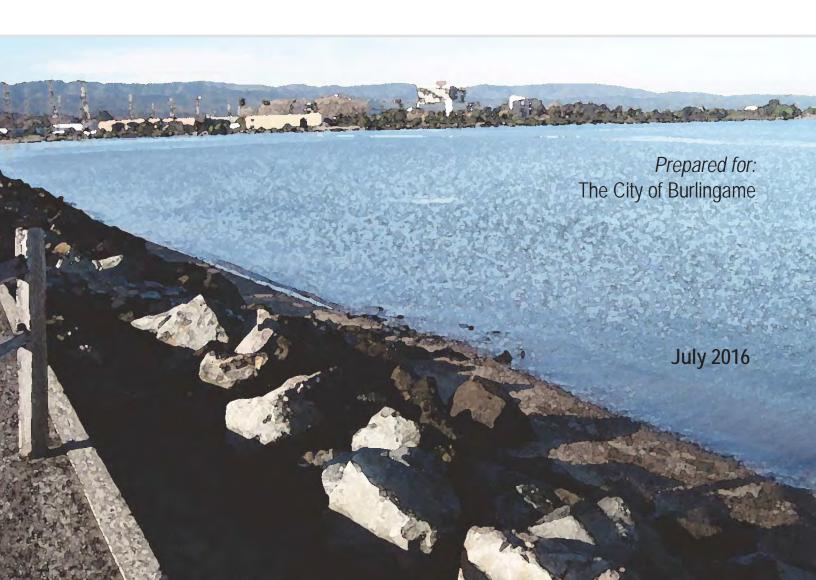






Burlingame Point Project EIR Addendum



ENVIRONMENTAL IMPACT REPORT ADDENDUM

BURLINGAME POINT PROJECT

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Acronyms and Abbreviations

Previously Proposed Project 300 Airport Boulevard Project
Project Site 300 Airport Boulevard Site

dBA A-weighted decibels

ALUC Airport Land Use Committee

ALUP Airport Land Use Plan
APN Anza Point North
APS Anza Point South

ABAG Association of Bay Area Governments
BAAQMD Bay Area Air Quality Management District

BART Bay Area Rapid Transit

BAWSCA Bay Area Water Supply and Conservation Agency

BMPs best management practices
BSD Burlingame School District
CBC California Building Code

CEQA California Environmental Quality Act

CALGreen California Green

Caltrans California Department of Transportation

City City of Burlingame

C/CAG City/County Association of Governments of San Mateo County

CAP Clean Air Plan
CWA Clean Water Act

CNEL Community Noise Equivalent Level
EDR Environmental Data Resources
EIR Environmental Impact Report
ESA Environmental Site Assessment
FTA Federal Transit Administration

FAR floor area ratio
Project Sponsor Genzon Group
GHG greenhouse gas
gsf gross square feet

HVAC heating, ventilation, and air-conditioning

in/sec inch per second

ISG Individual Supply Guarantee

ITE Institute of Transportation Engineers

I-280 Interstate 280

LEED Leadership in Energy and Environmental Design

LOS level of service msl mean sea level

MT CO₂e metric tons of carbon dioxide equivalent

mg/m³ microgram per cubic meter
MRP Municipal Regional Permit

NPDES National Pollutant Discharge Elimination System

NO_x oxides of nitrogen

PM10 particulate matter 10 microns in diameter or less
PM2.5 particulate matter 2.5 microns in diameter or less

PWWF peak wet-weather flow pph person per household ROG reactive organic gas Bay San Francisco Bay

BCDC San Francisco Bay Conservation and Development Commission

Bay Trail San Francisco Bay Trail

SFO San Francisco International Airport

SFPUC San Francisco Public Utilities Commission

SMCWPPP San Mateo Countywide Water Pollution Prevention Plan

SMUHSD San Mateo Union High School District

SFHA Special Flood Hazard Area

SR State Route

SWPPP Stormwater Pollution Prevention Plan

TAC toxic air contaminant
TIA traffic impact analysis

TCMs Transportation Control Measures

TDM Transportation Demand Management

UWMP Urban Water Management Plan

VMT vehicle miles traveled VdB vibration decibels V/C volume to capacity

WDRs Waste Discharge Requirements
WWTP Waste Water Treatment Plant

1.1 Background

In early 2015, the Genzon Group (Project Sponsor) purchased the 300 Airport Boulevard Site (Project Site) in the city of Burlingame. The approximately 18.13-acre Project Site is located in the northeastern portion of the city. Development of the Project Site would include four office/life science buildings and an amenities building, with approximately 767,000 gross square feet (gsf) of floor area. In addition, the project includes realignment of Airport Boulevard, above- and below-grade structured and surface parking, improvements to open space along San Francisco Bay (Bay) and Sanchez Channel, and an extension of the San Francisco Bay Trail (Bay Trail) through the Project Site.

The Final Environmental Impact Report (EIR) for the project was certified by the City of Burlingame (City) on June 18, 2012. Since Final EIR certification, the Project Sponsor has submitted an application to update the project design. Consequently, this addendum to the certified Final EIR addresses the proposed changes. It has been prepared to satisfy requirements of the California Environmental Quality Act (CEQA). This document will be used by decision-makers in their consideration of whether to approve the proposal for the project. For the purposes of this addendum, the 300 Airport Boulevard proposal that was analyzed in the certified Final EIR is referred to as the "Previously Proposed Project," and the revised proposal that is addressed in this addendum is referred to as the "Revised Project."

Previously Certified Final EIR

In June 2012, City Council certified the Final EIR for the 300 Airport Boulevard Project (Previously Proposed Project), as summarized in Chapter 2, *Project Description*, of this document. The Final EIR included an Initial Study, which was used to scope out resource topics with no significant impact resulting from the Previously Proposed Project. The following resource topics were not evaluated in the certified Final EIR: agriculture and forestry resources, cultural resources, geology and soils, hazards and hazardous materials, mineral resources, and public services. The certified Final EIR also included the Draft EIR, which was published in December 2011, and responses to comments on the Draft EIR, which were published in May 2012. Major conclusions for each environmental topic in the certified Final EIR are summarized in Chapter 3, *Environmental Analysis*, of this document. For ease of reference, this addendum incorporates the discussion from the certified Final EIR regarding impacts that were evaluated for the Previously Proposed Project. This approach allows the reader to compare more easily the differences between the Previously Proposed Project and the Revised Project and understand any differences in the impacts by minimizing the need to cross reference the certified Final EIR and this addendum.

1.2 CEQA Review of the Updated Project

When revisions are proposed to a project after an EIR has been certified, an agency must determine whether an addendum or a subsequent EIR is the appropriate document for analyzing the potential impacts of the revised project, pursuant to CEQA. Per CEQA Guidelines Section 15162(a), a subsequent EIR is required if:

- 1) Substantial changes are proposed in the project that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken that will require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) New information of substantial importance emerges, 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.

If none of the above conditions apply, then an addendum is the appropriate environmental document to analyze a revised project. Pursuant to CEQA Guidelines Section 15164(e), the addendum must provide a brief explanation regarding the decision not to prepare a subsequent EIR. The necessary explanation is set forth below.

As described in Chapter 2, *Project Description*, of this document, the Revised Project would maintain the uses proposed under the Previously Proposed Project and retain the basic entitled positioning of the buildings on the Project Site, with the same heights and overall bulk. In addition, the Revised Project would maintain the general building square footage (approximately 767,000 gsf) and provide the same amount of parking (2,318 stalls), which would be divided among a podium-level garage, five-level parking structure, and surface parking lots. Although the amount of square footage by land use would change slightly, this would result in a minor decrease in the number of employees and daily vehicle trips. Therefore, given these considerations, no new significant impacts or increases in the severity of previously identified significant impacts are expected to result from the Revised Project, thereby rendering a subsequent EIR unnecessary. Accordingly, as described further in this document, an addendum is the appropriate mechanism for CEQA review of the Revised Project.

The existing environmental conditions in the Project area are largely unchanged since the certification of the Final EIR. There are no new major developments proposed in the immediate vicinity that would substantially affect baseline conditions. Thus, the baseline is assumed to be the same as considered in the EIR. Regarding cumulative impacts, the addendum considers new cumulative development in the vicinity of the Project not proposed at the time the EIR was prepared (specifically the 1300 Bayshore Highway project). However, similar to the cumulative projects considered in the EIR, the majority of anticipated development in the city is not within the immediate vicinity of the Project. Further, since the Revised Project is largely the same in scope as the Previously Proposed Project, there would be no change to the Project's contribution to cumulative impacts.

1.3 Addendum Organization

Chapter 2, *Project Description*, provides a description of the Previously Proposed Project, a description of the Revised Project, and a comparison of the Previously Proposed Project to the Revised Project. Chapter 3, *Environmental Analysis*, summarizes conclusions in the certified Final EIR and presents the impacts of the Revised Project relative to the impacts of the Previously Proposed Project. Chapter 3 also addresses environmental topics that could be altered by the Revised Project, including visual quality, transportation, air quality, climate change, noise, and park and wind effects on recreation. All other impact topics are not expected to be different from those outlined in the certified Final EIR. As such, those topics are discussed briefly in Section 3.2, *Impacts Not to Be Evaluated*.

Project Description

In June 2012, the Burlingame City Council certified the Final Environmental Impact Report (EIR) for the 300 Airport Boulevard Project (Previously Proposed Project). As approved, the Previously Proposed Project included four office/life science buildings and an amenities building, with approximately 767,000 gross square feet (gsf) of floor area. In addition, the Previously Proposed Project included realignment of Airport Boulevard, above- and below-grade structured and surface parking, improvements to open space along the San Francisco Bay (Bay) and Sanchez Channel, and an extension of the San Francisco Bay Trail (Bay Trail) through the Project Site. In early 2015, the Genzon Group (Project Sponsor) purchased the Project Site and is now proposing to update the Project design. The Burlingame Point Project (Revised Project) would result in minimal changes to the original site plan and would retain the basic entitled position of the buildings on the Project Site, overall height and square footage of each building, and parking. Design refinements include the configuration of site amenities, parking, and open space as well as building architecture.

In addition to a description of the Project Site, this chapter provides a description of the Previously Proposed Project and the Revised Project as well as a comparison of the two projects.

2.1 Project Location

The approximately 18.13-acre Project Site is located in the northeastern portion of the City of Burlingame (City). The Project Site, which was formerly occupied by the Burlingame Drive-In Theater, is currently vacant and consists of impervious surfaces and vegetation. As shown in Figure 1, the Project Site is north of US 101 and immediately adjacent to the Bay to the east and Sanchez Channel to the west. The Project Site is currently accessible from Beach Road and bounded by Airport Boulevard to the north, Airport Boulevard and the Bay to the east, light-industrial buildings along Beach Road to the south, and Sanchez Channel to the west. The Bay Trail runs adjacent to the Project Site and connects to the Coyote Point Recreation Area. The Project Site consists of two parcels: Assessor's Parcel Numbers 026-350-130 and 026-350-080.

The Project Site is within the Anza Point subarea of the Bayfront Specific Plan. This subarea, with a land use designation of Anza Point Waterfront Commercial, is divided into two separate zoning districts: Anza Point North (APN) and Anza Point South (APS). The Project Site is in the APN zoning district.

The 300 Airport Boulevard Project EIR included an analysis of changes to the Bayfront Specific Plan and APN zoning district regulations, which would apply to the entirety of the APN subarea and zoning district. This includes the 300 Airport Boulevard site and an adjacent undeveloped 8.58-acre area at 350 Airport Boulevard. The certified Final EIR analyzed the potential effects of proposed planning and zoning changes on the 350 Airport Boulevard site at a programmatic level. However, the Burlingame Point Project encompasses only development at 300 Airport Boulevard. Therefore, this EIR Addendum does not consider the analysis for the 350 Airport Boulevard site, except for the wind analysis.

2.2 Previously Proposed Project

Proposed Entitlements

The Previously Proposed Project would require amendments to the Bayfront Specific Plan as well as zoning regulations to allow for a greater height and a maximum floor area ratio (FAR)² of 1.0 (an increase from the current maximum FAR of 0.6). Such amendments would also change setback requirements to allow an additional permitted use (i.e., incidental food and retail) within the APN zoning district and certain changes to parking regulations. Development would also require rezoning a 0.4-acre portion of the Project Site from the APS zoning district to the APN zoning district. Therefore, the land use entitlements listed below would need to be requested from and approved by the City.

- Amendments to the Bayfront Specific Plan and zoning regulations to increase the allowable FAR for office uses from 0.6 to 1.0 and the maximum allowed FAR for commercial recreation facilities from 0.5 to 1.0. Deletion of the requirement for a conditional use permit for commercial recreational facilities with a FAR greater than 0.5.
- Amendments to the APN zoning regulations to allow for changes to the required front, shoreline, below-grade, and parking setbacks.
- Amendments to the APN zoning regulations to allow for the increased height of buildings.
- Amendments to the Anza Point Land Use Map to reflect rezoning of portions of the Project Site from APS to APN.
- Rezoning of a small portion of Assessor's Parcel Number 026-350-130 along the south side of the Project Site from APS to APN.
- Amendments to the zoning regulations to allow for a reduction in the number of parking spaces required if the Project proposes a Transportation Demand Management (TDM) program for a demand-generating use.
- Amendments to the zoning regulations to allow for incidental food establishments and retail services in business campuses or professional office buildings of 20,000 gsf or more.
- Conditional use permit for childcare use.
- Vesting tentative parcel map to adjust property lines and realign the roadway through the Project Site.

Proposed Site Plan

The Previously Proposed Project³ consisted of an office/life science campus development. As shown in Figure 2, the Previously Proposed Project would comprise two five-story buildings (97 feet), one seven-story building (129 feet), and one eight-story building (144 feet), totaling approximately 730,000 gsf.

² FAR is a measure of building intensity, based on the ratio between the total floor area to be built on a site and the size of that site.

³ The site plan for the Previously Proposed Project, as described in this section, differs slightly from what was approved and entitled; however, the City determined that the environmental effects of the approved project were similar to, and adequately addressed by, the certified Final EIR. Accordingly, this EIR Addendum compares the Revised Project to the Previously Proposed Project as analyzed in the certified Final EIR.





Source: GENZON & Gensler, 2016.



NOT TO SCALE





These four buildings would be oriented in an east-west direction and divided by the realigned Airport Boulevard. In addition, the office buildings would be supported by a 37,000 gsf amenities center, a multi-level parking structure, and two below-grade parking areas. The five buildings, plus the amenities center, would total 767,000 gsf, which calculates to a FAR of 0.97.

The Previously Proposed Project would include several uses at the Project Site but would house mainly office/life science uses. At least 689,810 gsf would be dedicated to office/life science spaces. In addition, the Project could include a total of 19,230 gsf of retail, 24,560 gsf of food services, and 33,400 gsf of amenities, including a childcare facility and an exercise center.

A breakdown of the potential uses at the Project Site is provided in Table 2-1.

Table 2-1. Previously Proposed Project Uses at the Project Site (gsf)

Building	Office/Life Science	Retail	Food Service	Amenities (Childcare and Other)	Subtotal
Building B1	135,520	5,080	5,400	_	146,000
Building B2	134,960	5,480	5,560	_	146,000
Building B3	195,330	3,570	5,500	_	204,400
Building B4	224,000	3,900	5,700	_	233,600
Amenities Center	_	1,200	2,400	33,400	37,000
Total	689,810	19,230	24,560	33,400	767,000

Source: DES Architects + Engineers, 2010.

Each office building (Buildings B1 through B4) would include a lobby with elevators, stairwells, and space for office/life science tenants. In addition, first-floor areas could include retail space and food service areas. The roofs would include a stair enclosure, elevator penthouse, and screened areas for mechanical equipment. The first floor of the amenities center would include a reception space/lobby, locker rooms, retail space, food services, and a childcare center. The second floor would include an exercise area. To the east of the amenities building would be an outdoor children's play area, and to the south would be a swimming pool.

Airport Boulevard would be realigned to bisect the Project Site. Currently, Airport Boulevard runs east of the site before making a 90-degree turn at Fisherman's Park, after which Airport Boulevard runs north of the Project Site. The Previously Proposed Project would realign Airport Boulevard so that it would cross the Project Site, from the southeast corner to the northwest corner. Although Airport Boulevard would bisect the Project Site, the campus would be connected by various pedestrian linkages and paths.

The Previously Proposed Project would also include public access, open space, and landscaping. This would involve mainly extension of the Bay Trail, as well as connecting pedestrian paths, along the Bay in the eastern shoreline parcel; open space in the southeast corner of the Project Site; and the Bay Spur Trail on the shoreline adjacent to Sanchez Channel. No buildings would be constructed within 100 feet of the shoreline, which is on both sides of the Project Site. The shoreline band, together with the existing western and eastern shoreline revetment, would be restored and rehabilitated to provide pedestrian access.

Site Access, Circulation, and Parking

Vehicular Access and Circulation

Access to the Project Site would be from two signalized intersections. The realigned Airport Boulevard would accommodate through traffic and meet the vehicle, pedestrian, and shuttle bus access and circulation needs of the Previously Proposed Project. The driveway at 350 Beach Road would be removed; access to the site would be from Airport Boulevard only. Basement parking would be accessible from one pedestrian garage entry (between Buildings B1 and B2), three vehicular garage entries (one north of Building B1, one south of Building B2, and one between Buildings B3 and B4), and the parking structure.

Emergency vehicle access to each building would be provided from Airport Boulevard. General pick-up and delivery operations would be conducted at the drop-off areas near the entrances to all buildings, including the amenities center. Buildings B1 through B4 would have loading areas that would be set away from Airport Boulevard.

Transportation Demand Management and Parking

Under the Previously Proposed Project, a TDM program would be implemented to reduce vehicular traffic generated at the Project Site by 13 percent.⁴ The TDM program would include shuttle buses to the Millbrae Intermodal Terminal and downtown Burlingame. Improved bicycle and pedestrian linkages along the roadway and within the Project Site would support the use of alternative modes of travel.

The TDM program would reduce the need for onsite parking because fewer vehicles would access the Project Site. The Previously Proposed Project would provide onsite parking for the office/life science uses, retail and café uses in the buildings as well as the retail and cafeteria, exercise, and childcare uses within the amenities building. The parking would serve employees and visitors at Buildings B1 through B4 as well as the general public when using the amenities building and the Bay Trail. Parking would be provided in surface lots, basements, and a garage. The Project Site would include 232 surface parking stalls, 1,185 basement parking stalls, and 901 parking-structure stalls, for a total of 2,318 stalls. Of the 2,318 stalls, 34 would be designated as Americans with Disabilities Act (ADA) parking.

Bicycle/Pedestrian Access

The Previously Proposed Project would include bicycle commuter facilities to encourage the alternative mode of transportation. The Bay Trail and Bay Spur Trail system along the Sanchez Channel would be used as the primary means of bicycle access to the Project Site (Class I Bike Path). On Airport Boulevard, a 14-foot-wide inside shared lane would be provided for on-street bicycle travel (Class III Bike Path). A wide shared lane would reduce the number of "dooring" incidences as well as wrong-way and sidewalk riding. It would also help to prevent motorists from forcing cyclists into the curb or parked cars.

1

⁴ Fehr & Peers Transportation Consultants. 2011. *Burlingame Point Transportation Demand Management Program.* April 6.

Pedestrian circulation improvements would include new sidewalks on both sides of Airport Boulevard, walkways across landscaped areas at the Project Site, and crosswalks on Airport Boulevard. Walkways would serve the bicycle commuter facilities and connect to Bay Trail segments and open space at Sanchez Channel and the eastern shoreline. The intent of the roadway design would be to maintain low vehicular speeds through the Project Site, which would enhance pedestrian movements and safety. Onstreet parking would act as a traffic-calming feature and separate pedestrians from moving vehicles. Unsignalized crosswalks would have special treatments, including textured paving and in-pavement flashing lights.

Open Space and Landscaping

The Previously Proposed Project would include approximately 4.12 acres of open space and landscaped areas. In addition, the Previously Proposed Project would include improvements along the eastern shoreline of the Project Site, which would include Bay Trail/public access pathways and associated landscaped open space areas (1.39 acres) and roadways (0.18 acre). Open space at the Project Site would include a Bay Spur Trail and associated public access to and along Sanchez Channel, connections to the Bay Trail through the center of the Project Site via the east-west pedestrian promenade, smaller open space and landscaped areas throughout the Project Site, extension of the Bay Trail, and associated open space improvements along the Bay in the offsite eastern shoreline parcel. In addition, open space and landscaping throughout the Project Site would provide an additional amenity and offer gathering spaces for employees and visitors.

Landscaping throughout the Project Site and along Airport Boulevard would include onsite trees, street trees, shrubs, ground cover, berms, and decorative paved surfaces. Also included would be curvilinear concrete walls, mounds with native grasses, and other native and appropriate plant materials. In addition, the stormwater retention and treatment areas included at the Project Site would reduce drainage impacts but also serve as landscape elements. The landscape design throughout the Project Site would provide a wind-protected outdoor environment that would integrate with the new plazas and the extension of the Bay Trail. Amenities included in the design would include gateways at the south and north entries, dining courtyards, plazas, and a children's play area that would be attached to the amenities center. To accommodate the Previously Proposed Project, several existing trees would be removed. A total of 43 trees (17 onsite trees and 26 street trees) would be removed and replaced with landscaping, in accordance with the landscape plan for the project.

Activity/Employment

As stated above, the Previously Proposed Project could be used as an office or a life science campus or any combination thereof. In addition, the Previously Proposed Project could include up to 19,230 gsf of retail space and up to 24,560 gsf for food services. If the Previously Proposed Project were to include only office uses in Buildings B1 through B4, it is estimated that approximately 2,433 office employees would be generated.⁵ In addition, the amenities center could employ approximately 42 individuals,⁶ for a total of 2,475 employees under the office scenario of the Previously Proposed Project. If the Previously

⁵ DES Architects + Engineers, Memorandum from Tom Gilman and Kenny Hung to Maureen Brooks, City of Burlingame Planning Manager, March 3, 2011. This estimate assumes 300 gsf per employee, based on similar office density rates on the San Francisco Peninsula (730,000 gsf of office/300 gsf = ~2,433 employees).

⁶ Association of Bay Area Governments. 1995. *1987 Input-Output Model and Economic Multipliers for the San Francisco Bay Region*. March. Multiplier for "amusement and recreational services" averages 870 gsf per employee. As such, 37,000 gsf of proposed amenities center/870 gsf = ∼42 employees.

Proposed Project were to include only life science uses in Buildings B1 through B4, approximately 1,825 life science jobs would be created. When added to the 42 employees at the amenities center, the life science scenario of the Previously Proposed Project would provide jobs for approximately 1,867 people.

In terms of employment growth at the Project Site, office uses would generate the greatest need for employees, compared with life science, retail, food, or amenity center uses. The administrative areas of a life science uses would have a density similar to that of a corporate office; however, the research and laboratory uses would have lower densities. In addition, the retail and food service uses would not generate as many employees compared with an office-only scenario in Buildings B1 through B4. Therefore, the 300 Airport Boulevard Project EIR applied and analyzed the most conservative scenario, with approximately 2,475 office and amenities center employees at the Project Site.

Construction Schedule

Under the Previously Proposed Project, construction at the Project Site would consist of two construction phases, which may occur at the same time or overlap. Phase 1 would construct Buildings B1 and B2, realign and rebuild Airport Boulevard, and most likely construct the amenities center. It is anticipated that Phase 1 construction would last approximately 14 months. Phase 2 would construct Buildings B3 and B4, the basement (podium) parking, and the parking structure. Phase 2 construction is anticipated to begin after Phase 1 of construction is completed. There are currently no structures at the Project Site; as such, the Previously Proposed Project would not require demolition and disposal of existing buildings. Alternatively, the Previously Proposed Project could include one construction phase only. This would consist of realignment of Airport Boulevard, grading, utilities installation, construction of the underground parking structure, construction of all buildings, and landscaping and public access improvements in a single phase.

Previously Proposed Project excavation depths would vary from 0 to 7.5 feet from the finish floor of the basement garage. As such, the maximum excavation would be at an elevation of 5.5 feet below mean sea level. The proposed excavation would involve approximately 75,000 cubic yards of excavated material. About 40,000 cubic yards of the excavated material would be exported offsite; about 35,000 cubic yards would be used as backfill material or grading material at the Project Site. Typical equipment that would be used during construction would include large machinery for earthwork, one or two pile-driver rigs, large concrete pumps, concrete trucks, large cranes for steel and exterior façade installation, and typical delivery vehicles and small trucks. The number of truck deliveries would range from 10 to 40 per day.

2.3 Revised Project

Revised Project Entitlements and Site Plan

As with the Previously Proposed Project, the Revised Project would include redevelopment of an approximately 18.13-acre site located at 300 Airport Boulevard. When the Previously Proposed Project was approved in June 2012, the majority of land use entitlements, zoning amendments, and amendments to the Bayfront Specific Plan, as listed above, were approved. However, the Revised Project would require the following additional entitlements:

⁷ DES Architects + Engineers. Memorandum from Tom Gilman and Kenny Hung to Maureen Brooks, City of Burlingame Planning Manager, March 3, 2011. This estimate assumes 400 gsf per employee, based on similar life science density rates on the San Francisco Peninsula (730,000 gsf of life science/400 gsf = \sim 1,825 employees).

- An amendment to the commercial design review
- Final parcel map, subject to approval by City Council

The Revised Project would consist of an office/life science campus development. As shown in Figure 3, two office buildings, an amenity building, and a parking structure would be situated west of the realigned Airport Boulevard, and two office buildings would be situated east of the road. One level of parking, physically separated by Airport Boulevard into two areas, would be provided in a below-grade podium (basement). No buildings would be constructed within the 100-foot shoreline band. The Revised Project would comprise two five-story buildings (97 feet), one seven-story building (129 feet), and one eight-story building (144 feet),8 totaling approximately 739,857 gsf. These four buildings would be oriented in an east-west direction and divided by the realigned Airport Boulevard. In addition, the office buildings would be supported by a 26,900 gsf amenities center (32 feet in height),9 a multi-level parking structure (57.7 feet in height), and two below-grade parking areas. The five buildings, plus the amenities center, would total 766,757 gsf, which calculates to a FAR of 0.97. The Revised Project would include several uses at the Project Site but mainly office/life science uses. At least 703,370 gsf would be dedicated to office/life science spaces, plus 8,538 gsf for office conference room space. In addition, the Revised Project could include a total of 6,633 gsf of retail, 35,566 gsf of food services, and 12,650 gsf of other amenities, including a childcare facility and an exercise center.

A breakdown of the potential uses at the Project Site is provided in Table 2-2.

Table 2-2. Revised Project Uses at the Project Site (gsf)

		Office			Amenities	
	Office/Life	Conference		Food	(Childcare	
Building	Science	Space	Retail	Service	and Other)	Subtotal
Building 1	124,195	_	3,235	21,316	_	148,746
Building 2	137,224	8,538	3,398	_	_	149,160
Building 3	206,452	_	_	_	_	206,452
Building 4	235,299	_	_	_	_	235,299
Amenities Center	_	_	_	14,250	12,650	26,900
Total	$703,370^a$	8,538	6,633	35,566	12,650	766,757

Source: Gensler, 2016.

Note:

^{a.} The total for office/life science includes elevators in the promenade between the basement-level parking and the ground floor. These are not located inside any of the buildings, but they add 200 gsf to the office/life science space.

The building entry lobbies and ground-floor amenities would be oriented to connect to the pedestrian promenade directly. The amenity building would include a childcare facility with a playground, a fitness center, and a food service space. This building would be accessible to the public. However, the office conference space in Building 2 would serve the project tenants exclusively; the conference space would not be available for public use. Within the overall building massing, horizontal setbacks would be

⁸ The heights of the office buildings are measured from the average top-of-curb level to the top of the parapet on the top floor. The measurements exclude mechanical screening and the penthouse enclosures.

⁹ The height of the amenities buildings is measured to the top of the parapet surrounding the roof. Additional height extends to the top of the elevator overrun or penthouse.

introduced where the buildings front the pedestrian promenade. This would create terraces on the setbacks that overlook the promenade. The horizontal setbacks would also reduce the overall mass and bulk of the buildings. The buildings could also include landscaped rooftop terraces, which employees could access. The proposed buildings would be designed for Leadership in Energy and Environmental Design (LEED) Gold certification.

Site Access, Circulation, and Parking

Vehicular Access and Circulation

Access to the Project Site would be from the realigned Airport Boulevard, using two signalized intersections at previously entitled locations. The realigned Airport Boulevard would accommodate through traffic and provide vehicle, pedestrian, and shuttle bus access and facilitate circulation within the Project Site. The driveway at 350 Beach Road would be removed; access to the site would be from Airport Boulevard only. In addition, traffic-calming measures would be implemented. Basement parking would be accessible from pedestrian garage entries (two entries from the plaza and one entry within each building), three vehicular garage entries (one north of Building 1, one south of Building 2, and one north of Building 3), and the parking structure. Access to all parking would be through signalized intersections, thereby keeping cars outside of the pedestrian promenade.

Loading dock access would also be routed through the signalized intersections. This would separate service vehicles from the pedestrian promenade and provide the most direct path to the loading dock and service area for each building. Separate pullouts for shuttles would be located away from the pedestrian promenade. Passenger drop-off/pick-up areas would be located toward the center of the Project Site for direct access to the pedestrian promenade. However, crosswalk areas within traffic-calming zones would separate pedestrians from the drop-off/pick-up areas. A separate drop-off/pick-up area would be provided at the amenities building.

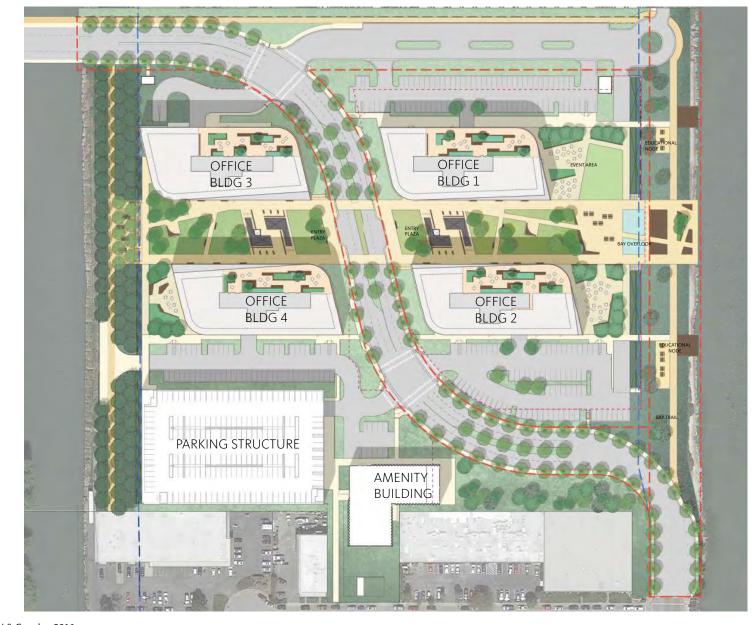
Transportation Demand Management and Parking

A TDM program would be implemented to reduce traffic to/from the Project Site, resulting in approximately 13 percent reduction in vehicle trips compared to a scenario without TDM. This would also result in an associated reduction in parking demand. The Project Site would include 214 surface parking stalls, 878 basement parking stalls, and 1,226 parking stalls in the parking structure, for a total of 2,318 stalls. Of the 2,318 stalls, 50 would be designated as ADA parking.

Bicycle/Pedestrian Access

The Revised Project would include bicycle commuter facilities to encourage the alternative mode of transportation. Bicycle access to the Project Site would be provided along the Bay Trail and also along the shared bicycle lanes on Airport Boulevard. Public bicycle parking would be provided on the Project Site where cyclists would enter as well as close to the entry lobby for each building. Public bicycle parking would also be provided in front of the amenities building. Additional bicycle parking would be provided in the basement level to meet the needs of tenants.

Pedestrian circulation improvements would include new sidewalks on both sides of Airport Boulevard, crosswalks on Airport Boulevard, and an east-west pedestrian promenade that would bisect the Project Site. Walkways would serve the bicycle commuter facilities and connect to Bay Trail segments. The



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Source: GENZON & Gensler, 2016.



pedestrian promenade would be publicly accessible and the path of entry to the office buildings. The landscaping and pedestrian promenade between the buildings would be designed for the pedestrian experience rather than vehicles. The Project Site would include pedestrian crossing zones that would flow from the pedestrian walkways to the promenade. Traffic-calming features, in the form of raised and changed paving patterns, would be located where the promenade would cross Airport Boulevard. The crosswalk areas within the traffic-calming zone would separate pedestrians from any personal vehicles that might pull over to drop off or pick up passengers. In addition, a pedestrian safety island would be located in the center of Airport Boulevard at the pedestrian promenade.

Open Space and Landscaping

The Bay Trail currently runs along the edges of the Project Site and connects to the Coyote Point Recreation Area. Wind surfing and the Poplar Creek Golf Course are also in the vicinity. The Revised Project would provide connections between the proposed open space at the Project Site and these existing recreational opportunities. The Project would also provide an open space area at the eastern end of the Project Site, facing the Bay. This open space area would connect directly to the Bay Trial and provide a publicly accessible landscaped area with access to adjacent ground-floor restaurants at proposed at Building 1. Open space at the Project Site would also include a Bay Spur Trail on the western portion of the Project Site and associated public access to and along Sanchez Channel. In general, open space and landscaping throughout the Project Site would provide an additional amenity and offer gathering spaces for both employees and visitors.

Landscaping throughout the Project Site and along Airport Boulevard would include onsite trees, street trees, shrubs, ground cover, berms, and decorative paved surfaces. Hardscape materials include the natural stone pavers, concrete pavers, concrete sidewalks and driveways, wood decking, and asphalt paving along Airport Boulevard and parts of the Bay Trail. Seating areas would use similar materials, including stone, concrete, metal, and wood. In addition, the stormwater retention and treatment areas at the Project Site would reduce drainage impacts but also serve as landscape elements. The landscape design throughout the Project Site would provide a wind-protected outdoor environment that would integrate with the new plazas and the extension of the Bay Trail. To accommodate the Revised Project, several existing trees would be removed. A total of 43 trees (17 onsite trees and 26 street trees) would be removed and replaced with landscaping, in accordance with the landscape plan for the Revised Project.

Activity and Employment

The Project Site is located between the life sciences campuses of South San Francisco and the technology campuses of Silicon Valley; therefore, the Revised Project could include tenants from either industry. If the Revised Project were to include only office uses (including the conference space) in Buildings 1 through 4, it is estimated that approximately 2,370¹⁰ office employees would be generated. In addition, the retail/food service space could employ approximately 90 individuals,¹¹ and the amenities center

¹⁰ DES Architects + Engineers. Memorandum from Tom Gilman and Kenny Hung to Maureen Brooks, City of Burlingame Planning Manager, March 3, 2011. This estimate assumes 300 gsf per employee, based on similar office density rates on the San Francisco Peninsula (711,900 gsf of office/300 gsf = ~2,370 employees).

 $^{^{11}}$ Association of Bay Area Governments. 1995. 1987 Input-Output Model and Economic Multipliers for the San Francisco Bay Region. March. Multiplier for "retail trade" and food services averages 450 gsf per employee (42,200 gsf of retail and food services/450 gsf = \sim 90 employees).

could employ approximately 15 individuals,¹² for a total of 2,475 employees under the office scenario of the Revised Project. If the Revised Project were to include only life science uses in Buildings 1 through 4 (including the conference space), approximately 1,780 life science jobs¹³ would be created. In addition to the other employees at the Project Site, the life science scenario of the Revised Project would provide jobs for approximately 1,885 people.

It is currently envisioned that Buildings 1 through 3 would include office uses, and Building 4 would include life science uses. However, office uses generate the most employment; therefore, this document conservatively assumes that all buildings would include office uses, with a total of approximately 2,475 employees. The Project Sponsor proposes that the Project Site will be operational by 2018.

Construction Schedule

Under the Revised Project, construction at the Project Site would consist of one construction phase, beginning in fall 2016 and ending in summer 2018, for a total construction duration of approximately 22 months. There are currently no structures at the Project Site; as such, the Revised Project would not require demolition and disposal of existing buildings. The maximum depth of excavation would vary from 0 to 7.5 feet from the finish floor of the basement garage. As such, the maximum excavation would be at an elevation of 5.5 feet below mean sea level. The proposed excavation would involve approximately 77,250 cubic yards of excavated material. Approximately 32,400 cubic yards of soil would be exported offsite, and about 44,850 cubic yards would be used as backfill material or grading material at the Project Site.

Typical equipment that would be used during construction of the Revised Project would include large machinery for earthwork, one or two pile-driver rigs, large concrete pumps, concrete trucks, large cranes for steel and exterior façade installation, and typical delivery vehicles and small trucks. The number of truck deliveries would range from 20 to 80 per day.

2.4 Comparison of Previously Proposed Project and Revised Project

The key goal of the Project Sponsor is to minimize changes between the Previously Proposed Project and the Revised Project. Therefore, the Revised Project retains the basic entitled position of the buildings on the Project Site, stays within the entitled parking counts, and retains the entitled traffic-calming measures. In addition, the office building massing would retain the same floor plate areas, building heights, and overall bulk as the Previously Proposed Project. Design refinements pertain mainly to the configuration of the amenities and open space as well as building architecture. However, the Revised Project would differ from the Previously Proposed Project, as follows:

¹² Association of Bay Area Governments. 1995. 1987 Input-Output Model and Economic Multipliers for the San Francisco Bay Region. March. Multiplier for "amusement and recreational services" averages 870 gsf per employee. As such, 12,650 gsf of proposed amenities center (childcare facility and exercise center)/870 gsf = ~15 employees.

 $^{^{13}}$ DES Architects + Engineers. Memorandum from Tom Gilman and Kenny Hung to Maureen Brooks, City of Burlingame Planning Manager, March 3, 2011. This estimate assumes 400 gsf per employee, based on similar life science density rates on the San Francisco Peninsula (711,900 gsf of life science/400 gsf = \sim 1,780 employees).

- Changes in the allocation of floor area for the proposed land uses, including the addition of a conference space in Building 2.
- Slight reduction in total building area (approximately 250 gsf).
- Slight shifts in building footprints to accommodate additional open space adjacent to the Bay and the Bay Trail.
- Shift in the location of Airport Boulevard by a maximum of 15 feet to the east to accommodate building footprint relocations.
- Separation of vehicle and pedestrian zones and inclusion of a pedestrian promenade, bisecting the Project Site in an east-west orientation.
- Reduced use of asphalt and increased green space.
- New parking entrances and truck access points.
- Increased basement area for parking.
- Third drive aisle on the top floor of the above-grade parking garage, within the entitled height (with the exception of the overall elevator height due to manufacturer requirements).
- Construction occurring over one phase rather than two phases. (It is important to note that although two phases were anticipated for the Previously Proposed Project, the EIR analyzed the potential for a one-phase construction period as well.)

The Revised Project would reduce overall square footage at the Project Site by approximately 250 gsf. The change in square footages is due to changes in the distribution of office, retail, food service, and amenity uses. Table 2-3, below, shows the differences in uses between the Previously Proposed Project and the Revised Project. As shown, office, office conference, and food service space would increase compared with the Previously Proposed Project, while retail and amenity use (childcare and fitness center) would decrease. Regardless, the number of employees (2,475, assuming the conservative scenario for office uses rather than life science uses) would be approximately the same under both the Previously Proposed Project and the Revised Project.

Table 2-3. Comparison of Previously Proposed Project and Revised Project Uses (gsf)

	Office/Life	Office Conference		Food	Amenities (Childcare	
Building	Science	Space	Retail	Service	and Other)	Subtotal
Building 1	-11,325	_	-1,845	15,916	_	2,746
Building 2	2,264	8,538	-2,082	-5,560	_	3,160
Building 3	11,122	_	-3,570	-5,500	_	2,052
Building 4	11,299	_	-3,900	-5,700	_	1,699
Amenities Center	_	_	-1,200	11,850	-20,750	-10,100
Total	$13,\!560^a$	8,538	-12,597	11,006	-20,750	-243

Source: Gensler, 2016.

Note:

^{a.} The total for office/life science for the Revised Project includes 200 gsf for elevators in the promenade between the basement-level parking and the ground floor.

Figures 4 through 7 compare the entitled site plans of the Previously Proposed Project with the proposed site plan for the Revised Project. The elevations for Building 1, the amenities center, and the parking garage are included in Figures 8 through 12, which provide representative views of the proposed buildings.¹⁴

2.5 Required Approvals for the Revised Project

As the public agency with principal responsibility for approving the Revised Project, the City of Burlingame would serve as the lead agency for purposes of the California Environmental Quality Act (CEQA). The Revised Project would be implemented pursuant to the Burlingame Municipal Code.

The Revised Project is expected to be subject to the following discretionary approvals from the City:

- Approval of this EIR Addendum to the certified Final EIR.
- Approval of the Mitigation Monitoring and Reporting Program (MMRP).
- An amendment to the commercial design review for development of a new office/life science campus, including four office/life science buildings, an amenities building, and a parking structure. Design review shall be based on the design guidelines for the Anza Point subarea in the Bayfront Specific Plan and the Burlingame Commercial Design Guidebook.
- Approval of a final parcel map.
- Issuance of a building permit.
- Tree removal permit(s) as required by the Municipal Code.
- Any other discretionary approval required by the City to implement the Revised Project.

The Revised Project is expected to be subject to approvals from the following agencies:

- Bay Conservation and Development Commission
- City/County Association of Governments of San Mateo County, Congestion Management Agency
- California Regional Water Quality Control Board, San Francisco Bay Region
- Bay Area Air Quality Management District
- California Department of Transportation

¹⁴ The design of Buildings 2, 3, and 4 would be similar to that presented of Building 1, although two of the buildings would be taller (seven and eight stories in height, respectively).



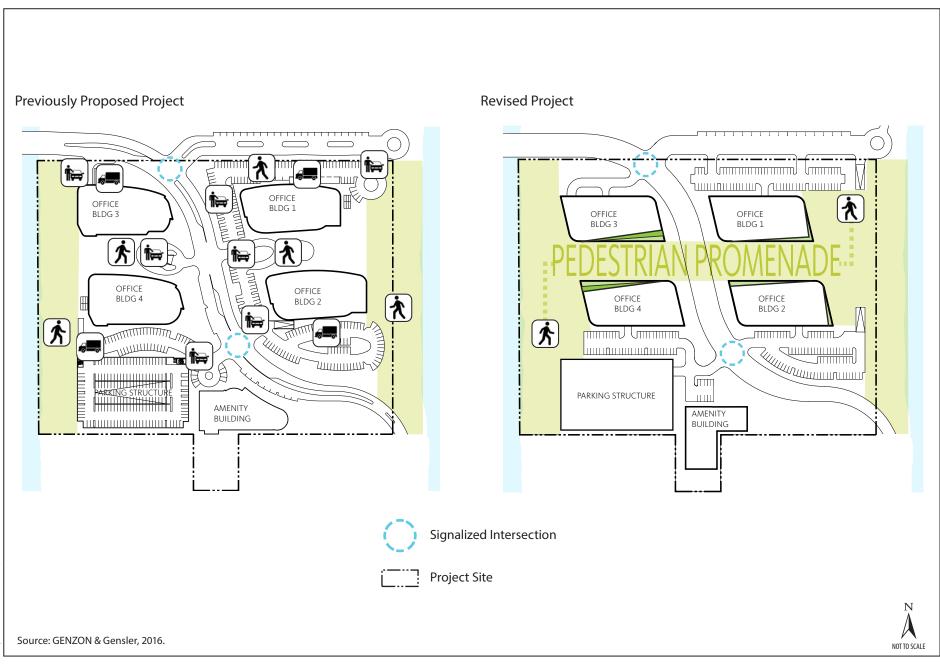
Revised Project



Source: GENZON & Gensler, 2016.



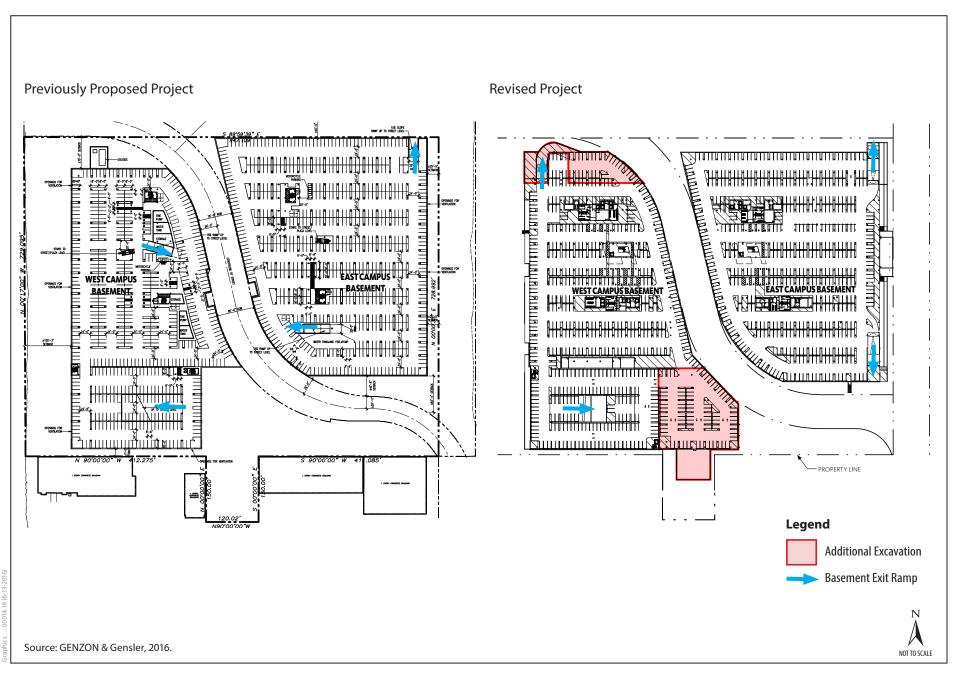
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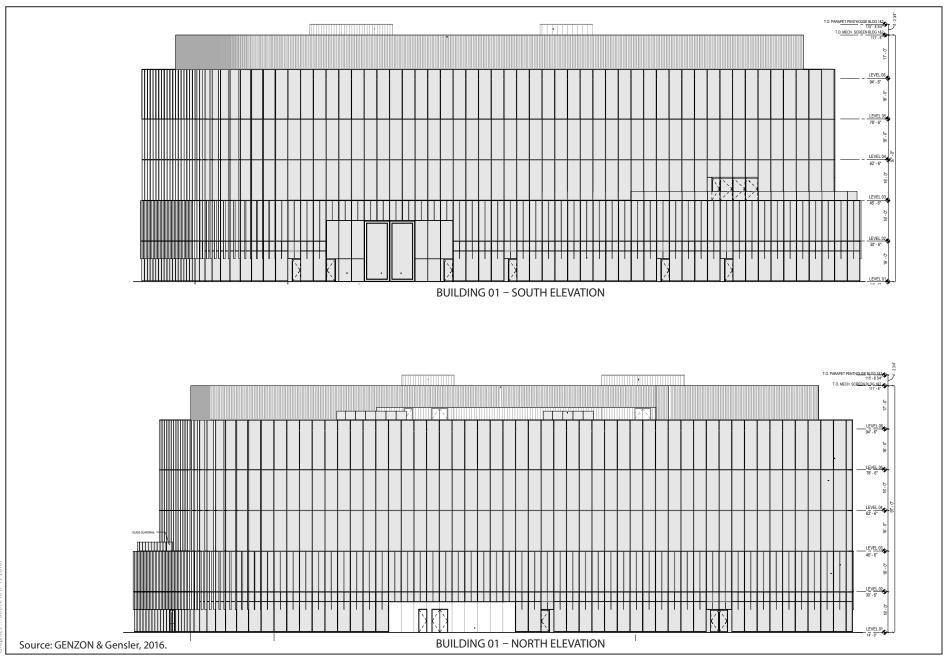




Figure 8
Building Elevations – Office
Burlingame Point Project EIR Addendum

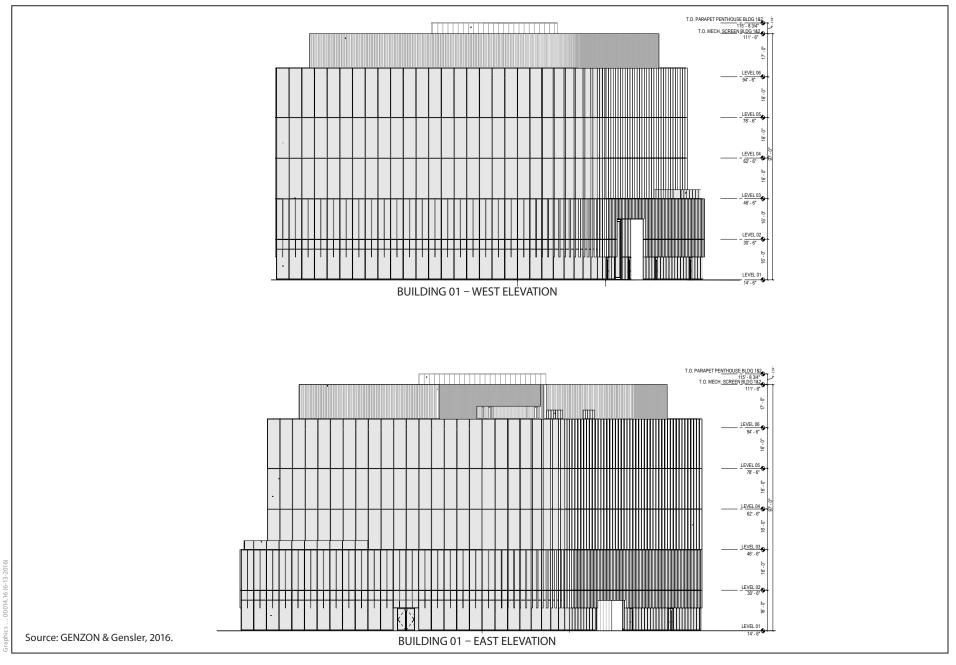
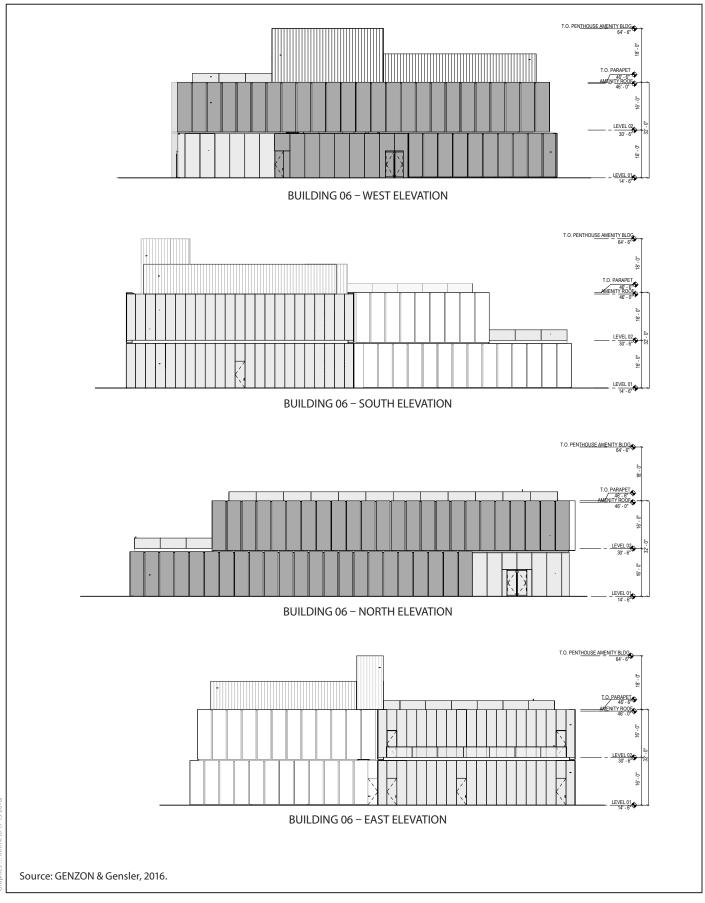
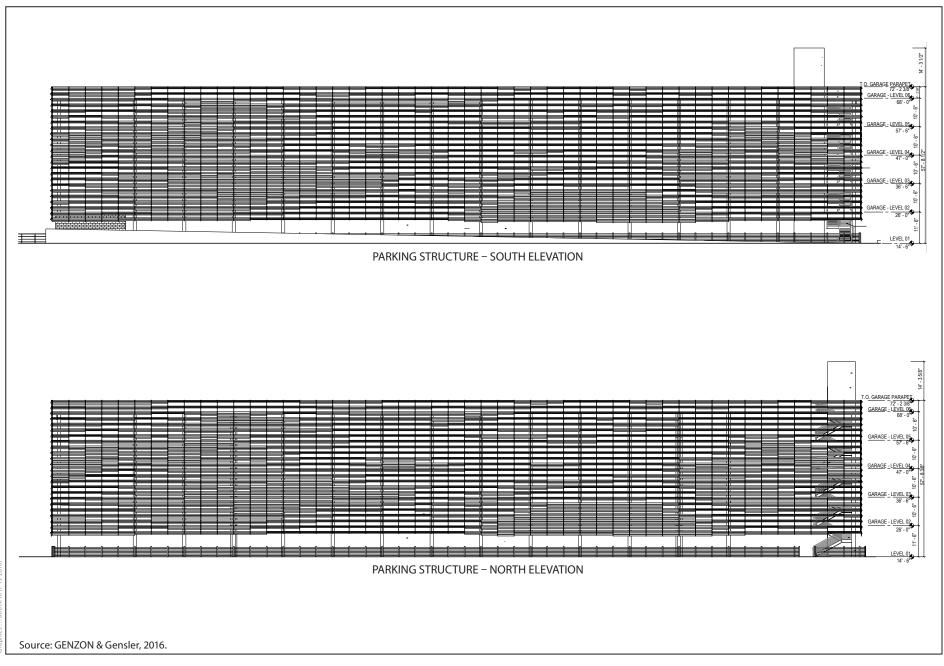




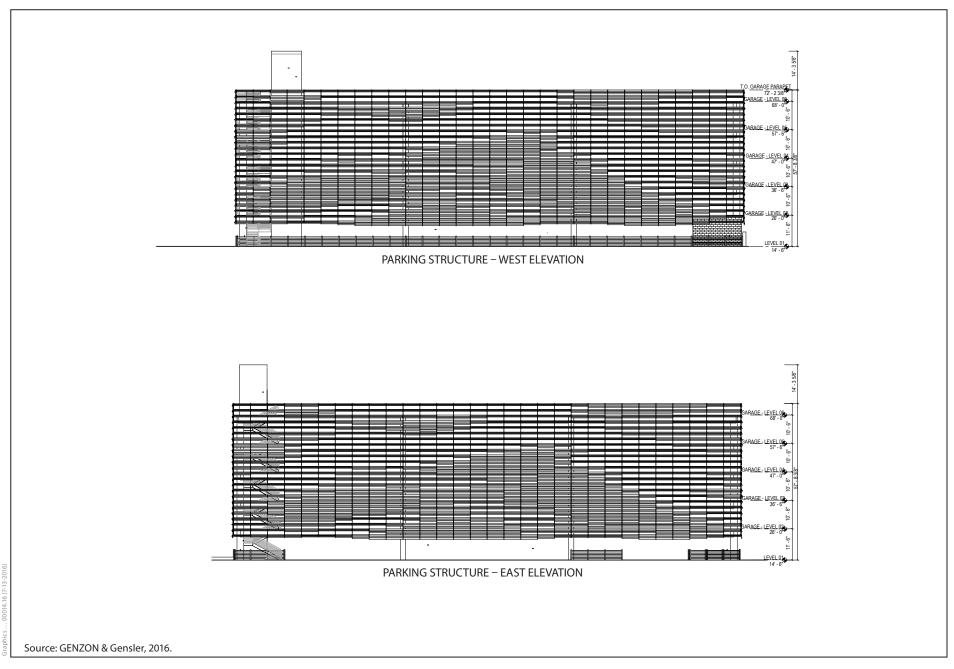
Figure 9
Building Elevations – Office
Burlingame Point Project EIR Addendum













3.1 Introduction to the Environmental Analysis

Organization of This Section

The purpose of the analysis is to compare the impacts of the Previously Proposed Project with the impacts of the Revised Project. For each environmental topic, this environmental analysis section provides a summary of impacts from the Previously Proposed Project, as discussed in the Environmental Impact Report (EIR) certified on June 18, 2012. This section also provides a discussion of the impacts under the Revised Project, identifies mitigation measures that would still apply to the Revised Project, and discusses the mitigation measures that would no longer apply to the Revised Project (if applicable).

Summary of Environmental Impacts

Table 3-1, below, summarizes the main conclusions for each environmental topic for both the Previously Proposed Project and the Revised Project. As indicated in the table, all but one impact conclusion in the certified Final EIR would remain the same for the Revised Project. Although some impacts would be slightly less or slightly greater than those of the Previously Proposed Project, the changes would be minor and would not affect the significance conclusions in the EIR. However, one mitigation measure proposed in the certified Final EIR for the Previously Proposed Project¹ is no longer required under the Revised Project, resulting in a lesser impact. As explained in Section 3.8 of this EIR Addendum, *Air Quality*, because construction under the Revised Project would occur during only one phase, sensitive receptors at the childcare center would not be present on the Project Site during the construction period. Therefore, health risks and risks related to exposure to construction-related particulate matter 2.5 microns in diameter or less (PM2.5) and toxic air contaminant (TAC) concentrations associated with the Revised Project would be below the regulatory thresholds, resulting in a less-than-significant impact. Mitigation Measure AQ-5.1, as required for the Previously Proposed Project, would not be required for the Revised Project.

3.2 Impacts Not to Be Evaluated

Introduction

Prior to release of the EIR for the Previously Proposed Project, an Initial Study (included in Appendix B of the EIR) was prepared to scope out the environmental impacts that were found to be less than significant. The Initial Study analyzed and scoped out the following environmental topics:

¹ As explained in Chapter 2, *Project Description*, the 300 Airport Boulevard Project EIR included 300 Airport Boulevard Project (Previously Proposed Project) and an adjacent undeveloped 8.58-acre area at 350 Airport Boulevard. The Burlingame Point Project encompasses only development at 300 Airport Boulevard. Therefore, this EIR addendum does not consider the impacts of the 350 Airport Boulevard Project or the mitigation measures proposed for the 350 Airport Boulevard Project only.

Table 3-1. Comparison of Impacts between the Previously Proposed Project and the Revised Project

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
Impacts Not to Be Evaluated			
Land Use			
Conflicts with Adopted Land Use Plans and Polices	LTS	LTS	0
Division of an Established Community	NI	NI	0
Cumulative Land Use Impacts	NI	NI	0
Biological Resources			
Effects on Sensitive Natural Communities	LTS	LTS	0
Loss of Wetlands and Other Waters of the United States	PS/LTS	PS/LTS	0
Loss of Nesting Migratory Birds	PS/LTS	PS/LTS	0
Protection of Biological Resources	LTS	LTS	0
Conflicts with Habitat Conservation Plans	NI	NI	0
Cumulative Biological Resource Impacts	S/LTS	PS/LTS	0
Cultural Resources			
Impacts on Historical Resources	NI	NI	0
Impacts on Archaeological Resources	PS/LTS	PS/LTS	0
Impacts on Paleontological Resource or Unique Geological Features	PS/LTS	PS/LTS	0
Disturbance of Human Remains	PS/LTS	PS/LTS	0
Hydrology			
Violation of Water Quality Standards or Waste Discharge Requirements	LTS	LTS	0
Construction-related Water Quality Degradation, Erosion, and Sedimentation	LTS	LTS	0
Operational Water Quality Degradation	LTS	LTS	0
Drainage Systems	LTS	LTS	0
Groundwater Supplies	LTS	LTS	0
100-year Flood Hazard	NI	NI	0
Sea-level Rise	PS/LTS	PS/LTS	0
Tidal and Wave Action Flooding	PS/LTS	PS/LTS	0
Cumulative Impacts	PS/LTS	PS/LTS	0
Geology and Soils			
Exposure to Rupture of Known Earthquake Fault	LTS	LTS	0
Exposure to Ground Shaking	LTS	LTS	0
Exposure to Seismically Related Ground Failure, Including Liquefaction	LTS	LTS	0
Exposure to Landslides	LTS	LTS	0
Substantial Soil Erosion or Loss of Topsoil	LTS	LTS	0
Exposure to Landslide, Lateral Spreading, Subsidence, Liquefaction or Collapse	LTS	LTS	0
Located on Expansive Soil	NI	NI	0
Septic Tanks or Alternative Waste Water Disposal Systems	NI	NI	0

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
Hazards and Hazardous Materials			
Significant Hazard through Routine Transport, Use, or Disposal of Hazardous Materials	LTS	LTS	0
Significant Hazard Due to a Release of Hazardous Materials into the Environment	LTS	LTS	0
Emit Hazardous Materials within 0.25 Mile of a School Located on a Hazardous Material Site or within 2 Miles of an Airport	NI	NI	0
Physically Interfere with an Adopted Emergency Response Plan or Emergency Evacuation Plan	LTS	LTS	0
Exposure to Wildland Fires	NI	NI	0
Population and Housing			
Population Growth	LTS	LTS	0
Cumulative Population and Housing Impacts	LTS	LTS	0
Public Services			
Impacts on Fire Protection	LTS	LTS	0
Impacts on Police Protection	LTS	LTS	0
Impacts on Schools	NI	NI	0
Impacts on Libraries	NI	NI	0
Utilities and Service Systems			
Water Supply and Facilities	LTS	LTS	0
Water Treatment Facilities	LTS	LTS	0
Wastewater Treatment Facilities	PS/LTS	PS/LTS	0
Stormwater Drainage Facilities	NI	NI	0
Cumulative Impacts	LTS	LTS	0
Agricultural, Forestry, and Mineral Resources			
Impacts on Agricultural Resources	NI	NI	0
Impacts on Forestry Resources	NI	NI	0
Impacts on Mineral Resources	NI	NI	0
Impacts to Be Evaluated			
Visual Quality			
Alteration of a Scenic Vista	LTS	LTS	0
Damage to Scenic Resources within a State Scenic Highway	NI	NI	0
Degradation of Existing Visual Character or Quality	LTS	LTS	0
New Sources of Light and Glare	LTS	LTS	0
Cumulative Visual Impacts	LTS	LTS	0
Transportation			
Intersection Operations	SU	SU	0
Freeway Ramp Operations	LTS	LTS	0
Freeway Segment Operations	SU	SU	0
Air Traffic Patterns	NI	NI	0

Environmental Issue	Previously Proposed Project	Revised Project	Change in Impact
Transit Service, Pedestrian Facilities, and Bicycle Facilities	LTS	LTS	0
Site Access, Circulation, and Parking	LTS	LTS	0
Cumulative Transportation Impacts	SU	SU	0
Air Quality			
Consistency with Applicable Air Quality Plans	SU	SU	0
Violation of Particulate Matter Ambient Air Quality Standards	PS/LTS	PS/LTS	0
Compliance with BAAQMD CEQA Significance Criteria Regarding Construction-related Criteria Air Pollutants and Ozone Precursor Emissions	SU	SU	0
Compliance with BAAQMD Significance Criteria (Operation)	SU	SU	0
Exposure of PM2.5 and TACs during Construction and Operation	PS/LTS	PS/LTS	_
CO Compliance with Ambient Air Quality Standards	LTS	LTS	0
Objectionable Odors	NI	NI	0
Cumulative Air Quality Impacts	SU	SU	0
Climate Change			
Generation of GHG Emissions	SU	SU	0
Conflict with Applicable GHG Plans, Policies, or Regulations	SU	SU	0
Noise			
Permanent Increase in Ambient Noise Levels during Construction	PS/LTS	PS/LTS	0
Exposure of Persons to Excessive Ground-borne Vibration Levels during Construction	S/LTS	S/LTS	0
Exposure of People to Excess Traffic Noise	LTS	LTS	0
Increase in Ambient Noise Levels during Operation	LTS	LTS	0
Airport Noise	LTS	LTS	0
Cumulative Noise Impacts	LTS	LTS	0
Parks and Wind Effects on Recreation			
Effects on Windsurfing and Kiteboarding Recreational Resources	LTS	LTS	0
Existing Recreational Facilities	LTS	LTS	0
Cumulative Parks and Wind Impacts	LTS	LTS	0
Notes: 0 = No Change in Impact — = Less Impact Compared to Previously Proposed Project	S = Signif	itially Signif Chan Signific	icant
BAAQMD = Bay Area Air Quality Management District CEQA = California Environmental Quality Act CO = carbon monoxide GHG = greenhouse gas			

agricultural/forestry resources, cultural resources, geology and soils, hazards and hazardous materials, mineral resources, and public services. The proposed design modifications to the Revised Project would not change the analysis of these topics, as presented in the Initial Study. In addition, the Revised Project would result in the same impacts for the following topics, which were analyzed in the EIR: land use, biological resources, hydrology, population and housing, and utilities. All impact conclusions and/or mitigation measures would be the same for these topics.

This section includes a summary of the findings in the EIR and explains why the impacts have not changed under the Revised Project.

Land Use, Plans, and Policies

Summary of Previously Proposed Project. As stated in the Initial Study, the Previously Proposed Project would not physically divide a community or conflict with any applicable habitat conservation plan or natural community conservation plan. As such, the certified Final EIR analyzed only the Previously Proposed Project's consistency with adopted land use plans and policies. Plans and regulations applicable to the project include the City of Burlingame (City) General Plan,² the Bayfront Specific Plan, the City of Burlingame Municipal Code, the City of Burlingame Bicycle Transportation Plan, the San Francisco Bay Conservation and Development Commission (BCDC) Bay Plan and Public Access Design Guidelines for the San Francisco Bay, the Association of Bay Area Governments (ABAG) Bay Trail Plan and Design Guidelines, and the San Mateo County Comprehensive Airport Land Use Plan (ALUP). The Previously Proposed Project would be generally consistent with the Bayfront Specific Plan goals and development policies, BCDC Public Access Design Guidelines, the ABAG San Francisco Bay Trail (Bay Trail) Plan and Design Guidelines, and the ALUP. In addition, the Previously Proposed Project would be consistent with the Coyote Point Recreation Area Master Plan and the City's Bicycle Transportation Plan within the City General Plan.

As described in the Bayfront Specific Plan, the majority of the Project Site falls within the Anza Point North (APN) zoning district, but a small portion of the Project Site falls within the Anza Point South (APS) zoning district. In each zoning district, the land use designation is Waterfront Commercial. However, although APN permits hotels, offices, restaurants, training facilities, commercial recreation, and publicly owned recreation areas, APS allows only office, manufacturing, recreation-related retail, service businesses, and publicly owned recreation facilities. The Previously Proposed Project would develop a swimming pool, a commercial recreation use, in the portion of the Project Site that is currently zoned as APS. Therefore, changing the zoning to APN is needed to include the entire Project Site in the APN zoning district and allow this commercial recreational component of the Previously Proposed Project. In addition, the Previously Proposed Project would amend the Bayfront Specific Plan and the APN zoning district to increase office uses from the currently allowed floor area ratio (FAR) of 0.6 to 1.0 and increase commercial recreation facilities from the currently allowed FAR of 0.5 to 1.0. Furthermore, amendments to the design guidelines of the Bayfront Specific Plan for the Anza Point subarea would be needed to allow for changes to required front and internal setbacks and the heights of buildings and to reflect the proposed roadway realignment through the Project Site. Adoption of these amendments would make the Previously Proposed Project consistent with the Bayfront Specific Plan, and impacts would be *less than significant*.

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² The City's Housing Element has been updated since the completion of the EIR. However, since the Project does not include housing, it is not necessary to discuss consistency with the Housing Element.

The buildings proposed for development under the Previously Proposed Project would be inconsistent with the FAR, height, and setbacks³ permitted under the City of Burlingame Municipal Code for APN zoning regulations. To provide adequate parking onsite, parking regulations for stall dimensions would need to be amended. The Project Sponsor would request amendments to the City Zoning Code regarding floor area, height, setbacks, and parking so that the Previously Proposed Project would be consistent with the zoning code.

Impacts of Revised Project. The Revised Project would include the same uses as the Previously Proposed Project. As such, the conclusions regarding division of an established community and consistency with Bayfront Specific Plan policies for the Previously Proposed Project would apply to the Revised Project. As with the Previously Proposed Project, the Revised Project would be generally consistent with the City General Plan, the Bayfront Specific Plan, BCDC Public Access Design Guidelines, the ABAG Bay Trail Plan and Design Guidelines, the ALUP, the Coyote Point Recreation Area Master Plan, and the Bicycle Transportation Plan.

When the Previously Proposed Project was approved in June 2012, the majority of land use entitlements, zoning amendments, and amendments to the Bayfront Specific Plan were approved. Although a final parcel map would still be required, the Revised Project would be consistent with the Bayfront Specific Plan land use designations and zoning regulations regarding FAR, setbacks, building heights, and parking. In addition, the entire Project Site is now within APN zoning, which now allows incidental food establishments and retail services in a business campus. Therefore, the Revised Project, similar to the Previously Proposed Project, would result in *less-than-significant* land use impacts. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

Biological Resources

Summary of Previously Proposed Project. The Project Site is located in an urbanized area, on a vacant lot along the San Francisco Bay (Bay) shoreline and near the outlet of Sanchez Lagoon, both of which offer habitat for plant species, migrating birds, and other wildlife. The vegetation communities of the Project Site are ruderal (weedy) or ornamental (remnant landscaping around the site perimeter). The bordering shorelines adjacent to the Project Site are artificial concrete and riprap. No sensitive natural communities occur within the Project Site. In combination with the urban history of the Project Site, these degraded or developed communities do not provide suitable habitat for special-status plant or animal species that might otherwise occur in suitable habitat of the Project Site vicinity. The Project Site does not contain any trees that are protected under any tree preservation policy or ordinance. Additionally, the Project Site does not provide ample habitat for trees that would be defined as protected trees by the City. As such, the Previously Proposed Project was found to have a less-than-significant impact on the protection of biological resources.

The Project Site was created using Bay fill and then developed as a drive-in movie theater, neither of which (i.e., site development or theater) is considered natural in origin. Consequently, there were no effects on sensitive natural communities. A series of channels and depressions that retain surface water for extended periods are located in the eastern and southern portion of the Project Site. These features support a variety of ruderal wetland plant species and, therefore, could be subject to the Clean Water

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³ The Previously Proposed Project would require amendments to only the front setbacks, shoreline setbacks, setbacks from the Project Site for below-grade construction, and parking setbacks. The other setbacks (side, rear, and distance between buildings) are consistent with the existing zoning code, and therefore, no amendments are required.

Act (CWA). In addition, fill activity associated with construction grading could require a permit from the U.S. Army Corps of Engineers and water quality certification from the Regional Water Quality Control Board.

MITIGATION MEASURES. As presented in the certified Final EIR, Mitigation Measures BR-2.1 and BR-2.2, *Conduct a Wetland Delineation* and *Obtain Applicable Permits and Certifications*, were applied to the Previously Proposed Project to account for its impact on any potential wetlands and other waters of the United States. These mitigation measures would reduce impacts to *less than significant with mitigation*.

The Previously Proposed Project would require tree and shrub removal, which could include potential nesting habitat for raptors and migratory birds. This could result in "take" associated with the direct mortality of adult or young birds, nest destruction, or disturbance of nesting native bird species (including migratory birds and other special-status species), resulting in nest abandonment and/or the loss of reproductive effort. Bird species are protected by both state (California Fish and Game Code Sections 3503 and 3513) and federal (Migratory Bird Treaty Act of 1918) laws.

MITIGATION MEASURES. Mitigation Measures BR-3.1 and BR-3.2, *Bird Nest Pre-Construction Survey* and *Bird Nest Buffer Zone*, as presented in the certified Final EIR, were applied to the Previously Proposed Project to reduce its impact on nesting migratory birds to *less than significant with mitigation*.

Impacts of Revised Project. An updated California Natural Diversity Database (CNDDB) query was submitted for the Revised Project. Compared with the 2011 CNDDB query for the Previously Proposed Project, the 2016 CNDDB query for the Project Site included 13 additional species. One of the 13 new species, marbled murrelet (*Brachyramphus marmoratus*), is federally threatened and state endangered. Marbled murrelet nests in old-growth coniferous forests, in trees greater than 200 years old. This habitat is not present at the Project Site. Other new species include Townsend's big-eared bat (*Corynorhinus townsendii*), a state candidate threatened species, and longfin smelt (*Spirinchus thaleichthys*), a federal candidate and state threatened species. These species are not expected to be present at the Project Site. There are no caves or human-made structures (e.g., old mine workings or buildings) for Townsend's big-eared bat to occupy for roosting, and the Project Site does not include aquatic habitat that could support longfin smelt. One species that was not federally or state listed at the time of the 2011 CNDDB query has become listed; Franciscan manzanita (*Arcotostaphylos franciscana*) was designated by the U.S. Fish and Wildlife Service as federally endangered on October 5, 2012. However, Franciscan manzanita is known only from a single individual in the San Francisco Presidio and not expected to be present at the Project Site.⁴

Because of the lack of native vegetation communities and the urban nature of the site's former uses, it is not expected that any of the known special-status species from the region would occur on the Project Site. Similar to the site for the Previously Proposed Project, the eastern and southern portions of the Project Site contain vegetated channels and depressions that support a variety of ruderal wetland plant species. Therefore, if construction were to occur along the eastern and western edges of the property, for elevations below 5.55 feet NGVD, the Revised Project would be subject to the CWA.⁵ The loss of vegetated features as a result of the Revised Project would be a potentially significant impact. In

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⁴ California Department of Fish and Wildlife. 2016. *California Natural Diversity Database – Selected Elements by Scientific Name*. April 1, 2016.

⁵ Hicks, Jane M. U.S. Army Corps of Engineers. December 6, 2012—letter to Michael Josselyn, WRA Environmental Consultants.

addition, the Revised Project would remove the same number of trees and shrubs from the Project Site as the Previously Proposed Project, resulting in *potentially significant* impacts on nesting migratory birds.

MITIGATION MEASURES. As presented in the certified Final EIR, Mitigation Measures BR-2.1 and BR-2.2, *Conduct a Wetland Delineation* and *Obtain Applicable Permits and Certifications*, would be applied to the Revised Project to account for its impact on any potential wetlands and other waters of the United States within the Project Site. In addition, Mitigation Measures BR-3.1 and BR-3.2, *Bird Nest Pre-Construction Survey* and *Bird Nest Buffer Zone*, as presented in the certified Final EIR, would be applied to the Revised Project to reduce its impact on nesting migratory birds. As such, the impacts on biological resources due to development of the Revised Project would be *less than significant with mitigation*. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

Cultural Resources

Summary of Previously Proposed Project. There are no existing structures on the Project Site. As such, the Previously Proposed Project would not require the demolition and disposal of existing buildings. In addition, there are no historic resources on or within 0.25 mile of the Project Site. Therefore, the Previously Proposed Project would result in no impact on historic resources. The Project Site is located on fill; therefore, the Project Site is a highly artificial environment that has very low archeological sensitivity. The cultural resources records search conducted for the Previously Proposed Project, as well as Native American correspondence, revealed no recorded Native American or historic-period archaeological sites within the Project Site. Nevertheless, because the Previously Proposed Project would require soil-disturbing activities during construction, impacts related to undiscovered archeological and paleontological resources and human remains could occur. If encountered during construction, archaeological resources, paleontological resources, and human remains could be damaged or destroyed, resulting in *potentially significant* impacts.

MITIGATION MEASURES. Mitigation Measures E-1, E-2, and E-3, *Undiscovered Cultural Resources*, *Unique Paleontological/Geological Features*, and *Human Remains*, as presented in the Initial Study, would reduce impacts on archaeological resources, paleontological resources, and human remains, respectively, to *less than significant with mitigation*.

Impacts of Revised Project. As with the Previously Proposed Project, there are no existing structures on the Project Site. Therefore, the Revised Project would not require the demolition or disposal of existing buildings at the Project Site. The Revised Project would involve the same maximum depth of excavation as the Previously Proposed Project. However, the Revised Project would require slightly more excavation for the increased basement area. As such, there is a minor increase in the likelihood of unearthing archaeological resources, paleontological resources, and human remains during construction of the Revised Project. Construction activities could damage these resources, resulting in **potentially significant** impacts.

MITIGATION MEASURES. Although the Revised Project would require additional excavation, the mitigation measures, as presented in the Initial Study (Mitigation Measures E-1, E-2, and E-3), would reduce the impacts on archaeological resources, paleontological resources, and human remains. The Revised Project would not result in additional impacts beyond those identified in the Initial Study, and impacts would be *less than significant with mitigation*.

Hydrology and Water Quality

Summary of Previously Proposed Project. Construction of the Previously Proposed Project would require a National Pollutant Discharge Elimination System (NPDES) Construction General Permit, development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), appropriate best management practices (BMPs), and other controls to minimize sediment and pollutants in construction site stormwater runoff. These controls, along with City Municipal Code sections pertaining to construction and stormwater management, would ensure that the Previously Proposed Project would reduce erosion and sediment transport during construction to the extent required by existing regulations, would not contribute additional sources of polluted runoff, or otherwise cause water quality degradation. As a result, the Previously Proposed Project's construction-related water quality impacts would be less than significant.

During operation, all stormwater runoff from the Previously Proposed Project would be routed through new and existing onsite storm drainage systems to existing offsite storm drains/channels. Stormwater is not conveyed to the City's piped drainage system but, rather, conveyed by a pump to Sanchez Channel, which flows into the Bay. By including appropriate source controls, site designs, BMPs, and stormwater treatment measures, the Previously Proposed Project would be in compliance with the standards and water quality protection measures imposed under the Municipal Regional Permit (MRP). Furthermore, the review and permitting processes would ensure that the Previously Proposed Project would not violate NPDES Municipal Stormwater Permit Waste Discharge Requirements (WDRs), permits, or water quality standards. Therefore, the impact would be less than significant. The Previously Proposed Project would be in compliance with the MRP and San Mateo Countywide Water Pollution Prevention Plan (SMCWPPP), Provision C.3, Stormwater Technical Guidance, which includes post-construction stormwater controls to help reduce long-term impacts on stormwater quality. BMPs identified for the Previously Proposed Project include stormwater retention and treatment areas. Therefore, operation of the Previously Proposed Project would not create or contribute runoff that would be an additional source of water quality degradation or result in substantial erosion or sedimentation onsite or offsite. The impact would be less than significant.

Approximately 89 percent of the Project Site is currently covered with impervious surfaces. The Previously Proposed Project would reduce impervious surfaces to 78 percent of the Project Site (an 11 percent reduction), reducing stormwater peak-flow runoff and the demand on the stormwater pump station. The roadway storm drain system would remain a City storm drain system and be realigned to follow the realigned Airport Boulevard, draining into Sanchez Channel through existing outfalls. The existing outfall from the private storm drain pump may be maintained to drain portions of the open space and podium areas. In addition, a reduction in peak flows, as well as required BMPs, is included in the design of the Previously Proposed Project, ensuring that capacity would not be exceeded and no additional sources of polluted runoff would occur. Impacts would be less than significant. The City's sole source of potable water is the San Francisco Public Utilities Commission (SFPUC) Regional Water System, which obtains its water supply predominately from Hetch Hetchy Reservoir. Excavation depth during construction of the Previously Proposed Project would vary from 0 to 7.5 feet from the finished floor of the basement garage, with the maximum excavation at an elevation of 5.5 feet below sea level. Although some dewatering of subgrade features is anticipated during construction, dewatering would be temporary and should not have a substantial adverse effect on surface water/groundwater interactions. Therefore, the Previously Proposed Project would have a less-than-significant impact on groundwater supplies.

Sanchez Channel is the only 100-year flood hazard zone in the vicinity of the Project Site. A 100-foot setback between Sanchez Channel and the developed portions of the Previously Proposed Project, as well as Bay Trail and open space improvements, would be created, but permanent structures would not modify Sanchez Channel or be placed in the flood hazard zone of Sanchez Channel. The floodway and floodplain would not be affected, resulting in no impact. The majority of the Project Site is located within Zone X (shaded), between the 100- and 500-year flood zones. These areas are of moderate flood hazard and not considered to be within the Special Flood Hazard Area (SFHA).

Sea-level rise could increase the frequency of flood events, reduce stormflow conveyance capacities, and create more stress on the shoreline and flood protection features. The Project Site is currently protected from flooding by a shoreline barrier. Because the site elevation and finished floors at the Project Site would be above the expected 100-year peak tide elevation, substantial flood risks for people and aboveground structures are not expected. However, underground structures could be subject to flooding from an increased volume of water in the shallow groundwater table, the storm drain system may be subject to backwater effects and reduced conveyance capacity, and structures and embankments may not be designed to protect against higher tides adequately. In addition, when the Project Site was filled, the shoreline barriers were not properly engineered to prevent erosion. Maximum wave heights during high tides and 100-year tides have the potential to flood the Project Site. People and structures could be exposed to increased risk from flooding and erosion hazards through the development of new buildings, an inadequate storm drain system, and the eroded perimeter barriers, which were not designed to withstand the higher dynamic forces associated with higher tides. These would be *potentially significant* impacts.

MITIGATION MEASURES. Although the Previously Proposed Project could result in impacts related to sea-level rise and tidal and wave-action flooding, the mitigation measures presented in the certified Final EIR (Mitigation Measures HY-7.1, HY-7.2, HY-7.3, and HY-7.4) would reduce these impacts. The Previously Proposed Project would not result in additional impacts beyond those identified in the certified Final EIR, and impacts would be *less than significant with mitigation*.

Impacts of Revised Project. As with the Previously Proposed Project, compliance with applicable federal, state, and local regulations during construction and operation of the Revised Project would ensure that the Revised Project would not violate water quality standards, permits, or WDRs. A SWPPP would be developed and implemented, and BMPs would minimize sediment and pollutants in construction site stormwater runoff. In addition, the Revised Project would comply with the NPDES Construction General Permit, City Municipal Code pertaining to construction and stormwater management, and other applicable regulations and controls, ensuring that the Revised Project would reduce erosion and sediment transport that would otherwise cause water quality degradation. As such, impacts related to water quality standards, WDRs, water quality degradation, erosion, sedimentation, and the City's drainage system would be less than significant. The Revised Project would include a basement garage; however, similar to the Previously Proposed Project, the only 100-year flood hazard zone in the vicinity of the Project Site is confined to Sanchez Channel. The Revised Project would not place a structure within a SFHA, resulting in no impact.

The Revised Project would place structures on the Project Site that would be similar in size to those proposed under the Previously Proposed Project. However, surface parking under the Revised Project would total 88,500 gross square feet (gsf) compared with 114,000 gsf under the Previously Proposed Project, resulting in a 22 percent reduction in asphalt surface parking and creating more open green space. After completion of the Revised Project, impervious surfaces would cover approximately 70 percent of the Project Site, which is less than the Previously Proposed Project. Impervious areas include

roadways, parking areas, and rooftops. The Revised Project would include a stormwater retention zone to store and treat stormwater runoff from sidewalks and other areas. The same urban pollutants that would be generated under the Previously Proposed Project would be generated in stormwater runoff under the Revised Project. The City is responsible for enforcing and monitoring compliance with the SMCWPPP and overseeing the use of BMPs, as incorporated into the design of the Revised Project. Operations at the Project Site would be in compliance with applicable permits. To ensure that the Revised Project would not contribute additional sources of polluted runoff or otherwise degrade surface water quality, BMPs would be implemented to reduce stormwater pollutants and runoff.

Groundwater at the Project Site is shallow, and excavation during construction of subgrade features would most likely reach groundwater, requiring some dewatering. However, this would be a temporary impact because groundwater is not a source of supply or recharge, and dewatering would not have a significant impact on surface water/groundwater interactions. This would not adversely affect groundwater supplies because Burlingame's sole source of potable water is the SFPUC Regional Water System, which obtains approximately 85 percent of its water supply from the Hetch Hetchy Reservoir.

Therefore, there would be less-than-significant impacts related to water quality degradation, erosion, sedimentation, and groundwater recharge and supply. However, the Revised Project would expose approximately the same number of persons to the risk of flooding from sea-level rise as the Previously Proposed Project. As such, impacts related to sea-level rise and flooding would be *potentially significant*.⁶

MITIGATION MEASURES. Although the Revised Project could result in impacts related to sea-level rise and tidal and wave-action flooding, the mitigation measures presented in the certified Final EIR (Mitigation Measures HY-7.1, HY-7.2, HY-7.3, and HY-7.4) would reduce the impacts. The Previously Proposed Project would not result in additional impacts beyond those identified in the Initial Study, and impacts would be *less than significant with mitigation*.

Geology and Soils

Summary of Previously Proposed Project. The Project Site is not in a designated Alquist-Priolo Earthquake Fault Zone, and thus, the Previously Proposed Project would not be expected to expose people to significant impacts caused by the rupture of a known fault. The Project Site would be served by sewer mains used for wastewater disposal. Because the Project Site is in a seismically active region, the potential for seismically related ground failure exists. In addition, new development at the Project Site would expose approximately 2,475 new workers to ground shaking. Development under the Previously Proposed Project would be required to comply with the construction standards and seismic design criteria contained in the California Building Code (CBC), as adopted by the City. A geotechnical investigation was conducted at the Project Site, providing the analysis and recommendations required by the City Building Code prior to the building permit being issued. Compliance with the City Building Code would reduce potential liquefaction hazards to a less-than-significant level. The Project Site is relatively flat, with no steep or unstable adjacent slopes. In addition, grading activities would comply

The California Supreme Court recently concluded in the *California Building Industry Association vs. Bay Area Air Quality Management District (CBIA v. BAAQMD)* case that the California Environmental Quality Act (CEQA) "generally does not require an analysis of how existing environmental conditions will affect a project's future users or residents." Therefore, given the conclusions of the *CBIA v. BAAQMD* case, the exposure of Project users to flooding and sea-level rise would not be considered an impact under CEQA. Although the mitigation measure for the Previously Proposed Project may no longer be required, the Revised Project will still adhere to the mitigation measures related to sea-level rise and tidal/wave-action flooding to maintain consistency with the certified Final EIR.

with the CBC. Therefore, the Previously Proposed Project would have no impact related to landslide hazards. To prevent soil erosion, the Previously Proposed Project would implement drainage and erosion control features during construction, and approved landscape and irrigation plans would be implemented after construction. The Previously Proposed Project would conform to City grading requirements, which include obtaining a grading permit and plot plans drawn by a licensed civil engineer, architect, or land surveyor that show the location and contours of existing and proposed structures, streets, driveways, and easements. If the grading permit is part of the building permit application, then the plot plans will show the proposed building elevations above and below grade and the proposed disposition of surface drainage on the site. Furthermore, the Previously Proposed Project would conform to the San Mateo County Stormwater Management Plan to further prevent substantial soil erosion. The Previously Proposed Project would comply with the CBC during excavation activities and the Regional Water Quality Control Board or the local sanitation district during potential dewatering activities. Compliance during excavation and potential dewatering activities would reduce impacts associated with soil and slope instability, subsidence, or expansive, liquefiable, or collapsible soils. In addition, the Previously Proposed Project would adhere to CBC requirements regarding soils and/or geologic materials that support building foundations. Therefore, the Previously Proposed Project would result in *less-than-significant* impacts related to geology and soils.

Impacts of Revised Project. With respect to rupture of a known earthquake fault, exposure of people to seismically related ground shaking and ground failure, soil hazards, and soil erosion, the Revised Project would result in the same less-than-significant impacts as the Previously Proposed Project. Adherence to the City Building Code would ensure the maximum practicable protection from soil failures. In addition, compliance with City requirements and the CBC would ensure that soil erosion impacts resulting from Revised Project construction would be minimized. As such, no additional impacts related to geology and soils, beyond those identified in the Initial Study, would occur, resulting in *less-than-significant* impacts.

Hazards and Hazardous Materials

Summary of Previously Proposed Project. A Phase I Environmental Site Assessment (ESA) was performed by Treadwell & Rollo, which determined that no sensitive receptors exist within a 0.25-mile radius of the Project Site. Additionally, there are no National Priority List sites, oil and gas pipelines, active landfill sites, or Department of Defense sites within a 1-mile radius of the Project Site. An Environmental Data Resources (EDR) database search was conducted to identify recognized hazardous materials conditions related to current and past land uses. Further review of hazardous materials files at the Burlingame Fire Department and the San Mateo County Department of Health Services did not recover any listings for the Project Site.

The Previously Proposed Project would not involve the demolition of existing buildings, thereby eliminating the potential to expose construction workers or the public to hazardous building materials such as asbestos, polychlorinated biphenyls, lead, and mercury. However, the Previously Proposed Project would require construction activities that could result in spills or leaks of hazardous materials. As such, worker exposure during building construction could occur. Therefore, the Project Sponsor would be required to manage all hazardous materials pursuant to regulations of the San Mateo County Environmental Health Department and the Burlingame Fire Department, reducing potential impacts to a less-than-significant level.

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⁷ City of Burlingame. Burlingame Municipal Code. Title 18, Chapter 18.20.030 Requirements for grading permits. Available: http://qcode.us/codes/burlingame/?view=desktop&topic=25-25_60-25_60_010. Accessed: April 21, 2016.

The Previously Proposed Project would develop office uses or life science uses, either of which could result in hazardous material releases from landscaping maintenance, routine use of minor quantities of chemicals, or the use and storage of various laboratory chemicals and hazardous materials. However, hazardous materials releases during operation of the Previously Proposed Project would be minor, and impacts on the public or the environment from the transport, use, handling, and/or accidental release of hazardous materials would be less than significant. because the Project Site is not located within 0.25 mile of an existing or proposed school, the Previously Proposed Project would have no impact related to the emission or handling of hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school.

The surrounding land uses include various office and commercial properties as well as open space and recreational uses at Coyote Point Recreation Area. The Bay separates the Project Site from Coyote Point Recreation Area quasi-wildlands, thereby eliminating the risk for wildland fires. The Project Site is located approximately 2 miles southeast of San Francisco International Airport but is not in proximity to a private airstrip. The San Mateo County Comprehensive ALUP sets a height restriction for the Project Site of 300 feet above mean sea level (msl). Taking the Project Site's elevation into consideration, the tallest building at the Project Site would be approximately 144 feet above the proposed Airport Boulevard realignment and 158 feet above msl, thereby complying with the height restrictions set forth by the ALUP. The City has not adopted an Emergency Response or Emergency Evacuation Plan. El Camino Real, located approximately 2.5 miles south of the Project Site, could serve as an emergency evacuation route. Given the distance between the Project Site and El Camino Real, the Previously Proposed Project would not encroach on El Camino Real, resulting in a less-than-significant impact on emergency response or evacuation plans. Therefore, the Previously Proposed Project would result in a *less-than-significant* impact with regard to hazards and hazardous materials.

Impacts of Revised Project. Similar to the Previously Proposed Project, the Revised Project would not involve the demolition of existing buildings, and the Project Sponsor would be required to manage all hazardous materials, pursuant to regulations of the San Mateo County Environmental Health Department and the Burlingame Fire Department. In addition, the Revised Project would develop office and life science uses, which could result in hazardous materials releases during operation of the Revised Project. The Revised Project could result in routine use of minor quantities of chemicals (e.g., paints, cleaning solvents, ammonia) that are associated with normal office uses. Through consumer compliance with label warnings and storage recommendations from individual manufacturers, these hazardous materials would not pose any greater risk to the public or the environment. In addition, landscape maintenance would require minor quantities of pesticides and herbicides, and automobiles would occasionally leak limited quantities of petroleum hydrocarbons or oil and grease in the parking lot area. However, these releases would be minor, and impacts on the public or the environment from the transport, use, handling, and/or accidental release of hazardous materials would be less than significant. Similar to the Previously Proposed Project, the Revised Project would have less-than-significant impacts related to schools, wildland fires, ALUP height restrictions, and emergency evacuation routes. Therefore, the Revised Project would result in a less-than-significant impact with regard to hazards and hazardous materials. The Revised Project would not result in any impacts beyond those identified in the Initial Study.

Population and Housing

Summary of Previously Proposed Project. The Project Site is currently vacant. Therefore, construction of the Previously Proposed Project would not displace housing or people, which would require the construction of housing elsewhere. The Previously Proposed Project would not include development of new housing units and, therefore, would not directly increase the residential population within the region. However, there would be an indirect population increase associated with new employment during construction and operation. During construction, there would be a temporary increase in construction employment. However, this temporary construction employment would most likely be met within the existing and future labor market in the City and in San Mateo County.

Assuming the Previously Proposed Project would develop office uses only,⁸ up to 2,475 net new workers would be employed at the Project Site. As such, the Previously Proposed Project would increase the daytime population at the Project Site. Under a conservative scenario, with all 2,475 new employees coming from outside Burlingame, the Previously Proposed Project would create additional demand for approximately 1,115 housing units (at the current ratio of 2.22 persons per household), which could result in 1,115 additional households in the city. However, this is assuming a conservative scenario; it is unlikely that all the new employees would come from outside the city or that all would seek housing within the city. The Previously Proposed Project would result in *less-than-significant* impacts on population and housing growth.

Impacts of Revised Project. Although the distribution of uses on the Project Site has changed slightly with the Revised Project, there would be no additional impacts beyond those identified in the certified Final EIR, and the population and housing conclusions in the certified Final EIR would still apply. The Revised Project would develop three buildings with office uses; the remaining building would be developed with life science uses. However, for purposes of the analysis, it is conservatively assumed that all buildings would be developed with office uses (as assumed for the Previously Proposed Project). Under the Revised Project, office, office conference space, and food service uses would increase compared with the Previously Proposed Project, while retail and amenities uses (i.e., childcare and fitness center) would decrease. Regardless, the Revised Project would generate approximately 2,475 employees, which is the same number of employees that would be generated by the Previously Proposed Project. Therefore, the Revised Project would result in the same number of new households within the region and represent the same percentage of growth in projected housing demand. As presented in the certified Final EIR, the person-per-household (pph) ratio used for the city was 2.22. Although the city's current ratio has increased to 2.3 pph,9 the Revised Project would result in a population increase similar to that of the Previously Proposed Project and would not induce substantial population growth in the city or region. As such, the Revised Project would not induce substantial population growth indirectly through job growth and would not have direct impacts on the physical environment, resulting in a *less-than-significant* impact. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

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 $^{^{\}rm 8}~$ The most conservative assumption, as compared to life science uses.

⁹ City of Burlingame. 2015. *2015–2023 Housing Element*. Adopted January 5. Available: https://www.burlingame.org/modules/showdocument.aspx?documentid=11658. Accessed: January 27, 2016.

Public Services

Summary of Previously Proposed Project. The Previously Proposed Project would not add new residents to the Project Site directly. However, the Previously Proposed Project would require an increased level of police and fire services because of increased employment and onsite activity. With more onsite activity, there could be more incidents that would require police and fire response. However, the increased level of police and fire services would not be large enough to trigger the need for construction of new or expanded facilities, which could adversely affect the physical environment or affect human health and safety. The Previously Proposed Project would realign Airport Boulevard to bisect the Project Site, thereby changing traffic patterns to account for bicyclists and pedestrians. As such, emergency access to the Project Site could be affected. However, it is unlikely that the increase in the daytime population at the Project Site would affect police and fire response times to the extent that they would fall below existing standards.

Because the Previously Proposed Project would not involve the construction of new residential units in the city, it would not directly generate students. Nonetheless, the Previously Proposed Project would indirectly generate student demand from the induced housing resulting from increased employment. Although the Previously Proposed Project would accommodate office uses, it most likely would not induce a substantial number of new residents to the city, including children who would attend schools administered by the Burlingame School District (BSD) or San Mateo Union High School District (SMUHSD). As such, the Project would not place an additional burden on either BSD or SMUHSD.

The Previously Proposed Project would add employees to the Project Site who could use City libraries. However, there are no library services in the Bayfront Specific Plan area; therefore, employees would not be expected to use a City library before or after work or during lunch breaks. In addition, no new residential uses are proposed as part of the Project. Therefore, because the Previously Proposed Project would not trigger the need for the construction of new fire, police, school, or library facilities, the impacts would be *less than significant*.

Impacts of Revised Project. The Revised Project would generate the same number of employees as the Previously Proposed Project (approximately 2,475). As such, the Revised Project would demand the same amount of public services as the Previously Proposed Project. The Revised Project would include the same number of parking stalls, and traffic conditions would not change. Local roadways would not be further affected, and police and fire response times would be the same as those analyzed for the Previously Proposed Project. There would be no additional fire, police, school, or library impacts beyond those identified in the Initial Study.

Similar to the Previously Proposed Project, the Revised Project would realign Airport Boulevard to bisect the Project Site. The Revised Project would include minor changes to existing emergency access routes, but these changes would have a less-than-significant impact. Therefore, impacts on fire services, police services, schools, and libraries would be *less than significant* under the Revised Project, similar to the Previously Proposed Project.

Utilities and Service Systems

Summary of Previously Proposed Project. The City uses approximately 75.3 percent of its Individual Supply Guarantee (ISG). The Previously Proposed Project would require about 14 percent¹⁰ of the City's potable water. During normal years, the City would have a sufficient water supply to serve the Previously Proposed Project between 2011 and 2035. However, SFPUC would be unable to meet the Previously Proposed Project's demand under specific dry-year conditions. The City's 2010 Urban Water Management Plan (UWMP)¹¹ would ensure that supply curtailments and subsequent stages of demand reductions would balance demand (including that of the Previously Proposed Project) against curtailed supplies. Additionally, compliance with Senate Bill x7-7¹² and active planning efforts by the Bay Area Water Supply and Conservation Agency (BAWSCA) would reduce water demand. The Previously Proposed Project's water supply design specifications would comply with the City's standards regarding requirements for the design and operation of water distribution facilities. Final approvals from the City would be necessary prior to delivery of water to the Project Site.

Construction of the Previously Proposed Project would involve the removal of existing impervious surface cover (e.g. asphalt and concrete) and require excavation, consisting of approximately 75,000 cubic yards of mass excavated material. About 40,000 cubic yards of the excavated material would be exported offsite; the remaining excavated material would be used as backfill or grading material in landscaped areas within the Project Site. The Previously Proposed Project would be subject to the City's construction and demolition waste recycling requirement; such activities would be required to comply with federal, state, and local statutes and regulations governing solid waste. Therefore, preparation of the undeveloped site and construction of the project would have less-than-significant impacts on landfills.

The City's Waste Water Treatment Plant (WWTP) operates below capacity under dry-weather conditions. The Previously Proposed Project's increase to existing wastewater volumes would be slight. Although the WWTP would be able to accommodate the projected wastewater volume generated by the Previously Proposed Project, the increased peak wet-weather flow (PWWF) would require mitigation to increase capacity and reduce potential impacts on the pump station. It is anticipated that only the pumps and controller would need to be upgraded to increase capacity for PWWF; no improvements would need to be made to the pump station itself. Basins 2 and 6, which are within the City's jurisdiction, would be rehabilitated in conjunction with buildout of the Previously Proposed Project to balance the increased flows that would be entering the WWTP. Each basin's mains, manholes, and lower laterals would be rehabilitated, resulting in reduced PWWF to the WWTP at Basins 2 and 6. Therefore, the Previously Proposed Project would require expansion and rehabilitation of existing wastewater infrastructure. This would result in a **potentially significant** impact on the City's wastewater system.

¹⁰ Impacts on utilities and service systems were evaluated using the life sciences building scenario, which generally uses more utilities than office uses, to ensure a conservative analysis.

¹¹ The City is in the process of updating the UWMP. A public review draft of the 2015 UWMP for the City was released in May 2016. Adoption of the 2015 UWMP is pending.

¹² This bill, enacted in November 2009, requires all water suppliers to increase water use efficiency in two primary sectors, Urban Water Conservation and Agricultural Water Conservation. The bill requires, among other things, that the Department of Water Resources, in consultation with other state agencies, develop a single standardized water use reporting form, which would be used by both urban and agricultural water agencies.

MITIGATION MEASURES. Mitigation Measure UT-3.1 (Upgrade Pump Capacity at the Existing 399 Rollins Road Pump Station and Reduce Inflow and Infiltration within the Wastewater System) would reduce the Previously Proposed Project's potentially significant impact on the City's wastewater conveyance and treatment system to *less than significant with mitigation*.

Impacts of Revised Project. Similar to the Previously Proposed Project, the Revised Project would increase building density at the currently undeveloped Project Site. Construction of the Revised Project would consist of approximately 77,250 cubic yards of mass excavated material. During construction, approximately 32,400 cubic yards of soil would be exported offsite, which is slightly less excavation waste compared with the Previously Proposed Project. Therefore, impacts on landfills would still be less than significant. For the purposes of the utilities analysis for the Previously Proposed Project, it was assumed that the Project Site would be developed with all life sciences uses, ensuring a conservative analysis. However, the Revised Project would most likely develop three buildings for office uses and one building for life sciences uses. Office uses would result in less water demand than life science uses; therefore, it is anticipated that the Revised Project's impact on water and wastewater infrastructure would be less than that of the Previously Proposed Project. Regardless, the Revised Project's impact is considered to be *potentially significant*.

MITIGATION MEASURES. Although the Revised Project would develop fewer life sciences buildings, Mitigation Measure UT-3.1 would reduce the Revised Project's potentially significant impact on the City's wastewater conveyance and treatment system to *less than significant with mitigation*. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

Agricultural, Forestry, and Mineral Resources

Based on knowledge of the Project Site and its surrounding areas, a determination was made in the Initial Study for the Previously Proposed Project that there would be no project-related impacts on agricultural, forestry, or mineral resources because none are present in the vicinity. The same conclusion of **no impact** applies to the Revised Project.

3.3 Topics Requiring Additional Analysis

Visual Quality

Summary of Previously Proposed Project

VQ-1: Alteration of Scenic Vistas. The Previously Proposed Project would increase massing, height, and bulk considerably compared with existing conditions. Existing views from the Coyote Point Recreation Area/San Francisco Bay Trail (Bay Trail) include broad views of the San Francisco Bay (Bay) and relatively unobstructed views of the higher portions of the Santa Cruz Mountains. Given the relatively natural setting and the high quality of the views from this location, and that the area is open to the public, views of the Bay, the San Francisco skyline, the East Bay Hills, and the Santa Cruz Mountains from this vantage point are considered scenic vistas. Although the Project Site is visible from surrounding locations, none of these areas, other than Coyote Point Recreation Area, are considered scenic vistas because of their location and limited views of significant landscape features.

As shown in Figure 13, Buildings B1 and B2 and the amenities center would be visible from the Coyote Point Recreation Area; the taller buildings would partially obscure the remaining view of the ridgeline of the Santa Cruz Mountains. In addition, Building B3 and the parking structure would be partially visible from the Coyote Point Recreation Area. As such, the four office/life science buildings and the multi-level parking structure at the Project Site would interrupt existing views of the Coyote Point Recreation Area. However, this increased development would represent a small portion of the overall vista. Existing development located west of the Project Site is similar in size and scale to the proposed buildings. Therefore, the ridgeline of the Santa Cruz Mountains would be unobstructed, even with development of the Previously Proposed Project.

Although ridgeline views would be blocked by the office/life science buildings from this location, other vantage points in the Coyote Point Recreation Area, such as the overlook on the bluff trail to the east, would have slightly different view corridors, with less of the view blocked by development. In addition, it is important to note that the views of the Project Site change as the viewer adjusts position. As the viewer approaches the Project Site along the Bay Trail, the development would appear large and would block different background views. However, the proposed buildings would appear smaller against the backdrop of the hills as the viewer moves away from the Project Site. From the tree-covered point of Coyote Point, the ridgeline of the Santa Cruz Mountains would be unobstructed, even with development of the Previously Proposed Project. As such, although the proposed height and massing at the Project Site would increase, this would represent an insignificant part of the overall view available from this location. The Previously Proposed Project would have a *less-than-significant* impact on scenic vistas from the Coyote Point Recreation Area.

VQ-2: Damage to Scenic Resources within a State Scenic Highway. The Project Site is not located adjacent to, or in view of, a designated state scenic highway or corridor. The closest designated scenic highway is Interstate 280 (I-280), which is more than 3 miles west of the Project Site. No portion of the Project Site can be seen from I-280. Therefore, there would be **no impact** related to scenic resources adjacent to, or in view of, a state scenic highway.

VQ-3: Degradation of Existing Visual Character or Quality. The Project Site currently consists of a vacant lot, with cracked paved surfaces, dirt mounds, and ruderal weeds and shrubs. As such, the Project Site does not currently represent a visually significant area. In addition, the vacant parcel is not







Sources: Atkins, 2011 and Genlser, 2016.



consistent with its surroundings and does not provide unity between the natural setting of the Bay to the east, the light-industrial buildings to the south, or the office development to the west. The Previously Proposed Project would replace the vacant site with new buildings, enhanced landscaping, and bicycle/pedestrian amenities. The Previously Proposed Project would develop buildings ranging from 48.5 to 144 feet in height, which would substantially increase building mass and alter the visual character of the Anza Point subarea. In addition, this change in visual character would result in a more cohesive visual pattern, which is encouraged by the City of Burlingame (City) through the policies and design guidelines contained in the Bayfront Specific Plan. Development under the Previously Proposed Project would provide increased unity with the surroundings by creating contiguous landscape areas and buildings that would reflect a similar architectural design. The buildings would provide design continuity with the office complex to the west, while the open spaces, vegetation, and revitalized Bay Trails would provide visual connections to the Bay.

As shown in Figure 14, the northbound Peninsula Avenue/US 101 onramp includes unobstructed views of the Project Site, with San Bruno Mountain visible in the background. All the Previously Proposed Project buildings would be visible to varying degrees from the onramp. However, the proposed landscaping, which would be visible along the eastern perimeter, would soften the Previously Proposed Project's appearance and reduce its visual contrast with the surrounding landscape. Figure 15 depicts the Project Site from southbound US 101. Existing views of the Project Site from this location are highly channelized, and background views of the East Bay Hills are visible only on clear days. The Previously Proposed Project would add height, mass, and bulk to the view from this location and become the dominant visual feature. However, motorists on northbound and southbound US 101 have only fleeting views of the Project Site because of the speeds that are permitted and the fact that users of US 101 typically direct their attention to the freeway ahead rather than views from the freeway. Therefore, the views of the Project Site from US 101 do not constitute sensitive views, and motorists on US 101 are not considered sensitive viewers. Furthermore, direct views of the Project Site are partially blocked by other freeway lanes, other motorists, freeway barriers, and overhead utility lines.

The Previously Proposed Project would comply with the City's design review process and landscaping standards, ensuring that future development would be visually compatible with the character of the surrounding area. Therefore, the Previously Proposed Project would not substantially degrade the existing visual character or quality of the site or the area, and the impact would be *less than significant*.

VQ-4: New Sources of Light and Glare. There is currently no lighting at the Project Site. The Project Site is highly visible from US 101, and lights from vehicles and exterior lighting used at buildings could be nuisance or distraction for motorists. In addition, the Previously Proposed Project would include pedestrian lighting, bollard lighting along the Bay Trail, and in-ground drive-over lights along the vehicle drop-off areas. However, lighting would be designed to meet the requirements of Municipal Code Section 18.16.030 to prevent light spillage offsite. Under the Previously Proposed Project, buildings would include glass-fiber reinforced concrete panels, natural stone veneers, prefinished metal panels, and high-performance tinted glazing; reflective or dark tinted glass would not be used. The proposed buildings would also include aluminum-blade sunshades, prefinished metal panels, aluminum storefronts, pre-finished metal canopies with panel joints, and pre-finished metal-clad column covers. These metallic surfaces create less light reflection than glazed surfaces. Therefore, the Previously Proposed Project would result in a *less-than-significant* impact related to light and glare.

VQ-5: Cumulative Visual Impacts. The Previously Proposed Project, and other projects in the area, could be visible from scenic viewpoints. However, because of the flat topography, distance, intervening vegetation and development, and the relatively low-scale characteristics of the area, it is unlikely that the Previously Proposed Project and other projects could be viewed in the same context. In addition, the

other nearby projects are speculative, and their height, bulk, and lighting characteristics are currently unknown. As such, cumulative visual quality impacts, including new sources of shadows, are considered *less than significant*.

Impacts of Revised Project

Impacts Not to Be Evaluated

VQ-2: Damage to Scenic Resources within a State Scenic Highway. As with the Previously Proposed Project, no portion of the Project Site can be seen from I-280. Therefore, the Revised Project would result in *no impact* related to scenic resources within a state scenic highway.

Impacts to Be Evaluated

As with the Previously Proposed Project, photomontages of three different locations have been prepared by the Project Sponsor's architect, Gensler, for the Revised Project (as shown in Figures 13 through 15). These visual simulations show how the proposed buildings would appear from surrounding locations. However, proposed landscaping is not shown in the visual simulations, which represent a conservative scenario of potential conditions, because landscaping would block some views of the proposed buildings. At maturity, the vegetation at the Project Site should mask a substantial portion of the buildings and make them visually subordinate to and harmonious with their surroundings. The photomontages are used to provide a reasonable representation of the general massing, scale, and height of the buildings upon completion. The photomontages for the Previously Proposed Project, as discussed above, are also included for comparison with the Revised Project.

VQ-1: Alteration of Scenic Vistas. Similar to the Previously Proposed Project, the Revised Project would increase massing and bulk considerably compared with existing conditions. As shown in Figure 13, foreground views from Coyote Point Recreation Area are considered scenic vistas and would remain the same with implementation of either the Previously Proposed Project or the Revised Project. However, background views of the Santa Cruz Mountains would be altered because of the proposed development in the middleground. As with the Previously Proposed Project, under the Revised Project, Buildings 1, 2, and 3 would partially obscure existing views of the Santa Cruz Mountains as seen from Coyote Point. However, existing development west of the Project Site is of similar size and scale and already partially obstructs portions of the Santa Cruz Mountains. As such, although height and massing would increase, the development would represent a minor part of the overall view available from this location. Furthermore, this increased development at the Project Site under the Revised Project would be similar in size and scale to that of the Previously Proposed Project. Therefore, the Revised Project, as with the Previously Proposed Project, would have a *less-than-significant* impact on scenic vistas. The Revised Project would not result in any impacts beyond those identified in the certified Environmental Impact Report (EIR).

VQ-3: Degradation of Existing Visual Character or Quality. Similar to the Previously Proposed Project, the Revised Project would replace a vacant lot and its cracked paved surfaces, dirt mounds, and ruderal weeds and shrubs with new buildings, enhanced landscaping, and bicycle/pedestrian amenities. As with the Previously Proposed Project, the Revised Project would develop buildings with heights of 32 to 144 feet, which would substantially increase building mass and alter the visual character of the Anza Point subarea. However, this change would result in a more cohesive visual pattern, which is encouraged by the City through policies and design guidelines contained in the Bayfront Specific Plan. To reduce impacts on views of the Project Site, the Project Sponsor would be required to install







Sources: Atkins, 2011 and Genlser, 2016.









Sources: Atkins, 2011 and Genlser, 2016.



landscaping that would block some of the views of the proposed buildings. Native plant species would be planted at the Project Site in areas where the amount of surface asphalt has been reduced. Consistent with the Bayfront Specific Plan design guidelines for the Anza Point subarea, landscaping would protect and enhance view corridors and be used as a visual buffer to shield adjacent views.

As a part of the development entitlement process, the proposed landscape plan will be reviewed by the Planning Commission for consistency with the requirements of the Bayfront Specific Plan design guidelines. The Planning Commission will also review the Project for consistency with the exterior building design guidelines in the Bayfront Specific Plan for the Anza Point subarea. Consistent with the Anza Point design guidelines, exterior building materials and finishes should convey a sense of integrity, permanence, and durability. In addition, the buildings should visually connect to the Bay Trail and have a visual pattern.

The Revised Project office buildings would employ high-efficiency floor-to-ceiling glass units, coupled with vertical exterior fins. The pattern for the vertical fins would reinforce the buildings' massing and setbacks, with a denser pattern at the lower floors and a less dense pattern at the upper floors. The fins would stop 8 feet above the ground so that interior amenities and lobbies would be accessible. The Revised Project would use natural materials, such as stone and wood; create transparent ground-floor façades; and orient the buildings toward the pedestrian promenade. These exterior finishes would most likely allow the buildings to integrate with the existing background by using colors that would match the surroundings, subject to review and approval by the City. Exterior building treatments will ultimately be reviewed and approved by the Planning Commission prior to construction.

Figure 14 depicts the view of the Project Site as seen from northbound US 101. As shown, there are unobstructed views of the Project Site from the Peninsula Avenue/US 101 onramp. San Bruno Mountain is also visible in the background, beyond the site. As depicted in Figure 14, the office buildings, amenities center, and parking structure proposed under the Revised Project would be taller than the existing development at the Project Site. Similar to the Previously Proposed Project, the office buildings, amenities center, and parking structure proposed under the Revised Project would be visible to varying degrees from the Peninsula Avenue/US 101 onramp. However, the proposed landscaping (not shown in the visual simulations), which would be visible along the eastern perimeter, would soften the Revised Project's appearance and reduce its visual contrast with the surrounding landscape. Figure 15 depicts the Project Site as viewed by motorists on southbound US 101. Existing views of the Project Site from this location are highly channelized. Background views of the East Bay Hills are visible only on clear days from this location. As shown in Figure 15, the Revised Project would add substantial height, mass, and bulk to the view from this location and become the dominant visual feature. In addition, the proposed parking structure could visually contrast with the proposed office buildings. However, as stated above, views of the Project Site from both northbound and southbound US 101 would be brief.

Development of the office buildings, amenities center, and parking structure proposed under the Revised Project or the addition of new landscaping would not be considered a substantial degradation of the existing visual character or quality of the Project Site or its surroundings. The Revised Project would comply with the City's design review process and landscaping standards, ensuring that future development would be visually compatible with the character of the surrounding area. Therefore, the Revised Project would have a *less-than-significant* impact related to overall degradation of existing visual character and quality and may be considered an improvement compared with existing conditions. The Revised Project would not result in any impacts beyond those identified in the EIR.

VQ-4: New Sources of Light and Glare. The Revised Project would include the same number of buildings as the Previously Proposed Project, at approximately the same height. As with the Previously Proposed Project, the Revised Project would add exterior lighting to an area where there is currently no lighting. Lighting would be designed to meet the requirements of Municipal Code Section 18.16.030 to prevent light spillage offsite. In addition, lighting standards under the Revised Project would comply with Leadership in Energy and Environmental Design (LEED) and California Green (CALGreen) performance standards to minimize light spillage from the buildings and site. The standard set by LEED reflects the intent of the minimum lighting standard for the Revised Project. The design would also comply with CALGreen light pollution reduction standards.

Similar to the Previously Proposed Project, the Revised Project could also have glare impacts. Highly reflective surfaces at the Project Site could have impacts along US 101. However, the proposed building glass would have a low-emissivity coating with a low solar heat gain coefficient. The exterior reflectivity of the glass would range from 20 to 30 percent (not to exceed 30 percent). All exterior paint colors would be standard metal paint finishes. Native plant species would be planted at the Project Site to screen some of the light and glare from buildings, as seen from adjacent area. As such, the light and glare impacts of the Revised Project would be similar to those of the Previously Proposed Project. Therefore, similar to the Previously Proposed Project, the Revised Project would result in *less-than-significant* light and glare impacts. The Revised Project would not result in any impacts beyond those identified in the EIR.

VQ-5: Cumulative Visual Impacts. The Revised Project would result in massing and bulk that would be similar to that of the Previously Proposed Project. As such, the Revised Project's contribution to cumulative impacts would be similar. The buildings on the Project Site, as well as development from other projects in the area, could be visible from scenic vantage points or to sensitive receptors in the area. However, because of the vantage points, distance, and intervening vegetation and development, it is unlikely that the Revised Project and other projects would be viewed in the same context especially considering the nearest anticipated cumulative project is at 1300 Bayshore Highway, approximately 1.4 miles to the northwest of the Project Site. As such, cumulative visual quality impacts are considered *less than significant*, similar to the Previously Proposed Project.

Transportation

Summary of Previously Proposed Project

TR-1: Intersection Operations. The traffic impact analysis (TIA) for the Previously Proposed Project included a project-level analysis of the proposed development, including office space or life science uses and amenities space. For the purposes of the TIA, it was assumed that the Previously Proposed Project would include office uses to determine the amount of traffic that would be generated. Based on the Institute of Transportation Engineers (ITE) trip generation rates for each proposed land use, the Previously Proposed Project (without a Transportation Demand Management [TDM] program) would generate 1,102 trips during the AM Peak Hour and 1,124 trips during the PM Peak Hour.

The proposed TDM program, included as part of the Previously Proposed Project, expected to reduce peak-hour trip generation by 13 percent. As shown in Table 3-2, implementation of the TDM program would result in 114 fewer AM Peak-Hour trips and 111 fewer PM Peak-Hour trips. The trip generation resulting from the childcare, health club, retail, and restaurant uses assumed a 50 percent reduction in associated trips. With this adjustment, the Previously Proposed Project would generate approximately 8,215 daily trips, 988 AM Peak-Hour trips, and 1,013 PM Peak-Hour trips, as shown in Table 3-2. The TIA concluded that all but one of the study intersections under the Previously Proposed Project would continue to operate at level of service (LOS) D or better during both peak hours under both conditions. The unsignalized intersection at Amphlett Boulevard and Poplar Avenue would continue to operate at LOS F during both AM and PM peak hours. The Previously Proposed Project would add traffic to the intersection, which would be a *significant* impact.

Table 3-2. Previously Proposed Project Trip Estimates

			AM	Peak I	Hour	PM	Peak I	Hour
Land Use	Size	Daily Trips	In	Out	Total	In	Out	Total
Office	690 ksf	5,902	774	106	879	145	707	851
Childcare	8 ksf	634	52	46	98	47	53	100
Internal Reduction		-317	-26	-23	-49	-24	-27	-50
Health Club	25 ksf	836	16	19	35	51	38	89
Internal Reduction		-418	-8	-10	-18	-25	-19	-45
Retail	20 ksf	877	12	8	20	37	39	76
Internal Reduction		-439	-6	-4	-10	-19	-19	-38
Restaurant	25 ksf	3,179	152	140	292	165	115	279
Internal Reduction		-1,589	-76	-70	-146	-82	-57	-140
TDM Reduction		-450	-101	-14	-114	-19	-92	-111
Total		8,215	789	199	988	276	737	1,013

ksf = thousand square feet

Source: Hexagon Transportation Consultants, 2011.

MITIGATION MEASURE. The City of San Mateo is considering a range of potential improvements at the Amphlett Boulevard/Poplar Avenue intersection to provide sufficient capacity for existing and future traffic volumes. However, a specific improvement project has not been identified at this time. The Project Sponsor shall make a fair-share contribution toward the cost of improvements at this intersection for the project's impacts. However, because no specific improvement project has been identified and because this intersection is under the control of an agency other than the City of Burlingame (California Department of Transportation [Caltrans] and the City of San Mateo), the impact is considered *significant and unavoidable*.

TR-2: Freeway Ramp Operations. An analysis of the freeway ramps that provide access to the Project Site was included in the TIA. The interchanges of US 101/Broadway, US 101/Anza Boulevard, US 101/Airport Boulevard, and US 101/Poplar Avenue were analyzed, based on the ramps' volume-to-capacity (V/C) ratios, to determine their respective operating levels of service under the Previously Proposed Project. With the addition of project-generated traffic, the freeway ramps would continue to operate at acceptable levels of service. Therefore, the Previously Proposed Project would result in *less-than-significant* impacts on freeway ramp operations.

TR-3: Freeway Segment Operations. Using the City/County Association of Governments of San Mateo County (C/CAG) travel forecast model, the impact on freeway segments was deemed significant if project-generated traffic amounted to more than 1 percent of capacity on freeway segments with substandard levels of service. Based on this standard, the Previously Proposed Project would have a *significant* impact on the following six freeway segments during at least one peak hour:

- US 101, southbound between Millbrae Avenue and Broadway both AM and PM peak hours
- US 101, northbound, between Peninsula Avenue and State Route (SR) 92 both AM and PM peak hours
- US 101, northbound, between SR 92 and Whipple Avenue PM Peak Hour only
- US 101, northbound between Whipple Avenue and the Santa Clara county line PM Peak Hour only
- US 101, southbound between Whipple Avenue and the Santa Clara county line both AM and PM peak hours
- SR 92, eastbound between Interstate 280 and US 101 both AM and PM peak hours

MITIGATION MEASURE. Mitigation of significant Previously Proposed Project impacts on freeway segments would require freeway widening to construct additional through lanes, thereby increasing freeway capacity. However, it is not feasible for an individual development project to bear responsibility for implementing such extensive transportation system improvements because of acquisition constraints and right-of-way costs. In addition, no comprehensive project that would add through lanes has been developed by Caltrans or C/CAG for individual projects to contribute to, and no other mechanism exists for making a fair-share contribution. Therefore, the significant impacts on the freeway segments identified above would be *significant and unavoidable*.

TR-4: Air Traffic Patterns. The Project Site is approximately 2 miles southeast of San Francisco International Airport (SFO). The aeronautical study conducted by the Federal Aviation Administration found that the proposed buildings and parking structure under the Previously Proposed Project would not exceed obstruction standards and would not be a hazard to air navigation. In addition, C/CAG Airport Land Use Committee (ALUC) staff members determined that the Previously Proposed Project would not require formal review/action by the C/CAG ALUC or C/CAG Board of Directors because the changes to the plan do not change the land use designation, and the heights proposed fall within the allowable heights contained in the San Mateo County Comprehensive Airport Land Use Plan (ALUP). As such, the Previously Proposed Project would be in compliance with the ALUP, resulting in **no impact**.

TR-5: Transit Service, Pedestrian Facilities, and Bicycle Facilities. Transit service in the vicinity of the Project Site is provided by Caltrain, SamTrans, and Bay Area Rapid Transit (BART) (with shuttle service to the Millbrae BART station). The TDM program included as part of the Previously Proposed Project would reduce the number of employee trips by 7 percent because of the proposed shuttle service. Given the nearby transit service and the Previously Proposed Project–sponsored employee shuttle, the existing and planned transit facilities would be adequate for the estimated project transit demand, and the impacts associated with the addition of the Previously Proposed Project transit demand would be less than significant.

Pedestrian traffic would be generated primarily by employees of the Previously Proposed Project while walking to and from campus buildings, transit stops, and nearby businesses as well as visitors to the adjacent San Francisco Bay Trail (Bay Trail). The current sidewalk and Bay Trail network in the vicinity of the Project Site is incomplete, forcing pedestrians to cross streets with no crosswalks. The Previously

Proposed Project includes a continuous sidewalk network along both sides of the proposed Airport Boulevard realignment. The Previously Proposed Project would also include a new signalized intersection along Airport Boulevard that would provide protected pedestrian crosswalks. The proposed increased pedestrian connectivity along Airport Boulevard would be a beneficial impact of the Previously Proposed Project.

Bicycle routes are available on Airport Boulevard adjacent to the Project Site as well as on Broadway and Bayshore Highway to the north. Under the site plan for the Previously Proposed Project, the Bay Trail and the Spur Trail system along Sanchez Channel would be the primary means of bicycle access to the Project Site. Development of the Project Site would include a clearly marked 14-foot-wide inside shared lane for on-street bicycle travel along the realigned Airport Boulevard. The bicycle demand created by the Previously Proposed Project could be accommodated by the existing and planned bicycle facilities in the area. Bicycle demand associated with the Previously Proposed Project would have a less-than-significant impact on existing and planned bicycle facilities. Therefore, the Previously Proposed Project would have a beneficial or *less-than-significant* impact on transit service, pedestrian facilities, and bicycle facilities in the project area.

TR-6: Site Access, Circulation, and Parking. The Previously Proposed Project would realign Airport Boulevard to pass through the middle of the Project Site, between the proposed buildings. Access to the parking areas is proposed through two signalized intersections at previously entitled locations. Access to all surface parking, above-grade parking, below-grade parking, and loading dock areas would be provided through these signalized intersections to keep traffic out of the pedestrian promenade. The Previously Proposed Project would install pedestrian treatments at the middle intersection, including special pavers and a raised speed table. In addition, each underground parking garage would have two entrance/exit points, as would the aboveground parking structure. The Previously Proposed Project would include 2,318 parking spaces, which would be adequate to serve the proposed uses. The Previously Proposed Project would have a **less-than-significant** impact on site access, circulation, and parking.

TR-7: Cumulative Intersection Operations. Cumulative without- and with-Project peak-hour traffic volumes were estimated using the C/CAG traffic model for 2035. The model takes into account pending developments in the vicinity of the Project Site as well as forecasts of jobs, housing, and population for the city, the county, and the region, as developed by the Association of Bay Area Governments (ABAG). The results show that most of the study intersections would continue to operate at LOS D or better during both peak hours under cumulative conditions. The unsignalized intersection of Amphlett Boulevard and Poplar Avenue would continue to operate at LOS F during both AM and PM peak hours under cumulative conditions. The Previously Proposed Project would add traffic to the intersection, which would be a **significant** impact.

MITIGATION MEASURE. The City of San Mateo is considering a range of potential improvements at the Amphlett Boulevard/Poplar Avenue intersection to provide sufficient capacity for existing and future traffic volumes. However, a specific improvement project has not been identified at this time. The Project Sponsor shall make a fair-share contribution toward the cost of improvements at this intersection. However, because no specific improvement project has been identified and because this intersection is under the control of an agency other than the City of Burlingame (Caltrans and San Mateo), the impact is *significant and unavoidable*.

TR-8: Cumulative Freeway Ramp Operations. The interchanges of US 101/Broadway, US 101/Anza Boulevard, US 101/Airport Boulevard, and US 101/Poplar Avenue were analyzed, based on the ramps' V/C ratios, to determine operating levels of service under cumulative conditions. With the addition of

project-generated traffic, the freeway ramps would continue to operate at acceptable levels of service under cumulative conditions. As such, the Previously Proposed Project's cumulative impact would be *less than significant*.

TR-9: Cumulative Freeway Segment Operations. The impact on freeway segments was deemed significant if project-generated traffic amounted to more than 1 percent of capacity on freeway segments with substandard levels of service. Based on this standard, under conditions with traffic from Project Site only, the Project would have a *significant* impact on the following 10 freeway segments during at least one peak hour:

- US 101, northbound between Millbrae Avenue and I-380 AM and PM peak hours
- US 101, southbound between I-380 and Millbrae Avenue AM Peak Hour
- US 101, southbound between Millbrae Avenue and Broadway AM and PM peak hours
- US 101, northbound, between SR 92 and Peninsula Avenue AM and PM peak hours
- US 101, southbound between Peninsula Avenue and SR 92 AM Peak Hour
- US 101, northbound between SR 92 and Whipple Avenue PM Peak Hour
- US 101, northbound between the Santa Clara county line and Whipple Avenue PM Peak Hour
- US 101, southbound between Whipple Avenue and the Santa Clara county line AM and PM peak hours
- SR 92, westbound, between US 101 and I-280 AM Peak Hour
- SR 92, eastbound between I-280 and US 101 AM and PM peak hours

MITIGATION MEASURE. Mitigation of significant Previously Proposed Project impacts on freeway segments would require roadway widening to construct additional through lanes, thereby increasing freeway capacity. It is not feasible for an individual development project to bear responsibility for implementing such extensive transportation system improvements because of acquisition constraints and right-of-way costs. Furthermore, no comprehensive project to add through lanes has been developed by Caltrans or C/CAG for individual projects to contribute to. Therefore, the significant cumulative impacts on the freeway segments identified above must be considered *significant and unavoidable*.

Impacts of Revised Project

Impacts Not to Be Evaluated

TR-4: Air Traffic Patterns. The office building massing under the Revised Project would retain the same building height as that of the Previously Proposed Project. Similar to the Previously Proposed Project, the Revised Project would not require formal review/action by the C/CAG ALUC or C/CAG Board of Directors because the changes to the plan would not change the land use designation, and the heights proposed fall within the allowable heights contained in the San Mateo County Comprehensive ALUP. As such, the Revised Project would be in compliance with the ALUP, resulting in **no impact**. Impacts related to air traffic patterns under the Revised Project would be the same as those of the Previously Proposed Project.

Impacts to Be Evaluated

TR-1: Intersection Operations. A traffic analysis was prepared for the Revised Project.¹³ It concluded that, despite changes in the square footage for office uses and amenities, the Revised Project would be consistent with the trip generation estimates and the traffic impact findings of the 2011 TIA and certified Final EIR. Similar to the Previously Proposed Project, the proposed TDM program presented in the Revised Project is expected to reduce peak-hour trip generation by 13 percent and daily trip ratios by 8 percent. As shown in Table 3-3, with this adjustment, the Revised Project would generate approximately 8,087 daily trips, 1,033 AM Peak-Hour trips, and 995 PM Peak-Hour trips. Compared with the Previously Proposed Project, the Revised Project would result in a slight decrease in the number of daily trips (128 trips) and PM Peak-Hour trips (18 trips) but a slight increase in AM Peak-Hour trips (45 trips). Not all trips generated by the project would travel in the same direction while going to and from the Project Site. Thus, not all 45 additional trips in the AM Peak Hour would travel through the same intersections or make the same turning movements. Because of this, no single intersection would experience 45 additional AM Peak-Hour trips. Even the study intersections closest to the Project Site would most likely experience only half that number of trips. The addition of approximately 20 to 25 trips at an intersection would not cause a significant impact, based on the City of Burlingame's definition of significant impacts at intersections. ¹⁴ Therefore, the Revised Project would not result in a significant impact on any additional intersections. Although the total number of daily trips would decrease slightly under the Revised Project, the unsignalized intersection at Amphlett Boulevard and Poplar Avenue might continue to operate at unacceptable levels of service during both the AM and PM peak hours. Similar to the Previously Proposed Project, the Revised Project would add traffic to the intersection, which would be a *significant* impact.

MITIGATION MEASURE. The City of San Mateo is considering a range of potential improvements at the Amphlett Boulevard/Poplar Avenue intersection to provide sufficient capacity for existing and future traffic volumes. However, a specific improvement project has not been identified at this time. The Project Sponsor shall make a fair-share contribution toward the cost of improvements at this intersection. However, because no specific improvement project has been identified and because this intersection is under the control of an agency other than the City of Burlingame (Caltrans and San Mateo), the impact would be *significant and unavoidable*. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

¹³ Hexagon Transportation Consultants, Inc. 2016. *Traffic Analysis and Site Plan Review of the CEQA Addendum for the 300 Airport Boulevard Project in Burlingame, California.* June 13, 2016. Included as Appendix A of this document.

¹⁴ The City of Burlingame does not have Council-adopted definitions for significant traffic impacts. However, the standards used for this analysis have been used in other traffic studies and EIRs within the city. Therefore, as with the Previously Proposed Project, the Revised Project would have a significant adverse impact on traffic conditions at a signalized intersection in Burlingame if, for any peak hour, (1) LOS at the intersection degrades from an acceptable LOS of D or better under existing conditions to an unacceptable LOS of E or F under existing plus-project conditions or (2) LOS at the intersection is an unacceptable LOS of E or F under existing conditions and the addition of project trips causes average delay at the intersection to increase by 5 or more seconds.

Table 3-3. Revised Project Trip Estimates

		Daily	AM	Peak H	lour	PM	Peak I	Hour
Land Use	Size	Trips	In	Out	Total	In	Out	Total
Office ^a	711.9 ksf	5,835	802	110	920	149	727	876
Childcare ^b	5.25 ksf	389	34	30	64	30	34	65
Internal Reduction		-194	-17	-15	<i>-32</i>	-15	-17	-32
Health Club ^c	7.4 ksf	244	5	5	10	15	11	26
Internal Reduction		-122	-3	-3	-5	-7	-6	-13
Retail ^d	6.6 ksf	283	4	2	6	12	13	25
Internal Reduction		-142	-2	-1	-3	-6	-6	-12
Restaurant ^e	35.6 ksf	4,522	211	173	384	210	140	350
Internal Reduction		-2,261	-106	-87	-192	-105	-70	-175
TDM Reduction		-467	-105	-14	-120	-19	-94	-114
Total		8,087	832	<i>201</i>	1,033	263	732	995

Source: Hexagon Transportation Consultants, 2016.

TR-2: Freeway Ramp Operations. The interchanges of US 101/Broadway, US 101/Anza Boulevard, US 101/Airport Boulevard, and US 101/Poplar Avenue would continue to operate at acceptable levels of service with implementation of the Revised Project. The Revised Project would generate fewer daily trips than the Previously Proposed Project. As such, there would be no new or more significant impact under the Revised Project. This impact would be *less than significant*.

TR-3: Freeway Segment Operations. Although the Revised Project would generate slightly fewer daily vehicle trips than the Previously Proposed Project, the Revised Project would still result in a *significant* impact on the six freeway segments, as listed above.

MITIGATION MEASURE. Mitigation of significant Revised Project impacts on freeway segments would require freeway widening to construct additional through lanes, thereby increasing freeway capacity. However, it is not feasible for an individual development project to bear responsibility for implementing such extensive transportation system improvements because of acquisition constraints and right-of-way costs. In addition, no comprehensive project to add through lanes has been developed by Caltrans or C/CAG for individual projects to contribute to, and no other mechanism exists for making a fair-share contribution. Therefore, the significant impacts on the freeway segments as a result of the Revised Project would be *significant and unavoidable*. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

^{a.} Institute of Transportation Engineers. 2012. *Trip Generation*. Ninth Edition. General Office Building (710). Fitted curve equation used. Proposed conference center (8,538 gsf) and the two elevators that would serve the entire project (200 gsf) are included in the office square footage.

b. Institute of Transportation Engineers. 2012. Trip Generation. Ninth Edition. Day Care Center (565).

c. Institute of Transportation Engineers. 2012. *Trip Generation*. Ninth Edition. Health/Fitness Club (492).

d. Institute of Transportation Engineers. 2012. Trip Generation. Ninth Edition. Shopping Center (820).

^{e.} Institute of Transportation Engineers. 2012. *Trip Generation.* Ninth Edition. High-Turnover (Sit-Down) Restaurant (932).

TR-5: Transit Service, Pedestrian Facilities, and Bicycle Facilities. The transit demand generated by the Revised Project would be similar to that of the Previously Proposed Project. Given the nearby Caltrain station, BART station, SamTrans bus routes, and the Previously Proposed Project–sponsored employee shuttle, the existing and planned transit facilities would be adequate for the estimated Revised Project transit demand, and the impacts associated with the addition of the Revised Project transit demand would be less than significant.

The pedestrian traffic generated by the Revised Project would be similar to that of the Previously Proposed Project. Pedestrian circulation improvements under the Revised Project would include new sidewalks on both sides of Airport Boulevard, crosswalks on Airport Boulevard, and an east-west pedestrian promenade that would bisect the Project Site. Walkways would serve the bicycle commuter facilities and connect to Bay Trail segments. The pedestrian promenade would be publicly accessible and would provide a path of entry to the office buildings. The landscaping and pedestrian promenade between the buildings would be designed for the pedestrian experience rather than vehicles. Thus, pedestrian circulation under the Revised Project would be improved compared with the Previously Proposed Project. The number of bicycle trips generated by the Revised Project would be similar to that of the Previously Proposed Project. Thus, similar to the Previously Proposed Project, the bicycle demand created by the Revised Project could be accommodated by the existing and planned bicycle facilities in the area.

As with the Previously Proposed Project, the Revised Project would have a beneficial or *less-than-significant* impact on transit service, pedestrian facilities, and bicycle facilities in the project area. The Revised Project would not result in a new or more significant impact compared with the Previously Proposed Project. The Revised Project would not result in any impacts beyond those identified in the certified Final EIR.

TR-6: Site Access, Circulation, and Parking. Similar to the Previously Proposed Project, the Revised Project would realign Airport Boulevard to pass through the middle of the Project Site, with proposed buildings on either side of the realigned Airport Boulevard. Access to the parking areas is proposed through two signalized intersections at previously entitled locations. Access to all surface parking, above-grade parking, below-grade parking, and loading dock areas would be provided through these signalized intersections to keep traffic out of the pedestrian promenade. In addition, each underground parking garage would have two entrance/exit points, as would the aboveground parking structure. Similar to the Previously Proposed Project, the Revised Project would include 2,318 parking spaces. The changes to the site plan under the Revised Project would not result in hazards regarding site access and circulation. Overall, the Revised Project would have a **less-than-significant** impact on site access, circulation, and parking.

TR-7: Cumulative Intersection Operations. As with the Previously Proposed Project, most of the study intersections would continue to operate at acceptable levels during both peak hours under cumulative conditions. However, the unsignalized intersection of Amphlett Boulevard and Poplar Avenue could continue to operate at unacceptable levels during both the AM and PM peak hours under cumulative conditions. The Revised Project's contribution to this cumulative impact would be the same as under the Previously Proposed Project. Because the Revised Project would add traffic to this intersection, this is considered a **significant** impact.

¹⁵ Hexagon Transportation Consultants, Inc. 2016. *Traffic Analysis and Site Plan Review of the CEQA Addendum for the 300 Airport Boulevard Project in Burlingame, California.* June 13, 2016. Included as Appendix A of this document.

MITIGATION MEASURE. The City of San Mateo is considering a range of potential improvements at the Amphlett Boulevard/Poplar Avenue intersection to provide sufficient capacity for existing and future traffic volume. However, a specific improvement project has not been identified at this time. The Project Sponsor shall make a fair-share contribution toward the cost of improvements at this intersection. However, because no specific improvement project has been identified and because this intersection is under the control of an agency other than the City of Burlingame (Caltrans and San Mateo), the impact must be considered *significant and unavoidable*. In addition, the Revised Project would generate fewer daily trips than the Previously Proposed Project. As such, there would be no new or more significant cumulative impact related to intersection operations.

TR-8: Cumulative Freeway Ramp Operations. The interchanges of US 101/Broadway, US 101/Anza Boulevard, US 101/Airport Boulevard, and US 101/Poplar Avenue were analyzed, based on the ramps' V/C ratios, to determine operating levels of service under cumulative conditions. With the addition of project-generated traffic, the freeway ramps would continue to operate at acceptable levels of service under cumulative conditions. As such, the Revised Project's cumulative impact would be *less than significant*. However, the Revised Project would generate fewer daily trips than the Previously Proposed Project. Thus, since the Revised Project's contribution to this cumulative impact would decrease slightly, there would be no new or more significant cumulative impact related to freeway ramp operations.

TR-9: Cumulative Freeway Segment Operations. Although assumptions for cumulative development may have changed since the analysis in the EIR was conducted, the Revised Project's contribution to cumulative freeway segment operations remains consistent with the Previously Proposed Project. The impact on freeway segments was deemed significant if project-generated traffic amounted to more than 1 percent of capacity on freeway segments with substandard levels of service. Based on this standard, under conditions with traffic from the Project Site, the Revised Project would have a *significant* impact on the 10 freeway segments during at least one peak hour, as listed above for the Previously Proposed Project.

MITIGATION MEASURE. Mitigation of significant project impacts on freeway segments would require roadway widening to construct additional through lanes, thereby increasing freeway capacity. It is not feasible for an individual development project to bear responsibility for implementing such extensive transportation system improvements because of acquisition constraints and right-of-way costs. Furthermore, no comprehensive project to add through lanes has been developed by Caltrans or C/CAG for individual projects to contribute to. Therefore, the significant cumulative impacts on the freeway segments identified above must be considered *significant and unavoidable*. However, the Revised Project would generate fewer daily trips than the Previously Proposed Project. As such, there would be no new or more significant cumulative impact related to freeway segment operations.

Air Quality

Summary of Previously Proposed Project

AQ-1: Consistency with Applicable Air Quality Plans. The most current air quality plan for the region is the Bay Area Air Quality Management District's (BAAQMD's) recently adopted 2010 Clean Air Plan (CAP). For consistency with the 2010 CAP, a project must demonstrate that the population or vehicle-miles-traveled (VMT) assumptions contained in the CAP would not be exceeded and that the project would implement Transportation Control Measures (TCMs), as applicable. Development of the

Previously Proposed Project under the worst-case employment scenario could increase the number of residents in the county by approximately 0.10 percent. Development of the Previously Proposed Project would also result in 8,215 net new vehicle trips per day, ¹⁶ corresponding to a regional increase in VMT totaling 64,629 miles per day. The addition of Previously Proposed Project VMT to the 2035 forecast would increase VMT by 0.33 percent.

The Previously Proposed Project would include a Transportation Demand Management (TDM) program to reduce the volume of vehicular traffic generated at the site. The transportation improvements associated with the TDM program are supportive of the TCMs that were identified in the 2005 Ozone Strategy as critical to attaining the California Clean Air Act ozone standard. However, because the Previously Proposed Project would increase the VMT figure assumed under the CAP, it would not conform to regional air quality plans and would have a significant impact on the implementation of state and federal air quality plans. Given the extensive TDM measures already included in the Previously Proposed Project, there are no additional feasible mitigation measures that would further reduce impacts resulting from the increased VMT associated with the Previously Proposed Project. Therefore, because the increase in VMT cannot be further mitigated, impacts would be *significant and unavoidable*.

AQ-2: Violation of Particulate Matter Ambient Air Quality Standards. Construction activities associated with the Previously Proposed Project would require the use of heavy trucks, excavating and grading equipment, concrete mixers, and other mobile and stationary construction equipment. Fugitive dust emissions during construction would be caused by material handling and traffic on unpaved or unimproved surfaces. Heavy construction activity on dry soil that would become exposed during construction could cause dust emissions (usually monitored as particulate matter 10 microns in diameter or less [PM10]), which could be annoying and/or unhealthy for persons near the construction area.

BAAQMD considers construction-related fugitive dust emissions to be less than significant with implementation of BAAQMD-identified defined best management practices (BMPs) related to dust control. However, without implementation of mitigation measures, the impact would be *potentially significant*.

MITIGATION MEASURE. Mitigation Measure AQ-2.1 would require implementation of all appropriate dust control measures recommended by BAAQMD. Inclusion of these measures in the construction contracts for future development at the Project Site would reduce construction-related air quality impacts to a *less-than-significant* level.

AQ-3: Compliance with BAAQMD California Environmental Quality Act (CEQA) Significance Criteria Regarding Construction-related Criteria Air Pollutants and Ozone Precursor Emissions. Emissions of criteria air pollutants and ozone precursors were modeled using URBEMIS program defaults and BAAQMD-recommended settings and parameters, which are tied to the activity period and site location. The model factored in the land use type and the size of each component of the Previously Proposed Project as well as the expected duration of construction activity. The model also estimated daily construction emissions under each construction scenario and phase of construction. Two different construction scenarios were analyzed. One scenario separated construction of the Project Site into two phases, and the other scenario combined construction of both campuses into a single phase. Construction-related emissions of reactive organic gas (ROG) and oxides of nitrogen (NO $_X$) under each scenario would have the potential to exceed the 2011 BAAQMD thresholds of significance, as shown in Table 3-4, and would result in *significant* impacts on air quality.

¹⁶ Hexagon Transportation Consultants. 2011. Burlingame Point Traffic Impact Analysis.

Table 3-4. Previously Proposed Project Construction-Period Criteria Pollutant Emissions

	ROG (lbs/day)	NO _x (lbs/day)	Exhaust PM10 (lbs/day)	Exhaust PM2.5e (lbs/day)
Maximum Unmitigated Daily Emissions				
Phase I Only (East Campus) ^a	64.13	79.75	4.49	4.13
Phase II Only (West Campus) ^b	80.04	66.79	3.18	2.93
One Phase Only (East and West Campus) ^c	108.43	84.13	4.74	4.36
Maximum Mitigated Emissions				
Phase I Only (East Campus)	58.71	64.51	2.53	2.32
Phase II Only (West Campus)	72.82	55.24	2.03	1.84
One Phase Only (East and West Campus)	83.5	74.14	3.05	2.77
BAAQMD Threshold ^d	54	54	82	54
Combined Components Exceeds Threshold?	Yes	Yes	No	No

Source: Atkins, 2011. Based on URBEMIS 2007, version 9.2.4, and compliance with BAAQMD Regulation 8, Rule 3. URBEMIS models are provided in Appendix D of the Draft Environmental Impact Report. *Notes:*

- a. Phase I Only (East Campus) consists of the realignment of Airport Boulevard, civil grading, utilities installation, construction of the underground parking structure at Buildings B1 and B2, construction of Buildings B1 and B2, construction of the amenities building, and landscaping improvements.
- b. Phase II Only (West Campus) consists of remaining civil and grading activities, construction of Buildings B3 and B4, construction of the parking structure, and additional landscaping and public access improvements.
- c. Phase I Only (East and West Campus) consists of the realignment of Airport Boulevard; civil grading; utilities installation; construction of the underground parking structure at Buildings B1 and B2; construction of Buildings B1, B2, B3, and B4; construction of the amenities building; and landscaping and public access improvements in a single phase.
- d. BAAQMD California Environmental Quality Act Guidelines, May 2011.
- e. Particulate matter 2.5 microns in diameter or less.

MITIGATION MEASURES. Even with implementation of Mitigation Measures AQ-3.1 (construction equipment emissions minimization) and AQ-3.2 (application of low-VOC coatings), construction-related emissions would still have the potential to exceed the 2011 BAAQMD significance thresholds for ROG and NO_X . Therefore, construction emissions from Previously Proposed Project development are considered *significant and unavoidable*.

AQ-4: Compliance with BAAQMD CEQA Significance Criteria Regarding Operational Criteria Air Pollutants and Ozone Precursor Emissions. BAAQMD has established thresholds for projects that it reviews for potential air quality impacts. These thresholds are based on the minimum size for a project that BAAQMD considers capable of generating emissions with the potential to exceed the threshold of 54 pounds per day for ROG, NO_X , and PM2.5 and 82 pounds per day for PM10.17 The net increase in emissions under the Previously Proposed Project would be greater than BAAQMD's threshold for PM10, as shown in Table 3-5.

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¹⁷ Bay Area Air Quality Management District. 2011. *California Environmental Quality Act Air Quality Guidelines*. Updated May 2011.

Table 3-5. Previously Proposed Project Daily Operational Air Pollutant Emissions^a

	Project Emissions (Pounds per Day)				
Emissions Source	ROG	NOx	PM10	PM2.5	
Stationary	5.49	5.44	0.04	0.04	
Vehicle	41.17	46.02	111.37	21.17	
Sub-Total	46.66	51.46	111.41	21.21	
BAAQMD Significance Thresholds	54	54	82	54	
Exceeds BAAQMD Thresholds?	No	No	Yes	No	

 $Source: Atkins, 2011. \ Based \ on \ URBEMIS \ 2007, version \ 9.2.4. \ URBEMIS \ models \ are \ provided \ in \ Appendix \ D \ of the \ Draft Environmental Impact Report.$

Note:

The substantial operational emissions generated by the Previously Proposed Project would have a significant impact related to criteria pollutants. Because implementation of the TDM program was part of the Previously Proposed Project, a reduction in the number of trips was reflected in the emissions results. However, even with TDM measures, operational PM10 emissions generated by the Previously Proposed Project would exceed BAAQMD thresholds. Exceedance of BAAQMD significance standards for criteria pollutants would be a *significant* impact.

MITIGATION MEASURES. With the extensive TDM measures already included in the Previously Proposed Project, there are no additional feasible mitigation measures that would further reduce impacts resulting from increased VMT. Because the impact cannot be further mitigated, impacts would be *significant and unavoidable*.

AQ-5: Expose Sensitive Receptors to PM2.5 and Toxic Air Contaminant Concentrations during Operation or Construction. The nearest sensitive receptors are the residences located south and west of US 101, approximately 0.25 mile away. Construction of the Previously Proposed Project would introduce a childcare center and could result in health risks to receptors at the childcare center.

Construction Health Risk Analysis

The childcare center in the proposed amenities building would be constructed during Phase I and operational during construction Phase II, thereby exposing users to construction emissions. The range of unmitigated cancer risk at the modeled locations, representing the location of the amenities center and the outside play area, is from 41.04 in 1 million to 133.02 in 1 million, well above the 10-in-1-million threshold for individual sources and 100-in-1-million threshold for cumulative sources. Risk associated only with the outdoor play yard is anticipated at between 41.04 in 1 million and 51.30 in 1 million, also well above the individual impact threshold.

Non-cancer risk from the construction of Phase II within 200 meters of the operating childcare center is anticipated to range from 0.08 in 1 million to 0.25 in 1 million, well below the regulatory threshold of 1 in 1 million for individual sources and 10 in 1 million for cumulative. Therefore, non-cancer risk would be less than significant with respect to construction activities in the vicinity of the childcare center. PM2.5 exposure from construction of Phase II is estimated to be from 0.38 to 1.23 microgram per cubic meter (μ g/m³), well above the 0.3 μ g/m³ threshold for individual sources and 0.8 μ g/m³ for cumulative sources. The risk for the outdoor play yard is anticipated to be between 0.38 and 0.47 μ g/m³, which also exceeds the individual threshold but not the cumulative threshold.

^{a.} Emissions are based on the maximum development potential for the plan area in 2015, as described in Chapter II, *Project Description*.

Operational Health Risk Analysis

The screening-level analysis of permitted sources and roadways conducted for the Previously Proposed Project demonstrated that the Project Site would not be exposed to individual emissions from offsite stationary sources that would be above the thresholds for cancer risk (10 per million) or non-cancer hazards (1 and 10) or PM2.5 concentrations (0.3 and 0.8 μ g/m³) from either offsite stationary sources or US 101. However, the screening levels anticipated from US 101 would exceed the individual risk thresholds for the childcare center with respect to cancer risk. Therefore, a refined analysis related to proximity to US 101 was conducted.

The cancer risk from locating the childcare center within 1,000 feet of US 101 was determined by the dose multiplied by the cancer potency factor and then converted to risk per million people. Detailed calculation of risk with respect to individual receptor locations on the Project Site is included in the health risk assessment. The maximum potential cancer risk at any modeled onsite location is 3.0 per million, which is below the 10 in 1 million individual-source threshold. The modeled locations, representing the anticipated location of the amenities center and the outside play area, would result in a cancer risk of between 2.7 and a maximum 3.0 per million. Cancer risk determinations are below the respective threshold of 10 per million for individual risk assessment; therefore, the cancer risk for occupants of the childcare center would be less than significant with respect to offsite as well as onsite operational emissions.

If construction of the Previously Proposed Project is phased such that the childcare center is operational while subsequent phases are being constructed, the Previously Proposed Project would result in a cancer risk and PM2.5 exposure that would be above the recommended regulatory thresholds at both the individual and cumulative levels. Therefore, impacts would be *significant*.

MITIGATION MEASURES. With implementation of Mitigation Measure AQ-5.1 (reduce risk of exposure during construction), the risk inside the childcare center would be reduced from between 41.04 in 1 million and 133.02 in 1 million to 8.30 in 1 million adjacent in the portion of the building associated with the location of the childcare center. Therefore, with implementation of Mitigation Measure AQ-5.1, the potential risk during operation of the childcare center would be reduced to *less than significant* for both individual and cumulative risks during construction.

With implementation of Mitigation Measure AQ-5.1, the PM2.5 exposure risk inside the childcare center would be reduced from between 0.38 $\mu g/m^3$ and 1.23 $\mu g/m^3$ to between 0.08 and 0.18 $\mu g/m^3$, well below both the individual and cumulative thresholds. Therefore, with implementation of Mitigation Measure AQ-5.1, potential impacts related to PM2.5 exposure during operation of the childcare center would be reduced to *less than significant* on both an individual and cumulative level during construction. Although the non-cancer risk is below the thresholds without mitigation, implementation of Mitigation Measure AQ-5.1 would further reduce the risk to between 0.02 in 1 million and 0.09 in 1 million.

Implementation of Mitigation Measure AQ-5.1 would also reduce the risk for the outdoor activity center to *a less-than-significant* level with respect to both individual and cumulative risks during construction. If implementation of Mitigation Measure AQ-5.1 is not feasible, the childcare center shall not be allowed to open until all construction activities for Phase II have been completed.

IMPROVEMENT MEASURES. As indicated above, operation of the Previously Proposed Project would not result in significant health risks for sensitive receptors. The Project Sponsor of the Previously Proposed Project has indicated that, as part of the operating conditions for the backup generators,

all testing and maintenance of the generators would be conducted when the childcare center is not in operation. This would eliminate the potential for these onsite sources to represent an increased health risk for students at the childcare center. Improvement measures would further reduce the less-than-significant impact and ensure implementation of the operating conditions.

AQ-6: Carbon Monoxide Compliance with State and Federal Ambient Air Quality Standards. The traffic impact analysis indicates that the intersection with the highest approach volume under any scenario is Bayshore Highway and Broadway, which has a peak-hour intersection approach volume of 5,994 vehicles per hour. Because this volume is substantially less than even the most stringent criterion (24,000 vehicles per hour), impacts related to carbon monoxide concentrations are considered to be *less than significant*.

AQ-7: Objectionable Odors. Construction activities would generate airborne odors that would be associated with the operation of construction vehicles (i.e., diesel exhaust) and the application of architectural coatings. These emissions would most likely occur during daytime hours only and be isolated in the immediate vicinity of the construction site. As explained previously, there are no residential uses adjacent to the Previously Proposed Project, and no residential uses are proposed as a part of the Previously Proposed Project. Therefore, odors from Previously Proposed Project construction would not affect a substantial number of people.

Office uses are not among the land uses that BAAQMD has identified as prime sources of odors (e.g., wastewater treatment plants, sanitary landfills, certain manufacturing plants). The most likely source of airborne odors associated with operation of the office or life science uses would be the refuse storage area(s). These odors would be confined to the immediate vicinity of the storage area(s). Because the refuse receptacles would have lids and be emptied on a regular basis, substantial odors would most likely not have a chance to develop. In addition, residential uses have not been proposed as part of the Previously Proposed Project. Therefore, there would be no adverse odor impacts on onsite or offsite sensitive receptors and **no impacts** from operation of the Previously Proposed Project.

AQ-8: Consistency with Applicable Air Quality Plans. The anticipated growth associated with the Previously Proposed Project would not be consistent with the CAP in that the Previously Proposed Project is increasing VMT compared with base conditions without the Previously Proposed Project. The Previously Proposed Project would implement transportation control and trip reduction measures that would be consistent with BAAQMD's goals for reducing regional air pollutant emissions, as would most likely be the case for all other development projects approved under the City's environmental review process. However, the Previously Proposed Project's contribution to conflicting with or obstructing implementation of the CAP is significant, and the cumulative effects under the Previously Proposed Project would be *significant*.

MITIGATION MEASURE. The increase in VMT cannot be further mitigated for the Previously Proposed Project, resulting in *significant and unavoidable* impacts.

AQ-9: Cumulative Criteria Air Pollutants and Ozone Precursor Emissions – Construction Activities. As discussed above under Impact AQ-3, development of the Previously Proposed Project could exceed the 2011 BAAQMD thresholds of significance for ROG and NO_X during construction. BAAQMD considers projects that would result in a significant criteria air pollutant impact on a project level to be projects that would also result in a cumulatively considerable contribution to regional criteria

air pollutants. ¹⁸ Therefore, construction activities associated with the Previously Proposed Project would contribute to a *significant* cumulative impact related to criteria air pollutants and ozone precursors.

MITIGATION MEASURE. Mitigation Measure AQ-3.1 is proposed to reduce criteria air pollutant and ozone precursor emissions from construction of all project components; however, even with implementation of the mitigation measure, construction-related emissions associated with the Previously Proposed Project would still have the potential to exceed the 2011 BAAQMD significance thresholds. As such, cumulative construction-related air emissions would be *significant and unavoidable*.

AQ-10: Cumulative Criteria Air Pollutants and Ozone Precursor Emissions – Operational Activities. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities in the vicinity of the Previously Proposed Project and other development projects. BAAQMD considers impacts from projects that are capable of generating emissions with the potential to exceed the threshold of 54 pounds per day for ROG, NO_X, and PM2.5 and 82 pounds per day for PM10 to be significant. The Previously Proposed Project would generate emissions of these pollutants during operation. Even with the TDM, which is incorporated as a component of the Previously Proposed Project, the Previously Proposed Project's net increase in emissions would be greater than BAAQMD's thresholds for ROG, NO_X, and PM10. BAAQMD considers projects that would result in a significant criteria air pollutant impact on a project level to be projects that would also result in a cumulatively considerable contribution to regional criteria air pollutants. Therefore, operational activities associated with the Previously Proposed Project would contribute to a **significant** cumulative impact with respect to criteria air pollutants and ozone precursors.

MITIGATION MEASURE. Mitigation measures to further reduce VMT would not be feasible because, according to the transportation impact analysis, in order to further reduce VMT, the number of daily trips would need to be further reduced. The transportation impact analysis and URBEMIS models already reflect achievable reductions in VMT and/or trips with the implementation of a TDM program. Therefore, impacts would be *significant and unavoidable*.

AQ-11: Cumulative Exposure of Sensitive Receptors to PM2.5 and Toxic Air Contaminant Concentrations during Operation or Construction. The maximum potential cancer risk at any modeled onsite location is 3.00 per million. Although the unrefined cumulative cancer risk was below the regulatory threshold before the refined analysis (49.810 per million with the threshold of 100 per million), incorporation of the refined modeling for the amenities center results in a further decrease in the cumulative cancer risk. As analyzed in AQ-5, above, all individual stationary sources would result in less-than-significant impacts with respect to the childcare center, either through screening or refined analysis. Implementation of the above improvement measures would further reduce the cumulative impacts, which are expected to be below the respective thresholds for PM2.5, cancer risk, and non-cancer risk. Therefore, the Previously Proposed Project would result in *less-than-significant* impacts with respect to cumulative cancer, non-cancer, and PM2.5 impacts.

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¹⁸ Bay Area Air Quality Management District. 2011. *California Environmental Quality Act Air Quality Guidelines.* Thresholds of Significance. Updated May 2011.

¹⁹ Bay Area Air Quality Management District. 2011. *California Environmental Quality Act Air Quality Guidelines*. Updated May 2011.

²⁰ Bay Area Air Quality Management District. 2011. *California Environmental Quality Act Air Quality Guidelines.* Thresholds of Significance. Updated May 2011.

Impacts of Revised Project

Impacts Not to Be Evaluated

AQ-7: Objectionable Odors. None of the activities associated with the Previously Proposed Project would be likely to expose sensitive receptors to objectionable odors. Because the Revised Project would not change the anticipated types of uses, the Revised Project also would not include any of the listed land use types that could result in objectionable odors, nor would it include a new sensitive receptor that could be affected by offsite odor generation. Therefore, impacts related to exposure to objectionable odors during operation of the Revised Project would be *less than significant*, identical to that of the Previously Proposed Project.

Impacts to Be Evaluated

AQ-1: Consistency with Applicable Air Quality Plans. The recommended measure for determining project support of the primary goals of the 2010 CAP is consistency with BAAQMD-approved CEQA thresholds of significance. Therefore, if approval of a project would not result in significant and unavoidable air quality impacts after the application of all feasible mitigation, the project would be considered consistent with the 2010 CAP. The Revised Project is not consistent with the 2010 CAP because emissions associated with the Revised Project would be in excess of BAAQMD thresholds, as described under Impacts AQ-3 and AQ-4.

An additional method for demonstrating consistency with applicable air quality plans is for a project to demonstrate that the population or VMT assumptions contained in the CAP would not be exceeded and that the project would implement TCMs, as applicable. The Revised Project proposes minor changes to square footage by land use, resulting in a slight decrease in the overall daily vehicle trip generation rate and corresponding regional VMT compared with the Previously Proposed Project. The number of assumed employees and associated new residents would be the same as the number assumed under the Previously Proposed Project. The Revised Project would include the same TDM program as the Previously Proposed Project to reduce vehicular traffic. The transportation improvements associated with the TDM program are supportive of the TCMs that were identified in the 2005 Ozone Strategy as critical to attaining the California Clean Air Act ozone standard. However, as with the Previously Proposed Project, the Revised Project would increase the VMT figure assumed under the CAP. Therefore, the Revised Project would not conform to regional air quality plans and would have a significant impact on the implementation of state and federal air quality plans. Given the extensive TDM measures that are already included in the Revised Project, there are no additional feasible mitigation measures to further reduce impacts resulting from the increased VMT associated with the Revised Project. Therefore, because the increase in VMT cannot be further mitigated and emissions associated with the Revised Project would be in excess of BAAQMD thresholds, impacts would be significant and unavoidable. The Revised Project would not result in additional impacts compared with the Previously Proposed Project.

AQ-2: Violation of Particulate Matter Ambient Air Quality Standards. Construction activity associated with the Revised Project remains the same as that for the Previously Proposed Project, except for a minor increase in the amount of excavation to be conducted to accommodate the increased basement area for the Revised Project and a minor decrease in the amount of soil to be exported. The additional excavation would increase the total amount of excavation from 75,000 cubic yards to 77,250 cubic yards; however, the total amount of soil to be exported offsite would decrease from 40,000 to 32,400 cubic yards. Compared with the Previously Proposed Project, the increase in excavation and

decrease in hauling activities would be minor, resulting in minimal impacts related to emissions. Therefore, the Revised Project would not result in any additional impacts not previously considered. Without implementation of mitigation measures, the impact would be *potentially significant*, as with the Previously Proposed Project.

MITIGATION MEASURE. Mitigation Measure AQ-2.1, as presented in the certified Final EIR, would require implementation of all appropriate dust control measures recommended by BAAQMD. Inclusion of these measures in the construction contracts for future development at the Project Site would reduce construction-related air quality impacts to a *less-than-significant* level. The Revised Project would not result in any impacts beyond those identified in the EIR.

AQ-3: Compliance with BAAQMD CEQA Significance Criteria Regarding Construction-related Criteria Air Pollutants and Ozone Precursor Emissions. Construction activity associated with the Revised Project remains the same as that for the Previously Proposed Project, except for a minor increase in excavation and a minor decrease in soil export. Construction activity associated with the Revised Project would take place during one phase of construction only, a scenario that was analyzed in the EIR for the Previously Proposed Project. As shown in Table 3-4, above, maximum unmitigated construction emissions for one phase only would exceed BAAQMD's 54-pounds-per-day threshold of significance for ROG and NO_X.

Construction activities of the Previously Proposed Project were analyzed as starting in 2012 and ending in 2014. Fleet-averaged emissions factors for construction equipment have decreased since the EIR was completed because newer, more fuel-efficient construction equipment has replaced older, less-efficient equipment. The amount of excavation under the Revised Project would be slightly greater than what was disclosed in the EIR because of the increased basement size. Although fleet-averaged emissions factors for construction equipment would be lower, construction emissions are conservatively assumed to remain *significant* for the Revised Project.

MITIGATION MEASURES. The Revised Project, as with the Previously Proposed Project, would be required to implement Mitigation Measures AQ-3.1 (construction equipment emissions minimization) and AQ-3.2 (application of low-VOC coatings). However, as shown in Table 3-4, even with implementation of these mitigation measures, construction-related emissions would still exceed BAAQMD's significance thresholds for ROG and NOx, resulting in *significant and unavoidable* impacts. Regardless, the Revised Project would not result in any impacts beyond those identified in the EIR.

AQ-4: Compliance with BAAQMD CEQA Significance Criteria Regarding Operational Criteria Air Pollutants and Ozone Precursor Emissions. Criteria pollutant emissions result from traffic, area sources, and natural gas combustion associated with the operational activities of a project after buildout. Emergency generator testing would occur periodically during operation of the Revised Project, adding to the emission of criteria pollutants. However, only two emergency generators are included in the Revised Project; four emergency generators were proposed under the Previously Proposed Project. Thus, under the Revised Project, a slight decrease in stationary-source criteria pollutant emissions is expected compared with the Previously Proposed Project.

The Revised Project would result in the same total number of parking spaces as proposed under the Previously Proposed Project. All TDM measures associated with the Previously Proposed Project, as well as the commitment to seek LEED Gold or equivalent certification, are included in the Revised Project. Therefore, as with the Previously Proposed Project, the Revised Project would not exceed the threshold of 54 pounds per day for ROG, NO_X , or PM2.5.

Operational PM10 emissions generated by the Previously Proposed Project would exceed BAAQMD thresholds, as shown in Table 3-5. The total number of daily vehicle trips would decrease from 8,215 under the Previously Proposed Project to 8,087 under the Revised Project. This reduction in the number of vehicle trips (i.e., 128 trips) would, in turn, reduce overall vehicle emissions associated with the Revised Project. Regardless, even though there would be a slight decrease in operational emissions under the Revised Project, emissions would still exceed the threshold for PM10, resulting in a *significant* impact.

MITIGATION MEASURES. Given the extensive TDM measures already included in the Revised Project, there are no additional feasible mitigation measures that would further reduce impacts related to VMT. Although overall VMT under the Revised Project would decrease slightly compared with the Previously Proposed Project, because the impact cannot be further mitigated, impacts would remain *significant and unavoidable*. The Revised Project would not result in any impacts beyond those identified in the EIR.

AQ-5: Expose Sensitive Receptors to PM2.5 and Toxic Air Contaminant Concentrations during Operation or Construction.

Construction

The level of construction activity related to the Revised Project is anticipated to be slightly greater than that of the Previously Proposed Project (due to the increased basement size) but would occur during only one phase of construction instead of two. The childcare center associated with the Revised Project would not be operational concurrent with construction; therefore, these sensitive receptors would not be subject to construction-related cancer and non-cancer risks or PM2.5 exposure, as described in the EIR. All health risks and risks related to exposure to construction-related PM2.5 and toxic air contaminant (TAC) concentrations under the Revised Project would thus be below regulatory thresholds, resulting in *less-than-significant* impacts during construction.

Operation

A detailed analysis of risks to individual receptor locations on the Project Site under the Previously Proposed Project is provided in the EIR. The cancer risk for occupants of the childcare center were found to be below the 10-per-million threshold for an individual risk assessment of offsite as well as onsite operational emissions. Because the Revised Project proposes to include a childcare facility and two onsite emergency generators instead of four, as described in the EIR for the Previously Proposed Project, the cancer risk to onsite receptors would remain *less than significant*.

IMPROVEMENT MEASURES. Unlike the Previously Proposed Project, the Revised Project would not be subject to Mitigation Measure AQ-5.1, which would reduce the risk of exposure during construction. Under the Revised Project, because construction would occur only during one phase, sensitive receptors would not be present on the Project Site during the construction period; therefore, mitigation is not required. Although operational impacts would also be less than significant, as with the Previously Proposed Project, the Improvement Measures described in the EIR would still apply. These improvement measures are designed to further reduce health risks at the childcare facility due to emergency generator testing. The Revised Project would not result in any impacts beyond those identified in the EIR.

AQ-6: Carbon Monoxide Compliance with State and Federal Ambient Air Quality Standards. The Revised Project is anticipated to result in a slight decrease in the total number of daily trips compared with the Previously Proposed Project. The Revised Project would result in the same number of employees and new residents as the Previously Proposed Project. The Revised Project proposes the same number of parking stalls as the Previously Proposed Project. Localized carbon monoxide impacts are determined by the number of vehicles queuing at any given intersection. Although AM Peak Hour traffic would increase slightly under the Revised Project, PM Peak Hour traffic and the total number of daily trips generated by the Revised Project would decrease slightly compared with the Previously Proposed Project. Therefore, the Revised Project would result in no additional impacts with respect to carbon monoxide emissions. As with the Previously Proposed Project, impacts related to carbon monoxide concentrations are considered to be *less than significant*.

AQ-8: Consistency with Applicable Air Quality Plans. The Revised Project would result in a slight decrease in daily vehicle trip generation; the number of employees would remain the same as under the Previously Proposed Project. Regional VMT calculations are based on these numbers; therefore, VMT impacts would remain relatively the same as those of the Previously Proposed Project. The Revised Project would result in no additional impacts with respect to plan consistency. As with the Previously Proposed Project, the Revised Project's contribution to conflicting with or obstructing implementation of the CAP is significant; the cumulative effects with the Revised Project would be **significant**.

MITIGATION MEASURE. The increase in VMT could not be further mitigated for the Revised Project, resulting in *significant and unavoidable* impacts.

AQ-9: Cumulative Criteria Air Pollutants and Ozone Precursor Emissions – Construction Activities. Development of the Revised Project could result in the 2011 BAAQMD thresholds of significance for ROG and NO_X being exceeded during construction. BAAQMD considers projects that would result in a significant criteria air pollutant impact on a project level to be projects that would also result in a cumulatively considerable contribution to regional criteria air pollutants.²² Therefore, construction activities associated with the Revised Project would contribute to a *significant* cumulative impact related to criteria air pollutants and ozone precursors.

MITIGATION MEASURE. Mitigation Measure AQ-3.1 is proposed to reduce criteria air pollutant and ozone precursor emissions from construction of all components of the Revised Project. However, even with implementation of the mitigation measure, construction-related emissions associated with the Revised Project would still have the potential to exceed the 2011 BAAQMD significance thresholds. As such, cumulative construction-related air emissions would remain *significant and unavoidable*. The Revised Project would not result in any cumulative impacts beyond those identified in the EIR.

AQ-10: Cumulative Criteria Air Pollutants and Ozone Precursor Emissions – Operational Activities. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities in the vicinity of the Revised Project and other development projects. As shown above in Table 3-5, even with the TDM mitigation measures that were incorporated as a

²¹ Hexagon Transportation Consultants, Inc. 2016. Traffic Analysis and Site Plan Review of the CEQA Addendum for the 300 Airport Boulevard Project in Burlingame, California. June 13, 2016. Included as Appendix A of this document.

²² Bay Area Air Quality Management District. 2011. *California Environmental Quality Act Air Quality Guidelines*. Thresholds of Significance. Updated May 2011.

component of the Revised Project (which are the same as for the Previously Proposed Project), the net increase in emissions under the Revised Project would be greater than BAAQMD's thresholds for ROG, NO_X, and PM10. Although area-source emissions, as shown in Table 3-5, would decrease under the Revised Project because fewer emergency generators would be required compared with the Previously Proposed Project (i.e., two generators instead of four), cumulative emissions would still be greater than BAAQMD's thresholds for ROG, NO_X, and PM10. BAAQMD considers projects that would result in a significant criteria air pollutant impact on a project level to be projects that would also result in a cumulatively considerable contribution to regional criteria air pollutants.²³ Therefore, operational activities associated with the Revised Project would result in a *significant and unavoidable* cumulative impact related to criteria air pollutant and ozone precursors. The Revised Project would not result in any cumulative impacts beyond those identified in the EIR.

AQ-11: Cumulative Exposure of Sensitive Receptors to PM2.5 and Toxic Air Contaminant Concentrations during Operation or Construction. The Previously Proposed Project identified all existing and foreseeable operational TAC and PM2.5 sources within 1,000 meters of the Project Site boundary. These sources have not changed, except for the decrease in the number of emergency generators, as described under Impact AQ-4 and Impact AQ-5 for the Revised Project. The cumulative impacts of the Revised Project would add to the impacts related to the existing stationary source and background traffic. The Previously Proposed Project would not exceed the cumulative thresholds for cancer and non-cancer risk or PM2.5 concentrations. Because the sources of TAC and PM2.5 have not changed between the Previously Proposed Project and the Revised Project, the Revised Project would not exceed the cumulative thresholds for cancer and non-cancer risk or PM2.5 concentrations. Therefore, the Revised Project would result in *less-than-significant* impacts with respect to cumulative cancer, non-cancer, and PM2.5 impacts. Consequently, no new impacts are identified.

Climate Change

Summary of Previously Proposed Project

CC-1: Generation of Greenhouse Gas Emissions

Construction

The Previously Proposed Project would generate greenhouse gas (GHG) emissions during the construction period related to the operation of construction equipment. Construction of the Previously Proposed Project could be implemented in a single phase or two separate phases. As shown in Table 3-6, the multi-phase construction scenario would generate slightly more GHG emissions than the single-phase construction scenario.

To reduce construction-related GHG emissions, the Project Sponsor for the Previously Proposed Project committed to achieving a 75 percent or greater construction waste diversion factor, exceeding the 60 percent diversion factor mandated in the City's Construction and Demolition Recycling Requirements (Ordinance No. 1704). In addition, construction of the Previously Proposed Project would utilize regional cradle-to-cradle building materials, recycled materials for the base buildings (e.g., aggregate, concrete and steel, etc.), and sustainably harvested wood products when available. Therefore, construction-related GHG emissions would be *less than significant*.

²³ Bay Area Air Quality Management District. 2011. *California Environmental Quality Act Air Quality Guidelines.* Thresholds of Significance. Updated May 2011.

Table 3-6. Comparison of Construction-Related GHG Emissions

	Multi-Phase Cons	truction Scenario	Single-Phase Construction Scenario
	Phase I GHG Emissions (MT CO2e/year)	Phase II GHG Emission (MT CO2e/year)	GHG Emission (MT CO2e/year)
	1,538.64	2,393.63	4,774.63
Totals	3,932.28		4,774.63

Source: Atkins, 2011. Based on URBEMIS 2007, version 9.2.4.

Note: Result has been converted from short tons (as presented in URBEMIS) to metric tons, refer to Appendix F of the Draft EIR for further detail.

MT CO_2e = metric tons of carbon dioxide equivalent

IMPROVEMENT MEASURE. Although impacts would be less than significant, an Improvement Measure has been recommended to further reduce construction-related GHG emissions. This Improvement Measure involves alternative-fueled vehicles in the construction fleet and building materials from local sources in order to reduce GHG emissions from construction activities.

Operational

The Previously Proposed Project would implement a TDM program in order to reduce the number of vehicle trips. The TDM program would reduce the daily trip rate by approximately 13 percent than implementation of the Previously Proposed Project without TDM measures. Because many of the project-specific design features provided by the Project Sponsor for the Previously Proposed Project did not contain the level of detail necessary to estimate associated reductions in GHG emissions, with the exception of the TDM program, the Previously Proposed Project was modeled without incorporation of project-specific sustainability features. Instead, the project-specific sustainability features were recommended as mitigation measures so that numeric values could be assigned to them, thereby making associated reductions in GHG emissions quantifiable.

The unmitigated Previously Proposed Project would result in the generation of approximately 18,028.79 metric tons of carbon dioxide equivalent (MT $CO_{2}e$) per year, as shown in Table 3-7. When considered on per-service-population basis, the Previously Proposed Project would generate approximately 7.28 MT $CO_{2}e$ per employee (based on a total of 2,475 employees under the office scenario, which is the most conservative assumption for the Previously Proposed Project). Therefore, operation of the Previously Proposed Project would exceed the BAAQMD threshold for GHG emissions of 4.6 MT $CO_{2}e$ per service population and result in a *significant* impact.

Table 3-7. Summary of Operational GHG Emissions from the Previously Proposed Project

Source of Emissions	Unmitigated GHG Emission (MT CO2e/year)	Mitigated GHG Emissions (MT CO ₂ e/year)
Transportation	10,858.2a	9,484.31
Area Sources	1.14	1.14
Electricity	3,609.30	2,379.30
Natural Gas	1,097.20	812.0
Water and Wastewater	125.73	62.10
Solid Waste	2,337.22	2,103.50
Agriculture	0.00	0.00
Off-Road Equipment	0.00	0.00
Refrigerants	0.00	0.00
Sequestration	N/A	0.00
Emission Credits	N/A	0.00
Totals	18,028.79	14,842.35

Source: Atkins, 2011. Based on BAAQMD Greenhouse Gas Model (BGM). Version 1.1.9 (beta). *Note:*

MITIGATION MEASURES. Implementation of Mitigation Measures CC-1.1 through CC-1.8 would reduce GHG emissions associated with operation of the Previously Proposed Project. These measures would incorporate: GHG reduction measures for maintenance activities, vegetation into Project design, renewable energy system, drought-tolerant landscaping, cool roof material, water conservation measures, emergency efficiency beyond Title 24 standards, and operational solid waste reductions. Implementation of the recommended mitigation measures would reduce operational climate change impacts from the Previously Proposed Project but would not reduce GHG emissions below the BAAQMD threshold of 4.6 MT CO₂e per service population. Operation of the Previously Proposed Project with mitigation and the TDM program would result in approximately 6.00 MT CO₂e per year. Therefore, the GHG emissions of the Previously Proposed Project, as well as the Previously Proposed Project's contributions to global climate change, would remain *significant* and unavoidable.

CC-2: Conflict with Applicable Plans, Policies, or Regulations Regarding a Reduction in GHG Emissions. As described in applicable plans and regulations, the City adopted a CAP in 2009 to identify methods to reduce local GHG emissions. The Previously Proposed Project would exceed BAAQMD's threshold for operational GHG emissions, even with implementation of the mitigation measures identified under Impact CC-1, above. Therefore, it would inhibit the City with respect to meeting the short- and long-term GHG reduction goals established in the CAP. Implementation of the Previously Proposed Project would result in a *significant and unavoidable* impact related to state and local GHG reduction plans, policies, and regulations.

a. This value was derived by increasing transportation sector GHG emissions by 13 percent to reflect operation of the Previously Proposed Project without the TDM program. This was done manually because, as described above, the inputs used in BGM to generate estimated operational GHG emissions incorporated the TDM program.

Cumulative Impacts. The analysis of the Previously Proposed Project's climate change impact, discussed above, is an analysis of its contribution to a cumulatively significant global impact through the emission of GHGs. The cumulative impacts of the Previously Proposed Project, with respect to the issue of climate change, are therefore captured in the project-level analysis, and no further cumulative analysis is necessary.

Impacts of Revised Project

CC-1: Generation of Greenhouse Gas Emissions

Construction

All construction activities associated with the Revised Project would occur during one phase of construction. The single-phase construction scenario, as described and modeled in the EIR, would generate approximately 4,775 MT CO₂e per year of construction. The Revised Project would result in a slight increase in excavation but a decrease in soil export. Therefore, it is expected that GHG emissions associated with construction of the Revised Project would be similar to those of the Previously Proposed Project. However, to reduce construction-related GHG emissions, the Project Sponsor has committed to achieving a 75 percent or greater waste diversion factor. Although not required, the Revised Project could also implement the Improvement Measure recommended for the Previously Proposed Project, which would result in at least 15 percent of construction vehicles and equipment using alternative fuels. Furthermore, the Project Sponsor shall ensure that a minimum of 10 percent of building materials are locally sourced, where feasible. Therefore, as with the Previously Proposed Project, the Revised Project's construction-related GHG emissions would be *less than significant*.

Operational

Direct emissions from traffic and area sources and indirect emissions from energy, water use, wastewater, and waste management would occur every year after buildout of the Revised Project. Overall emissions from the Revised Project would be slightly lower compared with the Previously Proposed Project because of a slight decrease in motor vehicle emissions. Monthly emergency generator testing would also occur. Project-specific information from the Previously Proposed Project analysis has not changed with respect to total square footage for all buildings, type of building use, and the total number of parking spaces. However, only two emergency generators are included in the Revised Project rather than four, as proposed under the Previously Proposed Project. Small changes in the design of each building, as well as the materials used in the construction of each building, would result in minor changes in the Revised Project's operational GHG emissions. All other sources of GHG emissions associated with the Previously Proposed Project would remain the same under the Revised Project. Although the number of vehicle trips and emergency generators would decrease, it is conservatively assumed that operation of the Revised Project would exceed the BAAQMD threshold for GHG emissions (i.e., 4.6 MT CO₂e per service population), resulting in a *significant* impact, similar to that of the Previously Proposed Project.

MITIGATION MEASURES. The Revised Project would still implement the TDM measures included in the Previously Proposed Project and seek LEED Gold or equivalent certification. The Revised Project would also include energy conservation measures and sustainable design strategies, as described in the EIR under Mitigation Measures CC-1.1 through CC-1.8. Therefore, GHG emissions under the Revised Project would remain *significant and unavoidable* but would not result in any impacts beyond those identified in the EIR.

CC-2: Conflict with Applicable Plans, Policies, or Regulations Regarding a Reduction in GHG Emissions. The City of Burlingame adopted a CAP in 2009 to identify methods to reduce local GHG emissions. The CAP is designed to meet the requirements mandated by Assembly Bill 32 (i.e., to reduce emissions by 15 percent levels measured in 2005 by 2020 and achieve an 80 percent reduction by 2050). The Previously Proposed Project and the Revised Project would comply with the reduction measures and recommendations identified in CAP Phase I: High-Impact GHG Reduction Programs for Implementation Prior to 2012. A complete list of the Revised Project's energy conservation strategies is provided in Mitigation Measures CC-1 through CC-8. However, the Previously Proposed Project and the Revised Project would exceed BAAQMD's threshold for operational GHG emissions, even with implementation of Mitigation Measures CC-1 through CC-8. Therefore, it would inhibit the City in meeting the short- and long-term GHG reduction goals established in the CAP. Implementation of the Revised Project would result in a *significant and unavoidable* impact related to state and local GHG reduction plans, policies, and regulations but would not result in any impacts beyond those identified in the EIR.

Cumulative Impacts. The analysis of the Revised Project's climate change impact, discussed above, is an analysis of the Revised Project's contribution to a cumulatively significant global impact through its emission of GHGs. The cumulative impacts of the Revised Project, with respect to the issue of climate change, are therefore captured in the project-level analysis, and no further cumulative analysis is necessary.

Noise

Summary of Previously Proposed Project

NO-1: Permanent Increase in Ambient Noise Levels During Construction. The closest sensitive receptors to the Project Site include the intermittent users of the Bay Trail and Fisherman's Park, which is approximately 400 feet north of the Project Site. The City Noise Ordinance prohibits the generation of construction noise between the hours of 8:00 p.m. and 7:00 a.m. Monday through Saturday and between the hours of 6:00 p.m. and 10:00 a.m. Sundays and holidays. No nighttime construction would be required for the Previously Proposed Project; therefore, construction would be in compliance with the noise ordinance.

The Previously Proposed Project would require the use of typical construction equipment, including large machinery for earthwork, one or two pile-driver rigs, large concrete pumps, concrete trucks, large cranes for steel and exterior façade installation, and typical delivery vehicles and small trucks. The Noise Element of the City General Plan establishes allowable noise levels for individual pieces of construction equipment. The City's allowable noise levels for construction could be achieved with feasible control measures. Noise control devices (e.g., mufflers), quieter machinery, and other noise control measures (e.g., surrounding stationary equipment with noise barriers), none of which would require a major equipment redesign, could be used during construction. Additionally, construction impacts would be temporary and would cease upon completion of construction. However, without implementation of best management practices (BMPs) related to construction equipment, the operation of such equipment would have the potential to generate noise levels that would exceed the general plan standards for individual pieces of equipment.

Temporary impacts during construction could result in a temporary increase in ambient noise levels in the vicinity of the Previously Proposed Project, resulting in a *potentially significant impact*.

MITIGATION MEASURE. Implementation of the BMPs listed in Mitigation Measure NO-1.1 (implement best management practices to reduce construction noise) would reduce temporary construction noise impacts to *less-than-significant* levels.

NO-2: Exposure of Persons to Excessive Ground-borne Vibration Levels during Construction. Activities that typically cause substantial ground vibration, such as pile driving, are proposed for the Previously Proposed Project. The closest residential uses are located approximately 0.25 mile (1,320 feet) south of the Project Site, across US 101. These are located behind existing buildings and roadway infrastructure. Vibration levels from construction activities, including pile driving, would not exceed 80 vibration decibels (VdB) at a distance of 1,320 feet or result in sleep disturbance. At this distance, construction vibration would not result in any building damage. Therefore, impacts related to the exposure of residential areas to or the generation of excessive ground-borne vibration or ground-borne noise levels would be less than significant.

The closest land uses to the Project Site include existing light-industrial buildings and warehouses to the south along Beach Road and office buildings to the west across Sanchez Channel. Office buildings are generally not sensitive to vibration; however, industrial buildings may include vibration-sensitive equipment that would be disturbed by vibration levels greater than 65 VdB. The nearest industrial uses are adjacent to the southern border of Project Site. Construction equipment for general construction activities and pile driving would have the potential to exceed 65 VdB at 25 feet.

If pile driving were to result in vibration levels in excess of the Federal Transit Administration (FTA) damage threshold of 0.2 inch per second (in/sec) to 0.5 in/sec, the Previously Proposed Project could result in damage to adjacent structures. Pile driving associated with the Previously Proposed Project would generate vibration levels above 0.5 in/sec at a distance of 25 feet, but peak vibration levels during pile driving would be below the FTA threshold at a distance of 100 feet.

Pile driving would be required only during construction of building foundations. Although the closest offsite uses are within 25 feet of the proposed parking structure, it is assumed that modern building practices were used during construction of the existing buildings; therefore, the existing buildings would most likely be able to withstand the limited duration of pile driving required for construction of the parking structure. However, existing buildings are within the screening distance for potential structure damage; therefore, vibration from construction activities would have the potential to result in damage to existing offsite buildings. This would be a *significant* impact.

MITIGATION MEASURES. Implementation of Mitigation Measures NO-2.1 through NO-2.3 would reduce construction-related impacts to a *less-than-significant* level. Mitigation Measure NO-2.1 would require the notification of nearby businesses of potential impacts to vibration-sensitive equipment. Implementation of BMPs, as described in Mitigation Measure NO-2.2, would help reduce impacts to any buildings identified with vibration-sensitive equipment. Mitigation Measure NO-2.3 would require the use alternative pile driving methods for piles driven within proximity of existing vibration receptors in order to reduce vibration levels at the receptors to meet significance thresholds.

NO-3: Exposure of People to Excess Traffic Noise. Areas along the main access routes to the Project Site would experience an increase in traffic noise levels associated with operation of the Previously Proposed Project. In addition, daily operation of new office uses would generate noise from new stationary sources (e.g., noise from heating, ventilation, and air-conditioning [HVAC] systems; vehicle noise from parking lots and structures; and noise associated with the delivery of supplies).

The Noise Element of the City General Plan establishes 65 A-weighted decibels (dBA), Community Noise Equivalent Level (CNEL), as the maximum outdoor noise level for land uses such as shopping centers, self-generative business, commercial districts, offices, banks, clinics, hotels, and motels. New construction or development should not be undertaken in noise environments that exceed 80 dBA CNEL and contain residential and commercial land uses. Also, the City General Plan states that a new project cannot cause an increase in the ambient noise level of more than 5 dBA at the property line.²⁴ According to the Community Standards for Noise Impacts from the Bayfront Specific Plan, which contains the City's goals and development policies for growth and expansion in the Bayfront Area, land uses in the planning area shall not increase noise levels at the property line by more than 5 dBA. Under current conditions, the average daily noise environment at the Project Site is 65 dBA; therefore, an increase in noise to a level above 70 dBA would be considered a substantial increase.

Trucks used for deliveries would result in intermittent noise (e.g., from idling engines or backup warning signals). However, truck deliveries would be required to comply with the restrictions on hours of operation established in the City Noise Ordinance. Compliance with the City Noise Ordinance would reduce nuisance noise from truck deliveries to a less-than-significant level.

Operation of the Project Site would result in an increase in traffic volumes, which could increase ambient noise levels at noise-sensitive locations along major vehicular access routes. However, development of the Project Site would not have the potential to generate noise levels that would exceed the adopted threshold for a substantial permanent increase in traffic noise. Traffic noise modeling for areas along major access routes shows a noise level increase of 0.3 dBA to 2.2 dBA under the Previously Proposed Project, which is below the threshold (i.e., a 5 dBA increase). Therefore, the Previously Proposed Project would not expose people to excessive traffic noise, resulting in a *less-than-significant* impact.

NO-4: Increase in Ambient Noise Levels during Operation. Activities associated with daily operation of the Previously Proposed Project would generate noise levels that would be comparable to noise levels in a typical office park environment. The typical noise level for commercial areas is approximately 65 dBA.²⁵ Therefore, activities associated with the Previously Proposed Project would not exceed 70 dBA and would not result in a substantial increase in the ambient noise level. However, the new buildings and parking structure would require new HVAC systems. Mechanical HVAC equipment located on the ground or the rooftops of new buildings would have the potential to generate noise levels that would average 72 dBA CNEL at a distance of 50 feet when operating continuously for 24 hours²⁶ or 70 dBA CNEL when operating at a distance of 60 feet. Therefore, HVAC systems would have the potential to exceed 70 dBA if they were to be located within 60 feet of the Project Site boundary. The amenities center would be located within 60 feet of the site boundary. If HVAC systems on the office buildings or the amenities center would be located within 60 feet of potential receptors on the Project Site boundary, the Previously Proposed Project would have the potential to exceed 70 dBA at the boundary and result in a 5 dBA increase compared with current ambient conditions. However, as part of the Previously Proposed Project, all HVAC mechanical equipment would be located more than 60 feet from the nearest property line. In addition, sound treatments, screens with metal louvers, and integral glass fiberreinforced concrete (GFRC) exterior walls would be included as part of the Previously Proposed Project.

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²⁴ City of Burlingame. 1975. *Burlingame General Plan.* Noise Element, adopted by City Council Resolution 69-75, September 15, 1975, p. 28.

²⁵ California Department of Transportation. 1998. *Technical Noise Supplement to the Traffic Noise Analysis Protocol.* October.

²⁶ City of Santa Ana. 2010. *City of Santa Ana Transit Zoning Code (SD 84A and SD 84B) Final Environmental Impact Report (SCH No. 2006071100)*. Prepared by Atkins. May.

These noise enclosures for rooftop mechanical equipment would reduce ground-level noise levels to 70 dBA CNEL or less. As such, this impact would be less than significant. Four emergency generators would be installed as part of the Previously Proposed Project. The units would require monthly testing. However, noise from the generators would be temporary and intermittent in nature and would not increase ambient noise levels, resulting in less-than-significant impacts.

Development on the Project Site would include a parking structure in the southwestern corner of the site; underground parking under Buildings B1, B2, B3, and B4; and surface parking along Airport Boulevard. Noise from parking areas is characterized as temporary and periodic. Noise from these temporary and periodic noise sources across the Project Site would be different in kind, time, duration, and location; therefore, the overall effects would be separate and, in most cases, would not affect the same receptors at the same time. The type of noise associated with parking structures is considered a nuisance noise effect, resulting in a less-than-significant impact.

As discussed under Impact NO-3, above, general deliveries would be conducted at drop-off areas close to the entrances at all buildings. Trucks used for deliveries would result in intermittent noise (e.g., idling engines or backup warning signals). However, truck deliveries would be required to comply with the restrictions on hours of operation established in the City's Noise Ordinance. Compliance with the City Noise Ordinance would reduce nuisance noise from truck deliveries to a less-than-significant level.

As discussed above, noise from daily operational activities, parking lots, and general deliveries would not exceed the noise standards established by the City General Plan, Bayfront Specific Plan, or Municipal Code; these impacts would be less than significant. However, as part of the Project, all HVAC equipment would be provided with sound treatments, screens with metal louvers, and integral GFRC exterior walls to reduce ground-level noise levels to 70 dBA CNEL or less. As such, this impact would be *less than significant*.

NO-5: Airport Noise. The Project Site is not located within the vicinity of a private airstrip but is located within the Airport Land Use Plan (ALUP) for San Francisco International Airport (SFO). The site is exposed to both overflight and backblast noise from aviation traffic. However, the Project Site does not fall in the 65 dB CNEL, or higher, contours for noise generated by aircraft landing or taking off from the airport, indicating that airport noise at the Project Site should be less than 65 dB.²⁷ Noise generated from traffic along US 101 is a greater concern than aircraft noise in the area. Therefore, employees working at the Project Site would not be exposed to excessive aircraft noise levels, resulting in a *less-than-significant* impact.

NO-6: Cumulative Construction Noise. Noise levels from construction of other foreseeable development in the city would generally not combine to result in the exposure of people to a substantial temporary increase in ambient noise levels during construction because of the localized nature of construction noise impacts and the fact that construction throughout the city would not occur at the same time. All the other projects would be located more than 1 mile from the Project Site. At this distance, even unabated noise from pile driving would be reduced to below 55 dBA. Therefore, construction noise from the Previously Proposed Project in combination with other projects would not expose sensitive receptors to a substantial increase in ambient noise levels. As such, the Project's cumulative impact would be *less than significant*.

NO-7: Cumulative Vibration Impacts. Vibration levels from construction of other development in the city would generally not combine to result in the exposure of people to or the generation of excessive ground-borne vibration because of the localized nature of vibration impacts and the fact that

²⁷ San Mateo County. 1996. *Comprehensive Airport Land Use Plan*. December.

construction throughout the city would not occur at the same time. High levels of ground-borne vibration at each of the construction sites would continue to be isolated and would affect only receptors within proximity to individual pieces of construction equipment. All the other projects would be located more than 1 mile from the Project Site. As such, the vibration impact of the Previously Proposed Project in combination with vibration from other development would be *less than significant*.

NO-8: Cumulative Operational Noise. The significance of the Previously Proposed Project's total operational noise impact is based on its incremental increase in noise levels in the vicinity. Other development would not result in a substantial increase in noise levels. Therefore, the Previously Proposed Project's cumulative impact would be less than significant.

Operation of other development projects would also have the potential to increase ambient noise levels. These projects consist of residential development, commercial and office development, and an animal shelter. The increased noise levels from these projects would not be expected to exceed existing ambient noise levels because of heavy traffic and existing similar uses. Noise from HVAC systems would diminish to below existing noise levels at a short distance from the Project Site. Parking lot noise and truck deliveries would be intermittent throughout the city. Therefore, these noise sources would not combine to exceed noise standards, resulting in *less-than-significant* cumulative impacts.

NO-9: Cumulative Airport Noise. Impacts related to aircraft noise are generally site specific because development of one project would not affect whether or not another project would be within an airport noise contour. However, if the cumulative projects would allow for development of new sensitive receptors within incompatible airport noise level contours, a cumulative impact could occur. The cumulative projects are located farther from the SFO than the Previously Proposed Project. The Previously Proposed Project would not expose people to excessive airport noise. Therefore, a cumulative impact would not occur, resulting in *no impact*.

Impacts of Revised Project

Impacts Not to Be Evaluated

There would be no additional impacts related to noise from airports, beyond those identified in the certified Final EIR, as a result of the Revised Project.

NO-5: Airport Noise. The Project Site does not fall within the 65 dB CNEL, or higher, contour for noise generated by aircraft landing or taking off at SFO, indicating that airport noise at the Project Site should be less than 65 dB.²⁸ Because the Revised Project is proposed to be developed at the same site as the Previously Proposed Project, employees working at the Project Site would not be exposed to excessive aircraft noise levels, resulting in a **less-than-significant** impact. Impacts related to airport noise under the Revised Project would be the same as those of the Previously Proposed Project.

NO-9: Cumulative Airport Noise. With the exception of the 1300 Bayshore Highway project, other development projects in the city are located farther from SFO. The Previously Proposed Project would not expose people to excessive airport noise, and because the Revised Project would be developed at the same site as the Previously Proposed Project, people working at the Project Site would not be exposed to excessive aircraft noise levels. Although other cumulative projects are closer to SFO, the Revised Project's contribution to exposure to airport noise is not considerable. Therefore, cumulative impacts related to airport noise under the Revised Project would be the same as those of the Previously Proposed Project, resulting in a *less-than-significant* impact.

²⁸ San Mateo County, *Comprehensive Airport Land Use Plan*. November 2012.

Impacts to Be Evaluated

As with the Previously Proposed Project, the Revised Project would have the potential to cause noise impacts within the immediate area of the Project Site; the potential also exists for the Revised Project to be affected by existing noise sources. The Revised Project includes revisions to construction schedules and activities, a revised configuration and location for parking, revised and redesigned onsite outdoor activity areas, and possible relocation of emergency generators and HVAC units, which include the use of enclosures. In addition, slight changes to the uses within the buildings (i.e., office, retail, food/beverage, and other amenities) would result in changes regarding the number of daily vehicle trips to and from the Project Site. In general, the Revised Project would result in 43 additional trips in the AM Peak Hour, 18 fewer trips in the PM Peak Hour, and 128 fewer daily trips compared with the Previously Proposed Project. These revisions are discussed below.

NO-1: Permanent Increase in Ambient Noise Levels during Construction. The closest sensitive receptors to the Project Site include intermittent users of the Bay Trail, which runs along the edges of the Project Site. and Fisherman's Park, which is approximately 400 feet north of the Project Site. As with the Previously Proposed Project, no nighttime construction would be required for the Revised Project; therefore, construction would be in compliance with the City's Noise Ordinance. However, without implementation of BMPs for construction equipment, operation of construction equipment would have the potential to generate noise levels that would exceed the City General Plan standards for individual pieces of equipment. Temporary impacts during construction could result in a temporary increase in ambient noise levels in the vicinity of the Revised Project, resulting in a potentially significant impact. The same construction equipment described for the Previously Proposed Project would be used for the Revised Project; however, a minor increase in excavation and a minor decrease in material hauling are assumed with the Revised Project. Therefore, the Revised Project would not result in any new impacts beyond what was identified in the Previously Proposed Project Final EIR. As with the Previously Proposed Project, the Revised Project would result in temporary increases in ambient noise levels, resulting in a **potentially significant impact**.

MITIGATION MEASURE. Implementation of the BMPs listed in Mitigation Measure NO-1.1, as presented in the EIR, would reduce temporary construction noise impacts to *less-than-significant* levels. The Revised Project would not result in any impacts beyond what was identified in the EIR.

NO-2: Exposure of Persons to Excessive Ground-borne Vibration Levels during Construction. Ground-borne vibration would occur during construction at the Project Site as a result of construction activities associated with the Revised Project. Activities that typically cause substantial ground vibration, such as pile driving, are proposed for the Revised Project. Of the construction equipment to be used onsite, trucks, pile-driving equipment, and bulldozers are the most likely to produce perceptible vibration in nearby locations. The use of pile-driving equipment and bulldozers under the Revised Project is the same as described under the Previously Proposed Project.

There would be a slight increase in the number of pieces of construction equipment that would most likely produce perceptible vibration. However, due to distance, impacts related to the exposure of residential areas to or the generation of excessive ground-borne vibration or ground-borne noise levels with the Revised Project would remain less than significant. Construction equipment for general construction activities and pile driving associated with the Revised Project would have the potential to exceed 65 VdB at 25 feet. Vibration from construction activities related to the Revised Project would have the potential to result in damage to existing offsite buildings. This would be a *significant* impact.

MITIGATION MEASURES. Mitigation Measure NO-2.1, as presented in the EIR, would require the notification of nearby businesses of potential impacts on vibration-sensitive equipment in order to identify any such equipment in the vicinity of the Revised Project and implementation of BMPs, as described in Mitigation Measure NO-2.2 and presented in the EIR, to help reduce impacts on any buildings with vibration-sensitive equipment. Mitigation Measure NO-2.3, as presented in the EIR, would require the use alternative pile-driving methods (e.g., drilled or steel piles) for piles driven within proximity of existing vibration receptors in order to reduce vibration levels at the receptors and meet significance thresholds. Implementation of these measures would reduce construction-related impacts on vibration-sensitive equipment to a *less-than-significant* level. The Revised Project would not result in any impacts beyond what was identified in the EIR.

NO-3: Exposure of People to Excess Traffic Noise. As with the Previously Proposed Project, traffic noise levels along the main access roads to the Project Site would increase with operation of the Revised Project. Daily operation of new office uses would generate noise from new stationary sources (e.g., noise from HVAC systems; vehicle noise from parking lots and structures; and noise associated with the delivery of supplies).

As described above, the Revised Project would result in fewer daily and PM Peak-Hour trips but a slight increase in the number of AM Peak-Hour trips. Regardless, the change in traffic volumes, compared with the Previously Proposed Project, would be minor and would not be expected to result in a perceivable change with respect to traffic noise. In addition, as explained above, implementation of the Previously Proposed Project would result in traffic noise levels that would be below the threshold. The addition of 45 AM Peak-Hour trips would not exceed the threshold on major access routes in the vicinity of the Project Site.

Projected noise levels from surface parking lots and structures associated with the Revised Project would change because of the decrease in the number of surface parking spaces and the increase in the number of parking spaces in the parking structure compared with the Previously Proposed Project. Thus, a corresponding decrease in noise from the surface parking lot and an increase in noise from the parking structure is anticipated. Because the Revised Project would include the same total number of parking spaces as the Previously Proposed Project, there would be no new or worsened impacts related to noise from parking lots and structures. The locations of loading docks associated with the four office buildings would change with the Revised Project to create a more direct path for delivery trucks. However, the number of truck deliveries associated with the Revised Project would be the same as discussed in the Previously Proposed Project certified Final EIR, and all truck deliveries would still be required to comply with the restrictions on hours of operation established in the City Noise Ordinance.

Development on the Project Site would not have the potential to generate noise levels that would exceed the adopted threshold for a substantial permanent increase in traffic noise. Therefore, this impact would be *less than significant*. Given the discussion above, the Revised Project would not introduce a new or more significant impact related to traffic noise.

NO-4: Increase in Ambient Noise Levels during Operation. As described in the EIR for the Previously Proposed Project, mechanical HVAC equipment units would be located on the tops of buildings and in the basement of the parking structure. HVAC units associated with the Revised Project are assumed to be located in the same locations as described for the Previously Proposed Project. Under the Previously Proposed Project, all HVAC mechanical equipment would be located more than 60 feet from the nearest property line; this requirement would apply to HVAC equipment associated with the Revised Project.

Two emergency generators would be installed as part of the Revised Project, compared with four under the Previously Proposed Project. The unit would require monthly testing. Noise from the generator would be temporary and intermittent in nature and would not increase ambient noise levels associated with the Revised Project. Because there would be a decrease in the number of generators (i.e., four under the Previously Proposed Project; two under the Revised Project), noise produced by generators would decrease with the Revised Project and would continue to be less than significant.

The Previously Proposed Project included a parking structure, underground parking, and surface parking. The total number of parking spaces associated with the Previously Proposed Project is equal to the total number of parking spaces included under the Revised Project. Because noise from parking areas is characterized as temporary and periodic noise, it is considered a nuisance noise effect. Similar to the Previously Proposed Project, the impact would be less than significant under the Revised Project. Truck deliveries would be required to comply with the restrictions on hours of operation established in the City Noise Ordinance. With respect to the Revised Project, compliance with the City Noise Ordinance would reduce nuisance noise from truck deliveries to a less-than-significant level.

As discussed above, noise from daily operational activity, parking lot noise, and general deliveries would not exceed the noise standards established by the City General Plan, Bayfront Specific Plan, or Municipal Code; these impacts would be less than significant. However, as part of the Revised Project, all HVAC equipment shall be provided with sound treatments, screens with metal louvers, and integral GFRC exterior walls to reduce ground-level noise levels to 70 dBA CNEL or less. As such, there would be no new or more significant impact under the Revised Project. This impact would be *less than significant*.

NO-6: Cumulative Construction Noise. Noise levels from construction of other foreseeable development in the city would generally not combine to result in the exposure of people to a substantial temporary increase in ambient noise levels during construction of the Revised Project because of the localized nature of construction noise impacts. All other foreseeable development projects are located more than 0.5 mile from the Project Site. At this distance, even unabated noise from pile driving would be reduced to below 55 dBA. Therefore, construction noise from the Revised Project in combination with other projects would not expose sensitive receptors to a substantial increase in ambient noise levels. This impact would be *less than significant*. As such, there would be no new or more significant cumulative impact related to construction noise.

NO-7: Cumulative Vibration Impacts. Vibration from the construction of other developments in the city would generally not combine with the Revised Project and expose people to or generate excessive ground-borne vibration because of the localized nature of vibration impacts. High levels of ground-borne vibration at each of the construction sites would continue to be isolated and would affect only receptors within proximity to individual pieces of construction equipment. The vibration impact of the Revised Project in combination with vibration from other development would be *less than significant*. As such, there would be no new or more significant cumulative impact related to construction vibration.

NO-8: Cumulative Operational Noise. Operation of other projects in the vicinity of the Previously Proposed Project included noise sources that would not combine to exceed noise standards, and therefore, cumulative impacts related to operational noise were less than significant. Traffic noise and operational noise associated with the Revised Project would not combine to exceed noise standards because of the distance between the Project Site and all foreseeable development projects. Therefore, there would be no new or more significant cumulative impact related to operational noise, resulting in a *less-than-significant* cumulative impact.

Parks and Wind Effects on Recreation

Summary of Previously Proposed Project

RW-1: Effects on Windsurfing and Kiteboarding Recreational Resources. According to the wind study conducted for the Previously Proposed Project, ²⁸ development would result in a 10 percent or greater reduction in wind speeds in a confined area, extending approximately 400 feet east of the existing Airport Boulevard bulkhead. In the north-south direction, this wind shadow would begin approximately 400 feet north of the Coyote Point shoreline and extend approximately 400 feet from that point to a point approximately 800 feet from the shoreline. The wind shadow caused by construction of the Previously Proposed Project would not substantially affect the primary windsurfing launch sites, transit lanes, or near-shore windsurfing and kite boarding areas at the Coyote Point Recreation Area. Furthermore, because implementation of the Previously Proposed Project would not result in a greater than 10 percent reduction in wind speed and turbulence at irreplaceable launching and landing sites, or over large portions of transit routes or primary windsurfing and kite boarding areas, the Previously Proposed Project would be consistent with the Bayfront Specific Plan.

Although there was no project application for the development of the 350 Airport Boulevard site, the wind study conducted for the Previously Proposed Project included a program-level analysis of potential wind effects, assuming that the 350 Airport Boulevard site would be developed along with the Previously Proposed Project. The previous wind study used applicable zoning designations to estimate what could be built on the 350 Airport Boulevard site. The previous wind study determined the wind shadow that would result from development of both the Previously Proposed Project and development on the 350 Airport Boulevard site would extend farther north and east into the Bay compared to the wind shadow associated with the Previously Proposed Project. However, since development on the 350 Airport Boulevard site was uncertain, and no design plans were available for that site, the certified Final EIR concluded that with implementation of mitigation requiring a future wind study if a specific project were to be proposed on the 350 Airport Boulevard site, impacts to wind-related recreation in the near-shore area would remain *less than significant*.

RW-2: Existing Recreational Facilities. Implementation of the Previously Proposed Project would result in approximately 2,475 employees (i.e., between office uses and amenities). The increase in new residents as a result of the Previously Proposed Project would not result in a substantial increase in demand for or use of recreational facilities. Furthermore, the Previously Proposed Project would include open space corridors between buildings and plazas and gathering spaces for employees and visitors, which would offset any potential impacts on surrounding recreational areas or demand for new recreational facilities. The Previously Proposed Project would also include connections to the San Francisco Bay Trail (Bay Trail) via the east-west pedestrian promenade, smaller open space and landscaped areas, and improvements to the eastern shoreline open space and Bay Trail along San Francisco Bay (Bay). Along the eastern shoreline, the Bay Trail would be extended north and south within the 100-foot shoreline band. A Bay Trail plaza and waterfront overlook would be located midway along this stretch of Bay shoreline. In addition, the Previously Proposed Project would include similar improvements to the Bay Spur Trail, located along the Sanchez Channel on the west side of the Project Site. As such, implementation of the Previously Proposed Project would not result in substantial physical deterioration of existing recreational facilities as a result of increased use, nor would the Previously

²⁸ Ballanti, Donald. *Potential Wind Conditions in the Bay East of the Proposed 300 Airport Boulevard Development, Burlingame, California*. Technical memorandum. November 9. Included as Appendix I of the Draft EIR.

Proposed Project require expansion of existing facilities, which could have adverse environmental effects. The Previously Proposed Project would have a *less-than-significant* impact on recreational facilities and the environment.

RW-3: Cumulative Effects on Windsurfing Recreational Resources and Recreational Facilities. There is no other development planned for the Bayfront Specific Plan area, and there would be no cumulative impact on windsurfing recreational resources at Coyote Point Recreation Area. As described under Impact RW-2, above, because of the inclusion of onsite open spaces and improvements to the eastern shoreline open space and Bay Trail, the Previously Proposed Project would have a less-than-significant impact with regard to the physical deterioration of existing recreational facilities as a result of increased use. In addition, all improvements to public open spaces under the Previously Proposed Project would adhere to the respective jurisdiction's design requirements to ensure that the improvements would have less-than-significant environmental effects. When considered in the context of other development within the city, the Previously Proposed Project would not result in cumulatively considerable adverse effects on recreational facilities or the environment. Cumulative recreation impacts would be *less than significant*.

Impacts of Revised Project

Impacts to Be Evaluated

RW-1: Effects on Windsurfing and Kiteboarding Recreational Resources. The Revised Project would construct buildings with heights and overall massing that would be virtually identical to what was proposed under the Previously Proposed Project. However, there would be differences in the geometry and positions of the buildings. A wind study was conducted for the Revised Project,²⁹ similar to the wind study conducted for the Previously Proposed Project. According to the wind study conducted for the Revised Project, development of the Revised Project would result a maximum reduction in mean wind speeds of 3 percent whereas approximately 70 percent of the test locations displayed unchanged or increased (up to 6 percent) wind speeds compared to those of the Previously Proposed Project. Conversely, approximately 10 percent of the test locations experienced an averaged increase in turbulence intensity (up to a 4 percent difference), while the remaining test locations experienced an averaged unchanged or decreased turbulence intensity compared with the Previously Proposed Project. The test results show that the difference in wind speeds associated with recreational wind-associated activities between the Previously Proposed Project and the Revised Project would not be significant. As with the Previously Proposed Project, the Revised Project would not result in a reduction of 10 percent or more in wind speeds at launching and landing sites, primary board sailing areas, or large portions of transit routes. Therefore, the Revised Project would result in a less-than*significant* impact on windsurfing and kiteboarding recreational resources.

A separate wind study³⁰ was conducted for the Revised Project plus a potential development at the 350 Airport Boulevard site, although there is currently no approved or proposed project for the 350 Airport Boulevard site. Potential development on the 350 Airport Boulevard site was included in the wind study for the Revised Project to maintain some consistency with the previously certified Final EIR and be able to compare the wind impacts of the Previously Proposed Project and the Revised Project. According to

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²⁹ BMT Fluid Mechanics. 2016. *Burlingame Point Development – Wind Impact Analysis*. Technical Memorandum. July 18. Included as Appendix B-1 of this document.

³⁰ BMT Fluid Mechanics. 2016. *Burlingame Point Development Including Potential Buildings at 350 Airport Boulevard* – *Wind Impact Analysis.* Technical Memorandum. July 18. Included as Appendix B-2 of this document.

the wind study conducted for the Revised Project plus the potential development at the 350 Airport Boulevard site, development would result a maximum reduction in mean wind speeds of 4 percent whereas approximately 80 percent of the test locations displayed unchanged or increased (up to 4 percent) wind speeds compared to those of the Previously Proposed Project. Conversely, approximately 25 percent of the test locations experienced an averaged increase in turbulence intensity (up to a 5 percent difference), while the remaining test locations experienced an averaged unchanged or decreased turbulence intensity compared with the Previously Proposed Project. The test results show that the difference in wind speeds associated with recreational wind-associated activities between the Previously Proposed Project and the Revised Project plus potential development at the 350 Airport Boulevard site would not be significant. As with the Previously Proposed Project, the Revised Project would not result in a reduction of 10 percent or more in wind speeds at launching and landing sites, primary board sailing areas, or large portions of transit routes. However, since the development of the 350 Airport Boulevard site remains uncertain, and there are still no design plans available for the 350 Airport Boulevard site, the mitigation measure from the certified Final EIR requiring a wind study if a project is proposed on that site would still be applicable. Therefore, the Revised Project plus potential development at the 350 Airport Boulevard site would result in a less-than-significant impact on windsurfing and kiteboarding recreational resources.

RW-2: Existing Recreational Facilities. The Revised Project would result in the same number of employees at the Project Site as the Previously Proposed Project. Similar to the Previously Proposed Project, employees from the Revised Project would represent a negligible increase in population when considered in the context of the existing population and would not result in a substantial increase in demand for or use of recreational facilities. Furthermore, the Revised Project would include a pedestrian promenade between the buildings and gathering spaces for employees and visitors, which would offset any potential impacts on surrounding recreational areas or demand for new recreational facilities. The Revised Project would also include connections to the Bay Trail via the east-west pedestrian promenade, smaller open space and landscaped areas, and improvements to the eastern shoreline open space and Bay Trail along the Bay. In addition, the Revised Project would include similar improvements to the Bay Spur Trail, located along the Sanchez Channel on the west side of the Project Site. As such, implementation of the Revised Project would not result in substantial physical deterioration of existing recreational facilities as a result of increased use, nor would the Revised Project require expansion of existing facilities, which could have adverse environmental effects. The Revised Project would have a less-than-significant impact on recreational facilities and the environment.

RW-3: Cumulative Effects on Windsurfing Recreational Resources and Recreational Facilities. The 1300 Bayshore Highway project would be located within the Bayfront Specific Plan area. However, it is not expected that this project, in combination with the Revised Project, would have a substantial cumulative impact on windsurfing recreational resources at Coyote Point Recreation Area. The Revised Project would not result in significant wind impacts; therefore, although wind conditions could change in the area, the Revised Project's contribution would be less than cumulatively considerable.

As described under Impact RW-2, above, because of the inclusion of the pedestrian promenade and improvements to the eastern shoreline open space and Bay Trail, the Revised Project would have a less-than-significant impact with regard to the physical deterioration of existing recreation facilities as a result of increased use. In addition, all improvements to public open spaces that would result from the Revised Project would adhere to the respective jurisdiction's design requirements, ensuring that these improvements would have less-than-significant environmental effects. When considered in the context of other development within the city, the Revised Project would not result in cumulatively considerable adverse effects on recreational facilities or the environment. Cumulative recreation impacts would be *less than significant*.

4.1 CEQA Conclusion

Based on the analysis and discussion presented in this document, no supplemental or subsequent environmental analysis is needed pursuant to CEQA Guidelines Sections 15162, 15163, and 15164. It is concluded that the analysis conducted, and the conclusions reached, in the Final EIR certified in June 2012 remain valid. The Revised Project would not cause any new significant impacts or any substantial increases in the severity of previously identified significant effects. No changes have occurred with respect to circumstances surrounding the Previously Proposed Project that would cause significant environmental impacts to which the Revised Project would contribute considerably. In addition, no new information has become available that shows that the Previously Proposed Project or the Revised Project would cause significant new environmental impacts. Therefore, no supplemental environmental review is required beyond this Addendum.

7/19/2016

Date of Determination

I do hereby certify that the above determination has been made pursuant to State and local requirements.

William Meeker

Community Development Director

City of Burlingame

Community Development Department - Planning Division