evaluation of noise is necessary when considering the environmental impacts of a proposed project.

Sound is characterized by various parameters, including the rate of oscillation of sound waves (frequency), the speed of propagation, and the pressure level or energy content (amplitude). In particular, the sound pressure level is the most common descriptor used to characterize the loudness of an ambient (existing) sound level. Although the decibel scale, a logarithmic scale, is used to quantify sound intensity, it does not accurately describe how sound intensity is perceived by human hearing. The human ear is not equally sensitive to all frequencies in the spectrum; therefore, noise measurements are weighted more heavily toward frequencies to which humans are sensitive through a process referred to as A-weighting.

Human sound perception, in general, is such that a change in sound level of 1 decibel (dB) cannot typically be perceived by the human ear, a change in sound level of 3 dB is just noticeable, a change of 5 dB is clearly noticeable, and a change of 10 dB is perceived as doubling or halving the sound level. A doubling of the actual sound energy is required to result in a 3 dB (i.e., barely noticeable) increase in noise; in practice, this means that the volume of traffic on a roadway typically needs to double to result in a noticeable increase in noise.[101]

[101] California Department of Transportation. 2013. *Technical Noise Supplement to the Traffic Noise Analysis Protocol*. September.

The decibel level of a sound decreases (or attenuates) exponentially as the distance from the source of that sound increases. For a point source, such as a stationary compressor or construction equipment, sound attenuates at a rate of 6 dB per doubling of distance. For a line source, such as free-flowing traffic on a freeway, sound attenuates at a rate of 3 dB per doubling of distance. Atmospheric conditions, including wind, temperature gradients, and humidity, can change how sound propagates over distance and affect the level of sound received at a given location. The degree to which the ground surface absorbs acoustical energy also affects sound propagation. Sound that travels over an acoustically absorptive surface, such as grass, attenuates at a greater rate than sound that travels over a hard surface, such as pavement. The increased attenuation is typically in the range of 1 to 2 dB per doubling of distance. Barriers, such as buildings and topographic features that block the line of sight between a source and receiver, also increase the attenuation of sound over distance.

In urban environments, simultaneous noise from multiple sources may occur. Because sound pressure levels, expressed in decibels, are based on a logarithmic scale, they cannot be added or subtracted in the usual arithmetical way. Adding a new noise source to an existing noise source, with both producing noise at the same level, will not double the noise level. If the difference between two noise sources is 10 A-weighted decibels (dBA) or more, the higher noise source will dominate, and the resultant noise level will be equal to the noise level of the higher noise source. In general, if the difference between two noise sources is 0 to 1 dBA, the resultant noise level will be 3 dBA higher than the higher noise source, or both sources if both are equal. If the difference between two noise sources is 2 to 3 dBA, the resultant noise level will be 2 dBA above the higher noise source. If the difference between two noise sources is 4 to 10 dBA, the resultant noise level will be 1 dBA higher than the higher noise source.

Community noise environments are generally perceived as quiet when the 24-hour average noise level is below 45 dBA, moderate in the 45 to 60 dBA range, and loud above 60 dBA. Very noisy urban residential areas are usually around 70 dBA with respect to the community noise equivalent level (CNEL). Along major thoroughfares, roadside noise levels are typically between 65 and 75 dBA CNEL. Incremental increases of 3 to 5 dB to the existing 1-hour equivalent sound level (L_{eq}), or CNEL, are common thresholds for an adverse community reaction to a noise increase. However, there is evidence that incremental thresholds in that range may not be adequately protective in areas where noise-sensitive uses are located and the CNEL is already high (i.e., above 60 dBA). In those areas, limiting noise increases to 3 dB or less is recommended. Noise intrusions that cause short-term interior noise levels to rise above 45 dBA at night can disrupt sleep. Exposure to noise levels greater than 85 dBA for 8 hours or longer can cause permanent hearing damage.

Overview of Ground-borne Vibration

Ground-borne vibration is an oscillatory motion of the soil with respect to the equilibrium position. It can be quantified in terms of velocity or acceleration. Variations in geology and distance result in different vibration levels, including different frequencies and displacements. In all cases, vibration amplitudes decrease with increased distance.

The operation of heavy construction equipment creates seismic waves that radiate along the surface of and downward into the ground. These surface waves can be felt as ground vibration. Vibration from the operation of construction equipment can result in effects that range from annoyance for people to damage for structures. Perceptible ground-borne vibration is generally limited to areas within a few hundred feet of construction activities. As seismic waves travel outward from a vibration source, they cause rock and soil particles to oscillate. The actual distance that these particles move is usually only a

few ten thousandths to a few thousandths of an inch. The rate or velocity, expressed in inches per second, at which these particles move is the commonly accepted descriptor of vibration amplitude, peak particle velocity (PPV).

Vibration amplitude attenuates (or decreases) over distance. Attenuation is a complex function of how energy is imparted into the ground as well as the soil or rock conditions through which the vibration is traveling. Variations in geology can result in different vibration levels.

The potential impacts of vibration during construction were evaluated using the construction vibration modeling methods recommended by the U.S. Department of Transportation. The California Department of Transportation (Caltrans) provides guidelines regarding vibration associated with construction and the operation of transportation infrastructure.[102] Table 3-13 provides the Caltrans vibration guidelines regarding potential damage for different types of structures.

Ground-borne vibration and noise can also disturb people. Numerous studies have been conducted to characterize the human response to vibration, which are discussed in Federal Transit Administration (FTA) and Caltrans guidance. People are generally more sensitive to vibration during nighttime hours when they are sleeping than in the daytime. Vibration from frequent intermittent sources may be distinctly perceptible at a PPV of 0.04 inch per second (in/sec) and strongly perceptible at a PPV of 0.10 in/sec.[103]

Table 3-13. Caltrans Vibration Guidelines for Potential Damage to Structures

	Maximum Peak Particle Velocity (PPV, in/sec)	
Structure Type and Condition	**Transient Sources**	**Continuous/Frequent Intermittent Sources**
Extremely fragile historic buildings	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some older buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, 2020.

Existing Noise Environment

Noise-Sensitive Land Uses

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound could adversely affect use of the land. Noise-sensitive land uses typically include residential areas, hospitals, hotels, and schools. Recreational areas where quiet is an important part of the environment may also be considered sensitive to noise in some cases. Commercial uses may be considered noise sensitive as well if they include outdoor areas of frequent use, such as outdoor dining areas.

[102] California Department of Transportation. 2020. *Transportation and Construction Vibration Guidance Manual*. April.

[103] Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment Manual*. (FTA Report No. 0123.) Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed: March 20, 2021.

Land uses north and east of the Project site include commercial and office buildings with no apparent outdoor use areas. The nearest noise-sensitive use is the Bayfront Hilton, about 100 feet from the site's northwest boundary. A segment of the Bay Trail along the southern shoreline of San Francisco Bay is adjacent to the Project site; another shoreline trail is found to the east. The trails are associated with transitory uses and not considered noise sensitive. Across Burlingame Lagoon, a 10-lane segment of US 101 is about 650 feet from the southern boundary of the Project site. A noise barrier extends along southbound US 101, with an approximate height of 12 feet. Rows of single-family residences are found to the south, beyond the noise barrier.

Noise Sources

Existing noise sources in the Project area include traffic on the 10-lane segment of US-101, local traffic on Airport Boulevard, and aircraft operations from SFO. According to the Burlingame General Plan, existing noise levels from traffic on US 101 were calculated to be about 83.1 dBA CNEL at a distance of 100 feet. At residential receptors south of US 101, traffic noise levels were calculated to be 70.4 dBA CNEL because of the noise barrier along the shoulder of southbound US 101.[104] Noise monitoring was conducted at one location along Airport Boulevard between Anza Boulevard and Bay View Place for the Burlingame General Plan EIR in October 2017. Noise levels were in the range of 64.2 to 65.2 dBA L_{eq} (10 minutes) and considered to be representative of daytime noise levels associated with commercial and airport-related land uses in the area.

Regulatory Setting

There are no federal noise standards that are directly applicable to the Project. With regard to state regulations, California Code of Regulations Title 24, Part 2, establishes minimum noise insulation standards to protect persons in hotels, motels, dormitories, long-term care facilities, apartments, and dwellings other than single-family residences. Under this regulation, interior noise levels attributable to exterior noise sources cannot exceed 45 dBA CNEL, day-night level, in any habitable room. When such land uses are in an environment where exterior noise is 60 dBA CNEL or greater, an acoustical analysis is required to ensure that interior levels will not exceed the 45 dBA CNEL interior standard.

Regarding local noise standards, two regulatory sources are applicable to the Project, the Burlingame General Plan and the Burlingame Municipal Code. The applicable noise standards from these two sources are described below.

Burlingame General Plan

Chapter 8, Community Safety Element, of the Burlingame General Plan establishes noise and land use compatibility standards to guide new development. The overall goal of the element is to protect residents from excessive construction noise and vibration as well as increases in permanent ambient noise from individual projects. The goals and policies require assessments as well as minimization of potential noise impacts on sensitive receptors, thereby reducing impacts to less than significant. The policies relevant to the Project include:

- Locating noise-sensitive uses away from major sources of noise (Policy CS-4.1);
- Requiring the design of both new residential development and office development to comply with protective noise standards (Policies CS-4.2 and CS-4.3, respectively);

[104] City of Burlingame. 2018. *Envision Burlingame General Plan.*

- Monitoring noise impacts from aircraft operations at SFO as well as noise at Mills-Peninsula Medical Center (Policy CS-4.7);
- Requiring the evaluation and, if necessary, mitigation of airport noise impacts if a project is within the 60 dBA CNEL contour line of SFO (Policy CS-4.8);
- Complying with real estate disclosure requirements pertaining to existing and planned airports within 2 miles of any sale or lease of a property (Policy CS-4.9);
- Requiring development projects that are subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and minimize impacts consistent with the Burlingame Municipal Code (Policy CS-4.10); and
- Requiring a vibration impact assessment for projects that would use heavy-duty equipment and be within 200 feet of an existing structure or sensitive receptor (Policy CS-4.13).

Also in the Community Safety Element of the Burlingame General Plan are noise compatibility criteria for each category of land use in the city. Noise levels between 60 and 70 dBA CNEL are considered conditionally acceptable at multi-family residential land uses. Therefore, new development should be undertaken only after a detailed analysis of the noise reduction requirements is conducted and noise insulation features have been included in the design. Land uses that are less noise sensitive, such as commercial and industrial uses, are considered compatible with higher levels of outdoor noise.

Burlingame Municipal Code

The Building Construction section of the Burlingame Municipal Code establishes hours for construction in the city. Section 18.07.110 states that no person shall erect, demolish, alter, or repair any building or structure outside the hours of 8:00 a.m. to 7:00 p.m. on weekdays or 9:00 a.m. to 6:00 p.m. on Saturdays; no construction shall take place on Sundays or holidays, except under circumstances of urgent necessity in the interest of public health and safety. An exception, which must be approved in writing by a building official, shall be granted for a period of no more than 3 days for structures with a gross floor area of less than 40,000 square feet when reasonable to accomplish erection, demolition, alteration, or repair work; the exception shall not exceed 20 days for structures with a gross floor area of 40,000 square feet or more.

The Burlingame Municipal Code also contains standards that limit noise levels from mechanical equipment such as air conditioners and generators at the property line of an associated land use. These limits are 60 dBA during the daytime hours of 7:00 a.m. to 10:00 p.m. and 50 dBA during the nighttime hours of 10:00 p.m. to 7:00 a.m. (Section 25.58.050).

Discussion

a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in a local general plan or noise ordinance or applicable standards of other agencies? (Less than Significant with Mitigation)

Construction Noise

The use of heavy equipment during demolition and construction at the Project site would generate noise and increase ambient noise levels at adjacent land uses. The significance of potential noise impacts resulting from site demolition and construction would depend on the types of construction equipment used, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive receptors. To determine potential noise levels during

construction, standard FTA source noise levels for construction equipment were used to calculate the overall noise level for each phase of construction. The noise level for each equipment type, based on FTA data for the equipment that is expected to be used for Project construction, is provided in Table 3-14.

Table 3-14. Commonly Used Construction Equipment Noise Emission Levels

Equipment	Typical Noise Level (dBA) 50 Feet from Source
Heavy truck	84
Excavator	85
Bulldozer	85
Tower crane	88
Pump	77
Generator	82
Concrete mixer	85
Grader	85
Roller	85
Paver	85
Rock drill	95

Source: Federal Transit Administration, 2018.
dBA = A-weighted decibel.

To provide a reasonable worst-case analysis of potential noise impacts from concurrent use of pieces of heavy equipment during Project construction, noise modeling was conducted to determine the noise level, by distance, from the noise source. The modeling assumed that the two loudest pieces of equipment proposed for use during each phase of construction would operate simultaneously and at the same location on the Project site. The combined noise level, in terms of L_{eq}, from the use of equipment during each phase of construction is shown in Table 3-15.

Table 3-15. Construction Noise Levels by Activity and Distance to Allowable Sound Levels

Construction Activity	Equipment Used[a]	Combined Source Level at 50 Feet (L_{eq}, dBA)[b]	Combined Source Level at 100 Feet (L_{eq}, dBA)[b]	Combined Source Level at 200 Feet (L_{eq}, dBA)[b]	Combined Source Level at 500 Feet (L_{eq}, dBA)[b]	Combined Source Level at 1,000 Feet (L_{eq}, dBA)[b]
Demolition	Bulldozer, excavator	85	79	73	65	59
Foundation	Augur drill, truck	90	84	78	70	64
Superstructure	Tower crane, truck	86	80	74	66	60
Building skin	Tower crane, truck	86	80	74	66	60
Interior buildout	Lift, truck	84	78	72	64	58
Site finishes	Roller, paver	85	79	73	65	59

Note: Distance calculations do not include the effects, if any, of local shielding from walls, topography, or other barriers, which may further reduce sound levels.
L_{eq} = equivalent sound level; dBA = A-weighted decibel.
a. The two loudest pieces of equipment that may operate at one location simultaneously.
b. Based on usage factors of 25 to 50 percent for the types of equipment used.

The nearest noise-sensitive use is the Bayfront Hilton, which is across Airport Boulevard and about 125 feet away from the northern limits of construction. At this location, construction noise levels could reach a maximum of 79 dBA L_{eq} during site demolition, which would be the loudest phase of construction. A noise level of this magnitude would be readily noticeable above ambient levels at this location. At a distance of 50 feet, the loudest phase of construction would very likely occur during the foundation phase, during periods of pile drilling, and could reach a noise level of 90 dBA L_{eq} at 50 feet. However, there are no noise-sensitive uses at this distance from the building foundation.

As described above, construction could result in a noticeable increase in ambient noise levels at the hotel and the office buildings surrounding the Project site. However, construction generally would occur only during the daytime hours of 7:00 a.m. to 5:00 p.m. The hour of 7:00 a.m. to 8:00 a.m. is outside City of Burlingame– (City-) allowed work hours. Should nighttime work be required, approval would be obtained from the City. Because work would occur outside the City-allowed hours of 8:00 a.m. to 7:00 p.m. and may occur during nighttime hours, this impact is considered to be significant. Implementation of Mitigation Measure NOI-1 would reduce this impact to ***less than significant with mitigation***.

Mitigation Measure NOI-1. Implement Best Noise Control Practices during Construction

Best practices to minimize construction noise include the following:

- Limiting heavy equipment use to daytime hours not regulated by the City (i.e., between 8:00 a.m. and 7:00 p.m. Monday to Friday and 9:00 a.m. to 6:00 p.m. on Saturday);
- Locating stationary equipment (e.g., generators, pumps, cement mixers, idling trucks) as far as practical from noise-sensitive land uses;
- Requiring that all construction equipment powered by gasoline or diesel engines have sound-control devices such as exhaust mufflers that are at least as effective as those originally provided by the manufacturer and that all equipment be operated and maintained to minimize noise generation;
- Using equipment powered by electric motors instead of gasoline or diesel-powered engines;
- Preventing excessive noise by shutting down idle vehicles or equipment;
- Using noise-reducing enclosures around noise-generating equipment;
- Constructing barriers between noise sources and noise-sensitive land uses or taking advantage of existing barrier features (e.g., buildings) to block sound transmission to noise-sensitive land uses (the barriers should be designed to obstruct the line-of-sight between the noise-sensitive land use and onsite construction equipment); and
- Notifying adjacent residents in advance of construction work.

Operation

Parking Garage

For parking facilities, FTA specifies the screening distances for analysis.[105] The most conservative screening distance for the assessment of parking garages is 125 feet. The nearest noise-sensitive use is the hotel on Airport Boulevard, about 375 feet from the location for the new parking garage. No noise-sensitive receptors lie within the screening distance; therefore, a noise assessment of the facility is not required, according to FTA. Noise impacts from operation of the parking garage would be ***less than significant***.

Traffic

During operation, traffic would increase on roadways in the vicinity as employees and visitors travel to and from the Project site. A 100 percent increase (i.e., a doubling) in average daily traffic correlates to a 3 dB increase in noise. As discussed above, an increase of 3 dB is just noticeable by the human ear; therefore, an increase of less than 3 dB is not considered a substantial increase. An increase threshold of 3 dB is used in this analysis for evaluating traffic noise impacts, consistent with Chapter 15 of the Burlingame General Plan EIR.

Traffic noise levels were calculated using peak-hour traffic volume data provided by the Project traffic consultant as well as the traffic noise emissions in the data tables developed by the Federal Highway Administration from the Traffic Noise Model, version 2.5. As shown in Table 3-16, traffic noise levels at modeled receiver locations under existing plus-Project conditions are predicted to be in the range of 58 to 62 dBA CNEL, accounting for all types of land uses in the study area. Under cumulative conditions, traffic noise levels are predicted to range from 60 to 63 dBA CNEL, as shown in Table 3-17.

With respect to background conditions, which represent traffic growth from projects that are approved but not yet constructed, traffic volumes in the Project area would increase because of the approved projects. Under background conditions, the Project would result in an increase in noise of up to 1 dB, which would not be noticeable by people. Traffic volume data were also provided for a cumulative scenario. The data correspond to cumulative growth in the city and are based on Burlingame General Plan development assumptions. This scenario includes development throughout the greater area, including the city and surrounding communities. The cumulative condition accounts for increased traffic volumes from other planned development in the area both without the Project (i.e., a cumulative no-Project scenario) and with the Project (i.e., a cumulative plus-Project scenario).

[105] The FTA noise impact analysis is a multi-step process for evaluating a project's potential noise impacts with respect to FTA National Environmental Policy Act approvals, as outlined in the *Transit Noise and Vibration Impact Assessment Manual*. The FTA guidance for assessment is frequently applied to California Environmental Quality Act impact analyses. The screening criteria developed by FTA are used to determine the need for a detailed assessment of transit systems and associated facilities, including parking facilities.

Table 3-16. Predicted Traffic Noise Levels, Existing and Background Conditions

Roadway	Segment Location	Existing CNEL	Existing plus-Project CNEL	Increase, Existing plus-Project minus Existing (dB)	Background CNEL	Background plus-Project CNEL	Increase, Background plus-Project minus Background (dB)
Airport Boulevard	Old Bayshore Highway to Anza Boulevard	61	62	+1	63	63	0
Airport Boulevard	Anza Boulevard to Project Driveway West	61	62	+1	63	63	0
Airport Boulevard	Project Driveway West to Project Driveway East	60	60	0	62	62	0
Airport Boulevard	East of Project Driveway East	61	62	+1	63	63	0
Anza Boulevard	South of Airport Boulevard	57	58	+1	57	58	+1

Table 3-17. Predicted Traffic Noise Levels, Cumulative Conditions

Roadway	Segment Location	Cumulative No-Project CNEL	Cumulative plus-Project CNEL	Increase (dB)
Airport Boulevard	Old Bayshore Highway to Anza Boulevard	63	63	0
Airport Boulevard	Anza Boulevard to Project Driveway West	63	63	0
Airport Boulevard	Project Driveway West to Project Driveway East	60	60	0
Airport Boulevard	East of Project Driveway East	61	62	+1
Anza Boulevard	South of Airport Boulevard	61	62	+1

Based on the data in Tables 3-16 and 3-17, traffic volumes would increase by 1 dB or less under existing plus-Project, background plus-Project, and cumulative plus-Project conditions. An increase of this magnitude would not be noticeable. Therefore, the impact of traffic noise under Project conditions would be ***less than significant***.

HVAC Equipment

The new building at the Project site would require heating, ventilation, and air-conditioning (HVAC) systems. Although specific noise-level data for this type of equipment are not available, typical HVAC equipment can produce sound levels in the range of 70 to 75 dBA at 50 feet, depending on the size of the equipment. Noise from rooftop HVAC units would attenuate over distance from the source and be shielded by the edges of the new buildings. Building equipment is required to not exceed the applicable noise limits at the property line (i.e., 60 dBA during daytime hours or 50 dBA during nighttime hours). Under a conservative scenario, HVAC equipment may produce a noise level of about 55 dBA at the property line facing Airport Boulevard. Given that the nearest new building façade would be approximately 500 feet away from the hotel on Airport Boulevard, which is the nearest sensitive receptor, noise levels from HVAC equipment would not be noticeable at this location. However, depending on the HVAC specifications for the buildings, noise-attenuating treatments may be required to meet City noise limits at the property line. This impact could be significant. Mitigation Measure NOI-2 would require acoustical treatments for HVAC equipment to reduce noise to levels below the City noise limits. This impact would be ***less than significant with mitigation***.

Emergency Generator

An emergency generator would be installed to serve new buildings on the Project site. The generator would produce noise on a temporary basis and be used only during power outages and routine testing; such testing is generally done once or twice a year. Generators for buildings are typically housed within a sound-attenuating enclosure. Sound levels produced by emergency generators vary, based on the type of generator, placement, and noise attenuation from the generator enclosure.

The emergency generator would be required to comply with the 60 dBA City noise limit at the property line during the daytime hours of 7:00 a.m. to 10:00 p.m. and 50 dBA during the nighttime hours of 10:00 p.m. to 7:00 a.m. It is unlikely that operation of the generator would cause noticeable noise at the nearest noise-sensitive land uses. The hotel is about 100 feet from the limit of construction on the northwest side of the Project site; the new building would provide substantial acoustical shielding relative to the hotel. As such, noise from the generator is unlikely to be audible at the hotel. Under a worst-case scenario, noise from the generator may exceed 60 dBA at the southern property line during daytime hours or 50 dBA during nighttime hours. The southern property line faces only the Bay Trail and the channel that separates the site from US 101. However, a noise-attenuating enclosure would reduce the effects of emergency generator noise for people accessing the new buildings or the Bay Trail. This impact could be significant. Mitigation Measure NOI-2 would require a noise-attenuating enclosure for the proposed emergency generator to reduce noise to a level that would be below the City noise limit. The impact would be ***less than significant with mitigation***.

Mitigation Measure NOI-2: Provide Acoustical Treatments for Building Mechanical Equipment

As required, the applicant shall provide acoustical treatments for building mechanical equipment, such as the HVAC system and emergency generator, to ensure that noise levels do not exceed the City daytime noise level limit of 60 dBA L_{eq} or the nighttime noise limit of 50 dBA L_{eq} at the property line. Required performance standards for acoustical treatments can be specified by a qualified acoustical consultant. Treatments include, but are not limited to:

- Constructing enclosures around noise-generating mechanical equipment,
- Using mufflers or silencers on equipment exhaust fans, and
- Limiting the testing of emergency generators to daytime hours (7:00 a.m. to 10:00 p.m.).

b. Generate excessive ground-borne vibration or ground-borne noise levels? (Less than Significant)

Construction of Project buildings and the parking lot would involve the use of standard heavy equipment. Impact pile drivers would not be used during construction. Non-impact equipment types, such as bulldozers, generate perceptible levels of vibration within about approximately 25 feet of the equipment. Table 3-18 summarizes the typical vibration levels generated by construction equipment at a reference distance of 25 feet as well as greater and lesser distances.

Table 3-18. Vibration Source Levels for Construction Equipment

Equipment	PPV at 25 Feet	PPV at 50 Feet	PPV at 75 Feet	PPV at 100 Feet
Pile driver (sonic)	0.170	0.0601	0.0327	0.0213
Large bulldozer	0.089	0.0315	0.0171	0.0111
Hoe ram	0.089	0.0315	0.0171	0.0111
Caisson drill	0.089	0.0315	0.0171	0.0111
Loaded trucks	0.076	0.0269	0.0146	0.0095
Jackhammer	0.035	0.0124	0.0067	0.0044
Small bulldozer	0.003	0.0011	0.0006	0.0004

Source: Federal Transit Administration, 2018.

There are no sensitive receptors within 25 feet of the Project site; however, the construction area would include the entrances to the Project site from Airport Boulevard. The limit of construction at the eastern entrance to the site would be as close as 10 feet from the western façade of the office building at 411 Airport Boulevard. However, the limit of site grading would be more than 100 feet from the southern façade of the building, and any use of heavy equipment within this area would be limited to landscaping operations on the site.

During parking lot construction, vibratory rollers may be used to roll asphalt. Rollers produce a PPV of 0.04 inch/sec at up to 75 feet from the source. This may produce a perceptible level of vibration within adjacent commercial structures on an intermittent basis, but the effect would be short term. Vibration at this level would occur for only a short period of time (i.e., while the roller is in motion across the surface of the asphalt). Construction of the building and parking lots would be short term. The use of heavy equipment would cease once construction is complete. Because no high-impact

equipment would be used and heavy equipment would be more than 25 feet away from existing buildings, vibration from equipment is not expected to result in building damage. Impacts due to vibration are considered to be ***less than significant***. No mitigation is required.

c. Be located within the vicinity of a private airstrip or airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport and expose people residing or working in the area to excessive noise levels? (Less than Significant)

The Project site lies within SFO Airport Influence Area B. The nearest runway at SFO is 1.8 miles from the Project site, and its flight path extends in a southeasterly direction over San Francisco Bay. The Project site is well outside the 65 dBA CNEL contour. As such, no exceedances of Federal Aviation Administration criteria within the Project site are expected. The Project would add office buildings and business commercial uses. For such uses, 65 dBA CNEL is considered normally acceptable and between 65 and 75 dBA CNEL is considered conditionally acceptable, assuming construction of the new buildings would employ conventional construction methods and air-conditioning systems would be installed. There are no private airstrips or general aviation airports within 2 miles of the Project site. For these reasons, this impact is considered to be ***less than significant***.

XIV. Population and Housing

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Setting

The Project site is developed with two multi-tenant office buildings totaling 259,733 sf and surface parking lots with 879 spaces, including 15 spaces dedicated to the BCDC and Bay Trail. The Project site currently has approximately 864 employees at the two buildings. No individuals currently reside at the Project site.

Population. According to the California Department of Finance, Burlingame had a population of approximately 30,320 as of January 1, 2020.[106] Table 3-19 shows ABAG population projections for the city, county, and Bay Area as a whole. As shown, the city population will increase by approximately 1,075 (3.6 percent) by 2025. Projections also indicate that population growth in Burlingame will exceed population growth in the county between 2020 and 2025 (2.5 percent) but be less than that of the Bay Area as a whole (4.6 percent).[107]

Table 3-19. Population Projections (2020 to 2025)

	2020	2025	Growth (2020–2025)
City	29,975	31,050	1,075 (3.6%)
County	796,925	816,460	19,535 (2.5%)
Bay Area	7,920,230	8,284,200	395,970 (4.6%)

Source: Association of Bay Area Governments. 2018. *Projections 2040.*

[106] California Department of Finance. 2020. *E-1 Population Estimates for Cities, Counties, and the State with Annual Percent Change—January 1, 2019 and 2020.* Sacramento, CA. May. Available: https://www.dof.ca.gov/Forecasting/Demographics/Estimates//E-1/. Accessed: January 15, 2021.

[107] Association of Bay Area Governments. 2018. *Projections 2040*. Accessed: January 15, 2021.

Housing. In 2019, the estimated number of housing units in the city was 12,697,[108] with an average size of 2.47 persons per household.[109] That same year, the city had a housing vacancy rate of approximately 4.3 percent (547 units).[110] In addition, the city had approximately 1.42 workers per worker household.[111]

Table 3-20 presents ABAG projections for households in the city, county, and Bay Area for 2020 to 2025. The number of households in the city is projected to grow from approximately 12,755 in 2020 to 13,190 units in 2025, an increase of approximately 3.4 percent. According to ABAG, the number of households in the county is projected to grow by approximately 2.1 percent, while the Bay Area is expected to grow by approximately 4.4 percent in 5 years.[112]

Table 3-20. Household Projections (2020 to 2025)

	2020	2025	Growth (2020–2025)
City	12,755	13,190	435 (3.4%)
County	284,260	290,330	6,070 (2.1%)
Bay Area	2,881,965	3,009,055	127,090 (4.4%)

Source: Association of Bay Area Governments. 2018. *Projections 2040.*

Employment. Table 3-21 presents ABAG projections for the number of jobs in the city, county, and Bay Area for 2020 to 2025. The number of jobs in the city is projected to increase by approximately 0.4 percent because of employment increases in the retail, government, construction, education, and financial sectors; decreases are projected in the manufacturing, wholesale, and transportation sectors. Overall, job growth in the city (0.4 percent) is expected to be lower than job growth in the county (4.0 percent) and the Bay Area (3.2 percent).[113] In Burlingame, the categories with the highest employment levels are transportation, warehousing, and utilities, representing nearly one-third of all jobs in the city. More than 11 percent of the jobs are in the arts, entertainment, recreation, and accommodation and food services.[114]

[108] U.S. Census Bureau. 2019. *Selected Housing Characteristics, Burlingame, California*. The 2015–2019 American Community Survey, 5-year Estimates, Data Profiles. ID DP04. Available: https://data.census.gov/cedsci/table?q=housing%20characteristics&g=1600000US0609066&y=2019&tid=ACSDP5Y2019.DP04&hidePreview=false. Accessed: January 15, 2021.

[109] U.S. Census Bureau. 2019. *Selected Social Characteristics, Burlingame, California*. The 2015–2019 American Community Survey, 5-year Estimates, Data Profiles. ID DP02. Available: https://data.census.gov/cedsci/table?q=worker%20per%20worker%20household&g=1600000US0609066&y=2019&tid=ACSDP5Y2019.DP02&hidePreview=false. Accessed: January 15, 2021.

[110] U.S. Census Bureau. 2019. *Selected Housing Characteristics, Burlingame, California*. The 2015–2019 American Community Survey, 5-year Estimates, Data Profiles. ID DP04. Available: https://data.census.gov/cedsci/table?q=housing%20characteristics&g=1600000US0609066&y=2019&tid=ACSDP5Y2019.DP04&hidePreview=false. Accessed: January 15, 2021.

[111] U.S. Census Bureau. 2019. *Selected Economic Characteristics, Burlingame, California*. The 2015–2019 American Community Survey, 5-year Estimates, Data Profiles. ID DP03. Available: https://data.census.gov/cedsci/table?q=DP03&g=1600000US0609066&tid=ACSDP5Y2019.DP03&hidePreview=false. Accessed: January 15, 2021.

[112] Association of Bay Area Governments. 2018. *Projections 2040*. Accessed: January 15, 2021.

[113] Ibid.

[114] City of Burlingame. 2015. *City of Burlingame: 2015–2023 Housing Element*. Adopted: January 5, 2015. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Housing%20Element%20-%20updated%202015.pdf. Accessed: January 15, 2021.

In 2019, approximately 16,440 city residents were employed.[115] Approximately 12 percent of employees worked and lived in Burlingame, while 22 percent worked in other cities around San Mateo County, 18 percent work in San Francisco, 10 percent worked in Santa Clara County, and 7 percent worked in the East Bay.[116]

Table 3-21. Job Projections (2020 to 2025)

	2020	2025	Growth (2020–2025)
City	32,335	32,465	130 (0.4%)
County	399,275	415,305	16,030 (4.0%)
Bay Area	4,136,190	4,267,760	131,570 (3.2%)

Source: Association of Bay Area Governments. 2018. *Projections 2040.*

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to population and housing as well as employment. No mitigation measures were warranted. Although development under the Burlingame General Plan would create new housing and employment opportunities that could lead to population growth, population increases were assumed to be distributed over an extended period of time and would not result in the displacement of housing or people.

Per the Burlingame General Plan EIR, the following goals and policies from the 2015–2023 Housing Element and the Community Character Element are applicable to reduce the impacts of future projects to less-than-significant levels: Program H (A-5), Program H (F-1), Program H (F-2), Program H (F-4), and Program H (F-11); Policy CC-1.2; Goal CC-4, Policy CC-4.1, Policy CC-4.3, Policy CC-4.4, Policy CC-4.9, Policy CC-8.4, Policy CC-9.2, Policy CC-10.1, Policy CC-11.3, and Policy CC-12.3.

Discussion

a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)? (Less than Significant)

Construction. Construction of the Project would increase construction employment directly; however, this would be temporary, occurring only during the 25-month construction period. The size of the construction workforce would vary during the different subphases of construction. The maximum average daily number of construction workers would be approximately 125 during the superstructure subphase. Given the relatively common nature of the anticipated construction, the demand for construction employment would most likely be met with the existing and future labor market in the city as well as San Mateo County. A substantial number of workers from outside the

[115] U.S. Census Bureau. 2019. *Selected Economic Characteristics, Burlingame, California*. The 2014–2018 American Community Survey, 5-year Estimates, Data Profiles. ID DP03. Available: https://data.census.gov/cedsci/table?q=economic%20characteristics&g=1600000US0609066&y=2019&tid=ACSDP5Y2019.DP03&hidePreview=false. Accessed: January 15, 2021.

[116] City of Burlingame. 2015. *City of Burlingame: 2015–2023 Housing Element*. Adopted: January 5, 2015. Available: https://www.burlingame.org/document_center/Planning/General%20and%20Specific%20Plans/Housing%20Element%20-%20updated%202015.pdf. Accessed: January 15, 2021.

city or county would not be expected to relocate, given the temporary nature of construction activities. Therefore, impacts associated with inducing substantial population growth during construction would be ***less than significant***.

Operation. Operation of the Project would not result in a direct population increase because no onsite residential units are proposed. However, the Project would result in approximately 880 office employees working on the site once the Project is fully operational. Because no existing buildings would be demolished, the Project would result in a net increase in the total number of employees at the Project site during operation (i.e., approximately 880 employees). This level of job growth represents approximately 2.7 percent of the projected number of jobs in the city by 2025, which is roughly when the Project would be fully operational.

Using the average number of workers per worker household for the city (1.42), the Project would potentially generate up to 620 new households. As discussed above, approximately 12 percent of all city residents also work in the city. The existing 12 percent of the city's workforce that also resides in the city was used to estimate the number of new workers who would be expected to seek and find housing in the city as a result of the Project. Therefore, approximately 74 of the projected employees at the Project site would be expected to live in the city.[117] Assuming each employee forms a household with the city average of 2.47 persons, the Project would result in approximately 183 additional residents, representing approximately 17 percent of the anticipated population growth in the city by 2025.

As shown in Table 3-20, above, ABAG estimates that the number of households in the city will grow by approximately 435 between 2020 and 2025. The Project would generate a demand for 74 housing units in the city. Therefore, the Project-induced housing demand would equate to 17 percent of the projected housing demand by 2025. In 2020, the City entitled the construction of 818 net new units, along with "in progress" applications for approximately 180 new units.[118] New residents induced by the jobs at the Project site could be accommodated within this new construction. With the housing development projects throughout the city, additional housing would not be needed. Therefore, the Project would not directly result in substantial population growth beyond what is expected for the city.

The Project would be an infill development within an already-developed area of the city. The Project site is well served by urban infrastructure, services, and transit. As described in Section XIX*, Utilities and Service Systems*, the utilities that currently serve the Project site are adequate under existing conditions and would be able to continue serving the site during Project operations. Furthermore, no infrastructure is proposed as part of the Project that would serve offsite areas. Therefore, the utility connections that would be required for the Project would not contribute to unplanned indirect population growth in offsite areas. The Project would not induce a substantial level of unplanned population growth in the city, either directly or indirectly. Impacts would be ***less than significant***.

b. Displace a substantial number of existing people or housing, necessitating the construction of replacement housing elsewhere? (No Impact)

The Project does not include demolition of any structures; the new building would be constructed within an existing surface parking lot. Therefore, because the Project site is currently unoccupied, the Project would not displace people or housing and would not necessitate the construction of replacement housing elsewhere. The Project would result in ***no impact***.

[117] The 880 net new Project employees/1.42 workers per worker household × 12 percent of Burlingame employees who also live in the city = approximately 74 employees who would live in the city.

[118] City of Burlingame. 2021. *Staff Report: Housing Element Annual Progress Report (APR) on Implementation of the Housing Element of the General Plan.* March 1. Available: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/Burlingame_HE_APR_2020.pdf. Accessed: June 8, 2021.

XV. Public Services

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or a need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the following public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☒	☐
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☒	☐

Setting

Fire Protection

The Central County Fire Department (CCFD) provides fire protection services within Burlingame, Millbrae, and Hillsborough. In total, the CCFD service area covers almost 15 square miles, with a residential population of approximately 61,344. The CCFD has 88 full-time employees, including 79 uniformed personnel.[119] There are six fire stations in the CCFD's jurisdiction, two of which are in Burlingame. The closest CCFD station to the Project site is Fire Station No. 34 at 799 California Drive in Burlingame, approximately 0.8 mile southwest of the Project site.[120] The CCFD's goal is to keep response times under 7 minutes. The current response time for the CCFD is approximately 4 minutes, 30 seconds for 98 percent of emergency calls.[121]

Police Protection

The Burlingame Police Department (BPD) provides emergency police services within a 5-square-mile area with approximately 30,000 residents. The BPD has one police station, located at 1111 Trousdale Drive. The BPD employs 69 men and women, including 40 full-time sworn officers, resulting in a ratio of 1.30 officers

[119] Central County Fire Department. 2020. *Fiscal Year 2020–2021 Adopted Budget*. Available: https://ccfd.org/wp-content/uploads/2020/07/CCFD-Adopted-Budget-FY20-21.pdf. Accessed: January 21, 2021.

[120] Ibid.

[121] Ambruster, Kristin. Human resources manager, Central County Fire Department. May 21, 2020—phone conversation with Caroline Vurlumis, ICF, San Francisco, CA.

per 1,000 residents.[122] The Burlingame General Plan Community Safety Element does not designate a standard ratio for police officers to residents or a standard emergency response time. However, the Burlingame General Plan does require continued maintenance of optimal police staffing levels to meet community safety needs.[123] The current emergency response time is 4 minutes, 37 seconds.[124]

Schools

The Burlingame School District (BSD) is responsible for six elementary schools and one intermediate school.[125] Total student enrollment was 3,534 in the 2019–2020 school year.[126] In addition, Burlingame High School, part of the San Mateo Union High School District (SMUHSD), is located in Burlingame.[127] In total, the SMUHSD serves approximately 9,000 students.[128]

The Project site is within the service area for Washington Elementary School. It is also within the service area for Burlingame Intermediate School and Burlingame High School.[129] Table 3-22 provides enrollment information for the three schools from the 2019–2020 school year, the most recent data available.

Table 3-22. Public Schools Serving the Project Area

School	2019–2020 School Year Enrollment
Washington Elementary School	375
Burlingame Intermediate School	1,113
Burlingame High School	1,528

Source: California Department of Education, 2020.

Parks

Please see Section XVI, *Recreation*, for a discussion about parks and recreational facilities in Burlingame.

Other Public Facilities

The Burlingame Main Public Library, at 480 Primrose Road, is the closest public library to the Project site. The Burlingame Public Library is part of the Peninsula Library System, which serves the eastern portions of San Mateo County, from South San Francisco to Menlo Park. The Burlingame Public Library serves Burlingame and Hillsborough residents as well as any resident within the library system.

[122] City of Burlingame Police Department. 2018. *About Us*. Available: https://www.burlingame.org/departments/police_department/about_us.php. Accessed: January 21, 2021.

[123] Ibid.

[124] Boll, Robert. Captain, Burlingame Police Department. May 21, 2020—voicemail left for Caroline Vurlumis, ICF, San Francisco, CA.

[125] Burlingame School District. 2018. *Burlingame School District, District Boundaries*. Available: https://www.bsd.k12.ca.us/districtboundaries1617. Accessed: January 21, 2021.

[126] Education Data Partnership. 2020. *Burlingame Elementary*. Available: http://www.ed-data.org/district/San-Mateo/Burlingame-Elementary. Accessed: January 21, 2021.

[127] Burlingame High School. 2020. *Burlingame High School, Mission, Vision, and Values*. Available: https://www.smuhsd.org/domain/826. Accessed: January 21, 2021.

[128] San Mateo Union High School District. 2021. *Welcome to the San Mateo Union High School District!* Available: https://www.smuhsd.org/domain/46. Accessed: January 21, 2021.

[129] Burlingame School District. 2018. *Burlingame School District, District Boundaries*. Available: https://www.bsd.k12.ca.us/districtboundaries1617. Accessed: January 21, 2021.

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to public services. No mitigation measures or standard conditions of approval were warranted. The following Burlingame General Plan goals and policies from the Community Safety Element, the Education and Enrichment Element, and the Healthy People and Healthy Places Element would help to reduce the less-than-significant impacts: Goal CS-1, Policy CS-1.1, Policy CS-1.2, and Policy CS-1.3; Goal CS-2, Policy CS-2.1 and Policy CS-2.3; Policy EE-1.3, Policy EE-1.4, Policy EE 1.10, and Policy EE-1.13; Goal HP-4, Policy HP-4.1, Policy HP-4.4, Policy HP-4.6, and Policy HP-4.8.

Discussion

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

Fire protection? (Less than Significant)

The Project would construct a new building with office uses on a vacant portion of the Project site, which is already developed and served by the CCFD. The Project would add up to 880 new employees at the Project site and induce up to 183 individuals to move to the city. The Project would be required to comply with all applicable CCFD codes and regulations and meet CCFD standards related to fire hydrants (e.g., fire-flow requirements, hydrant spacing), the design of driveway turnaround areas, and access points, among other standards. In addition, the Project would be approximately 0.8 mile southwest of Fire Station No. 34. Because of the distance of the Project from the fire station, it is not expected that Project operations would substantially affect response times.

Under CEQA, the need for additional equipment and/or personnel to support fire services is not considered a significant impact, unless new facilities are needed, the construction of which could result in physical impacts. The increase in the number of employees and residents at the Project site would be considered minimal compared with the population in the rest of the city. Therefore, the Project would not increase the need for fire services, staffing, and/or equipment to the extent that new fire facilities would need to be constructed, resulting in a ***less-than-significant*** impact.

Police protection? (Less than Significant)

The Project site is currently served by the BPD. The Burlingame General Plan Community Safety Element does not designate a standard ratio for police officers to residents or a standard emergency response time. However, the Burlingame General Plan does require continued maintenance of optimal police staffing levels to meet community safety needs.[130] The Burlingame General Plan EIR referenced the "238 Bypass Fiscal Impact Analysis" metric, which established an optimum ratio of 1.5 sworn police officers per 1,000 residents.[131]

[130] City of Burlingame. 2019. *Envision Burlingame General Plan*. Available: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/General%20and%20Specific%20Plans/BurlingameGP_Final_Nov2019_COMPLETE%20DOCUMENT.pdf. Accessed: January 21, 2021.

[131] City of Burlingame. 2018. *Burlingame 2014 General Plan: Draft Environmental Impact Report.* Available: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/BurlingameGP_DEIR_FullDocument_06-28-2018.pdf. Accessed: January 21, 2021.

The Project would add approximately 880 employees at the site compared with existing conditions and induce 183 new residents to relocate to the city. The Burlingame General Plan EIR, adopted in 2018, found that the BPD has not identified a need for new or expanded facilities to meet service needs.[132] In addition, the estimated service ratio of sworn officers to residents is currently 1.3 sworn officers to 1,000 residents.[133,134] The addition of 183 residents to the population would not substantially decrease this optimum service ratio.[135]

Under CEQA, the need for additional equipment and/or personnel to support police services is not considered a significant impact, unless new facilities are needed, the construction of which could result in physical impacts. The increase in the number of employees and residents at the Project site would be considered minimal compared with the population in the rest of the city. Therefore, the Project would not increase the need for police services or staffing to the extent that new police facilities would need to be constructed, resulting in a ***less-than-significant*** impact.

Schools? (Less than Significant)

As discussed in more detail in Section XIV*, Population and Housing*, the Project would induce up to 183 individuals to move to Burlingame. The BSD uses a student generation rate of 0.2067 student per housing unit for elementary schools and a generation rate of 0.0525 for middle schools.[136] For high schools, the state high school student generation rate is 0.2 student per housing unit.[137] Using these student generation rates, 74 additional residences in the city could result in up to 16 elementary school students, four middle school students, and 15 high school students, which is not anticipated to result in a significant impact on the BSD or the SMUHSD.

The Project is subject to Senate Bill 50 school impact fees, as established by the Leroy F. Greene School Facilities Act of 1998. These fees support facility maintenance to offset potential impacts from additional use.[138] Section 65996 of the State Government Code notes that payment of the school impact fees established by Senate Bill 50, which may be required by any state or local agency, is deemed to constitute full and complete mitigation for school impacts from development. Therefore, the impacts would be ***less than significant***.

Parks? (Less than Significant)

The closest public parks to the Project site are Robert E. Woolley State Park and Bayside Park, which are 0.25 mile northwest and 1 mile west of the Project site, respectively. As explained in more detail in Section XVI, *Recreation*, a significant increase in the use of public parks, recreational facilities, or other public facilities is not anticipated after Project buildout. Furthermore, substantial adverse

[132] Ibid.

[133] The population of Burlingame in January 2020 was estimated to be 30,320 (see Section XIV*, Population and Housing*). The number of sworn officers is 40.

[134] 1.3 sworn officers per 1,000 residents = (40 sworn officers/30,320 [population]) × 1,000 residents.

[135] 1.3 sworn officers per 1,000 residents = (40 sworn officers/30,320 [population]) + 183 (Project-induced population) × 1,000 residents.

[136] SchoolWorks, Inc. 2016. *Level 1 – Developer Fee Justification Study for Burlingame School District*. Available: http://bsd-ca.schoolloop.com/file/1236520987086/1403330967436/5172072493375788958.pdf. Accessed: January 21, 2021.

[137] State Allocation Board, Office of Public School Instruction. 2008. *Enrollment Certification/Projection*. Available: https://www.dgsapps.dgs.ca.gov/OPSC/ab1014/sab50-01instructions.pdf. Accessed: January 21, 2021.

[138] State of California. 1998. *School Facilities Bond Act*. Available: http://www.leginfo.ca.gov/pub/97-98/bill/sen/sb_0001-0050/sb_50_bill_19980827_chaptered.pdf. Accessed: January 21, 2021.

physical impacts that would require the provision of new or physically altered park facilities after Project buildout would not occur. Because the Project would not trigger the need for new or modified park facilities, the impacts would be ***less than significant***.

Other public facilities? (Less than Significant)

The Project would induce up to 183 individuals to move to the city and add approximately 880 employees at the Project site. The Burlingame Main Public Library is the closest library to the Project site; however, it is expected that Project employees and Project-induced Burlingame residents would also use the Burlingame Public Library's Easton Branch Library as well as other libraries within the Peninsula Library System. The library system is expected to be able to accommodate the increase in the number of library users without any need for physical expansion of its facilities. Because the Project would not trigger the need for new library facilities, the impacts would be ***less than significant***.

XVI. Recreation

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b.	Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

Setting

The City of Burlingame Parks and Recreation Department manages 18 recreational facilities citywide, including playgrounds, picnic areas, gardens, athletic facilities, walking trails, and more. The two parks closest to the Project site are Robert E. Woolley State Park and Bayside Park, which are 0.25 mile northwest and 1 mile west of the Project site, respectively. Several additional parks are located south of Burlingame Lagoon, such as Trenton Park and Victoria Park.

The Burlingame General Plan and Chapter 25.33 of the Burlingame Municipal Code do not specifically provide open space requirements for AA-zoned areas. However, the Burlingame General Plan does acknowledge the importance of providing high-quality streetscapes and open spaces to expand and improve the Bayfront area.

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to recreation. No mitigation measures or standard conditions of approval were warranted. The following Burlingame General Plan goals and policies from the Healthy People and Healthy Places Element would help reduce the less-than-significant impacts: Goal HP-4, Policy HP-4.1, Policy HP-4.4, Policy HP-4.6, and Policy HP-4.8.

Discussion

a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated? (Less than Significant)

As described in Section XIV, *Population and Housing,* the Project is expected to generate up to 880 new employees. It is expected that some of these onsite employees would use park and recreational facilities near the Project site. However, in accordance with the Burlingame General Plan, the Project would include outdoor space. The Project site would provide outdoor space at the southern exposure adjacent to the new office/R&D building. The open space would include an overlook with views of Burlingame Lagoon and the Santa Cruz Mountains and provide a variety of seating areas, dining opportunities, and lawn games. Existing open spaces at the Project site would be retained

under the Project. The Project would maintain public access to the BCDC Shoreline Band during and after construction, including the Bay Trail and 15 dedicated parking spaces. The Bay Trail, vegetation, and amenities within the BCDC Shoreline Band would not be altered.

With the onsite open spaces and nearby Robert E Woolley State Park and Bayside Park, the potential for park facility deterioration resulting from the increased population at the Project site would be reduced. Therefore, impacts would be ***less than significant***.

b. Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment? (Less than Significant)

As mentioned above, the Project would provide onsite open space (e.g., an overlook with views of Burlingame Lagoon and the Santa Cruz Mountains and a variety of seating areas, dining opportunities, and lawn games). The open space areas would serve as recreational areas for many current and future employees at the Project site. Construction of these new open spaces has been accounted for as part of overall site construction. Furthermore, although the Project would add employees to the area, the Project would not trigger the need for construction or expansion of parks or other recreational facilities. Therefore, the Project would have a ***less-than-significant*** impact related to an adverse physical effect on the environment due to the construction or expansion of recreational facilities.

XVII. Transportation

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b.	Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c.	Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d.	Result in inadequate emergency access?	☐	☐	☒	☐

Setting

A transportation impact analysis (TIA) was prepared for the Project by TJKM in March 2021 (see Appendix E).[139] The TIA describes existing and future conditions related to transportation with and without the Project. In addition, the TIA includes information on regional and local roadway networks, pedestrian and transit conditions, and transportation facilities associated with the Project.

Regional vehicular access to the Project site is provided by US 101 and El Camino Real (State Route 82), while local access is provided by Airport Boulevard, Anza Boulevard, Old Bayshore Highway, Broadway, California Drive, Rollins Road, Carolan Avenue, Peninsula Avenue/Coyote Point Drive, and North Bayshore Boulevard. Pedestrian facilities in the area consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. In the vicinity of the Project site, most of the intersections that are signalized are equipped with countdown pedestrian signal heads and crosswalks. Only the intersection at Old Bayshore Highway and US 101 northbound does not have pedestrian signal heads or crosswalks. In addition, crosswalks are not present at either of the unsignalized intersections at the Project site driveways.

The overall network of sidewalks and crosswalks has adequate connectivity, providing pedestrians with safe routes to transit services and points of interest in the vicinity of the Project site. There are also several off-street Class I paths in the area of Airport Boulevard, most of which provide access to the Bay shoreline. There is also a Class I pedestrian bridge over US 101 at Broadway.

The Bay Trail is a Class I multi-use trail that passes east and south of the Project site, approximately parallel to Sanchez Channel and Burlingame Lagoon. A small number of parking spaces at the Project site (15) are provided for trail users; direct access is provided along the eastern and southern boundaries of the Project site. A Class I shared-use path is located north of the Project site, along the Bay shoreline and Anza Lagoon. Class I paths east of Airport Boulevard continue into San Mateo where they

[139] TJKM. 2021. *Burlingame Bay Office Building at 567 Airport Boulevard Transportation Impact Analysis Report*. March 19.

connect to the Coyote Point Recreation Area. Additional Class I connections are proposed in the Project area in the City Bicycle and Pedestrian Master Plan to connect existing trails and provide more shoreline access. Class II bicycle lanes are provided on portions of Airport Boulevard, California Drive, Rollins Road, Carolan Avenue, Howard Avenue, and Peninsula Avenue.[140] On California Drive and Carolan Avenue, the Class II bicycle facilities have been enhanced with high-visibility green paint to create a buffered bicycle lane.

Existing transit service to the Project area is provided by SamTrans, Caltrain, the Burlingame Trolley, and the Burlingame Bayside Shuttle. In the immediate vicinity, SamTrans Routes ECR, 46, 292, 397, and 398 provide service to the Project site and vicinity. The closest SamTrans bus stop, served by Route 292, is 500 feet west of the Bayshore Highway and Airport Boulevard/Broadway intersection.

Caltrain provides passenger train service between San José and San Francisco 7 days a week. During commute hours, Caltrain provides extended service to Morgan Hill and Gilroy. The closest Caltrain stations to the Project site are the Broadway station (located at Broadway and California Drive) and the Burlingame station (located at Burlingame Avenue and California Drive). However, as of spring 2021, the Broadway station has only weekend service between the hours of 8:00 a.m. and 11:00 p.m., operating at 60-minute intervals. The Burlingame station provides local and limited Caltrain service both weekdays and weekends. Trains that stop at the Burlingame station operate with approximately 15- to 45-minute headways in both directions during commute hours, with somewhat less frequent service during midday hours. Service is provided between 5:30 a.m. and 11:35 p.m. in the northbound direction and between 5:20 a.m. and 12:35 a.m. (the next day) in the southbound direction.[141] As part of a modernization program, Caltrain rail service will be electrified. The electrified system will allow Caltrain to increase its service. Furthermore, improved system operations will help Caltrain accommodate an increase in ridership.

The Burlingame Trolley is a free service provided by the City, the Broadway Business Improvement District, the Downtown Burlingame Improvement District, and several hotels in the area. It currently operates between 11:50 a.m. and 9:44 p.m. seven days a week, circulating between downtown Burlingame, the Broadway Business District, Burlingame Caltrain, and several hotels along Airport Boulevard. Currently, the closest stop to the Project area is at the Hilton Hotel, directly across the street from the Project site.

The Burlingame Bayside Shuttle is a commuter shuttle operated by the San Mateo County Transportation Demand Management Agency, also known as Commute.org. The shuttle operates during the peak commute hours of 7:00 a.m. to 9:45 a.m. and 3:52 p.m. to 6:53 p.m., with connections for commuters between the Millbrae BART/Caltrain station and office parks and hotels along Rollins Road, Adrian Road, Bayshore Highway, and Airport Boulevard. The closest stop to the Project site is directly adjacent to the site at the corner of Airport Boulevard and Bay View Place.

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to transportation with implementation of governing rules, regulations, and mitigation measures. The Burlingame General Plan EIR found that Burlingame General Plan goals, policies, and implementation programs would limit most of transportation and circulation impacts to a less-than-significant level or result in no impact. The

[140] City of Burlingame. 2020. *City of Burlingame Bicycle and Pedestrian Master Plan*. Adopted: December 2020. Available: https://www.burlingame.org/business_detail_T54_R154.php. Accessed: April 8, 2021.

[141] These services were available during the COVID-19 pandemic, effective June 15, 2020.

following goals and policies from the Mobility Element would reduce impacts related to transportation: Goal M-1, Policy M-1.1 and Policy M-3.1; Goal M-4, Policy M-4.1; Goal M-5, Policy M-5.1; and Policy M-9.2. In most cases, no one goal, policy, or implementation measure is expected to completely avoid or reduce an identified potential environmental impact. However, the cumulative mitigating benefits of the policies listed above would result in a less-than-significant impact.

Discussion

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities? (Less than Significant)

The TIA conducted for the Project evaluated impacts in accordance with standards set forth by the City as well as the C/CAG of San Mateo County Congestion Management Program (CMP). The study included an analysis of weekday AM and PM Peak-Hour traffic conditions at 12 intersections in the vicinity of the Project site. Potential impacts on bicyclists, pedestrians, and transit services were also considered.

Construction

Heavy equipment would be transported on and off the Project site during demolition and construction. The transport of heavy equipment could cause slight traffic delays in the vicinity of the Project site during construction; however, the delays would be temporary. The impact regarding conflicts with applicable plans during construction would be ***less than significant***.

Operation

Based on trip generation rates recommended by the Institute of Transportation Engineers, it is estimated that the Project would generate 2,338 net new daily vehicle trips, with 278 net new trips during the AM Peak Hour and 276 net new trips during the PM Peak Hour.[142] Because the Project is not replacing any existing uses, existing driveway counts had to be estimated to establish the number of peak-hour trips generated by existing uses. The counts were generated from Institute of Transportation Engineers trip generation rates and based on the occupancy rates at the existing buildings provided by the property managers.

The C/CAG of San Mateo County CMP requires a level-of-service (LOS) analysis for a freeway segment when the number of trips added by a project is expected to be greater than 1 percent of the segment's capacity. The number of new trips generated by the Project is expected to be less than the 1 percent threshold for freeway segments. Therefore, a detailed freeway-segment analysis was not performed. However, the CMP requires developments that are estimated to generate 100 or more new peak-hour trips to implement TDM measures (e.g., provide trip credits equal to or greater than a project's net peak-hour trip generation). As stated above, the Project would generate 278 net new trips during the AM Peak Hour and 276 net new trips during the PM Peak Hour. Therefore, because the Project would generate more than 100 new peak-hour trips, TDM measures have been identified to reduce the number of peak-hour trips. Goal M-5 of the Burlingame General Plan also requires implementation of TDM strategies to reduce the overall number of vehicle trips and encourage the use of transportation modes that reduce VMT and GHG emissions. As described in Chapter 2, *Project Description*, the goal of the Project Sponsor's TDM plan is to reduce single-occupancy vehicle VMT to

[142] TJKM. 2021. *Burlingame Bay Office Building at 567 Airport Boulevard Transportation Impact Analysis Report*. March 19, 2021. From the Institute of Transportation Engineers *Trip Generation Manual*, 10th edition, 2017.

and from the Project site by 20 percent compared with an equivalent project constructed elsewhere and with different design and programming incentives. Regular monitoring and reporting would ensure tenant compliance with C/CAG of San Mateo County standards for trip reductions. Therefore, the Project would be consistent with the CMP and the Burlingame General Plan. The impact associated with conflicts with local plans would be ***less than significant***.

An impact on transit would occur if the Project were to change existing transit services or routes reflected in existing policy documents. As discussed above, the Project site is adequately served by transit service and would continue to be served upon Project implementation. In addition, shuttle and transit stops are provided at several locations along Airport Boulevard, including across the street from the Project site.

The Project is expected to produce higher-than-normal transit demand; therefore, an onsite TDM plan would be implemented. However, because existing transit services are spread out over multiple bus routes, they can accommodate the proposed demand. Therefore, transit access to the Project site is considered adequate, and impacts on the nearby transit network would be ***less than significant***.

The City's Bicycle and Pedestrian Master Plan aims to improve the safety, health, and quality of life of Burlingame residents through transportation infrastructure, program, and policy improvements that enhance the safety, comfort, and attractiveness of bicycling and walking for people of all ages and abilities.[143] An impact on bicyclists would occur if the Project were to disrupt existing bicycle facilities or conflict with adopted bicycle system plans, guidelines, and policies or create inconsistencies. Bicycle access to the Project site would continue to be provided by the existing Class II bicycle lanes along Airport Boulevard. In addition, the Project site would continue to be served by the Class I Bay Trail. The Bay Trail, vegetation, and amenities within the BCDC Shoreline Band on the Project site would not be altered as part of the Project. Therefore, the Project would not result in any conflicts with the City's Bicycle and Pedestrian Master Plan. Bicycle access to the Project site is considered adequate, and impacts on nearby bicycle facilities would be ***less than significant***.

Pedestrian access would be facilitated by internal sidewalks that would connect to existing sidewalks on Airport Boulevard and the Bay Trail Class I path that runs along the southern and eastern boundaries of the Project site. There are crosswalks at most major intersections near the Project site, with pedestrian signal heads at signalized intersections. Existing pedestrian facilities provide continuous paths to nearby locations, such as Broadway Caltrain, the Broadway Business district, hotels, and recreational areas.

A significant impact would occur if the Project were to conflict with applicable or adopted policies, plans, or programs related to pedestrians facilities. The Project would not alter existing pedestrian facilities and would not conflict with the City's *Bicycle and Pedestrian Master Plan*. Pedestrian access to the Project site is considered adequate, and impacts on nearby pedestrian facilities would be ***less than significant***.

[143] City of Burlingame. 2020. *City of Burlingame Bicycle and Pedestrian Master Plan*. Adopted: December 2020. Available: https://www.burlingame.org/business_detail_T54_R154.php. Accessed: April 8, 2021.

b. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)? (Less than Significant)

The TIA prepared for the Project (Appendix E) includes a qualitative and quantitative analysis of VMT generated by the Project. The qualitative analysis discusses the general characteristics of daily VMT generated by the proposed land use and how the VMT characteristics of the Project site would change with the Project.

SB 743 is intended to encourage the development of communities that reduce vehicular GHG through land use patterns that site residences near employment and commercial areas that residents visit frequently. Because VMT associated with freight/delivery trips is not relevant to this purpose, such trips were not included in the VMT analysis. Furthermore, because the City does not have adopted VMT standards or guidelines, the TIA uses guidelines and recommendations provided in the Office of Planning and Research Technical Advisory, as follows:

> A proposed project exceeding a level of 15 percent below existing regional VMT per employee may indicate a significant transportation impact.

For office projects, the Office of Planning and Research Technical Advisory recommends that lead agencies analyze the home-based commute VMT per employee that would be generated at a project site. The advisory provides several recommended screening criteria lead agencies may consider in determining whether detailed VMT analysis is required. When such analysis is required, projects that are similar to existing nearby uses can be evaluated, based on existing VMT at the project location. Existing VMT may be determined through use of a travel demand model. The C/CAG of San Mateo County licenses the countywide travel demand model for San Mateo County from the Santa Clara County Valley Transportation Authority (VTA). The C/CAG-VTA model is optimized for use in Santa Clara and San Mateo Counties.

In the Project vicinity, the C/CAG-VTA travel demand model generated a daily commute VMT per employee of 17.92 for the baseline model year of 2015. This is more than 15 percent below the countywide average of 29.50 and a corresponding threshold of 25.07. Based on the recommended screening criteria used for this study, this is considered a low-VMT area. The Project would be consistent with existing land uses, which include other large office buildings. The Project would therefore be expected to result in a less-than-significant impact under CEQA. It is exempt from further VMT analysis.

c. Substantially increase hazards because of a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? (Less than Significant)

Because the Project would include a new office building on a site with similar uses, implementation of the Project would not result in incompatible uses. In addition, the Project would not include the construction of new or modified public roadways; therefore, hazards due to new design features would not occur.

Primary access to the Project site would be provided by two existing driveways that currently provide access from Airport Boulevard to the existing 555 and 577 Airport Boulevard office buildings. Access to the proposed parking structure would be provided within the interior of the Project site and not on city streets.

Sight distance for vehicles exiting the driveway at the Project site was evaluated in the TIA. Based on the prevailing speed of 35 mph, there is adequate sight distance at the western driveway with respect to both eastbound and westbound conflicting traffic. At the eastern driveway, the sight

distance is adequate for westbound conflicting traffic. The available sight distance with respect to eastbound conflicting traffic is marginal and may be obstructed by two trees directly adjacent to the driveway. However, it should be noted that the Project driveway would be the same as the existing eastern driveway, which is used to access the existing office buildings on the site. Accordingly, the Project would not change existing sight distance conditions. Vehicle access to the Project site is considered adequate. Therefore, the design features of the Project would not include hazardous designs or incompatible uses, and the impact would be ***less than significant***.

d. Result in inadequate emergency access? (Less than Significant)

The Project site would be accessed from two existing driveways west and north of the proposed office building. These driveways would be used to access the existing buildings at 555 and 577 Airport Boulevard, the proposed building at 567 Airport Boulevard, and the proposed parking structure. The interior circulation roads would include surface parking as well. The driveways and interior circulation roads would be 26 feet wide, with sections as wide as 29 feet, not including surface parking spaces. There is adequate for vehicles to maneuver into and out of parking spaces and garages. The Project design would also provide adequate space for trucks and emergency vehicles to access the site and maneuver as needed, including an adequate turning radii for truck access. Onsite circulation is considered adequate, and impacts would be ***less than significant***.

XVIII. Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Setting

To identify tribal cultural resources within the Project area, the Native American Heritage Commission (NAHC) was contacted on January 27, 2021, and asked to provide a list of California Native American tribes that are geographically affiliated with the Project site. A search of the NAHC's SLF was also requested. On February 8, 2021, the NAHC responded with a list of eight individuals for consultation; the search of the SLF was negative. Letters with Project details, a location map, and a request for consultation were sent on February 23, 2021, to the following individuals:

- Tony Cerda, Chairperson – Costanoan Rumsen Carmel Tribe
- Charlene Nijmeh, Chairperson – Muwekma Ohlone Tribe of the San Francisco Bay Area
- Monica Arellano – Muwekma Ohlone Tribe of the San Francisco Bay Area
- Andrew Galvan – The Ohlone Indian Tribe
- Kanyon Sayers-Roods, Most Likely Descendant Contact – Indian Canyon Mutsun Band of Costanoan Ohlone People
- Ann Marie Sayers, Chairperson – Indian Canyon Mutsun Band of Costanoan Ohlone People
- Irenne Zwierlein, Chairperson – Amah Mutsun Tribal Band of Mission San Juan Bautista
- Dee Dee Ybarra, Chairperson – Rumšen Am:a Tur:ataj Ohlone

Follow-up phone calls were made on April 7, 2021. Kanyon Sayers-Roods, chairperson of the Indian Canyon Mutsun Band of Costanoan Ohlone People, requested that there be both a Native American monitor and an archaeological monitor when excavations take place and that cultural sensitivity training be offered at the beginning of the Project. Irenne Zwierlein asked that cultural sensitivity training be offered at the beginning of the Project and that an archaeologist and Native American monitor be called to the site if any Native American archaeological finds are discovered. Dee Dee Ybarra asked that cultural sensitivity training be offered at the beginning of the Project.

To date, no Native American resources have been identified within the Project site. Consultation is ongoing, and consultation records will be updated as necessary. In addition, the records search conducted at the Northwest Information Center did not identify any cultural resources within the Project area. Documentation of tribal consultation is included in Appendix D.

Burlingame General Plan EIR

Tribal consultation was conducted for the Burlingame General Plan EIR during the Notice of Preparation (NOP) process; no tribes responded to the NOP. The Burlingame General Plan EIR concluded that no one goal, policy, or implementation measure would be expected to completely avoid or reduce an identified potential impact on tribal resources. However, compliance with existing regulations and policies would reduce impacts to less than significant.

Discussion

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe and that is:

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

A search of the SLF identified no tribal cultural resources in the Project area, and no tribal cultural resources or burials were identified as a result of consultation with the Native American groups the NAHC listed as geographically affiliated with the region. Moreover, as noted in Section IX, *Hazards and Hazardous Materials*, the Project site is located on artificial fill created in the 1960s and 1970s. Notwithstanding, the potential exists for previously undiscovered tribal cultural resources to be encountered during Project-related ground disturbance. Buried deposits may be eligible for listing in the California Register of Historical Resources. If such resources were to be destroyed by Project-related activities, the impact would be significant.

Mitigations measures included in Section V, *Cultural Resources*, would reduce impacts. Implementation of Mitigation Measure CUL-1 would require the excavation crew to receive pre-construction archaeological sensitivity training, which would define what archaeological resources are and lay out the protocol for unanticipated archaeological discoveries, as outlined in Mitigation Measure CUL-2. The protocol requires construction work to stop if an archaeological material or feature is encountered during ground-disturbing activities, thereby preventing further disruption and possible damage. The resource would be properly evaluated, and a treatment plan would be developed with Native American stakeholders. Mitigation Measure CUL-3 would require construction work to stop if human remains are encountered during ground-disturbing activities

and proper procedures regarding notification to be followed, per Section 50977.98 of the Public Resources Code and Section 7050.5 of the State Health and Safety Code. Implementation of Mitigation Measures CUL-1 and CUL-3 would ensure that any previously undiscovered tribal cultural resources would be properly treated if found during construction. Therefore, this impact on tribal cultural resources would be ***less than significant after mitigation***.

b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? (Less than Significant with Mitigation Incorporated.)

As stated previously, no sacred lands were identified by the NAHC in the vicinity of the Project site, and no previously recorded archaeological resources within the Project site or within 0.5 mile of the Project site were identified during the records search at the Northwest Information Center. In addition, no tribal cultural resources were identified during consultation with California Native American tribes. However, the potential still exists for encountering as-yet undocumented archaeological resources because of the archaeological and historical contexts of the Project site, combined with the presence of Holocene-age soils. Prehistoric archaeological resources could be considered tribal cultural resources. Therefore, the impact on tribal cultural resources would be potentially significant.

As described previously, implementation of Mitigation Measures CUL-1 and CUL-3 would mitigate potential impacts on as-yet undocumented resources and human burials. Therefore, the impact on such resources, which could be considered significant by California Native American tribes (per Public Resources Code Section 5024.1), would be ***less than significant after mitigation***.

XIX. Utilities and Service Systems

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
Would the project:					
a.	Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b.	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c.	Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d.	Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e.	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Setting

Water

The City purchases all of its potable water from the San Francisco Public Utilities Commission (SFPUC) Regional Water System (RWS). Approximately 85 percent of the SFPUC RWS water supply originates in the Hetch Hetchy watershed in Yosemite National Park, then flows down the Tuolumne River to Hetch Hetchy Reservoir.[144] The remaining 15 percent of the SFPUC RWS water supply originates locally in the Alameda and Peninsula watersheds. This water is stored in six different reservoirs in Alameda and San Mateo Counties.[145] According to the City's 2015 Urban Water Management Plan (UWMP), Burlingame's average water demand between 2011 and 2015 totaled 1,458 million gallons, which is equivalent to 3.99 million gallons per day (mgd),[146] or 76 percent of Burlingame's allotted 5.23 mgd.

[144] Erler & Kalinowski, Inc. 2016. *2015 Urban Water Management Plan for the City of Burlingame*. Available: https://www.burlingame.org/document_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf. Accessed: January 27, 2021.

[145] Ibid.

[146] Ibid.

Generally, 41 percent of water consumption is from single-family residential uses, 17 percent from multi-family residential uses, 13 percent from industrial uses, 12 percent from commercial uses, 5 percent from irrigation uses, and 5 percent from institutional uses.[147,148]

A 12-inch municipal water main is located south of the Project site, along Burlingame Lagoon.

Wastewater

The City's Public Works Department services Burlingame's wastewater system. A 10-inch municipal sewer connection is located in Airport Boulevard adjacent to the Project site. In addition, a private 8-inch sewer that serves existing uses drains to a connection near the driveway on the west.[149] The existing buildings on the Project site have 259,733 sf of commercial office space, which is estimated to generate approximately 25,973 gallons per day (gpd) (0.0259 mgd) of wastewater.[150] Assuming a peaking factor[151] of 2.0, the existing peak demand from existing buildings on the Project site is 36.08 gallons per minute.

Wastewater flows are carried to a wastewater treatment plant (WWTP) at 1103 Airport Boulevard, which serves the entire city as well as approximately one-third of Hillsborough. The average dry-weather flow of wastewater to the WWTP has remained fairly constant, at approximately 3.0 to 3.5 mgd, which is approximately 55 to 64 percent of the facility's 5.5 mgd capacity.[152]

Stormwater

Under existing conditions, stormwater from the Project site drains to a pump station on the south side of the Project site and outfalls to Burlingame Lagoon,[153] which eventually drains into the Bay. Therefore, it is subject to the requirements of the Clean Water Act of 1972, which prohibits the discharge of stormwater into waters of the United States, unless the discharge is in compliance with an NPDES permit, as described in detail in Section X, *Hydrology and Water Quality*.

Solid Waste

Burlingame is within the service area of RethinkWaste, also known as the South Bayside Waste Management Authority. The City as well as the Towns of Atherton and Hillsborough; Cities of Belmont, East Palo Alto, Foster City, Menlo Park, Redwood City, San Carlos, and San Mateo; the County of San Mateo; and the West Bay Sanitary District form the Joint Powers Authority (JPA) for RethinkWaste. Recology San Mateo County provides recycling, composting, and garbage collection services for residents and businesses in the RethinkWaste service area. Recyclables and organic solid

147 Ibid.

148 The City adopted its UWMP in June 2016. Pursuant to the Urban Water Management Planning Act (California Water Code Section 10610 et seq.), UWMPs are normally updated every 5 years, typically in years ending in a 5 or a 0. However, in 2015, state law extended the deadline by a year. Accordingly, the City's June 2016 UWMP is up for review in 2021. As of the date of this document, the City has not yet drafted or adopted a 2021 update to its UWMP. The City's 2015 UWMP provides the most reasonable basis for use in this analysis.

149 BKF. 2020. *Burlingame Bay – Sanitary Sewer Demand Memorandum*. April 3.

150 Ibid.

151 The peaking factor is the ratio of the maximum flow to the average daily flow in a water or wastewater system.

152 Erler & Kalinowski, Inc. 2016. *2015 Urban Water Management Plan for the City of Burlingame*. Available: https://www.burlingame.org/document_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf. Accessed: January 27, 2021.

153 BKF. 2020. *Burlingame Bay – Hydrology Analysis Memorandum*. April 3.

waste are taken by Recology trucks to the Shoreway Environmental Center in San Carlos for sorting. The Shoreway Environmental Center is owned by RethinkWaste and operated by South Bay Recycling on behalf of RethinkWaste. Solid waste and recyclables received at the Shoreway Environmental Center are processed and sent to the appropriate facility, including the Corinda Los Trancos Landfill (also known as Ox Mountain Landfill), which is in Half Moon Bay. This landfill has a maximum permitted capacity of 60,500,000 cubic yards. As of December 31, 2015, its remaining capacity was 22,180,000 cubic yards. The Corinda Los Trancos Landfill has an estimated closure date of 2034 and a permitted throughput capacity of 3,598 tons per day.[154]

Electric Power, Natural Gas, and Telecommunications Facilities

Gas delivered by PG&E originates in California, the Southwest, the Rocky Mountains, and Canada. PG&E's natural gas (methane) delivery system includes 6,700 miles of transmission pipelines and 42,000 miles of distribution pipelines. The large transportation pipelines, which are under high pressure, send natural gas from gas fields and storage facilities. The smaller distribution pipelines deliver gas to individual businesses and residences. PG&E's gas pipelines serve approximately 15 million customers in California. The system is operated under an inspection-and-monitoring program in real time on a 24-hour basis. Under the program, PG&E inspects for leaks, conducts surveys, and patrols the pipelines.[155]

Numerous telecommunications providers serve Burlingame and provide access to infrastructure for broadband, fiber optic, wireless, and other emerging technologies. AT&T, Xfinity from Comcast, Wave Broadband, Sonic, and others provide telecommunication and cable television services to residents and businesses in the city. The Project site receives services from mainly AT&T and Comcast.[156]

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to utilities with implementation of mitigation measures, standard conditions of approval, and/or Burlingame General Plan goals and policies. The following goals and policies from the Infrastructure Element were identified to reduce impacts on utilities: Goal IF-2, Policy IF-2.1, Policy IF-2.3, Policy IF-2.4, Policy IF-2.7, and Policy IF-2.10; Goal IF-3, Policy IF-3.1, Policy IF-3.2, and Policy IF-3.6; and Goal IF-5, Policy IF-5.2 and Policy IF-5.8. No one established regulation, goal, policy, or implementation measure from the Burlingame General Plan would be expected to completely reduce or avoid an identified potential utilities impact. However, the combined mitigating benefits of the required regulations and policies listed in the Burlingame General Plan EIR would result in less-than-significant impacts on utilities and service system. No mitigation measures are warranted.

[154] California Department of Resources Recycling and Recovery. 2019. *Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).* Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. Accessed: January 27, 2021.

[155] Pacific Gas & Electric. 2021. *Learn about the PG&E Natural Gas System*. Available: https://www.pge.com/en_US/safety/how-the-system-works/natural-gas-system-overview/natural-gas-system-overview.page. Accessed: January 27, 2021.

[156] BroadbandNow. 2021. *Internet Service Providers in Burlingame, California.* Available: https://broadbandnow.com/California/Burlingame?zip=94010. Accessed: January 27, 2021.

Discussion

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? (Less than Significant)

Water and Wastewater Facilities

The Project site is developed with two buildings and a surface parking lot. Because the Project would be constructed within a vacant surface parking lot, operation of the Project would increase water usage and wastewater generation compared with existing conditions. Although the Project would increase sewer flows, the 10-inch sewer main in Airport Boulevard would have adequate capacity to handle the additional flows and would not require any upgrades. Existing sewers within the Project site would be rerouted as required, and new sewer services would be extended to the proposed office/R&D building and parking structure. Existing sewer connections to the 10-inch sewer main in Airport Boulevard would also be used. Similarly, new water services would connect to the existing 12-inch municipal water main located south of the Project site, along Burlingame Lagoon. Existing water services within the Project site would be rerouted as required. Therefore, the construction of new or expansion of existing waste and wastewater infrastructure would not be required.

As described in more detail under Impacts XIXb and XIXc, below, the increase in demand for water and wastewater treatment, which would be minimal, could be served by the existing water supply and the remaining capacity at the WWTP. The Project would not require the relocation or construction of new or expanded water or wastewater treatment facilities because there is adequate water and wastewater treatment capacity available to serve the Project. Therefore, the impacts would be ***less than significant***.

Stormwater

As described in Section X, *Hydrology and Water Quality*, overall, the amount of stormwater that would be discharged with implementation of the Project would be the same as under existing conditions. The Project would include a treatment pump station to direct runoff to treatment planters throughout the Project site, which would reduce stormwater runoff. In addition, the Project would be required to adhere to the MRP. No new stormwater drainage facilities, other than those included in the Project design, would be required. Because new stormwater drainage facilities would be incorporated into the design of the Project, any impacts associated with new stormwater drainage facilities for the Project would be covered in Sections I through XX of this document. Therefore, impacts associated with new stormwater drainage facilities would be ***less than significant***.

Electric Power, Natural Gas, and Telecommunications Facilities

Operation of the Project is not anticipated to result in the construction or expansion of electric power, natural gas, or telecommunications facilities. Existing electric, gas, and telecommunications lines in the vicinity of the Project site would serve the Project. However, they may be upgraded, if necessary, to meet the needs of the Project.

The installation of new or expanded gas and/or telecommunications lines on the Project site would require excavation, trenching, soil movement, and other activities that are typical during the construction of development projects. These construction impacts are discussed in detail in the appropriate topical sections of this document as part of the assessment of overall Project impacts. However, no offsite natural gas facilities or telecommunication lines would need to be installed or expanded as a result of the Project, resulting in less-than-significant impacts.

The Project would connect to existing electric and natural gas lines located around the perimeter of the Project site. No new electric power or natural gas lines would need to be installed. The Project site is served by both AT&T and Comcast for internet and other telecommunication services.[157] No new telecommunication lines would need to be installed. For the reasons outlined above, no offsite natural gas facilities would need to be constructed or expanded as a result of the Project, and telecommunication lines would not need to be installed, resulting in ***less-than-significant*** impacts.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years? (Less than Significant)

As explained above, based on its 2015 UWMP, the City uses an average of 3.99 mgd of its 5.23 mgd water supply. Burlingame's existing use represents 76 percent of its allotted supply; therefore, 24 percent of the city's water allotment is unused.[158] The Project site is estimated to currently use approximately 27,272 gpd (0.027 mgd) of potable water.[159] The Project is estimated to demand approximately 25,200 gpd (0.025 mgd) of potable water, resulting in a total proposed water demand of 52,472 gpd (0.052 mgd) for the entire Project site.[160] The additional water demand due to the Project represents an increase in daily water use in the city of approximately 0.6 percent. Burlingame's water supply can accommodate the minimal increase in water demand due to the Project. In addition, Burlingame General Plan Policies CS-2.3 and CS-2.4 would require coordination with the Fire Marshal, ensuring that the Project site would have an adequate water supply for fire suppression. Therefore, adequate water supplies would be available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years. The impact would be ***less than significant***.

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[157] BroadbandNow. 2021. *Internet Service Providers in Burlingame, California.* Available: https://broadbandnow.com/California/Burlingame?zip=94010. Accessed: January 27, 2021.

[158] As of June 2021, the City has not yet updated its UWMP. Because the City obtains its water from the SFPUC, the City is, in turn, dependent on the SFPUC's UWMP. SFPUC issued a draft UWMP in April 2021. SFPUC's draft UWMP identified several potential future water supply scenarios. Scenarios that involve full adoption of the Bay-Delta Plan indicate substantial long-term water deficits. Such deficits could reasonably be inferred to mean that SFPUC will not be able to provide its customers, including the City, with their full annual water allocations. However, SFPUC's draft UWMP also includes scenarios that indicate adequate future water supplies. SFPUC is expected to adopt a final UWMP in July 2021, at which point the City will have a more adequate basis upon which to update its own UWMP. Although it is acknowledged that SFPUC's draft UWMP indicates potential long-term water supply deficits that may inhibit its ability to provide its customers with typical allocations, as of the publication date of this document, there remains insufficient certainty regarding SFPUC's yet-to-be-finalized UWMP. Accordingly, the analysis and conclusions regarding water in this initial study rely upon the City's adopted 2015 UWMP. The analysis and conclusions in this document do not convey any water rights to the involved property. In the event that the City updates its UWMP, based on a final SFPUC UWMP, indicating an inability to provide the typical water allocation over the long term, the City may enact/enforce water restrictions, up to and including moratoria on new water connections.

[159] BKF. 2020. *Burlingame Bay – Sanitary Sewer Demand Memorandum*. April 3.

[160] Ibid.

c. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments? (Less than Significant)

As described previously, the WWTP treats approximately 3.0 to 3.5 mgd of wastewater, which represents approximately 55 to 64 percent of the facility's 5.5 mgd capacity. Therefore, 36 to 45 percent of the WWTP's capacity remains available to treat wastewater. The existing buildings on the Project site are estimated to generate approximately 25,973 gpd (0.0259 mgd) of wastewater.[161] The additional sewer demand for the Project is estimated to be 24,000 gpd (0.024 mgd), resulting in a Project site total of 49,973 gpd (0.0499 mgd).[162] This additional wastewater demand due to the Project represents approximately 1.2 percent of the remaining wastewater treatment capacity (2.0 mgd) at the WWTP.[163] Currently, the remaining wastewater treatment capacity can accommodate the minimal increase in wastewater demand due to the Project. Therefore, the Project's impact would be ***less than significant***.

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? (Less than Significant)

The California Integrated Waste Management Act of 1989 (AB 939) requires municipalities to adopt an integrated waste management plan to establish objectives, policies, and programs related to waste disposal, management, source reduction, and recycling. In addition, Senate Bill 1383, passed in 2016, established a target that calls for a 50 percent reduction in organic waste by 2020 and a 75 percent reduction by 2025. As discussed above, the City is part of a regional JPA that manages solid waste collection and recycling services for several cities. The JPA is required to divert waste from landfills to achieve state reduction goals. In 2018, San Mateo County as a whole had a total diversion rate of 50.8 percent because of recycling and composting. Burlingame had a slightly lower diversion rate than the county, with 40.3 percent of waste diverted from landfills.[164]

Construction of the Project would result in demolition waste from the removal of parking lot pavement and trees. The Project would be required to comply with the City Construction and Demolition Recycling Ordinance (Chapter 8.17 of the Burlingame Municipal Code), which requires salvaging or recycling at least 60 percent of construction-related solid waste. In addition, operation of the Project would most likely increase overall solid waste generation because of the additional office uses compared with existing conditions on the site. However, operation of the proposed facility would be required to meet state and local standards regarding solid waste and recycling. The increase in the amount of solid waste generated would be considered negligible because the landfills that would be used would continue to have ample capacity and, therefore, would be able to handle the minimal increase.

It is anticipated that the Project could generate approximately 10,800 pounds per day (5.4 tons per day) of solid waste in the form of garbage as well as recycling and composting material. Although trash receptacles would be provided in the parking structure, this use is not expected to generate a

[161] Ibid.

[162] Ibid.

[163] 1.2 percent = (0.024 mgd Project wastewater/2.0 mgd remaining capacity) × 100 percent.

[164] Recology San Mateo County. 2019. *Annual Report to the SBWMA for Year 2018*. Available: https://rethinkwaste.org/wp-content/uploads/legacy_media/recology-annual-report-2018.original.pdf. Accessed: January 29, 2021.

significant amount of waste. The Shoreway Environmental Center is permitted to receive 3,000 tons of refuse per day.[165] Once collected and sorted at the Shoreway Environmental Center, solid waste is transported to Corinda Los Trancos Landfill, which is permitted to receive 3,598 tons per day.[166] Solid waste generated by operation of the Project would represent approximately 0.18 percent and 0.15 percent of the permitted capacity of the Shoreway Environmental Center and Corinda Los Trancos Landfill, respectively. As such, the Shoreway Environmental Center and the Corinda Los Trancos Landfill would have adequate capacity to serve the Project.

The Project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair attainment of solid waste reduction goals. Therefore, impacts from solid waste disposal would be ***less than significant.***

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? (Less than Significant)

The Project would develop office/R&D uses, which would not result in the generation of unique types of solid waste that would conflict with existing regulations regarding waste disposal. The Project would be required to comply with the City's solid waste disposal requirements, including recycling programs established under AB 939. As a result, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, and the impact would be ***less than significant***.

[165] RethinkWaste. 2021. *About Shoreway.* Available: https://rethinkwaste.org/shoreway-environmental-center/about/. Accessed: January 29, 2021.

[166] California Department of Resources Recycling and Recovery. 2019. *Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002).* Available: https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223. Accessed: January 27, 2021.

XX. Wildfire

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
If located in or near State Responsibility Areas or lands classified as Very High Fire Hazard Severity Zones, would the project:					
a.	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b.	Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment?	☐	☐	☐	☒
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Setting

The Project site is not located in a Moderate, High, or Very High Fire Hazard Severity Zone (FHSZ) of a State Responsibility Area. The closest Local Responsibility Area to the Project site is the Very High FHSZ located approximately 2.5 miles south of the site, east of I-280.[167] The closest State Responsibility Area to the Project site is the Moderate FHSZ located approximately 3.1 miles southwest of the site, west of I-280.[168]

Burlingame General Plan EIR

The Burlingame General Plan EIR found less-than-significant impacts related to wildfires with implementation of the following goals and policies from the Burlingame General Plan: Goal CS-2, Policy CS-2.2, Policy CS-2.3, Policy CS-2.4, and Policy CS-2.6. No mitigation measures were warranted.

[167] California State Geoportal. 2020. *California Fire Hazard Severity Zones.* Available: https://gis.data.ca.gov/datasets/31219c833eb54598ba83d09fa0adb346?geometry=-122.449%2C37.547%2C-122.188%2C37.595. Accessed: January 7, 2021.

[168] Ibid.

Discussion

a. Substantially impair an adopted emergency response plan or emergency evacuation plan? (Less than Significant)

The Project would construct a new structure on previously developed commercial land. Access points would be provided to ensure proper ingress for emergency vehicles. Although the City does not have an established evacuation plan, the Project would adhere to the guidelines established by the Community Safety Element of the Burlingame General Plan. Therefore, the Project would not conflict with an adopted emergency response or evacuation plan. The impact would be ***less than significant*** and was adequately addressed in the Burlingame General Plan EIR.

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? (No Impact)

The Project site is in an area that is highly developed and lacking features that normally elevate wildland fire risks (e.g., dry vegetation, steeply sloped hillsides). Because the Project site is not within or near a State Responsibility Area or a Very High FHSZ, there would be ***no impact.***

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts on the environment? (No Impact)

The Project would not require the installation or maintenance of infrastructure that would exacerbate fire risks, resulting in ***no impact.***

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? (No Impact)

The Project site does not include an area that is downslope or downstream from areas that could experience post-fire slope instability or drainage changes. Therefore, the Project would result in ***no impact*** regarding the exposure of people or structures to associated significant risks.

XXI. Mandatory Findings of Significance

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b.	Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c.	Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion

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

As described in Section IV, *Biological Resources*, the Project site is in a predominantly developed and urbanized area and surrounded by office development similar to that proposed by the Project. Other than the trees located on the Project site, there are no natural features that support habitat. Because the Project site is completely developed, it does not contain natural land cover or communities, protected wetlands/waters,[169] riparian habitat, or other sensitive natural communities.[170] The onsite ornamental vegetation is not considered a sensitive natural community. However, because of tree and landscape vegetation removal, the Project could remove nesting and roosting habitat. If nests are present onsite or in the surrounding area and eggs, nestlings, or nesting individuals are

[169] U.S. Fish and Wildlife Service. 2019. *National Wetland Inventory Wetland Mapper*. Available: https://www.fws.gov/wetlands/. Accessed: February 23, 2021.

[170] California Department of Fish and Wildlife. 2020. *California Sensitive Natural Communities*. September 9. Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=153609&inline. Accessed: February 26, 2021.

harmed or killed during tree removal or substantially affected by construction noise or nighttime lighting during operation, a significant impact could occur. However, implementation of Mitigation Measures BIO-1, BIO-2, BIO-3, and NOI-1, along with compliance with existing lighting regulations, would ensure that bats, including pallid bat, and resident or migratory birds, including peregrine falcon, would be protected. Therefore, with mitigation, the Project would not reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

As described in Section V, *Cultural Resources*, construction of the Project would not eliminate important examples of major periods of California history or prehistory. The Project would have no impact on a historical resource pursuant to Section 15064.5 of the CEQA Guidelines. Although no archaeological resources or human remains were identified at the Project site, such resources could be encountered during construction of the Project. Implementation of Mitigation Measures CUL-1 and CUL-2 would ensure that impacts on as-yet unknown cultural resources would be avoided and minimized.

With implementation of mitigation measures, the Project would not substantially degrade the quality of the environment, substantially reduce wildlife habitat, or eliminate important examples of major periods of California history or prehistory. These impacts would be ***less than significant with mitigation***.

b. Does the project have impacts that are individually limited but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.) (Less than significant with mitigation)

The cumulative impact analyses determined whether the Project in combination with other approved or foreseeable projects would result in a significant cumulative impact and, if so, whether the Project's contribution to the significant cumulative impact would be cumulatively considerable.

As discussed in Section III, *Air Quality*, the cumulative cancer risk and $PM_{2.5}$ concentrations at the maximally affected receptors would exceed BAAQMD thresholds for cumulative impacts. However, it should be noted that the health risk values for existing background sources associated with cancer risk and annual $PM_{2.5}$ concentrations exceed the BAAQMD's cumulative thresholds without the Project's contributions. As shown in Table 3-8, the Project's contribution to health impacts for the maximally affected receptor would be nominal. Furthermore, according to the BAAQMD CEQA guidelines, if a project would exceed the project-level thresholds of significance, then the proposed project would result in a significant impact and a cumulatively considerable contribution. As shown in Table 3-6 and Table 3-7, the Project would not exceed BAAQMD's project-level thresholds of significance. Accordingly, the contribution of the Project's emissions would not be cumulatively considerable.

The Burlingame General Plan EIR evaluated future development, as identified in the Burlingame General Plan. Chapter 22 of the Burlingame General Plan EIR concluded that implementation of the Burlingame General Plan would result in a less-than-significant impact with respect to cumulative impacts on the following resources: aesthetics; agricultural resources; air quality; biological resources; geology, soils, and minerals; hazards and hazardous materials; historic and cultural resources; hydrology and water quality; land use and planning; construction noise; population and housing; public services; and utilities. The Burlingame General Plan EIR would result in a significant and unavoidable impact due to an increase in noise levels on one segment of Broadway. Considering

the Project would not add a significant number of trips to this roadway segment,[171] the Project would not contribute to cumulatively considerable traffic noise impacts. Given the conclusions in the Burlingame General Plan EIR; given that the Project, with mitigation, would have a less-than-significant impact on the aforementioned resources; and given that future projects would be required to adhere to federal and state regulations, as well as local regulations identified in the Burlingame General Plan, the Project's contribution to impacts on the aforementioned resources would not be singularly or cumulatively considerable.

Chapter 10 of the Burlingame General Plan EIR includes the cumulative impact analysis of GHG emissions. The Burlingame General Plan EIR concluded that implementation of the Burlingame General Plan could result in a significant cumulative GHG impact because the City cannot conclusively demonstrate that implementation of the Burlingame General Plan would not generate GHG emissions that would exceed the City's existing and future GHG reduction goals. The Project's contribution to global climate change due to GHG emissions is discussed in Section VIII, *Greenhouse Gas Emissions*. Development of the Project would incorporate applicable policies of BAAQMD and comply with the City's Climate Action Plan. As discussed in Section VIII, *Greenhouse Gas Emissions,* the Project would be consistent with the state's GHG emissions reduction trajectory and the City's Climate Action Plan. Therefore, the Project's contribution to this cumulative impact would not be cumulatively considerable.

Chapter 18 of the Burlingame General Plan EIR includes the cumulative transportation impact analysis. The Burlingame General Plan EIR concluded that implementation of local regulations and Burlingame General Plan policies would ensure that cumulative transportation impacts would be less than significant. As discussed in Section XVII, *Transportation*, the Project would result in a less-than-significant impact with respect to VMT, design hazards, and emergency access. In addition, operation of the Project would result in a less-than-significant impact regarding conflicts with applicable plans. Given the Project's less-than-significant impacts with mitigation and given that future projects would be required to adhere to local regulations and Burlingame General Plan policies, the Project's contribution to cumulative transportation impacts would not be singularly or cumulatively considerable. Therefore, cumulative impacts would be ***less than significant with mitigation***, as required for this Project.

c. Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? (Less than Significant with mitigation)

As described in this document, implementation of the Project could result in temporary air quality, GHG, hazardous materials, and noise and vibration impacts during the construction period. Implementation of the mitigation measures recommended in this document would ensure that the Project would not result in environmental effects that would have substantial adverse effects on human beings. Impacts would be ***less than significant with mitigation***.

[171] TJKM. 2021. *Burlingame Bay Office Building at 567 Airport Boulevard Transportation Impact Analysis Report*. March 19. From the Institute of Transportation Engineers *Trip Generation Manual*, 10th edition, 2017.