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Initial Study/Mitigated Negative Declaration Addendum
619-625 California Drive Development Project
City of Burlingame, San Mateo County, California

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Table of Contents

Appendices

List of Exhibits

SECTION 1: INTRODUCTION

This Addendum, checklist, and attached supporting documents have been prepared to determine whether and to what extent the 619-625 California Drive Development Project Final Initial Study/Mitigated Negative Declaration (Final IS/MND) prepared for the City of Burlingame (City) remains sufficient to address the potential impacts of the proposed revised 619-625 California Drive Development Project (proposed project), or whether additional documentation is required under the California Environmental Quality Act (CEQA) (Public Resources Code [PRC] § 21000, *et seq*.).

1.1 - Initial Study/Environmental Checklist

Pursuant to Public Resources Code Section 21166, and CEQA Guidelines Sections 15162 and 15164, subd. (a), the attached Initial Study/Addendum has been prepared to evaluate the proposed project. The attached Initial Study/Addendum uses the standard environmental checklist categories provided in Appendix G of the CEQA Guidelines, but provides answer columns for evaluation consistent with the considerations listed under CEQA Guidelines Section 15162, subd. (a).

1.2 - Environmental Analysis and Conclusions

CEQA Guidelines Section 15164, subd. (a) provides that the lead agency or a responsible agency shall prepare an Addendum to a previously certified Environmental Impact Report (EIR) or adopted Mitigated Negative Declaration (MND) if some changes or additions are necessary but none of the conditions described in CEQA Guidelines Section 15162 calling for preparation of a subsequent EIR or MND have occurred (CEQA Guidelines, § 15164, subd. (a)).

An Addendum need not be circulated for public review but can be included in or attached to the Final EIR or MND (CEQA Guidelines § 15164, subd. (c)). The decision-making body shall consider the Addendum as part of the MND prior to making a decision on the proposed project (CEQA Guidelines § 15164, subd. (d)). An agency must also include a brief explanation of the decision not to prepare a subsequent EIR or MND pursuant to Section 15162 (CEQA Guidelines § 15164, subd. (e)).

Consequently, once an EIR or MND has been certified or approved for a project, no subsequent EIR or MND is required under CEQA unless, based on substantial evidence:

1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or MND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; [1]
2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or MND . . . due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

[1] CEQA Guidelines Section 15382 defines "significant effect on the environment" as " . . . a substantial, or potentially substantial adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance . . ." (see also Public Resources Code [PRC], § 21068).

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the MND was adopted . . . shows any of the following:

A. The project will have one or more significant effects not discussed in the previous EIR or MND;
B. Significant effects previously examined will be substantially more severe than shown in the previous EIR or MND;
C. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
D. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative (CEQA Guidelines, Section 15162, subd. (a); see also Pub. Resources Code, Section 21166).

This Initial Study/Addendum, checklist, and attached documents constitute substantial evidence supporting the conclusion that preparation of a supplemental or subsequent EIR or MND is not required prior to approval of the above-referenced permits by responsible and trustee agencies, and provides the required documentation under CEQA.

1.2.1 - Findings

There are no substantial changes proposed by the project proponent or the lead agency that would change the findings of the Draft IS/MND or in the circumstances in which the proposed project would be undertaken that would require major revisions of the Final IS/MND, or preparation of a new subsequent or supplemental EIR, due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. As described herein, the proposed project is consistent with the Final IS/MND, and would involve only minor changes; therefore, and Addendum is the appropriate CEQA compliance for the proposed project.

1.2.2 - Conclusions

The City of Burlingame may approve the revised proposed project based on this Addendum. The impacts of the proposed project remain within the impacts previously analyzed in the Final IS/MND (CEQA Guidelines § 15164).

1.3 - Mitigation Monitoring and Reporting Program

As required by Public Resources Code Section 21081.6, subd. (a)(1), a Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the proposed project in order to monitor the implementation of the mitigation measures that have been adopted for the proposed project. Any long-term monitoring of mitigation measures imposed on the overall development will be implemented through the MMRP.

SECTION 2: PROJECT DESCRIPTION

2.1 - Location and Setting

2.1.1 - Location

The proposed project site is located in the City of Burlingame, in San Mateo County, California (Exhibit 1). The 0.45-acre project site is located at 619-625 California Drive at the southeast corner of the intersection of California Drive and Oak Grove Avenue and consists of three parcels: Assessor's Parcel Numbers (APNs) 029-131-140, 029-131-150, and 029-131-160, which are also designated Lots L, M, and N, Block 6 in the Downtown Specific Plan (Exhibit 2).

2.1.2 - Environmental Setting

The parcel at 619 California Drive is currently vacant (there is no building on this parcel). The surrounding area is urban and developed. The parcel at 621 California Drive is occupied by an automobile repair shop, and the parcel at 625 California Drive contains a small office and one dwelling unit. Adjacent land uses to the project site are an automobile service facility to the east, 3-story multi-family residential buildings to the south, a retail building and a 3-story, multi-family residential building to the west, and a railroad right-of-way (Caltrain) to the north, on the opposite side of California Drive. Burlingame High School is located across the Caltrain tracks from the project site, and the Burlingame Caltrain station is 0.3 miles to the southwest.

2.1.3 - General Plan and Zoning

The site is within the Burlingame Downtown Specific Plan General Plan designation, and is zoned C-2, North California Drive Commercial District. Allowable floor area ratio (FAR) for in this zone is 3.0. The proposed project would have an FAR of 2.98.

2.2 - Project Background

2.2.1 - Previous IS/MND

In 2018, the City of Burlingame approved an IS/MND for a live/work project on the same site (2018 project). The 2018 IS/MND analyzed a proposed project that was similar, but which included 2,100 square feet of commercial space on the first floor that could have been retail or office. Twenty-six live-work units were proposed as part of the 2018 project for the building on four floors, with parking provided for the commercial uses and the live/work units. Additionally, a rooftop garden was proposed as an amenity for the tenants of the building.

The City's Zoning Code defines live/work as "a single unit (e.g., studio, loft or one-bedroom) consisting of both a commercial/office and a residential component that is occupied by the same resident. The live/work unit shall be the primary dwelling of the occupant." The Burlingame Downtown Specific Plan allows live/work units in the C-2, North California Drive Commercial District, where the project site is located.

2.3 - Project Characteristics

2.3.1 - Project Summary

The applicant has revised the 2018 project design to include an additional story and a total of 44 live/work units, rather than the previously approved 26 live/work units. The currently proposed building would be 5-stories high (54 feet, 8.75 inches), with parking on the ground floor. Although the revised project would have five floors instead of four, the height would remain essentially the same as the previously approved project because the height of each floor has been reduced and the rooftop garden would be eliminated. The 2018 project provided more loft-style units, with ceiling heights up to 14 feet, 9 inches. The proposed project has more conventional ceiling heights, ranging from 9 feet to 12 feet, 11 inches. Exhibit 4 shows the proposed site plan; Exhibit 5 shows a rendering of the proposed project from the corner of Oak Grove and California Drive, and also includes a simulation of a recently approved project at the corner of Floribunda Avenue and California Drive to provide a more complete context (construction of this project has not yet begun). Exhibit 5 shows the elevation of the proposed building.

The first floor would have a street entrance and lobby, conference room, and a workshare/co-working space for the use of the building's tenants. No commercial use space would be provided. The height of the building would be 54 feet, 8.75 inches, measured from the average top of curb to the top of the building roof, as shown in Exhibit 5. Table 1 compares the project characteristics of the proposed project with the 2018 project.

Table 1: Comparison of Revised Project to 2018 Project

	2018 IS/MND	2021 Proposed Project	Difference
Height	54 feet, 10 inches	54 feet, 8.75 inches	-1.25 inches
Average Floor to Ceiling height	11 feet, 9 inches	9 feet, 9 inches feet	Heights range by floor
Number of floors	4 plus rooftop garden	5	+1 floor
Residential units	26	44	+18 units
Commercial square feet	2,100	0	-2,100 sq. ft.
Total floor area	48,059	58,065	+10,006 sq. Ft.
Parking spaces	34	44	+10 spaces

2.3.2 - Parking and Circulation

The subject property is located within the boundaries of the Downtown Specific Plan area, and therefore qualifies for a reduced residential parking requirement, as specified in Municipal Code Section 25.70.032. Based on the number of proposed bedrooms per unit, the Zoning Code requires one parking space for each of the live/work units, a total of 44 spaces. The proposed project would provide 44 off-street parking spaces, in compliance with the requirements of Section 25.70.032.

Parking would be located in a garage on the ground floor, accessed via a driveway along Oak Grove Avenue (Exhibit 3). The 44 parking spaces would include 42 in vehicle stackers, one accessible van space, and one Electric Vehicle (EV) charging station for the live/work residents. The garage would be secured via an automatic overhead gate. No on-site guest parking would be provided, nor is any required for properties located within the Downtown Specific Plan area. A rack for four bicycles would also be provided.

2.3.3 - Landscaping and Other Features

Although there are no landscaping requirements in the C-2, North California Drive Commercial District, landscaping is proposed throughout the site. Several board-formed concrete and corten planters would be installed along the California Drive and Oak Grove Avenue frontages and at the rear of the building. The two existing street trees along California Drive and one existing street tree along Oak Grove Avenue would be retained. The proposed project includes five 36-inch box-size trees and five smaller trees to be planted throughout the property, along with additional planters that would be installed at the rear of the building. All plantings would be connected to a project irrigation system.

Some of the concrete planters would also function as stormwater biotreatment areas. These planters, which include those along California Drive and at the rear of the building, would contain a mix of grasses, low shrubs, and perennials that would be selected for their ability to thrive in treatment areas. Along with the biotreatment planters, the project proposes the installation of pervious pavement along walkways, entry paving, the patio, and the garage driveway to allow percolation of precipitation into the ground. A rooftop photovoltaic array with metal racking is proposed, along with a “cool roofing” membrane designed to reflect more sunlight and absorb less heat.

There are no requirements for private or common open space for commercial condominiums. However, the proposed project includes three private terraces for the live/work units on the fifth floor. The proposed project also includes private balconies/terraces for 21 of the 44 live/work units. A paved rear yard of 1,263 square feet would also be accessible to residents.

2.4 Discretionary Approvals

The proposed project requires the following discretionary approvals from the City of Burlingame:

- Commercial Design Review for construction of a new 44-unit live/work building (Municipal Code Sections 25.31.045 and 25.57.010(c)(1), as well as Chapter 5 of the Downtown Specific Plan). (Chapter 5, Section 5.2 provides design guidelines specifically for commercial and mixed-use areas within the Downtown Specific Plan area, while Section 5.4 provides more general design guidelines that apply to all areas of Downtown.)
- Conditional Use Permit for building height. The proposed building is 54 feet 8.75 inches in height, which is under the 55 feet 0 inches maximum height allowed by the C-2, North California Drive Commercial District zone. A Conditional Use Permit is required if a building exceeds 35 feet 0 inches in height (Municipal Code Section 25.31.060(c));
- Condominium Permit for construction of the new building, since each live/work unit would be privately owned (Municipal Code Section 26.30.020); and
- Lot Merger to combine the three existing parcels into one parcel.

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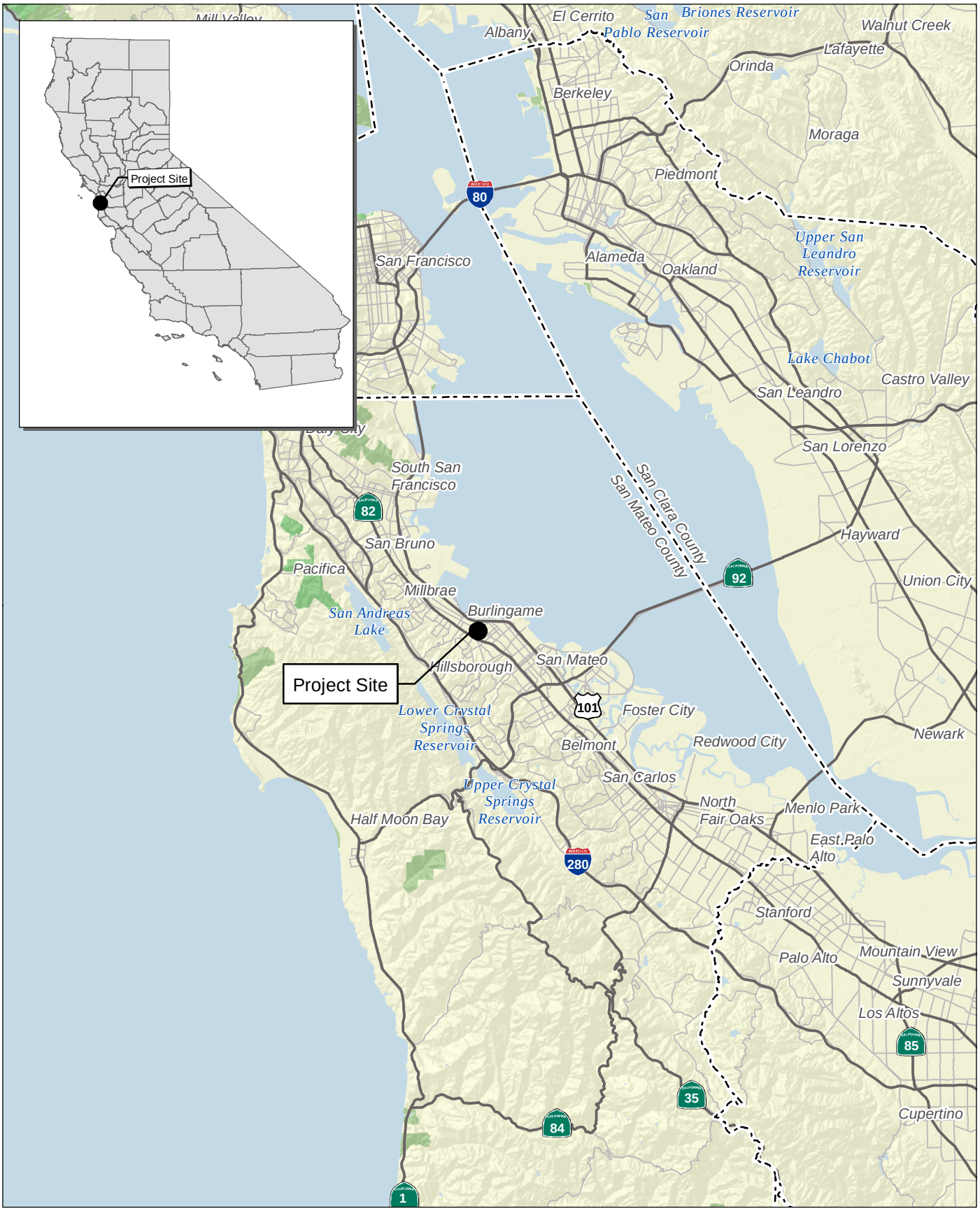

Source: Census 2000 Data, The California Spatial Information Library (CaSIL).

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5 2.5 0 5 Miles

Exhibit 1
Regional Location Map

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CITY OF BURLINGAME
ADDENDUM TO THE 619-625 CALIFORNIA DRIVE INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

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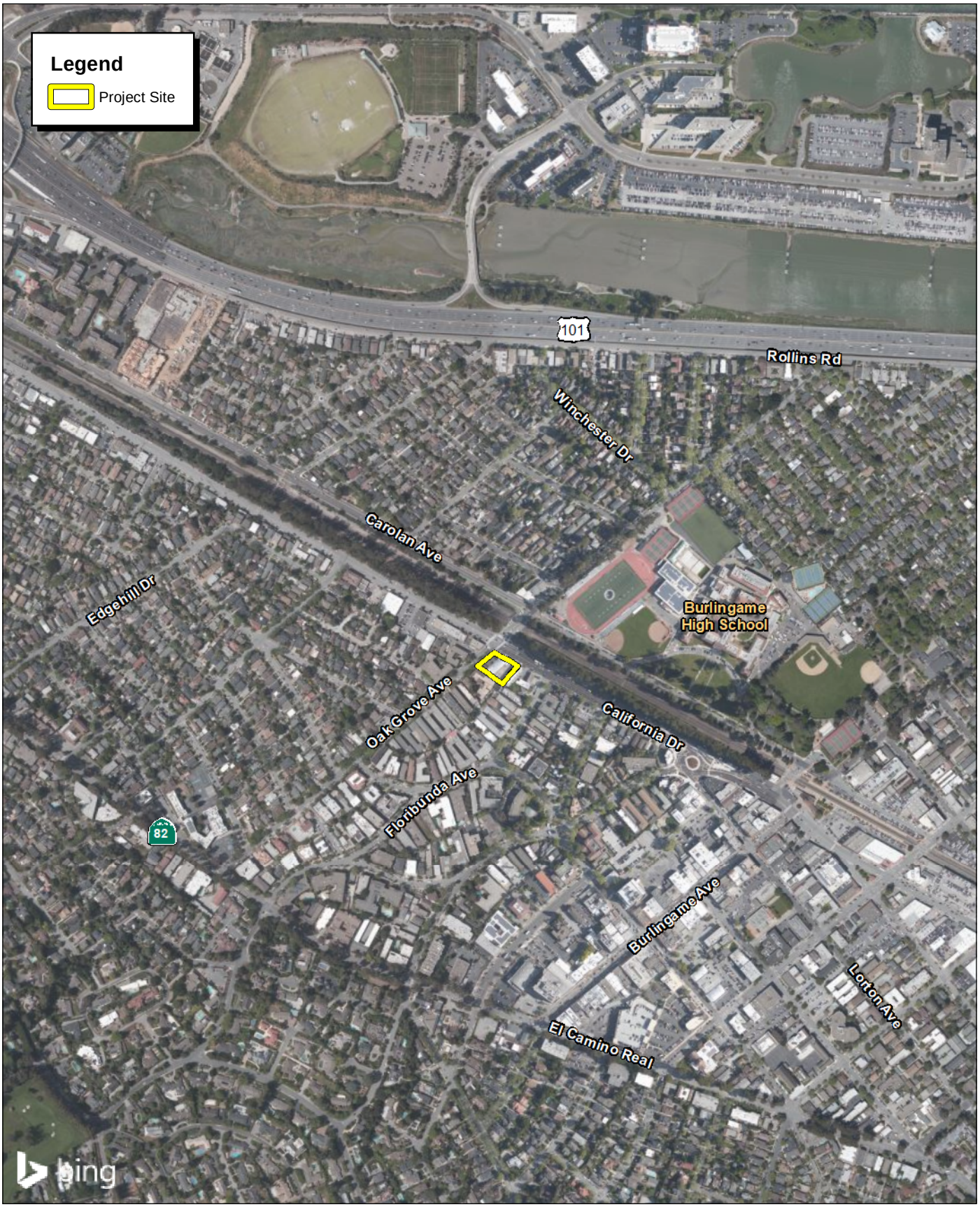

Source: Bing Aerial Imagery.

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750 375 0 750 Feet

Exhibit 2
Local Aerial Map

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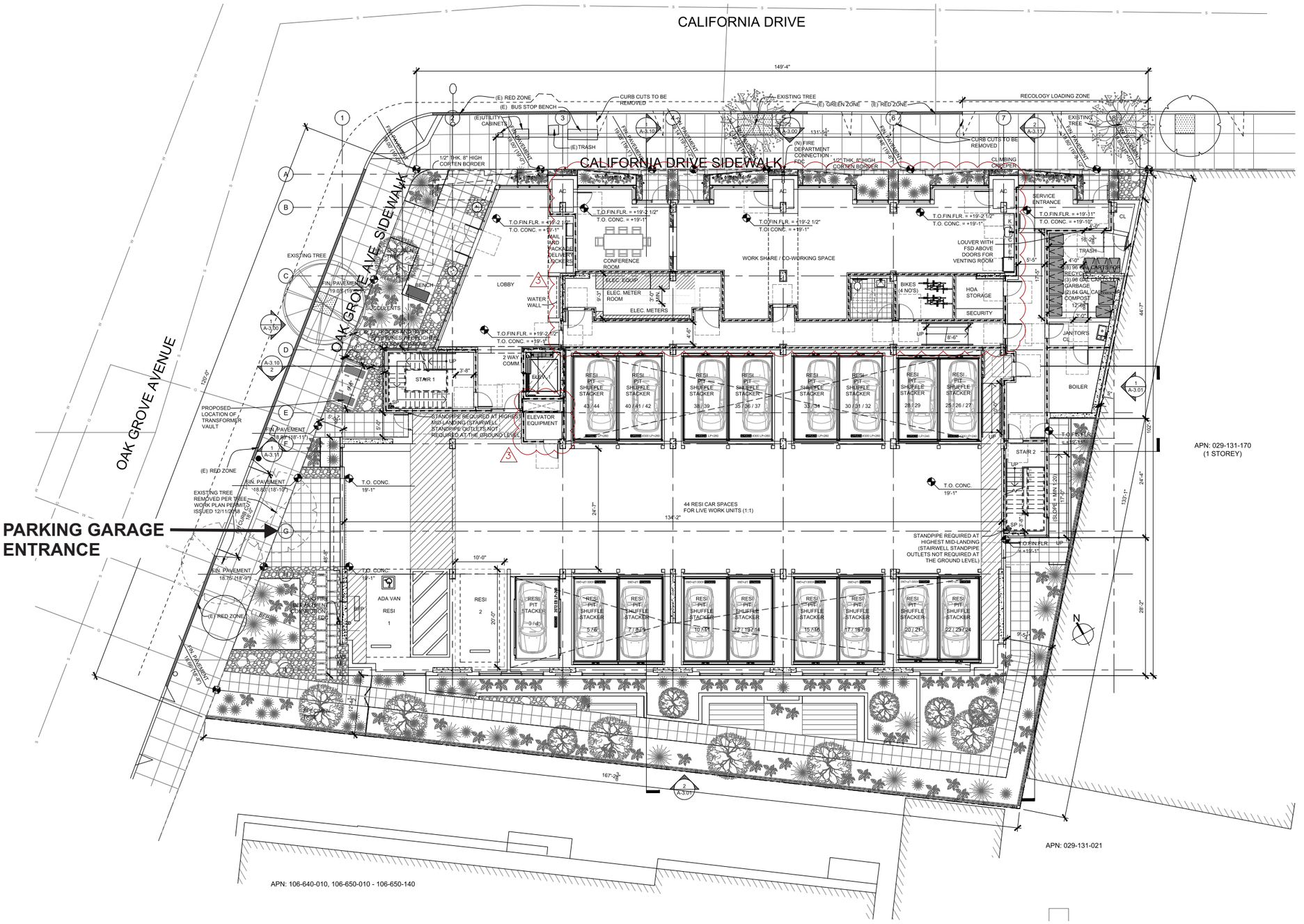

Source: ib+a Architecture, 1/25/2021.

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Exhibit 3
Site Plan

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Source: ib+a Architecture, 1/27/2021.

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Exhibit 4
View Montage

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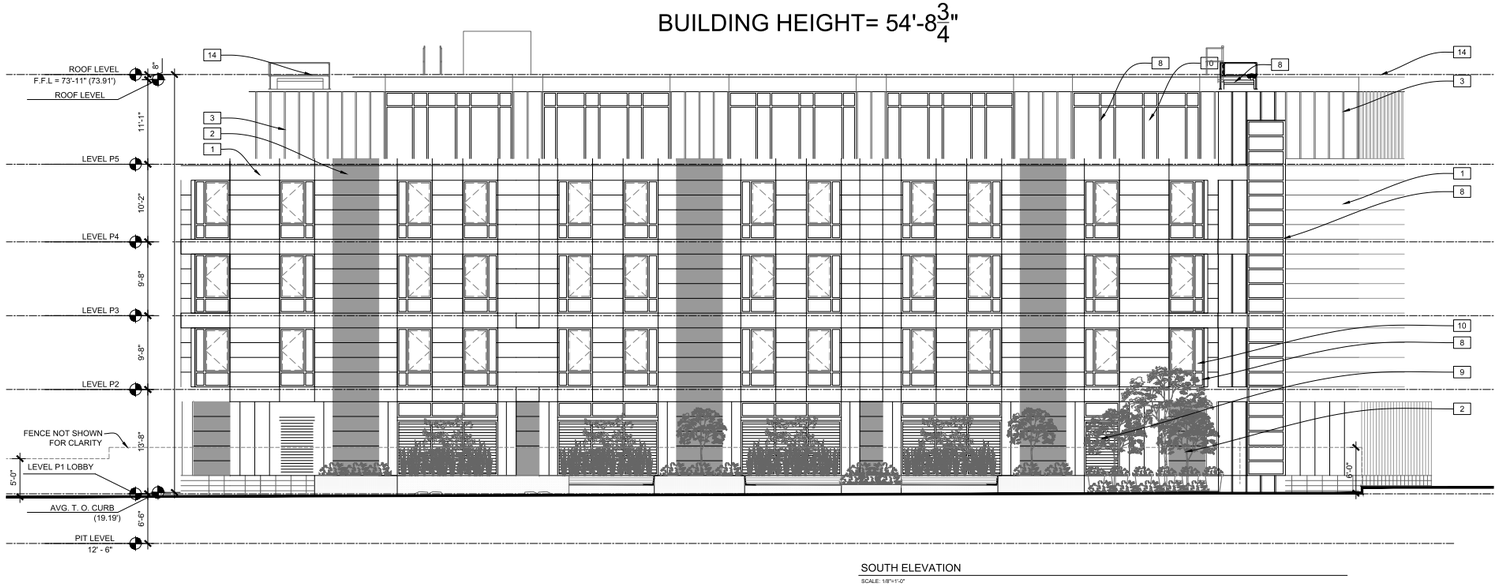
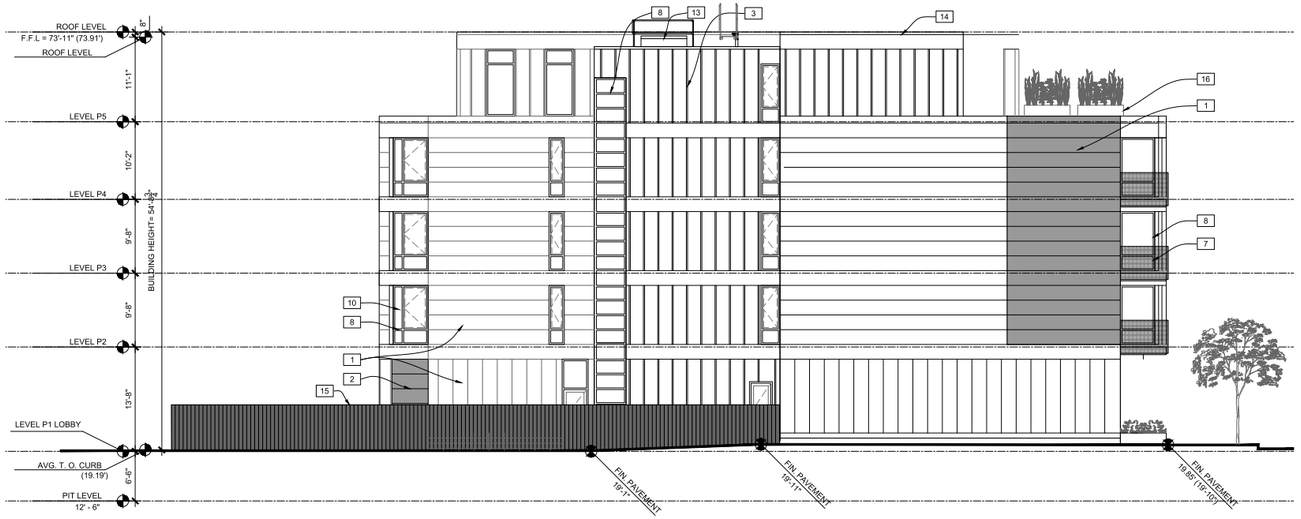


SOUTH ELEVATION

SCALE: 1/8"=1'-0"



WEST ELEVATION

SCALE: 1/8"=1'-0"

TYPICAL EXTERIOR MATERIALS

1. PARKLEX FACADE CLADDING
   PRODUCT: FACADE/ WOOD: QUARTZ
2. PARKLEX FACADE CLADDING
   PRODUCT: FACADE/ WOOD: AMBAR
3. AEPSPAN- BATTEN ROOFING SYSTEM
4. TILE OR COLOR MATCHED ARCHITECTURAL CONCRETE
5. CANOPY- STAINLESS STEEL
6. ROUND STAINLESS STEEL COLUMN WITH LINEAR MOSAIC TILES
7. ALUMINUM GRATING- PRODUCT: MC NICHOLS GAL-125
   FINISH- CLEAR ANODIZED
8. WINDOW FRAME- POWDER COATED (CLOSEST MATCH TO DARK GRAY- SW 7069- IRONORE)
9. ALUMINUM LOUVERS- FINISH: KYNAR COATED
   COLOR- DARK GRAY [SW 7069- IRONORE]
10. VISION GLASS PANEL
11. SHADOW BOX GLASS PANEL
12. GARAGE DOOR-ALUMINUM
    PRODUCT: RYTEC CORPORATION- SPIRAL LH MODEL
13. STEEL GUARDRAILS AT ROOF HATCH
14. ALUMINUM COPING- FINISH: CLEAR ANODIZED
15. PROPERTY LINE FENCE-
    PRODUCT: MIXED MATERIAL FENCE WITH MATTE BLACK ALUMINUM FRAME WITH VINYL INFILL BOARDS
16. CORTEN STEEL PLANTER
17. ARCADIA MULLION COVER CAP- ALUMINUM
18. ALUMINUM DOORS-
    PRODUCT: ALL WEATHER 7000 SERIES DOOR WITH GLASS INSERT
19. ALUMINUM SERVICE DDOR

Source: ib+a Architecture, 1/27/2021.

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SECTION 3: CEQA CHECKLIST

The purpose of the checklist is to evaluate the categories in terms of any changed condition (e.g., changed circumstances, project changes, or new information of substantial importance) that may result in a changed environmental result (e.g., a new significant impact or substantial increase in the severity of a previously identified significant effect) (CEQA Guidelines § 15162).

The questions posed in the checklist come from Appendix G of the CEQA Guidelines. A "no" answer does not necessarily mean that there are no potential impacts relative to the environmental category, but that there is no change in the condition or status of the impact since it was analyzed and addressed with mitigation measures in the Final IS/MND. These environmental categories might be answered with a "no" in the checklist, since the proposed project does not introduce changes that would result in a modification to the conclusion of the previously approved CEQA document.

This Addendum analyzes the conclusions of the 619-625 California Drive Development Project Final IS/MND.

3.1 - Explanation of Checklist Evaluation Categories

(1) Conclusion in the Final IS/MND and Related Documents

This column summarizes the conclusion of the Final IS/MND relative to the environmental issue listed under each topic.

(2) Do the Proposed Changes Involve New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(1), this column indicates whether the changes represented by the revised project will result in new significant environmental impacts not previously identified or mitigated by the Final IS/MND or whether the changes will result in a substantial increase in the severity of a previously identified significant impact.

(3) New Circumstances Involving New Impacts?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(2), this column indicates whether there have been substantial changes with respect to the circumstances under which the project is undertaken that will require major revisions to the Final IS/MND due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

(4) New Information Requiring New Analysis or Verification?

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3)(A-D), this column indicates whether new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the Final IS/MND was adopted, shows any of the following:

(A) The project will have one or more significant effects not discussed in the previous IS/MND or negative declaration;

(B) Significant effects previously examined will be substantially more severe than shown in the previous IS/MND;

(C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous IS/MND would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

If the additional analysis completed as part of this environmental review were to find that the conclusions of the Final IS/MND remain the same and no new significant impacts are identified, or identified impacts are not found to be substantially more severe, or additional mitigation is not necessary, then the question would be answered "no" and no additional environmental document would be required.

(5) Mitigation Measures Implemented or Address Impacts

Pursuant to CEQA Guidelines Section 15162, subd. (a)(3), this column indicates whether the Final IS/MND provides mitigation measures to address effects in the related impact category. Any previously adopted mitigation measures will be identified. The response will also address proposed revisions to previously adopted mitigation measures. These mitigation measures will be implemented with the construction of the project, as applicable. If "NA" is indicated, the Final EIR has concluded that the impact either does not occur with this Project or is not significant, and therefore no additional mitigation measures are needed.

3.2 - Discussion and Mitigation Sections

(1) Discussion

A discussion of the elements of the checklist is provided under each environmental category in order to clarify the answers. The discussion provides information about the particular environmental issue, how the project relates to the issue, and the status of any mitigation that may be required or that has already been implemented.

(2) Mitigation Measures

Applicable mitigation measures from the Final IS/MND that apply to the proposed project are listed under each environmental category.

(3) Conclusions

A discussion of the conclusion relating to the analysis is contained in each section.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
I. Aesthetics, Light, and Glare *Except as provided in Public Resources Code Section 21099, would the project:*					
a) Have a substantial adverse effect on a scenic vista?	No impact	No	No	No	None
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a State Scenic Highway?	Less than significant impact	No	No	No	None
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than significant impact	No	No	No	None
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than significant impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would have a substantial effect on a scenic vista. The 2018 IS/MND concluded that the City has not designated any scenic vistas in the vicinity of the project site. It was determined that no impact would occur, and no mitigation measures were required.

While there are proposed changes to the project, the project site would remain the same and there are still no scenic vistas in the area of the project site. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway. The 2018 IS/MND concluded that the project site is not visible from any State designated scenic corridor or highway, including State Route 82 and Interstate 280, located 2.4 miles to the west of the project site. The applicant proposed to remove a 24-diameter red oak street tree along Oak Grove Avenue. The City Arborist determined that the tree was in poor condition and the tree would need to be replaced with a 24-inch box red oak (*Quercus rubra*). Impacts were determined to be less than significant.

The proposed changes to the 2018 project would not increase the height of the building or the building footprint significantly. As a result, the project site would still not be visible from any State Designated Scenic Highway. The two existing street trees along California Drive would be retained in the revised project. One existing street tree along Oak Grove Avenue would be retained. The proposed project includes five 36-inch box-size trees and five smaller trees to be planted throughout the property. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether the 2018 project would substantially degrade the existing visual character or quality of the site and its surroundings. The 2018 IS/MND concluded that the 2018 project would be consistent with the North California Drive Commercial District (C-2) in the Zoning Code and the Downtown Specific Plan as well as the Specific Plan's goal to establish a sensitive transition between existing residential and the downtown area. The City's design review standards and processes ensure that the project is consistent with the design guidelines of the Downtown Specific Plan. While the building height would be greater than that of adjacent buildings, the 2018 ISMND concluded that it would maintain the commercial character of the area, and determined that impacts would be less than significant.

The proposed project is located in a transition area between residential uses along Oak Grove Avenue and Commercial uses along California Drive and within downtown Burlingame. The proposed project would still comply with the Zoning Code and the Specific Plan C-2 designation. Although the proposed changes to the 2018 project include the addition of a fifth floor, the applicant has proposed to decrease the height of each floor such that the proposed changes would result in a building that would be 1.25 inches shorter than the originally proposed building height. Therefore, the proposed project would still comply with the 55-foot height maximum for the Specific Plan North California Drive Commercial District. The proposed project would still require a conditional use permit, since the proposed building height would exceed 35 feet. The proposed project would also still require a Condominium Permit, which includes review of the location and size of the proposed building, parking layout, location, use of the common areas and trash enclosures, and landscaping.

Additionally, per the requirement of the City, a shadow analysis was conducted for the proposed project. Although shade and shadow is not a consideration under CEQA, this Study is included in Appendix B to provide additional information about how the building would affect the visual character of the site.

For the 2018 IS/MND, FCS conducted a visual analysis by creating computerized visual simulations using site photos and architectural plans for the 2018 project. Exhibit 4 displays street-level visual simulations of the project from California Drive and Oak Grove Avenue. The visual analysis in the 2018 IS/MND determined that the project would maintain the visual character of the surrounding area. The proposed project is in the same location as the 2018 project, with a similar mass and height. Exhibit 4 depicts the project's finished materials, building form, height and scale, and proposed landscaping. Like the 2018 project, the finished materials on the building would consist of a color scheme of browns, whites, and dark greys. and would have a modern architectural style. While the modern architectural style is characteristic of a commercial building, residential characteristics appear in the landscaping and in-unit balconies, supporting a transition from a commercial to residential area. Landscaping and street trees would be planted on both street-facing sides of the project, as was featured in the 2018 project.

The proposed project would still conform to setbacks of existing surrounding buildings. Similar to the conclusions in 2018 ISMND, the building as currently proposed would be taller than the other commercial buildings along California Drive and the residential buildings along Oak Grove Avenue, but would maintain both commercial and residential characteristics to be consistent with the transitional nature of the area.

The City's design review standards and processes would ensure that the proposed project remains consistent with the design guidelines of the Downtown Specific Plan and would not significantly affect the existing visual character of the site or its surroundings. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. The 2018 IS/MND concluded that the 2018 project would introduce new sources of lighting, including building-mounted light fixtures and light originating from inside the residential units. The applicant would comply with the Burlingame Municipal Code. Low-level lighting would be installed throughout the project site, but it would be shielded and directed to minimize spillover. The City's review would ensure final design plans are in accordance with the electrical code regulations. It was determined that impacts would be less than significant.

The proposed changes to the 2018 project would not substantially alter the sources of lighting. All sources of light would still emanate from residential units and low-level lighting installed throughout the project site, and would be shielded and directed to decrease spillover. The applicant would still be required to comply with the Burlingame Municipal Code and the City's review would ensure the proposed project is consistent with electrical code regulations.

Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to aesthetics, light, and glare, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
II. Agricultural and Forest Resources *In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in 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?	No impact	No	No	No	None
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No impact	No	No	No	None
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No impact	No	No	No	None
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No impact	No	No	No	None

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No impact	No	No	No	None

Discussion

a)-e) The 2018 IS/MND considered potential impacts to agricultural resources. The 2018 IS/MND concluded that the 2018 project would have no impact on agriculture or forestry resources because the project site is designated Urban Land by the Department of Conservation Farmland Inventory Map.[2] The project site does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project site is zoned C-2, North California Drive Commercial District, which does not contain agriculture or forest uses. The project site is not subject to a Williamson Act contract. There are no existing agriculture or forest uses adjacent to or in the immediate vicinity of the project site. It was determined that no impact would occur, and no mitigation measures were required.

The proposed changes to the 2018 project would not alter the project site and the same land use designations apply. Neither the project site nor the vicinity of the project site contains farmland or forest designations or uses. Therefore, the proposed project would not introduce impacts to agriculture and forestry resources or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to agricultural and forest resources, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

[2] California Department of Conservation. 2016. California Important Farmland Finder. Website: https://maps.conservation.ca.gov/DLRP/CIFF/. Accessed April 6, 2021.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
III. Air Quality *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?	Less than significant impact with mitigation incorporated	No	No	No	MM AIR-1, MM AIR-2
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	Less than significant impact with mitigation incorporated	No	No	No	MM AIR-1
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?	Less than significant impact with mitigation incorporated	No	No	No	MM AIR-1
d) Expose sensitive receptors to substantial pollutant concentrations?	Less than significant impact with mitigation incorporated	No	No	No	MM AIR-2
e) Create objectionable odors affecting a substantial number of people?	Less than significant impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would conflict with or obstruct implementation of the applicable air quality plan. The 2018 IS/MND found that the 2018 project would be consistent with growth assumptions of the applicable air quality plan, the Bay

Area Air Quality Management District's (BAAQMD) Bay Area 2017 Clean Air Plan. The 2018 IS/MND found that the 2018 project would not create a localized violation of State or federal ambient air quality standards, significantly contribute to cumulative non-attainment pollutant violations, expose sensitive receptors to substantial pollutant concentrations, or result in significant greenhouse gas (GHG) emissions after implementation of Mitigation Measure (MM) AIR-1 and MM AIR-2. MM AIR-1 would require the implementation of BAAQMD dust control measures during construction and MM AIR-2 would require the utilization of construction equipment that meets United States Environmental Protection Agency (EPA) Tier IV off-road engine standards for all engines in excess of 50 horsepower (hp). In addition, the 2018 IS/MND found that the 2018 project would not conflict with, or otherwise create an impediment or disruption to, any applicable control measure under the 2017 Clean Air Plan. The 2018 IS/MND found that the 2018 project would have a less than significant impact after mitigation.

As illustrated previously in Table 1, the proposed project would result in an overall increase in land use development when compared to the 2018 IS/MND. As shown therein, the 2018 IS/MND analyzed the development of 26 residential units across 4 floors, 2,100 square feet of commercial space, and 34 parking spaces. The proposed project would involve the development of 44 residential units across 5 floors, no commercial space, and 44 parking spaces. As a result, an additional 18 residential units, 7,936 square feet of building space, and 10 parking spaces would be developed beyond what was analyzed in the 2018 IS/MND. The additional residential units would result in the introduction of a greater number of future residents than what was analyzed in the 2018 IS/MND; however, the proposed project would remain within the density allowances of the land use designation for the project site and would therefore remain within the maximum population growth envisioned by the 2017 Clean Air Plan. The proposed project would otherwise largely remain the same as that analyzed in the 2018 IS/MND and would not conflict with the goals or control measures of the 2017 Clean Air Plan. Therefore, the proposed project would not result in any new or more severe impacts related to air quality beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would violate any air quality standard or contribute substantially to an existing or projected air quality violation. The 2018 IS/MND stated that construction emissions would be substantially below the BAAQMD thresholds of significance and the 2018 project would have less than significant impacts related to emissions reactive organic gas (ROG), nitrous oxides (NO_X), exhaust PM_{10} (particulate matter including dust, 10 micrometers or less in diameter), and exhaust $PM_{2.5}$ (particulate matter, including dust, 2.5 micrometers or less in diameter). The 2018 IS/MND further discussed that the 2018 project would implement Best Management Practices (BMPs) recommended by the BAAQMD through MM AIR-1 to reduce potential impacts related to fugitive dust emissions during construction. Therefore, project construction was determined to have a less than significant impact after implementation of mitigation.

The 2018 IS/MND stated that the 2018 project would not result in operational-related air pollutants or precursors that would exceed BAAQMD's thresholds of significance, illustrating that long-term operational impacts associated with criteria pollutant emissions would be less than significant. Therefore, the 2018 IS/MND determined that this impact would be less than significant, and no mitigation was required.

The 2018 IS/MND stated that the 2018 project would not conflict with the applicable congestion management plan. Furthermore, the 2018 IS/MND identified that no intersections impacted by the 2018 project would experience traffic volumes of 44,000 vehicles per hour and the adjacent roadways are not located in an area where vertical or horizontal atmospheric mixing is substantially limited. Therefore, the 2018 project would not exceed the carbon monoxide (CO) screening criteria and was determined to have a less than significant impact related to CO.

As previously discussed, the proposed project would result in the development of an additional 18 residential units, 7,936 square feet of building space, and 10 parking spaces beyond what was analyzed in the 2018 IS/MND; however, the proposed project would not constitute the disturbance of ground area greater than what was analyzed in the 2018 IS/MND. In addition, the net increase of 10,036 square feet of residential space is the result of the addition of a fifth residential floor. As shown in Table 1, the proposed building analyzed in the 2018 IS/MND would have been 54 feet 10 inches in height, and the proposed project would result in a building height of 54 feet 8.75 inches. Therefore, construction of the proposed building under the proposed project is not anticipated to result in a greater intensity of construction activities than those analyzed under the 2018 IS/MND to the extent that BAAQMD significance thresholds would be exceeded. In addition, as illustrated in Table 2, the proposed project would not result in a substantial increase in construction duration when compared with that analyzed in the 2018 IS/MND.

Table 2: Updated Construction Schedule

	Total Workdays	
Construction Activity	**2018 IS/MND**	**Proposed Project**
Demolition	8 Days	8 Days
Site Preparation	21 Days	21 Days
Grading	7 Days	7 Days
Building Construction	320 Days	320-360 Days
Paving	3 Days	3 Days
Architectural Coating	14 Days	14 Days
Total	**373 Days**	**373-413 Days**
Source: Hurin, Ruben. Planning Manager, City of Burlingame. Personal Communication: e-mail. March 25, 2021.		

As shown in Table 2, the proposed project could result in up to 40 additional workdays for building construction activities when compared with the 2018 IS/MND. The extension of building construction activities from 320 workdays to 360 workdays would constitute an approximately 12.5 percent increase in the number of workdays. As the intensity—or the daily equipment use—of project construction would not change from that analyzed in the 2018 IS/MND, the daily emission estimates would remain unchanged from those disclosed in the 2018 IS/MND. Assuming the proposed project would result in the addition of 40 workdays during building construction activities, the proposed project would result in an approximately 12.5 percent increase in building construction emissions. The 2018 IS/MND determined that total annual construction emissions would fall well below the applicable BAAQMD significance thresholds. Therefore, the addition of up to 40 construction workdays for the proposed project would not cause construction emissions to exceed the applicable BAAQMD significance thresholds. Furthermore, MM AIR-1 would continue to apply to the proposed project to reduce the generation of fugitive dust emissions to the extent practicable. Therefore, the proposed project would not result in any new or more severe impacts related to construction emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

As illustrated previously in Table 1, the proposed project would result in an overall increase in land use development when compared to the 2018 project as analyzed in the 2018 IS/MND. Most notably, the proposed project would result in the construction and operation of 18 more residential units than were analyzed in the 2018 IS/MND. Because the majority of operational emissions in the 2018 IS/MND would be generated from area sources, principally from the use of consumer products, and the operation of motorized vehicles, which are considerably influenced by the number of proposed residential units, operational emissions generated from the proposed project were remodeled for this analysis.

Operation of the proposed project was modeled using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. The modeling results shown in Table 3 and Table 4 represent updates to the proposed project from the 2018 IS/MND, including the addition of 18 residential units, the increase in residential building square footage, the increase in ground-level parking garage space, the increase in daily vehicle trips, and the removal of commercial space. Modeling outputs are contained in Appendix C. The updated modeling results are shown in Table 3 and Table 4.

Table 3: Daily Operational Emissions (Unmitigated)

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	1.62	0.17	0.03	0.03
Energy	0.01	0.10	0.01	0.01
Mobile	0.26	0.68	0.96	0.26
Estimated Maximum Daily Emissions	1.89	0.95	1.00	0.30
Thresholds of Significance	**54**	**54**	**82**	**54**

Emissions Source	Pounds per Day			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
ROG = reactive organic gases
NO_X = nitrous oxides
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix C).

Table 4: Annual Operational Emissions (Unmitigated)

Emissions Source	Tons per Year			
	ROG	NO_X	PM_{10}	$PM_{2.5}$
Area	0.28	<0.01	<0.01	<0.01
Energy	<0.01	0.02	<0.01	<0.01
Mobile	0.04	0.12	0.17	0.05
Estimated Annual Emissions	0.33	0.14	0.17	0.05
Thresholds of Significance	**10**	**10**	**15**	**10**
Exceeds Significance Threshold?	**No**	**No**	**No**	**No**

Notes:
ROG = reactive organic gases
NO_X = oxides of nitrogen
PM_{10} = particulate matter 10 microns or less in diameter
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
Source: CalEEMod Output (see Appendix C).

As displayed in Table 3 and Table 4, the proposed project's operational emissions would not exceed BAAQMD significance thresholds. It should also be noted that the above emission estimates do not incorporate reductions from the emissions generated by existing land uses. Therefore, the emissions estimates presented in this analysis represent a conservative assessment of emissions generated by the proposed project.

As discussed in the Traffic Impact Analysis (TIA) prepared for the proposed project,[3] the proposed project would result in an estimated 195 net daily vehicle trips after accounting for the foregone vehicle trips generated by existing land uses. As the 2018 IS/MND estimated the 2018 project to generate 123 net daily vehicle trips, the proposed project would result in 72 net daily vehicle trips during operation beyond what was analyzed in the 2018 IS/MND, principally due to the addition of 18 residential units. As displayed in Figure 9 of the TIA,[4]

[3] Hexagon Transportation Consultants, Inc. 2021. 619-625 California Drive Live/Work Development Draft Traffic Impact Analysis. March 12.

[4] Hexagon Transportation Consultants, Inc. 2021. 619-625 California Drive Live/Work Development Draft Traffic Impact Analysis. March 12.

which displays the Existing Plus Project peak-hour traffic volumes, the studied intersection that would experience the greatest traffic volumes during project operation would be the intersection of Oak Grove Avenue and El Camino Real. As shown therein, that intersection would experience an estimated 2,435 vehicle trips during the AM peak-hour and an estimated 2,552 vehicle trips during the PM peak-hour. As a result, the proposed project would not exceed the BAAQMD screening threshold for CO hotspots of 44,000 vehicle per hour. Therefore, the proposed project would not result in any new or more severe impacts related to operational emissions or CO hotspots beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether the 2018 project would result in a cumulative considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors). The 2018 IS/MND stated that emissions from construction-related activities are generally short-term in duration but may still cause adverse air quality impacts. The proposed project would generate emissions from construction equipment exhaust, worker travel, and fugitive dust. These construction emissions include criteria air pollutants from the operation of heavy construction equipment. The proposed project's construction emissions would not exceed BAAQMD significance thresholds after the application of mitigation. Therefore, the proposed project would have a less than significant cumulative impact during construction after incorporation of MM AIR-1.

The 2018 IS/MND stated that the 2018 project's operational emissions would not exceed BAAQMD significance thresholds and project operations would have a less than significant cumulative impact.

As previously discussed, the proposed project would involve the development of a building of comparable size and the same area of disturbance as that analyzed in the 2018 IS/MND. Therefore, construction of the proposed building under the proposed project is not anticipated to result in a greater intensity or duration of construction activities than those analyzed under the 2018 IS/MND to the extent that BAAQMD significance thresholds would be exceeded. Furthermore, MM AIR-1 would continue to apply to the proposed project to reduce the generation of fugitive dust emissions to the extent practicable. Therefore, the proposed project would not result in any new or more severe cumulative impacts related to construction emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

As displayed in Table 3 and Table 4, the proposed project would not generate operational emissions beyond BAAQMD significance threshold. In addition, as discussed under Impact (b), the proposed project would not generate enough vehicle trips to result in a CO hotspot on the nearby roadway network. Therefore, the proposed project would not result in any new or more severe cumulative impacts related to operational emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project would expose sensitive receptors to substantial pollutant concentrations. The 2018 IS/MND stated that existing sensitive residential receptors are located to the west, south, and north of the project site. Burlingame High School, another sensitive receptor, is located across the Caltrain/Freight line northeast from the project site. Burlingame Montessori School is located 260 feet east of the project site.

The following four criteria were applied in the 2018 IS/MND to determine if the 2018 project would have a less than significant impact on sensitive receptors:

- **Criterion 1:** Construction of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 2:** Operation of the project would not result in an exceedance of the health risk significance thresholds.
- **Criterion 3:** The cumulative health impact would not result in an exceedance of the cumulative health risk significance thresholds.
- **Criterion 4:** A CO hotspot assessment must demonstrate that the project would not result in the development of a CO hotspot that would cause an exceedance of the CO ambient air quality standards.

The 2018 IS/MND determined that unmitigated project construction emissions would have a potentially significant impact on sensitive receptors. Therefore, MM AIR-2 which would be applied to the proposed project, which would require all off-road construction equipment in excess of 50 hp used on-site by the developer or contractors be equipped with engines meeting the EPA Tier IV off-road engine emission standards. This would reduce cancer risks and hazards associated with construction emissions. As discussed in the 2018 IS/MND, estimated health risks and hazards would not exceed the BAAQMD's thresholds of significance after application of MM AIR-2. Therefore, with implementation of MM AIR-2, the 2018 project's construction emissions were determined to not result in significant health impacts to nearby sensitive receptors.

The 2018 IS/MND stated that the nature of the 2018 project as a live/work building with ground-level commercial space would not result in the generation of on-site toxic air contaminants (TAC) sources during operation. The 2018 IS/MND described that the 2018 project was expected to generate 123 new daily vehicle trips, primarily from residents, visitors, employees, and customers traveling to and from the project site in passenger vehicles. Because nearly all passenger vehicles are gasoline-fueled, the 2018 project would not generate significant amount of diesel particulate matter (DPM) emissions during operation. Therefore, the 2018 project was determined to not result in significant health impacts to nearby sensitive receptors during operation.

The BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project, including nearby major roadways, freeways, rail lines, and stationary sources. The result of the cumulative health risk during project construction from the 2018 IS/MND are summarized in Table 5.

Table 5: Summary of the Cumulative Health Impacts at the MIR during Construction

Source	Source Type	Distance from MIR[1] (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)
Project					
Construction (with mitigation)	Diesel Construction Equipment	22	3.8	<0.01	0.02
Existing Stationary Sources (BAAQMD Facility Number)[2],[3]					
G5709 14937 14463 14474 5283	Gas Station Dry Cleaner Diesel Generator Diesel Generator Dry Cleaner	164 646 1052 730 1099	2.5 0.0 2.0 3.6 10.5	0.02 0.0 0.02 <0.01 0.03	ND 0.0 0.01 0.01 0.0
Caltrain/Freight Railroad					
Caltrain/Freight[3]	Diesel Locomotives	344	9.1	<0.01	0.03
Cumulative Health Risks					
Cumulative Total with Project Construction **BAAQMD's Cumulative Thresholds of Significance** Threshold Exceedance?			31.5 **100** No	0.08 **10** No	0.07 **0.8** No

Notes:
HI = hazard index
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
BAAQMD = Bay Area Air Quality Management District
$\mu g/m^3$ = micrograms per cubic meter
[1] The maximum impacted sensitive receptor (MIR) is a residence adjacent to project site, 22 feet southwest of the site along Oak Grove Avenue.
[2] Cancer risks reflect the current BAAQMD cancer risk guidance for diesel generators and gasoline stations
[3] Assumes emissions remain constant with time
Source: Attachments B and E of the Health Risk Assessment (HRA) Technical Memorandum contained in Appendix B of the 2018 IS/MND.

As noted in Table 5 and in the 2018 IS/MND, the cumulative impacts from mitigated project construction and existing sources of TACs would be less than the BAAQMD's cumulative thresholds of significance. Thus, the cumulative health risk impacts from project construction were determined to be less than significant with mitigation incorporated.

Finally, the 2018 IS/MND stated that, as discussed under Impact (b), the operational CO hotspot impact resulting from project operations was determined to be less than significant.

Project as a Receptor

The 2018 IS/MND states that the project would locate new sensitive receptors (residents) that could be subject to existing sources of TACs at the project site. However, the California Supreme Court in *California Building Industry Association v. Bay Area Air Quality Management District* concluded that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. Therefore, impacts from existing sources of TAC emissions on sensitive receptors on the project site are

not subject to CEQA. For informational purposes, the City has elected to disclose impacts from existing sources of TAC emissions on the future residences. As described in the HRA memo contained in Appendix B of the 2018 IS/MND, cumulative health impacts from the existing TAC sources for future project on-site residents were determined to not exceed the BAAQMD's cumulative threshold of significance and be less than significant.

As previously discussed, proposed project would involve the development of a building of comparable size and the same area of disturbance to that analyzed in the 2018 IS/MND. Furthermore, MM AIR-2 would continue to apply to the proposed project to reduce the generation of DPM during construction activities. Therefore, construction of the proposed building under the proposed project is not anticipated to result in a greater intensity or duration of construction activities than those analyzed under the 2018 IS/MND to the extent that BAAQMD cancer risk thresholds would be exceeded. Therefore, the proposed project would not result in any new or more severe health impacts related to construction emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

The proposed project would not change the nature of the 2018 project as a live/work building and would not result in the generation of on-site TACs sources during operation. As discussed in the TIA prepared for the proposed project,[5] the proposed project would result in an estimated 195 net daily vehicle trips after accounting for the foregone vehicle trips generated by existing land uses. As the 2018 IS/MND estimated the previously analyzed 2018 project to generate 123 net daily vehicle trips, the proposed project would result in 72 net daily vehicle trips during operation beyond what was analyzed in the 2018 IS/MND, principally due to the addition of 18 residential units. These vehicle trips would be generated primarily from residents and visitors traveling to and from the project site in passenger vehicles. Because nearly all passenger vehicles are gasoline-fueled, the proposed project would not generate significant amounts of DPM emissions during operation. As a result, the proposed project would not result in significant health impacts to nearby sensitive receptors during operation. Therefore, the proposed project would not result in any new or more severe health impacts related to operational emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

As previously mentioned, the BAAQMD recommends assessing the potential cumulative impacts from sources of TACs within 1,000 feet of a project, including nearby major roadways, freeways, rail lines, and stationary sources. The result of the cumulative health risk during project construction from the 2018 IS/MND are summarized in Table 5. As shown therein, the cumulative health risk at the maximum impacted sensitive receptor during project construction would be less than significant with mitigation incorporated. However, an approved development project would occur at 601 California Drive, Burlingame, approximately 150 feet southeast of the project site. This project was approved after the 2018 IS/MND.

[5] Hexagon Transportation Consultants, Inc. 2021. 619-625 California Drive Live/Work Development Draft Traffic Impact Analysis. March 12.

As discussed in the construction HRA conducted for that development project,[6] the maximum impacted sensitive receptor would experience an excess cancer risk of 8.9 in one million, a maximum hazard index of 0.005, and a maximum annual average $PM_{2.5}$ concentration of 0.054 µg/m^3. The maximum impacted sensitive receptor for each project is unlikely to be the same because the location of the maximum impacted sensitive receptor is a function of the local meteorological conditions, the distance between the emissions source and the receptor, the direction from which the receptor is to the emissions source, and the amount of emissions generated by the source. Nonetheless, conservatively assuming that the maximum impacted sensitive receptors for each development project are at the same location, this analysis combines the health impacts from the development project at 601 California Drive and the proposed project's cumulative health impacts, as displayed in Table 6. As shown therein, the concurrence of the proposed project and the development project at 601 California Drive would not exceed the BAAQMD significance thresholds for cumulative health impacts. Therefore, the proposed project would not result in any new or more severe cumulative health impacts related to operational emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Table 6: Summary of the Cumulative Health Impacts at the MIR during Construction (Including Development Project at 601 California Drive)

Source	Source Type	Distance from MIR(1) (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration (µg/m^3)
Project					
Construction (with mitigation)	Diesel Construction Equipment	22	3.8	<0.01	0.02
Existing Stationary Sources (BAAQMD Facility Number)(2),(3)					
G5709	Gas Station	164	2.5	0.02	ND
14937	Dry Cleaner	646	0.0	0.0	0.0
14463	Diesel Generator	1052	2.0	0.02	0.01
14474	Diesel Generator	730	3.6	<0.01	0.01
5283	Dry Cleaner	1099	10.5	0.03	0.0
Caltrain/Freight Railroad					
Caltrain/Freight(3)	Diesel Locomotives	344	9.1	<0.01	0.03
Other					
601 California Drive Development Project	Diesel Construction Equipment	80	8.9	<0.01	0.05
Cumulative Health Risks					
Cumulative Total with Project Construction			40.4	0.08	0.1
BAAQMD's Cumulative Thresholds of Significance			**100**	**10**	**0.8**
Threshold Exceedance?			No	No	No

[6] City of Burlingame. 2019. Appendix C: Air Quality Construction Analysis and Health Risk Assessment. Website: https://www.burlingame.org/business_detail_T54_R181.php. Accessed March 24, 2021.

Source	Source Type	Distance from MIR(1) (feet)	Cancer Risk (per million)	Chronic HI	$PM_{2.5}$ Concentration ($\mu g/m^3$)

Notes:
HI = hazard index
$PM_{2.5}$ = particulate matter 2.5 microns or less in diameter
BAAQMD = Bay Area Air Quality Management District
$\mu g/m^3$ = micrograms per cubic meter(1) The maximum impacted sensitive receptor (MIR) is a residence adjacent to project site, 22 feet southwest of the site along Oak Grove Avenue.
(2) Cancer risks reflect the current BAAQMD cancer risk guidance for diesel generators and gasoline stations
(3) Assumes emissions remain constant with time
Sources:
Attachments B and E of the HRA Technical Memorandum contained in Appendix B of the 2018 IS/MND.
City of Burlingame. 2019. Appendix C: Air Quality Construction Analysis and Health Risk Assessment. Website: https://www.burlingame.org/business_detail_T54_R181.php. Accessed March 24, 2021.

Finally, as discussed under Impact (b), the operational CO hotspot impact resulting from project operations would be less than significant. Therefore, the proposed project would not result in any new or more severe CO hotspot impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Project as a Receptor

The proposed project would locate new sensitive receptors (residents) that could be subject to existing sources of TACs at the project site. However, the California Supreme Court in California Building Industry Association v. Bay Area Air Quality Management District concluded that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. Therefore, impacts from existing sources of TAC emissions on sensitive receptors on the project site are not subject to CEQA. For information purposes, in the 2018 IS/MND the City elected to disclose impacts from existing sources of TAC emissions on the future residents. As discussed in the 2018 IS/MND, cumulative health impacts from the existing TAC sources for future on-site residents would not exceed the BAAQMD's cumulative threshold of significance. The proposed project would not change the nature of the on-site receptors, cause existing TAC sources to expose on-site receptors greater than was analyzed in the 2018 IS/MND, or create a greater hazard from any existing TAC sources from the proposed project. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND considered whether the 2018 project would create objectionable odors affecting a substantial number of people. The 2018 IS/MND stated that diesel exhaust and ROG would be emitted during construction of the 2018 project, which are objectionable odors to some; however, emissions would disperse rapidly from the project site and therefore would not create objectionable odors affecting a substantial number of people. As such, construction odor impacts were determined to be less than significant.

The 2018 IS/MND stated that the 2018 project consisted of a new live/work building with space for commercial occupancy. The 2018 project was not a typical source of objectionable

odors; however, the 2018 project would have a residential component and would have the potential to place sensitive receptors near existing or planned sources of odors. The project site is not located within the vicinity of agricultural operations (dairies, feedlots, etc.), landfills, wastewater treatment plants, refineries, and other types of industrial land uses. Furthermore, there are no land uses within the screening distances shown in Table 3-3 of the BAAQMD's guidance that have received five or more confirmed complaints per year for any 3-year period.

As previously discussed, the 2018 project is a live/work development project and is not expected to produce any offensive odors that would result in odor complaints. During operation of the project, odors would primarily consist of vehicle exhaust from passenger vehicles traveling to and from the site. These occurrences would not produce objectionable odors affecting a substantial number of people; therefore, operational impacts were determined to be less than significant in the 2018 IS/MND

As previously stated, construction of the proposed building under the proposed project is not anticipated to result in a greater intensity or duration of construction activities than those analyzed under the 2018 IS/MND. As a result, the proposed project is not anticipated to generate greater amounts of diesel exhaust or ROG emissions than what was analyzed in the 2018 IS/MND to the extent that a significant odor impact would result. Therefore, the proposed project would not result in any new or more severe odor impacts during construction activities beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Much like what was analyzed in the 2018 IS/MND, the proposed project consists of a new live/work building. The proposed project is not a typical source of objectionable odors; however, the proposed project has a residential component and would have the potential to place sensitive receptors near existing or planned sources of odors. The proposed project would not be located any closer to agricultural operations (dairies, feedlots, etc.), landfills, wastewater treatment plants, refineries, and other types of industrial land uses than the project analyzed in the 2018 IS/MND. Furthermore, the proposed project would not site sensitive receptors any closer to land uses provided in Table 3-3 of the BAAQMD's CEQA Air Quality guidance that have received five or more confirmed complaints per year for any 3-year period than the 2018 project. Therefore, no further analysis is required.

The proposed project is a predominantly residential development and is not expected to produce any offensive odors during operation that would result in odor complaints. During operation of the proposed project, odors would primarily consist of vehicle exhaust from passenger vehicles traveling to and from the site. These occurrences would not produce objectionable odors affecting a substantial number of people. Therefore, the proposed project would not result in any new or more severe odor impacts during operation beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

The following mitigation measures from the 2018 IS/MND would apply to the proposed project.

MM AIR-1 During construction activities, the following air pollution control measures shall be implemented:

- Exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All roadways, driveways, and sidewalks shall be paved as soon as possible.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
- A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours of a complaint or issue notification. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.

MM AIR-2 The developer or project applicant shall ensure all off-road construction equipment in excess of 50 horsepower used on-site by the developer or contractors is equipped with engines meeting the EPA Tier IV off-road engine emission standards. The construction contractor shall maintain a log of equipment use at the construction site with make, model, serial number, and certification level of each piece of construction equipment that will be available for review by City building inspection staff.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts in the 2018 IS/MND related to air quality, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the changes to the proposed project. No additional analysis is required.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IV. Biological Resources *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 Game or United States Fish and Wildlife Service?	Less than significant impact after mitigation	No	No	No	MM BIO-1 MM BIO-2
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or United States Fish and Wildlife Service?	No Impact	No	No	No	None
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact	No	No	No	None

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
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 wildlife nursery sites?	Less than significant impact	No	No	No	None
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than significant impact	No	No	No	None
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.	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would have a substantial effect on any species identified as a candidate, sensitive, or special-status species. The 2018 IS/MND indicated that the project site and its adjacent areas contain buildings, ornamental trees and shrubs, including a large stand of eucalyptus (*Eucalyptus* sp.) trees that may provide potential habitat for special-status bird and bat species, as well as non-special-status migratory raptors and passerine bird species protected by the Migratory Bird Treaty Act (MBTA). The MND recommended MM BIO-1 and MM BIO-2 which require pre-construction surveys and protection measures for these species to reduce impacts to a less than significant level.

The proposed changes to the 2018 project would not result in a significant increase to the project footprint, nor change the site that was analyzed in 2018. Therefore, the proposed

project would not introduce new impacts to special status species or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS). The 2018 IS/MND indicated that the project site does not contain riparian habitat or other sensitive natural communities identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.

The proposed changes to the 2018 project would not result in an increase to the project area that was analyzed in 2018. Therefore, the proposed project would not introduce new impacts to riparian habitat or other sensitive natural communities or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether the 2018 project would have a substantial adverse effect on federal protected wetlands. The 2018 IS/MND indicated that the project site does not contain State or federally protected wetlands.

The proposed changes to the 2018 project would not result in an increase to the project area that was analyzed in 2018. Therefore, the proposed project would not introduce new impacts to State or federally protected wetlands or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project would interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The 2018 IS/MND indicated that the 2018 project would not interfere with the movement of migratory fish, migratory wildlife corridors, or the use of wildlife nursery sites. The project site is located in an established residential and commercial neighborhood with multiple barriers to wildlife migration.

The proposed changes to the 2018 project would not result in an increase to the project area that was analyzed in 2018. Therefore, the proposed project would not introduce new impacts to migratory fish, migratory wildlife corridors, or the use of wildlife nursey sites or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND considered whether the 2018 project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The 2018 IS/MND indicated the project site includes four existing street trees (two on California Drive and two Oak Grove Avenue) located in planter strips between the street and sidewalk, one existing tree in the right-of-way along Oak Grove Avenue (between the sidewalk and property line), and one existing tree on private property. The proposed project includes removing and replacing the two existing street trees on California Drive and one existing tree on Oak Grove Avenue and removing the existing tree in the right-of-way along Oak Grove

Avenue and one private property tree. Each of the three street trees that would be removed and replaced will require a Tree Work Permit from the Parks Division prior to removal. The remaining street trees shall be subject to tree protection measures prior to construction in accordance with the City of Burlingame's Municipal Code 11.06.050, which requires protected trees to be protected by a fence during construction. Municipal Code 11.06.050 further prohibits the storage of chemicals or other construction materials within the drip line of protected trees. The Municipal Code Section 11.06 Urban Reforestation and Tree Protection includes measures and conditions that protect trees that are to remain, and requirements for replacement of trees that are removed.

The proposed changes to the 2018 project would not result in an increase to the 2018 project area that was analyzed in 2018. Therefore, the proposed project would not introduce new impacts to local policies or ordinances protecting biological resources, such as a tree preservation ordinance or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

f) The 2018 IS/MND considered whether the 2018 project would conflict with the provisions of an adopted Habitat conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan. The 2018 IS/MND indicated the project site is not located within a Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or State habitat conservation plan.

The proposed changes to the 2018 project would not result in an increase to the project area that was analyzed in 2018. Therefore, the proposed project would not introduce new impacts to a Habitat Conservation Plan, Natural Community Conservation Plan, or other local, regional, or state habitat conservation plan or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

MM BIO-1 Migratory Birds and Nesting Raptors

1. If construction or tree removal is proposed during the breeding/nesting season for local avian species (typically March 1 through August 31), a focused survey for active nests of raptors and migratory birds within and in the vicinity of (no less than 250 feet outside the project boundaries, where possible) the project site shall be conducted by a qualified biologist. One survey will be conducted 30 days prior to tree removal or construction activities. If no active nests are found, tree removal or construction activities may proceed.
2. If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service and/or the California Department of Fish and Wildlife (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted to avoid disturbance of the nest until it is abandoned or the biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones or alteration of the construction schedule.

MM BIO-2 Special-status Bat Species

1. To reduce construction related impacts to special-status bat species, a bat survey shall be conducted between March 1 to July 31 by a qualified wildlife biologist within the year of proposed construction start and prior to ground disturbance. If no bat roosts are detected, then no further action is required. If a colony of bats is found roosting on-site, then the following mitigation will be implemented to reduce the potential disturbance:
2. If a female or maternity colony of bats are found on the project site, a wildlife biologist through coordination with CDFW shall determine what physical and timed buffer zones shall be employed to ensure the continued success of the colony. Such buffer zones may include a construction-free barrier of 200 feet from the roost and/or the timing of the construction activities outside the maternity roost season (after July 31 and before March 1).

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to biological resources, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
V. Cultural and Tribal Cultural Resources *Would the project:*					
a) Cause a substantial adverse change in the significance of a historical resource as pursuant to Section 15064.5?	Less than significant impact with mitigation incorporated	No	No	No	MM CUL-1
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	Less than significant impact with mitigation incorporated	No	No	No	MM CUL-1
c) Disturb any human remains, including those interred outside of formal cemeteries?	Less than significant impact with mitigation incorporated	No	No	No	MM CUL-3
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:					
d) 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	Less than significant	No	No	No	None
e) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in	Less than significant	No	No	No	None

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
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.					

Discussion

Cultural Resources

a),b) The 2018 IS/MND evaluated whether the 2018 project would cause a substantial adverse change in the significance of a historical resource or an archaeological as defined in CEQA Guidelines Section 15064.5. The 2018 IS/MND concluded that the results of the Northwest Information Center (NWIC) records search show that 37 cultural resources lie within 0.5 mile of the project site, all of which are historic buildings or structures located off of the project area. Of these buildings and structures, none are associated with prehistorical archaeological resources. The developed nature of the project site makes the likelihood of encountering intact prehistoric resources low. Because subsurface construction activities always have the potential to damage or destroy previously undiscovered historical resources or archaeological resources, implementation of MM CUL-1 was recommended. Impacts were determined to be less than significant with mitigation incorporated.

The proposed project has the same project area and a similar building footprint as the 2018 project. An updated NWIC record search for the proposed project yielded similar results regarding structures located within 0.5 mile of the project area (Appendix D), and no new resources were found that could potentially be affected by the construction of the revised project. MM CUL-1 is still recommended to prevent construction activities from damaging or destroying previously undiscovered historical resources. Therefore, the proposed project would not introduce new impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether the 2018 project would disturb any human remains, including those interred outside of formal cemeteries. The 2018 IS/MND concluded that no human remains or cemeteries are known to exist within or near the project area, but that there is always the possibility that subsurface construction activities could potentially damage or destroy previously undiscovered human remains. As such, MM CUL-3 was recommended. Impacts were determined to be less than significant with mitigation incorporated.

The proposed project has the same project area and a similar building footprint to the 2018 project. As such, it is still the case that no human remains or cemeteries are known to exist within or near the project area, but there is still a possibility that subsurface construction activities could damage previously undiscovered human remains. As a result, the same mitigation measure (called MM CUL-2 in this document) is still recommended to prevent construction activities from damaging or destroying previously undiscovered human remains. Therefore, the proposed project would not introduce new impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Tribal Cultural Resources

d) The 2018 IS/MND evaluated whether the 2018 project would cause a substantial adverse change in the significance of a Tribal Cultural Resource (TCR) that is 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). The 2018 IS/MND concluded that a records search conducted at the NWIC and a sacred lands file search conducted at the Native American Heritage Commission (NAHC) failed to identify any listed TCRs that may be adversely affected by the 2018 project. It was determined that impacts would be less than significant.

The proposed project has the same project area and a similar building footprint as the 2018 project. An updated NWIC records search as well as an updated NAHC sacred lands file search was conducted for the proposed project. These searches produced the same results as the 2018 project. Therefore, the proposed project would not introduce new impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND evaluated whether the 2018 project would cause a substantial adverse change in the significance of a tribal cultural resources that is a resource determined by a lead agency, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. The 2018 IS/MND concluded that no TCRs would be adversely affected by the 2018 project. FCS conducted tribal outreach with the five tribal representatives identified by the NAHC, none of which identified any TCRs associated with the property. The City did not identify any TCRs. It was determined that impacts would be less than significant.

The proposed project has the same project area and a similar building footprint to the 2018 project. FCS conducted tribal outreach with the eight tribal representatives identified by the NAHC, none of which identified any TCRs associated with the project area. The City did not identify any TCRs associated with the project area. Therefore, the proposed project would not introduce new impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

MM CUL-1 In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an

Archaeologist who meets the Secretary of Interior's Professional Qualification Standards for archaeology has evaluated the resource. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The resource shall be recorded on appropriate Department of Parks and Recreation (DPR) forms and evaluated for significance in terms of CEQA criteria by the qualified Archaeologist. If the resource is determined significant under CEQA, the qualified Archaeologist shall prepare and implement a research design and archaeological data recovery plan that will capture those categories of data for which the site is significant in accordance with Section 15064.5 of the CEQA Guidelines. The Archaeologist shall also perform appropriate technical analyses, prepare a comprehensive report complete with methods, results, and recommendations, and provide for the permanent curation of the recovered resources. The report shall be submitted to the City of Burlingame, the Northwest Information Center, and the California Office of Historic Preservation (OHP), as required.

MM CUL-2 In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified Paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The Paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The Paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the Applicant determines that avoidance is not feasible, the Paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Burlingame for review and approval prior to implementation, and the Applicant shall adhere to the recommendations in the plan.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to cultural resources, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VI. Energy *Would the project:*					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	This checklist question did not exist at the time the 2018 IS/MND was approved.	No	No	No	None
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	This checklist question did not exist at the time the 2018 IS/MND was approved.	No	No	No	None

Discussion

a-b) The 2018 IS/MND did not directly analyze the energy consumption resulting for the 2018 project; however, the 2018 IS/MND analyzed general energy efficiency of the project in Section 7, Greenhouse Gas Emissions, of the 2018 IS/MND. As discussed therein, the 2018 IS/MND determined that the 2018 project would meet the requirements of the 2016 California Building Code, including the applicable regulatory standards for energy efficiency, sustainable development, and the enhancement of environmental quality. For example, as part of the 2016 California Green Building Code Checklist for Nonresidential Buildings, the 2018 project provided both short- and long-term bicycle parking for residents and visitors. In operation, the 2018 project also aimed to meet all applicable Green Building Measures outlined in the checklists. The 2018 IS/MND ultimately determined that the 2018 project would be consistent with the City's Climate Action Plan, which largely encompasses energy efficiency measures through the reduction of fossil fuel consumption such as promoting infill development, alternative modes of transportation, and higher density development.

As discussed under Section VI, Greenhouse Gas Emissions, the proposed project would remain consistent with the City's Climate Action Plan by promoting infill development, alternative modes of transportation, and higher density development. Furthermore, the proposed project would be required to adhere to requirements of at least the 2016 California Building Code,

including the applicable regulatory standards for energy efficiency, sustainable development, and the enhancement of environmental quality such as providing bicycle parking for residents and visitors.

As previously discussed, the proposed project would result in the reduction of 2,100 square feet of commercial space and the addition of 18 residential units from what was analyzed in the 2018 IS/MND. The changes in the proposed project from what was analyzed in the 2018 IS/MND would result in an overall increase in natural gas and electricity consumption; however, compliance with the applicable California Building Code standards would ensure that the proposed project would not result in wasteful, unnecessary, or inefficient consumption of energy to the extent practicable. In addition, as discussed in the TIA prepared for the proposed project,[7] the proposed project would result in an estimated 195 net daily vehicle trips after accounting for the foregone vehicle trips generated by existing land uses. As the 2018 IS/MND estimated the previously analyzed project to generate 123 net daily vehicle trips, the proposed project would result in 72 net daily vehicle trips during operation beyond what was analyzed in the 2018 IS/MND, principally due to the addition of 18 residential units. The increase of 72 daily vehicle trips would result in an overall increase in fossil fuel consumption; however, the proposed project would remain less than 0.5 mile from Burlingame Station and several bus stops, which would provide future residents and visitors with easy access to alternative transportation options. Therefore, although there would be an increase in natural gas, electricity, and fossil fuel consumption, the proposed project would not result in more severe energy impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts in the 2018 IS/MND related to energy, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the changes to the proposed project. No additional analysis is required.

[7] Hexagon Transportation Consultants, Inc. 2021. 619-625 California Drive Live/Work Development Draft Traffic Impact Analysis. March 12.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VII. Geology, Seismicity, and Soils *Would the project:*					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Less than significant impact	No	No	No	None
ii) Strong seismic ground shaking?	Less than significant impact with mitigation incorporated	No	No	No	MM GEO-1
iii) Seismic-related ground failure, including liquefaction?	Less than significant impact with mitigation incorporated	No	No	No	MM GEO-2 MM GEO-3 MM GEO-4
iv) Landslides?	No impact	No	No	No	None
b) Result in substantial soil erosion or the loss of topsoil?	Less than significant impact	No	No	No	None
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than significant impact with mitigation incorporated	No	No	No	MM GEO-1 MM GEO-2 MM GEO-3 MM GEO-4

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
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 impact	No	No	No	None
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No impact	No	No	No	None
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than significant impact with mitigation incorporated	No	No	No	MM GEO-5

Discussion

a) i) The 2018 IS/MND considered whether the 2018 project would expose people or structures to potential substantial adverse effects, involving the rupture of a known earthquake fault. The 2018 IS/MND concluded that the project site is not located within an Alquist-Priolo Earthquake Zone or near a potentially active fault. The closest fault to the project site is the San Andreas Fault, approximately 2.7 miles away. While the project site is likely to experience severe ground shaking in the case of a moderate to large earthquake, the project would be required to comply with the California Building Code as well as the City's Building Code (Title 18). It was determined that impacts would be less than significant.

The proposed project site would have the same location and its building footprint would be about the same as the 2018 project. The proposed project would still be required to comply with the California Building Code and Title 18. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

ii) The 2018 IS/MND analyzed whether the 2018 project would expose people or structures to potential substantial adverse effects involving strong seismic ground shaking. The 2018 IS/MND concluded that the 2018 project would be expected to experience moderate to large earthquakes several times during its design life. However, this is the case with much of the San

Francisco Bay Area and the proposed project would have to conform to engineering recommendations in accordance with the seismic requirements of Zone 4 of Uniform Building Code (UBC), California Title 24 additions, 2016 California Building Code and ASCE 7-10 seismic design provisions, and Burlingame Municipal Code regulations to ensure performance of a building during an earthquake. MM GEO-1 requires that the project applicant retain a qualified geotechnical consulting firm to review final engineering plans and monitor during the earthwork and foundation phases on construction. It was determined that impacts would be less than significant with mitigation incorporated.

The proposed project would have the same location and similar building footprint to what was originally proposed. The proposed project would be subject to all of the same regulations and mitigation measures as what was originally proposed. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

iii) The 2018 IS/MND considered whether the 2018 project would expose people or structures to potential substantial adverse effects involving seismic-related ground failure, including liquefaction. The 2018 IS/MND concluded that, per the interactive United States Geological Survey (USGS) Susceptibility Map of the San Francisco Bay Area, the subject site is located within an area identified as having a moderate susceptibility to liquefaction. A Geotechnical Investigation of the project site indicated that a total settlement of 0.6 to 1.1 inches is estimated to occur within the sand strata at the site due to severe ground shaking cause by a major earthquake. However, MM GEO-2, MM GEO-3, and MM GEO-4, as well as adherence to the UBC and California Building Code, would reduce these risks. Impacts were determined to be less than significant with mitigation incorporated.

The proposed project would have the same location and similar building footprint as what was originally proposed. The proposed project would be subject to all of the same regulations and mitigation measures as what was originally proposed. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

iv) The 2018 IS/MND evaluated whether the 2018 project would expose people or structures to substantial adverse effects involving landslides. The 2018 IS/MND concluded that the City has reasonably stable soils and that the project site is relatively flat and not adjacent to a hillside. It was determined that the project site would not be susceptible to landslides and no impact would occur.

The proposed project would be located at the same project site, which is relatively flat and has stable soils. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would result in substantial erosion or the loss of topsoil. The 2018 IS/MND concluded that, per Municipal Code Sections 18.20.060

and 18.20.080, runoff from the project site during grading would be evaluated for its potential to cause erosion and the City Engineer or building official would inspect the project site after rough grading to ensure compliance with the grading permit. Further, because development of the 2018 project would have removed or replaced more than 10,000 square feet of impervious surfaces, the proposed project is required to meet Provisions C.3 and C.6 of the Municipal Regional Stormwater Permit (MRP), Order No. RI-2009-0074 and Order No.R2-2011-0083, National Pollutant Discharge Elimination System (NPDES) No. CAS612008, which are detailed in MM HYD-1 and MM HYD-2 in Section X. Impacts were determined to be less than significant.

The proposed project would have the same location and similar building footprint as what was originally proposed by the 2018 project. The proposed project would be subject to all of the same regulations as what was originally proposed. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND evaluated whether the 2018 project would be located on expansive soil. The 2018 IS/MND concluded that the surface and near surface soils at the site have generally low plasticity and a low potential for expansion, per the Geotechnical Investigation. It was determined that no impact would occur and no mitigation measures were required.

The proposed project would be located at the same project site, which has soils with low plasticity and low potential for expansion. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project would be built on soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. The 2018 IS/MND determined that the 2018 project would not include septic or alternative wastewater systems. It was determined that no impact would occur, and no mitigation measures were required.

The proposed project would not include septic or alternative wastewater systems. Sewer and wastewater disposal services would be provided by the City of Burlingame. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND considered whether the 2018 project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The 2018 IS/MND concluded that the potential for the 2018 project to have an adverse effect on paleontological resources was considered low. However, paleontological resources could be discovered during project construction and that MM CUL-2 was required. It was determined that impacts would be less than significant with mitigation incorporated.

The proposed project would be located on the same project site and have a similar building footprint as what was originally proposed in the 2018 project. MM CUL-2 from the 2018

IS/MND would be re-labeled to match the new checklist question location and implemented as MM GEO-5 in this document. Therefore, the proposed project would not result in any new or more severe impacts beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

MM GEO-1 Prior to the issuance of a building permit and during the foundation phases of construction, the project applicant shall follow the recommendations of the Geotechnical Investigation, by retaining a qualified geotechnical consulting firm. Subsurface conditions may vary from those encountered at the locations of borings during the Geotechnical Investigation. The geotechnical firm retained by the project applicant shall review final engineer plans as well as observe and test during the earthwork and foundation phases of construction. This would ensure recommendations from the Geotechnical Investigation are properly incorporated into the project plan and development.

MM GEO-2 Prior to the issuance of a building permit, the project's plans shall reflect foundations that extend deep enough to penetrate more stable soils. The project applicant shall follow the recommendations of the Geotechnical Investigation, by ensuring the building be supported on conventional spread footing foundation system bearing on stiff native soils or properly compacted structural fill. All continuous footings shall have a width of at least 15 inches and shall extend at least 30 inches below exterior grade or at least 24 inches below the bottom of concrete. slabs-on-grade, whichever is deeper. Footings located adjacent to utility lines shall bear below a 1:1 plane extending up from the bottom edge of the utility trench. Continuous foundations shall be designed with sufficient depth and reinforcing to tolerate the estimated differential settlement. The geotechnical consulting firm retained by the applicant shall observe all footing excavations prior to the placement of reinforcing steel to confirm that suitable material has been exposed and properly cleaned. If soft or loose soil is encountered in the foundation excavations, the geotechnical consulting firm may require overexcavation and/or compactive effort or a deeper footing depth below the reinforcing steel is placed. Alternative to the spread footing foundation described above, the building may be supported on a reinforced concrete mat foundation bearing on a properly prepared and compacted soil subgrade. The mat foundation shall have a thickened perimeter edge that extends at least eight inches into the soil subgrade below the bottom of the mat or at least four inches below the base of the capillary break rock section. This should improve edge stiffness, reduce the potential for map slab dampness, and increase resistance to lateral loads imposed on the mat. The mat foundation shall be reinforced to provide structural continuity and to permit spanning of local irregularities. It shall be designed with sufficient depth and reinforcing to be able to tolerate the estimated differential settlements. Prior to mat construction, the subgrade shall be proof-rolled to provide a smooth firm surface for mat support.

Where dampness of the mat would be undesirable, a high quality membrane vapor barrier shall be installed.

MM GEO-3 Prior to the issuance of a building permit, the structural engineer shall consult with the membrane manufacturer for the coefficient of friction to be assumed for design. Lateral loads may be resisted by base friction between the vapor barrier or damp proofing membrane shown below the mat and the supporting subgrade and by passive soil pressure acting against the sides of the mat foundations. Lateral resistance may be provided by passive soil pressure acting against the sides of foundations cast neat in footing excavations or backfilled with compacted structural fill. The upper foot of passive soil shall not be neglected where soil adjacent to the footing or mat will be landscaped or subject to softening from rainfall and/or surface runoff.

MM GEO-4 Prior to the issuance of a building permit, the building foundations shall be designed as recommended by the Geotechnical Investigation. The 30-year post-construction differential settlement due to static loads is not expected to exceed 1 inch across the proposed building. Less differential movement would be expected across a structural mat foundation. Additional differential settlement may occur as a result of liquefaction and dynamic densification caused by severe ground shaking during a major earthquake.

MM GEO-5 In the event that fossils or fossil-bearing deposits are discovered during construction activities, excavations within a 100-foot radius of the find shall be temporarily halted or diverted. The project contractor shall notify a qualified Paleontologist to examine the discovery. The applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. The Paleontologist shall document the discovery as needed in accordance with Society of Vertebrate Paleontology standards and assess the significance of the find under the criteria set forth in CEQA Guidelines Section 15064.5. The Paleontologist shall notify the appropriate agencies to determine procedures that would be followed before construction activities are allowed to resume at the location of the find. If the applicant determines that avoidance is not feasible, the Paleontologist shall prepare an excavation plan for mitigating the effect of construction activities on the discovery. The plan shall be submitted to the City of Burlingame for review and approval prior to implementation, and the applicant shall adhere to the recommendations in the plan.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts in the 2018 IS/MND related to geology, seismicity, and soils, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the changes to the proposed project. No additional analysis is required.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
VIII. Greenhouse Gas Emissions *Would the project:*					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than significant impact	No	No	No	None
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than significant impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would generate greenhouse gas emissions, either director or indirectly, that may have a significant impact on the environment. The 2018 IS/MND stated that the 2018 project would emit GHG emissions during construction from off-road equipment operation, worker vehicle trips, and any hauling that may occur. The BAAQMD does not presently provide a construction-related GHG significance threshold but recommends that construction-generated GHGs be quantified and disclosed. The BAAQMD also recommends that lead agencies (in this case, the City of Burlingame) determine the level of significance of construction GHG emissions in relation to meeting Assembly Bill 32 (AB 32) GHG reduction goals. As discussed in the 2018 IS/MND, construction of the 2018 project was estimated to generate approximately 211 metric tons carbon dioxide equivalent (MT CO_2e) over the entire project construction duration. To account for the construction emissions, the total emissions generated during construction were amortized based on the life of the development (30 years) and added to the operational emissions to determine the total emissions of the 2018 project. These total project emissions were compared to the BAAQMD significance threshold standard.

The 2018 IS/MND stated that the 2018 project would generate GHG emissions from the operation of motor vehicles traveling to and from the project site, the consumption of natural gas for water and space heating, the consumption of electricity for operational power needs and water transport, and the decomposition of waste generated by the 2018 project. As demonstrated in the 2018 IS/MND, the 2018 project's long-term operational GHG emissions

were determined to not exceed the BAAQMD's threshold of significance and result in a less than significant impact.

As previously discussed under Section III, Air Quality, construction of the proposed building under the proposed project is not anticipated to result in a greater intensity or duration of construction activities than those analyzed under the 2018 IS/MND. As a result, the proposed project is not anticipated to generate greater amounts of GHG emissions than what was analyzed in the 2018 IS/MND. As a result, the proposed project's construction GHG emissions are anticipated to be the same as those analyzed in the 2018 IS/MND. Therefore, the proposed project would not result in any new or more severe impacts related to construction GHG emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

As previously discussed under Section III, Air Quality, the proposed project would result in an overall increase in land use development when compared to the 2018 IS/MND. Most notably, the proposed project would result in the construction and operation of 18 more residential units than was analyzed in the 2018 IS/MND. Because the majority of operational GHG emissions in the 2018 IS/MND would be generated from energy sources and the operation of motorized vehicles, which are considerably influenced by the number of proposed residential units, operational GHG emissions generated from the proposed project were remodeled and displayed herein.

Operation of the proposed project was modeled using the California Emissions Estimator Model (CalEEMod), Version 2016.3.2. The modeling results shown in Table 7 represent updates to the proposed project from the 2018 IS/MND, including the addition of 18 residential units, the increase in residential building square footage, the increase in ground-level parking garage space, the increase in daily vehicle trips, and the removal of commercial space. In addition, in accordance with the BAAQMD CEQA Air Quality Guidelines, only non-biogenic GHG emissions are included in this analysis. For informational purposes, the biogenic GHG emissions generated by the proposed project would total approximately 5 MT CO_2e per year collectively from waste and water sources. Modeling outputs are contained in Appendix C.

Table 7: Operational Greenhouse Gas Emissions

Emission Source	Project Total MT CO_2e per year
Area	1
Energy	73
Mobile (Vehicles)	158
Waste	6
Water	8
Total Project Operational Emissions	**246**
Annualized Construction Emissions	*7*

Emission Source	Project Total MT CO_2e per year
Total Project Emissions	**253**
BAAQMD Threshold	**1,100**
Does project exceed threshold?	**No**

Notes:
BAAQMD = Bay Area Air Quality Management District
MT CO_2e = metric tons of carbon dioxide equivalent.
Unrounded results used to calculate totals.
Source of Emissions:
2018 IS/MND; CalEEMod Output (Appendix C)

As shown in Table 7, the proposed project's operational GHG emissions would not exceed BAAQMD significance thresholds. It should also be noted that the GHG emission estimates shown herein do not incorporate reductions from the foregone emissions generated by existing land uses. Therefore, the emissions estimates presented in this analysis represent a conservative assessment of emissions generated by the proposed project. Therefore, the proposed project would not result in any new or more severe impacts related to operational GHG emissions beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. The 2018 IS/MND stated that the program and policy recommendations contained in the City's Climate Action Plan were reviewed to determine if development of the 2018 project would conflict with any of the recommendations. The 2018 project would create a new live/work building with space for commercial occupancy and would be consistent with the Climate Action Plan recommendation to encourage development that is mixed-use, infill, and higher density. The 2018 IS/MND further identified that the 2018 project would include bicycle parking for both residents and visitors and would provide a safe and convenient option for bicycle transportation in the area. In addition, the 2018 project proposed improvements to the sidewalks fronting the project site that would provide safe walkways for pedestrians, further promoting the goals and recommendations provided in the City's Climate Action Plan. An existing bus stop bench along California Drive would remain in front of the project building for use, and the project site is located less than 0.5 mile from Burlingame Station, the closest train station, providing future residents access to public transit options.

The 2018 IS/MND determined that the 2018 project would be consistent with the City's Climate Action Plan and General Plan Update and would not conflict with the provisions of AB 32, the applicable air quality plan, or any other State or regional plan, policy or regulation of an agency adopted for the purpose of reducing GHG emissions. As such, impacts were determined to be less than significant.

As previously discussed under Section III, Air Quality, the proposed project would result in the addition of 18 live/work residential units beyond what was analyzed in the 2018 IS/MND. The introduction of 18 additional live/work residential units would increase the proposed density of the development. In addition, the proposed project would continue to implement the pedestrian improvements analyzed in the 2018 IS/MND, introduce infill residential development near existing public transit options, and constitute a mixed-use development with the live/work nature of the proposed project. Therefore, the proposed project would not result in any new or more severe impacts related to consistency with locally adopted GHG reduction plans beyond what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts in the 2018 IS/MND related to GHG emissions, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the changes to the proposed project. No additional analysis is required.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
IX. Hazards and Hazardous Materials *Would the project:*					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than significant impact	No	No	No	None
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 impact	No	No	No	None
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Less than significant impact	No	No	No	None
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less than significant impact	No	No	No	None
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport	No impact	No	No	No	None

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
or public use airport, would the project 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?	No impact	No	No	No	None
g) Expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires?	No impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. The 2018 IS/MND found that the 2018 project would not involve routine transport, use, or disposal of hazardous materials. While residents and commercial activities would likely store and use small quantities of household hazardous chemicals or wastes which would not be considered significant, this would be considered *de minimis* and impacts were determined to be less than significant.

The proposed changes to the 2018 project would not include the routine transport, use, or disposal of hazardous materials. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would 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. The 2018 IS/MND concluded that the existing structures on the project site may contain lead-based paint and/or asbestos, which poses a health risk to the nearest residents and construction workers during

the demolition process, but that compliance with applicable rules and regulations would result in a less than significant impact from the proposed project related to accidental release of hazards into the environment and exposure of construction workers.

It was observed in the Phase I Environmental Site Assessment (Phase I ESA) for Assessor's Parcel Number (APN) 029-131-160 that hazardous substances and petroleum products were being stored on-site and that minor oily surface staining occurred in various spots of the southern portion of the property. The staining is not expected to represent a significant environmental concern, but it was recommended that the materials be stored in a second containment. The Phase I ESA did not identify any sources of contamination and therefore, impacts were determined to be less than significant.

Numerous containers of motor oil, antifreeze, and motor oil filters were observed in the Phase I ESA for APN 029-131-150. Although minor staining from automobile operations was observed around the site, nothing indicated that the subsurface of the property was impacted. While the site was listed as a San Mateo Certified Unified Program agencies, Delisted County, Facility Index System/Facility Registry Service, and Resource Conservation and Recovery Act Generator List site, no violations or release incidents were reported, and it was determined that this part of the project site was not expected to represent a significant environmental concern.

The proposed changes to the 2018 project would not substantially alter the project footprint analyzed in the 2018 IS/MND and the same existing conditions apply. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether the 2018 project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school. The 2018 IS/MND concluded that, while Burlingame High School is located within 0.25 mile of the project site, the proposed project is residential and would not involve the transport, use, storage, or disposal of reportable quantities of hazardous materials and that regulations would ensure that existing building materials are properly disposed of during demolition. Impacts were determined to be less than significant.

The proposed changes to the 2018 project would not involve the transport, use, storage, or disposal of reportable quantities of hazardous materials. The proposed project would still comply with existing hazardous materials regulations to ensure building materials are properly disposed of during demolition. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project would be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. The 2018 IS/MND concluded that the 2018 project is not included in a California Department of Toxic Substances Control (DTSC) Hazardous Waste and Substances Site List (Cortese List) and that the closest listed site is California Department of Transportation

(Caltrans)/SSF Maintenance Station in South San Francisco, which is located approximately 5.5 miles north of the project site. According to the regulatory database, the Burlingame Prime Motorz/On Track Automotive, which is currently located on the project site, is listed as a San Mateo Certified Unified Program Agency (CUPA), Delisted County, FINDS/FRS, and CRA GEN site because of the handling of hazardous substances and the generation of hazardous wastes on-site. However, no violations or release incidents were reported for the site and the site is not expected to represent a significant environmental concern. Impacts were determined to be less than significant.

The proposed changes to the 2018 project would not alter the project site boundaries or substantially alter the building footprint. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND considered whether the 2018 project would result in a safety hazard for people residing in or working in the project area as a result of it being located within an airport land use plan or within two miles of a public airport or public use airport. The 2018 IS/MND concluded that the San Francisco International Airport (SFO) is located approximately 2.11 miles north of the project site and the San Mateo Comprehensive Airport Land Use Plan does not designate the project site as an area located within a restricted height zone. It was determined that no impact would occur.

The project site would remain in the same location, over 2 miles from SFO and not in an area located within a restricted height zone as determined by the San Mateo Comprehensive Airport Land Use Plan. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

f) The 2018 IS/MND considered whether the 2018 project would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The 2018 IS/MND concluded that the 2018 project's access routes would remain consistent with those already in existence in the vicinity of the project site and that construction of the project would not obstruct surrounding roadways. It was determined that no impact would occur.

Upon implementation of the proposed changes to the proposed project, access to the project site would still be provided via a driveway on Oak Grove Avenue. The driveway would be 18 feet in width, in compliance with City standards. However, emergency vehicle access would be available on California Drive and Oak Grove Avenue, separate from the project driveway. The proposed project's access routes would remain consistent with the requirements of the City of Burlingame. Construction of the proposed project would not obstruct surrounding roadways and access routes. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

g) The 2018 IS/MND considered whether the 2018 project would expose people or structures to a significant risk of loss, injury or death involving wildland fires. The 2018 IS/MND concluded that there are no wildlands on or surrounding the project site and the site has an extensive history of development. The surrounding area is also developed. It was determined that no impact would occur.

Section XIX of this addendum (Wildfire) contains more information about impacts related to wildfires. However, the project site would remain the same and therefore, the proposed project would remain in a developed area with no wildlands nearby. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts in the 2018 IS/MND related to Hazards and Hazardous materials emissions, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the changes to the proposed project. No additional analysis is required.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
X. Hydrology and Water Quality *Would the project:*					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than significant with mitigation incorporated	No	No	No	MM HYD-1 MM HYD-2
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No impact	No	No	No	None
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:					
(i) result in substantial erosion or siltation on- or off-site;	Less than significant impact	No	No	No	None
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than significant impact	No	No	No	None
(iii) create or contribute runoff water which would exceed the capacity of existing	Less than significant impact	No	No	No	None

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or					
(iv) impede or redirect flood flows?	No impact	No	No	No	None
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No impact	No	No	No	None
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	None	No	No	No	None

Discussion

a) The 2018 IS/MND evaluated whether the 2018 project would violate any water quality standards or waste discharge requirements. The 2018 IS/MND concluded that while the population increase caused by the project would increase future concentrations of contaminants such as gasoline, motor oil, and antifreeze into the San Francisco Bay, the population growth is planned, and the development would have to be compliant with the City of Burlingame Municipal Code. Because the 2018 project would have disturbed more than 10,000 square feet of impervious surfaces, the 2018 project would have been required to employ MM HYD-1 and MM HYD-2 and BMPs per Provisions C.2 and C.6 of the MRP, Order No. R2-2009-0074 and Order No. R2-1022-0083, and NPDES No. CAS612008. Impacts were determined to be less than significant with mitigation incorporated.

As described in Section XIV. Population and Housing, the proposed project is expected to increase the City's population by 106 people, 51 more than the 2018 project. While this could potentially lead to more gasoline, motor oil, and antifreeze runoff into the San Francisco Bay than what was originally proposed in the 2018 project, the increase in population would still be considered planned growth for the City. The proposed project would still have to meet

requirements related to stormwater, grading, erosion, and runoff as outlined by Municipal Code Sections 26.16.090, 18.20.030, 18.20.060, and 18.20,080.

The existing impervious area of the project site is 17,351 square feet. Similar to the 2018 project, the proposed project would decrease the impervious area to 14,196 square feet, a reduction of 3,155 square feet. The proposed project would still disturb more than 10,000 square feet of impervious surfaces and therefore, would be required to implement MM HYD-1, MM HYD-2, and associated BMPs. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or lowering of the local groundwater table level. The 2018 IS/MND concluded that the San Francisco Public Utilities Commission (SFPUC) supplies water to the City of Burlingame and uses primarily surface water from the Hetch Hetchy Reservoir. No groundwater supplies would be required to serve the 2018 project. It was determined that no impact would occur, and no mitigation measures were required.

The proposed project would still get its water supply from the SFPUC and would not utilize any groundwater supplies. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

c) (i)-(iv) The 2018 IS/MND evaluated whether the 2018 project would substantially alter the existing drainage pattern in the area, in a manner that would result in substantial erosion or siltation on-site or off-site, increase the rate or amount of surface runoff resulting in flooding, contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, provide substantial additional sources of polluted runoff, or impede existing flood flows. The 2018 IS/MND concluded that the 2018 project would not substantially change the extent of impervious surfaces and would not significantly change the volume of stormwater runoff. The 2018 project would have installed pervious surfaces to reduce runoff impacts. Impacts were determined to be less than significant.

As stated above, both the 2018 project and the currently proposed project would implement MM HYD -1 and HYD-2, controlling or treating any additional runoff from disturbing or adding impervious surfaces. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project would result in inundation by seiche, tsunami, or mudflow. The 2018 IS/MND concluded that the 2018 project would not be exposed to mudslide, tsunami, or seiche risks because the project site is relatively flat, is not located near any inland bodies of water, and is located more than 0.75 mile from the San Francisco Bay. It was determined that no impact would occur.

The proposed project site would have the same area and similar building footprint to what was originally proposed in the 2018 project. Therefore, the proposed project would not result in any new or more severe impacts than what was previously analyzed in the 2018 IS/MND. No additional analysis is required.

e) This question was not analyzed in the 2018 IS/MND. The City of Burlingame does not have a water quality control plan or a sustainable groundwater management plan. As described above, the proposed project would have a less than significant impact on water quality and would have no impact on groundwater supplies. Therefore, impacts would be less than significant.

Mitigation Measures

MM HYD-1 **MM HYD-1** The project applicant shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities at the project site. At a minimum, the SWPPP shall include the following:

- A construction schedule that restricts use of heavy equipment for excavation and grading activities to periods where no rain is forecasted during the wet season (October 1 thru April 30) to reduce erosion associated intense rainfall and surface runoff. The construction schedule shall indicate a timeline for earthmoving activities and stabilization of disturbed soils;
- Soil stabilization techniques such as covering stockpiles, hydroseeding, or short-term biodegradable erosion control blankets;
- Silt fences, compost berms, wattles or some kind of sediment control measures at downstream storm drain inlets;
- Good site management practices to address proper management of construction materials and activities such as but not limited to cement, petroleum products, hazardous materials, litter/rubbish, and soil stockpile; and
- The post-construction inspection of all drainage facilities and clearing of drainage structures of debris and sediment.

MM HYD-2 Prior to project approval, the project applicant shall prepare the appropriate documents consistent with San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) and NPDES Provisions C.3 and C.6 requirements for post-construction treatment and control of stormwater runoff from the site. Post-construction treatment measures must be designed, installed, and hydraulically sized to treat a specified amount of runoff. Furthermore, the project plan submittals shall identify the owner and maintenance party responsible for the ongoing inspection and maintenance of the post-construction stormwater treatment measure in perpetuity. A maintenance agreement or other maintenance assurance must be submitted and approved by the City prior to the issuance of a final construction inspection.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to hydrology and water quality, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XI. Land Use and Planning *Would the project:*					
a) Physically divide an established community?	No impact	No	No	No	None
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?	No impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would physically divide an established community. The 2018 IS/MND concluded that the project site is surrounded by an established urban area and that the 2018 project would be consistent with the General Plan and zoning designations. Therefore, it was determined that no impact would occur.

The project site continues to be surrounded by an established urban area. The proposed changes to the 2018 project would be consistent with the existing general plan and zoning designations. The proposed changes to the 2018 project would not alter the project height, nor would they change the 2018 project siting or involve other features that would divide the community. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the 2018 project would conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The 2018 IS/MND concluded that the 2018 project would be consistent with all policies of the Burlingame Municipal Code and the Burlingame Downtown Specific Plan. The 2018 IS/MND determined that no impact would occur.

The Burlingame Municipal Code zones the site under the C-2, North California Drive Commercial District. The proposed changes to the 2018 project would be compliant with the Code's Section 25.31.060, which permits live/work units above the first floor only. The first floor would contain an entrance lobby, manager's office, and co-working space. It would not contain live/work units. The allowable FAR for the zone is 3.0 and the proposed project would have an FAR of 2.99. The building would remain under the 55-foot height limit set by the Municipal Code.

The Burlingame Downtown Specific Plan allows live/work units in the North California Drive Commercial District, where the proposed project is located. The proposed project would contain 44 live/work units. It would remain consistent with Specific Plan goals, LU-3, LU-6, and D-4, which are meant to ensure a pedestrian-friendly downtown, establish sensitive transitions between existing residential area and the downtown area, and promote diversity in housing type and affordability within the Downtown area. Because the proposed changes to the 2018 project would remain consistent with the Burlingame Municipal Code and the Burlingame Downtown Specific Plan, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to land use and planning, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XII. Mineral Resources *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?	No impact	No	No	No	None
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	No	No	No	None

Discussion

a)-b) The 2018 IS/MND considered potential impacts of the 2018 project on mineral resources. The 2018 IS/MND concluded that, according to the Mineral Resources Map of the San Mateo County General Plan, there are no known mineral resources located within the project site or the project site's vicinity. No mineral extraction activities exist on the project site and mineral extraction is not included within the 2018 project's design. It was determined that no impact would occur.

The project site is within the Burlingame Downtown Specific Plan General Plan designation, in the North California Drive Commercial District, which does not contain mineral extraction uses. The proposed changes to the 2018 project would not alter the project siting and the same land uses and designations apply. Therefore, the proposed project would not introduce impacts to mineral resources or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to mineral resources, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIII. Noise *Would the project:*					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than significant impact	No	No	No	None
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than significant impact	No	No	No	None
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the 2018 project would result in a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project.

The analysis determined that both mobile and stationary source construction noise impacts would be less than significant by restricting construction activities to the City's permissible time periods and by implementing the best management noise reduction techniques and practices outlined in MM J-1 of the Downtown Specific Plan MND. Therefore, the impact was determined to be less than significant with implementation of MM J-1.

The 2018 IS/MND also analyzed traffic noise impacts. The analysis determined that the highest traffic noise level increase with implementation of the 2018 project would occur along Oak Grove Avenue south of California Drive under Existing Plus Project conditions. Along this roadway segment, the 2018 project would result in an increase of 0.1 A-weighted decibel (dBA) under Plus Project conditions. This increase is well below the 5 dBA Community Noise Equivalent Level (CNEL) increase that would be considered a substantial permanent increase in ambient noise levels compared with noise levels that would exist without the project. In addition, the Downtown Specific Plan determined that 24-hour average outdoor noise levels within the Plan Area, of which the project site is a part, would not substantially increase with full buildout. Therefore, the impact was determined to be less than significant.

The 2018 IS/MND also analyzed project-related stationary source noise impacts, including noise from parking lot activity and mechanical equipment operations. The analysis determined that reasonable worst-case parking lot noise levels would not result in even a perceptible increase in the hourly average noise levels in the project vicinity. Therefore, the impact of noise produced by project-related parking lot activities on sensitive off-site receptors was determined to be less than significant. Similarly, the analysis determined that mechanical ventilation equipment operational noise levels (with noise attenuation provided by the proposed fence and the steel panel enclosure) would attenuate to approximately 50 dBA L_{eq} as measured at the nearest off-site receptor. These noise levels would be below the both the City's daytime and nighttime maximum outdoor noise level standards, and would therefore not result in a substantial permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the City's noise ordinance. Therefore, the impact of project-related stationary noise sources was determined to be less than significant.

The proposed changes to the 2018 project would not result in any substantial changes to the construction footprint, and therefore, project construction noise impacts would remain the same as those identified in the 2018 IS/MND, being reduced to less than significant with implementation of MM J-1. Therefore, implementation of the proposed project changes would still result in less than significant project-related construction noise impacts.

The proposed project changes would result in 72 net daily vehicle trips during operation beyond what was analyzed in the 2018 IS/MND. The 2018 analysis showed that the 2018 project would generate a total of 220 gross daily vehicle trips. Therefore, the proposed project changes would only result in an approximate 33 percent increase in the project's gross daily vehicle trips. The 2018 IS/MND analysis showed that the highest project-related increase in traffic noise levels on roadway segments in the project vicinity would be a 0.1 dBA increase along Oak Grove Avenue. Therefore, a 33 percent increase in project gross daily vehicle trips would contribute to a less than 1 dBA increase overall in traffic noise levels on roadway segments in the project vicinity. This increase is well below the 5 dBA CNEL increase that would be considered a substantial permanent increase in ambient noise levels compared with noise levels that would exist without the project. In addition, the Downtown Specific Plan determined that 24-hour average outdoor noise levels within the Plan Area, of which the project site is a part, would not substantially increase with full buildout. Therefore, even with

implementation of the project changes, project-related traffic noise impacts would remain less than significant.

The proposed changes to the 2018 project would not locate parking areas or proposed mechanical equipment closer to off-site receptors than what was proposed in the 2018 IS/MND. In fact, the proposed mechanical ventilation condenser units would now be located within the parking garage or on the rooftop. Therefore, the shielding provided by the parking garage and the distance attenuation and shielding provided by the rooftop parapet would substantially reduce the mechanical ventilation condenser units operational noise levels as measured at the nearest property line compared to the noise levels analyzed in the 2018 IS/MND. Therefore, the impact of project-related stationary noise sources would remain less than significant.

Therefore, the proposed project changes would not generate more substantial temporary or permanent noise increase impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the project would generate excessive groundborne vibration or groundborne noise levels. The analysis determined that the nearest off-site structure to the proposed construction areas where heavy construction equipment would operate would be the residential structures located southwest of the project site, approximately 30 feet from the proposed construction footprint where heavy equipment would operate. At this distance, groundborne vibration levels could range up to 0.076 peak particle velocity (PPV) from operation of a small vibratory roller. This is below the industry standard vibration damage criterion of 0.2 PPV for this type of structure, a building of non-engineered timber construction. Therefore, construction-related groundborne vibration impacts would be considered less than significant. Furthermore, the analysis determined that implementation of the 2018 project would not include any permanent sources that would expose persons in the project vicinity to groundborne vibration levels that could be perceptible without instruments at any existing sensitive land use in the project vicinity. Therefore, no impact from project-related groundborne vibration or noise would occur.

The 2018 project's overall construction footprint and overall operations would remain the same. Therefore, the proposed project changes would not generate more severe groundborne vibration or noise impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether the project would expose people residing or working in the project area to excessive noise levels from airport or private airstrip noise levels. The analysis determined that SFO is located approximately 2.11 miles north of the project site, which is outside the 60 dBA CNEL airport noise contour. The project site is also located more than 7 miles from the nearest private airstrip, the San Carlos Airport/Hiller Aviation Center. Therefore, airport noise at the site would be less than the 60 dBA CNEL maximum required for residential land uses, and no impact would occur.

The project site would remain in the same location. Therefore, the proposed project changes would not expose people residing or working in the project area to more severe airport noise impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to noise, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIV. Population and Housing *Would the project:*					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Less than significant impact	No	No	No	None
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than significant impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the project would induce substantial unplanned population growth. The 2018 IS/MND concluded that population growth induced by the project would be approximately 55 persons, which is consistent with the Burlingame General Plan Housing Element and that implementation of the 2018 project would not induce substantial population growth. Impacts were determined to be less than significant.

The proposed project would replace existing uses with a 44 unit live/work development. The department of Finance estimates that the average persons per household in the City of Burlingame is 2.4.[8] Using this multiplier, the proposed project would be expected to house approximately 106 people.[9] The proposed changes to the 2018 project would be consistent with the project site's C-2 zoning district regulations. The City of Burlingame Housing Element states that there is an average yearly need for 108 units of housing[10] based on an estimated

[8] State of California Department of Finance. 2020. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark. Website: https://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed March 23, 2021.

[9] 44 units x 2.4 average persons per household = 105.6 persons estimated to live on the project site.

[10] City of Burlingame. 2015. 2015-2023 Housing Element. Website: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/1-Burlingame_2015-2023-HE_Adopted_01.05.15_Final_01.29.pdf. Accessed March 23, 2021.

population of 31,700 by 2020.[11] However, the population as of January 2020, was 30,118.,[12] and the projected 2030 population is 34,800.[13] Therefore, the estimated population increase caused by the 2018 project would be within the projected population growth already accounted for in the City of Burlingame Housing Element. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

b) The 2018 IS/MND considered whether the project would displace substantial numbers of existing housing or people. The 2018 IS/MND concluded that, while the 2018 project would remove two dwelling units, the project would replace them with a greater number of housing units. While the residents of the existing dwellings would be required to relocate, there are many unoccupied housing units in the City of Burlingame. It was determined that impacts would be less than significant.

The existing conditions within the project site have not changed since the 2018 IS/MND was approved. The project site currently consists of an automobile repair facility and two dwelling units. Based on the City's average persons per household of 2.4, the two dwelling units house approximately 5 persons.[14] The proposed project would still displace both units. However, 5.6 percent of households in the City of Burlingame were vacant as of 2020, meaning there were about 1,661 vacant homes. The proposed changes to the 2018 project would also create more available housing units than what was originally proposed. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to population and housing, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

[11] City of Burlingame. 2015. 2015-2023 Housing Element. Website: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/1-Burlingame_2015-2023-HE_Adopted_01.05.15_Final_01.29.pdf. Accessed March 23, 2021.

[12] State of California Department of Finance. 2020. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark. Website: https://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed March 23, 2021.

[13] City of Burlingame. 2015. 2015-2023 Housing Element. Website: https://cms6.revize.com/revize/burlingamecity/document_center/Planning/1-Burlingame_2015-2023-HE_Adopted_01.05.15_Final_01.29.pdf. Accessed March 23, 2021.

[14] State of California Department of Finance. 2020. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark. Website: https://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/. Accessed March 23, 2021.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XV. Public Services *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*					
a) Fire protection?	Less than significant impact	No	No	No	None
b) Police protection?	Less than significant impact	No	No	No	None
c) Schools?	Less than significant with mitigation incorporated	No	No	No	MM PS-1
d) Parks?	Less than significant impact	No	No	No	None
e) Other public facilities?	Less than significant impact	No	No	No	None

Discussion

a)-b) The 2018 IS/MND considered whether the project would result in substantial adverse physical impacts associated with the provision of new fire and police services and associated facilities. The 2018 IS/MND concluded that the project is within the Burlingame Downtown Specific Plan and that the Burlingame Downtown Specific Plan EIR determined that all development within the Plan Area would result in a less than significant impact to police and fire services. It also concluded that the population increase caused by the 2018 project is accounted for in the General Plan and Downtown Specific Plan and that the 2018 project would be consistent with the North California Drive Commercial District land use designation. Impacts were determined to be less than significant.

As discussed in Section XI Land Use and Section XIV Population and Housing, the proposed changes to the 2018 project would still be consistent with the North California Drive Commercial District land use designation. While the 2018 project would have had an estimated population increase of 55 people, the proposed population increase would be approximately

106 people. However, the estimated population increase would be consistent with the General Plan. Therefore, impacts would remain less than significant.

c) The 2018 IS/MND considered whether the project would result in substantial adverse physical impacts associated with the provision of new school services and associated facilities. The 2018 IS/MND determined that the proposed project would yield 42 students. The applicant would be responsible for paying all school impact fees at the time of building permit issuance to account for the impacts of these additional students to schools. Impacts were determined to be less than significant with mitigation incorporated.

The Burlingame School District and the San Mateo Union High School District would still provide public education services for the project site. Utilizing the State of California housing unit yield of 0.7 students per unit, the proposed changes to the 2018 project is expected to result in approximately 31 students.[15] The applicant would still be responsible for paying all school impact fees at the time of building permit issuance. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the project would result in substantial adverse physical impacts associated with the provision of new park facilities. The 2018 IS/MND determined that, while the 2018 project would not propose any new park space, the project is 980 feet from Alpine Playground and would not change the park acreage-to-resident ratio of 1 park acre for every 312 residents. The Specific Plan could result in new public parks, open spaces, and landscaped areas that would also serve the project site. It was determined that impacts to parks would be less than significant.

As stated in Section XIV. Population and Housing, while the 2018 project would have had an estimated population increase of 55 people, the proposed population increase would be approximately 106 people. However, the estimated population increase would be consistent with the General Plan. This population increase would not change the park acreage to resident ratio. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND considered whether the project would result in substantial adverse physical impacts associated with the provision of other public facilities. The 2018 IS/MND concluded that while the project would create an increased demand for other public services such as childcare, hospitals, and libraries, the small-scale population increase would be consistent with the Specific Plan and would result in an expanded tax base to support these public facilities. Impacts were determined to be less than significant.

As stated in Section XIV, Population and Housing, the proposed changes to the 2018 project would increase the population by approximately 106 people. The proposed project would still be consistent with the Specific Plan and create an expanded tax base. Therefore, the proposed

[15] State Allocation Board Office of Public School Construction. Enrollment Certification/Projection School Facility Program. Website: https://www.dgsapps.dgs.ca.gov/OPSC/ab1014/sab50-01instructions.pdf Accessed March 26, 2021.

project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

MM PS-1 The project applicant would be responsible for paying all school impact fees at the time of building permit issuance.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to public services, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVI. Recreation *Would the project:*					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than significant impact	No	No	No	None
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	No impact	No	No	No	None

Discussion

a)-b) The 2018 IS/MND considered whether the project would result in impacts to recreational facilities. The 2018 IS/MND concluded that although the increase in population would affect existing neighborhood parks and recreational facilities, it would be consistent with the population growth expected in the City of Burlingame General Plan Housing Element. Additionally, the 2018 project would be subject to payment of development impact fees, a portion of which applies directly to the Parks and Recreation Department. The 2018 project would not include and would not require the construction of public recreational facilities. Impacts were determined to be less than significant.

As stated in Section XIV, Population and Housing, while the 2018 project would have had an estimated population increase of 55 people, the project as currently proposed would result in an increase of approximately 106 people. The estimated population increase would be consistent with the General Plan and Housing Element. The proposed project would be subject to additional development impact fees to account for the greater number of units, and a portion of these impact fees would apply directly to the Parks and Recreation Department, allowing Burlingame to implement public improvement, public services, and community amenities. The proposed project would not include nor require the construction of public

recreational facilities. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None required.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to recreation, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVII. Transportation *Would the project:*					
a) Conflict with a program plan, ordinance or policy of the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than significant impact	No	No	No	None
b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	This checklist question did not exist at the time the 2018 IS/MND was approved.	No	No	No	None
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Less than significant impact	No	No	No	None
d) Result in inadequate emergency access?	No impact	No	No	No	None

Discussion

a) The 2018 IS/MND considered whether the project would conflict with a program, plan, ordinance or policy of the circulation system, including transit, roadway, bicycle, and pedestrian facilities. The 2018 IS/MND concluded that the project would generate 123 new daily vehicle trips, but that the change in Level of Service (LOS) would be minimal. LOS is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little to no delay, to LOS F, or jammed conditions with excessive delay. The City of Burlingame level of service standards were used to evaluate the signalized study intersections. None of the studied intersections had a change in LOS when project trips were added. Impacts were determined to be less than significant.

Potential traffic impacts from the proposed project were analyzed in the Transportation Analysis memorandum prepared by Hexagon Transportation Consultants, Inc. on March 12, 2021 (Appendix E). The proposed project would develop 44 live/work units rather the originally proposed 26 units, meaning the project would generate more peak-hour vehicle trips. While the 2018 project was projected to generate 123 trips per day, the current project is expected to generate 195 trips per day. As illustrated in Table 8, the peak-hour LOS would not change when comparing background traffic conditions and background traffic conditions plus the proposed project trips. The LOS would not change with the additional trips generated by the revised proposed project.

Table 8: Peak-hour LOS for Background and Background Plus Project

Intersection	Peak-hour	Count Date	Background[1]		Background Plus Project[2]	
			Average Delay (sec)	LOS	Average Delay (sec)	LOS
Carolan Avenue and Oak Grove Avenue	AM	05/23/17	15.2	C	15.3	C
	PM	05/23/17	12.9	B	12.9	B
California Drive and Oak Grove Avenue	AM	04/24/19	19.6	B	19.7	B
	PM	04/24/19	15.9	B	16.0	B
Ansel Road and Oak Grove Avenue	AM	01/11/18	11.5	B	11.5	B
	PM	01/11/18	11.0	B	11.1	B
El Camino Real and Oak Grove Avenue	AM	01/11/18	13.2	B	13.2	B
	PM	01/11/18	12.7	B	12.6[3]	B

Notes:
[1] Background traffic volumes reflect traffic added by projected volumes from approved but not yet completed developments in the project area.
[2] Background traffic volumes reflect traffic added by projected volumes from approved but not yet completed developments in the project area. Background traffic volumes with the project were estimated by adding to background traffic volumes to the additional traffic generated by the project. Background plus project conditions were evaluated relative to background conditions to determine potential project impacts.
[3] Because of low delay and the small amount of traffic added, modeling reduced the delay slightly.
* Because of limitations within the Synchro software, the intersection of Carolan and Oak Grove Avenue cannot be evaluated with three stop-controlled approaches and one free-flowing approach. Therefore, the study intersection was evaluated as an all-way stop control intersection to provide a conservative level of service analysis.
** A 1 percent per year growth factor was applied to escalate the counts to 2020.
Source: Hexagon 2021.

The proposed project would include four bicycle parking spaces. The project site is located within the downtown area and is walking distance from several commercial shops and other amenities. The project site is located less than 0.5 mile from public transit stops, as discussed below. These features would reduce vehicle trips resulting from the proposed project.

The proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND and therefore would not conflict with a program, plan, ordinance or policy of the circulation system. No additional analysis is required.

b) This checklist question did not exist at the time that the 2018 IS/MND was approved. No conclusion was made about whether the 2018 project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b).

CEQA Guidelines Section 15064.3, subdivision (b) states that "projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact."[16] The proposed project is approximately 0.3 mile from the Burlingame Caltrain[17] Station, which is considered a major transit stop. In addition, the proposed project is approximately 0.3 mile from El Camino Real, which is considered a high-quality transit corridor. Because the proposed project would be within 0.5 mile of an existing major transit stop and a high-quality transit corridor, the project would not conflict with CEQA Guidelines Section 15064.3, subdivision (b), and therefore impacts would be less than significant.

c) The 2018 IS/MND considered whether the 2018 project would substantially increase traffic hazards due to a design feature or incompatible uses. The 2018 IS/MND concluded that there is a potential hazard related to adequate site distance from the proposed project's driveway on Oak Grove Avenue. For the driveway on Oak Grove Avenue, the Caltrans stopping sight distance is 200 feet, based on the posted roadway speed of 30 feet. This means that a driver exiting the driveway must be able to see 200 feet in both directions along Oak Grove Avenue in order to avoid collision with on-coming traffic. It was determined that to maintain an adequate sight distance, on-street parking shall be prohibited on the project driveway and the western neighboring driveway, as required by MM TRANS-1. Impacts were determined to be less than significant with mitigation incorporated.

The TIA reviewed the location of the proposed project driveway with regard to traffic volume, delays, vehicle queues, geometric design, and sight distance. Access to the project site would be provided via a single full-access driveway on Oak Grove Avenue. The project driveway is shown to be 18 feet wide and would provide access to the project's parking garage. The City of Burlingame Zoning Code requires a minimum of either two 12-foot driveways or one 18-foot driveway for parking areas of more than 30 vehicle spaces. Therefore, the proposed project would meet the City's minimum width requirement for a two-way driveway.

The location of the project driveway was also reviewed with respect to other driveways in the vicinity of the project, including San Mateo Avenue, which is a very short alley-like street, located directly across the proposed project driveway location. There are roughly 40 parking spaces that can be accessed from San Mateo Avenue. Traffic counts are not available, but a worst-case assumption was made, in that one-half of those parking spaces would turn over during the peak hour, equating to 40 peak-hour trips (20 in and 20 out). With such a small

[16] Association of Environmental Professionals (AEP). 2021. 2021. 2021 CEQA California Environmental Quality Act Statutes and Guidelines. Section 15064.03 Determining the significance of transportation impacts. Website: https://www.califaep.org/docs/CEQA_Handbook_2021.pdf. Accessed April 8, 2021.

[17] Caltrain. 2021. About Caltrain. Website: https://www.caltrain.com/about.html. Accessed April 8, 2021.

number of trips, there would not be any operational problems created by having the project driveway and San Mateo Avenue opposite each other.

Similar to the 2018 project, the project as currently proposed would have a similar driveway alignment, and would also be required to implement MM TRANS-1 to prohibit on-street parking and provide an acceptable sight distance. With this mitigation incorporated, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project result in inadequate emergency access. The 2018 IS/MND concluded that emergency vehicle access to the project site would be provided through an 18-foot driveway as well as on Oak Grove Avenue and California Drive. The Central County Fire Department would review project plans to ensure compliance with all applicable fire and building code standards. It was determined that no impact would occur.

The revised proposed project would provide one driveway, off Oak Grove Avenue. The Central County Fire Department would still review project plans to ensure that adequate fire and life safety measures are incorporated. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

MM TRANS-1 In order to maintain adequate sight distance, on-street parking shall be prohibited on Oak Grove Avenue between the project driveway and the western neighboring driveway and between the project driveway and the California Drive/Oak Grove Avenue intersection.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to transportation, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XVIII. Utilities and Service Systems *Would the project:*					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	This checklist question did not exist at the time the 2018 IS/MND was approved.	No	No	No	None
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 impact	No	No	No	None
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than significant impact	No	No	No	None
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 impact	No	No	No	None

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	Less than significant impact	No	No	No	None

Discussion

a) This question did not exist at the time that the 2018 IS/MND was approved. However, the 2018 IS/MND analyzed whether the 2018 project would require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. The 2018 IS/MND concluded that the Wastewater Treatment Plant (WWTP) provides Wastewater services within the City of Burlingame. The WWTP has a designed capacity to treat 5.5 million gallons per day (mgd) during dry average weather flow and a capacity of 16 mgd during wet weather, but the flow is currently approximately 3 to 3.5 mgd and is not expected to increase significantly in the foreseeable future.

The SFPUC provides potable water to the entire City of Burlingame, and the Bay Area Water Users Association (BAWUA) holds a water supply contract with the SFPUC. The BAWUA contractually limits the SFPUC with a provision of 184 mgd, 5.23 mgd of which is allocated to the City of Burlingame. According to the 2015 Urban Water Management Plan, the City is projected to use 4.92 mgd by 2020. The City is not anticipated to reach an estimated gross water use of 5.19 mgd until 2035.

According to the City of Burlingame 2015 Urban Water Management Plan (Urban Water Management Plan), the daily per capita water use target for 2020 was 135 gallons per day (GPD), so with an estimated on-site population of 55, daily water demand was estimated to be approximately 7,425 GPD. Therefore, it was determined that sufficient wastewater capacity is available, and the 2018 project would not exceed wastewater treatment requirements. Impacts were determined to be less than significant.

The estimated resident population of the proposed project when accounting for the proposed changes is approximately 106 persons. Utilizing the per capita water use target of 135 GPD, the

proposed project would likely use approximately 14,310 GPD. [18,19] Given the available water and wastewater capacity stated above, the WWTP would be able to serve the proposed project and would not require new or expanded water or wastewater treatment services.

The proposed project would construct a new water line on-site, connecting to the existing water line on Oak Grove Avenue. It would construct a new fire service line, which would also connect to the water line on Oak Grove Avenue. A new gas line would be constructed on-site and connect to the existing gas line on Oak Grove Avenue. A storm drain line would be constructed around nearly the entire project site and connect to the existing storm drain on California Drive. However, no construction of utilities would occur off-site. Although new required utilities and service systems would be constructed on-site, no wastewater treatment infrastructure, telecommunications facilities, or electric power lines would need to be constructed or expanded for the proposed project. Therefore, impacts would be less than significant.

b) The 2018 IS/MND considered whether the 2018 project would have sufficient water supplies. The 2018 IS/MND concluded that the 2018 project would generate a demand of 7,425 GPD of water per day. The increase in water demand would be consistent with the Urban Water Management Plan's projected water consumption in the C-2 District because the City of Burlingame was allocated 5.23 mgd by 2020. No new expanded entitlements would be needed. It was determined that impacts would be less than significant.

As stated in Impact (a), the 2018 project with proposed changes would likely use approximately 14,310 GPD. The BAWUA contractually limits the SFPUC with a provision of 184 mgd, 5.23 mgd of which is allocated to the City of Burlingame. According to the 2015 Urban Water Management Plan, the City WAS projected to use 4.92 mgd by 2020. The City is not anticipated to reach an estimated gross water use of 5.19 mgd until 2035. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

c) The 2018 IS/MND considered whether wastewater treatment providers would have adequate capacity to serve the 2018 project's projected demand for wastewater treatment services. The 2018 IS/MND concluded that the WWTP has a designed capacity to treat 5.5 mgd during dry average weather flow. On average, the WWTP treated 2.9 mgd of wastewater in the year 2009 (at 53 percent capacity). The 2018 project was expected to generate 7,150 GPD of wastewater. Therefore, it was determined that sufficient wastewater capacity is available, and the 2018 project would not exceed wastewater treatment requirements. Impacts were determined to be less than significant.

As stated in Impact (a), the 2018 project with proposed changes would likely use approximately 14,310 GPD. The WWTP has a designed capacity to treat 5.5 mgd during dry average weather

[18] City of Burlingame. 2016. 2015 Urban Water Management Plan. Website: https://cms6.revize.com/revize/burlingamecity/document_center/Water/2015%20Urban%20Water%20Management%20Plan.pdf. Accessed March 29, 2021.

[19] 135 per capita gpd multiplied by 106 persons occupying the project site is equal to 14,310 gpd used by the project site.

flow and a capacity of 16 mgd during wet weather, but the flow is currently approximately 3 to 3.5 mgd and is not expected to increase significantly in the foreseeable future. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

d) The 2018 IS/MND considered whether the 2018 project would be served by a landfill with sufficient permitted capacity. The 2018 IS/MND concluded that the project site would utilize the San Carlos Transfer Station and Ox Mountain Sanitary Landfill. San Carlos Transfer station can process 3,000 tons per day. Ox Mountain Sanitary Landfill has a maximum permitted capacity of 37.9 million cubic yards and a maximum permitted throughput of 3,598 tons per day. The agreement between Ox Mountain Landfill and the San Carlos Transfer station was set to expire in 2018 and the Ox Mountain Landfill is scheduled to cease operation by 2034.

The EPA estimates that construction of residential uses results in a solid waste generation rate of approximately 4.28 pounds per square foot. According to solid waste generation estimates using standard residential waste generation rate provided by CalRecycle, 10 pounds per unit are generated per day. It was determined that construction waste would generate 72.13 tons, operational waste would generate .15 tons per day, and that sufficient capacity was available at the San Carlos Transfer station and the Ox Mountain Sanitary Landfill. Impacts were determined to be less than significant.

As stated previously, it is estimated that construction residential uses would generate approximately 4.28 pounds of solid waste per square foot of construction. The total floor area of the 2018 project with proposed changes is 10,026 square feet, so construction of the proposed project would be expected to generate approximately 42,911 pounds of solid waste, which is about 21.5 tons.[20]

As stated previously, a residential unit generates around 10 pounds of solid waste each day. The proposed project would be 44 residential units, so it would generate 440 pounds of solid waste every day, which is 0.22 tons per day.[21,22]

Ox Mountain Landfill still serves the project site, according to a phone call with Recology San Mateo County on March 29, 2021. The proposed project and population increase is consistent with the Specific Plan, and Ox Mountain Landfill would still have capacity to serve the project site. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

e) The 2018 IS/MND considered whether the 2018 project would comply with federal, State, and local statutes and regulations related to solid waste. The 2018 IS/MND concluded that the solid waste disposal facilities must follow federal, State, and local statutes and regulations related to the collection of solid waste. The project would comply with all State and local requirements,

[20] 4.28 pounds of waste per residential square foot constructed multiplied by 10,026 square feet of residential floor area is equal to 42,911 pounds of solid waste.
[21] 10 pounds of solid waste per residential unit per day multiplied by 44 residential units is equal to 440 pounds of solid waste per day.
[22] 1 pound is equal to 0.0005 US tons. 440 pounds of solid waste per day multiplied by the conversion factor of 0.0005 is equal to 0.22 tons per day .

namely, Municipal Code Chapters 8.17 and 18.30. It was determined that impacts would be less than significant.

The proposed project would still follow federal, State, and local statutes and regulations related to the collection of solid waste and would still comply with all State and local requirements. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

Mitigation Measures

None.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to Utilities and Service Systems, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XIX. Wildfire *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?	This checklist question did not exist at the time that the 2018 IS/MND was approved.	No	No	No	None
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	This checklist question did not exist at the time that the 2018 IS/MND was approved.	No	No	No	None
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	This checklist question did not exist at the time that the 2018 IS/MND was approved.	No	No	No	None
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?	This checklist question did not exist at the time that the 2018 IS/MND was approved.	No	No	No	None

Discussion

a) This question was addressed in Section 8, Hazards and Hazardous Materials, Impact (g), at the time that the 2018 IS/MND was approved. The 2018 IS/MND concluded that that the 2018 project's access routes would remain consistent with those already in existence in the vicinity of the project site. Project construction would not obstruct surrounding roadways and access routes. The 2018 IS/MND determined that no impact would occur.

Access to the project site would continue to be provided via a driveway on Oak Grove Avenue. The driveway would be 18 feet in width and would comply with City standards. Emergency vehicle access would be available on California Drive and Oak Grove Avenue, separate from the project driveway. The projects access routes would remain consistent with the requirements of the City of Burlingame. Construction of the proposed project still would not obstruct surrounding roadways and access routes. Therefore, the proposed project would not introduce impacts or create more severe impacts than those analyzed in the 2018 IS/MND. No additional analysis is required.

b) This checklist question did not exist at the time that the 2018 IS/MND was approved. No conclusion was made about whether slope, prevailing winds, or other factors would have a significant impact on wildfire risks and their potential to expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

The proposed project is located in a Local Responsibility Area (LRA) and is not located in a Fire Hazard Severity Zone.[23,24] The closest Very High Fire Hazard Severity Zone is 1.46 miles south of the project site. Project occupants could be exposed to pollutant concentrations from a wildfire because of this proximity to a Very High Fire Hazard Severity Zone. However, this risk would apply to nearly all development within the City. The City of Burlingame has moderate wind patterns, and the project site is located on relatively flat land. The proposed project would not introduce impacts or create more severe impacts.

Therefore, impacts would be less than significant.

c) This checklist question did not exist at the time that the 2018 IS/MND was approved. No conclusion was made about whether the project would have significant impacts related to the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment. Infrastructure related impacts were addressed in the 2018 IS/MND in Section 17, Utilities and Service Systems, which describes the City of Burlingame's existing utility systems and potential environmental effects

[23] California Department of Forestry and Fire Protection (CAL FIRE). 2008. Very High Fire Hazard Severity Zones in LRA As Recommended By CAL FIRE. Website: https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/Fire%20Hazard%20Severity%20Zones.pdf. Accessed March 23, 2021.

[24] California State Geoportal. 2020. California Fire Hazard Severity Zones. Website: https://gis.data.ca.gov/datasets/31219c833eb54598ba83d09fa0adb346?geometry=-122.677%2C37.534%2C-122.024%2C37.630. Accessed March 23, 2021.

related to utility services. It was concluded that impacts related to utilities and service systems would be less than significant.

The proposed project is located in an LRA and is not located in a Fire Hazard Severity Zone.[25,26] The proposed project would construct a new fire service line, which would also connect to the water line on Oak Grove Avenue. A new gas line would be constructed on-site and connect to the existing gas line on Oak Grove Avenue. However, no construction of utilities would occur off-site, and all utility lines would be underground, reducing fire risk. No wastewater treatment infrastructure, telecommunications facilities, or electric power lines would need to be constructed or expanded. The proposed project would not introduce impacts or create more severe impacts. Therefore, impacts would be less than significant.

d) This checklist question did not exist at the time that the 2018 IS/MND was approved. However, Section 6, Geology and Soils, Impact (a)(iv) of the 2018 IS/MND concludes that the topography of the site is relatively flat and not adjacent to a hillside. Therefore, the site would not be susceptible to landslides.

According to California Geological Survey, the project site is not located in a landslide zone.[27] Because the project site is relatively flat and is not adjacent to a hillside, it is unlikely that the proposed project would expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. The proposed project would not introduce impacts or create more severe impacts. Therefore, impacts would be less than significant.

Mitigation Measures

None.

Conclusion

Because there is no new information identifying new significant effects, nor is there an increase in the severity of previously identified impacts related to Wildfires, additional mitigation is not necessary and no additional environmental document is required. The conclusions from the 2018 IS/MND remain unchanged when considering the revised design for the proposed project.

[25] California Department of Forestry and Fire Protection (CAL FIRE). 2008. Very High Fire Hazard Severity Zones in LRA As Recommended By CAL FIRE. Website: https://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/Fire%20Hazard%20Severity%20Zones.pdf. Accessed March 23, 2021.

[26] California State Geoportal. 2020. California Fire Hazard Severity Zones. Website: https://gis.data.ca.gov/datasets/31219c833eb54598ba83d09fa0adb346?geometry=-122.677%2C37.534%2C-122.024%2C37.630. Accessed March 23, 2021.

[27] California Geological Survey. Earthquake Zones of Required Investigation. Website: https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed March 23, 2021.

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
XX. Mandatory Findings of Significance					
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 impact with mitigation incorporated	No	No	No	MM AIR-1, MM AIR-2, MM BIO-1, MM BIO-2, MM CUL-1, MM CUL-2, MM GEO-1 through MM GEO-5, MM HYD-1, MM HYD-2, MM J-1, MMPS-1, and MM TRANS-1,
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 impact with mitigation incorporated	No	No	No	MM AIR-1, MM AIR-2, MM CUL-1, MM CUL-2

Environmental Issue Area	Conclusion in the 619-625 California Drive Development Project IS/MND	Do the Proposed Changes Involve New or More Severe Impacts?	New Circumstances Involving New or More Severe Impacts?	New Information Requiring New Analysis or Verification?	Mitigation Measures
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	Less than significant impact with mitigation incorporated	No	No	No	MM AIR-1, MM AIR-2, MM CUL-1, MM CUL-2, MM GEO-1 through MM GEO-5, MM HYD-1, MM HYD-2, MM J-1, MMPS-1, and MM TRANS-1,

Discussion

a) The 2018 IS/MND indicated that construction of the proposed project may have the potential to degrade the quality of the environment. The 2018 IS/MND noted that implementation of MM AIR-1 and MM AIR-2; MM BIO-1 and BIO-2; MM GEO-1 through MM GEO-5; MM HYD-1 and MM HYD-2; MM CUL-1 and MM CUL-2; and MM J-1, MM PS-1, and MM TRANS-1 would reduce impacts to a level of less than significant.

The revised proposed project would develop 44 live/work units and associated parking and infrastructure on the same 0.45-acre site analyzed in the 2018 IS/MND. As such, the proposed revised project would not result in a new significant impact or a substantial increase in the severity of a previously identified impact. Therefore, the conclusions from the 2018 IS/MND remain unchanged.

b) The 2018 IS/MND indicated that implementation of the 2018 project may have the potential to cause cumulatively considerable impacts. The 2018 IS/MND noted that implementation of MM Air-1, MM AIR-2, MM CUL-1, and MM CUL-2 would reduce impacts to a level of less than significant.

The revised proposed project would implement all of the mitigation measures proposed in the 2018 IS/MND. As such, the revised proposed project would not result in a new significant impact or a substantial increase in the severity of a previously identified impact. Therefore, the conclusions from the 2018 IS/MND remain unchanged.

c) The 2018 IS/MND indicated that implementation of the project may have the potential to adversely impact human beings. The 2018 IS/MND found that implementation of MM AIR-1

and MM AIR-2; MM CUL-1 and MM CUL-2; MM GEO-1 thorough MM GEO-5; MM HYD-1 and MM HYD-2; and MM J-1, MM PS-1, and MM TRANS-1 would reduce impacts to a level of less than significant.

The conclusions of the 2018 IS/MND would remain unchanged with the implementation of all mitigation measures.

Mitigation Measures

Implement MM AIR-1 and MM AIR-2; MM BIO-1 and BIO-2; MM CUL-1 and MM CUL-2; MM GEO-1 through MM GEO-5; MM HYD-1 and MM HYD- 2; and MM J-1, MM PS-1, and MM TRANS-1. No new mitigation measures are required.

Conclusion

The conclusions from the 2018 IS/MND remain unchanged when considering the development of the proposed project.